

29 March 2016

Project Officer Labelling Review
Food Standards Australia New Zealand
PO Box 10559
The Terrace
WELLINGTON 6036

Dear Sir/Madam

Consultation Paper – Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food.

Thank you for the opportunity to comment on this Consultation. The Ministry for Primary Industries (MPI) has the following comments to make.

General comments:

MPI acknowledge that the purpose of labelling of irradiated foods and ingredients is to provide consumers with information rather than for safety reasons. However, given the relatively low presence of irradiated foods and ingredients in the New Zealand market to date, MPI support maintaining the requirement to label these foods at this time. Consumer education about irradiation of foods and monitoring of consumer attitudes to irradiated foods would allow the ongoing need for such labelling to be assessed over time.

Answers to specific questions: (Note MPI has only answered those questions that are appropriate for its input)

Q6. Do you think the current labelling requirement for all foods permitted to be irradiated should be removed?

No. MPI does not think the current labelling requirements for all foods permitted to be irradiated should be removed. While the safety of food subject to irradiation is not in question, the fact that the use of irradiation in the New Zealand food supply has been relatively low to date means consumer comfort with irradiation, as a form of food processing, is uncertain. It is possible that use of irradiation for different purposes may have different levels of consumer acceptance. For example, there may be a greater desire from consumers for labelling where the purpose of irradiation is to treat the food (eg to extend shelf life) and a lesser demand where low dosages are used to treat insects, (such as fruit fly used as an alternative to chemical treatments). However, MPI is not aware of any evidence of consumer views with regard to the irradiation of foods and recognises that this consultation asks stakeholders to provide any such evidence they are aware of. If the level of evidence on consumer attitudes to irradiation is limited,

MPI would recommend FSANZ commission work in this area to further inform this review. MPI would also recommend a cautious approach be taken until such work has been completed.

Q7. If labelling was to continue for irradiated whole foods, do you think restaurant meals containing irradiated ingredients should still be labelled?

No. The requirement for labelling of restaurant meals where they contain irradiated ingredients is inconsistent with, and goes further than, the requirements in the Code for ingredients that have undergone other processing methods. For example there is no requirement to label restaurant meals that contain ingredients that have been genetically modified. In addition it is very difficult to monitor compliance with such labelling requirements.

Q8. If labelling was to continue for packaged foods containing irradiated ingredients, do you think the irradiated ingredients should still be labelled?

Yes. It would be inconsistent to require whole foods which have been irradiated to be labelled if foods containing irradiated ingredients were not required to be labelled. It may be prudent however to consider a threshold level for an irradiated ingredient below which labelling would not be required. Alternatively, there may be an argument to exempt herbs and spices used as an ingredient in foods as they are usually only a minor ingredient. Labelling has been a barrier to using irradiation to control microorganisms in herbs and spices. Other types of treatment can have a major effect on the quality of the spices eg heat or steam (since permissions to use ethylene oxide fumigation were removed).

Thank you for the opportunity to provide feedback on the consultation paper.

Yours sincerely


Manager Food Science and Risk Assessment