



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

National Office
Level 4 Central House
26 Brandon Street
PO Box 25-498
Wellington 6146
(04) 473 7623
www.ncwnz.org.nz

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**Submissions to the New Zealand Food Safety Authority on
Proposed Options for Country of Origin Labelling of Food**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 nationally organised societies. It has 34 branches spread throughout the country to which women from some 150 societies are affiliated. Its purpose is to work for the well being of women, families and society through research, discussion and action.

Members of NCWNZ have raised concerns about the labelling of food previously. This submission is based on our policy and the previous work that we have undertaken.

1. What is your preferred option for the regulation of country of origin labelling of food? (See Section 5 of the Consultation Paper on Country of Origin Labelling of Food)

Although none of the options proffered mandate provision of information on the country source of ingredients, in the case of products labelled with 'made in' claims NCWNZ prefers Option 1. This option does have mandatory identification of the country in which the food was made or produced along with the options of either stating that 'imported ingredients' were used or stating where those imported ingredients came from, when appropriate

2. Please provide justification for your preferred option using the broad policy framework and the specific objectives of origin labelling.

NCWNZ believes that food should be labelled as to its country of origin. Information gathered from our membership has shown that women wish to be able to support local food producers, to help address employment issues in New Zealand and to allow women to make choices in relation to perceived food safety issues as a result of production processes in other countries. Our membership spoke particularly strongly on this issue in relation to irradiated food in 1987 with policy that 'urge[d] the government to adopt appropriate safety and labelling regulations for any importation ... of irradiated food ...' and genetically modified food and our 1998 policy 'require[s] labelling of all genetically modified food sold in New Zealand'.

NCWNZ recognises that this call from the women of New Zealand for 'transparency of food origins' contradicts the results of consumer-based research by FSANZ as to the awareness, knowledge and attitudes toward food labelling amongst consumers and selected stakeholder groups in Australia and New Zealand. We respectfully assert that the ongoing support of our wide membership for food labelling as to country of origin must bring into question the validity of the findings of the FSANZ survey.

It is widely recognised that women are the primary purchasers of foodstuffs for domestic use. Women have clearly stated that they wish to be able to make informed choice about the food they purchase, including choice about what country that food was produced in. NCWNZ does not accept that change to mandate such labelling should be denied, simply because New Zealand policy makers and industry have not listened in the past to the call from women for food to be labelled with the country of origin and manufacture. NCWNZ membership continues to support such mandatory labelling.





One of the given reasons in opposition to this Option is the compliance cost to New Zealand manufacturers, consumers and government. Recognising that, in some instances, there would need to be changes to labelling of products, NCWNZ asserts that a large percentage of food processors already voluntarily label their products with the country of origin, and no increased costs could be justly claimed, or passed on to consumers, in those cases. However, we do recognise that monitoring compliance would necessitate some increased costs; the level of those costs dependent on the extent that monitoring took place. The Australian system of investigating only when complaints are made may well be sufficient monitoring of compliance with the Regulations.

3. Are there other options for country of origin labelling that you believe should be included in the consultation paper?

NCWNZ would like to see food labelling on all food products with country of origin listed for all ingredients. However, it is recognised that in the manufacturing of some products, this would be an excessively onerous and expensive requirement, and perhaps on occasion impossible to comply with. Consequently, it would be accepted for the major ingredients in processed food products to be identified as to country of origin, with lesser content noted as being 'imported' when this was the situation.

4. For the options you have listed above, please comment on the advantages and disadvantages of implementing each of these mechanisms.

This question has been partly answered in the above response. The advantages of labelling all ingredients as to country of origin would allow the consumer to make informed choices with regard to supporting the New Zealand economy, supporting employment for New Zealanders, and opting not to purchase food from countries whose food production methods they felt concern about, for whatever reason, but including GE and food irradiation.

Thank you for the opportunity to comment on the proposed options for country of origin labelling of food. For the reasons stated above we support Option 1.

Beryl Anderson
National President

Bronwyn McFarlane
Board Member