

submissions

From: standards.management@foodstandards.gov.au
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Subject: FSANZ: Applications and Submissions - Submission [SEC=INCONFIDENCE]
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FSANZ: Applications and Submissions - Submission

Tuesday, 9 February, 2016

1. Assessment Report Number: Consultation Paper – Labelling Review

Recommendation 34: Review of mandatory labelling of irradiated food

2. Assessment Report Title: Consultation Paper – Labelling Review Recommendation

34: Review of mandatory labelling of irradiated food

3. Organisation Name:

4. Organisation Type: Individual

5. Representing:

6. Street Address: [REDACTED]

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12. Submission Text: Consultation Paper – Labelling Review Recommendation 34:

Review of mandatory labelling of irradiated food The consultation paper is unlikely to get a meaningful response, because it fails to address a number of fundamental issues. 1. Are irradiated foods being labelled, and what is the current level of compliance with the labelling requirements? 2. What degree of surveillance on labelling has been carried out by the States, or at the point of importation, or by surveys conducted by FSANZ? 3. What level of surveillance has been conducted on compliance with maximum permitted levels of irradiation? 4. What level of surveillance has been conducted on non-permitted food irradiation? 5. Have there been any prosecutions or other legal actions taken for non-compliance? 6. Is it actually possible to determine by analysis if a food has been irradiated? 7. What products or ingredients can be legally irradiated in overseas jurisdictions, but not in Australia, and are likely to be imported into Australia? 8. Does AQIS advise State and Territory jurisdictions when batches of irradiated food are imported? 9. Foods or food ingredients which have been illegally irradiated, either in Australia or elsewhere, obviously would not be labelled as irradiated. 10. What products are legally irradiated under TGA permissions and could then be subsequently diverted for use as food ingredients? Like starches? 11. Asking the food industry if they use irradiated ingredients is not likely to solicit an honest response if they are not aware that the ingredient is irradiated.

12. Asking the food industry if they use irradiated ingredients is not likely to solicit an honest response, or any response at all, if they are not labelling accordingly. The irradiation labelling issue was neatly summarised by a visiting South African academic brought out to Australia in the 1970s (AIFST/CSIRO?) who outlined his research on consumer reaction to the irradiation of locally grown soft fruit. When labelled as “irradiated” there was substantial consumer resistance. After changing the labelling to “radurised” consumer resistance evaporated until consumers worked out “radurised” meant the same as “irradiated” and then consumer resistance was restored. The same occurred when they tried the radula symbol, or whatever symbol was in vogue at the time. He then hit on the radical idea of not labelling the irradiated fruit at all, and found there was no consumer resistance... He seemed quite offended when people laughed. So perhaps FSANZ will find there is no appreciable consumer resistance to irradiated food for the simple reason that irradiated foods, or foods containing irradiated ingredients, are not being labelled as such. Perhaps the question to consumers should have been more specific, viz would you buy or consume food labelled as “irradiated”? One might surmise that the answer would be a resounding “no”, especially if given a choice between irradiated and non-irradiated. And one might surmise that the food industry know this, which is why they either don’t knowingly use irradiated food or ingredients, or simply don’t label them as such. And maybe the reason for this resistance is that there has been little or no effort made to familiarise consumers with the process of irradiation, or its benefits, or its safety. And consumers have not been introduced to the concept of irradiated food because it’s not being labelled. Consumer acceptance is likely to be linked to their confidence in the level of surveillance by the relevant jurisdictions. If consumers were not satisfied that products were being effectively monitored for compliance, not just with labelling but also for non-permitted irradiation or excessive radiation, resistance would seem likely to remain.

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

The consultation paper is unlikely to get a meaningful response, because it fails to address a number of fundamental issues.

1. Are irradiated foods being labelled, and what is the current level of compliance with the labelling requirements?
2. What degree of surveillance on labelling has been carried out by the States, or at the point of importation, or by surveys conducted by FSANZ?
3. What level of surveillance has been conducted on compliance with maximum permitted levels of irradiation?
4. What level of surveillance has been conducted on non-permitted food irradiation?
5. Have there been any prosecutions or other legal actions taken for non-compliance?
6. Is it actually possible to determine by analysis if a food has been irradiated?
7. What products or ingredients can be legally irradiated in overseas jurisdictions, but not in Australia, and are likely to be imported into Australia?
8. Does AQIS advise State and Territory jurisdictions when batches of irradiated food are imported?
9. Foods or food ingredients which have been illegally irradiated, either in Australia or elsewhere, obviously would not be labelled as irradiated.
10. What products are legally irradiated under TGA permissions and could then be subsequently diverted for use as food ingredients? Like starches?
11. Asking the food industry if they use irradiated ingredients is not likely to solicit an honest response if they are not aware that the ingredient is irradiated.
12. Asking the food industry if they use irradiated ingredients is not likely to solicit an honest response, or any response at all, if they are not labelling accordingly.

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So perhaps FSANZ will find there is no appreciable consumer resistance to irradiated food for the simple reason that irradiated foods, or foods containing irradiated ingredients, are not being labelled as such. Perhaps the question to consumers should have been more specific, viz would you buy or consume food labelled as “irradiated”? One might surmise that the answer would be a resounding “no”, especially if given a choice between irradiated and non-irradiated. And one might surmise that the food industry know this, which is why they either don’t knowingly use irradiated food or ingredients, or simply don’t label them as such.

And maybe the reason for this resistance is that there has been little or no effort made to familiarise consumers with the process of irradiation, or its benefits, or its safety. And consumers have not been introduced to the concept of irradiated food because it's not being labelled.

Consumer acceptance is likely to be linked to their confidence in the level of surveillance by the relevant jurisdictions. If consumers were not satisfied that products were being effectively monitored for compliance, not just with labelling but also for non-permitted irradiation or excessive radiation, resistance would seem likely to remain.