**FOR ONLINE SUBMISSIONS:**

**Despite labelling being the global norm and the public demand for labelling, the government is “reviewing” mandatory labelling requirements for irradiated food.**

**Should Aussies and Kiwis be kept in the dark about food irradiation?**

**Your say: Should irradiated food be labelled?**

Ministers responsible for food regulation have asked Food Standards Australia New Zealand (FSANZ) to review Standard 1.5.3 – Irradiation of Food, specifically to:

* assess the need for the mandatory labelling requirement for all irradiated food to continue, and
* assess whether there is a more effective approach to communicate the safety and benefits of irradiation to consumers.

Our thoughts: The irradiation of fruits and vegetables typically involves their exposure to the energy equivalent of between 1.5 and 10 million x-rays. When now promoted as a fruit fly “treatment”, food irradiation also extends shelf life, sanitises, and alters the nutritional value of the treated foods.

Numerous reports question the safety and wholesomeness of irradiated food. The substantial and significant changes made to fruits and vegetables as a result of processing with irradiation cannot be discerned with our ordinary senses. Thus, consumers could no longer rely on taste, smell, texture or appearance to exercise their preference for fresh produce, if irradiation labelling were removed.

Globally, labelling is the norm. In Australia and New Zealand, all irradiation permits have been premised on the irradiated food being labelled as such. The removal of labelling from irradiated fruits and vegetables will create a situation where the public will be led to false, misleading and deceptive conclusions as to the nature of these foods, also impacting on their right to make well-informed food buying decisions that potentially impact on their diet and health.

FSANZ has now published its “consultation paper” and is inviting public input March 29.

Below are some suggested answers to the questions.

Make an online submission here: <http://www.foodstandards.gov.au/consumer/labelling/review/Pages/Labelling-review-recommendation-34irradiation-labelling.aspx>

No time to do the whole questionnaire? Make your general submissions here: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

Be sure to include in subject line: RE: Recommendation 34” Review of Labelling of Irradiated Food

To get involved in the campaign to ensure that irradiated food is labelled:

Email: [foodirradiationwatch@yahoo.com.au](mailto:foodirradiationwatch@yahoo.com.au)

[www.foodirradiationwatch.org](http://www.foodirradiationwatch.org)

LIKE us on FB: <https://www.facebook.com/notofoodirradiation/?fref=nf>

**ON LINE SUMBISSION SAMPLE ANSWERS**

**RE: REVIEW OF LABELLING REQUIREMENT FOR IRRADIATED FOODS (Labelling Logic recommendation 34)**

Feel free to answer all or simply respond to those you feel are relevant to you. You may like to feedback on the industry targeted questions, even though you may not be working in the field. It is our opinion that all questions are relevant to consumers.

**All submitters (Q1-Q8)**

**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?**

**Some sample responses:**

* I know I would not knowingly purchase irradiated food.
* I know that in the 1990s a huge campaign won a moratorium on food irradiation in Australia which was lifted after 10 years without much consumer awareness. I believe that most people would not choose to eat irradiated food.
* The fact that irradiation was banned in Australia – and that in 2003 the Senate passed a motion for no further irradiation approvals is testament to community opposition.
* The fact that 87-100 Australian cats developed neurological disorders attributed to consuming irradiated food – and now the irradiation of cat food is banned – and dog food must be labelled- suggests that irradiation has a chequered history in Australia.
* I know that if food is irradiated, I expect it to be clearly labelled with the words: Irradiated or treated with radiation/irradiation.
* I know that all irradiation approvals to date have been premised on the notion that all irradiated food will be labelled. It would be disingenuous to remove labelling so clearly identified as part of the approval process.
* I know that industry proponents would like to see labellinq requirements removed – which I believe would lead me to falsely presume that a food was not irradiated – or processed.

**Accessible Polling or Research on the issue:**

**Public concern:** In recent polling in New Zealand - where irradiated Australian produce is being marketed – 72% of respondents expressed concern.

[*http://www.nzherald.co.nz/opinion/news/article.cfm?c\_id=466&objectid=10892295*](http://www.nzherald.co.nz/opinion/news/article.cfm?c_id=466&objectid=10892295)

**The public wants irradiated food to be labelled:**

*‘In October 2001, FSANZ commissioned qualitative research to examine Australian and New Zealand consumer understanding and use of various label elements (NFO Donovan Research 2001)… the general consensus was that even though the word was alarming and off-putting, that it should be used on packaging rather than a symbol, again because people had a right to know what has been done to their food…”*

*“Tomatoes NZ (the industry body that represents the fresh tomato sector) commissioned a telephone poll of 1000 New Zealand adults 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. (Eighty-five per cent of participants responded that*

*they would).*

*• to know if a dish they ordered in a restaurant, café or takeaways includes*

*irradiated food. (Seventy-eight per cent of participants responded that they*

*would). “ (Review document p14-15)*

Indu**stry is wary of promoting irradiated food:**

At a 2012 Horticulture Australia Limited (HAL) Forum in Sydney, Paul Harker, head of produce, Woolworths said the industry needed a united voice on the subject before it proceeds…

*“It’s going to be an extremely emotional product and we are not going to stand alone trying to convince Australian consumers that there is nothing wrong with irradiation,” Mr. Harker said.*

*“We’ve communicated that back to industry and we said unless there is a concerted campaign that is led not only by the people peddling irradiation as an alternative, but unless the government and everyone else is involved in actually talking to the customer about it, the last thing I am going to do is plonk it on my shelf because I can tell you that fresh produce sales will die. People won’t shop there.”* (our emphasis)

<http://www.theland.com.au/news/agriculture/horticulture/general-news/irradiation-pros-and-cons/2665981.aspx?storypage=0>

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

* **if yes, then why?**
* **if no, then why not?**

**Some sample responses:**

* No! I choose to eat non-irradiated food because:
* No! I believe that the process is unnecessary,
* No! it changes the molecular structure of the food,
* No! the science is divided as to its safety and
* No! there are numerous alternatives to irradiation.

**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?**

***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.***

**Sample response:**

I believe that mandatory labelling to that effect is necessary – AND I believe the wording of that labelling needs to be prescribed to include: a choice of the words: “irradiated” “treated with radiation/irradiation”.

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

**Some sample responses:**

* I believe it is imperative that the words be prescribed to state either: “irradiated” “treated with radiation/irradiation”.
* I am aware that irradiation proponents have used misleading or unfamiliar terms on their labelling – such as “radurised” or “treated with ionising electrons” which confuse the public.
* I am also aware that proponents frequently attempt to use the terms “cold pasteurisation” or suggest that irradiation is similar to pasteurisation which is also both scientifically inaccurate and misleading.
* I believe the Radura mark should not be used as it is deceptive in that it suggests a budding flower when in fact irradiation stops flowers/plants from sprouting
* I believe that “positive” statements should not be permitted on irradiation labelling unless statements about potential allergencity or nutritional compromise be included.

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

**Some sample responses:**

* The Radura symbol is unfamiliar to myself and the people I know.
* I believe it is unfamiliar to most people.
* I believe the Radura mark should not be used as it is deceptive in that it suggests a budding flower when in fact irradiation stops flowers/plants from sprouting

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?**

**Some sample responses:**

* NO! The current labelling requirements have been put in place to inform the Australian and New Zealand public about the unfamiliar and food-altering process of irradiation.
* NO! All irradiation approvals in Australia and New Zealand have been made with the premise and promise that irradiated food will be labelled. Labelling is the status quo and expected. To remove labelling would be a breach of faith and misleading to the public.
* NO! To remove labelling is to deny the public any access to informed choice and is unconscionable.
* NO! I am shocked that research shows the government and industry would like to have labelling removed in order to increase consumer acceptance of irradiated food – by keeping public unaware that a product has been irradiated.
* NO! Without labelling, Irradiated fruits would be marketed as “fresh” despite being exposed to 150Gy - 1kGy of ionising radiation, which is equivalent to approximately: 1.5 million – 10 million chest x-rays per exposure. Irradiation decreases the vitamin and nutritional content of food and disrupts its molecular structure, producing free radicals and potentially harmful chemicals such as benzene, formaldehyde and cyclobutanones.
* NO! I am outraged that the food regulator would pursue a path of removing the public’s right to know about a process with chemically alters our food – and is not discernible to the eye. It is frightening that the government is committing to a process to make people LESS aware about processes used in food production.
* NO! I believe the government has a duty of care to ensure the public is informed about processes which:
  + people have concerns about
  + Has scientists and nutritionists divided
  + Is invisible and therefore cannot be detected by the public
* NO! Global standards – such as the CODEX guidelines - require irradiated food to be labelled.

In fact, removing labelling would make Australia the odd-ball amongst its trading partners – and likely increase costs for food producers who would need to ensure that their export products are labelled appropriately for overseas markets.

* NO! Labelling is the global norm. Australia and New Zealand should be strengthening labelling, not removing it. In the consultation paper, FSANZ states:
  + “FSANZ has reviewed the requirements for food irradiation label information in a number of countries. Most of the countries reviewed appear to have based their requirements on the Codex Standard, although some variations occur.
  + For irradiated whole foods that are packaged, it is common for a mandatory statement to indicate that the food has been irradiated…
  + For packaged foods that contain an irradiated ingredient(s), most countries require that the ingredient(s) be identified on the label, usually in the list of ingredients…
  + Most countries require specific signage for unpackaged foods that have been irradiated (e.g. whole produce) and are sold in bulk….”
  + Furthermore, “FSANZ does not know whether other countries have previously considered, or are considering, changing or removing their food irradiation information requirements.” (All Public Consultation Paper p10)

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

**Sample response:**

* Yes! All irradiated foods should be labelled. They public should be informed of any and all irradiated components.

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

**Some sample responses:**

* Yes! All irradiated foods should be labelled. They public should be informed of any and all irradiated components.
* All of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would be a breach of faith and misleading to the public.

**Produce growers: (FI Watch says “CONSUMERS” please respond too)**

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

**Some sample responses:**

* NO! (if you are a producer) I choose not to irradiate because it is unnecessary and I understand that the public does not want to eat irradiated food. It would be disingenuous of me and my company to ask for labelling to be removed in hopes of trick peopling into eating food processed in a way that people opposed
* Or…. From a consumer’s perspective, if producers are not using a process because they have to label it, it is clear that they are concerned about consumer resistance to irradiation. It is trickery to remove labelling to get people to purchase irradiated food. If the process is positive, useful and healthy producers should be proud to label their irradiated products – and let the market decide.

**Food manufacturers:**

**10. Do you use irradiated ingredients in your products? (For example, tomato paste, herbs & spices).**

**Some sample responses:**

* NO! We prefer to avoid irradiated ingredients.
* NO! In some cases, due to inadequate testing by the government, it is difficult for us to monitor the entire supply chain.
* NO! Our products are not permitted to be irradiated or use irradiated ingredients.

**11. Does the fact that irradiated foods have to be labelled impact on your decision to use them?**

**Sample response:**

* No! – We understand that people are concerned about irradiation - as we are ourselves. We choose to use avoid irradiation.

**12. How important is the labelling factor alongside other factors? (For example, price, availability of ingredients, quality of produce, reputation of supplier).**

**Some sample responses:**

* We understand the need to label irradiated products.
* As labelling is the status quo, we appreciate the opportunity to inform the public about our products.
* We are concerned that irradiated foods remain labelled because we choose NOT to irradiate.
* Removing the labelling requirement would mean that our non-irradiated products are not distinguishable from irradiated products. This would disadvantage, would make the market place less competitive and unfairly place the cost and onus upon us to distinguish ourselves from irradiated products.

**13. If the mandatory labelling requirement was removed for irradiated ingredients used in processed foods, would your company be more likely to use irradiated ingredients**?

**Some sample responses:**

* NO! Our company chooses not to irradiate as we have concerns about irradiation and are aware that consumers do not want to eat irradiated foods.
* NO! We would not like to be perceived as so unscrupulous that we would trick the public in to purchasing an irradiated product by not labelling it.

**Food service providers:**

**14. Do you use irradiated whole foods in your products? (For example, irradiated tomatoes in sandwiches).**

**Some sample responses:**

* Food service providers: NO! We choose to avoid irradiated whole foods and ingredients.

or

* Shoppers: I choose not to purchase from businesses that use irradiated ingredients.

**15. If the mandatory labelling requirement was removed for irradiated whole foods, would you still ask suppliers to label the food?**

**Some sample responses:**

* Food service providers: Yes! We are aware that the public has real and legitimate concerns about irradiation and we would expect our suppliers to inform us.
* Shoppers: I choose not to purchase from businesses that use irradiated ingredients.
* All of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would cause us to play a part in a gross deception of the public and damage our reputation and reliability.

**All industry submitters**

**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?**

**Some sample responses:**

From Food Irradiation Watch:

Food Irradiation Watch has conducted both industry and consumer research on irradiated food. In 2005, after surveying 1000 Australian food producers, we published Irradiation-Free Food Guide, which was slightly updated in 2007. With virtually no budget, by word of mouth promotion through individual and on-line orders, over 25,000 copies of this Guide were distributed. FI Watch continues to receive enquiries from concerned consumers of both human and pet food – as well as consumers and distributers of therapeutic goods.

Public consultation on food irradiation applications has also shown the responding public to be overwhelmingly opposed. For example, in the final round of public consultation on the irradiation of tropical fruit, 675 submissions were made against the proposal. There were only 16 in favour. The application was still approved.

The fact that irradiation was banned in Australia – and that in 2003 the Senate passed a motion for no further irradiation approvals is testament to community opposition.

Furthermore, the fact that 87-100 Australian cats developed neurological disorders attributed to consuming irradiated food – and now the irradiation of cat food is banned – and dog food must be labelled- suggests that irradiation has a chequered history in Australia.

Research commissioned by irradiation reveals little public awareness about irradiation and consumer’s desire to be informed through labelling. FSANZ’s consultation papers confirm this.

In recent polling in New Zealand - where irradiated Australian produce is being marketed – 72% of respondents expressed concern.

[*http://www.nzherald.co.nz/opinion/news/article.cfm?c\_id=466&objectid=10892295*](http://www.nzherald.co.nz/opinion/news/article.cfm?c_id=466&objectid=10892295)

*‘In October 2001, FSANZ commissioned qualitative research to examine Australian and New Zealand consumer understanding and use of various label elements (NFO Donovan Research 2001)… the general consensus was that even though the word was alarming and off-putting, that it should be used on packaging rather than a symbol, again because people had a right to know what has been done to their food…”*

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*• the fruit and vegetables they buy that have been treated with irradiation to be*

*clearly labelled as irradiated. (Eighty-five per cent of participants responded that*

*they would).*

*• to know if a dish they ordered in a restaurant, café or takeaways includes*

*irradiated food. (Seventy-eight per cent of participants responded that they*

*would). “ (Review document p14-15)*

It is also clear that industry is wary of selling irradiated food:

At a 2012 Horticulture Australia Limited (HAL) Forum in Sydney, Paul Harker, head of produce, Woolworths said the industry needed a united voice on the subject before it proceeds…

*“It’s going to be an extremely emotional product and we are not going to stand alone trying to convince Australian consumers that there is nothing wrong with irradiation,” Mr. Harker said.*

*“We’ve communicated that back to industry and we said unless there is a concerted campaign that is led not only by the people peddling irradiation as an alternative, but unless the government and everyone else is involved in actually talking to the customer about it, the last thing I am going to do is plonk it on my shelf because I can tell you that fresh produce sales will die. People won’t shop there.”*

(our emphasis) <http://www.theland.com.au/news/agriculture/horticulture/general-news/irradiation-pros-and-cons/2665981.aspx?storypage=0>

As the regulator, FSANZ should be conducting its own research – not relying on the industry to provide its research, without verification and independent review.

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

**Some sample responses:**

* NO! Global food standards, CODEX and most of our trading partners – and all of the countries listed in the discussion paper – require more stringent labelling than Australia as it is. NOT labelling irradiated products for our domestic market would see us incur the added cost of labelling our products for the overseas markets which require labelling – generally prescribing the words to include “ irradiated” or “treated with irradiation” .
* NO! Not labelling irradiate products would call in to question Australia’s transparency and reliability as a global trading partner and would be bad for our reputation.
* NO! Australia’s regulations should be improved to fall in line with global mandatory labelling requirements.
* NO! In fact, all of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would be a gross deception to the public – who though perhaps divided on novel technologies demand and expect them to be labelled.

**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).**

**Some sample responses:**

* Irradiation is the status quo and is the status quo in our trading partners. Therefore, labelling should be considered a pre-requisite to all irradiation approvals.
* The costs are no greater than the labelling already required.
* As the current regulations state that individual labelling is not required and that a sign nearby will suffice, there is virtually no cost associated with labelling of irradiated foods.
* If individual labelling of produce was prescribed, the cost would be a minimal – one off - design fee cost associated with placing the labelling statement on the sticker or package.
* For new products, labelling costs will be no more than those attributable to general package design – in particular as labelling is already the norm and is expected.
* In fact, all of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would be a gross deception to the public – who though perhaps divided on novel technologies demand and expect them to be labelled.
* Global food standards, CODEX and most of our trading partners – and all of the countries listed in the discussion paper – require more stringent labelling than Australia as it is. NOT labelling irradiated products for our domestic market would see us incur the added cost of labelling our products for the overseas markets which require labelling – generally prescribing the words to include “ irradiated” or “treated with irradiation” .
* Mandatory labelling allows us to help the public make informed choices about what they eat. It is important to us that our company appears to be honest, reliable and forthright with the public so that they can maintain long-term trust in our products.

**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).**

**Some sample responses:**

* Mandatory labelling allows us to help the public make informed choices about what they eat. It is important to us that our company appears to be honest, reliable and forthright with the public so that they can maintain long-term trust in our products.
* Removing the labelling requirement would mean that non-irradiated products are not distinguishable from irradiated products. This would disadvantage producers and would make the market place less competitive. It would unfairly place the cost and onus upon non-irradiators to distinguish themselves from irradiated products.
* All of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would be misleading to the public and lead to the questioning of our corporate integrity.
* Global food standards, CODEX and most of our trading partners – and all of the countries listed in the discussion paper – require more stringent labelling than Australia as it is. NOT labelling irradiated products for our domestic market would see us incur the added cost of labelling our products for the overseas markets which require labelling – generally prescribing the words to include “ irradiated” or “treated with irradiation” .
* Mandatory labelling allows us to help the public make informed choices about what they eat. It is important to us that our company appears to be honest, reliable and forthright with the public so that they can maintain long-term trust in our products.

**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?).**

**Some sample responses:**

* Irradiation is the status quo and is the status quo in our trading partners. Therefore, labelling should be considered a pre-requisite to all irradiation approvals.
* The costs are no greater than the labelling already required.
* As the current regulations state that individual labelling is not required and that a sign nearby will suffice, there is virtually no cost associated with labelling of irradiated foods.
* If individual labelling of produce was prescribed, the cost would be a minimal – one off - design fee cost associated with placing the labelling statement on the sticker or package.
* For new products, labelling costs will be no more than those attributable to general package design – in particular as labelling is already the norm and is expected.
* In fact, all of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would be a gross deception to the public – who though perhaps divided on novel technologies demand and expect them to be labelled.

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**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?**

**Some sample responses:**

* **This question is not relevant to the review of mandatory labelling requirements. Whether or not industry reaps benefits or accrues cost from irradiation does not negate the fact that labelling is the global standard and desired by the public.**
* Furthermore, benefit and relative safety of a process do not negate the validity and importance of labelling novel foods – or foods using technologies unfamiliar to most people – in particular those about which the public have expressed concern.
* Irradiation is one of numerous post-harvest and food treatments available to food producers. We choose to not irradiate as numerous alternatives exist and we understand that people generally do knowingly want to eat irradiated food.
* Irradiation is known to deplete vitamin and nutrient content as well as potentially harmful substances in food. While this may be the case for many food processes, irradiation is not done in isolation. Irradiation is done in conjunction with pre-harvest chemicals, cold storage, possible heat treatment and cooking of food. Irradiation is often seen to be expensive and, due to lack of facilities, may increase transport time for products.
* Not labelling irradiate products would call in to question Australia’s transparency and reliability as a global trading partner and would be bad for our reputation.
* Australia’s regulations should be improved to fall in line with global mandatory prescribed wording requirements.
* In fact, all of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would be a gross deception to the public – who though perhaps divided on novel technologies demand and expect them to be labelled.

**All submitters**

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

**Sample response:**

* I believe that “positive” statements should not be permitted on irradiation labelling unless statements about potential allergencity or nutritional compromise be included.

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

**Some sample responses:**

* We do not believe that “communicating the safety and benefits of food irradiation” - which is primarily a marketing program - is the role of FSANZ.
* We question the safety and benefits of irradiation.
* We are aware of attempts to equate irradiation with pasteurisation, to promote positive statements, use the Radura mark (which looks like a budding flower), to use euphemisms, such as “treated with ionising electrons” to make irradiation seem innocuous. We think this is inappropriate.
* We are aware of FSANZ material acting as an irradiation promoter rather which we think is inappropriate. For example: FSANZ’s website exaggerates the use of irradiation (it is approved in many countries, yes, but it is not widely used. FSANZ also dumbs down the science of irradiation –likening ionising radiation to microwaves and failing to discuss the source or strength of gamma radiation used. “The rays pass through the food just like microwaves in a microwave oven, but the food does not heat up to any significant extent.” This is misleading and inappropriate.
* The scientific opinion re the safety of irradiated food is divided. While in some cases overseas, irradiation has been promoted as a response to food –borne illnesses, irradiation cannot be presumed to be an alternative to good, clean, well-managed food production practices.
* While the Australian TGA does support the use of irradiation in therapeutic good ingredients – for sterilisation or sanitation purposes - it does not support irradiation for the ongoing treatment of products.
* Biosecurity Australia also notes

***“****It is now well established that irradiation does affect certain vitamins and other nutrients and does produce peroxides and other radiolytic by-products, some of which may be toxic and/or carcinogenic, and that these effects are dose related.”*

*“The available scientific evidence supports the use of irradiation as a biosecurity treatment for pet food only in exceptional circumstances. It is not supported for those products likely to be consumed as a significant proportion of an animal’s diet (e.g. kibble).”*

**http://www.agriculture.gov.au/biosecurity/risk-analysis/reviews/final-animal/gamma-irradiation/questions-and-answers**

This indicates that even federal government scientists do not support the ongoing use of irradiation as a production practice for complete products. Food Standards Australia New Zealand should apply the same rigour in limiting promotion of irradiation in production practices,

* The “safety and benefits” that FSANZ want to “communicate” are also unspecified.
* “Safety” may refer to the “safety” of the industry – which in Australia is a nuclear industry carrying its associated risks around the transportation, use and storage of radioactive materials.
* Or “Safety” may refer to the inferred “wholesomeness” of irradiated foods – which is at best questionable.
* Or “Safety” may refer to the “decontamination” aspects of some irradiation – which can neutralise but not remove some pathogens from food. The fact is, that for the most part, irradiation in Australia has not been authorised for food “safety” reasons – which could call for higher doses of radiation exposure– but for trade/quarantine purposes which – while possibly beneficial to local environments - are ultimately aimed at increasing profit for food producers, not at benefitting the consumer.

Ultimately, however, “safety” of the process does not extinguish the public’s right to know about it or necessarily negate public concern. The public expects to be informed when a food has undergone processing and FSANZ has a responsibility to administer that. The current rules on irradiated food labelling should, therefore, be maintained and strengthened.

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

**Some sample responses:**

* We are aware that people expect the regulator to keep them accurately informed and for products using novel or structurally altering production practices to be labelled.
* We are aware that the industry, knowing that people have an aversion to irradiated food, see labelling as an impediment to their market.
* We call on the regulator to accept that peoples’ rejection of labelled irradiated food is a sign of a health free market in action. To remove labelling to trick people into purchasing something they would not normally buy is unacceptable.
* We believe that food producers who support irradiation should be willing to loudly promote their irradiated products through the mandatory labelling.
* In fact, all of Australia’s irradiation approvals have been premised on the assurance that irradiated products would be labelled. To remove labelling would be a gross deception to the public – who though perhaps divided on novel technologies demand and expect them to be labelled.
* Food producers who want to hide food processes they use are not acting in with the good of the community in mind and should not be supporting in this evasion by our food regulator.