

13 November 2015

Manager Consumer Policy Unit Small Business, Competition and Consumer Policy Division The Treasury Langton Crescent PARKES ACT 2600

Dear Mr Storer

RE: FREE RANGE EGG LABELLING CONSULTATION PAPER

I refer to the recent release of the consultation paper seeking comments on proposed options relating to free range egg labelling. Safe Food Production Queensland (SFPQ), as Queensland's food safety regulatory body which manages food safety in the egg production sector amongst other sectors, has some issues with the elements of the document.

It is noted that the object of the consultation paper is purported to improve consumer confidence through labelling i.e. marketing. It is also noted that the consultation paper acknowledges that food safety practices are best addressed through separate legislation and schemes. However, it is SFPQ's view that many of options noted in the paper, if implemented, will result in significant changes to production practices and systems within the egg industry, which can compromise both food safety and biosecurity (e.g. through the spread of avian influenza).

I would therefore strongly urge the ACCC to engage directly with State and Territory food safety and biosecurity agencies during the policy development process to ensure that current food safety and biosecurity standards are not impacted.

Regards

Phil Pond

General Manager – Compliance, Strategy and Response Safe Food Production Queensland