



ZOOS VICTORIA'S SUBMISSION TO SENATE ECONOMICS COMMITTEE

22 October 2009

**Inquiry into the Food Standards Amendment (Truth in Labelling Laws) Bill
2009**

Introduction

Zoos Victoria appreciates the opportunity to put forward this submission on the Food Standards Amendment (Truth in Labelling Laws) Bill 2009.

Zoos Victoria proposes that this Bill should go further to addressing the issue of food labelling in Australia, in particular that it should require Food Standards Australia New Zealand (FSANZ) to develop a standard that mandates the use of the words “palm oil” in the ingredients list of all packaged foods which contain any quantity of palm oil and palm oil derivatives regardless of whether or not the palm oil has been certified by the Roundtable on Sustainable Palm Oil (RSPO).

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 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. 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.

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

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

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

Zoos Victoria has had a behaviour change model in place that has been successfully trialed and evaluated across the organisation since 2005.

The Connect-Understand-Act model has been used to develop Zoos Victoria's highly successful behaviour change campaigns including the mobile phone recycling campaign, *They're Calling on You*. The same model has also been used to develop Zoos Victoria's current palm oil labelling campaign, *Don't Palm us Off*.

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 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 packaged food products they buy.

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'⁶. 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.⁷ 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.⁸

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

⁶ *Last Stand of the Oranutan*, United Nations Environment Programme (UNEP), 2007

⁷ Palm Oil Action Group, www.palmoilaction.org.au

⁸ 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>

Because palm oil is not explicitly labelled on food products 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.

Don't Palm us Off campaign

Zoos Victoria created *Don't Palm us Off* to focus public attention on the issue of palm oil, its prevalence in most food products, and the right of the public to be able to make an informed decision when buying food products. The goal of the campaign is to ensure the labelling of palm oil is mandatory in all relevant food products in Australia.

Don't Palm us Off postcards (Attachment 1) were printed and distributed at Melbourne Zoo so that Zoos Victoria could gather evidence to show that Australian consumers support the mandatory labelling of palm oil in all food products. An online version of this postcard is also available from www.zoo.org.au/palmoil.

A 30 second and 60 second Community Service Announcement (Attachment 2) was also produced for the campaign and this is currently airing on Network Ten and One Melbourne. The Community Service Announcement features Kim Watkins, (Host of Network Ten's 9am), George Calombaris (Network Ten's MasterChef Australia and Celebrity MasterChef) and Claire Hooper (Comedian and Team Captain on Network Ten's Good News Week). Network Ten is a strong supporter of the campaign and is airing the Community Service Announcement free of charge.

It's been just two months since the campaign launched at Melbourne Zoo on 16 August. In that time:

- 36,000 Australians have signed online or via postcard stating they support the mandatory labelling of palm oil on all relevant food products.
- 18,937 people have joined the Facebook cause and group calling for the mandatory labelling of palm oil on all relevant food products.
- 40 schools are officially involved in the campaign and are distributing and collecting completed postcards from their communities calling for the mandatory labelling of palm oil on all relevant food products.
- Celebrity endorsement from Kim Watkins, (Host of Network Ten's 9am), George Calombaris (Network Ten's MasterChef Australia and Celebrity MasterChef), Claire Hooper (Comedian and Team Captain on Network Ten's Good News Week), Brodie Harper (Channel Nine's Postcards), Heidi Valkenburg (Channel Nine's Kids WB), Kerrie Moulthaaan (Nova FM's Drive Time News), Josh Thomas (Network Ten's Talking 'bout Your Generation and comedian) and Tom Ballard (triple J).
- Community service announcement support from Melbourne's Community Radio Station 3RRR, Network Ten and advertising support from Southern Cross Lismore and Prime Lismore

- 1,537 people have viewed the campaign's Youtube clip calling for palm oil to be labeled on all relevant food products.
- Perth Zoo, Zoos South Australia, Taronga Zoo and Auckland Zoo are implementing the campaign in their respective states or regions.

Attitudes towards mandatory labelling

Through the 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. 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 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 mislead, 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 are more than willing to express their support (Attachment 3). 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 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. Today, 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 2008.⁹

Recommendations

Zoos Victoria recommends that the Bill be amended to require FSANZ develop a standard mandating the use of the words “palm oil” in the ingredients list of all packaged foods which contain any quantity of palm oil and palm oil derivatives regardless of whether or not the palm oil has been certified by the RSPO.

In addition we recommend a further amendment mandating the labelling of RSPO-certified palm oil in the ingredients list of food products.

Support for this submission

Please note this submission is supported by the Australasian Regional Association of Zoological Parks and Aquaria (ARAZPA).

Contact

Zoos Victoria would be happy to appear in front of the Senate Economics Committee Inquiry into the Food Standards Amendment (Truth in Labelling Laws) Bill 2009 to answer questions in relation to this submission. Please contact Jacque O'Brien, Corporate Communications Manager 03 9285 9481.

Yours sincerely,

Ms Jenny Gray
Chief Executive Officer

⁹ Roundtable on Sustainable Palm Oil (RSPO), Newsflash, 8 October 2009