Who wants to keep Aussies in the dark about food irradiation?

"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***

Over the last two years Food Standards Australia New Zealand (FSANZ) has supported a push to significantly expand the list of foods permitted to be irradiated in Australia and New Zealand. At the same time, aware of consumer resistance to purchasing "fresh" food exposed to the equivalent of at least 1.5 million x-rays, irradiation proponents have been embarking on a cynical marketing strategy to reduce our reluctance: ***the removal of mandatory labelling requirements.***

FSANZ is now undertaking a "review" of mandatory labelling requirements for irradiated food Irradiation labelling 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.

The words are telling. Labelling has been identified as an impediment to "uptake" of food irradiation, a process unfamiliar to most Australians and New Zealanders, which the government deems to be safe. Safe – or not – global standards require irradiated food to be labelled.

In fact, removing labelling would make Australia the odd-ball amongst its trading partners – and possibly increase costs for food producers who need to ensure 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)

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?

The irradiation of fruits and vegetables typically involves their exposure to the energy equivalent of between 1.5 and 10 million x-rays. Now promoted as a fruit fly "treatment", food irradiation also extends shelf life, sanitises, and alters the nutritional value of the treated foods. The changes made cannot be discerned with our ordinary senses.

At best, scientific opinion around irradiation remains divided. 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)*

There is no data to support the claim that irradiated food is safe as no long term studies of human consumption of irradiated food have been carried out. In fact a recent document produced by FSANZ in support of irradiating 12 fruits states clearly that "consumption data are not available." *(FSANZ A1092: SD1 page3)* With "no consumption data available" a statement as to the safe consumption is insubstantial.

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.

The fact is also that most Australians and New Zealanders have little experience with irradiated food as little has been put on the market. Australian consumer acceptance cannot be assumed, while their resistance to the technology is well documented.

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

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

'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)

The public wants irradiated food to be labelled. To date, all irradiation approvals have been premised on the statement that irradiated foods would be labelled.

Industry sees the use of irradiation as a fruit fly control and shelf-life extender – meaning potential means to market access. And industry understands that people have an aversion to food exposed to radiation.

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. (p5).

Should labelling be removed to help the irradiation industry?

Australian and New Zealand labelling standards already fall short of 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 increasing 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.

Take action! The public comment period on FSANZ's labelling review "consultation paper" has ended. Each state and territory has representatives on the Ministerial Council who have the power to determine what happens next. Let them know that you care!

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