

submissions

From: Dieter Ehlermann [REDACTED]
Sent: Friday, 25 March 2016 9:04 AM
To: submissions
Subject: Submission to Consultation paper 2016-01-18 mandatory labelling of irradiated food
Attachments: surebeam2.JPG

my submission to

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

Sir or madam,

the present regulation of labelling irradiated food in Australia/NewZealand appears to be guided by reason; except the provision that irradiated ingredients must be labelled until indefinite dilution.

This provision is also contained in Codex Alimentarius, 2003; however, this does not prove that it is reasonable.

Furthermore, in order to enforce that particular regulation, any food not labelled for containing irradiated ingredients must be destroyed completely in the analytical process by the food control authorities in order to trace the possible last molecule carrying the information of being irradiated.

My contribution is guided by the wish to maintain the rational approach and to develop it further where reasonable and appropriate.

I am an expert in food irradiation and have been involved also internationally in the topics to be considered here.

Key questions set in your consultation:

- the need for the mandatory labelling requirement for all irradiated food to continue,
- and assess whether there is a more effective approach to communicate the safety and benefits of irradiation to consumers.

Fundamental remark: food irradiation is not at all a '*new technology*' it is known since more than 100 years and commercially exploited since decades.

In your references, it must be fundamentally corrected, it was not WHO who evaluated the safety of irradiated food; however, WHO convened two panels:

Joint FAO/IAEA/WHO Expert Committee on Food Irradiation (JECFI, 1994) paralleling JECFA
Joint FAO/IAEA/WHO Study Group on High-Dose Irradiation (JSGHDI, 1999)

It is true, those reports were finally published by WHO, also WHO adopted the conclusions as its own opinion.

It is quite disappointing that the most basic publication about the 'safety' of irradiated food is not at all referenced:

J.F. Diehl, Safety of irradiated foods, Marcel Dekker, 1999, 2nd. edition

This is the compendium still standing today; there are several complements published, as considered by JECFI and FSGHDI. Furthermore, the terminology has been expanded from 'safety' to wholesomeness. This terminology now covers safety in the meaning of innocuity, but also the benefits to wealth and well-being.

SCF, 1986 has been superseded by an EFSA position in 2011.

References as Arvanitoyannis IS (2010) Irradiation of food commodities: techniques, Applications, Detection, Legislation, Safety and Consumer Opinion. First edition 2010 Elsevier Inc are just of no value; one more of those many trash-publications.

As it regards labelling of irradiated ingredients, any regulation must not discriminate irradiated ingredients. If regulations generally provide a set lower limit of content, below which the ingredient needs not to be labelled, there is no reason, to exempt irradiated ingredients from such provision.

It is false to state (p.10 with reference to Codex 2003) that the Radura logo is required.

As FSANZ is interested in consumer awareness of irradiated food, the results need to be compared to awareness of other technologies: microwave, electric (conductive) heating, ultrashort electrical pulses, hypersonic treatment, ultrahigh pressure. And also consumer awareness should be related to the obvious general acceptance of pharmaceuticals produced by genetically modified microorganisms (diabetes!); contrasted for example to the objection to flavourings produced by genetically modified microorganisms.

Such very fundamental studies could render insight into the justification of mandatory labelling in certain situations.

It must also be considered what are really effective approaches to labelling. The hot-debated actual example: the traffic light system for 'healthy' or 'unhealthy' food to guide the consumer to a more responsible approach to nutrition.

Of course, a believer has the right to request that his food is free of, for example, pork. Another believer has the right to be ensured that the butcher has done the obligatory prayer before killing the animal. However, how can or must this be expressed on an obligatory label?

Questions for Submitters 1.

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

>> The literature is abundant! Use the several literature search services. Nothing new, standing findings are frequently just re-confirmed.

Comment to stakeholder aspects: Telling the truth is always 'promoting' the truth; despite the allegations by advocacy groups.

The question about 'positive' labelling is a quite different one:

The US had a labelling for prepared, raw hamburgers, irradiated against the health risk from EHEC and others:

irradiated for (your) safety - serve with confidence (see attachment)

Is this a too positive statement, not tolerable under the law?

'Truly informed choice' does not at all depend on the kind of labelling. 'Informed' implies, that information is available already before and understood by the consumer. On this level, referring to the knowledge acquired by the consumer, the label may contribute to an informed decision.

Questions for Submitters 2.

Do you purchase, or would you consider purchasing, irradiated food?

>> Yes, of course and without reservation. I am an expert in food irradiation and I can judge the advantages: For example, deep-frozen irradiated frog legs reduced in the load of hazardous microorganisms; appropriate heating would destroy flavour and texture.

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?

>> The required labelling - in Australia/New Zealand - is ridiculous; in order to make informed choice, also of other treatments or processing techniques - it is indispensable to collect more information which can never be given through some labelling. For example the MSC-labelling for fish.

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

>> As long as the language is non-mistakable, but revealing the facts, there is no need or justification to require one single, prescribed, specific wording.

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

>> The Radura symbol may be used as a positive sign of information; industry might if even use it advertising the improved quality of their products.

Questions for all submitters

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?

>> There is no need or justification to label any food treated by irradiation. For example, milk is homogenized without labelling the method used. Some food is heated without being labelled for this treatment. And many kind of sausage can only be produced by heating, without labelling it. Irradiation must be labelled in a comparable and justified way.

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

>> The menu of restaurants still carries remarks on allergens and other ingredients essential for very specific groups of consumers. However and mostly, such information is only given on particular request by the customer and by guidance by the waiter.

8. If labelling was to continue for irradiated whole foods, do you think irradiated ingredients used in packaged food should still be labelled?

>> If labelling of ingredients is continued, there should be clear minimum prescriptions when a minor and insignificant ingredient was irradiated (cf. US regulations)

Questions for Submitters

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

>> This is just impossible to achieve; you cannot attach a booklet with a few essentials to the label. Consumer education needs to take other channels. Producers have to present their product for tasting and testing together with the relevant information, answering any questions. Several studies, in particular at US markets have proven this approach to be the only effective one. There is more to read, not only Bruhn, 1986.

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

>> Labelling of benefits is most critical in most regulations world-wide. There are many known ways of 'communication', but labelling is no such way.

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

>> There is abundant published data.

I wish you great success; hopefully setting the pace for a new and responsible approach to labelling in general and in particular for irradiated food.

Yours sincerely Dieter EHLERMANN



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