**FAQs and Background to the issues**

**FAQs**

**What is food irradiation?**

Irradiation is the process of exposing food ionising irradiation to intentionally alter some characteristics of the produce to achieve extended shelf life and/or pest destruction.

Numerous scientific studies have exposed the harmful effects of food irradiation. Irradiation causes vitamin and amino acid depletion in food. It changes the molecular structure of food potentially forming toxic chemicals linked to: cancer, organ damage, genetic mutations, immune system disorders, tumors, stunted growth, reproductive problems and nutritional deficiencies.

(source: Public Citizen, Questioning Food Irradiation, April 2003, www.citizen.org/cmep)

Approved irradiation exposures for the processing of ‘fresh’ fruits and vegetables (tomatoes, capsicums, persimmons, mangoes, pawpaw, lychees, longan, rambutan, mangosteen, carambola, breadfruit, custard apples) is a minimum of 150Gy (equivalent to 1.5 million x-rays) and a maximum of 1KGy (equivalent to 10 million x-rays).

These doses are delivered by exposure to fuel rods containing Cobalt 60 from Canadian nuclear reactors. FSANZ acknowledges that irradiation changes the vitamin and nutritional content of food with the potential to create new chemical compounds within the food, which may not be naturally found. Ionising radiation by its nature changes the molecular structure of that which is exposed to it.

Irradiation is invisible to the consumer though food can be tested to see if it has been irradiated. The test for irradiation is the presence of radiolytic products and free radicals – showing clearly that irradiation causes compositional changes in food. FSANZ also confirms: "Irradiation potentially causes both macro and micronutrient changes in foods, depending on the irradiation dose, the food’s composition and environmental conditions.”

In Australia Irradiation approvals are given under Food Standard 1.5.3; irradiation is regulated as a food processing technique.

*“Even where this Standard permits irradiation, food should only be processed by irradiation where such processing fulfils a technological need or is necessary for a purpose associated with food safety.  Food should not be processed by irradiation as a substituted procedure for good manufacturing practices.”* [*http://www.comlaw.gov.au/Details/F2009C00895*](http://www.comlaw.gov.au/Details/F2009C00895)

**Why is irradiated food labelling being reviewed?**

The original call for a “review” of mandatory labelling of irradiated foods came from Labelling Logic: Review of Food Labelling Law and Policy (2011) aka the “Blewett Report”.

**False premise for Review:** Recommendation 34 “that the requirement for mandatory labelling of irradiated food be reviewed” was premised entirely upon the notion of long-term experience with irradiated foods. “People have not had 30 years’ experience of irradiated foods and there appear to be no problems for humans occasioned by the consumption of food treated with this technology.” (pg 94.)

Two major fallacies underlie this premise:

1. Irradiated food has only recently been introduced to Australian and New Zealand markets and there is little or no consumer experience with it.
2. The safety of irradiated food cannot be presumed simply by there “appear[ing] to be no problems.” In fact, no long term studies of consuming an irradiated diet have been conducted.

# What is the Review aiming to do?

# The “Review” process: Despite assertions that the consultation underway is not calling for legislative change, our understanding that is in really a litmus test for further action to remove labelling.

# Indications from officials and Ministerial letters suggest that the outcome of this process will likely be cessation of the present requirement to label irradiated fruits and vegetables and other irradiated foods . The review document itself suggests that as labelling is seen as an impediment to the “uptake of the technology.”

The removal of mandatory labelling of irradiated foods is also likely to be considered a litmus test for the removal or lack of labelling other novel foods- foods using new technology - such as GMOs or Nanotechnology.

# What about labelling in other countries?

# Labelling is the global norm: It is clear that labelling of irradiated food is the norm. In fact, international standards, our trading partners, and the countries listed as examples in the FSANZ discussion paper, tend to have more stringent labelling regimes than Australia. They call for mandatory labelling – and, unlike Australia, include prescribed words clearly indicating that the product has been irradiated.

**What’s being irradiated in Australia?**

So far, FSANZ has approved: herbs, herbal infusions, spices, tomatoes, capsicums, mangoes, pawpaws, mangosteens, carambolas, breadfruit, litchis, rambutans, longans, custard apples, apples, apricots, cherries, nectarines, peaches, plums, honey dews, rockmelons, strawberries, table grapes and zucchini and squash. An application for the irradiation of raspberries and blueberries is currently being processed.

Recent approvals for commonly eaten fruits and vegetables significantly increase the proportion of irradiated foods in the average Australian and New Zealand diet, increasing the need for strong labelling laws.

It is clear that the industry is keen to increase the amount of food it irradiates and sees labelling as standing in the way to consumer acceptance.

The removal of mandatory labelling of irradiated foods is also likely to be considered a litmus test for the removal or lack of labelling other novel foods- foods using new technology - such as GMOs or Nanotechnology.

We cannot allow the government/our food regulator to collude with industry to keep us in the dark re irradiated or other novel foods. We must demand that mandatory labelling remain - and, in fact, be improved.

**Is irradiation like microwaves?**

The webpage [**http://www.foodstandards.gov.au/consumer/foodtech/irradiation/Pages/default.aspx**](http://www.foodstandards.gov.au/consumer/foodtech/irradiation/Pages/default.aspx)opens stating that irradiation is used in over 50 countries, has been used since the 1950s, is an alternative to pesticides and heat treatment and is safe and effective.

**FSANZ: Dumbing-down science - telling half-truths – to promote irradiation:**

It then likens ionising radiation to microwaves and fails to discuss the source or strength of gamma radiation used, rather describing the process in vague and an inaccurate fashion: “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 a far cry from explaining to the public that, in fact, while the radiation exposure levels permitted vary according to the product and the purpose of the irradiation, fruits such as tomatoes and capsicums will be irradiated with anywhere from 150Gy to 1kGy, which is an equivalent to approximately 1.5million – 10,000,000 chest x-rays per exposure – calculated on the lower end of chest x-ray strength.

While there may be irradiation approvals in over 50 countries, the use of irradiation is not widespread, due to consumer resistance and availability of phytosanitary options.

Furthermore, despite irradiation technology being developed since the 1950s, claims of the safety of irradiated foods and “efficacy” of the process are unsubstantiated and unsubstansiatable – due to the fact that no long term consumption studies have been conducted.

**Can irradiation make food safer?**

**Irradiation proponents claim that irradiated food can be safer than non-irradiated food as irradiation can control or neutralise some food-borne pathogens.**

Irradiation can kill or control some food-borne pathogens and is used for “microbial decontamination” even in Australia and as a biosecurity measure with animal-based (non-food products). Irradiation, however, cannot be a substitute for clean production and handling practices and is not recommended for regular use to “clean up”

In Australia Irradiation approvals are given under Food Standard 1.5.3; irradiation is regulated as a food processing technique.

*“Even where this Standard permits irradiation, food should only be processed by irradiation where such processing fulfils a technological need or is necessary for a purpose associated with food safety.  Food should not be processed by irradiation as a substituted procedure for good manufacturing practices.”* [*http://www.comlaw.gov.au/Details/F2009C00895*](http://www.comlaw.gov.au/Details/F2009C00895)

End of production use of irradiation for “safety” purposes is not general supported in Australia.

* ***“****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).”*

*2014 Commonwealth Gamma irradiation as a treatment to address pathogens of animal biosecurity concern Final policy review​*

# http://www.agriculture.gov.au/biosecurity/risk-analysis/reviews/final-animal/gamma-irradiation

**Irradiation for “safety” purposes.** To date, all FSANZ fruit and vegetable irradiation approvals have been for phytosanitary control - that is quarantine purposes - not for “safety” purposes.  They have been approved for radiation exposure up to 1kGy.

Only herbs/spice/herbal infusions have been approved from microbial contamination. Irradiation for microbial contamination may be exposed up to30kGy.

The dosage approved for treatment of products not regulated as food (so could include animal feed, pet food etc) to address pathogens of animal biosecurity concern is 50kGy.

Food can only be legally irradiated for the purpose for which it has been approved. Irradiation for “safety” purposes – to control foodborne pathogens for example – tends to require higher doses of radiation exposure increasing risk of radiation induced nutritional depletion and the production of radiolytic products and other chemical changes.

To use food irradiation as a food safety measure would, therefore, require changes to the current approvals and further approvals to expose food to higher amounts of radiation. The higher the dosage, the greater the potential impact on food.

**Cat food irradiation now banned in Australia due to illness in cats:**

TheAnimal Biosecurity Branch of the Commonwealth Department of Agriculture confirms that: “In 2008-9, 87 cats in Australia were reported to have developed severe neurological disease (chronic leucoencephalomyelopathy) associated with eating an imported, irradiated dry pet food. The department … concluded that there was a reasonable body of evidence that gamma irradiation, applied as an adjunct quarantine treatment of pet food, was a contributing factor to the disease syndrome.”

Proponents of continuing the use of irradiation despite this, state that claim that the impact is species-specific AND that that cat food/pet food is irradiated at a higher dosage than food for human consumption.

**The irradiation of this cat food was a “food safety” measure; it was a food safety measure for cat food. Use of irradiation as a “food safety” measure for human food would most likely see the approved dosage increase – as is the case already for herbs and spices.**

A cause of great distress to the cat owners was the fact that laboratory research proving the potential for this impact existed but had been disregarded at the time by the parties involved. In its latest irradiation literature review, the European Food Safety Authority (ESFA) has not ruled out the potential significance to humans.

The irradiation of cat food is now prohibited in Australia and dog food requires irradiation labelling. To have lessor or no guidelines for labelling of foods for human consumption is incomprehensible and certainly deceptive to consumers who are aware of the cat and dog food situation.

**New science around allergenicity:**

A recent study shows that smaller irradiation dosages (~1 Gy) can render protein more allergenic than either non-irradiated protein, or protein irradiated at a higher dosage. This is an ignored but potential emerging food safety risk associated with irradiation*. Vaz, A.F., et al., Low-dose gamma irradiation of food protein increases its allergenicity in a chronic oral challenge. Food Chem Toxicol., 2012. 51C: p. 46-52-doi: 10.1016/j.fct.2012.09.011.*

**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.**

**10 Basic points eleaborated**

1. **Despite their appearance, irradiated fruits and vegetables are processed, not fresh.**

**Irradiated food is processed, not “fresh”:** The irradiation of fruits and vegetables typically involves their exposure to the energy equivalent of between 1.5 and 10 million x-rays. When used as a fruit fly larvae treatment, food irradiation also extends shelf life, sanitises, and alters the nutritional value of the treated foods. The substantial and significant changes made to fruits and vegetables as a result of processing with irradiation cannot be discerned with our ordinary senses. Furthermore, irradiation is used in conjunction, not as a substitute for chemicals used in food production, cold storage, cooking and other processing of food.

1. **As irradiation is invisible, without labelling, consumers will have no way to discern whether or not a product has been irradiated. Consumers will be misled into believing irradiated food is fresh or unprocessed.**

**Labelling is the only way to know:** As irradiation is invisible, labelling is the only wayto ensure that consumer rights are protected, producers of non-irradiated products are not disadvantaged by having their products indistinguishable from irradiated products (or are not forced to label “non-irradiated” or “fresh” to ensure the distinction) and that true market forces are allowed to prevail through consumers being empowered to make fully-informed decisions about what they purchase.

Marketing irradiated fruits and vegetables as fresh would grossly mislead the public and be a failure of duty of care to Australian and New Zealand consumers.

1. **Consumers have strong opinions on irradiated produce and expect it 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 report also noted that 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). “ (p 14-15)

The public wants irradiated food to be labelled.

**Precedence and presumption of labelling:** 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.

Labelling is correctly listed by Food Standards Australia New Zealand as the only method by which consumers will know if food has been irradiated:

## “How can I tell if food has been irradiated?

A food that has been irradiated, or food that contains irradiated ingredients or components, must be labelled with a statement that the food, ingredients or components have been treated with ionising radiation.

If the food is not normally required to be labelled, then the mandatory labelling statement must be displayed close to the food. This would apply to foods such as:

* whole fruit and vegetables sold loose by supermarkets
* a take away pizza with an irradiated herb as an ingredient.

The radura symbol (below) may be used in addition to the mandatory labelling.”

*http://www.foodstandards.gov.au/consumer/foodtech/irradiation/Pages/default.aspx*

Labelling is the status quo and expected. To remove labelling is to deny the public any access to informed choice and is unconscionable.

1. **Irradiation is still a new technology with a limited history of safe use in the human food supply.**

**Australian and New Zealand have little experience with irradiated foods:** Irradiated foods have not been in the Australian food chain for 30 years. In fact the first approval, for herbs and spices, was in 2001 and the list has only recently been extended to include commonly eaten foods such as tomatoes and grapes.

Outside of a few trials, very little irradiated food has been marketed in Australia. New Zealand has received some irradiated produce from Australia, though this is still in niche markets and has not been broadly experienced. The issue of irradiation and labelling, however, have been newsworthy in New Zealand as irradiated Australian produce has the potential to be competition for locally grown non-irradiated items.

Overall, Australians and New Zealanders are unaware of the process of irradiation, and when made aware express concern. It is also clear that Australians and New Zealanders expect products produced using “new” technologies to be labelled. Irradiation is new to most of the public.

It must be noted, however, that in the 1980s, Australian opposition to food irradiation was so strong and publicly acknowledged that a 10- year moratorium was placed on the process in 1989. In 1999, with little public awareness, the moratorium was lifted with plans to construct Australia’s first specifically food- related irradiation facility soon revealed. This facility, at Narangba/Deception Bay – 25 minutes north of Brisbane, is now operating, irradiating food and other commercial items.

**Safety cannot be presumed:** While our main objective here is to ensure that the public have access to information and choice via accurate information, we must point out that the notion of “safety” is a marketing tool, rather than as a fact.

**“Safety” is unsubstantiated**. Indeed, FSANZ’s own literature points to the lack of quantified research in to consumption patterns. In a 2014, report FSANZ stated:

*"The USA is the second greatest user of food irradiation by volume after China. No consumption data are available, but the amounts sold into the retail trade are known approximately. As the foods have been retailed for several years in a few thousand retail outlets (Eustace & Bruhn 2006), it may be presumed that retailers are actually selling most of the product." (SD1 page3)*

It is farcical to state that irradiation is safe – or has been proven safe – when no data of consumption patterns is available. Safety cannot be "presumed." With "no consumption data available" a scientific statement as to the safe consumption -let alone the safe consumption for over 30 years - is unprovable - and unacceptable. It is a marketing tool, not a scientific fact – and should not used as a premise for assessment of irradiation applications or as a rationale for removing labelling.

**Cat food irradiation banned in Australia after cats developed neurological disorder:**

TheAnimal Biosecurity Branch of the Commonwealth Department of Agriculture confirms that: “In 2008-9, 87 cats in Australia were reported to have developed severe neurological disease (chronic leucoencephalomyelopathy) associated with eating an imported, irradiated dry pet food. … The department … concluded that there was a reasonable body of evidence that gamma irradiation, applied as an adjunct quarantine treatment of pet food, was a contributing factor to the disease syndrome. A cause of great distress to the cat owners was the fact that laboratory research proving the potential for this impact existed but had been disregarded at the time by the parties involved. In its latest irradiation literature review, the European Food Safety Authority (ESFA) has not ruled out the potential significance to humans.

The irradiation of cat food is now prohibited in Australia and dog food requires irradiation labelling. To have lessor or no guidelines for labelling of foods for human consumption is incomprehensible and certainly deceptive to consumers who are aware of the cat and dog food situation.

**Recent science around allerginicity:**

A recent study shows that smaller irradiation dosages (~1 Gy) can render protein more allergenic than either non-irradiated protein, or protein irradiated at a higher dosage. This is an ignored but potential emerging food safety risk associated with irradiation*. Vaz, A.F., et al., Low-dose gamma irradiation of food protein increases its allergenicity in a chronic oral challenge. Food Chem Toxicol., 2012. 51C: p. 46-52-doi: 10.1016/j.fct.2012.09.011.*

With limited history in our diet, and no long-term studies conducted, the potential impact of consuming irradiated food cannot be accurately assessed. 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.

**Removal of labelling will disadvantage non-irradiating producers and people who choose to eat irradiation-free.**

Producers of non-irradiated foods should not have to bear the potential costs of differentiating themselves from irradiated foods, or the potential loss of market due to consumer inability to distinguish irradiated food from non. Irradiation labelling should be improved to include the labelling of individual fruit and vegetables.

New Zealand has a substantial tomato industry – Australia primarily filling an off-season gap. New Zealand tomato growers are keen to ensure that New Zealand consumers can differentiate between irradiated Australian and non-irradiated local tomatoes.

The Tomatoes NZ chairman Alasdair MacLeod stated "We are demanding compulsory labelling on all irradiated produce, loose or otherwise, be clear and enforced, so that Kiwi consumers can make an informed decision between Australian irradiated tomatoes and New Zealand tomatoes." [*http://www.stuff.co.nz/business/farming/cropping/8618860/Fears-over-treated-Aussie-tomatoes*](http://www.stuff.co.nz/business/farming/cropping/8618860/Fears-over-treated-Aussie-tomatoes) *Fears over treated Aussie tomatoes NICOLE PRYOR 01/05/2013*

Furthermore, labelling is correctly listed by Food Standards Australia New Zealand as the only method by which consumers will know if food has been irradiated:

## “How can I tell if food has been irradiated?

A food that has been irradiated, or food that contains irradiated ingredients or components, must be labelled with a statement that the food, ingredients or components have been treated with ionising radiation.

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* whole fruit and vegetables sold loose by supermarkets
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The radura symbol (below) may be used in addition to the mandatory labelling.”

*http://www.foodstandards.gov.au/consumer/foodtech/irradiation/Pages/default.aspx*

So far, 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 is to deny the public any access to informed choice and is unconscionable.

**FSANZ and food producers are aware of consumer resistance to 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>

In its review document, FSANZ and the Ministerial Council clearly link labelling to the low “uptake” of irradiation foods. (p 5). They also know that people want irradiation food to be labelled – see #3 above.

***We ask: Should labelling be removed so that people will buy irradiated food?***

**Removing labelling to boost sales of irradiated food would be deceitful.**

In its review document, FSANZ and the Ministerial Council clearly link labelling to the low “uptake” of irradiation foods. (p 5). They also know that people want irradiation food to be labelled – see #3 above.

**Removing labelling would be misleading:** Labelling is vital and that removal of labels and signage from irradiated fruits and vegetables would create circumstances in which Australian and New Zealand consumers would be led to the false, misleading and deceptive conclusion that irradiated fruits and vegetables are fresh produce.

***We ask: Should labelling be removed so that people will buy irradiated food?***

**Australian & New Zealand labelling requirements already fall short of global standards.**

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.

In its 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)

***We ask: If labelling is the norm and no-one else is considering getting rid of it, why is there a push to do so in Australia and New Zealand?***

**Labelling requirements should be strengthened to meet global standards & address community concern. At a minimum, labelling should include prescribed words: “irradiated” or “treated with irradiation”**

**Australia and New Zealand’s failure to meet global labelling standards:**

Labelling of irradiated food is the norm with our English speaking trading partners and clearly called for in global standards as set by the international Codex Alimentarius. Non-conformity with international standards would betray Australian and New Zealand consumers belief that their regulatory system is world class and reflects their needs and concerns. As it is, FSANZ’s lack of a precise, mandatory labelling regime for irradiated foods fails the public and is unprecedented amongst other English-speaking nations, USA, UK and Canada, and our trading partners.

The current labelling regulations do not:

* prescribe mandatory labelling statements,
* ensure individual labelling of irradiated products;
* or require products such as pet food and animal feed to be labelled.

If FSANZ is to live up to its mandate to provide accurate information to ensure public choice, Australia and New Zealand must improve labelling in accordance with global standards requiring at a minimum, the prescribed words:

* irradiated (name of the food),
* treated with radiation,
* or treated by irradiation

Without these improvements, there is still potential for producers to put forward misleading and deceptive claims.

**FSANZ should not be considering regulatory changes to intentionally decrease public awareness about an issue.**

The recently released FSANZ policy guideline “recognises that labelling on foods produced or processed using a new technology can be an issue of consumer interest” though not necessarily a health or safety issue. Australians and New Zealanders have clearly demonstrated concern about irradiation.

Without labels on irradiated foods, the public would be led to conclude that such foods were fresh and not irradiated. The removal of the mandatory labelling and signage requirements from irradiated fruits and vegetables would create a set of false, misleading and deceptive circumstances for consumers in Australia and New Zealand.

Labelling is the only way to ensure that consumer rights are protected, producers of non-irradiated products are not disadvantaged by having their products indistinguishable from irradiated products (or are not forced to label “non-irradiated” or “fresh” to ensure the distinction.

Australian and New Zealand labelling standards are already weaker than our trading counterparts and world standards. Rather than being removed, labelling should be improved to prescribe clear and accurate statements such as: “Irradiated – “ or “Treated with irradiation.”

In a free market economy, the demand for irradiated products should be driven by consumers making informed and intentional decisions to purchase such products. 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.

With Australia and New Zealand set to dramatically increase 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.

*Food regulations Ministerial Council – Complete address list*

*Food regulations must pass through the Ministerial Council before becoming law. Each state has at least one STATE MP on the Council. Let the ministers and decision makers know how you feel about irradiation labeling to help make a decision in favour of shoppers’ rights.* ***Please send your message to your state or territory’s members as well as federal reps****.*

Membership of the Australia and New Zealand Ministerial Forum on Food Regulation (the Forum) Membership of the Forum comprises a Minister from New Zealand and Health Ministers from Australian States and Territories, the Australian Government, as well as other Ministers from related portfolios (Primary Industries, Consumer Affairs etc) where these have been nominated by their jurisdictions. This ensures a whole-of-food chain approach to food regulation.

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