



10 February 2020

Submission: Exposure draft consultation: Consumer Information Standards (Origin of Food) Regulations 2019

Thank you for the opportunity to submit on the Exposure draft consultation: Consumer Information Standards (Origin of Food) Regulations 2019.

**Harrington's Smallgoods is based in Miramar Wellington. We have a proud 25-year history** producing premium, award-winning New Zealand smallgoods.

We select only the best ingredients like premium New Zealand pork and beef, working from traditional recipes, and using plenty of artisan know-how to create superb sausages, beautiful bacon and sensational specialties.

**Harrington's is 100% New Zealand owned and crafted. We have an unwavering commitment** to quality - believing top-quality meat gives top-quality produce. We want to help Kiwis become more conscious about the food they consume. New Zealand grown meat, sourced from ethical New Zealand farmers, is a central element of our brand positioning. You can find out more at <http://www.harringtonsmallgoods.co.nz/field-to-fork/>

**Consumers want to know where their food is from and how it's made. We believe our** products meet consumer demand for free-range, New Zealand raised and made products. We are transparent at every step of our production process, and we communicate this proudly to our customers. Recent research has revealed people care about how animals are raised and farmed. New Zealand has higher standards of farming, compared to many other countries who farm pork and import to New Zealand.

We want to support our local industry and create a higher demand for NZ farmed and produced pork, to reduce our reliance on imported pork.

In our response to the proposed regulations, we have chosen to focus on two areas of the proposed regulations - the Meaning of Cured Pork and Disclosure of Information.

Proposed Meaning of Cured Pork

**We believe the proposed definition is too narrow and doesn't meet the original intent of the** legislation, which was to give consumers clarity, enabling them to identify imported pork from New Zealand pork.

Pork is different from other meats consumed in New Zealand. More than 60% is imported, and 85% of this pork of it is cured for food. Currently, this is hidden from consumers. We believe a broader definition of cured pork will better meet the intent of the legislation.



In our earlier submission on the legislation, we supported the New Zealand Pork Board's proposed definition that products containing at least 30% pork should be included in the description of cured pork. We continue to support this.

This issue at the heart of the legislation is a pork product's country of origin. We propose the definition of Cured Pork include:

- (a) A processed pork product that –
  - (i) **Contains pork flesh that is least 30% of the product's weight; and**
  - (ii) Is represented for sale as ham or bacon; or
  
- (b) A processed pork product that –
  - (i) **Contains pork flesh that is least 30% of the product's weight; and**
  - (ii) Contains ingredients for the purposes of preservation, flavouring, moisture enhancement, tenderising, yield extension or reforming; or
  
- (c) A processed pork product that –
  - (i) **Contains pork flesh that is least 30% of the product's weight; and**
  - (ii) Is represented for sale as a sausage.

#### Disclosure of Information

We support identifying the country *where* the pork was raised, but believe, at present, the requirements for *how* this is communicated is open to interpretation.

Under the proposed legislation, a manufacturer **could use a 'Made in New Zealand' label to sit alongside a 'Raised In' label, which will confuse** the consumer, and undermine the intent of the law.

**We believe only requiring the country of origin information to be 'clear and legible' is not enough.** In this situation, there is a risk the country of manufacture could overshadow the country of origin if not regulated.

**At each step of the legislation's process, the 'reasonable' consumer has been** central to decision making. As presently proposed, a reasonable consumer could easily be confused **when considering a 'made in' and 'produced in' label on a pork product at the supermarket.**

We would prefer definitions around

1. size and placement of the country of origin label and
2. **placement against other labels including 'made in'**

are considered as part of the regulations, to provide clarity for consumers and help maintain the integrity of New Zealand produced pork and products. If not, then we would recommend some guidance material at least is provided to both pork processors and the Commerce Commission to ensure the intent of the regulations are complied with.



HARRINGTON'S

Thank you again for the opportunity to provide feedback on the regulations.

Yours sincerely

Angus Black

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