



**National Council of
Women of New Zealand**

Te Kaunihera
Wahine O Aotearoa

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S17.06

Submission to Primary Production Committee on the Consumers' Right to Know (Country of Origin of Food) Bill

Introduction

- 0.1. The National Council of Women of New Zealand, Te Kaunihera Wahine O Aotearoa (NCWNZ) is an umbrella group representing 283 organisations affiliated at either national level or to one of our 21 branches. In addition, about 260 women are individual members of branches. Collectively our reach is over 290,000 with many of our membership organisations representing all genders. NCWNZ's vision is a gender equal New Zealand and research shows we'll be better off socially and economically if we're gender equal. Through research, discussion and action, NCWNZ in partnership with others, seeks to realise its vision of gender equality because it is a basic human right.
- 0.2. NCWNZ has previously submitted to the Australia New Zealand Food Authority on Proposals 219¹, 206 and 207², to the New Zealand Food Safety Authority on Proposed Options for Country of Origin Labelling of Food³ and on the issues consultation paper on Food labelling Law and Policy Review.⁴ NCWNZ Resolutions have urged for the adoption of appropriate safety and labelling regulations in relation to irradiated or genetically modified foods.⁵
- 0.3. This submission has been prepared by the NCWNZ Consumer Affairs Standing Committee and Parliamentary Watch Committee and builds on comments from members recorded in previous submissions as referred to above.

¹ S00.15 Proposal P219: Labelling of foods containing alcohol <https://www.ncwnz.org.nz/wp-content/uploads/2013/06/S00.15-ANZFA-P219-Labelling-of-foods-containing-alcohol-1.pdf>

² S00.23 Added Water and Percentage Labelling <https://www.ncwnz.org.nz/wp-content/uploads/2013/06/S00.23-ANZ-Food-Authy-on-Proposals-P206-P207-Added-Water-Percentage-Labelling-draft-Std-1.2.10-Characterising-Ingred-Components-of-Food-1.pdf>

³ S03.14 Proposed Options for Country of Origin Labelling of Food <https://www.ncwnz.org.nz/what-we-do/ncwnz-archive/submissions/s03-14-proposed-options-for-country-of-origin-labelling-of-food/>

⁴ S10.12 Food Labelling Law and Policy Review <https://www.ncwnz.org.nz/wp-content/uploads/2013/06/S10.12-Food-Labelling-Law-and-Policy-Review.pdf>

⁵ Resolutions, 10.4.4. Labelling, 10.5 Food and Nutrition

10.5.21 That NCW urge the Government to adopt appropriate safety and labelling regulations for any importation, production, and/or distribution of irradiated food and other goods. 1987.

10.5.22 That this Conference of NCWNZ call on the Prime Minister and the Minister of Health to require labelling of all genetically modified food sold in New Zealand. 1998.

- 0.4. NCWNZ supports this Bill as comments from the 2010 submission on the Food Labelling Law and Policy Review show: “Responses strongly agree that all packaged foods require labelling in regards to contents and country of origin.” “The most important message is to inform the consumer of the contents of the product and country of origin on the labels.”⁶
- 0.5. NCWNZ does not believe, however, that the Bill goes far enough in relation to online purchasing of food, food purchased in restaurants and cafes, or in advertising of foods.
- 0.6. Results of the joint Consumer New Zealand and Horticulture New Zealand survey⁷ show New Zealand consumers support mandatory labelling of fruit and vegetables to show where the fruit and vegetables were grown. Seventy-one percent of the 1000 people surveyed believed such labelling should be compulsory for fresh produce, and sixty percent said they looked for the country of origin when purchasing fresh produce.
- 0.7. NCWNZ believes consumers’ awareness of the quantity of imported food in supermarkets has risen, as has their desire to know where food comes from, and it is now a strong consumer expectation. Denying consumers’ access to this information is out of step with consumer demand. Given that mandatory country of origin labelling exists for clothing and wine, the current situation appears anomalous and is particularly difficult to understand.
- 0.8. NCWNZ would add that consumers wish to know the origin of food products for a variety of reasons, including health and safety considerations. Some consumers prefer to purchase New Zealand food as they feel they can be confident of its health and safety status, and conversely some consumers do not feel confident of the health and safety status of food imported from some overseas countries. Other consumers seek to purchase New Zealand food simply in order to support local food production, and NCWNZ believes consumers have a right to be provided with country of origin information to assist in their decision-making regarding food product purchases.
- 0.9. Food producers have shown a willingness for New Zealand to follow other countries in bringing compulsory country of origin labelling and giving consumers choice, as noted by Mike Chapman, Horticulture New Zealand chief executive.⁸
- 0.10. Many countries already have mandatory country of origin labelling of food. This includes Australia, with whom New Zealand shares joint labelling requirements, and NCWNZ notes that having mandatory country of origin labelling has not adversely affected Australia’s ability to export overseas or trade in any way. It is further noted that many New Zealand food producers such as those from the horticulture industry highlight, on product labels, the fact that their food comes from New Zealand, because they believe this will increase consumers’ confidence in their product.

⁶ S10.12 Food Labelling Law and Policy Review <https://www.ncwnz.org.nz/wp-content/uploads/2013/06/S10.12-Food-Labelling-Law-and-Policy-Review.pdf>

⁷ <http://www.hortnz.co.nz/news-events-and-media/media-releases/new-zealanders-want-country-of-origin-labelling-on-fruit-and-veges/>

⁸ <http://www.hortnz.co.nz/news-events-and-media/media-releases/new-zealanders-want-country-of-origin-labelling-on-fruit-and-veges/>

- 0.11. NCWNZ finds it inexplicable that New Zealand would have opted out of the joint labelling standard on mandatory country of origin labelling that was prepared by Food Standards Australia New Zealand (FSANZ), and strongly recommends adoption into the FSANZ mandatory country of origin labelling standard.
- 0.12. The proposed Bill is one of significant interest to NCWNZ as members noted, in the submission to the New Zealand Food Safety Authority on Proposed Options for Country of Origin Labelling of Food, that women tend to be the primary purchasers of food stuffs. This is backed up by data from the 2015 Roy Morgan Smith Research in Australia showing that 62% of Australians who usually do the grocery shopping are women.⁹ The researcher (Angela Smith) notes “The fact remains though that women - and mothers especially - shoulder most of the grocery shopping responsibility.”
- 0.13. Research in New Zealand carried out by Lifestyles Research Group and the University of Otago identifies seven key lifestyle segment groups where women are the largest percentage in the majority of categories and especially so, in the largest category (“Progressive, 20% of consumers) where over 64% are female.¹⁰

Part 1, Clause 3 and Clause 5

- 1.1. The substantive clause outlining the purpose of the Bill is supported by NCWNZ as it reflects the need for simple, mandatory labelling of foods.
- 1.2. The present voluntary setting does not appear to be effective as evidenced in the joint Consumer New Zealand and Horticulture New Zealand research where, of the 65% of the respondents who looked for labelling information on fresh fruit, less than a third found it all times.¹¹
- 1.3. The principles for decision-making and action are supported by NCWNZ as they require accurate information about country origin in a clearly displayed manner at point of sale.
- 1.4. NCWNZ maintains that criteria to determine the legitimacy of information on country of origin needs to be evidence-based taking into account research on the methods of production.
- 1.5. NCWNZ believes the information displayed needs to be readily visible and recommends a minimum font size to allow for a diverse range of consumers and their reading ability.
- 1.6. NCWNZ believes information on country of origin should be readily provided within a set time frame should consumers request it, and that clarity of terminology is required. For example the difference between “Made in New Zealand” and “Product of New Zealand” may not be well understood by most consumers.

⁹ <http://www.foodnavigator-asia.com/Markets/Gender-stereotype-holds-true-Mothers-do-most-of-the-shopping>

¹⁰ Change, Challenge and Choice - A New Zealand Consumer Lifestyles Study 2013, Lifestyles Research Group and the University of Otago

¹¹ <http://www.hortnz.co.nz/news-events-and-media/media-releases/new-zealanders-want-country-of-origin-labelling-on-fruit-and-veges/>

Part 2, Clauses 6, 7, 8 and Clause 9, 3, (a) and (b), and 4 (a) and (b)

- 2.1. While the Bill specifies Packaged, Unpackaged food and the foods to which the Act would apply, it does not specify a requirement for labelling where foods are purchased online. NCWNZ would urge consideration of this as consumers move their purchasing behaviours towards such methods.
- 2.2. There is no reference to country of origin claims for foods and beverages consumed in restaurants and cafes that are identified on a menu, or in advertising, and NCWNZ would encourage guidelines in these settings.
- 2.3. NCWNZ recommends an advisory service be established where consumers and producers may seek advice and information on the requirement of any foods or food products to be labelled and in what manner the foods and food products are to be labelled.
- 2.4. The offence penalty levels appear minimal, and NCWNZ does not consider that a \$5,000 penalty for an individual, or a \$10,000 penalty for a body corporate, to be an appropriate deterrent where profit levels from product sales will significantly exceed these levels.

Conclusion

- 3.1. NCWNZ supports this Bill that reflects the need for consumer choice and awareness when purchasing food items, and notes most of such consumers are women. Further, NCWNZ would like the Bill to be expanded to cover online purchases, restaurant and cafe foods, and all advertising of food products.

Rae Duff
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