



AUSTRALIAN
**FOOD &
GROCERY**
COUNCIL

AFGC SUBMISSION

**LABELLING REVIEW RECOMMENDATION 34:
REVIEW OF MANDATORY LABELLING OF
IRRADIATED FOOD**

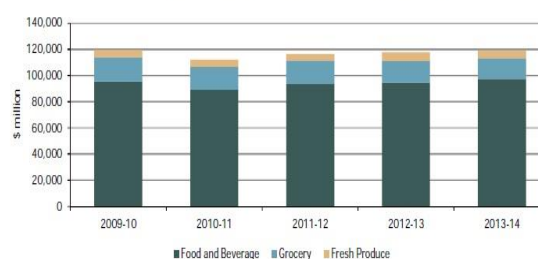
Sustaining Australia

PREFACE

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 190 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

Figure 3.1: Composition of the defined industry's turnover (\$2013-14)¹¹



Source: Based on ABS, catalogue number 8221.0, 8159.0 and 8155.0

Australia's food and grocery manufacturing industry takes raw materials and farm products and turns them into foods and other products that every Australian uses every day. With an annual turnover in the 2013-14 financial year of \$118 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity. It adds over \$32 billion to the value of the products it transforms.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector is Australia's largest manufacturing industry. The diverse and sustainable industry is made up of over 26,651 businesses and represents 30% (almost one third) of the total manufacturing industry in Australia.

The food and grocery sector accounts for over \$61.7 billion of the nation's international trade in 2014-15, with a trade surplus worth over \$10 billion to the Australian economy in 2014-15. These businesses range from some of the largest globally significant multinational companies to family-based small and medium enterprises.

The food and grocery manufacturing sector employs more than 322,900 Australians, paying around \$16.1 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with over 40% of the total persons employed being in rural and regional Australia. It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

The contribution of the food and grocery sector to the economic and social well-being of Australia cannot be overstated. Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

Data source: AFGC and EY State of the Industry 2015: Essential Information: Facts and Figures

AFGC SUBMISSION

The AFGC provides this submission in relation to the FSANZ Consultation Paper of 18 January 2016, “*Labelling Review Recommendation 34: Review of mandatory labelling of irradiated food*”.

The Consultation Paper properly sets out the background to this consultation in sections 1 to 3, but some of this discussion is worth highlighting.

*“In relation to recommendation 34, the Forum commented that **there is a significant body of evidence** demonstrating that food processed using irradiation is **both safe and nutritionally adequate**. It said that **irradiation provides significant benefits for consumers** in terms of **improved food safety and quality**. Irradiation is also considered to be **a cost-effective approach to managing biosecurity threats and preventing spoilage of fresh produce**. The Forum noted the uptake of irradiation in Australia and New Zealand, and therefore the realisation of these benefits, was low.” (emphasis added)*

The AFGC considers this summary to be accurate. The slow uptake of this safe, cost-effective food safety measure is a salutary example of the regulatory reality that impeding innovation can have adverse social consequences.

*Food irradiation is often **perceived** as a high-risk, low benefit technology (Sparks and Shepherd 1994; Frewer et al. 1997; Cardello et al. 2007; Henson et al. 2007). This is not unexpected given the characteristics of food irradiation where the technology may not be voluntarily chosen by the consumer, is not under their control and is unobservable, and where there is **a perception of uncertainty** surrounding the science. Additionally, benefits may not accrue to the consumer, but rather to others such as producers, exporters and the environment (Frewer et al. 1997; Cox et al. 2010). However, increased choice, quality and shelf life of produce and potentially lower prices are consumer benefits.*

These perceptions, of course, run counter to scientific evidence, as reflected in a further quote from the Consultation Paper -

Research has shown that food irradiation is safe and effective. The process has been examined thoroughly by the World Health Organization (WHO 1994; 1999); the European Community Scientific Committee for Food (SCF 1986); the United States Food and Drug Administration (USFDA, 1986) and by scientists at FSANZ in 2001, 2003, 2011, 2013, and 2014, respectively.

The Consultation Paper states -

Some industry stakeholders point out that food that undergoes alternative treatments, such as pasteurisation and chemical disinfestation of pests, is not subject to similar labelling. In their view, labelling unfairly singles out irradiation as a treatment. That is, it is an example of where consumers are informed of one treatment (irradiation), but not informed about other types of treatments, such as pre- and post-harvest chemical treatments (e.g. crop insecticides, methyl bromide).

These industry stakeholders believe this situation is preventing consumers from making truly informed choices about food.

The AFGC notes these concerns favour the use of alternatives to irradiation as a better commercial option, as the alternatives carry no consumer labelling requirements.

Gamble (2002) found that the types of concerns identified by Australians and New Zealanders included: exposure to radiation; reduction in nutrition and wholesomeness of foods; damage to the environment and occupational health for workers; and the use of irradiation as a substitute for safe food production.

The issues raised in Gamble's paper, as noted in the quote from the Ministerial Forum above, illustrate the reality that there is consumer misunderstanding of the irradiation process. FSANZ needs to consider in particular the point that -

*The word 'irradiation' was deemed almost synonymous with 'radiation'. 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.*

The AFGC endorses that consumers are entitled to access information about the nature and characteristics of, and the processes applied to, the food they consume. The AFGC supports consideration of how this information is conveyed in the context of improved information technology and mass mobile data that empowers consumers to search the information that is important to them.

AFGC PROPOSALS

The AFGC –

- (1) **Supports FSANZ** in undertaking a review of the regulation of food irradiation;
 - (2) Considers **a proposal should be instigated** to progress such a review;
 - (3) Recommends, in relation to the current requirements to gain pre-market approvals for irradiation, that a more **risk-based approach** be implemented that recognises the inherent safety of the process when used according to good practice, which recognises comparable economy approvals and which reserves pre-market assessment by FSANZ for novel or extreme uses of irradiation as a sterilization process; and
 - (4) In relation to current requirements for labelling, that FSANZ recognise that current labelling requirements are 'alarming and off-putting', promote confusion and inappropriately single out irradiation as a sterilisation process, and therefore –
 - a. Consider how best to identify this processing in a way that does **not undermine consumer confidence in the safety of the product**; and
 - b. Consider whether manufacturers should have the option of **providing information to consumers through extended information channels** other than product labels.
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