

10 February 2020

Competition and Consumer Policy
Ministry of Business, Innovation and Employment
PO Box 1473
Wellington 6140

By email: consumer@mbie.govt.nz

**SUBMISSION on
Consumer Information Standards (Origin of Food) Regulations 2019**

1. Introduction

Thank you for the opportunity to make a submission on the Consumer Information Standards (Origin of Food) Regulations 2019. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

Contact: Aneise Gawn
Consumer NZ
Private Bag 6996
Wellington 6141
Phone: 04 384 7963
Email: aneise@consumer.org.nz

2. Comments

In general, we support the proposed wording of the regulations. However, we consider the following clauses require amendment or clarification:

Clause 4 – Definition of fruit or vegetable

The drafting excludes "legumes", except those specified in (b). This exclusion means products such as alfalfa sprouts and mung beans (typically sold in the fresh produce section of supermarkets) would not require labelling. We suggest the definition is broadened to include these products.

We assume edible flowers would be covered by the regulations. If so, we suggest these are listed in (b) to avoid confusion.

Clause 7 - Definition of minimally processed

We consider the definition should include meat products that have water injected.

For meat treated with flavourings or marinades, and products such as sausages, we consider that, at a minimum, origin labelling should be required for the actual meat content of these products.

Clause 9 – Information that must be disclosed

We support the meaning of “grown” in clause 9(2) and consider it should address the issue of mushrooms grown on imported Chinese “logs” being labelled as “New Zealand grown”.

Clause 10(2)(b) – General requirements for disclosing information

We support the requirement for origin information to be clear and legible. However, we also consider it should be sufficiently prominent. We also recommend the words “of origin” are added to the end of clause 10(2)(b).

Clause 11 – Disclosure in most cases

We consider the wording of clause 11 could be improved. In particular, clause 11(1) refers to the supply of regulated food “where the food is located”. It may be clearer to refer to “in-store purchases”.

Thank you for the opportunity to make a submission on the regulations. If you require any further information, please do not hesitate to contact us.

Yours sincerely

Aneleise Gawn
Consumer Advocate