

PSGR

Physicians and Scientists for Global Responsibility

New Zealand Charitable Trust

Formerly Physicians and Scientists for Responsible Genetics New Zealand

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AUSTRALIA	NEW ZEALAND

Submission on Proposal P1041 Removal of Country of Origin Labelling Requirements

To remove country of origin labelling requirements from the *Australia New Zealand Food Standards Code* as part of proposed new arrangements where the requirements will fall under Australian Consumer Law.

Potentially affected Standards 1.1.1, 1.2.1. and 1.2.11. Standard 1.2.11 does not apply in NZ

“Food cannot be sold if it is unsafe, unfit for human consumption or contaminated. ‘Food’ as defined in Food Act includes ingredients and anything to be mixed or added to food.”

<http://www.foodsafety.govt.nz/industry/importing/overview/>

Food Safety Australia New Zealand and the NZ Food Safety Authority agree that consumers should be given the information they need to make informed food purchasing decisions. That must include country of origin labelling.

PSGR acknowledges the efforts of New Zealand businesses to voluntarily identify the country of origin of their produce/products as endorsed by government.

A single food or food ingredient is easily identified with a country of origin and can, therefore, easily meet labelling requirements.

While we appreciate that insisting on labelling the origin of every food or food ingredient in a processed food is impractical, we recommend that it should be possible to highlight every food ingredient grown in New Zealand.

Likewise, the use and distinction of ‘Product of New Zealand’ and ‘Made in New Zealand’ should remain and be mandatory; the latter requiring clarification where imported ingredients are included

PSGR supports voluntary country of origin labelling,

PSGR would encourage the introduction of regulated, mandatory country of origin labelling to ensure accurate compliance for all fresh and single ingredient foods; fruits, vegetables, meats, and seafood, and for single bulk component foods such as flour, grains, and nuts. This will aid consumers in making an informed choice. Such foods should be clearly identified on package labels and at the point of sale.¹

PSGR points out that the issue of country of origin labelling includes and goes beyond ‘food safety’. Making a decision purely on the claimed safety of ingesting a given food misses FSANZ’s duty of care for the wider health issue of New Zealanders and New Zealand.

1 Country of origin labelling will allow New Zealand consumers to support local industry.

Every dollar consumers spend on foreign grown food is a dollar lost to local producers. For local producers and growers country of origin labelling will contribute significantly to their industries and encourage consumers to buy local produce about which more accurate knowledge of potential contaminants is known. Valid informed choice requires accurate information.

1.1. Pork

As an example, New Zealand has seen its pork industry significantly diminished by large volumes of unlabelled imported pork. Every week, 700,000 kgs of pork is imported from Canada, the US, Australia, Scandinavia and China. There is no requirement for this product to meet New Zealand’s 100% standards.²

Ninety five percent of the imported pork is used to make ham and bacon products sold throughout New Zealand. Many of the products have ‘Made in New Zealand’ on packaging² - a misleading statement.

Many Australian pig farmers treat their animals with hormones: “Reporcin is a hormone used in the Australian pork industry. It is administered daily for 30 days during the ‘finisher’ stage or the latter stage of production before slaughter. There is no withholding period for this hormone meaning that there is no waiting time between the last injection and processing of the pig for human consumption.”³

Also “the most popular growth promoter in the Australian Pork industry is Ractopomine, marketed as Paylean. This drug promotes rapid growth of muscle in the late stages of growth while minimizing fat in the carcass. Paylean is banned in over 160 countries including China.”³

New Zealand “pig farmers do not use growth hormones at all and only use antibiotics when necessary for the health and welfare of their pigs.”⁴

1.2. Tomatoes

Bulk fresh tomatoes are often Australian. To combat fruit fly, these have been soaked in dimethoate, an organophosphate insecticide which cannot be removed by washing and which has been found to disrupt reproductive function, to cause chromosomal aberrations, to damage the immune system, to disrupt the endocrine system and to affect the nervous system.

¹ Country of origin labelling fact sheet 6 September 2011 <https://home.greens.org.nz/factsheets/country-origin-labelling-fact-sheet>

² <http://www.pork.co.nz/nz-ham>

³ <http://www.humanechoice.com.au/FAQ>

⁴ http://www.farmwatch.org.nz/uploads/1/8/2/8/18284057/farmwatch_-_facts_and_fictions.pdf

1.2.1. “All fresh tomatoes imported into New Zealand are treated by irradiation.”⁵ This treatment can reduce the levels of some sensitive vitamins. Studies on Australian tomatoes confirmed the loss of vitamin C and B-carotene, among the more sensitive vitamins.

1.2.2. Buying locally grown food would also avoid ingesting residues of fumigation chemicals and pesticides used on food imports.

Over a four-month period at the Port of Tauranga Customs collected air samples from 519 containers imported from 24 countries on 43 different voyages, and used 497 valid air samples for study analysis.⁶ It found 89.7% were contaminated by one of the target fumigants⁷ and/or VOCs⁸, and 18.3% were above the safe reporting level. Multiple types were detected in 34%.

Of the commodities carried in the sampled containers foods comprised 21%.

The study revealed each air sample contained at least one and often several of the chemicals. Approximately 20% contained fumigants / VOCs at above the safe reporting level. These included ethylene oxide, methyl bromide⁹, benzene, ethylene dibromide, hydrogen cyanide, phosphine and chloropicrin. Formaldehyde was detected in 87% of the samples.

Such a study shows that imported fruit and vegetables almost certainly contain higher residues of chemicals after treatment with fumigants / VOCs and/or pesticides. They may also have had more pesticides applied during their growing season.

Such increases in pesticide contaminants are proven in respect of foods from countries growing genetically engineered food crops; principally the US, Canada and South America. “Herbicide-resistant crop technology has led to a 239 million kilogram (527 million pound) increase in herbicide use in the US between 1996 and 2011.”¹⁰ Based on USDA survey data, herbicide-tolerant (HT) soybeans comprised 94% of plantings in 2014 and in 2015, and corn was 89% in 2014 and in 2015. Insect-resistant Bt crops comprised 81% in 2015.¹¹

Some examples of fumigants used on imported fresh foods are:

Phosphine¹²: asparagus; flour and barley; cacao; dates;

Methyl bromide: apricots, dates and other fruit;

Carbon dioxide and carbon monoxide: cereals; coconuts; coffee beans; nuts;

Chloropicrin¹³: dates; fruit; nuts.

⁵ <http://www.tomatoesnz.co.nz/hot-topics/import-labelling/>

⁶ Report on the outcomes of the fumigant risk study, New Zealand Customs Service, May 2012

<http://www.airmatters.co.nz/wp-content/uploads/2015/04/report-on-the-fumigant-risk-study-external.pdf>

⁷ From 7 above - Fumigant is one of a number of techniques that are used to prevent or control insect infestations. Chemicals used as fumigants can exist in gaseous form at a certain temperature and pressure, and in sufficient concentration to be lethal to a given pest organism. Fumigant has acute effects on human health.

⁸ From 7 above - VOC is defined to include all organic compounds (substances made up of predominantly carbon and hydrogen) with boiling temperatures in the range of 50-260°C (excluding pesticides). Substances in the VOC category also include aromatic hydrocarbons (such as benzene, toluene and the xylenes). The VOCs can combine with other substances in the air to form ground-level ozone (smog). Ozone can damage lung tissue, cause respiratory illness, and can have a chronic effect.

⁹ <http://www.biosecurity.govt.nz/files/regs/treat/methyl-bromide-info.pdf>

¹⁰ ‘Impacts of genetically engineered crops on pesticide use in the U.S. – the first sixteen years’, Charles M Benbrook

<http://www.enveurope.com/content/24/1/24>

¹¹ <http://www.ers.usda.gov/data-products/adoption-of-genetically-engineered-crops-in-the-us/recent-trends-in-ge-adoption.aspx>

¹² <http://www3.epa.gov/airtoxics/hlthef/phosphin.html>

¹³ <http://nj.gov/health/eoh/rtkweb/documents/fs/0405.pdf>

2 Nutrients

Fresh is best. Buying locally would provide consumers for fresher, more nutritious food.

3 Helping to reduce CO₂ levels

Mandatory country of origin labelling would encourage consumers to buy locally produced food, food thus travelling lesser distances. This would aid in reducing CO₂ emissions and petrochemicals usage.

4 Genetically engineered foods imported

See 1.2.2. Country of origin labelling would aid consumers in deciding whether or not a food or food ingredient is likely to be transgenic or produced using genetic engineering technology, meeting consumers right to be informed in order to make informed choices.

PSGR urges FSANZ to take country of origin labelling into a productive future and not reject it as unnecessary. Many New Zealand growers support consumers' right to know where their food comes from and see the prospect of it increasing local demand.

Legislation should stipulate that a food labelled by word or symbol as a 'Product of New Zealand' the main ingredient must come from New Zealand. An item manufactured in New Zealand from imported ingredients must clearly state that and not simply that it is 'Made in 'New Zealand'.

Cancelling regulation/s that require Country of Origin labelling of a food or food ingredient, or even discouraging this practice, denies a consumer's right to know and make informed choices. While this practice is voluntary in New Zealand¹⁴ it is seen by consumers as an essential and justified public service in the interests of consumer health and the right to freedom of choice.

The Ministry of Primary Industries website says, "Knowing the country of origin does not convey whether the food is safe or suitable."¹ PSGR disagrees.

We acknowledge that it may be impractical for all foods entering the country to be fully tested for contaminants such as agricultural sprays not approved in New Zealand for example. However, some contaminated produce does slip through safety testing. The recent example of contaminated berries having to be recalled after distribution is significant.¹⁵ This incident only came to light when patients fell ill. Country of origin labelling would have given consumers a choice.

The MPI site admits that, "the policy of successive New Zealand Governments has been that country of origin labelling (across all food types) should be a voluntary practice for the food industry to use as a marketing tool. *This practice is influenced by consumer demand.*" (Our italics.) This practice must continue. Having country of original labelling aids consumers make a more informed choice of whether to buy and subsequently ingest a food product.

¹⁴ <http://www.foodsmart.govt.nz/whats-in-our-food/food-labelling/country-of-origin/>

¹⁵ 'Berry importer calls for mass recall of all China fruit' <http://www.stuff.co.nz/national/74776162/berry-importer-calls-for-mass-recall-of-all-china-fruit>. Fruzio Mixed Berries recalled by MPI in Hepatitis A scare <http://www.stuff.co.nz/national/health/74724172/fruzio-mixed-berries-recalled-by-mpi-in-hepatitis-a-scare>

In answer to the question raised by Radio New Zealand, "Are tainted food cases on the rise?" they quote "Statistics on the Food Standards Australia and New Zealand website show 23 product recalls so far this year compared to 27 last year and only 13 in 2013, which does suggest a jump."¹⁶

While many more incidents may be reported overseas, New Zealand's biosafety measures do protect consumers to a degree. Nevertheless, the precautionary principle demands country of origin labelling, and the distinction of 'Product of New Zealand' with clarified 'Made in New Zealand' to help consumers potentially and by choice avoid such contamination.

Jean Anderson

On behalf of the Trustees and Members of Physicians and Scientists for Global Responsibility New Zealand
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¹⁶ <http://www.radionz.co.nz/news/national/291828/are-tainted-food-cases-on-the-rise>