



## National Council of Women of New Zealand

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Wahine O Aotearoa

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### Submission to Ministry of Consumer Affairs on the Discussion Paper: Voluntary GM-Free Labelling

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.

NCWNZ has sought members opinions on voluntary GM-free labelling by circulating the Ministry of Consumer Affairs' discussion document to the members of the NCWNZ Consumer Affairs Standing Committee, to Branches and to some of the affiliated organisations. As the membership of NCWNZ includes rural and urban women, this submission, on what is an important issue, represents the opinions of a broad cross-section of women in New Zealand.

#### Summary

NCWNZ is in favour of clear, accurate "GM-free" labelling, and the general consensus of the membership is that there is an increasing consciousness of the importance of clear, honest labelling on products available for sale.

#### 1. Terminology

- The majority of members support the concept of a "GM-free" label; it is considered that such a label is self-explanatory. Consumers believe that they have a right to make choices about the food they eat in the interests of their own and their family's health, and the health of future generations. For medical (whether scientifically justified or not), social and ethical reasons, consumers want to be able to deliberately exclude GM food from their diets.
- NCWNZ also supports a standard symbol for "GM-free", such as the 'green tick' that has been proposed in the past or one of the logos already recognised on overseas products by NZ consumers.
- NCWNZ supports "GM-free" labelling on food even where, as yet, there are no genetically modified counterparts or equivalents, and does not consider this to be misleading in regard to unlabelled products. The labelling provides assurance about the product itself and does not 'comment' on other products.

#### 2. Features

- NCWNZ considers that the label should feature "**GM-free**", possibly with a simple background logo such as those used on overseas "GM-free" labels.
- Identity-preservation and product tracing mechanisms should ensure that the product meets the standards required by the Fair Trading Act 1986.
- Labels should be standardised for ease of recognition and to provide public confidence in the claims represented by the label.





### 3. Self-regulatory options

- NCWNZ considers that certification should be built on a national standard through AgriQuality using IANZ accreditation. This standard should comply with the Fair Trading Act 1986.
- The main advantages NCWNZ sees would be that, through the accreditation process, providers and consumers could have confidence that the monitoring and auditing procedures ensure that the products are “GM-free” as claimed. The label is the guarantee.
- The obvious disadvantages of certification are the establishment costs involved and the compliance costs. The set-up costs could perhaps be moderated through ‘buying in’ to an already established accreditation process from another country.
- Concern was expressed as to what would be the monitoring process used to verify the "GM-free" claims made by many stall holders at 'weekend food markets'.

### 4. Assessing Options

- NCWNZ would accept that flexibility would need to be a requirement of any labelling system, to allow for developments from ongoing research, but would be reluctant for that flexibility to allow any regression in the standards.
- NCWNZ agrees that there should be a dispute resolution system, and would expect that it would be mandated to work within rigid (short) timeframes.
- NCWNZ considers it is the responsibility of government *and* industry to fund a labelling system. New Zealand is a small country and many small manufacturers would find the cost of labelling injurious to their business viability. Government financial support will spread the cost over all.

### General comments

Some rural members felt that run-off water as a vector for GM-derived matter, for example fertiliser derived from GM source materials, poses a risk to the organic and prospective "GM-free" accreditation of farms and horticultural units and the products they produce."

NCWNZ members consider all stakeholders need input in this important issue. Consumer input is vital, and women consumers must continue to be part of the equation as they are the main food purchasers.

### Conclusion

NCWNZ thanks you for the opportunity to comment on this issue. NCWNZ has maintained a keen interest in food safety and will look forward to the outcomes of this discussion document.

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National President

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Convener, Consumer Affairs Standing Committee