

**Supporting document 3**

Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food

Summary of stakeholder views

FSANZ released a public consultation paper in January 2016 to investigate stakeholder understanding and views on food irradiation labelling and whether the current labelling should continue. Further, industry stakeholders were asked about their use of irradiated foods and ingredients, the impacts and costs of the current labelling requirement and costs associated with its removal.

In addition to the public consultation, FSANZ also undertook targeted consultation with a range of stakeholders to capture their views and to obtain a more thorough understanding of the issues of food irradiation labelling relevant to particular stakeholders.

This supporting document details the questions asked in the consultation paper, and provides a summary of the comments received in response from both the public and targeted consultations including the views received in two campaign submissions.

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## 1 Consultation paper questions

The questions asked of stakeholders in the public consultation paper are provided below. Similar questions were also asked of stakeholders in targeted consultation.

***All submitters***

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?
2. Do you purchase, or would you consider purchasing, irradiated food?
* if yes, then why?
* if no, then why not?
1. 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?

**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.

1. What are your views about the wording of the statement not being prescribed?
2. What are your views about the voluntary use of the Radura symbol?
3. 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?
1. If labelling was to continue for irradiated whole foods, do you think restaurant meals containing irradiated ingredients should still be labelled?
2. If labelling was to continue for irradiated whole foods, do you think irradiated ingredients used in packaged food should still be labelled?

***Produce growers***

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

***Food manufacturers***

1. Do you use irradiated ingredients in your products? (For example, tomato paste, herbs & spices).
2. Does the fact that irradiated foods have to be labelled impact on your decision to use them?
3. How important is the labelling factor alongside other factors? (For example, price, availability of ingredients, quality of produce, reputation of supplier).
4. If the mandatory labelling requirement was removed for irradiated ingredients used in processed foods, would your company be more likely to use irradiated ingredients?

***Food service providers***

1. Do you use irradiated whole foods in your products? (For example, irradiated tomatoes in sandwiches).
2. If the mandatory labelling requirement was removed for irradiated whole foods, would you still ask suppliers to label the food?

***All industry submitters***

1. Have you conducted any consumer research or received consumer enquiries about irradiated food? If so, are you able to provide the research to FSANZ?
2. Do you think the current mandatory labelling requirement is an impediment to developing existing / new markets? What reasons do you have for this?
3. 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).
4. 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).
5. 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?).
6. What are the relative costs and benefits of irradiation and other treatments in terms of cost, efficacy, post-treatment product quality, convenience and timeliness?

***All submitters***

1. What are your views about information on the safety and benefits of food irradiation being on food labels?
2. What other practical approaches other than labelling can be used to communicate the safety and benefits of food irradiation? (Please describe).
3. Do you have any information on the effectiveness of any of these approaches? (If so, please provide).

## 2 Summary of stakeholder views

A summary of the comments received from the targeted and public consultations carried out as part of the review of Recommendation 34 is provided below. The consultation paper and copies of each individual submission (in full detail) can be found on the [FSANZ website](http://www.foodstandards.gov.au/consumer/labelling/review/Pages/Labelling-review-recommendation-34irradiation-labelling.aspx). Additional comments received from targeted consultation are discussed where relevant in the review report.

All submissions (including submissions for which FSANZ was unsuccessful in verifying identities of senders) and late comments have been considered. Individual submissions have been categorised by stakeholder group in section 4.1 of the Review Report. FSANZ has assumed that campaign submitters are predominantly consumers, and has not further categorised campaign submissions by stakeholder group.

### 2.1 Consumer awareness, understanding and purchase behaviour

In the consultation paper, FSANZ sought information (e.g. studies, data or consumer feedback) about Australian and New Zealand consumers’ current level of awareness, understanding and behaviour in response to labelling about food irradiation.

FSANZ received some information on consumer polls and surveys and submitter comments. One submitter referred to a study on awareness of food irradiation as a treatment (a 2012 consumer survey commissioned by AUSVEG, the national peak industry body representing Australian vegetable and potato growers). FSANZ was however, unable to obtain this study and therefore has not included it for assessment.

#### 2.1.1 Consumer awareness and understanding

The majority of consumers said they were aware of food irradiation as a technology, but a few consumers were unaware that food was irradiated or did not realise that irradiated food was required to be labelled. While some consumers had never seen food irradiation labels, others had rarely seen them. A few consumers stated they would not know how to identify if a food was irradiated.

Many consumers believed they had a partial or full understanding of irradiated food labelling statements. Others stated that they always read food labels and understood them generally, but these consumers did not specifically refer to food irradiation labelling.

Several industry submitters believed that consumers may view the labelling statement as a warning.

Some consumers incorrectly identified garlic, bananas and imported dates as being irradiated. One consumer referred to irradiation as a decontamination treatment for seafood and poultry, although it was not clear if they believed this was the case in Australia and New Zealand.

Few consumers understood that food irradiation was used to control pests, kill pathogens and extend shelf life. Common misconceptions were that irradiation was used to cover up food defects or clean up foods that are past their use-by or best-before dates. It was questioned whether irradiation was needed when other safer, superior methods of preservation were available.

Irradiated food was viewed as either ‘dead’, ‘denatured’ or ‘degraded’. Some submitters considered that irradiation depletes the levels of nutrients such as vitamins and minerals, destroys enzymes and affects the quality of food, including its taste. Some consumers referred to irradiated food containing more chemicals including carcinogens. Other consumers referred to extra poisons or toxins created by the irradiation process.

A New Zealand-based produce grower referred to the formation of new chemicals (unique radiolytic products) as a result of free radicals combining with existing chemicals in the food. They believed we should not assume these new chemicals are safe because their long term effects on the diet have not been studied.

A common theme of consumer submissions was that the long term safety and health benefits from consuming irradiated food was unknown and there is no unequivocal evidence of its safety in relation to human health. Some of these submitters thought that consumption of irradiated food could lead to chronic health problems. Consumers believed they would ingest radiation if the food was treated with radiation. One consumer advocacy group stated that changes to the molecular structure of food and the potential formation of toxic chemicals resulting from irradiation were linked to cancer, organ damage, genetic mutations, immune system disorders, tumours, stunted growth, reproductive problems and nutritional deficiencies.

Several consumers referred to the adverse effects on cats of eating irradiated pet food and believed that irradiated food must therefore be harmful to humans. Other consumers believed that studies supporting the safety of food irradiation were flawed. In contrast, one industry submitter believed that the average consumer does not have a good understanding of the scientific basis for food irradiation, with respect to its effects, benefits or use.

#### 2.1.2 Purchase behaviour

A recent survey was provided as evidence that New Zealand consumers desired irradiation labelling and would not purchase irradiated food. A Curia Market Research telephone poll of 1000 New Zealand adults was commissioned by Tomatoes New Zealand and was undertaken in April 2015 (Curia Market Research 2015). Poll participants were asked if they would like the fruit and vegetables they buy that have been treated with irradiation to be clearly labelled as irradiated; 85% of participants responded that they would. Participants were also asked if they would like to know if a dish they ordered in a restaurant, café or takeaways includes irradiated food; 78% of participants responded that they would.

One industry submitter provided evidence that increasing volumes of Australian irradiated mangoes have been purchased by New Zealand consumers, in preference to cheaper, heat treated mangoes imported from other countries. A report on the market potential for Australian mangoes illustrated increasing volume data for the Australian product up to March 2007 and suggested there was evidence that the issue of irradiated mangoes had become a non-issue.

This submitter noted, however, that the same (New Zealand) market for Australian irradiated tomatoes differed. In the first season (2013), more than 400 pallets (tonnes) of irradiated tomatoes were imported into New Zealand. However, the volume dropped to 346 pallets in the second season (2014). This submitter referred to a campaign against imported irradiated tomatoes by Horticulture New Zealand and Tomatoes New Zealand, and major retailers agreeing to support local non-irradiated tomatoes, as the reasons for the decrease in irradiated tomato imports.

The same industry submitter also noted that independent grocers and retailers in New Zealand have continually offered Australian irradiated tomatoes for sale since 2013, which suggests that consumers are purchasing them.

One industry submitter reported that sales of produce had declined since permission to use irradiation as a treatment was given (and thus the mandatory labelling requirement was triggered). This submitter believed that the decline was not necessarily because consumers were unhappy about irradiation *per se*; rather it was due to the scare tactics by a few.

During targeted consultations with FSANZ’s consultative forum, the Consumer and Public Health Dialogue, members noted that there were few foods for sale which use irradiated technology and so it was difficult to identify consumer attitudes towards irradiated foods. Members agreed that mandatory labelling may be a potential barrier to consumers purchasing irradiated products.

#### 2.1.3 Do you, or would you purchase irradiated food

Most consumers specified they would not purchase irradiated food. Many commented that they checked the labelling of every food they buy, although it was sometimes not clear whether they were specifically looking for irradiation information or different information (e.g. country of origin labelling, or if the food was organic). Others stated that they bought locally produced food.

Some consumers said that they would not rule out buying irradiated food if it was labelled and they could make an informed choice. Others stated they would consider purchasing irradiated food if the process was properly regulated and researched and if they knew more about its effects on the food and the human body when consuming irradiated food.

Several consumers indicated they would purchase irradiated food if non-irradiated options were unavailable and/or the irradiated food was the ‘only option’ available, or they would purchase it in an ‘emergency’. In contrast, others said their decision to purchase would depend on the particular food product and how much they wanted it.

Only a couple of consumers, industry submitters and an academic had no concerns about irradiated food and would purchase it. Of these, the industry submitter said that irradiated food is safer than food treated with some of the alternative phytosanitary treatments, which are unlabelled. One government submitter stated they would buy irradiated food if there was a phytosanitary or other health and safety reason for it being irradiated.

### 2.2 Adequacy of current labelling requirements

#### 2.2.1 Informed choice

A consumer advocacy group noted that the current labelling requirements were inadequate because they ‘left the shopper guessing’ about whether or not the food was irradiated. In its view, the location of the label information was inadequate when placed near irradiated loose fresh produce (e.g. as a shelf label or sign) such as fruit. The submitter thought this practice was misleading because consumers would not commonly understand that a sign nearby is a label; rather a label would mean something that is affixed to a product or written on a package. The consumer advocacy group also questioned whether there a technological need for irradiation, given that alternative treatments can be used instead of irradiation.

Three submitters representing industry and a consumer suggested that requiring individual labelling of irradiated loose fresh produce would reduce consumer confusion over what is and what isn’t irradiated, and prevent lack of compliance with the labelling requirement by produce retailers. An industry submitter added that individual labelling would also assist those retailers that struggle with understanding the requirements.

Another consumer advocacy group believed the lack of a consistent format for labelling was potentially problematic for consumers. Legibility and a prominent location were important for consumers to be able to make informed decisions.

Absence of prescribed wording for the statement was another reason for viewing the current labelling requirements as inadequate; the consumer advocacy group submitter noted that the statement may not include the words ‘radiation’ or ‘irradiation’. This submitter noted that it was permissible to use the phrase ‘Treated with ionising electrons’, despite this example being removed from the Code by FSANZ. They also noted that the term ‘ionising electrons’ is unfamiliar to consumers, does not indicate to the general public the use of irradiation, and would be technically inaccurate if gamma radiation was the used as the irradiation source. In their view, the term ‘ionising electrons’ should be prohibited. Several consumers agreed the term ‘ionising radiation’ was unclear, not well understood, or deceptive.

The word ‘irradiation’ was also deemed synonymous with ‘radiation’, which promotes confusion. However, an industry submitter referred to one study (Gamble 2002) which concluded that, despite the word ‘irradiation’ being off-putting and alarming, it should be used instead of a symbol because people have the right to know what has been done to their food.

Several industry submitters commented that the current labelling requirement was inadequate because it describes the process only and does not state the efficacy and/or benefits of irradiation. One government submitter believed that providing information about the reason for using irradiation may enhance consumer perceptions that it is effective as a means of destroying pathogens in food, or as a phytosanitary treatment for fruit fly. Other industry submitters and an international academic submitter believed that the lack of labelling and information for alternative treatments or processing techniques (e.g. methyl bromide is used as a fumigation treatment and is an ozone depleting chemical) meant that consumers are not given adequate information to make a fully informed choice.

One industry submitter stated that since such a requirement does not exist for other physical food processes, singling out irradiation necessarily appears as a form of warning. This submitter noted that in the European Union and in South Korea, where it is mandatory to declare any irradiated ingredient irrespective of the amount (e.g. on a restaurant menu, or in a packaged product), producers have partly switched to thermal treatments to treat herbs and spices. Although thermal treatments lead to products of inferior quality, these products are preferred to irradiated herbs and spices where the irradiation status must be declared.

A government submitter thought that 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, the submitter viewed mandatory labelling itself to be insufficient in guiding consumers towards making optimal choices. Mandatory labelling was thought to add to the confusion about the safety and risks of new technologies.

Another industry submitter noted that despite the promotional and educational efforts of organisations 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. This submitter noted that the use of these terms which are often associated with hazards rather than safety is more misleading than informative. Further, the submitter stated that 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.

Two industry submitters agreed the current requirements were adequate to make an informed choice, but they also stated that there is no need to label.

One consumer submitter believed the current labelling requirements were adequate, given that consumers make choices based on information on labels or signs, or beliefs and cultures, or simply select based on other factors e.g. brand knowledge, price, and appearance.

#### 2.2.2 Wording of the statement

In the consultation paper, submitters were asked to provide their views about the wording of the required statement not being prescribed. The DoGooder campaign question on this issue noted that FSANZ now only requires a very general statement and asked whether requiring the words ‘Irradiated’ or ‘treated with irradiation’ would be clearer than statements referring to ‘ionising radiation’.

Most consumer submitters, consumer advocacy groups and some industry submitters believed the mandatory labelling requirement should be strengthened by prescribing the statement wording. These submitters believed the statements ‘irradiated’ or ‘treated with irradiation’ would be more honest, clearer, simpler, and less confusing than statements that referred to ionising radiation. Other consumer submitters supported the idea of a prescribed statement(s), but did not provide examples. One consumer believed that the statement ‘Irradiated food’ would be sufficient. Other labelling suggestions included prescribing the use of an as yet undefined logo, or the nuclear radiation symbol or biohazard symbol, or risk-based statements such as ‘Danger, irradiated product could cause cancer’.

The reasons given for these views varied widely and included:

* informing consumers that the food is not as provided by nature
* it would improve community education (noting that many people do not understand the risks associated with this practice)
* most countries require this labelling (e.g. ‘irradiated’, ‘treated with irradiation’ or ‘treated with radiation’) already
* simple labelling would benefit industry which complains about having too much information on labels.

Several consumer submitters also believed that clearer labelling would prevent consumers from being misled by the use of irrelevant words and long sentences. One submitter thought that mandated wording would ensure food processors and retailers would meet their obligation to disclose that a food or ingredient is highly processed and thus not fresh. Another consumer submitter supported mandating the statement wording to avoid confusion with company trademarks.

One industry submitter stated that if mandatory labelling is retained, then the terms ‘irradiated’ or ‘treated with radiation’ would be suitable. This submitter opposed the use of any terms that hid the fact that irradiation was used as a treatment. Other stakeholder comments were made about terms that should be avoided if the wording was prescribed. Terms such as ‘picowaved’, ‘electronic pasteurisation’, ‘cold pasteurisation’ and ‘radurised’ were viewed as misleading, not meaningful to consumers and in some cases scientifically inaccurate.

Three consumers expressed a desire to see the irradiation dose, the ‘levels of radiation exposure’ (e.g. roentgens) or the ‘range of radiation used’ because this information would be clearer. One consumer and a public health submitter suggested that the source of irradiation be listed, for example: Gamma rays as emitted by the radionuclides cobalt-60 (Co-60) or caesium-137 (Cs-137); Electrons (electron beams, E-beams) or X-rays.

A government submitter commented that requiring the reason for use (e.g. phytosanitary) would be appropriate for enforcement purposes, given that the current labelling requirement is aimed more at informed consumer choice.

Many consumers, consumer advocacy groups and a public health organisation called for a prominent statement location and large font size to be prescribed to assist consumers to make informed choices. Other suggestions included individual labelling of irradiated loose produce in addition to signs for bulk containers of irradiated produce.

A consumer advocacy group and a consumer submitter stated that positively worded statements about the irradiation process should be prohibited, unless the risks such as potential allergenicity or nutritional compromise are also disclosed. Positive statements such as ‘This product has been treated with ionising electrons to destroy harmful micro-organisms’ or ‘Irradiated to protect the New Zealand environment’ were not supported. In contrast, some industry submitters suggested that if mandatory labelling was to continue, such positive statements should be permitted.

Some consumers and industry submitters appeared to believe that the wording of the required statement was currently prescribed and were either supportive or ambivalent about it. Some of these submitters stated that they would prefer to retain the words ‘treated with ionising radiation’ rather than see labelling information removed.

Several industry submitters were comfortable with the lack of prescription of the statement. There were calls for guidance of appropriate wording that could be used. One industry submitter believed prescription was not needed because irradiation is a safe and effective biosecurity and food safety measure used worldwide. Another industry submitter noted that undue cost implications could be avoided if the wording is not prescribed, and food industry should be allowed to communicate the benefits of irradiation.

An industry submitter representing produce growers opposed prescription on the basis that other processes (such as chemical treatments) do not require any labelling. In their view, the requirement for a statement on irradiated food is similar to asking for a statement of chemical use on produce and was therefore irrelevant.

#### 2.2.3 Use of the Radura symbol

The majority of consumer advocacy groups and consumers opposed the voluntary use of the Radura symbol. These stakeholders provided the following reasons:

* when used in association with labelling statements and despite having little knowledge of the irradiation process, consumers may (wrongly) perceive it to mean confidence and safety in the irradiated food
* the symbol was unconnected to irradiation and is therefore meaningless
* it is unnecessary because there is a labelling statement mandated
* it was not commonly used with the statement and is therefore unfamiliar to consumers.
* the symbol was thought to depict a ‘friendly, healthy plant’ that conveys a positive message, which may persuade consumers to believe the irradiated food has health benefits
* it was misleading because of the connotation that the product carrying it or the process itself is ‘clean and green’ and the green colour implies the food is fresh, which some viewed was not the case with irradiated foods that have an extended shelf life
* it is a marketing tool.

Several stakeholders stated that there were variations in the Radura symbol itself (as shown in Figures 1 and 2) and other very similar logos, such as the New Zealand ‘bio grow’ organic certification logo or the United States Environmental Protection Agency logo, as depicted in Figures 3 and 4, respectively. A consumer advocacy group noted that the plethora of symbols and logos on food labels can lead to consumer confusion.

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| http://upload.wikimedia.org/wikipedia/en/thumb/0/0c/Radura_international.svg/150px-Radura_international.svg.png**Figure 1. International Radura Symbol** | **Figure 2. United States Federal Drug Administration Radura symbol** |
| **Figure 3. New Zealand ‘bio grow’ organic certification logo** | **Figure 4. United States Environmental Protection Agency logo** |

Another consumer advocacy group referred to a study as evidence that shoppers accept irradiated products labelled with the Radura symbol, despite having little knowledge of the irradiation process. Most shoppers reported that the symbol meant confidence and safety.

A submitter believed that the Radura symbol is a marketing tool and strongly of the view that its use should be prohibited on whole foods and food products in Australia and New Zealand.

Another consumer advocacy group believed that the international ionizing radiation hazard symbol should be used as consumers were more likely to recognise it as being connected with irradiation.



**Figure 5. International ionizing radiation hazard symbol**

Some consumers and a New Zealand grower agreed that the Radura statement was unnecessary and preferred the labelling statement.

In contrast, industry and academic submitters supported the voluntary use of the Radura symbol because it was seen to promote the positive impact of irradiation, or because it was a helpful signal to advertise the improved quality of products due to irradiation. Voluntary use was considered acceptable as part of a wider co-regulation, communication and/or branding strategy.

Some industry stakeholders considered it would be practical to use the symbol in place of a statement, if the requirement for irradiated foods to be labelled continued. One industry submitter and a government submitter believed that a consumer education campaign would be needed to unsure its meaning was understood. Several consumers believed that if it was used, it should have to be accompanied by a labelling statement in accordance with the current requirements.

### 2.3 Removal of the current labelling requirement

#### 2.3.1 Opposition to removal of the current labelling requirement

When asked whether they thought the current labelling requirement for all foods permitted to be irradiated should be removed, all campaign submitters and the majority of individual submitters were against the suggestion that the current labelling requirement should be removed. These submitters represented consumers, consumer advocacy groups, some industry representatives, a public health organisation and one government submitter.

In the absence of food irradiation information, consumers would be unable to determine whether irradiation treatment was used and therefore whether food was ‘fresh’ or ‘processed’. It would be unfair if irradiated food did not have to be labelled, when other preserving and sterilising methods for food are evident to the consumer (e.g. freezing, drying, canning, pickling, use of chemical preservatives). Pasteurisation, which one submitter stated could affect safety and nutrition, was highlighted as a process that is routinely disclosed on labels.

Consumers would have no way of knowing if the food was safe, or could cause serious health effects as a result of the irradiation process if consumed. The long term safety of irradiated foods is unknown so the loss of labelling would mean that consumers were not given the opportunity to avoid the ‘risks inherent in altered foods’. One public health organisation suggested that FSANZ has a legislated mandate to protect public health and safety, and implied that it would fail in its duty of care if mandatory labelling of irradiated food was removed. A consumer advocacy group believed that FSANZ should consider the lifelong health of the Australian and New Zealand populations and stated that FSANZ has a responsibility in relation to preventative health, as illustrated in the Food Labelling Hierarchy (see the [Food Labelling Review website](http://www.foodlabellingreview.gov.au/internet/foodlabelling/publishing.nsf/content/48C0548D80E715BCCA257825001E5DC0/%24File/Food%20Labelling%20Issues%20Hierarchy%20Diagram.pdf)).

Removal of food irradiation labelling would mean there was no basis for any form of informed choice. The right to know where food has come from, who produced it and by what processes, and the ingredients it contains, was one of the primary reasons underpinning the opposition; it was considered a basic human right. The lack of this information would also impair consumers’ ability to make decisions based on the perceived quality of the food.

Some submitters thought that non-disclosure of food irradiation information would indicate deception and a ‘cover up’. Others noted that the loss of labelling would affect transparency in the food supply, and this would adversely affect consumer trust in the food industry and the regulators. The view was expressed that the government was responsible for clear and transparent labelling and removing this information should not be an option. Also that given that all current permissions for irradiation in the Code have been considered and approved in the context of mandatory labelling, its removal could be perceived as a ‘breach of faith’ and reduce confidence in the Code, FSANZ and food regulation more generally.

It was also mentioned that retaining labelling would mean no additional costs, because the labelling requirement was already mandated. Existing costs were viewed as ‘not significant’, given that the requirement could be met by ‘a sign on the wall… or a small amendment to an attached sticker.’

New Zealand consumers would lose a source of information that is currently used as a proxy for country of origin labelling (country of origin labelling is not a mandatory requirement in New Zealand). The latter was considered important to those stakeholders who wished to support New Zealand food producers. New Zealand producers and exporters expressed concern that, in the absence of labelling, consumers would be put off buying all fresh produce and the market would be affected. New Zealand industry submitters were particularly concerned that New Zealand consumers would be unable to differentiate between Australian irradiated produced and New Zealand non-irradiated produce (e.g. tomatoes) without the labelling; this potentially impacts on the market for both varieties.

A consumer advocacy group believed that New Zealand produce exporters would be exposed to greater competition or market exclusion for foods that may be irradiated. Further, an increase of irradiated foods imported into the Australian and New Zealand markets from other countries could lead to a less than optimal realignment of markets (i.e. less irradiated produce exported as labelling requirements still apply in other countries).

Several Australian and New Zealand consumers stated that they would have to resort to purchasing organic food.

Several submitters noted that labelling was specified in the Codex General Standard for the Labelling of Pre-packaged Foods (1985) and many countries worldwide require irradiated foods to be labelled. Australia and New Zealand would be out of step with the rest of the world if food irradiation labelling requirements were removed.

One government submitter would oppose the removal of the labelling requirement on the basis that consumer comfort with irradiation is uncertain, given that the use of this technology has been relatively low.

#### 2.3.2 Support for removal of the current labelling requirement

The remaining 12 submitters (20% of individual submitters), who represented industry, several consumers, two government agencies and an academic, stated they would support the removal of food irradiation labelling. Some of these submitters said they would support its removal if consumers accept that irradiated food is safe to consume.

Some submitters believed there was no reason to label given the technology has been proven to be safe over a long period of time and there is a body of scientific evidence that underpins this. Irradiation was not viewed as a new technology because it has been used for over 50 years. In contrast, other industry submitters believed that because foods produced or processed using new technologies, such as irradiation, are subject to pre-market safety assessments, labelling is not a public health and safety issue. Consequently there is less or no justification for mandatory labelling.

Most submitters referred to the benefits to consumers from irradiated food. One submitter noted that uninformed fears block rational consideration of these benefits and cited the opposition against the pasteurisation of milk, where opponents prevented commercial pasteurisation of milk for many decades, as an example of this.

There was the view that the quality of foods or ingredients presented to the consumer would be potentially enhanced if more foods are treated with irradiation than by other inferior treatments. Irradiated food is non-toxic, and retains full nutritive value and sensory qualities such as flavour and texture. Increased use of irradiation may lead to lower exposure to chemical residues from alternative treatments. In the future, irradiation may be needed to reduce the risks of foodborne bacterial pathogens in certain foods.

One industry submitter referred to the World Health Organization view that 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. Another industry submitter believed that the benefits of irradiation cannot be summarised on a label and so the removal of the requirement would reduce confusion and bias towards the technology. Two industry submitters believed that only a small minority of consumers wish to avoid irradiated food and the majority of consumers and the food industry are currently being disadvantaged.

Two industry submitters referred to the Food Labelling Hierarchy and believed that food irradiation labelling should be captured under ‘consumer values issues’. The reason for this was that there are no associated food safety issues. One of these submitters noted that ‘consumer values issues’ in the phytosanitary area could range from food safety issues (e.g. human health), environmental issues (e.g. production methods), global warming (e.g. glasshouse production using fossil fuels) and food miles; none of which attract any form of mandatory labelling.

Removal of the mandatory requirement would reduce unnecessary costs for industry and enforcement agencies. Produce growers may be more amenable to irradiation as a treatment option if the barrier to consumer acceptance (the label) is removed. They would no longer need to ensure their customers’ (retailers) compliance with the regulation. Major retailers would not have to consider store signage, which is operationally difficult to implement and manage on a day-to-day basis. Produce such as tomatoes would not have to be bagged for labelling (which is sometimes done because individual labelling is too onerous), which would reduce costs in relation to design, printing, materials, time and labour). Consumers could then buy their desired quantities of produce. Food service businesses may consider using irradiated foods and ingredients as there would be no cost of labelling to consider.

The removal of labelling would bring irradiation into line with other treatments or processes (e.g. chemical disinfestation, pasteurisation) that are not required to be labelled, and consequently remove an unfair barrier to trade. One industry submitter noted that the barrier to the development of irradiation technology would be removed and market distortion avoided if food irradiation labelling was removed. It would enable Australian and New Zealand food industries to expand their use of irradiation for produce exports if required in the future.

Two industry submitters stated that the market for irradiated fresh produce in New Zealand had been demonstrated. As more products are incrementally approved across a number of exporting countries in the future, they anticipated greater opportunities would accrue over time. There would be greater product choice and competition in the market place.

One industry submitter suggested that the removal of labelling may lead to opportunities for New Zealand consumers to purchase different exotic fruits imported from Asia. Another industry submitter noted the advantages of supplying produce such as tomatoes during the New Zealand winter season (i.e. significant price difference between Australian irradiated tomatoes and New Zealand non-irradiated tomatoes, consumer surplus and an overall increase in sales of all tomatoes).

#### 2.3.3 Irradiation labelling of restaurant meals containing irradiated ingredients

With respect to individual submitters, most (16, or 61.5% of individual submitters) representing consumers, consumer advocacy groups and NZ-based industry stakeholders agreed that restaurant meals containing irradiated ingredients should be labelled. For those campaign submitters that answered this question, the majority (79, or 92% of campaign submitters) also strongly supported this labelling requirement.

Their support was primarily based on the consumers’ right to know how the food has been produced and/or treated in order to make an informed choice. One consumer expressed a desire to have labelling continue as set out in the Codex global standard. Other consumers stated that labelling was warranted irrespective of the quantity of the irradiated ingredient (e.g. 0.1% of irradiated spices in a pie) or food (e.g. 100% frozen irradiated mango).

Several New Zealand-based industry submitters referred to the Tomatoes New Zealand commissioned survey which they said had demonstrated that consumers wanted restaurant food to be labelled (Curia Market Research poll, referred to in section 1.1.2).

Of the individual submitters, 10 submitters (38.5% of individual submitters) representing industry, two government agencies, an academic and a consumer disagreed. A further seven campaign submitters (8%) also disagreed for various reasons. Some stakeholders believed there was no need for labelling because irradiated food or ingredients are not harmful. One industry submitter said that food cooked using a microwave has been irradiated and does not require labelling because it has been proven safe, so why should food and ingredients treated with irradiation for phytosanitary reasons be labelled.

An industry submitter viewed the requirement as discriminatory, noting that food service businesses offer a choice of many foods that are handled and processed under variable conditions unknown to the consumer. This submitter suggested that food service operators could voluntarily claim the food is non-irradiated, similar to the practice for genetically modified (GM) food, gluten free and organic food.

Several consumers and a New Zealand-based industry stakeholder believe the requirement is too difficult to implement, unmanageable and cannot be ‘policed’. Two industry submitters suggested that it would be costly, and cost implications of labelling restaurant ingredients would be avoided if the labelling requirement applied only to irradiated whole foods. One industry stakeholder said the hospitality industry is eager to seek better prices for produce, particularly during the winter months when locally grown supplies are low.

Some stakeholders held the view that consumers already know most food is adulterated in various ways. Removal of the labelling requirement for restaurant meals was thought to be a fair compromise.

An industry submitter pointed out that information about allergens and other specific ingredients for health and safety reasons were not always declared on menus, so why require irradiated food and ingredients when it is safe? Consumers in restaurants and catering establishments have a right to know if a food could affect their health.

This submitter also noted that the Codex standard does not specifically mention food irradiation labelling in restaurants and catering and said that most countries have regulations that are silent on this issue. An academic submitter and a consumer referred to how mandatory information about allergens and other substances could be declared verbally when requested and suggested a similar arrangement for food irradiation information.

Three submitters noted that the labelling requirement for irradiated food and ingredients was inconsistent with and more onerous than the requirements for GM food.

Two submitters representing a government agency and industry suggested that if food irradiation labelling continues for restaurant meals, some form of threshold could apply. For example, labelling would not apply to minor ingredients.

#### 2.3.4 Mandatory labelling of irradiated ingredients used in packaged food

Most individual submitters representing consumers, consumer advocacy groups and NZ-based industry, a government agency and a public health organisation (15, or 62.5% of all individual submitters) believed that irradiation labelling should continue to be required for irradiated ingredients in packaged foods. For those campaign submitters that answered this question, the majority (65, or 93% of campaign submitters) were in favour of retaining food irradiation information on packaged food labels. Reasons given for maintaining labelling on packaged foods were similar to those mentioned for restaurant meals. Consumers also believed that labelling was justified because packaged food was processed and labelling itself is a simple process.

The Curia Market Research telephone poll (mentioned above in section 1.1.2) also asked poll participants if they would like the fruit and vegetables they buy that have been treated with irradiation to be clearly labelled as irradiated; 85% of participants responded that they would.

One consumer suggested prescribing the statement ‘X% of contents has been irradiated’. Another suggested a general statement ‘may contain irradiated foods’, similar to voluntary precautionary labelling for food allergens. Labelling was also viewed as necessary to prevent manufacturers from buying cheaper ingredients and passing them off as something they are not, and because some consumers had food sensitivities.

Five individual submitters also suggested that a threshold or other approach for irradiated ingredients in packaged food could be considered. Four of these submitters suggested setting a labelling threshold based on either the amount of an irradiated ingredient or the total amount of irradiated ingredients present in a packaged food. They noted that a threshold approach would be consistent with the regulations of some other countries (e.g. Canada 10% and Malaysia 5%). Two submitters proposed thresholds of 10% and 20%, while the remaining two submitters did not refer to a specific proportion, stating only that labelling should be required when the ‘major portion’ was irradiated.

Exempting irradiated herbs and spices as ingredients from food irradiation labelling could be an alternative approach. One submitter said that suppliers of herbs and spices viewed labelling as a barrier to using irradiation to control microorganisms. Other treatments such as heat or steam were used instead of irradiation and could have a major effect on the quality of the spices.

Six individual submitters (25% of individual submitters) representing industry and one consumer agreed that irradiated ingredients used in packaged food did not need to be labelled. Three campaign submitters (4%) held also held this view. Their reasons were similar to those described for exempting restaurant meals containing irradiated ingredients from irradiation labelling. One industry submitter also noted that it would not be possible to prove that an unlabelled multi-ingredient food does not contain an irradiated ingredient used in trace amounts (e.g. spices, which could even be a mixture from irradiated and non-irradiated sources).

### 2.4 Approaches to communicate the safety and benefits of food irradiation

#### 2.4.1 Stakeholder views

Some industry submitters stated that they were comfortable with including information on the safety and benefits of food irradiation on food labels. However, several others (and an academic) considered that labelling is not an effective tool for providing adequate information and increasing consumer knowledge and understanding of food irradiation, and other approaches should be explored.

Some consumer advocacy groups considered that it is not FSANZ’s role or that of other regulators and governments to promote the technology or massage public perceptions to promote acceptance. These groups supported the existing labelling to remain and be strengthened. One considered that some existing FSANZ material promotes irradiation, which they believed to be inappropriate. They noted that information from the Therapeutic Goods Administration and Biosecurity Australia acknowledges the potential adverse impacts of irradiation for non-food products and believed that FSANZ should present the issues of food irradiation in a similar, neutral way, rather than looking for ways to communicate its safety and benefits.

One consumer supported the provision of information on the safety and benefits on food labels and a consumer advocacy group considered that consumer education on the safety and benefits is important. Some submitters (one industry, individual and consumer advocacy group) considered that if positive statements are made, the potential negative impacts and risks of irradiation must also be stated in the interests of fairness, balance and honesty.

Two consumer advocacy groups considered that communication about safety is irrelevant as irradiation is seemingly being used only for insect control not sterilisation. In their view, if a food were approved for pest disinfestation, to then market the food as ‘safe’ or beneficial to the consumer for having been treated to address harmful microorganisms, would be dishonest. Additionally, if a food is to be irradiated for ‘safety’ (i.e. sanitary reasons), the public needs to know of the process to be aware of the potential risks associated with the pathogen/contaminant that irradiation is meant to address.

#### 2.4.2 Labelling approaches

One industry submitter believed that a short description of the safety and benefits on the label would better outline the effects of irradiation than the current labelling which can be read out-of-context. However, another noted that consumers may still associate the word ‘irradiation’ with negative effects rather than read the full description.

Some industry submitters noted the current use of positive statements on labels (e.g. ‘Irradiated for the New Zealand environment’) as communicating benefit, and the mandatory use of the ‘Radura’ symbol in some countries. In contrast, some industry submitters and an academic considered that labelling is not an effective tool for providing adequate information and increasing consumer knowledge and understanding of food irradiation, and other approaches should be explored.

#### 2.4.3 Other approaches

A number of suggestions were made, primarily by industry submitters, on approaches other than food labelling to communicate the safety and benefits of irradiation to consumers. One industry submitter suggested that FSANZ liaise with regulators in countries where irradiation attracts a premium (e.g. Netherlands, South Africa) about their communication approaches. Another suggested that the safety and benefits could be displayed on a larger sign in store, but noted detriments to this e.g. customers don’t look at large signs or shelf labels much. Suggestions were made for using information technology (e.g. websites, QR codes, smart trolleys, etc.) to provide additional information to consumers.

One industry submitter recommended that FSANZ improve its communication on the robust nature of its safety assessment, as consumers lack confidence in this process and labelling tends to heighten consumer fears about the technology. Some industry submitters considered that, even if alternative communication methods are used, mandatory labelling should be retained to differentiate irradiated and non-irradiated products and to maintain consumer trust. One consumer advocacy group suggested that all supermarkets and retail outlets that sell irradiated food should be required to have clear posters detailing the use, benefits and risks of this technology. An academic submitter suggested that producers should present their product for tasting and testing together with relevant information and answer any questions. They stated that there are several studies, in particular at US markets, which indicate this approach to be the only effective one. One consumer submitter suggested that the safety and benefits should be publicised on company and government websites and in in-store promotions such as cooking demonstrations. One jurisdiction suggested that any information provided should be in the context of the reason for use of irradiation (i.e. for phytosanitary reasons).

Some industry submitters suggested that consumers should be informed of the alternative treatments to irradiation to assist with informed choice. One of these noted that the food trade may find this comparison uncomfortable. One industry submitter suggested that consumers could be directed to the various Import Health Standards (New Zealand biosecurity standards for phytosanitary treatments) to highlight the benefits of irradiation over other treatments. They also were of the view that, as the number of irradiated products increase in the market, consumer familiarity with irradiation will increase and it will become the norm.

Several industry submitters provided comments on conveying the safety and benefits of irradiation through educational material and consumer publications. Two industry submitters recommended that a commonwealth education campaign should occur if the labelling requirement was removed from the Code. Two industry submitters raised questions of who would be responsible for and cover the costs of education campaigns. One of these submitters noted that a government agency may not have sufficient consumer trust and does not generally promote a specific technology, and the food industry would be seen by consumers as having too much self-interest. Two industry submitters suggested that FSANZ should introduce and lead an educational program. However, one of these noted that consumers may question why this is necessary if the food is safe and that a public campaign about the benefits would generate counter-criticism from opponents of irradiation which may cause consumer confusion the consumer.

One of these industry submitters also suggested that state health departments and other government departments (e.g. Australian Department of Agriculture and Water Resources and New Zealand Ministry for Primary Industries (MPI)) should assist with their own educational programs and that providing information to consumers is the responsibility of both governments and industry.

Some industry submitters advised that they have previously developed educational material (e.g. when irradiated tomatoes and mangoes entered the food supply). Some submitters noted that there are, or are likely to be, difficulties in education material effectively reaching consumers, and one considered education should not be at the point of sale. Another industry submitter believed that education materials would not be required if labelling was removed (saving on time and costs of producing and distributing such material), and that information is already available on websites (e.g. New Zealand MPI website) for those who are interested.

Should the government decide that communication activities are appropriate and outsource these educational activities, some consumer advocacy groups suggested that funding should be provided to organisations with a broad diversity of views to do this work. They noted an example of the previous co-funding to community and industry groups for educational activities about GM technologies. In their view, when consultancies rely on industry contracts as the sole communicators, the messaging is inevitably biased in favour of industry. One consumer submitter believed that the costs of communication activities should not be borne by the taxpayer.

#### 2.4.4 Effectiveness of approaches

The majority of submitters did not provide information on the effectiveness of any alternative approaches. One submitter referred to specific literature which in their view, indicates that information material has been shown to be useful but only in controlled situations (e.g. focus groups or survey respondents). This submitter noted that there is no shortage of information material but the question is how to apply it and referenced literature which they considered highlights the difficulties in communicating risk and benefits.

A New Zealand industry submitter noted that one of the same studies had concluded that the key to gaining acceptance of complex food technologies is earning trust, not simply presenting scientific information. They also referred to a study which found the provision of information increased reported willingness to buy irradiated foods, but in the case of consumers who were strongly opposed to food irradiation, the information did not affect any change. They did not believe that FSANZ has provided sufficient evidence that there would be increased consumer acceptance if more information is provided to them, and the current labelling should be retained, as it forms an integral part of building trust and acceptance.

## 3 DoGooder campaign

The number of submitter responses and general themes are shown for each question in the DoGooder campaign, in the tables below. Specific campaign submitter views are outlined in section 2.

| ***DoGooder campaign Question 1: Are you aware of, do you understand, and how do you respond to food irradiation labels?*** |
| --- |
| **73** submissions did not include any reference or answer to this question.**84** submissions repeated the question, but gave no response to it. |
| **155** submissions gave the following responses to the question. |
| *9 submitters said ‘yes’* |
| *54 submitters said ‘yes’ with clarification, or gave responses indicating that they were aware of and/or understood irradiation labelling* |
| The clarifications were that the submitter: |
| * Would avoid or not choose to buy irradiated food
 |
| * Appreciate that the information is available
 |
| * Consider that consumers have a right to know this information
 |
| *15 submitters stated that they were not aware and/or did not understand irradiation labelling* |
| A number of these submitters further stated that they: |
| * Had not seen any foods displaying information on irradiation
 |
| * Was not aware that foods were permitted to be irradiated
 |
| * Would avoid or not choose to buy irradiated food if they saw the information
 |
| *41 submitters stated that they would not buy irradiated food in the first place* |
| *14 submitters stated that they had never seen any irradiation labelling* |
| *22 general comments made about awareness or understanding irradiation labelling* |
| * Some of these submitters expressed shock or concern that food was allowed to be irradiated
 |
| * Other submitters were pleased that the labelling requirements existed
 |
| * Several submitters commented on the safety aspects of food irradiation.
 |

| ***DoGooder campaign Question 2: Do you buy, or would you consider buying, irradiated food? Yes/No? Why?*** |
| --- |
| **58** submissions did not include any reference or answer to this question.**71** submissions repeated the question, but gave no response to it. |
| **183** submissions gave the following responses to the question |
| *15 submitters said ‘no’* |
| *138 submitters said ‘no’ (or similar negative response) and gave the following reasons* |
| * Concern that irradiated food is unsafe or unhealthy
 |
| * Prefers to buy organic/natural/fresh foods only
 |
| * Irradiation reduces the nutritional quality of the food
 |
| * Concern about exposure to radioactivity
 |
| * Concern that irradiation is a mask to make spoiled foods look fresh
 |
| *4 submitters said ‘yes’ and gave the following reasons* |
| * Have no ideological view against irradiated food.
 |
| * I cannot buy local non-irradiated versions of the food (dates and mangoes were mentioned)
 |
| *17 submitters indicated that they were uncertain if they would buy irradiated food, or that they could be convinced to buy irradiated food* |
| *9 submitters provided unclear responses* |

| ***DoGooder campaign Question 3: FSANZ now only requires a very general statement: ‘to the effect that the food, ingredient or component has been treated with ionising radiation’. Would requiring words such as 'irradiated' or 'treated with irradiation' be clearer?*** |
| --- |
| **54** submissions did not include any reference or answer to this question.**76** submissions repeated the question, but gave no response to it. |
| **182** submissions gave the following responses to the question |
| *104 submitters said ‘yes’ (or gave a similar positive response)* |
| *37 submitters said ‘yes’ (or gave a similar positive response), and provided the following reasons* |
| * The words assist consumers in making better food choices
 |
| * The words are simpler to understand
 |
| * The current wording is confusing or misleading, or is too extravagant
 |
| *9 submitters said ‘no’ (or gave a similar response that the existing requirements were adequate)*  |
| A number of these submitters further stated that: |
| * The present current wording is clear enough
 |
| * Changing the words is unlikely to make a difference to consumers
 |
| * 'Irradiated"' or 'treated with irradiation' does not provide enough information
 |
| *11 submitters stated that the wording of a statement on irradiation was not important, or that any description of the irradiated status was acceptable on labels* |
| *13 submitters suggested alternative or additional types of labelling of a food’s irradiated status* |
| * The nuclear radiation symbol also needed to accompany the words
 |
| * The dose of irradiation should also be included
 |
| * The words should be prescribed
 |
| * Words that refer to the food being dangerous or hazardous to health
 |
| *5 submitters made general comments that irradiation labelling should be clear and easy to understand* |
| *3 submitters provided non-specific responses to this question.* |

| ***DoGooder campaign Question 4: Should required labels on all irradiated foods be removed? Yes/No? Why?*** |
| --- |
| **59** submissions did not include any reference or answer to this question.**64** submissions repeated the question, but gave no response to it. |
| **189** submissions gave the following responses to the question |
| *14 submitters said ‘no’* |
| *138 submitters said ‘no’ (or similar negative response) or stated that irradiation labelling should be retained, and gave the following reasons* |
| * Consumers have the right to be informed of food irradiation
 |
| * Consumers need to make informed food choices
 |
| * Removing this information removes a consumer’s ability to make food choices
 |
| * Consumers need to know about the treatments used on the foods they are eating
 |
| * I need to be warned about food irradiation
 |
| * Labelling information empowers consumers and should not be removed
 |
| *7 submitters said ‘yes’, however the context of their response indicated that they meant ‘no’* |
| *9 submitters said ‘yes’ (or similar positive response)*  |
| *3 submitters asked why irradiation labelling should be removed* |
| 7 s*ubmitters stated that irradiated food needed to be clearly labelled* |
| *11 submitters provided general comments on the removal of irradiation labelling* |
| * Consumers need to make informed food choices
 |
| * The labelling is required to ensure the population is not being poisoned
 |
| * Some submitters indicated that they only wanted to buy organic/natural foods
 |

| ***DoGooder campaign Question 5: Should the wording of irradiation labels be optional instead of required?*** |
| --- |
| **62** submissions did not include any reference or answer to this question.**69** submissions repeated the question, but gave no response to it. |
| **184** submissions gave the following responses to the question |
| *108 submitters stated that the wording should be required, or said ‘no’.* |
| *66 submitters stated that the wording should be required, or said ‘no’, and provided the following further comments.* |
| * All food treatments should be mentioned on the label
 |
| * Consumers have the right to be informed of food irradiation
 |
| * I cannot avoid irradiated foods if I do not know that they are irradiated
 |
| * Mandating the information will ensure that it is clear and unambiguous
 |
| *4 submitters stated that the labelling should be optional or said ‘yes’* |
| *6 submitters provided unclear or non-specific comments on this question* |

| ***DoGooder campaign Question 6: Should irradiated ingredients in restaurant meals still be labelled?*** |
| --- |
| **57** submissions did not include any reference or answer to this question.**68** submissions repeated the question, but gave no response to it. |
| **187** submissions gave the following responses to the question |
| *114 submitters said ‘yes’ (or gave a similar positive response)* |
| *51 submitters said ‘yes’ (or gave a similar positive response), and provided the following reasons* |
| * Consumers have the right to know if the foods they are eating have been irradiated. These include ingredients in restaurant meals and at cafés.
 |
| * I don't want to eat irradiated foods at restaurants
 |
| * If it is the main ingredient of a meal.
 |
| * Consumers need to make informed food choices
 |
| * This information would stop restaurants buying cheaper food and passing it off as higher quality
 |
| *4 submissions stated ‘no’ (or gave a similar negative response)* |
| *3 submissions stated that it would be too difficult to implement irradiation labelling for the ingredients in restaurant meals.* |
| *15 submissions made unclear or non-specific comments* |

| ***DoGooder campaign Question 7: Should irradiated ingredients in processed food still be labelled?*** |
| --- |
| **57** submissions did not include any reference or answer to this question.**70** submissions repeated the question, but gave no response to it. |
| **185** submissions gave the following responses to the question |
| *129 submitters said ‘yes’ (or gave a similar positive response)* |
| *48 submitters said ‘yes’ (or gave a similar positive response), and provided the following reasons* |
| * Consumers have the right to know if the foods they are eating have been irradiated. These include processed foods.
 |
| * Consumers need to make informed food choices
 |
| * There is already too much misinformation available about processed foods
 |
| * Residual radiation does not disappear during processing
 |
| * Because they are still irradiated foods, and should be treated no differently from other irradiated foods.
 |
| *3 submitters stated that irradiation labelling should apply to the following processed foods* |
| * Foods that contain more than 10% of irradiated ingredients, or if the main ingredient is irradiated.
 |
| * Baby foods.
 |
| *3 submitters said ‘no’ (or gave a similar negative response)*  |
| *2 submitters provided unclear or non-specific responses* |

| ***DoGooder campaign Question 8: Should information on the 'safety and benefits' of food irradiation be on food labels?*** |
| --- |
| **65** submissions did not include any reference or answer to this question.**75** submissions repeated the question, but gave no response to it. |
| **172** submissions gave the following responses to the question |
| *50 submitters said ‘yes’ (or gave a similar positive response)* |
| *23 submitters said ‘yes’ (or gave a similar positive response), and provided the following reasons* |
| * As long as it is balanced information and is not manipulated by the manufacturer
 |
| * There is no such thing as safe irradiated food
 |
| * As long as the differences to fresh foods are highlighted
 |
| * So long as government agencies vet this information before it is placed on labels.
 |
| *21 submitters said ‘yes’ (or gave a similar positive response), and mentioned that the risks/downsides of irradiation should also be on food labels.* |
| *16 submitters said ‘no’ (or gave a similar negative response)* |
| *26 submitters said ‘no’ (or gave a similar negative response) and provided the following reasons* |
| * I am not interested in this information
 |
| * This information can easily be found elsewhere
 |
| * No because irradiated foods are not safe
 |
| * There is too much room for manufacturer bias in the information
 |
| * Other foods are not treated in the same way
 |
| * Information on the benefits of irradiation is just promotional material and not labelling information.
 |
| *17 submitters said that that the information should not be on food labels, but could be provided in other forms*  |
| *7 submitters were uncertain or unclear in their responses to this question* |
| *6 submitters stated that there is no safety or benefits to irradiating food* |
| *6 submitters provided unclear or non-specific responses to this question.* |

| ***DoGooder campaign Question 9: Should food irradiation's ‘safety and benefits’ be publicised in other ways, without labels?*** |
| --- |
| **74** submissions did not include any reference or answer to this question.**73** submissions repeated the question, but gave no response to it. |
| **165** submissions gave the following responses to the question |
| *29 submitters said ‘yes’ (or gave a similar positive response)* |
| *26 submitters said ‘yes’ (or gave a similar positive response), and provided the following reasons* |
| * The hazards of eating irradiated food should be widely known.
 |
| * Because an informed public will be able to make their own decisions.
 |
| * Importers and producers of irradiated foods should contribute to public education programmes about the technology
 |
| * As long as it is balanced information and is not manipulated by the food industry
 |
| * Consumers need a more passive way of receiving the info.
 |
| *24 submitters stated that this information must also be provided on the labels of irradiated foods.* |
| *23 submitters said that this information could be publicised as long as the risks/downsides of irradiation were also publicised.* |
| *20 submitters said ‘no’ (or gave a similar negative response)* |
| *27 submitters said ‘no’ (or gave a similar negative response) and provided the following reasons* |
| * I am not interested in this information.
 |
| * This information can easily be found without promotion
 |
| * The information would be more effective on food labels
 |
| * Alternative publication would mean that the information becomes buried online
 |
| * This form of publication would not be effective
 |
| *4 submitters said that the food industry should be responsible for promoting the safety and benefits of irradiated food* |
| *12 submitters provided non-specific responses to this question.* |

| ***General comments*** |
| --- |
| **64** submissions made comments that did not relate to the campaign structure.  |
| *30 submitters said that consumers have a right to know about the food that they are eating.* |
| *8 submitters commented that irradiated food is unsafe and/or provided information about the dangers of consuming irradiated food.* |
| *6 submitters stated that they wanted to be able to decide between fresh/natural foods and irradiated foods when shopping.* |
| *3 submitters said that they want clear labelling on our food, with one mentioning that it should be in a font size that can be read.* |
| *3 submitters said that irradiation destroys the quality of the food* |
| *3 submitters were of the view that food irradiation is a clean-up technology used to cut costs and cover up industry's poor management practices, including fruit fly control.*  |
| *2 submitters mentioned that if consumers lose trust in a product they will rarely return to it. Better to label honestly and let the market place decide.* |
| *2 submitters made comments that consumers demand labels on all irradiated foods, particularly for imported foods.* |
| *2 submitters said that they care about the environment and the safety of their families, and that this was the reason for supporting the mandatory labelling of irradiated food.*  |
| *1 submitter requested an investigation into the effects of microwaves on the human body*  |
| *1 submitter expressed concern about the labelling of ingredients* |
| *1 submitter said that an individual’s decision to not choose irradiated food should be respected.*  |
| *1 submitter was of the view that the work of FSANZ so far on food safety is below acceptable.* |
| *1 submitter mentioned that government regulation is an important part of safeguarding the interests of the general population.* |

## 4 Food Irradiation Watch campaign

Fourteen submitters provided a copy of a campaign letter produced by Food Irradiation Watch. Comments from the Food Irradiation Watch letter have been allocated against questions provided in the consultation paper as shown.

|  |  |
| --- | --- |
| **Question in Consultation Paper** | **Comment in the Food Irradiation Watch campaign letter** |
| 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 the changes made to food by irradiation cannot be discerned with our ordinary senses, labelling is the only means to differentiate between irradiated and non-irradiated products.
* The demand for irradiated products should be driven by consumers making informed and intentional decisions to purchase such products – not by being tricked in to buying them.
 |
| Do you purchase, or would you consider purchasing, irradiated food? If yes, then why? If no, then why not? | * I choose to not eat irradiated food.
 |
| What are your views about the wording of the statement not being prescribed? | * Rather than being removed, labelling should be improved to prescribe clear and accurate statements such as: “Irradiated – “or “Treated with irradiation.”
 |
| 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? | * I am disappointed that FSANZ is considering removing labelling from food that has been irradiated when it is clear that public and world standards demand that it be labelled.
* With Australia and New Zealand increasing the amount of irradiated foods available on the market and in people’s diets, the push to remove mandatory labelling and signage requirements is unacceptable - and must be stopped.
 |
| If labelling was to continue for irradiated whole foods, do you think:* Restaurant meals containing irradiated ingredients should still be labelled?
* Irradiated ingredients used in packaged food should still be labelled?
 | * Irradiators who are confident that their products are wholesome, healthy and desirable should be proud to label their products irradiated and let the market play out
 |