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Standards Management Officer

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Submission on the labelling review recommendation 34 – Irradiation labelling

1. About AUSVEG

AUSVEG is the national Peak Industry Body representing the interests of Australian vegetable and potato growers. We represent growers around Australia and assist them by ensuring the National Vegetable Levy and the National Potato Levies are invested in research and development (R&D) that best meets the needs of the industry.

AUSVEG represents vegetable and potato growers to ensure their interests and concerns are effectively communicated to all levels of government, in the public sphere, and throughout relevant areas of the private sector.

2. Queries

For more information regarding this submission please contact AUSVEG National Manager – Scientific Affairs, [REDACTED]

Yours sincerely

A large black rectangular box redacting the signature of Richard J Mulcahy.

Richard J Mulcahy
Chief Executive Officer

3. Preamble

AUSVEG welcomes the opportunity to provide comment to Food Standards Australia New Zealand (FSANZ) on the review of mandatory labelling of irradiated food.

In particular we will focus this submission on the understanding and view of irradiated food from the perspective of the Australian vegetable industry. AUSVEG will directly address the questions FSANZ asked of stakeholders.

4. Questions posed for stakeholders

1. What information (for examples, studies, data or consumer feedback) can you provide on consumer awareness, understanding and behaviour, in response to labelling about food irradiation?

AUSVEG has not conducted any studies directly addressing consumer awareness, understanding and behaviour in response to food irradiation labelling. AUSVEG understands that the average consumer often does not have a good understanding of the scientific basis when it comes to irradiation in terms of effects, benefits or use.

2. Do you purchase, or would you consider purchasing, irradiated food?
- if yes, then why?
- if no, then why not?

AUSVEG understands that the technology is sound, safe and effective, and that it has been used safely for over 50 years with no negative effects observed.

Irradiation is a highly efficacious method of sterilisation that is especially important for fruiting produce addressing fruit fly pest issues and aiding market access.

3. Does the current labelling requirement for irradiated food (see box below) provide enough information for you to make an informed choice about the food you buy?

Labelling requirement: If the food, ingredient or component of a food has been irradiated, a statement to the effect that the food, ingredient or component has been treated with ionising radiation is required.

No, AUSVEG recognises that it is a statement that describes what has happened. However, it does not provide comment on the safety and efficacy of the sterilisation technique. The process has been examined thoroughly by several international bodies, all of which have determined it is completely safe.

4. What are your views about the wording of the statement not being prescribed?

AUSVEG believes that the statement, if required at all, does not describe irradiation properly. An example of a different area that does not require labelling and where consumers do not have a good knowledge of is chemical use and residues. Most produce still has chemical residues, however we do not have to place statements describing that the food, ingredient or component of a food has been treated with a chemical product. AUSVEG understands that consumers are often unaware of the fact that FSANZ and the Australian Pesticides and Veterinary Medicines Authority (APVMA) work hard to determine average dietary intake, where the chemical product is used, how often, and therefore develop appropriate Maximum Residue Limits accordingly.

Asking for a statement on irradiated food, now that it has been proven to be effective and safe for over 50 years, is similar to asking for a statement of chemical use on produce, i.e. it is irrelevant.

5. What are your views about the voluntary use of the Radura symbol?

AUSVEG considers that if the requirement for irradiated foods to be labelled is continued, the Radura symbol may be practical to use instead of a written description.

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

- if yes, then why?
- if no, then why not?

Yes AUSVEG concludes that the current labelling requirements for all foods permitted to be irradiated should be removed.

AUSVEG understands that there is no need or cause to label irradiated foods, as it has been deemed safe over a long period of time. Consumers may perceive a label on irradiated foods as a warning, rather than a statement of fact. Managing the regulatory requirement is procedurally difficult and costly. As FSANZ has proven the technology to be safe, there is no cause or reason to require mandatory labelling of irradiated foods just as there is no cause or reason to require mandatory labelling of foods treated with chemical products, heat treatment or cold treatment.

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

AUSVEG believes that if labelling was continued for irradiated whole foods, there is no need for restaurant meals containing irradiated ingredients to require labelling. For example, depending on how the food in the restaurant is cooked, it may have been irradiated, such as through a microwave. This method of cooking is proven safe, and does not require labelling, much like how irradiation of foods has also been proven safe and should not require labelling.

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

AUSVEG does not believe that any labelling of irradiated produce is required or needed, for the reasons already outlined in previous answers.

16. Have you conducted any consumer research or received consumer enquiries about irradiated food? If so, are you able to provide the research to FSANZ?

No, AUSVEG has not conducted any consumer research directly relating to irradiated foods.

17. Do you think the current mandatory labelling requirement is an impediment to developing existing/new markets? What reasons do you have for this?

AUSVEG understands that the mandatory labelling requirement can act as a barrier for existing and new markets. The labelling requirement does not inform the consumer, and can instead be viewed as a statement of warning. Furthermore, the average consumer does not have a good understanding of radiation, nor that the methods approved for irradiation have been used successfully and safely for over 50 years across the world. It can act as a barrier to consumer acceptance, in addition to posing difficulties from a procedural point of view and resulting in increased costs. All of these are examples of how mandatory labelling functions as an impediment to market access.

18. What do you perceive to be the costs associated with the mandatory labelling requirement? (For example, costs of segregating irradiated produce from non-irradiated produce, specific packaging and/or labelling costs, traceability costs.)

AUSVEG recognises that the primary costs associated with mandatory labelling come in the form of time for additional procedures required, money for implementation of labelling on all produce/produce packages and cost of restricted market access and unjustified consumer fears.

This significantly impacts market access, and use of irradiation technology for the purposes of efficient and safe sterilisation of fruiting vegetable produce. AUSVEG understands that the current mandatory labelling requirement has an impact on the use of the technology and the application of irradiation when it would be the most effective method.

19. What do you perceive the costs associated with the removal of mandatory labelling to be? (For example, potential for loss of consumer confidence in your products, amending product segregation, handling and display processes).

AUSVEG considers that the perceived costs associated with removal of mandatory labelling would be that consumers would not know what food has, and has not, been irradiated. However, AUSVEG believes that this will only have an impact on consumers who have a bias against irradiated produce, however the market will work to supply this niche accordingly.

There will be some costs associated with removal of mandatory labelling when it relates to packaged produce. However, much of the fruiting vegetables that would and do make use of irradiation as a sterilisation technique require additional stickers and notices, this would be removed and thus there will be a saving overall with the removal of mandatory labelling.

20. What are the opportunity costs for your business associated with the mandatory labelling requirement? (That is, does the requirement to label irradiated produce cause you to compromise in your business practices? For example, does the time delay involved in labelling your produce prevent you from accessing certain market opportunities?)

AUSVEG will suffer no opportunity costs regarding irradiation labelling.

21. What are the relative costs and benefits of irradiation and other treatments in terms of cost, efficacy, post-treatment produce quality, convenience and timeliness?

AUSVEG recognises that there are several methods available to growers for treatment of produce, the primary effective methods being heat treatment, cold treatment, Methyl Bromide and irradiation. With Methyl Bromide being significantly cut back and regulated, costs are increasing for use of the chemical in sterilisation, however it is still effective and does not require any form of mandatory labelling. Heat and cold treatments can have negative effects on the produce, however are effective and do not require mandatory labelling. Irradiation is safe and efficacious and low cost, utilising gamma radiation to destroy bacteria and pests in a timely manner while still maintaining the cold chain in transport. However, there is the additional cost and lack of consumer acceptance associated with mandatory labelling.

22. What are your views about information on the safety and benefits of food irradiation being on food labels?

AUSVEG believes that if mandatory irradiation labelling continues then inclusion of a short description on the safety and benefits would better outline the effects of irradiation of produce than the current labelling that can be read out of context.

23. What other practical approaches other than labelling can be used to communicate the safety and benefits of food irradiation? (Please describe).

AUSVEG understands that the general consumer has a fear of irradiation due to a limit of understanding, it may be possible to include additional information relating to the positive benefits of irradiation. However, the general consumer may still see the word irradiation, and associate it with negative effects rather than read the full description.

24. Do you have any information on the effectiveness of any of these approaches? (If so, please provide).

AUSVEG does not have any examples on the effectiveness of these approaches.

5. Recommendations

AUSVEG understands that irradiation is a very efficacious and safe sterilisation technique available to producers. Also the technology has been used safely for over 50 years across the world, and that research has consistently shown that irradiated food is safe to eat.

Irradiation has been studied extensively by leading food safety bodies, including FSANZ, and within Australia foods treated using ionising radiation have been in the food supply for at least 30 years with no evidence of any negative effects.

There has been no scientifically sound evidence published demonstrating that irradiated food will have, or does have, any potential future harm for humans.

AUSVEG recommends that FSANZ consider that there is no positive outcome or effect from mandatory labelling of irradiated food, and that it should be removed.