

This part of our submission addresses the farce of the labelling of irradiated foods in NZ.

When the ban/moratorium of the irradiation of food was lifted following the ANZFS

Approval of Standard 17 Food Irradiation in late 1999, there had been a draft which not only required clear labelling of all irradiated foods, but also proposed minimum lettering size for such labels. FoE(NZ) submitted that the minimum size was too small, however such concerns were ignored and the final Standard contained no stipulation whatever regarding minimum label lettering size. Things went downhill from there. Many of the early irradiated mangoes each had an individual rectangular sticker {See below for colour photocopies of sample mango stickers.} which, with black ink on a white background, was both noticeable and able to be read by the consumer. It often contained a green Radura image, but people did not know what it signified.

When media controversy arose about the irradiation of mangoes, the QLD marketers etc got the bright idea to replace the readable separate label with a coloured small brand ID sticker that had tiny concealed “irradiation” wording. The first issue here is that consumers do not expect product information to be squeezed into the tiny fruit brand sticker, and they do not expect – nor should they, to have to take a magnifying glass to the supermarket to find out basic legally required product information.

The lettering on current irradiation labels on mangoes is only half the width of a paperclip wire. I have taken samples of these so-called labels to my Auckland optometrist and asked if a person with normal vision could read them. He examined them and his professional opinion was that they could not be read by the average adult and were so small that only a young person with perfect vision would be able to read them – and further more they would first have to know that they were meant to look for them on the surrounds of the brand sticker or above the bar code.

But even this degree of deception and concealment was not enough for the QLD mango marketers. To make the necessary consumer info even harder to notice and read, they abandoned the plain black ink and used colour tricks – printing with pale green ink onto a yellow or blue background. The worst offenders in these tricks are Marto's. Perhaps it is no co-incidence that Marto's have earlier partnered with the applicant – QLD DAF, in intense mango production. (Growers trial high density mango systems –AMIA).



Crucial to this application is the actual consumer having an informed choice. It is claimed in p 59 that “The mandatory labelling of irradiated fruit and vegetables provides consumers with choice when it comes to purchasing or not purchasing irradiated fruit and vegetables”. We submit that this is nonsense, as illustrated above. My personal experiences confirm that many NZ shoppers have selected irradiated mangoes without seeing the tiny label and thus not realising that they had been irradiated. Many of these consumers were angry at being deceived, and put them back.

The FSANZ report in 2017 on the necessity of labelling irradiated products found “concerns about providing information to enable informed choice”. We submit that the info must be clearly conveyed via labels that are prominent with plain lettering of a minimum size. It is clear from the examples above that the mango marketers DO Not want the NZ consumers to have this necessary info upon which to base any informed choice. Further we submit that there should be a moratorium on the sale of any irradiated foods in NZ until the regulations are changed to remedy this crucial ongoing problem. The ACA report on Irradiated Foods also regarded clear labelling as absolutely essential.

In the second part of our submission, which will be emailed tomorrow, we shall expand on further problems with this application, including correspondence showing that there has been no follow up or penalties imposed following on from formal complaints when irradiated mangoes have been illegally sold with no labelling whatsoever.