

Submission re exposure draft of the Consumer Information Standards (Origin of Food) Regulations 2019.

Submission from Hellers Ltd.

Schedule 1: 2 Commencement (pg 2)

It is proposed that the regulations for fresh products come into force 6 months after gazetting. The request is for this time line to be extended for Bacon and Ham products (if they stay included in these regulations).

Lead time for packaging is up to 16 weeks for pre printed film (which we pack sliced ham into), and we carry a minimum of 12 weeks stock on hand, with average stock holdings across our printed ham packaging of 20 weeks. We request a minimum regulatory period of 9 months after gazetting, with the ideal being 12 months to avoid costly packaging changes and obsolescence.

Part 1 5 (2) (b)

Cured pork should not be included in these proposed regulations.

Cured pork is not minimally processed, and we believe including cured pork (Bacon & Ham) is an inconsistent approach, which onerously adds to the labelling requirements for these products. It is unclear why Bacon and Ham (and only these two processed meat products) have been singled out, at odds with the rest of the proposed regulations for minimally processed product.

An example of the inconsistency is that products that are subject to pickling or curing or preserving in salt (pg 10 in exposure draft consultation document) or section 6 (3) (a) to (i) of the Consumer Information Standards Regulations 2019 (Draft) means they are no longer fresh and these CoOL requirements do not apply EXCEPT for the exemption for Ham and Bacon when this definition does not apply, i.e. even though they are not fresh the CoOL requirement applies.

Part 2: 9 (1) Origin information

"The 1 or more countries in which the animal that became the food was raised."

To meet this requirement Hellers, like most New Zealand producers of Bacon and Ham, will have to list multiple countries of origin. This is due to the imbalance of supply vs demand for pork in New Zealand, necessitating the importation of pork meat. If Bacon and Ham must be included in the regulations for a reason still to be made clear, we support the following labelling declaration:

Preferred origin declarations that still provide the consumer with information regarding whether products are from New Zealand or imported are:

1. State "Made from Imported or Local ingredients" if the majority of the product is made using imported product eg the meat in a Bacon or Ham product.

- a. If the majority of the product is sourced from New Zealand then it would be declared as "Made from Local and Imported Ingredients"
2. Make a Continental statement such as Grown in "Europe / North America / Asia / Oceania". This will inform the consumer of the region of the world where this food comes from without requiring excessive country lists.

Both these options will allow consumers choice to buy product raised in New Zealand, or raised in other countries.