



**Nestlé**

Nestlé Submission

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

29<sup>th</sup> March 2016

# Nestlé Submission

## Acknowledgment

Nestlé is pleased to be able to respond to the consultation paper on the review of mandatory labelling of irradiated food. This submission is on behalf of Nestlé Australia and Nestle New Zealand.

## Key comments

### *Submitter Questions*

**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?**

In the past three years Nestlé has not received any contacts related to irradiation of food or specific food ingredients. We have had a very small number of queries since the call for submissions was made and subsequent media coverage.

**2. Do you purchase, or would you consider purchasing, irradiated food? - if yes, then why? - if no, then why not?**

N/A

**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?**

N/A

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

N/A

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

N/A

**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?**

If consumers accept that food irradiation is a robust food safety process that does not threaten their health, then removal of the mandatory labelling provision can be supported.

Irradiation is a treatment/process to ensure safe food. The food itself remains intact with the natural characteristics of flavour and colour maintained. The quality of the product or ingredient presented to the consumer is potentially enhanced. Current labelling requirements prevent the safe use of this technology by food manufacturers.

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

N/A

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

N/A

#### **Produce growers**

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

#### **Food manufacturers**

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

Nestlé does not use irradiated ingredients in any products sold in Australia and New Zealand.

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

Nestlé does not use irradiated ingredients in products sold in Australia and New Zealand because of the requirement to label for irradiated foods. Nestlé is strongly guided by consumer preferences, and the term 'irradiated' creates the impression for some consumers that the food is unsafe to consume.

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

The labelling factor is the main reason irradiated ingredients are not used.

**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?**

**Labelling requirement: If the food, ingredient or component of a food has been irradiated, a statement to the effect that the food, ingredient or component has been treated with ionising radiation is required.**

It would depend on the consumer reaction to this removal of requirements.

If consumers accepted that the removal of mandatory labelling did not mean a weakness in the food safety system, and if it was understood and accepted that irradiated foods undergo a thorough safety assessment, as is the case for other pre-approved ingredients such as novel foods, additives and so forth, this may change our decision not to use irradiated ingredients, provided these irradiated ingredients provided a safe, alternative to current methods of achieving food safety.

Irradiated food ingredients often mean that the natural flavour and colour of the food is retained which then means potentially a more optimal outcome for the consumer.

#### **Food service providers**

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

N/A

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

N/A

#### **All industry submitters**

**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?**

In the past three years, Nestlé has received no consumer queries relating to irradiation of food or ingredients.

We have received 544 consumer enquiries (out of a total of 239 119) in relation to similar topics. By far the majority relate to Genetically Modified ingredient use, with the remaining queries related to substances such as BPA and acrylamide.

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

The current mandatory labelling requirement is an impediment to innovation and renovation in the current market, as consumer reactions to such labelling makes manufacturers reluctant to use irradiated ingredients. This is in spite of a strong body of evidence that demonstrates that irradiation gives more options to process an ingredient to make it safe. Consumer acceptance of irradiation may allow use of some ingredients we do not consider currently.

The ability to import products from markets where irradiation labelling is not currently required would mean that we could import products more easily, using combined labels which would mean Australian and New Zealand consumers would have access to a wider range of products. If the Australian and New Zealand industry has invested heavily in alternative preservation methods to irradiation, but the overseas market, due to greater demand for irradiated products uses irradiation it could be making this market less competitive.

**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).**

Nestlé does not use ingredients which would require irradiation labelling. The costs associated with logistical issues such as segregating product, labelling or traceability costs have not been defined.

Manufacturers using irradiated ingredients in products imported from a market not required to label would need to over-label to include the mandatory irradiation labelling.

**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).**

This is not known, as impacts on consumer confidence are unknown.

**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?).**

There are considerable opportunity costs to Nestlé associated with mandatory labelling, as Nestlé has decided not to use irradiated ingredients because of this requirement. This reduces our options when selecting ingredients.

**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?**

Food irradiation is an important part of ensuring a safe food supply.

- There are many foods where safety cannot be guaranteed by other means without destroying the character of the ingredient, such as herbs and frozen fruits.
- There are other foods where irradiation will avoid or minimise the risk if cross contamination occurs at later stages in the food chain (e.g. raw chicken).

Controls need to be in place to ensure irradiation is not used to compensate for poor practices – there is a risk that harmful substances associated with poor practice may remain in the food (e.g. endotoxins, mycotoxins)

The safety and quality of our products is our number one priority. Therefore, regardless of the need to label or not, we ensure our products are safe for consumption. The labelling is therefore only required to meet consumer requirements around perceived non-safety of irradiated foods.

It is unclear as to why the food irradiation process was ever singled out as requiring labelling. This does not appear to be a common practice applied to other pre-approved technologies.

#### **All submitters**

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

Nestlé globally supports the use of GM foods and irradiation of foods, and other new technologies in food production that have been demonstrated to be safe.

Nestlé considers that FSANZ needs to improve their communication on the robust nature of the safety assessment of new technologies.

Consumers lack confidence in the assessment process itself, and labelling tends to heighten consumer fears about technology. Inconsistent approaches to labelling have contributed to consumers being more concerned about GM ingredients (for example) than novel foods.

While this sensitivity exists, it is unlikely that Nestlé in Australia and New Zealand will use new technologies where labelling is required. This does not reflect on the safety of these processes, but rather the consumer's attitude.

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

Extended labelling options such as QR codes on packs which lead to product websites can provide more information for the consumer to access if they would like to.

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

While extended labelling has the potential to be effective in providing expanded information on important topics that consumers are looking for, more support, education and time are needed for these technologies to be used across all population groups.