



**ACCI SUBMISSION TO  
FOOD REGULATION  
SECRETARIAT**

**FRONT OF PACK  
LABELLING CONSULTATION  
PAPER**

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**LEADING AUSTRALIAN BUSINESS**



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## ACCI – LEADING AUSTRALIAN BUSINESS

ACCI has been the peak council of Australian business associations for 105 years and traces its heritage back to Australia's first chamber of commerce in 1826.

Our motto is "Leading Australian Business".

We are also the ongoing amalgamation of the nation's leading federal business organisations - Australian Chamber of Commerce, the Associated Chamber of Manufactures of Australia, the Australian Council of Employers Federations and the Confederation of Australian Industry.

Membership of ACCI is made up of the State and Territory Chambers of Commerce and Industry together with the major national industry associations.

Through our membership, ACCI represents over 350,000 businesses nation-wide, including over 280,000 enterprises employing less than 20 people, over 55,000 enterprises employing between 20-100 people and the top 100 companies.

Our employer network employs over 4 million people which makes ACCI the largest and most representative business organisation in Australia.

### **Our Activities**

ACCI takes a leading role in representing the views of Australian business to Government.

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.

Our specific activities include:

- Representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally.
- Business representation on a range of statutory and business boards, committees and other fora.
- Representing business in national and international fora including the Australian Fair Pay Commission, Australian Industrial Relations Commission, Australian Safety and Compensation Council, International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, the Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, the Confederation of Asia-Pacific Chambers of Commerce and Industry and the Confederation of Asia-Pacific Employers.
- Research and policy development on issues concerning Australian business.
- The publication of leading business surveys and other information products.
- Providing forums for collective discussion amongst businesses on matters of law and policy affecting commerce and industry.

## Publications

A range of publications are available from ACCI, with details of our activities and policies including:

- The ACCI Policy Review; a analysis of major policy issues affecting the Australian economy and business.
- Issue papers commenting on business' views of contemporary policy issues.
- Policies of the Australian Chamber of Commerce and Industry – the annual bound compendium of ACCI's policy platforms.
- The Westpac-ACCI Survey of Industrial Trends - the longest, continuous running private sector survey in Australia. A leading barometer of economic activity and the most important survey of manufacturing industry in Australia.
- The ACCI Survey of Investor Confidence – which gives an analysis of the direction of investment by business in Australia.
- The Commonwealth-ACCI Business Expectations Survey - which aggregates individual surveys by ACCI member organisations and covers firms of all sizes in all States and Territories.
- The ACCI Small Business Survey – which is a survey of small business derived from the Business Expectations Survey data.
- Workplace relations reports and discussion papers, including the ACCI Modern Workplace: Modern Future 2002-2010 Policy Blueprint and the Functioning Federalism and the Case for a National Workplace Relations System and The Economic Case for Workplace Relations Reform Position Papers.
- Occupational health and safety guides and updates, including the National OHS Strategy and the Modern Workplace: Safer Workplace Policy Blueprint.
- Trade reports and discussion papers including the Riding the Chinese Dragon: Opportunities and Challenges for Australia and the World Position Paper.
- Education and training reports and discussion papers.
- The ACCI Annual Report providing a summary of major activities and achievements for the previous year.
- The ACCI Taxation Reform Blueprint: A Strategy for the Australian Taxation System 2004–2014.
- The ACCI Manufacturing Sector Position Paper: The Future of Australia's Manufacturing Sector: A Blueprint for Success.

**Most of this information, as well as ACCI media releases, parliamentary submissions and reports, is available on our website – [www.acci.asn.au](http://www.acci.asn.au)**

## INTRODUCTION

Australia has a well-deserved reputation for safe food. Consumers demand and have a right to expect that their health and safety be protected. The food industry responds by ensuring a high quality product is available for consumers. This is achieved through the food industry constantly employing the latest in technological advances and manufacturing practices to deliver quality and safety throughout the food chain. The food industry recognises that its profitability is intrinsically linked to food products that meet the necessary safety standards.

The food industry supports appropriate food regulation. It provides business with a level playing field, minimises anti-competitive behaviour and prevents false and misleading advertising. The consequences of the failure of food regulation to protect human health and safety can be devastating to the community, to individual businesses and to a nation's reputation as a food producer and exporter.

Domestically, food policy and regulation as applicable to the food manufacturing sector and foodservice sector must be guided by sound science-based decision making and risk assessment. Food legislation should be nationally consistent and focused on protecting human health and public safety. While the protection of human health and safety should be the motivating force for regulation of the food industry, it must be recognised that overly prescriptive regulatory arrangements can increase compliance costs for business and can act as a disincentive to investment and innovation.

As a policy development and advocacy body, the Australian Chamber of Commerce and Industry submission to the Food Regulation Secretariat on an *Front of Pack Labelling Consultation Paper* details overriding principles of food regulatory and labelling policy rather than specific business-level issues. We expect that some of our members (listed following) will be making submissions separately highlighting more specific concerns. Our submission should especially be read in conjunction with that of the Australian Beverages Council.

We have noted recent developments in the area of front of pack labelling and the work being done in this area by the *2009 Food Regulation Standing Committee (FRSC) Working Group to develop a Policy Guideline on Front of Pack Labelling*.

This submission outlines ACCI's policy framework for labelling, and our view that any labelling scheme introduced must be developed in consultation with industry, subject to a Regulatory Impact Statement, voluntary and flexible. With respect to the policy options given in the *Consultation Paper for a Front of Pack Labelling Policy Guideline* (the consultation paper), ACCI supports Policy Option 1, to maintain the status quo at least until the review of labelling has taken place and all stakeholders have been consulted.

### 1.0 POLICY FRAMEWORK – LABELLING

ACCI supports the labelling of products that is accurate, truthful and provides consumers with confidence in making decisions. It provides an important role in providing information to consumers. However, the challenge in labelling is to find a balance between providing sufficient information to consumers whilst minimising the regulatory burden on the food manufacturing sector.

It is paramount that any proposed labelling changes are subject to regulatory impact assessments leading to the development of a detailed Regulatory Impact Statement. The process must include a full cost benefit analysis to ensure that the costs to the food manufacturing sector are minimised and that where appropriate a flexible approach is adopted by the regulators to allow the food manufacturing sector to meet requirements. The Price Waterhouse Coopers report ‘Cost Schedule for Food Labelling Changes’<sup>1</sup> as prepared for FSANZ in 2008 reinforced industry’s position regarding the complex and expensive process involved in implementing labelling changes. Such changes are particularly expensive for small business where bulk orders are often made well in advance. For these reasons appropriate lead-in periods are necessary before any labelling requirements should become mandatory.

As well as ensuring compliance feasibility for industry, appropriate assessments prior to the implementation of regulation are imperative to ensure that proposed labelling changes are genuinely useful for and relevant to consumers. Labelling should take into account the varying nutritional elements of different foods. For example, percentage of daily intake (%DI) labelling allows manufacturers to provide details of product specific and relevant information, such as energy %DI labelling on soft drinks. In contrast, traffic light labelling can lead to nutritionally beneficial foods such as dried fruit to be classified as ‘red’ due to its high carbohydrate levels (discussed further under section 3.0). In order to be of benefit, labelling should be well understood by and helpful to consumers. ACCI believes the foodservice sector should continue to be expressly excluded from all labelling requirements.

## 2.0 THE NEED FOR A REGULATORY IMPACT STATEMENT

Given the scope of the proposed changes to current labelling requirements, ACCI believes that a full and comprehensive cost-benefit analysis as well as a Regulatory Impact Statement (RIS) needs to be prepared prior to any legislation being adopted.

The optimal use of RISs can contribute immensely to an effective and efficient regulatory system framework. However, it is clear that the use of RISs has not been as widespread or thorough as intended. A RIS must clearly indicate the costs to business of not only complying with the regulation (which is often higher than necessary due to the inflexibility of administration), but the costs to business in terms of industry funding the regulation, lost opportunities, reduced incentives and loss of competitiveness.

The RIS process should precede, rather than follow, the consultation process so that the analysis used in balancing costs and benefits can be adequately assessed by stakeholders. The effective use of RISs must be incorporated into a broader commitment to regulation that encompasses transparency, adequate consultation and responsiveness to the needs of the private sector as well as the community.

In addition there should be a minimum exposure period for RISs and an agreed set of ways that they are communicated to the interested parties including a RIS section in the electronic Business Entry Point (BEP) of the Commonwealth and State/Territory governments.

<sup>1</sup> Price Waterhouse Coopers, *Cost Schedule for Food Labelling Changes* 7 March 2008 FSANZ  
[www.foodstandards.gov.au](http://www.foodstandards.gov.au)

## 3.0 RESPONSES TO SPECIFIC ISSUES RAISED IN THE CONSULTATION PAPER FOR A FRONT OF PACK LABELLING POLICY GUIDELINE

### 3.1 Key Considerations for a Draft Ministerial Policy Guideline

ACCI does not consider that it is the role of the food regulator to educate consumers about the nutritional aspects of food or diet. These issues are complex, multifaceted and are better addressed, where appropriate, by health departments through other mechanisms including public health education initiatives.

The Front of Pack Labelling (FOPL) policy guideline will significantly affect industry and as such should be developed in consultation with industry. Any food regulatory policy is more likely to achieve its aims if implemented with the support of the food industry.

### 3.2 Consumer Choice and the Proposed Aims of Front of Pack Labelling

As with any supply-demand driven industry, the food industry is responsive to consumer demand. As consumers have become more health conscious over recent years, industry have developed products with lower sugar, fat and salt levels and provided increased nutritional information on packaging such as the introduction of %DI labels.

While ACCI recognises that obesity is an issue in Australia, public education rather than more regulated food labelling would better address this challenge. Results from the *2007 Australian National Children's Nutrition and Physical Activity Survey* found that older children in particular are more sedentary than in previous years.<sup>2</sup> In addition, while the survey notes that evidence is limited, it appears 'many [children] may not be getting enough physical activity for optimal health'.<sup>3</sup> Sufficient physical activity combined with a balanced diet can together combat obesity, and this twofold solution should be recognised in government policy.

### 3.3 A Front of Pack Labelling Scheme

Any scheme regulating the food labelling needs to be flexible. A 'one size fits all' approach is not appropriate for the food industry. A bottle of diet soft drink, for example, does not need to contain the same nutritional information as a packet of nuts. Food products vary in nutritional value across a wide range of vitamins and minerals. The %DI system, for example, allows food manufacturers to display product relevant information on their foods and beverages. Conversely, the traffic light system is not adaptable and causes several nutritionally sound foods (such as dried apricots) to be labelled unhealthy or 'red' due to one compositional aspect (in the case of dried apricots, high carbohydrates). The traffic light system can also be confusing for consumers when products display more than one coloured label (for example, margarine has a 'red' fat content but 'green' sugar content). Any labelling system adopted needs to be adaptable for use on a variety of products containing differing nutritional value.

<sup>2</sup> Commonwealth of Australia (2008) *2007 Australian National Children's Nutrition and Physical Activity Survey* Prepared by Commonwealth Scientific Industrial Research Organisation (CSIRO) Preventative Health National Research Flagship, and the University of South Australia, p.42

<sup>3</sup> Ibid., p.27

As discussed above, ACCI believes that consultation with industry as well as consumers in addition to the development of a Regulatory Impact Statement need to take place before any Front of Pack Labelling system is implemented. In the event that a FOPL scheme were to be introduced, ACCI considers that it should be a voluntary rather than mandatory scheme. The %DI scheme has already been voluntarily and widely adopted by food manufacturers. The implementation of any new scheme comes at considerable cost for industry. Small businesses, for example, can be forced to order packaging products up to several years in advance. Voluntary schemes allows business to manage costs and timeframes and have been shown to be widely adopted by industry. A voluntary scheme would also negate enforcement costs that would otherwise be incurred by government should a mandatory scheme be implemented.

### 3.4 Policy Option 1

ACCI supports *Policy Option 1* presented in the consultation paper, to maintain the Status Quo of no ministerial policy guidance on FOPL, at least until the review of food labelling has been completed.

Any labelling regulatory decision should be made following a comprehensive consultative process, cost-benefit analysis, RIS and review of the current system. Such a considered approach would be of benefit to both industry, consumers and regulators as it is likely to be most effective and at lowest cost.

A mandatory colour coded labelling scheme such as suggested in *Policy Option 4* would burden industry with significant compliance costs in an already difficult financial climate. It is remiss that the neither the cost burden on industry nor the lack of evidence showing the effectiveness of colour coded schemes are mentioned as ‘disadvantages’ of *Policy Option 4* on page 22 of the consultation paper.

## 4.0 CONCLUSION

ACCI emphasises the need for a comprehensive Regulatory Impact Statement including appropriate stakeholder consultation to be undertaken before any new labelling regulation is introduced. ACCI also notes the planned review of current food labelling and believes the results of this review should also be taken into account in the development of any FOPL scheme. For these reasons ACCI supports Policy Option 1 in the consultation paper, to maintain the status quo of no ministerial policy guidance on FOPL at the present time.

The introduction of a new food labelling scheme presents significant compliance costs to industry. As such, any changes made to current food labelling requirements should be supported by strong evidence in the RIS clearly indicating the proven benefits of the scheme. Any scheme eventually introduced will need to be flexible, voluntary and industry supported in order to be of least cost and most benefit to business, consumers and regulators.

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