

**Supporting document 4**

Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food

International food irradiation labelling requirements

The Codex General Standard for the Labelling of Pre-packaged Foods[[1]](#footnote-2) (the Codex Standard) was adopted in 1985. It specifies that the label of a food which has been treated with ionizing radiation shall carry a written statement indicating that treatment in close proximity to the name of the food. The use of the international Radura symbol is optional. Where the Radura symbol is used, it should be located in close proximity to the name of the food. For processed foods in which irradiated product is used as an ingredient, the Codex Standard specifies that the irradiated product should be so declared in the list of ingredients.

Labelling requirements vary between individual countries and in some case the requirements are unclear. FSANZ has identified the requirements for food irradiation label information in the United States of America (USA), Canada, the European Union, Indonesia, Malaysia, Vietnam, and South Africa. Most of these countries appear to have based their requirements on the Codex Standard, although some variations occur. Table 1 summarises the Codex specifications and international requirements for food irradiation labelling.

For irradiated whole foods that are packaged, it is common to require a mandatory statement to indicate that the food has been irradiated. Some countries prescribe the wording of the statement or statements that may be used, and may or may not require the international Radura symbol to be used. One country (Indonesia) also requires the objective of irradiation (i.e. the purpose) to be included.

For packaged foods that contain an irradiated ingredient(s), most countries require that the ingredient(s) be identified on the label as irradiated, usually in the list of ingredients. However, some countries (e.g. Canada, Malaysia) exempt the irradiated ingredient from being declared as such, if it is present in the final prepackaged food in amounts below an agreed threshold (e.g. in Canada, an irradiated ingredient that constitutes less than 10 per cent of the prepackaged food does not need to be identified as ‘irradiated’).

In the United States of America, irradiated ingredients or components do not have to be identified on the label; labelling only applies when the whole food has itself been irradiated.

Most of the overseas requirements identified by FSANZ require specific signage for unpackaged foods that have been irradiated (e.g. whole produce) and are sold in bulk. The wording of the statement and the use of the international Radura symbol are often prescribed, similar to irradiated whole foods that are packaged. The US permits each item of food to be individually labelled as an alternative to the counter sign or shelf label. Codex requirements for unpackaged foods are specified in the General Standard for Irradiated Foods[[2]](#footnote-3) The words ‘irradiated’ or ‘treated with ionising radiation’ and the international Radura symbol must appear together with the name of the irradiated product when it is sold in bulk.

**Table 1: Codex specifications and other overseas requirements for food irradiation labelling**

|  | **Irradiated whole foods that are packaged**  | **Packaged foods that contain an irradiated ingredient** | **Unpackaged irradiated foods** |
| --- | --- | --- | --- |
| Codex[[3]](#footnote-4) | The label of a food which has been treated with ionising radiation shall carry a written statement indicating that treatment in close proximity to the name of the food. The use of the international food irradiation symbol is optional, but when it is used, it shall be in close proximity to the name of the food. | When an irradiated product is used as an ingredient in another food, this shall be so declared in the list of ingredients. | In the case of products sold in bulk to the ultimate consumer, the international logo and the words “irradiated” or “treated with ionizing radiation” should appear together with the name of the product on the container in which products are placed.[[4]](#footnote-5) |
| Australia / New Zealand | If the food has been irradiated, a statement to the effect that the food has been treated with ionising radiation. | If the food has an ingredient or a component of a food that has been irradiated – a statement to the effect that the ingredient or component has been treated with ionising radiation. | If the food has been irradiated, this must be stated in the labelling that accompanies the food or is displayed in connection with the display of the food. |
| United States of America[[5]](#footnote-6) | The label and labelling of retail packages of foods irradiated…shall bear a logo (see below) along with either the statement ‘treated with radiation’ or the statement ‘treated by irradiation’. The logo shall be placed prominently and conspicuously in conjunction with the required statement.  | The labelling requirement applies only to food that has been irradiated, not to a food that merely contains an irradiated ingredient but that has not itself been irradiated. | For irradiated foods not in a package, the required logo and statement “treated with radiation” or “treated by irradiation” shall be displayed to the purchaser with either 1. the labelling of the bulk container plainly in view, or
2. a counter sign, card, or other appropriate device bearing the information that the product has been treated with radiation. As an alternative, each item of food may be individually labelled.
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| Canada[[6]](#footnote-7) | Irradiated foods that are prepackaged must include a written statement and the international Radura symbol. Acceptable written statements to accompany this symbol include:(i) "irradiated"(ii) "treated with radiation" or 1. "treated by irradiation"

Or a written statement that has the same meaning. | An ingredient or component of a pre-packaged product that has been irradiated shall, if the food constitutes 10 per cent or more of the pre-packaged product, be included in the list of ingredients and preceded by the statement “irradiated”. | Where an irradiated food is not a prepackaged product and is offered for sale, a sign that carries the international Radura symbol shall be displayed immediately next to the food.The symbol shall appear in close proximity on the sign to one of the following statements or a written statement that has the same meaning:(a) “treated with radiation”;(b) “treated by irradiation”; or(c) “irradiated”. |
| European Union[[7]](#footnote-8) | If the products are sold as items, the words “irradiated” or “treated with ionising radiation” shall appear on the label as provided for in Article 5(3) of Directive 79/112/EEC. | If an irradiated product is used as an ingredient, the words “irradiated” or “treated with ionising radiation” shall accompany its designation in the list of ingredients.By way of derogation from Article 6(7) of Directive 79/112/EEC, the same words shall be required in order to indicate the irradiated ingredients used in compound ingredients in foodstuffs, even if these constitute less than 25% of the finished product. | In the case of products sold in bulk (and products in which an irradiated product is used as an ingredient), the words “irradiated” or ‘treated with “ionising radiation” shall appear together with the name of the product on display or notice above or beside the container in which the products are placed. |
| Indonesia[[8]](#footnote-9)  | On label of processed food experiencing irradiation treatment, the following shall be contained:1) the words “IRRADIATED FOOD” and the2) objective of irradiation.In addition to the inclusion of information, as referred to in 1 and 2, the international Radura symbol may be included on the label. | In case that processed food contains materials which experience irradiation treatment, the label shall only state information on irradiation treatment on the irradiated material concerned. | Unknown. |
| Malaysia[[9]](#footnote-10) | A package containing irradiated food for sale shall bear on it one of the following written statements:1. “Treated with ionizing radiation”
2. “Treated with irradiation”
3. “Treated by irradiation”, or
4. “Irradiated” , and include

the international food irradiation symbol. | Irradiated food which is used as an ingredient in another food and constitutes more than 5% of the content of that food must include the declaration “irradiated” in the ingredient list. | Where irradiated food other than in a package is displayed for retail sale, one of the following statements shall be displayed on or in connection with the display of the food:1. “Treated with ionizing radiation”
2. “Treated with irradiation”
3. “Treated by irradiation”, or
4. “Irradiated” , and include

the international food irradiation symbol. |
| Vietnam[[10]](#footnote-11) | Food products being manufactured, processed and preserved with the use of irradiation technique must be described with the line “Irradiated foods” or displayed on labels an image of irradiated foods according to the international food irradiation system agreed to be put into practice by Vietnam. | Food products being manufactured, processed and preserved with the use of irradiation technique must be described with the line “Irradiated foods” or displayed on labels an image of irradiated foods according to the international food irradiation system agreed to be put into practice by Vietnam. | Unknown. |
| South Africa[[11]](#footnote-12) | All containers of irradiated foodstuffs shall be labelled with the international Radura symbol together with one of the following words: “Irradiated” or “Radurised”. | In the case of foodstuffs containing an irradiated component(s) in more than 10% of the mass of the finished product, the words “Irradiated” or “Radurised” shall appear opposite the relevant component(s) in the list of ingredients. Use of the international Radura symbol is optional. | Where bulk containers of irradiated foodstuffs are opened at the point of sale in such a manner that thereafter the statement is obscured from the consumers’ view, a notice with the following words “Irradiated” or “Radurised” shall be displayed in immediate proximity to such a food stuff and in clear view of the purchaser*.* |

1. CODEX STAN 1-1985 <http://www.codexalimentarius.org/standards/list-of-standards/> [↑](#footnote-ref-2)
2. CODEX STAN 106-1983, REV. 1-2003 <http://www.codexalimentarius.org/standards/list-of-standards/> [↑](#footnote-ref-3)
3. General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985) [↑](#footnote-ref-4)
4. General Standard for Irradiated Foods (CODEX STAN 106-1983, REV.1-2003) [↑](#footnote-ref-5)
5. US Food and Drug Administration Code of Federal Regulations Title 21 CFR 179.26 [↑](#footnote-ref-6)
6. Section B.01.035 of the Food and Drug Regulations (CRC., c.870) Canada [↑](#footnote-ref-7)
7. Directive 1999/2/EC of the European Parliament and of the Council of 22 February 1999 on the approximation of the laws of the Member States concerning foods and food ingredients treated with ionising radiation. [↑](#footnote-ref-8)
8. Republic of Indonesia Regulation No. HK 03.1.5.12.11.09955 of 2011 concerning processed food registration [↑](#footnote-ref-9)
9. Guidelines on Labelling of Irradiated Food (Regulation 13, Food Irradiation Regulations 2011) Ministry of Health, Malaysia [↑](#footnote-ref-10)
10. Joint Circular: Guiding the goods label for some foods, food additives and aids for processing packaged foods, issued by the Vietnam Ministry of Health, Ministry of Agriculture and Rural Development, and Ministry of Industry and Trade on October 27, 2014 promulgating Detailed Guidelines on Labelling of Pre-packed Food, Food Additives, and Food Processing Aids [↑](#footnote-ref-11)
11. Regulations governing the labelling and advertising of foodstuffs, to section 15(1) of the Foodstuffs, Cosmetics and Disinfectants Act 1972. South Africa. [↑](#footnote-ref-12)