

SUBMISSION 1

David

Thank you for the invitation to provide comment in relation to the Food Standards Amendment (Truth in Labelling—Palm Oil) Bill 2011.

Consumer Action Law Centre supports consumers having improved labelling of products containing palm oil. Many consumers are concerned about the environmental implications of their purchases, not only health and safety implications. As such, we support improved labelling of products so that consumers can make informed decisions about their purchases.

In general, Consumer Action believes that general consumer legislation (that is, the Australian Consumer Law in Schedule 2 of the Competition and Consumer Act 2011) should apply to all consumer markets broadly and that industry-specific regulation, such as food regulation, should be used to deal with labelling issues specific to that industry sector. This position is consistent with that recommended by the Productivity Commission in its review of consumer policy undertaken in 2008.

However, we also understand that products beyond food regulated by the Food Standards Australia and New Zealand Act 1991 may contain palm oil, such as cosmetics or cleaning products. We believe that such products should also have clear labelling. Given this, we are broadly supportive of amendments to the Australian Consumer Law to facilitate improved labelling of key ingredients that are of concern to consumers, such as palm oil.

Rather than the specific amendment proposed by the Bill, we believe the Australian Consumer Law should include a framework that promotes improved labelling generally. This could be done by a general provision that requires clear labelling of ingredients in consumer products. This could be supplemented by regulations that identify key ingredients that should be listed in certain products, such as palm oil in food and other consumer products.

Unfortunately, we would not be available on 19 August to attend the public hearing. However, I hope these comments are of use to the committee.

Kind regards

Gerard Brody
Director - Policy & Campaigns



Consumer Action Law Centre



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The Consumer Action Law Centre is an independent, not-for-profit, campaign focused, casework and policy organisation.