



March 21, 2016

To: Food Standards Australia New Zealand

Re: Labelling review recommendation 34 - irradiation labelling

Views of the International Irradiation Association

The International Irradiation Association www.iiaglobal.com is a not-for-profit organization promoting the safe and beneficial use of irradiation. Membership of the Association is diverse in terms of size, specialization and geographic location and includes all leading providers of products and services in the irradiation business as well as a number of governmental research institutes.

On behalf of its members, the International Irradiation Association wishes to comment on recommendation 34 of the report *Labelling Logic: Review of Food Labelling Law and Policy* (2011) and in reaction to the Consultation Paper *Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food* (18 January 2016).

Over the past decades, a number of international and national organizations have stated or reiterated that properly controlled irradiation of food has various potential benefits without affecting the safety or nutrition adequacy of the food. However, regulators have generally deemed the mention of irradiation on labels necessary for the information of consumers, while this requirement does not exist for other physical food processes or chemical treatments such as fumigation.

Despite the promotional and educational efforts of organizations such as the World Health Organization (WHO) and the International Atomic Energy Agency (IAEA), the words 'irradiation' or 'irradiated', when used in the context of food processing, are widely misunderstood. As a result, the use of these terms which are often associated with hazards rather than safety is more misleading than informative.

The labelling requirement largely explains the slow adoption of irradiation as a food technology and ultimately deprives consumers of its benefits, such as preventing foodborne illnesses, extending shelf-life or replacing chemical treatments. Indeed, the anticipated perception of the word 'irradiation' by purchasers has made many food manufacturers, producers and retailers reticent to commercialize irradiated food products.

Since such a requirement does not exist for other physical food processes, singling out irradiation necessarily appears as a form of warning. This is particularly the case when the mention must appear on restaurant menus or concerns a very minor ingredient. In the European Union and in South Korea¹, since it has been made mandatory to mention any irradiated ingredient, no matter how small its

¹ Food Irradiation in Asia, the European Union and the United States: A Status Update



proportion in the final product, the quantities of food being irradiated have collapsed and, in the case of spices and herbs, producers have partly switched to thermal treatments that lead to products of inferior quality compared to irradiation.

The International Irradiation Association is of the opinion that:

- There should be no requirement to mention irradiation on food labels unless the same requirement exists for all chemical and other physical treatments;
- If irradiation must be mentioned, it must be only when a major portion of the food has been irradiated;
- If irradiation must be mentioned, it must be permitted to state the positive consequence(s) of the irradiation treatment.

Submitted [REDACTED] on behalf of the Board of Directors
of the International Irradiation Association to Food Standards Australia New Zealand
www.foodstandards.gov.au/code/changes/submission/pages/SubmissionForm.aspx