

Response to

Labelling Review Recommendation 34 – review of mandatory labelling of irradiated food

Food Standards Australia New Zealand

Prepared by Dairy Australia
on behalf of the Australian Dairy Industry

Contact

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The Australian Dairy Industry

Dairy Australia welcomes the chance to present this submission in response to the review of irradiation labelling being undertaken by Food Standards Australia New Zealand (FSANZ).

Dairy Australia is the dairy industry-owned service company, limited by guarantee, whose members are farmers and industry bodies, including the Australian Dairy Farmers, and the Australian Dairy Products Federation

Australian dairy is a \$13 billion farm, manufacturing and export industry.

Over 6000 dairy farmers produce around 9.7 billion litres of milk a year.

The Australian dairy industry directly employs nearly 40,000 Australians on farms and in factories, while more than 100,000 Australians are indirectly employed in related service industries.

Our industry has the potential to grow substantially over the next decade to meet growing domestic and international demand.

Realising this growth potential and expanding the industry's economic, social and environment benefits depends on a positive national and international operating environment—including a legislative framework that is fit-for-purpose.

Remove requirement for mandatory labelling of irradiated food

Dairy Australia welcomes the opportunity to respond to the FSANZ review of mandated labelling of irradiated food—as recommended in the 2011 review *Labelling Logic* (recommendation 34). The dairy industry key position on food labelling, stated during that comprehensive review, remains relevant here:

- The dairy industry **supports a mandatory labelling system for** food that allows for effective communication of **food safety and food identification facts** to consumers, supports fair competition and fair trade for industry and brand owners, has a high level of compliance and is consistently enforced.
- The dairy industry **supports a voluntary labelling system for** food that permits other claims including but not limited to functional ingredients, nutrition, health promotion, and credence claims (e.g. environmental signposting, agricultural and animal husbandry systems that may be used in processing and in some instances processing technologies). Such systems should permit effective communication to consumers, support fair trade for industry and brand owners, have a high level of compliance and be able to be enforced.
- The dairy industry **does not support mandatory health promotion messages to consumers by way of food labels.**

Labelling should not impede innovation. The dairy industry supports mandatory arrangements for food labelling **only** where it is evidence-based and proportionate to risk.

Specific comments on the issues paper:

Because foods produced or processed using new technologies, such as irradiation, are subject to pre-market safety assessments, labelling is not a public health and safety issue.

While **Dairy Australia is not aware of any irradiated dairy products**, the World Health Organisation has undertaken a number of assessments on the nutritional and microbiological safety aspects of food that has been irradiated and found it to be safe.

Furthermore, where the labelling of new technologies and innovative processes impedes competition and fair trade AND where it gives the impression of health and safety risk contrary to the findings of scientific risk assessment, **voluntary labelling is more appropriate** than a mandatory requirement. Mandatory

labelling of irradiation unfairly singles it out among a myriad of food treatments such as pasteurisation or chemical disinfestation.

For these reasons, **Dairy Australia supports removing arrangements for mandatory labelling of irradiated food.**

Should labelling of irradiated foods continue to be mandated, undue cost implications could be avoided if:

- the wording of the statement is not prescribed—allowing the food industry to communicate the benefits of irradiation where desirable;
- the use of the Radura symbol is not prescribed; and
- arrangements apply only to whole foods and not to food containing irradiated ingredients or restaurant meals.

While Dairy Australia concurs that consumer acceptance improves when information is provided, **labelling fresh or packaged food is not the best tool for increasing consumer knowledge and understanding or achieving broader public health objectives.** Other approaches to educate consumers about the benefits and safety of irradiation should be explored if its use becomes more prevalent in Australia's food supply.

Developments in information technology provide alternative and supplementary ways whereby relevant and valuable functional, health promotion information and credence claims required by consumers can be provided in a more rapid, interactive and individualised manner than traditional food labels. The dairy industry supports the use of these technologies (e.g. smart trolleys, smart barcodes etc.) as tools that complement other more traditional ways (e.g. publicly funded programs, school education etc.) of disseminating valid information to consumers.