

Comments from the Victorian Departments of Health & Human Services and Economic Development, Jobs, Transport & Resources

Due date of submission – 29 March 2016

The Victorian Departments of Health & Human Services and Economic Development, Jobs, Transport & Resources (the departments) welcome the opportunity to provide comments on the consultation paper for Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food.

The departments note that this consultation paper has been released to enable Food Standards Australia New Zealand (FSANZ) to gather initial information from stakeholders on the mandatory labelling requirement for irradiated foods. This information will be provided for the consideration of the Australia and New Zealand Ministerial Forum on Food Regulation.

The *Ministerial Policy Guideline for Labelling of foods produced or processed using new technologies* states FSANZ should initiate a review of a mandatory labelling requirement every ten years. Considering the first permission for food to be irradiated was included in the Australia New Zealand Food Standards Code (the Code) in 2001, the departments believe it is timely that a review of the requirement for mandatory labelling be undertaken.

The departments note that the intention of this consultation is not to examine the safety of irradiation but to focus on stakeholder understanding and issues associated with the mandatory labelling requirement. However, the departments acknowledge that FSANZ references numerous findings that show that food irradiation is safe and effective. The departments further note that irradiation should only be used at levels consistent with doses prescribed in the Code. Given the range of potential health and economic benefits, the use of irradiation should be encouraged where it provides a cost effective and suitable alternative to other treatments.

To inform the government response to recommendation 28 of *Labelling Logic*, the then Victorian Department of Primary Industries commissioned an independent study to analyse the impacts of mandatory labelling of new technologies using irradiation as an example. The study found that the number of irradiated products available for sale in Australia is negligible. As a consequence, there was insufficient data to assess the quantitative costs and benefits of mandatory labelling on irradiated products. However, the report provided some useful findings relevant to FSANZ's consultation:

- Where mandatory labelling of food produced using new technologies is required, industry will be reluctant to use such technology unless there is significant industry need or substantial benefit that can be effectively conveyed to consumers.
 - The use of new technologies in food is an area where consumer concerns about safety can be misaligned with the current weight of scientific evidence. In this circumstance, mandatory labelling itself is not sufficient to guide consumers towards making optimal choices. Mandatory labelling may add to the confusion about the safety and risks of new technologies.
 - Where research into a new technology is close to commercialisation, industry may make a judgement not to apply the technology to food based on previous community responses if mandatory labelling is required. Similarly, where research has already been commercialised for application in food, industry may avoid it in favour of other less optimal methods.
 - Rather than fulfilling the aim of increasing consumer choice, mandatory labelling without any additional provision of information about the technology (e.g. safety, application, benefits) can reduce the variety of products on the market or result in consumers making mis- and or uninformed choices.
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