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Food Standards Australia New Zealand
PO Box 5423
Kingston ACT 2604

via email: submissions@foodstandards.gov.au.

Dear Sir/Madam

Removal of Country of Origin Labelling Requirements

Australian Pork Limited (APL) is the national representative body for Australian pork producers. APL is a producer-owned not-for-profit company combining marketing, export development, research and innovation and policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

Country of Origin Labelling (CoOL) is an issue of considerable importance to the Australian pork industry. APL welcomes the opportunity to comment on the Removal of Country of Origin Labelling Requirements and provides in principle support for the proposal to move CoOL requirements, currently in the *Australia New Zealand Food Standards Code*, into Australian Consumer Law.

APL understands that the ACL information standard intends to replicate the requirements of Standard 1.2.11 – Information requirements and that specified foods are to include extra labelling information.

APL notes however, that in its submission on the Country of Origin Food Labelling Information Standard 2015, that the Draft Information Standard fails to provide clarity around ham and bacon, as the proposed Made in Australia claim will enable the use of the Australia Made-Australia Grown kangaroo logo on imported pork which has been “substantially transformed” in Australia. For the Australian pork industry, this will be a retrograde step rather than an improvement on the current CoOL arrangements as under the current arrangements, this logo is unable to be applied to ham and bacon made from imported pig meat.

APL remains concerned about some aspects of the Information Standard for food, in particular the use of the “made in” claim and how brine, essential for the curing of pork into ham and bacon in order to impart the unique properties of these products, will be treated under the new laws.

APL understands that advice on the proposed CoOL Food Labelling Information Standard has been provided to the Minister for Industry, Innovation and Science and the Minister for Agriculture and Water Resources. APL awaits the outcome of this advice before providing unqualified support for the new CoOL system.

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Yours sincerely

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General Manager, Policy