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Evaluation of Country of Origin Labelling for Food: Discussion Paper

About this submission

The George Institute for Global Health is pleased to contribute this **confidential submission** to the Evaluation of Country of Origin Labelling for Food consultation.

We welcome the opportunity to further engage with the Department of Industry, Science, Energy and Resources, and the Australian Competition and Consumer Commission, on this important issue.

About The George Institute for Global Health

The George Institute is a leading independent global medical research institute established and headquartered in Sydney. It has major centres in China, India and the UK, and an international network of experts and collaborators. Our mission is to improve the health of millions of people worldwide by using innovative approaches to prevent and treat the world's biggest killers: non-communicable diseases (NCDs) and injury.

Our work aims to generate effective, evidence-based and affordable solutions to the world's biggest health challenges. We research the chronic and critical conditions that cause the greatest loss of life and quality of life, and the most substantial economic burden, particularly in resource-poor settings.

The George Institute's food policy team works in Australia and overseas to reduce death and disease caused by diets high in salt, harmful fats, added sugars and excess energy. The team does multi-disciplinary research with a focus on outputs that will help government and industry deliver a healthier food environment for all. The George Institute has been designated a World Health Organization Collaborating Centre on Population Salt Reduction, with a remit to support countries to achieve global targets for reducing salt by 30% by 2025.

The George Institute established a mobile application (app) called FoodSwitch. This app can be easily downloaded on your mobile phone and empowers consumers to make better food choices by providing simple health information on a scanned product and suggesting healthier alternatives to 'switch' to. FoodSwitch is a growing database of nutrition and labelling information describing packaged and restaurant foods. It enables us to analyse changes in the healthiness of the food supply provided to more than a billion people around the world.

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Research on Country of Origin Labelling

The George Institute's FoodSwitch database contains data on food packaging and nutrition composition for around 80,000 products in the Australian food supply.

Each year, we send trained data collectors into four metropolitan Sydney supermarkets (one each of Woolworths, Coles, IGA and ALDI) to systematically collect all products available (approximately 23,000) via a bespoke mobile phone application. Product images are then uploaded and data extracted by a trained data entry team. Information extracted includes the barcode, product name, brand, nutrition content, package size, health and nutrient content claims, front-of-pack labelling (i.e. Health Star Rating) and Country of Origin Labelling (CoOL).

We have been tracking CoOL since 2016, and have thus captured data since the start of CoOL implementation. We have assessed compliance with updated requirements on the 2019 dataset. Where a product appeared in more than one size (i.e. 375mL can and 600mL bottle of the same drink), each size was counted as an individual product. This approach captures the number of unique product packages updated by manufacturers to accommodate new labelling requirements.

All FoodSwitch products were considered eligible for CoOL except vitamins and supplements, which are *explicitly excluded* from new regulations. We have examined compliance amongst 'priority' products as classed by the guide, as well as compliance amongst non-priority products. The latter category includes alcohol, beverage mixes, biscuits, coffee and tea, confectionery, cordials, crisps and snacks, dessert toppings, electrolyte drinks, energy drinks, herbs and spices, ice cream and edible ices, ice cream cones, soft drinks, sports powders and gels, and waters (plain and flavoured).

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Key Findings

Compliance over time

Since introduction of the CoOL policy in 2016, compliance has significantly increased over time, as outlined in Figure 1.

In 2019, we recorded 15,134 priority food products. Of these, 13,846 (91%) products exhibited CoOL. We recorded a further 5,599 products that were classified as non-priority, of which 2,353 (42%) exhibited CoOL.

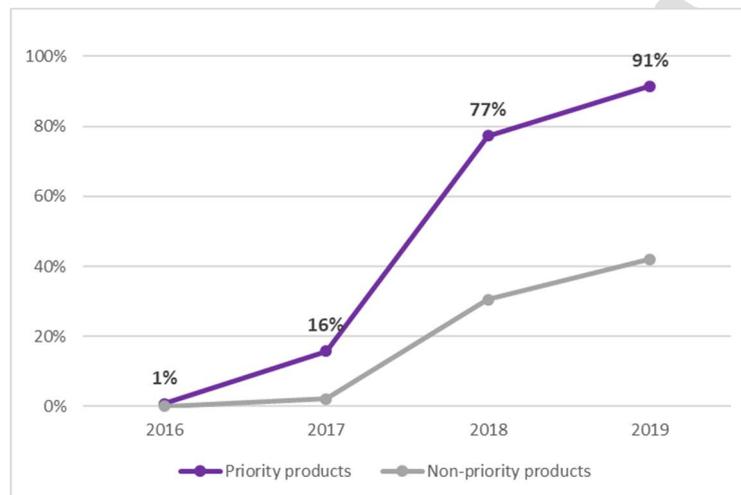


Figure 1: CoOL compliance over time

Compliance type amongst priority products in 2019

Type of CoOL displayed by 'priority' products:

- 12% of products displayed a 'grown in' or 'produced in' Australia label.
- 48% of products displayed a 'made in Australia' label. These products were made mostly from Australian ingredients but also sometimes from imported ingredients.
- 7% of products displayed a 'packed in' Australia label.
- 24% displayed a label indicating they were imported.
- 9% were not yet displaying CoOL. These may be genuine instances of non-compliance, or some of these products may be able to argue they are in 'non-priority' categories.

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Compliance type across broad food and beverage categories amongst priority and non-priority products in 2019

Products such as eggs, meat, fruit and vegetables and sugars/honey were more likely to be grown or produced in Australia, as outlined in Figure 2. A large proportion of products in the non-priority categories of beverages, snacks and confectionery did not display CoOL.

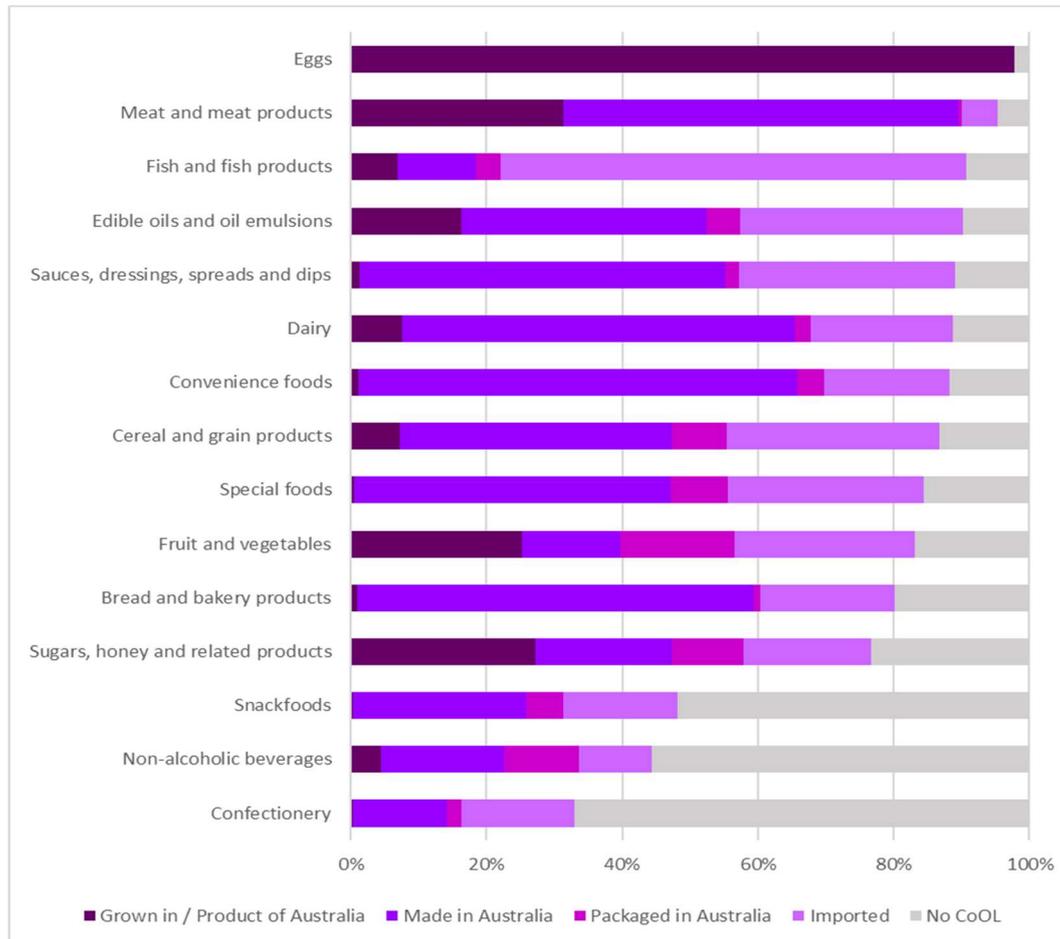


Figure 2: CoOL compliance type across food and beverage categories in 2019

Further research by The George Institute may include an analysis by company to provide more detailed insights into areas of compliance and non-compliance.

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Contact

Professor Simone Pettigrew
Program Head, Food Policy
The George Institute for Global Health
M 0428 888 202 | E spettigrew@georgeinstitute.org.au

Chelsea Hunnisett
Policy and Advocacy Adviser, Global Advocacy & Policy Engagement
The George Institute for Global Health
M 0426 439 947 | E chunnisett@georgeinstitute.org.au

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