



1 August 2014

Coles Supermarkets Australia Pty Ltd  
ABN 45 004 189 708  
800 Toorak Road Hawthorn East Victoria 3123 Australia  
PO Box 2000 Glen Iris Victoria 3146 Australia  
☎ +61 3 9829 5111 🌐 coles.com.au

Committee Secretary  
Senate Rural and Regional Affairs and Transport References Committee  
PO Box 6100, Parliament House  
Canberra ACT 2600  
Australia

Email: [rrat.sen@aph.gov.au](mailto:rrat.sen@aph.gov.au)

Dear Mr Watling,

**INQUIRY INTO THE CURRENT REQUIREMENTS FOR FOOD LABELLING OF SEAFOOD AND SEAFOOD PRODUCTS (THE INQUIRY)**

Coles welcomes the opportunity to provide comment on the above Inquiry.

As a major national retailer with over 750 supermarkets across all States and Territories of Australia and more than 20 million customer transactions across our food and liquor business every week, we take our food labelling responsibilities very seriously.

Coles fully supports clear and uniform national food labelling to assist our customers in making informed choices.

Please find below our response to your specific Inquiry questions:

**(a) Sufficient information for consumers to make informed choices regarding sustainability and provenance:**

We believe the current Country of Origin Labelling (CoOL) requirements contained in Standard 1.2.11 of the Australia and New Zealand Food Standard Code are sufficient in terms of requiring businesses to provide information about the country or countries of origin of seafood.

However, we respectfully suggest the Australian Fish Names Standard AS SSA 5300 could be incorporated into existing labelling legislation (such as the Australia and New Zealand Food Standards Code) to ensure greater consistency in naming each species of seafood produced or traded in Australia. This is important from both a business and consumer perspective because we have found significant variances in naming of seafood not only by region, State/Territory within Australia, but also globally. For example, snapper in Victoria is a different species of fish to snapper in Western Australia.

**(b) Current traceability requirements:**

We note that there are already food traceability requirements contained in the Food Standards Code for the facilitation of food recalls.

**(c) European regulation (EU) No 1379/2013 Article 35:**

We understand the labelling requirements in the EU require additional information to be included on seafood labelling such as the catch area and gear type used for capture. We believe this information may not necessarily always be useful to consumers and could impose additional cost. As such, we respectfully suggest it should be up to each business to decide if they wish to include additional labelling information based on the individual wants of their customer base.

**(d) Need for consistent definitions and use of terms in product labelling:**

We believe it should be up to each business to determine what (if any) additional information they wish to provide on seafood labelling which is above and beyond the CoOL laws. In addition to CoOL we made a business decision based on our customer feedback to label all Coles Brand seafood using the Australian Fish Names Standard AS SSA 5300 and we also include information about whether the seafood is farmed or wild caught on our seafood labelling.

**(e) NT Country of origin legislation:**

We fully support a consistent national approach to seafood labelling to help facilitate national businesses deliver consistency in labelling for consumers and to help reduce complexities by having different State/Territory legislative approaches.

**(f) Common Language Group for defining sustainability:**

We support the introduction of consistent terminology for defining seafood sustainability. This will assist all stakeholders in the seafood industry (including manufacturers, retailers and government) to communicate in a consistent way that helps consumers understand the complex topic of seafood sustainability. Coles is participating in the Fisheries Research Development Corporation Common Language Group which is working on developing nationally consistent terminology for seafood sustainability.

**(g) Labelling laws for domestic & imported product competition:**

We believe all domestic and imported seafood sold in Australia should have CoOL to assist consumers make an informed choice about the origin of the seafood they purchase.

Yours sincerely

**Jackie Healing**

General Manager, Responsible Sourcing, Quality and Product Technology  
Merchandise Department  
Coles Supermarkets Australia