

24 March 2016

Food Standards Australia New Zealand
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By email: submissions@foodstandards.gov.au

**SUBMISSION on
Labelling review recommendation 34 consultation paper:
Review of mandatory labelling of irradiated food**

1. Introduction

Thank you for the opportunity to make a submission on the "Review of mandatory labelling of irradiated food" consultation paper. This submission is from Consumer NZ, New Zealand's leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

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2. Overview

We have provided responses to selected questions in the consultation paper below.

Question 3 – Does the current labelling requirement for irradiated food provide enough information for you to make an informed choice about the food you buy?

For consumers, the main issue in regard to current labelling requirements is that labels are not always displayed. As FSANZ may be aware, there are reports irradiated foods are being sold in New Zealand without a label. There are also reports food retailers are unaware of their obligations to label irradiated foods.

The lack of a consistent format for labelling is also potentially problematic for consumers. For labels to be used to inform decision making, they need to be clear, prominently located and legible (i.e. in a font size that will enable consumers to easily read the label).

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

Our preference would be for an approach similar to that adopted in Canada, the EU and the US where foods are labelled with a statement such as “irradiated”, “treated with radiation” or “treated by irradiation”.

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

The Radura symbol is not well-known in New Zealand and is likely to be of limited use to consumers on its own. Given its similarity to certified organic symbols (such as the “bio-gro” symbol), it also has the potential to confuse consumers rather than provide useful information.

Question 6 – Do you think the current labelling requirement for all foods permitted to be irradiated should be removed? If yes, then why? If no, then why not?

No, we do not think the current labelling requirement should be removed.

As noted in the consultation paper, many countries require irradiated foods to be labelled. Removing the labelling requirement in New Zealand would therefore put us out of step with international norms.

The move would also reduce the information available to consumers on which to base purchasing decisions, at a time when there is increasing demand for more information about the origin and preparation of food products.

While there is limited research on irradiated foods, the findings of other research on food labelling consistently show strong consumer demand for mandatory labelling. For example, a 2013 study by Massey University researchers found 87 percent of respondents wanted mandatory origin labelling for fresh fruit, meat and vegetables.¹

Removing the requirement to label would also remove a source of information that can be used as a proxy for whether a food is imported. Given New Zealand does not have mandatory country of origin labelling, information about whether a food has been treated by irradiation can indicate its origin.

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

Yes, we think restaurant meals should still be labelled. As above, labelling assists consumers to make informed purchasing decisions.

¹ Holdershaw, J., Gendall, P., and Case, P. (2013.) “Country of origin labelling of fresh produce: Consumer preferences and policy implications.” *Market & Social Research*, Volume 21, Number 2. Retrieved 23/3/16 from <http://www.amsrs.com.au/documents/item/1284>

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

Yes, we think irradiated ingredients should still be labelled.

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

As stated above (question 4), our preference would be for an approach similar to that adopted in Canada, the EU and the US where foods are labelled with a statement such as "irradiated", "treated with radiation" or "treated by irradiation".

Thank you for the opportunity to make a submission on the consultation paper. If you require any further information, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read "Sue Chetwin". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Sue Chetwin
Chief Executive