



**ZOOS VICTORIA'S SUBMISSION TO THE
HOUSE ECONOMICS COMMITTEE**

15 August 2011

**In support of the Inquiry into Food Standards Amendment (Truth in
Labelling - Palm Oil) Bill 2011**

Introduction

Zoos Victoria appreciates the opportunity to put forward this submission on the Food Standards Amendment (Truth in Labelling Laws – Palm Oil) Bill 2011.

Zoos Victoria supports this Bill and believes that passing this Bill is the right thing to do from a health, environmental, ethical and consumer choice perspective.

One of the objectives of the current *Food Standards Australia New Zealand Act 1991* (FSANZ Act) is the provision of adequate information relating to food to enable consumers to make informed choices¹. Zoos Victoria believes that by mandating the labelling of palm oil on all products (including food products) Australian consumers will be able to exercise this right to make an informed choice when purchasing food products that contain palm oil.

The issue of informed choice is not limited in any way by the FSANZ Act and we believe it can extend to international environmental issues and any other issues about which the consumer may wish to be informed. This aligns to the findings of the Senate Community Affairs Committee Report on Food Standards (Truth in Labelling – Palm Oil) Bill 2011 which states in section 2.112 “FSANZ does have a mandate to facilitate labeling that is not solely for health and safety reasons.”

While public health and safety is the highest priority of FSANZ in developing food standards and this issue must be considered in determining whether to make or vary a food standard, this is not the only matter relevant to the making of a food standard.

Zoos Victoria believes that the case for this Bill to be passed in its entirety is further supported by the fact that the Australian Government’s independent review of food labeling, *Labelling Logic* (otherwise known as the Blewett Review) also recommended that palm oil be labeled.

The case for palm oil labeling is not unique to Australia. Inspired by the Food Standards Australia (Truth in Labelling – Palm Oil) Bill 2010, the European Union Parliament has adopted regulations that also mandate for the labelling of palm oil across the European Union. This is a global issue that will not go away and Australia has the opportunity to be a leader on this important environmental, health and consumer choice issue.

Finally, through the *Don’t Palm us Off* campaign, a national palm oil labeling campaign spearheaded by Zoos Victoria 163,917 Australian consumers have asked the Australian Government to mandate for palm oil labeling in Australia.

¹ Part 1, 2A Object of Act (c), *Food Standards Australia New Zealand Act 1991*.

Background

Zoos Victoria is a zoo-based conservation organisation that is responsible for managing the State's three public zoos; Melbourne Zoo, Werribee Open Range Zoo and Healesville Sanctuary.

Under the Victorian *Zoological Parks and Gardens Act 1995* Zoos Victoria is obliged to “carry out and promote zoological research, the conservation of wildlife in its natural habitats and the maintenance of biodiversity”.² Zoos Victoria's conservation work covers both protection of wildlife and habitat in Australia and overseas in our priority regions of Australasia, South-east Asia and Sub-Saharan Africa.

Zoos Victoria's involvement in conservation is governed by both a legislative requirement and a moral and ethical obligation to the community, to the animals in our collection and in the wild.

With more than 1.7 million visitors to our zoos each year, Zoos Victoria plays a critical role in facilitating community involvement and action in conservation.

Palm oil

Palm oil is derived from the fruit of the oil palm. It is one of the world's leading agricultural commodities and is widely used as an ingredient in food products, cosmetics and other household items.

Over 85 per cent of the world's palm oil comes from Malaysia and Indonesia – the last remaining habitat of the Orang-utan.

Approximately 85 to 90 per cent of the supply of palm oil goes into food products³ and about 40 per cent of the packaged food products in Australia's supermarkets contain palm oil.⁴

Every year, Australians consume an average of 10 kilograms of palm oil each⁵.

Under the current FSANZ Act, it is not compulsory to label palm oil in food products. Instead, palm oil is often labeled as ‘vegetable oil’. Zoos Victoria believes this to be a misleading form of labelling that deprives Australian consumers of the right to make an informed choice about the products they buy.

More than 163,000 Australians have signed Zoos Victoria's *Don't Palm us Off* petition since August 2009 and Zoos Victoria encourages the federal government to conduct community research to determine just how important this issue is to Australians if it is questioned at the House Economics Committee Inquiry.

² Section 10 (d), *Zoological Parks and Gardens Act 1995*.

³ Malaysian Palm Oil Council, see <http://www.mpoc.org.in/palmoil-uses.htm>

⁴ Hickman, The guilty secrets of palm oil: Are you unwittingly contributing to the devastation of the rain forests? *Independent.co.uk*. 2 May 2009. <http://www.independent.co.uk/environment/the-guilty-secrets-of-palm-oil-are-you-unwittingly-contributing-to-the-devastation-of-the-rain-forests-1676218.html>

⁵ Palm Oil Action Group. See www.palmoilaction.org.au/images/palm-oil-action-brochure.pdf

At Melbourne Zoo, a study conducted in January 2010 found that 86.7% of Melbourne Zoo visitors, when asked, expressed that Orang-utan conservation is either important or highly important in their view and the views of their family and friends. A further 90% were in favour of mandatory labelling of palm oil on food products, supporting the statement that they would prefer the government change legislation to mandate labelling of palm oil⁶.

Zoos Victoria believes that every Australian has a right to decide whether they want to purchase products that contribute to the loss of species such as the Orang-utan. However current labelling laws do not give Australians this choice. Suggesting that this issue should be referred to FSANZ or other establishments for consideration defers the responsibility of an issue that requires prompt and urgent attention.

A conservation emergency

The United Nations Environment Programme (UNEP) believes palm oil is the major driver of deforestation in Borneo and Sumatra, and the biggest threat to the survival of the Orang-utan. They have called this situation a 'conservation emergency'⁷. Every hour an area the size of 300 soccer fields is deforested, and each week 50 Orang-utans die because of this deforestation to make way for oil palm plantations.⁸ At the current rate of deforestation the International Fund for Animal Welfare believes Orang-utans could be extinct in the wild within the next ten years.⁹

Because palm oil is not explicitly labelled in Australia, Australian consumers are unable to make an informed choice as to whether the food they buy is destroying Orang-utan habitat and pushing the species to extinction.

Attitudes towards mandatory labelling

Through Melbourne Zoo's *Don't Palm us Off* campaign, Zoos Victoria has been able to track attitudes towards the issue of mandatory palm oil labelling on all relevant food products.

For an overwhelming number of those who commented online, the most important issue is the consumer's right to make an informed choice. More than 50% of the 18,870 online respondents said they had the right make an informed choice about palm oil and food products without being prompted. People feel that their rights are currently being violated. They feel they have the right to know and understand exactly what they are buying so they can then make informed, ethical decisions. One respondent wrote; "It is time to label food fully and accurately...it is the moral, ethic and legal thing to do". And another wrote; "I want the option to choose non palm oil products by knowing which products are palm oil free. I lived

⁶ PhD research conducted by the University of South Australia, School of Psychology, Social Work & Social Policy. Pearson (2010).

⁷ *Last Stand of the Oranutan*, United Nations Environment Programme (UNEP), 2007

⁸ Palm Oil Action Group, www.palmoilaction.org.au

⁹ International Fund for Animal Welfare in Lean, 10 years left to live: Orang-utans face extinction in the wild. *Independent.co.uk*. 17 December 2006. <http://www.independent.co.uk/environment/nature/10-years-to-live-orangutan-faces-extinction-in-the-wild-428850.html>

in Malaysia and Indonesia from 1992-1995 when it was a jungle filled beautiful country, and I am horrified and disgusted by the destruction that is being fueled by the lack of palm oil labelling in Australia.”

Anger and frustration is also very evident among the contributors who have commented online. They feel anger that they are being misled, and frustration that they are limited in their control over their impact on the natural habitat of the Orang-utan. One such respondent wrote, “The underhand and misleading labelling practices of some companies must stop. It disgusts me to think of how much effort it takes to find out exactly what is in the food that I eat”.

There is also an overall sense of urgency of this as an environmental issue. Many express their distress and frustrations towards the rapid destruction of natural habitats and biodiversity and display empathy toward the orang-utans’ situation. One respondent wrote; “I don’t want to contribute to the death of beautiful orangutans” and another adds, “Everyone has the right to know the contents of the product that they are purchasing. Hiding the truth is not only deceiving, it's dangerous and irresponsible. Above all, these unique, beautiful creatures need our protection.”

We have also been able to gauge the attitudes of schools involved in the campaign through student and teacher feedback. The responses from students and teachers indicate positive feelings and enthusiasm about the campaign and willingness to tackling this important issue. Children seem to have a natural affiliation and connection with orang-utans and have eagerly expressed their support. In some instances students have taken the campaign into their schools, creating posters and giving talks at assemblies spreading the messages and gaining the support of their peers.

Certified sustainable palm oil

Mandatory labelling of palm oil in all relevant food products will give Australian consumers an opportunity to make an informed choice about whether the food products they purchase are contributing to the destruction of Orang-utan habitat. It will also help to drive consumer demand for palm oil from sustainable certified sources. Currently demand for palm oil from certified sustainable sources is very low (about 8 per cent of global supply) because consumers:

- do not know about the issue
- do not know if palm oil is in their food
- do not have the ability to demand palm oil from certified sustainable sources.

However, there is a more than adequate supply of RSPO certified sustainable palm oil to satisfy Australian demand, and in recent months sales of sustainable palm oil have increased. More than 200,000 tonnes of RSPO-certified sustainable palm oil or corresponding certificates have been purchased by consumer good manufacturers and retail companies in Europe and elsewhere. That volume amounts to 19 percent of the estimated 1,050,000 tonnes of palm oil that have been produced by certified mills and plantations since September

2008.¹⁰

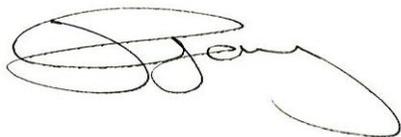
Recommendations

Zoos Victoria recommends that the House Economics Committee supports the passing of the Food Standards Amendment (Truth in Labelling – Palm Oil) Bill 2011 as it would be a fair and appropriate response to the expectations of the community and the needs of our environment.

Contact

Zoos Victoria would like to welcome the secretariat to share our submission with the public and would be willing to answer any questions that arise upon considering this submission. Zoos Victoria will appear and contribute to any inquiries related to the Food Standards Amendment (Truth in Labelling Laws – Palm Oil) Bill 2011. Please contact Jacquie O'Brien Acting General Manager of Communications, Zoos Victoria on 03 9340 2740 or Rachel Lowry, Director of Wildlife Conservation and Science, Zoos Victoria on 03 9340 2743 for further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jenny Gray', with a large, sweeping flourish extending to the right.

Jenny Gray
Chief Executive Officer

¹⁰ Roundtable on Sustainable Palm Oil (RSPO), Newsflash, 8 October 2009