



29 March 2016

Submission on labelling review recommendation 34 – irradiation labelling

Introduction

The Soil & Health Association of New Zealand Inc. (**Soil & Health**) was incorporated under the Incorporated Societies Act 1908 on 4 December 1942. Soil & Health's objectives broadly include soil health and the promotion of organic gardening and farming. It has approximately 3000 members, chiefly composed of organic gardeners and consumers, farmers and growers, secondary producers, retailers and restaurateurs. Its age and membership make it both the oldest and largest representative organic organisation in New Zealand.

Soil & Health welcomes the opportunity to comment on irradiated food labelling. Soil & Health **supports** the labelling of irradiated food so that consumers are informed and can decide between fresh and irradiated food when shopping or dining out. For clarity, the words "irradiated" , "treated with irradiation" or "treated with ionising radiation" should be required on the label. Our comments and answers to FSANZ's questions follow below:

Detailed submissions

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?

As a publisher of an organic food and agriculture magazine (*Organic NZ*) we are responsible for providing information to consumers on issues related to food and agriculture. In our most recent issue there was a full article on food irradiation and its effects on health, thereby informing our readers and therefore consumers on irradiated foods and their labeling. The article is available to be viewed online here: <http://organicnz.org.nz/node/1120>

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

No, we as an organization do not support the purchasing of irradiated food. This is due to the well-known effects of food irradiation on human health. There have been numerous scientific studies on the harmful effects of food irradiation. Irradiation causes vitamin and amino acid depletion in food. It changes the molecular structure of food, potentially forming toxic chemicals linked to: cancer, organ damage, genetic mutations, immune system disorders, tumours, stunted growth, reproductive problems and nutritional deficiencies.¹

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 current labelling does not provide the right information to make an informed choice. The current labelling is confusing for consumers. In order for consumers to be able to make an informed choice the labelling needs to be clear, simple and not confusing. We believe that the words "irradiated" or "treated with irradiation" or "treated with ionising radiation" should be used on labels.

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

Soil & Health believes that the statement should continue to be prescribed. Consumers have a right to know whether the food they are purchasing has been irradiated. Without the label consumers are likely to be misled and deceived.

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

Soil & Health believes that symbols in general can be confusing for consumers, as there are many different symbols used on food products these days. Symbols are also often used to show that a product has health benefits, for example the Heart Foundation Tick and organic certification.

The Radura symbol does not conjure up ideas of irradiation. If anything, it looks like a friendly, healthy plant, and conveys a positive image. We therefore believe that the Radura symbol should not be used as it may mislead consumers into believe that the food or food product has health benefits. Instead, we think the internationally recognised symbol for irradiation hazard should be used – the black and yellow triangular symbol (on the Wikipedia page about ionising radiation: https://en.wikipedia.org/wiki/Ionizing_radiation). This symbol is much more likely to be recognised by consumers as being connected with irradiation.

6. Do you think the current labelling requirement for all foods permitted to be

¹ Public Citizen, Questioning Food Irradiation, April 2003, www.citizen.org/cmep

irradiated should be removed?

No – see answer to question 4 above.

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

Soil & Health believes that all irradiated foods, whether served inside a restaurant, or sold from a takeaway or retail outlet, should be labelled.

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

Yes, we believe that all irradiated food, whether in whole form (100% irradiated i.e. frozen mango), or as an ingredient used in packaged food (0.1% of product irradiated i.e. pie with spices), should be properly labelled as being irradiated.

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

Soil & Health believes that food labels are for providing information, not for product promotion. If such claims were made, in the interests of fairness and balance the risks, costs and hazards of consuming irradiated food must also be included.

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

Education is always good. However, any such promotional information must also include a factual, fair and balanced portrayal of the short and longer term risks, costs and hazards of consuming irradiated foods so those getting the message are not misled or deceived.

Conclusion

The Soil & Health Association strongly supports the labelling of food to show that it has been irradiated. We believe however that the current labelling is too general. Instead words 'irradiated' or 'treated with irradiation' or "treated with ionising radiation".should be used on labelling, as they are a lot clearer for consumers. This wording should be mandated. Doing so provides consumers with the choice of whether to buy irradiated foods or not. Without such labelling consumers are likely to be misled and/or deceived.

Yours sincerely



Position: Co Chair

The Soil & Health Association of NZ

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