

29 March 2016

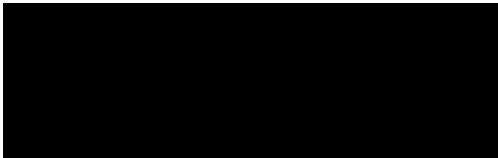
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Consultation Paper – Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**

**CONSULTATION PAPER – LABELLING REVIEW**

**RECOMMENDATION 34: REVIEW OF MANDATORY LABELLING OF IRRADIATED FOOD**

**29 March 2016**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Consultation Paper – Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food.***

### **New Zealand Food & Grocery Council**

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

### **Overarching Comments**

NZFGC supports the removing the mandated requirements for labelling irradiated food. It is a process that is highly regarded as an effective biosecurity and food safety measure world-wide, is safe, and for which no toxicological residual remains. It has been supported by the WHO since 1987 and there is an extensive body of scientific evidence supporting its safe and efficacious use on food.

### **Detailed Comments**

**Question 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?

**NZFGC response:** NZFGC does not hold any studies or data on consumer awareness, understanding and behaviour, in response to labelling about food irradiation. We understand that informal, anecdotal information may be available from retailers that have carried irradiated foods.

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

**NZFGC response:** NZFGC does not generally purchase food in its own right. However, we would have no reservations in purchasing irradiated food as part of catering for events.

**Question 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?

**NZFGC response:** Yes, although NZFGC does not consider there is a need to label irradiated foods as there is no toxic or other residual from the treatment.

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

**NZFGC response:** NZFGC supports the statement not being prescribed. It is a process that is now highly regarded as an effective biosecurity and food safety measure world-wide, is safe,

and for which no toxicological residual remains. This last feature is achieved by limiting the energy level of the radiation employed, and selecting the type of radiation.

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

**NZFGC response:** NZFGC would support voluntary use of the Radura symbol should producers or manufacturers wish to use it. Such a choice to use could be to secure preferential sales. It is instructional that in some countries, where irradiation's positive impact on the food safety feature is better understood (such as the Netherlands and South Africa), irradiated food is sought after and sold at a premium. In such circumstances, a voluntary arrangement can become a commercial decision for the manufacturer.

**Question 6.** Do you think the current labelling requirement for all foods permitted to be irradiated should be removed?

**NZFGC response:** NZFGC supports removal of the current labelling requirement on the basis that the process is safe, non-toxic, maintains full nutritive value of food and sensory quality, and has been supported by the WHO as a safe food treatment since 1987. For the WHO, the added benefits of conserving foods in the fresh state and providing for perishable foods to be kept longer without noticeable quality loss addresses topical food supply and food waste issues. Some consumer reactions to irradiation can be compared to the opposition against the pasteurisation of milk. A century ago, opponents kept pasteurisation from commercial use on milk for many decades. Uninformed fears about irradiation block rational consideration of its benefits.

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

**NZFGC response:** NZFGC does not support the labelling of irradiated foods by restaurants for the reasons set out in the responses to the above questions.

**Question 8.** If labelling was to continue for packaged foods containing irradiated ingredients, do you think the irradiated ingredients should still be labelled?

**NZFGC response:** NZFGC does not consider irradiated ingredients should still be labelled. However, an alternative approach would be to exclude irradiation labelling where the ingredient(s) comprised less than 20% of the final product.

### ***Produce growers***

**Question 9.** Does the mandatory labelling requirement prevent you from using irradiation as a treatment for your produce? Please provide reasons for your answer.

**NZFGC response:** NZFGC understands that but in terms of 'prevention' from using irradiation in New Zealand, access to appropriate facilities rates highly. Such facilities remain high cost for dealing with quantities of packaged food or for quantities of loose, whole foods.

### ***Food manufacturers***

**Question 10.** Do you use irradiated ingredients in your products? (For example, tomato paste, herbs & spices).

**NZFGC response:** NZFGC understands that very few, if any, ingredients are used in products manufactured in New Zealand. If they are used, they would be minute components of the foods.

**Question 11.** Does the fact that irradiated foods have to be labelled impact on your decision to use them?

**NZFGC response:** NZFGC understands the issue has not been seriously explored because the need for irradiated ingredients is very low or non-existent. However, this would be a consideration should the need for irradiated ingredients increase in the future.

**Question 12.** How important is the labelling factor alongside other factors? (For example, price, availability of ingredients, quality of produce, reputation of supplier).

**NZFGC response:** Labelling generally is a key factor in food manufacturing and irradiation labelling would therefore be of consideration against other factors.

**Question 13.** If the mandatory labelling requirement was removed for irradiated ingredients used in processed foods, would your company be more likely to use irradiated ingredients?

**NZFGC response:** NZFGC understands this would remove barriers to use.

#### **Food service providers**

**Question 14.** Do you use irradiated whole foods in your products? (For example, irradiated tomatoes in sandwiches).

**NZFGC response:** Not applicable.

**Question 15.** If the mandatory labelling requirement was removed for irradiated whole foods, would you still ask suppliers to label the food?

**NZFGC response:** Not applicable.

#### **All industry submitters**

**Question 16.** Have you conducted any consumer research or received consumer enquiries about irradiated food? If so, are you able to provide the research to FSANZ?

**NZFGC response:** NZFGC has not conducted consumer research about irradiated foods.

**Question 17.** Do you think the current mandatory labelling requirement is an impediment to developing existing / new markets? What reasons do you have for this?

**NZFGC response:** NZFGC is not aware of the current mandatory labelling requirement impeding the development of markets.

**Question 18.** What do you perceive to be the costs associated with the mandatory labelling requirement? (For example, costs of segregating irradiated produce from non-irradiated produce, specific packaging and/or labelling costs, traceability costs).

**NZFGC response:** Costs associated with the mandatory irradiation labelling are the same as for many other mandatory labelling requirements. More specific information would need to be provided by individual manufacturers although parallels with other label costing information should apply.

**Question 19.** What do you perceive the costs associated with the **removal** of mandatory labelling to be? (For example, potential for loss of consumer confidence in your products, amending product segregation, handling and display processes).

**NZFGC response:** Where premiums are afforded to irradiated products, then no loss would be effected if voluntary labelling was still available.

**Question 20.** What are the opportunity costs for your business associated with the mandatory labelling requirement? (That is, does the requirement to label irradiated produce cause you to compromise in your business practices? For example, does the time delay involved in labelling your produce prevent you from accessing certain market opportunities?).

**NZFGC response:** This information would need to be provided by individual manufacturers.

**Question 21.** What are the relative costs and benefits of irradiation and other treatments in terms of cost, efficacy, post-treatment product quality, convenience and timeliness?

**NZFGC response:** The efficacy of irradiation as a food safety treatment is supported by many years of scientific evidence. Its cost is a barrier to use because of the high facility cost but other factors are all positive.

**All submitters**

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

**NZFGC response:** NZFGC considers that there are a variety of other channels that could be utilised to convey messages about the safety and efficacy of food irradiation than labels.

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

**NZFGC response:** NZFGC suggests that FSANZ liaise with the regulators in countries where irradiation attracts a premium such as the Netherlands and South Africa in terms of determining approaches to communicate the safety and benefits of food irradiation. However, there are multiple electronic and print channels available.

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

**NZFGC response:** NZFGC does not have information on the effectiveness of approaches for communicating the safety of food irradiation.