

To the Senate Standing Committees on Economics
PO Box 6100
Parliament House
Canberra ACT 2600

Honourable Members,

Inquiry into third party certification of food

The points I would like to cover in my submission are:

1. The proliferation and legitimacy of Halal certification.
2. The safety of Genetically Modified Organisms and GMO foods.
3. The associated licensing, labelling, costs, and impacts of Halal and GMO foods.

Submission Summary

1. Halal Certification

- Halal Certification is an expensive and recurring cost to Australian businesses and consumers.
- Muslims comprised 2.5% of the Australian population at the last census.
- Halal Certification is claimed to be a religious requirement for the sole benefit of Muslims.
- International Muslim researchers and scholars have declared that Halal certification is unnecessary and is not a requirement of Sharia law.

Conclusion

Halal Certification for the domestic market is an unnecessary and detrimental imposition upon Australian businesses and consumers. If it is to continue, it needs strict government legislation and supervision.

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.

Conclusion

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.

1. Halal Certification

I support 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. To be a Muslim is to believe and accept that Mohammed was a Perfect Human Being and that the Koran is Allah's holy book and is to be obeyed at all cost.

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

The Koran and Halal

Islam's Holy Book the Koran does not provide any information that supports Halal Certification. On the contrary, the Koran states that all food is already Halal with the exception of that which is Haram (forbidden). The only requirement for foods other than 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

Some Islamic scholars are calling the act of Halal certification for anything other than that which is harem, 'Bid'ah' (unlawful), 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 permitted to eat. Ref: <http://www.afgc.org.au/about-afgc/our-policies/halal-certification/>

International

It's well documented that the encroachment of Halal licensing is causing considerable unrest overseas, especially in the UK and Europe. But also in other countries. A report on ABC news stated:

'Islamic clerics announced the withdrawal of a halal labelling system for food in Sri Lanka on Monday "in the interests of peace" after protests from Buddhist groups.' ref:

<http://www.abc.net.au/news/2013-03-11/an-halal-labelling-withdrawn-from-sri-lanka/4566242>

- Muslims are 10% of the Sri Lanka population, as against Australia's 2.5%.

It's notable that the clerics withdrew certification voluntarily, which would indicate it really wasn't all that important to them.

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.

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 their religion 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 society 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). 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 was 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.



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.”

Conclusion

1. Not only are Halal Certifiers earning considerable income, but they are also listed as charities.
2. Because of the cost to consumers of Halal licensing and the public's escalating doubt as to its legitimacy, the Government should audit the certifiers and the charities annually to determine exactly what the funds are being used for.

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

1. I am 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, which is frustrating and time-consuming. Worse still, some companies deliberately omit evidence of their participation in Halal certification so as to not offend 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

Conclusion

I recommend that it 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 unregulated by Government.

An informative website for the researcher 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.

I believe that most of the companies supplying the domestic market are 'jumping on the halal bandwagon' for marketing purposes without consideration of the fact that they are

possibly being ‘conned’ 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, I 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/>

The current information on certification is opaque. Many non-Muslim consumers don't know what Halal certification is all about and don't pay particular care. But they are unwittingly paying for it, and that's a serious injustice.

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

Halal certification may be an appropriate strategy for exporters. But my view is that the customers who insist on Halal Certification should be the ones to 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.

1. Halal

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.

Certification providers that certify abattoirs which service only the Australian market do not come under any government regulation.

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. Because there is no Government regulation it leaves the door wide open to manipulation, exploitation, extortion and possible fraud at the expense of Australian consumers.

Conclusion

The Government should establish a National Governing Authority that would be responsible for approving, monitoring and auditing all religious and ethnic Licensors, with special powers to investigate:

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. Background checks of every person in the certification process and the licensing of Licensors.
4. Whether the licensing of any product or service would disadvantage or be morally injurious to persons of other religious or ethnic groups.
5. Whether the licensing of any product or service would impose an unnecessary financial cost to Australian citizens.

2. 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. In my view 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 Glyphosate resistant plants.

Glyphosate, 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.

Conclusions

1. The risk with pesticide-manipulated GMO's is too high. I 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.
2. The Australian Government needs to urgently review labelling laws to ensure consumers are fully informed and protected from these potentially hazardous GMO foodstuffs.
3. 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.

Acknowledgement

I thank the Senate Committee for this opportunity to state my views on the matters under consideration.