



Sunshine Coast Safe Communities Inc. (SCSC) is a secular, non-profit, community based incorporated association. Current membership is 600.

SUBMISSION TO THE SENATE INQUIRY INTO THE THIRD PARTY CERTIFICATION OF FOOD

Executive Summary

1. Halal Certification

- Halal Certification is an expensive and recurring cost to Australian businesses and consumers. It is so widely applied that consumers have effectively lost any choice to avoid paying for, and consuming Halal certified products.
- It is now applied to an ever increasing range of non food items without logical justification.
- Muslims comprised 2.5% of the Australian population at the last census; the 97.5% of non-Muslims are carrying the greater part of the financial burden to the benefit of a relatively small portion of the Muslim community.
- Halal Certification is claimed to be a religious requirement for Muslims, but operates effectively as like a slick international marketing exercise.
- The proliferation of Halal abattoirs has led to the loss of jobs for non-Muslims in the meat industry, and a “cartel like” hold on the domestic meat trade.
- Halal certification money has a huge capacity to contribute to Islamic extremism, and terrorism.

2. GMO Foods

- The safety issue of GMO foods is complex. It depends upon the level of modification and the purpose for which it is done.
- Some aspects of the use of GMO in food production are dangerous and unethical.

BODY OF SUBMISSION

This submission is specifically concerned with:

Major part: The proliferation and legitimacy of Halal certification, and recommendations as to the most effective way to reduce its deleterious effects on the non-Muslim community.

Minor part: The Safety of Genetically Modified Organisms, and GMO foods.

Halal Certification

SCSC supports consumers having reasonable access to food products that meet their dietary, ethnic and religious beliefs provided they do not seek to impose those requirements upon other citizens without their fully informed consent.

To understand Halal, it's necessary to have a basic understanding of the fundamentals of Islam. Muslims believe that the Quran is Allah's holy book, and is to be obeyed. References for what is Halal and Haram can be found in this book.

Ref: **"The Story of Mohammed - Islam unveiled"** by Australian author Harry Richardson.

The Quran and Halal

Islam's Holy Book the Quran does not provide any information that supports Halal Certification. On the contrary, the Quran states that all food is already Halal (permitted) with the exception of that which is Haram (forbidden). The only requirement for foods not mentioned as Haram is to give a prayer of thanks before consuming the food.

There are only four forbidden animal products:

- 1) animals that die of themselves (not slaughtered by man)
- 2) the blood of animals
- 3) the meat from pigs
- 4) animals dedicated to gods other than Allah

Alcohol is forbidden under all circumstances.

Islamic scholars are calling the act of Halal certification for anything other than that which is Haram, unlawful (Bid'ah), because the Halal certifiers are making their own laws above those of Allah's.

Ref: <http://www.dailymail.co.uk/debate/article-2623879/We-Muslims-appalled-sale-halal-meat-stealth.html>

The Australian Food and Grocery Council state that many food and drinks are inherently Halal. Therefore companies are paying a Halal certification fee for products Muslims are already allowed to eat.

Ref: <http://www.afgc.org.au/about-afgc/our-policies/halal-certification/>

The origins of Halal certification

The origins of Halal certification in Australia can be traced back to the 1960s, with an exponential increase since the 1980s. Ref: <http://pickeringpost.com/story/the-origins-of-halal-certification-schemes/4011>

Many non-Muslims strongly object to Halal certification. It's unnecessary and is funding an Islamic religious ritual totally irrelevant to the majority of Australians.

International Agenda

Stuart Robinson writes in his booklet called the "Challenge of Islam" that there was a resurgence of Islam under the Ayatollah Khomeini:

"Holy War means the conquest of all non-Muslim territories and this war is the duty of all Muslims. We shall **export our revolution** to the whole world."

- One method of exporting Islam is by demanding halal certification for all products consumed by Muslims throughout the world. If non-Muslims, in their ignorance, accept Halal certification as harmless, then they are being deceived. Indeed they are financing a religion whose publicly stated agenda is to replace every country's sovereign laws with those of Islam.
- In comparison, there are many other religions in our multicultural societies that do not force their beliefs upon the Australian citizen. In fact Halal certification is anathema to many citizens, whether they be Christians, Jews, Buddhists or Atheists. Hindus and Sikhs are strictly forbidden from eating Kutha meats (meats slaughtered in the Muslim way). We believe that the limitations or rituals of one religion should not be "forced" on any other or on secular people. The difficulty of avoiding Kutha meat for Hindus and Sikhs creates a difficulty for adherents as most meat available in butcher shops and supermarkets is seen as Kutha by them.

Ref: http://en.wikipedia.org/wiki/Kutha_meat

Certification Fees paid by food processors and/or manufactures and the potential for these to impact on prices to consumers

The fees charged for Halal Certification inevitably add to production costs. This is supported by evidence given in an Australian High Court decision involving the infringement of a registered trademark, which clearly shows the snowballing cost of Halal Certification to food processors and suppliers.

Ref: <http://www.judgments.fedcourt.gov.au/judgments/Judgments/fca/single/2014/2014fca0614>

Summary of Court Case Disclosure

The Australian High Court decision in the case FCA 614 Federal Court of Australia on 13th June 2014 clearly demonstrates the typical number of times that the food has to be declared halal under the Halal Certification Scheme as it moves through the production chain from farm to consumer:

- A. The products were initially purchased from Steggles the Chicken Processor which was certified halal by the Australian Federation of Islamic Councils.
- B. Further products were purchased from YCC Poultry which were certified by Halal Certification Authority Pty Limited.
- C. The wholesaler Quality Kebabs also required Halal Certification.
- D. The Kebab shop owners, the Sofra Pizza Pide & Kebab House also required Halal Certification.

The testimony evidence of Mr. El-Mouelhy of the Halal Certification Authority Pty Limited revealed their certification fee (without GST) for the wholesaler, Quality Kebabs was \$27,090 in 2012, \$33,580 in 2013 and \$34,510 in 2014.

These Federal Court Documents also show that the two small kebab retail outlets Sofra Pizza Pide & Kebab House should have paid the Halal Certification Authority Pty Limited a certification fee (without GST) of \$5000.00 each per year.

The court transcript doesn't reveal whether ancillary services such as transport, storage and packaging had to also be licensed at that time but this is becoming commonplace today. e.g.

A South Australian company Scholle Industries Pty Ltd, a Flexible Plastic Packaging Manufacturing Company is paying for Islamic Halal Certification services (AFIC) an undisclosed monthly fee for its seal of approval.

This clearly demonstrates that Halal Certification is no longer about what's permissible for Muslims, but is now about branding and stamping by Islamic certifiers for the financial benefit of the certifiers.

SCSC Comment: The case for packaging of Halal certified products in Halal certified containers is a stretch, as it would suggest each subsequent object that comes in contact with the food should also be certified. Certification of subsequent layers of packing and cartons is totally unwarranted.

It is considered that these requirements represent an opportunistic grab to needlessly increase the scale of certification and the income from fees.

Using health and safety standards as an excuse for double dipping to extend certification along the supply chain is not justified.



Further evidence of the cost to industry can be found in an extract from a report in the Daily Telegraph, Sydney on 2 June 2015;

“The Supreme Islamic Council of Halal Meat in Australia (SICHMA), which has a partnership with Coles, and Australian Federation of Islamic Council (AFIC) each collect close to \$1 million per year from halal operations.

As listed charities, both are eligible to receive GST concessions, income tax exemptions and the FBT rebate.

SICHMA received more than \$1.5 million last year from certification income and halal audits, adding to assets worth more than \$1.5 million.

AFIC, rebranded as Muslims Australia, has registered steady growth in halal revenue, collecting more than \$860,000 according to its 2012 financial statements.”

SCSC comment

1. We are concerned that not only are some Halal Certifiers earning considerable income, but a number are also listed as charities, granting them tax exemptions. This not only takes money out of the non-Muslim community without justification, but reduces taxation revenue.
2. We believe that because of the cost to consumers of Halal licensing and the public’s increasing doubt as to its legitimacy, the Government should audit the certifiers and the charities annually to determine exactly where the funds are going, and if not-for-profit and charity status are justified.

The need for labelling on products marketed by companies that pay certification fees

1. We are very concerned about the massive growth of Halal Certified products being sold to all Australians whatever their faith, often without their being informed or consulted. This started with meat products and has now spread to nearly all food production and manufacturing companies, packaging, and logistics companies.
2. Many Australians believe that by buying Halal certified products they are supporting the religious beliefs of a small minority. If they wish to avoid such products they must scrutinise the label of everything they purchase. This is frustrating and time-consuming. Worse still, some companies deliberately omit evidence of their participation in Halal certification so as to not alert non-Muslims who are the majority of their customers. A search of Coles’ and Woolworths’ websites using the key word Halal results in ‘no items found’. Yet both stock a multitude of halal certified products, some labelled by the manufacturer and others not labelled at all. A useful reference site is: www.halalchoices.com.au

SCSC comment.

It should be mandatory for all Halal certified products to be clearly and prominently labelled so as to give consumers a choice.

Regulation

Apart from Halal certification in abattoirs, the Halal licensing of Australian goods and services is largely unregulated by Government.

An informative website is The Islamic Council of Western Australia.

<http://www.islamiccouncilwa.com.au/halal-certification/halal-guidelines/>

Significantly, two of the conditions listed for Halal Certification for meats are already adequately addressed under Australian food slaughtering, processing, packaging, storage and transportation laws. These conditions relate to:

1. Hygiene.
2. Labelling of ingredients.

Muslims may insist that their hygiene and labelling criteria are different but they are essentially the same. In a country where Muslims are such a small minority it seems truculent for them to require special treatment at the expense of the majority.

SCSC Comment: Most of the companies supplying the domestic market are ‘jumping on the bandwagon’ for marketing purposes without consideration of the fact that they are possibly being ‘duped’ into paying for an unnecessary service, and indeed they may be financing the rise of extremist Islam.

Do current schemes provide enough information for Australian consumers?

Some examples of symbols of certification:



Although many of the logos are readily recognisable, we believe that there is insufficient Halal Certification information available to the Australian Consumer. Because not all Halal certified food is labelled, consumers who wish to avoid buying Halal products have to spend a lot of time searching online for products that are not Halal certified before going shopping. Those who don't have the internet are effectively excluded.

Evidence of exactly how many Australian companies are paying Halal certification fees is difficult to ascertain as some don't disclose it and others are either just signing up for the first time, or perhaps have decided not to renew. But it's believed to be more than 500. Ref:

<http://www.halalchoices.com.au/>

SCSC Comment: Current information on Halal certification is opaque. Many consumers do not know that Halal certification exists, or do not know enough to make informed decisions about its purchase and consumption. However they are unwittingly paying for it, and that's an injustice.

The importance of food certification schemes in relation to the Export market access and returns to producers.

Sunshine Coast Safe Communities accept that Halal certification is a requirement by many of Australia's overseas customers. This leaves little choice for those businesses that export to those markets.

Our view is that wherever possible, the customers who insist on Halal certified goods should be the ones to ultimately pay for it.

The extent and adequacy of information available to the public about certifiers, but not limited to, certification processes, fees, financial records; and related matters.

Halal Certification

Numerous Halal certifiers operate in Australia. The Department of Agriculture maintains a list of Islamic organisations that have an "Approved Arrangement" to certify halal meat for export. There are 21 such organisations operating in Australia as of November 2014.

However, Australian government regulation applies only to providers that certify meat for export. Much of this export grade meat may also end up in the domestic market.

While some Halal certification providers are associated with, or part of, larger Australian Islamic organisations, such as the Australian Federation of Islamic Councils, others are stand-alone businesses that provide local certification services. Ref:

<https://theconversation.com/explainer-what-is-halal-and-how-does-certification-work-36300>

Clearly certifiers have a huge financial incentive to claim the need for Halal certification of as many goods and services as possible. This leaves the door wide open to manipulation, exploitation, extortion and possible fraud at the expense of Australian consumers.

Discrimination in the Australian Workforce

The use of Muslim-only slaughtermen and Meat Inspectors may be a form of discrimination in the Australian workforce. This appears to be in breach of the Australian Constitution and a failure of the Australian Government to uphold Section 116. "*The Commonwealth shall not make any law for establishing any religion, or for imposing any religious observance*"

Extract from: Department of Agriculture.gov.au

Meat Notice 2009/08: Australian Government Authorised Halal Program - guidelines for the preparation, identification, storage and certification for export of Halal red meat and red meat products.

Last notice on this issue: 2004/07

Date of Effect: 01 June 2009

Date of Expiry: Until further notice

section 5.2 of the above meat notice

Only authorised Muslim slaughtermen can perform the Halal slaughtering procedure for Halal products. It is the competent Islamic slaughterman responsibility for identifying Halal or non-Halal carcasses in accordance with the procedures that are approved within the arrangement.

The following are extracts from:

THE ISLAMIC COUNCIL OF WESTERN AUSTRALIA (ICWA). ICWA – HALAL GUIDELINES.
INTRODUCTION

RULES FOR MUSLIM SLAUGHTERMEN REGISTRATION:

All new applicants for registration must be practising Muslims (such as observing five daily prayers, Friday prayer once a week, and avoiding the haram or forbidden things), reputable persons of good character, allowed to work in Australia, financial members of an Islamic Society and known to at least two prominent Australian Muslims who are prepared to write a reference about them. All Halal Slaughtermen will register with ICWA annually and obtain an Identity Card (I.D.) before they can Halal Slaughter.

Payment of prescribed registration fee.

Carry I.D. at all times while doing Halal Slaughter.

Registration as ICWA slaughtermen depends on approval of the person concerned by the ICWA Halal Committee. The actual registration as ICWA slaughtermen is done by the AUS-MEAT. This registration depends entirely on the approval/recognition of the persons concerned by the ICWA. Since it is ICWA approval which is sought, ICWA reserves the right to refuse approval of an application.

The abattoirs or factory must be under the close and constant supervision of a religious organisation, namely ICWA.

The premises, machinery and equipment must be classed according to Islamic Shariah (law) before any production takes place.

The slaughterman must be a mature, pious Muslim of sound mind who understands fully the fundamentals and conditions relating to Halal slaughter and be approved by the religious authorities.

SCSC Comment. The loss of slaughtermen's jobs largely in rural areas is a matter of deep concern. These men are apparently in many cases replaced with Muslims on special visas. As a large proportion of the meat from the Halal certified abattoirs remains in Australia, and is sold to customers who are unaware it is certified; or aware but have difficulty sourcing uncertified

meat. This is a disgrace. The meat is certified needlessly, hence these men lose their jobs needlessly, and the abattoir and consumers pay fees needlessly.

SCSC Recommendations for Halal Certification.

Members of SCSC have a limited understanding of the particular legal and regulation framework upon which changes can be carried out. We will therefore make recommendations without specifying how these changes will be affected.

- 1) The commission should summarise and release its findings and recommendations to the public. In particular these should include the following an estimate of the extra cost of living caused by the current Halal certification programs.
- 2) Our community would prefer to see most food items in the supermarket reflect the dietary requirements of the majority. Both non-Muslims and Muslims who do not require certification should not have to bear any costs associated with Halal certification.
- 3) Where certification is justified, the process must be fully transparent, consistent and accountable. It must be regulated by the appropriate Australian government agency or agencies. It must be undertaken only by appropriate, qualified personnel, accredited by a recognized Australian training institution. The process must not discriminate on any grounds against the Australian workforce. Compliance, inspection standards, fees and charges are to be uniform within Australia, and available as public information.
- 4) For food processors (excluding religious procedures involved with the act of killing), the conditions required to satisfy the certification standard for Halal content could be easily written into a set of scientific procedures and checklists. Any business or industry with access to an industrial chemist could easily self assess, and take the required steps for certification. This would lead to huge cost reductions, and a single reliable, reproducible certification system. A random inspection system would ensure that standards were actually being met.
- 5) Australia has some of the highest food production and processing standards in the world, applying at all points of the food chain from producer to retailer. These should not be diminished in any way to meet production, processing or handling stipulations of any religious faith. Health and safety issues should be the main priority.
- 6) Where possible, the cost of certifying should be borne by the community that requires certification. Australian certified goods for export are required to comply with the regulations of the importing country. Certification costs for export should be charged out specifically to export products and should not be borne by domestic consumers. Australian certified goods intended for export but

released onto the domestic market are to be correctly labelled according to local standards.

- 7) Charges are not to be transferred to non-certified products and thus aggregated against other consumers. Businesses that absorb certification fees as part of their general expenses are to report those costs as a separate line item in their financial records.
- 8) Certification businesses registered as not-for-profit or other charitable enterprises, or that pass those monies onto a religious entity should be subjected to ATO regulations and their financial records be available as public information.
- 9) Producers and processors must not be compelled to undertake certification by coercion, harassment or fraud. They must not be excluded from competing in any market where certification or duality of certification applies. This should be administered by the ACCC.
- 10) All packaged food products sold in Australia and subject to certification are to be clearly and legibly labelled as such in English. They are to be accompanied by a readily identifiable single logo standardized for use throughout Australia identifying the particular product certification, e.g. kosher, halal etc. Food products whose ingredients include certified items are also to be so labelled.
- 11) The failure to clearly label certified products per se, and also after their subsequent re-packaging, or travel in uncertified transport, or sale in uncertified premises, should be treated as fraudulent.
- 12) Non-packaged certified food products are to be similarly identified at the shelf point of sale.
- 13) Imported products should be required to fully meet and comply with Australian certification and labelling standards.
- 14) School canteens, hospitals and similar institutions who supply food to students, patients or other clients, should not be allowed to force the dietary patterns or eating restrictions of any minority religion or culture onto those attending.

SCSC Recommendations for General Food Certification

We recommend that the Government establish a National Governing Authority that would be responsible for approving, monitoring and auditing all religious and ethnic Licensors, with special powers to ensure:

1. The authenticity of the religious or ethnic group requesting certification and licensing.

2. The authenticity of such group's claims of the need for them to certify any product or service.
3. Investigate any cases of coercion or misrepresentation when certifiers "sell certification" on the basis of increased income, or fear of loss of income.
4. Carry out background checks of every person in the certification process and the licensing of Licensors.
5. Whether the licensing of any product or service would disadvantage or be morally injurious to persons of other religious or ethnic groups.
6. Whether the licensing of any product or service would impose an unnecessary financial cost to Australian citizens.
7. Takes over management of all halal certifiers, sets and collects the fees.

GMO Foods.

Genetic modification in the laboratory is a useful technology for fast-tracking what used to take years of interbreeding to achieve a desired commercial outcome. SCSC believes that it's acceptable if say a gene from wild wheat is inserted into domesticated wheat to give it greater drought resistance. But when scientists insert genetic material from an entirely different plant species, or even an animal, into a food plant, that's dangerous. Nobody could possibly know the long-term ramifications.

Jane Rissler of the Union of Concerned Scientists says: "The fact is, it has been done . . . DNAP [DNA Plant Technology of Oakland, California] was the company — that put the fish gene in a tomato." Rissler acknowledges that the experiment was halted before any products were brought to market, but, she insists, "that is because of the uproar. Believe me, they would be doing it if people were not objecting to it." ref:

<http://www.motherearthnews.com/real-food/adding-a-fish-gene-into-tomatoes-zmaz00amzgoe.aspx>

GMO Glyphosphate resistant plants.

Glyphosphate, marketed as Roundup and other brands was regarded as a miracle herbicide when introduced 40 years ago. It killed a wide range of grasses and weeds, so was ideal for roadsides, drains, pasture renovation and chemical fallowing of cropland. Even better it was touted to be very safe for humans.

It was also deadly to most food crops, especially grains. So it couldn't be used for weed control in those crops.

However, there were certain plants that were totally immune to glyphosate. These attracted the attention of scientists, who succeeded in determining which genes gave these plants resistance.

Several big agri-business corporations involved in both chemical manufacturing and seed production have inserted the genes from the glyphosate resistant plants into susceptible plants such as Wheat and Canola. Now growers can spray these food crops without them being damaged by the herbicide. They even use it a desiccant just pre-harvest to ensure the grain is dry enough to harvest.

Glyphosate residue soon showed up in foodstuffs that are consumed directly by humans, or by animals which are raised for human consumption. US and Canadian government regulations allow 20mg/kg of glyphosate in foods, but no-one really knows the longer term effect on humans and animals.

Consumers are becoming increasingly alarmed. Glyphosate is being detected in human milk and in the digestive tract of humans where it is believed to have a detrimental effect on beneficial flora. It has recently been categorised by the World Health Organisation as 'likely to cause cancer'. ref: <http://www.theguardian.com/environment/2015/mar/21/roundup-cancer-who-glyphosate->

US researcher Dr Anthony Samsel exposed the truth about dire warnings on the safety of glyphosate after using Freedom of Information legislation to access Monsanto records. This revealed that not only does glyphosate cause cancers, but Monsanto have known about it for 35 years.

- In those files of thousands of pages of data, Dr. Samsel found enough evidence that prompts him to say that glyphosate is not just a "probable" carcinogen - it is unequivocally a carcinogen. He is legally bound not to show the documents to anybody, but is allowed to say what he feels about them. Ref: <https://www.youtube.com/watch?v=13yO9VpjwLQ&feature=youtu.be>

GMO Labelling

GMO labelling of foods was first addressed in Australia in 2001. Since then there have been two reviews, which didn't make any changes. Ref: <http://www.foodstandards.gov.au/consumer/gmfood/labelling/Pages/default.aspx>

It is reported that currently over 60 countries require mandatory GMO labelling and the numbers are growing monthly.

GMO labelling is a complex issue.

- a) A minor genetically engineered modification from a closely related species is probably no different in effect from traditional cross-pollination techniques, and is most likely safe.
- b) A modification from a different species is a dangerous unknown that could establish a fearsome 'Frankenstein' organism in the environment.
- c) Modifications that are designed to impart weedicide resistance in a crop plant encourages farmers to use a new range of poisons for crop protection, which is not compatible with public health.
- d) Inevitably there will be great pressure applied by the chemical giants, seed distributors and farming groups for GMO foods derived from the new, pesticide-modified crops to be marketed to consumers in Australia.

SCSC Recommendations Regarding GMO.

1. Labelling standards for GMO foods need to be revised so consumers can be made aware of any potentially harmful genetic modification that any part of the food product has been involved in.
2. The risk with pesticide-manipulated GMO's is too high. We believe the Government should ban their importation, cultivation, and sale to consumers, or at least have a moratorium for five years so further studies can be made.
3. The Australian Government needs to urgently review labelling laws to ensure consumers are fully informed and protected from these potentially hazardous GMO foodstuffs.
4. If the Government does allow the sale of pesticide-manipulated GMO foods to Australian consumers we need clear, prominent labelling so the public can chose to avoid these foods.

Sunshine Coast Safe Communities Inc.
PO Box 794 Buderim, Qld 4556
www.sunnycoastsafe.com.au

Authorised by: Ron Hutchins, President