

Food Industry Association WA Inc and Food Industry Advisory Group (CCIWA and FIAWA)

Submission to Food Labelling Review

Members of the Food Industry Association of Western Australia and the Food Industry Advisory Group (jointly coordinated by the CCIWA and FIAWA) would like to express concerns regarding the proposed recommendations of the Labelling Logic Report.

Some members of this group have also submitted individual comments in relation to this topic.

While most recommendations of the report are supported some specific concerns in relation to the following recommendations are highlighted for consideration.

Recommendation 12-15

Imported food should be subjected to the same level of monitoring and scrutiny as domestic produced product with similar considerations for labelling.

In terms of nutritional information and the requirement for more scientific based information; having more scientific nutritional information does not contribute to better public health. This only serves to make businesses (especially small businesses) pay for additional expensive lab testing, over and above existing requirements.

Recommendation 51-54

Front of pack traffic labels will impact food manufacturing businesses.

For example:

'Traffic light' proposal on labels and the size of a products label.

There is insufficient room to comply with the current basic requirements unless product packs are of a large size (cereal box size). Small 500g jar labels would not be able to accommodate more information. Manufacturers already have to supply a NIP panel.

The NIP information system in the UK, where it can be put in a line of text rather than a NIP panel, would be more suitable for a number of products like honey, vinegar etc.

For small manufacturers supplying to both the food service and retail food industries, the costs of changing all labels will be prohibitive. In fact for some companies it may result in the closing of part of their business in particular their supply to the retail industry.

Small manufacturers buy labels in bulk to get the best price and as a result when, labelling requirements change, small manufacturers are only given a certain amount of time to change labels. Any stock not changed has to come off the shelf and is lost at a considerable cost to a company. Labels can be for 12-18 months of stock.

Small food manufacturers are crucial to the food industry because they do not downsize like the larger companies do – they continue on providing an important sustainability component to the industry.