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23rd March 2016

**Re: Submission to Food Standards Australia New Zealand on Labelling Review
Recommendation 34: Review of mandatory labelling of irradiated Food.**

We grow around 6,500 tonnes of capsicums year round in 23ha of glasshouse in Warkworth, New Zealand. We export around half of our crop to markets in Japan, Australia and Canada

We believe the current labelling requirements for irradiated food to be retained, or strengthened to include individual labelling of loose irradiated produce.

We know that consumers want the want the labelling to be retained (as shown by Tomatoes New Zealand's 2015 consumer survey), and want the ability to choose. They can only choose if the compulsory labelling is retained.

We are concerned that without labelling, consumers who do not want to purchase irradiated food will be put off buying all fresh tomatoes, and this could affect the market for New Zealand tomatoes.

FSANZ has a responsibility to ensure "the provision of adequate information relating to food to make informed choices. It is our view that labelling irradiated foods is an important aspect of allowing those informed choices. FSANZ also needs to make sure that the labelling requirements are being met by food retailers.

We support the use of measures, including irradiation (with field controls) to prevent the entry of fruit flies into New Zealand.

Our responses to the relevant consultation questions are below.

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?

We do not have any information

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

No

Irradiation damages food by breaking up molecules and creating free radicals. The free radicals kill some bacteria, but they also bounce around in the food, damage vitamins and enzymes, and combine with existing chemicals (like pesticides) in the food to form new chemicals, called unique radiolytic products (URPs).

Some of these URPs are known toxins (benzene, formaldehyde, lipid peroxides) and some are unique to irradiated foods. Scientists have not studied the long-term effect of these new chemicals in our diet. Therefore, we cannot assume they are safe.

Also, Irradiated foods can lose 5%-80% of many vitamins (A, C, E, K and B complex). The amount of loss depends on the dose of irradiation and the length of storage time.

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?

We believe that the current labelling requirement provides enough information for consumers to make an informed decision, as long as the labelling requirements are being met by retailers.

Requiring individual labelling of irradiated loose fresh produce in addition to the current labelling requirements, would reduce consumer confusion over what is and what isn't irradiated, and prevent lack of compliance with the labelling requirement by produce retailers.

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

We are comfortable with the wording not being prescribed, as long as the need for it to be a "statement to the effect that the food has been treated with ionising radiation" is retained, along with the examples of wording that can be used.

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

The symbol is not necessary, and we suspect not widely recognised or understood as representing treatment with irradiation. We would prefer to retain the use of wording, without the symbol.

If the symbol is used, it should have to be accompanied by a statement as per the current statement requirements.

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

No.

The TomatoesNZ consumer poll clearly shows that this is not what NZ consumers want.

Simply communicating the benefits of irradiation to consumers does not mean that they will accept the treatment. Building trust is more important, and trust requires transparency, which labelling provides.

Removing the labelling requirement will also result in NZ and Australia being out of step with the rest of the world on labelling irradiated food.

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

Yes, because again, the TomatoesNZ consumer survey clearly showed that this is what consumers want.

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

Yes, again because the TomatoesNZ consumer survey clearly showed that consumers want to know if their food is irradiated.

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

No. There is no commercial irradiation treatment plant in New Zealand.

As a grower we have no interest in irradiating our product, and have no phytosanitary or food safety issues that would require such treatment.

Additionally, irradiation does not fit with our brand image.

10. – 15. Questions for food manufacturers and food service

Not applicable.

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?

No, we have not conducted any research ourselves but we are aware of a general negative view by consumers on radiated fruit and vegetables

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

No, because:

1. We don't use irradiation in NZ
2. Other markets all require irradiated food to be labelled (as per "Attachment C" of the consultation document)

It seems to us that the only reason for the labelling requirement being an impediment to developing markets would be because of consumer resistance to irradiation. Therefore removing the labelling requirement would be deceptive, and against FSANZ's statutory

role in “The provision of adequate information relating to food to enable consumers to make informed choices”.

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).

We believe that the costs mandatory of labelling are negligible. We already provide many other types of labelling and product information to wholesalers, so adding irradiation labelling (in the event we ever did irradiate) would not be an issue.

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).

We are concerned that consumers will not understand or realise that almost all of the tomatoes available on the New Zealand market are produced in New Zealand, and are not irradiated.

Removing the need to label irradiated product means there is no differentiation between irradiated and non-irradiated product, and we are concerned that this will impact sales of New Zealand tomatoes, as consumers will not be able to tell the difference between irradiated and non-irradiated tomatoes.

We would prefer to see a requirement for individual labelling of irradiated loose produce, to ensure that there is no confusion in consumers’ minds about what is, and what isn’t irradiated. This would also remove the labelling onus and cost from the retailer and place it with the grower/packer/exporter, where it should be.

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?).

Not applicable

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?

Not applicable

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

We are comfortable with the safety and benefits of irradiation being included on labels.

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

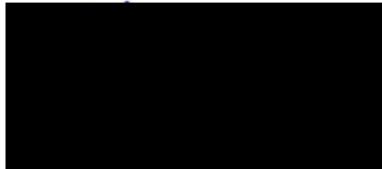
We believe that even if other methods are used, mandatory labelling should be retained, so that consumers can differentiate irradiated from non-irradiated product, and because maintaining consumer trust is crucial.

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

No.

Thank you for the opportunity to comment on this review.

Yours sincerely



[Redacted Name]

Marketing & Distribution Manager

