

7 February 2020

Competition and Consumer Policy
Ministry of Business, Innovation &
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To whom it may concern,

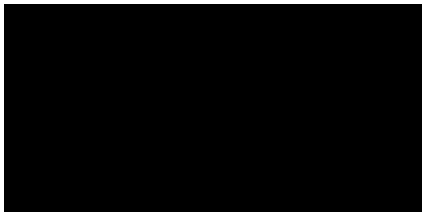
RE: Draft consultation: Consumer Information Standards (Origin of Food)
Regulations 2019:

Please find attached, a submission from World Animal Protection to the draft provisions on the proposed Consumer Information Standards (Origins of Food) Regulations.

We submit that the Regulations should apply consistently with full information about origins of food, within and across classes of food. In particular, given the volume of pork products imported to New Zealand, processed and unprocessed pork products should all be required to provide comprehensive information about Country of Origin.

Customers' right to know applies whether products have been marginally processed in New Zealand or not. The Regulations as proposed are confusing and contain loopholes which obscure product origin transparency, without justification.

Yours faithfully,



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World Animal Protection Limited Registered Charity CC53491



1. WORLD ANIMAL PROTECTION

World Animal Protection is an international, non-profit animal welfare organisation, formerly known as the World Society for the Protection of Animals. With our science and evidence-based approach, our vision is a world in which animal welfare matters and animal cruelty has ended.

We have offices in 15 countries across the globe. Our international office is in London. World Animal Protection has had a presence in New Zealand since 2003. We are members of the Animal Behaviour and Welfare Consultative Committee and the New Zealand Companion Animal Council. We work closely with the National Emergency Management Agency and the Department of Conservation to improve the welfare of all animals in New Zealand.

Globally, World Animal Protection has held Special Consultative Status at the United Nations since 1971 and was granted the higher-level General Consultative Status in 2013. We are the only animal welfare organisation to have this status. We use it to shine an international spotlight on global and national issues relating to animals.

2. Our Interest in clear Country of Origin Labelling

Animal welfare is increasingly important to consumers, and 'Country of Origin' labelling can assist discerning customers in determining the welfare of the animals used in their food, where 'Country of Origin' information can act as a proxy for welfare standards or assist in providing further information about production standards.

Consumers therefore need clear, comprehensive information about 'Country of Origin' so they can make the purchasing choice that best reflects their concerns and interests. This information should be consistent between and within food types.

Given the volume of food -especially animal products / meat, imported into New Zealand, and the need for increasing transparency in 'Country of Origin' and welfare standards, meat products should be clearly labelled, consistently, without arbitrary distinctions between and within different product types.

Therefore, pork and other animal products should be labelled with the same level of clarity and transparency, and different types of pork should also be treated the



same, with full and clear disclosure about the country where the imported animals are raised and therefore where meat is produced.

The Draft Regulations as notified, instead, create loopholes, and obscure 'Country of Origin' information across different pork types, without sound basis. This means consumers may be misled into thinking that pork and other meat products with a minimum amount of processing in New Zealand (such as marinating) are actually produced here. This is confusing for those who seek to ensure their pork is raised to New Zealand's potentially (relatively) higher animal welfare standards. It means those consumers who buy pork labelled 'processed in New Zealand' in pursuit of higher animal welfare products could be misled. It also means that New Zealand producers could be undercut by low animal welfare meat from overseas, sold as 'locally processed', when the only 'processing' could be as little as added marinade. Therefore, the provision that allows meat to be labelled differently if it's (even marginally) processed here, does a disservice to New Zealand producers and New Zealand production standards, and undermines our animal welfare standards.

The material supporting the Draft Regulations that says including the range of processed pork products would create a wide discrepancy between the treatment of pork and other types of meat. World Animal Protection argues that all animal products should have clear labelling about 'Country of Origin', where the animals are raised, regardless of additional and sometimes marginal processing here.

However, there is a case to be made that cured pork is a special category because over 60% is imported, and consumers want, and deserve to know where their food is coming from to help determine the conditions in which the animals are raised, and to shop accordingly.

3. Our submission

Our submission is that:

1. New Zealanders should be provided with full product label information to identify imported pork (and other animal products).
2. The country of origin labelling for pork, including cured pork, needs to clearly refer to the one country (or more than one country) where the animal was raised, consistent with the requirements on other meat products. It must not be labelled as 'produced' or 'made' because these terms have the potential to be



misrepresented as the country where additional processing or manufacture has occurred.

3. We request a wider definition of cured pork to 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.
4. Greater clarity is required on the presentation of 'Country of Origin' information which is currently too broad, non-specific, inconsistent and lacking in clarity and detail, especially when the products may have had additional local processing.
5. More detail is required to ensure product information is unequivocal, applies consistently and adheres to common interpretations and meanings. Only requiring that the 'Country of Origin' information is 'clear and legible' is not enough. At least some guidance should be provided so that the 'Country of Origin' of pork (and other animal products) is not overshadowed by country of manufacture. Guidance on labels should be provided so that equal or greater emphasis is provided to 'Country of Origin' information compared to country of manufacture. This reflects the intent of the regulations to increase consumer information.

4. Conclusion

In pursuit of higher animal welfare standards here and across the world, World Animal Protection supports full product origin disclosure in labelling. The Draft Consumer Information Standards (Origin of Food) Regulations are an important first step.

However, because meat generally, and pork products specifically are not treated consistently, there is a risk of unintended consequences, with the potential that consumers are potentially misled regarding the source of pork products in particular, driving demand for lower welfare imported meat that is



only marginally processed here, but incompletely, legally, labelled as produced and/or manufactured here.

Consumers' right to know where their food comes from and how the animals used in food production are raised, should be paramount. Food labelling is critical in imparting information to customers, and the exceptions proposed in the Draft Regulations are confusing and potentially misleading. Therefore, the relief sought in this submission to improve transparency and consistency are required, to best serve consumers' rights to full 'Country of Origin' information, and animal welfare standards and aspirations.