



Competition and Consumer Policy
Ministry of Business, Innovation and Employment
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Consumer Information Standards (Origin of Food) Regulations 2019

Kia ora koutou,

Thank you for the opportunity to respond to the draft Consumer Information Standards (Origin of Food) Regulations 2019.

The Consumers' Right to Know (Country of Origin of Food) Act 2018 affords consumers the ability to make more informed choices about the provenance of their food choices. Our relationship with food is one of the most important we have.

Food reflects who we are, how we live, and the cultures that shape us. What we eat defines our health, our relationship with the environment, with the places we choose to live and the people we engage with. It is a strong determinant of our future. And as the way we eat, and what we eat, changes faster than ever, it is so important that these regulations offer a strong framework to help consumers understand the journey their food took from farm to plate.

The New Zealand pork industry is well positioned to lead the world in higher welfare, environmentally sound pork production. Our unique temperate climate, free draining soils and strong regulatory welfare framework set us apart from many other pork-producing nations. Pork farmed in New Zealand contains fewer antibiotics because our herd is free from many of the diseases present in foreign farms. The 2015 ban on sow crates mean producers are closer to maintaining social license for pork production that allows pigs to demonstrate their natural behaviours. Many farms with outdoor production systems employ regenerative principles to keep animal manure from overwhelming the soil, and protecting waterways, while generating rich natural compost for use in both on farm and other commercial applications. And there are emerging opportunities to take a circular economy approach to feed production by working with other producers in the agricultural industry to utilise their waste streams.

Freedom Farms work with a group of eight farms who lead the market in higher welfare, environmentally conscious pork production. We're incredibly proud to support them. But over the past thirteen years we have seen the whole industry grapple with how to compete with high volume, low value pork imports – they've been fighting an uphill battle. It doesn't matter how world-class our production systems are, because consumers overwhelmingly think that the 'fresh' product they are purchasing is sourced locally. More than 60% of it is farmed overseas. Pork imports to New Zealand now exceed 50 million kilograms each year. Just twenty-five years ago – one generation of New Zealanders – only 8% of pork was imported.

We applaud the inclusion of bacon and ham in the proposed regulations. Our experience is that smallgoods are most prone to tricky practices where the processing country is given precedence over the country where the pigs were farmed. More than 80% of smallgoods are manufactured in New Zealand from imported pork, so this is a significant improvement on the status quo.

But the definition of 'minimally processed,' as it has been proposed, undermines the whole spirit of the Act.

Like many Western countries, New Zealand has growing demand for 'value-added' products – those which are sold in a marinade, flavoured, reformed into products like meatballs or burger patties, on kebabs, or even pre-cooked. There is also consumer demand for 'moisture-enhanced' pork, injected with brine, to achieve a more tender and flavourful eating experience. The industry estimates there is currently 520,000 kilograms of processed pork products that exceed the definition of 'minimally processed', without being smallgoods, sold in New Zealand each year. As the draft regulations are currently worded, all of these goods will sit on shelves alongside NZ farmed pork, with a New Zealand manufacturing address – not disclosing the country of origin of the pork itself. This creates an easily exploitable loophole, in which importers and manufacturers will ensure that their products surpass the 'minimally processed' threshold without transforming products specifically into ham or bacon.

We support calls by the NZ Pork Industry Board to amend the definition of pork products to include

"...processed pork products that contain or are made of at least 30% pork flesh, cooked or uncooked; and (a) are represented for sale as ham or bacon; or (b) contains ingredients for the purposes of preservation, flavouring, moisture enhancement, tenderising, yield extension or reforming; or (c) is represented for sale as a sausage."

In the face of climate change, biodiversity loss, soil erosion and the destruction of ecosystems as a result of intensive international factory farming practices, New Zealand has potential to lead the world in high welfare regenerative agriculture. For pork producers, who work with mono-gastric livestock, without the immense challenge of methane gas belching faced by ruminant farmers, the possibilities are even greater. One in three New Zealanders are reportedly reducing their meat consumption to mitigate greenhouse gas emissions. This is the moment where we get to build a framework that will ensure all consumers can make informed choices about the impact of their food purchases in coming generations.

We thank you for taking the time to fully understand the implications of these regulations, and adapting them to give New Zealand consumers the best and most robust information going forward.

Kind regards,



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