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29th March 2016

**Submission to Food Standards Australia New Zealand on:
Labelling Review Recommendation 34: Review of mandatory labelling of irradiated Food,
18th January 2016**

Tomatoes New Zealand, along with Horticulture New Zealand and Vegetables New Zealand Inc. welcome the opportunity to provide a submission to Food Standards Australia New Zealand on the Labelling Review 34: Review of mandatory labelling of irradiated food.

We recognise that, as stated at the beginning of the consultation paper for this review, FSANZ has been asked by the (now known as) Australia and New Zealand Ministerial Forum on Food Regulation to “*review 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*”, and this consultation is part of the seeking stakeholder views and any relevant information.

Tomatoes New Zealand is the national organisation representing New Zealand’s 150 fresh tomato growers, almost all of whom grow in greenhouses. The New Zealand fresh tomato industry has an annual domestic sales value of \$150m, including \$9m in exports, and employs 1,000 full-time equivalent staff.

Vegetables NZ Inc. is the national organisation representing 950 fresh vegetable growers (total gate sale value \$340m), including 38 fresh capsicum growers who produce domestic sales of \$20 million and export sales of \$35 million and employ 500 FTE staff.

Fresh tomatoes and capsicums are supplied to New Zealand domestic and export markets year-round including winter, with a peak production season of October to April.

Horticulture New Zealand (HortNZ) represents the interests of all of New Zealand’s 5,600 commercial fruit and vegetable growers (including tomato and capsicum growers). The horticulture industry is valued at over \$6 billion annually to the New Zealand economy, including \$2.5 billion of exports, and employs 50,000 staff.

BACKGROUND

TomatoesNZ first expressed its views on the necessity of labelling irradiated produce to the New Zealand Minister of Food Standards the Honourable Nikki Kaye in 2013, the year that irradiated tomatoes were approved (August) and started arriving in New Zealand.

On 1 May 2013 the Minister appeared on TV3's 6pm news and stated that food labelling is important to ensure consumers can make an informed choice between irradiated and non-irradiated produce and that she would be putting adequate measures in place to achieve that.

On the 6th May TomatoesNZ wrote to the minister supporting those comments and to say that we were very concerned that unless clear labelling is in place, consumers who are concerned about irradiation will stop buying all tomatoes, including New Zealand tomatoes, and that we wanted to see strict labelling requirements for loose irradiated product so that any impact on local, non-irradiated product was minimised.

On the 13th of May 2013, TomatoesNZ met with the Minister to discuss our concerns. In a follow-up letter, the Minister confirmed that the Ministry of Primary Industries (MPI) was developing guidance for retailers on meeting the labelling requirements. She added that she understood our concerns about public perception and the potential impacts on New Zealand producers.

We then worked with MPI to develop information for wholesalers, retailers and food service providers; however we were not satisfied with the quality of the information MPI provided, and the fact that the Ministry would only respond to complaints of mislabelling, and would not proactively enforce the requirement. We expressed this in a letter to the Minister on 1 July 2013, and provided a list of recommendations (Appendix A) on what information we believed should be provided to wholesalers, retailers and food businesses.

The Hon. Nikki Kaye responded that an "implementation plan" had been developed by MPI with the objectives of ensuring that the rules are being followed; that checks occur; and that there are consequences if the rules are not followed.

We would be happy to provide copies of the correspondence described above, on request.

Despite the commitment to an implementation plan, action by MPI during the 2013/14 season for tomato imports (October- March) was minimal, and TomatoesNZ felt the need during July 2014 to undertake its own awareness-raising campaign among those selling irradiated tomatoes. TomatoesNZ tried to raise awareness and compliance with the labelling regulations by providing information directly to wholesalers and to food service providers (Appendix B), and later through articles and advertisements in their industry magazines (May-July 2015).

In October 2015 TomatoesNZ, Vegetables NZ and Horticulture NZ were invited to a meeting in Wellington to discuss our views on retaining the irradiated food labelling requirement with FSANZ staff from NZ and Australia.

We are disappointed that while the views of Australian industry were extensively explained in the consultation document, our views were completely ignored.

Additionally, the 2015 Curia Market Research consumer poll on irradiation labelling commissioned by TomatoesNZ, which is the only consumer research presented in the consultation document that was local, independent, and conducted since irradiated tomatoes have been available in NZ and Australia, was only briefly mentioned (page 14). The survey was dismissed as not having asked views on other types of treatments, or considering other factors such as price or taste.

In our view, consumers are unlikely to change their views on the need for labelling just because a product is a different price or taste, and we are not sure what asking about other treatments would have added to the current discussion on irradiation. It is not FSANZ's role to consider the impact of price and taste, but only the protection of public health and safety and **provision of adequate information and prevention of misleading or deceptive conduct.**

We were also disappointed that although in the "scope" of the consultation document FSANZ admit that their knowledge of current consumer understanding of irradiation is limited, but **no further work is being proposed to discover consumers' understanding and views.**

The review appears to place the considerations and concerns of Australian industry above those of the consumer and New Zealand industry. Doing so is outside of the role and primary objectives of FSANZ, and to the detriment of NZ industry. It is not FSANZ's role to assess or assist the market for irradiated food, but to only ensure safety and public access to information.

GENERAL COMMENTS ON THE REVIEW

We agree with irradiation (along with field controls) as an effective means for managing the biosecurity risk of fruit flies entering New Zealand on fresh produce; this is the purpose that irradiation is applied for fresh produce entering New Zealand from Australia.

However we believe that;

- i. Consumers WANT labelling of irradiated foods, and it is FSANZ's role to ensure labelling is provided;
- ii. The evidence that removing labelling and increasing communication on the safety and benefits of irradiation will increase consumer acceptance is not strong;

- iii. Removing the labelling requirement will place NZ and Australia out of step with the rest of the world;
- iv. Increased enforcement and awareness of the labelling requirement is needed.

These views are outlined in more detail below.

i. **Consumers WANT labelling of irradiated foods**

The 2015 Curia Market Research consumer survey commissioned by TomatoesNZ (Appendix C), the only piece of recent and local and therefore directly relevant independent consumer research identified as available by FSANZ in the consultation document shows that there is **overwhelming consumer support for continued labelling of irradiated produce.**

Other consumer research presented in the consultation document was conducted in the year that the approval for irradiated foods was given in Australia and New Zealand (October 2001), and was reported to show low consumer awareness and misunderstanding of food irradiation labelling – hardly surprising when it was so new.

A second survey was conducted in 2007 – before the approval for tomatoes and capsicums, which are consumed more frequently and in larger quantities, both in the home and in pre-prepared meals, than the foods approved at the time of that survey (such as mangoes and herbs and spices). So although only 11-13% of respondents in that survey nominated irradiation as an area of concern without prompting (at a high level of over 5.7 out of a maximum concern rating of 7.0), it could have simply represented low overall awareness that irradiation was being used as a food treatment.

Consumers cannot differentiate between irradiated and non-irradiated produce without the labelling. We are concerned that consumers will not understand or realise that almost all of the tomatoes, and all of the capsicums available on the New Zealand market (year-round) are produced in New Zealand, and are NOT irradiated. Removing the need to label irradiated product means there is no differentiation between irradiated and non-irradiated product, and we are concerned that this will impact sales of the New Zealand produce, and the category overall.

Fresh tomatoes are New Zealand's second biggest selling vegetable, just behind potatoes in the 2013 New Zealand Household Economic Survey (Statistics NZ), and as such are a major component of New Zealander's diets.

It is important to retain and enforce the labelling requirements, so that consumer trust and confidence is retained. Changing the labelling requirements now would also add to

consumer confusion and confidence in the products including tomatoes and capsicums, that have been approved for treatment with irradiation.

We understand that there is no Australian interstate trade in fresh produce that has been irradiated. We understand that this is because Australian retailers consider that there is consumer resistance to irradiated produce, so they do not want to be seen to be selling it. The largest New Zealand retailers have not been stocking irradiated tomatoes to date, and anecdotally we hear that this is because they also believe that there is considerable consumer resistance to irradiated tomatoes and capsicums.

ii. **The evidence that removing labelling and increasing communication on the safety and benefits of irradiation will increase consumer acceptance is not strong**

The consultation document for this review puts the consumer's desire for labelling down to concerns about the safety and integrity of irradiated food, arguing that the concern is usually due to a lack of understanding about, and exposure to, irradiated food.

The document states under section 4.4 that *"There is a body of evidence to suggest that consumer acceptance of food irradiation improves when information is provided about the technology and its benefits"* and refers to several studies to justify that statement.

The Rodriguez (2007) study referred to showed no significant improvement in propensity to see irradiated food as safe and show less concern about it after they were provided with two sets of information about irradiation – one favourable and one not. The authors of the study concluded that the key to gaining acceptance of complex food technologies [such as irradiation] is earning trust, not simply presenting scientific information.

One of FSANZ's own reports: *Supporting document 1: Food irradiation in Australia, New Zealand and other countries – Application A1069, Irradiation of tomatoes & capsicums* - reported (in Appendix 1) the following results from two of those studies (bold emphasis has been added):

*"Bruhn (1986) in an early study explored the effects of an education pamphlet and posters on attitude toward food irradiation. Bruhn found the provision of information increased reported willingness to buy irradiated foods, even though they retained concerns about the technology. **However in the case of consumers who were strongly opposed to food irradiation the information did not affect any change.**"*

Therefore we do not believe that FSANZ has provided sufficient evidence that "there is a body of evidence to support increased consumer acceptance if more information is provided to them", in the absence of mandatory labelling. If the key to acceptance is trust,

then labelling must form an integral part of building trust and acceptance, and labelling should be retained.

iii. **Removing the labelling requirement will place NZ and Australia out of step with the world**

According to the table in “*Attachment c: Codex specifications and international requirements for food irradiation labelling for food, and worldwide permissions for food irradiation*” of the consultation review document, if labelling is removed, New Zealand and Australia would be out of step with CODEX and with all of the countries listed as having permissions for irradiated foods. Those countries all require that all irradiated whole foods are labelled as such.

Additionally, all require pre-packaged foods that contain an irradiated ingredient to be labelled (the only exception being Canada if the irradiated ingredient constitutes less than 10% of the pre-packaged product). Therefore if the labelling were removed, we would NOT be in line with international standards.

iv. **Increased awareness and enforcement of labelling requirement is needed.**

A survey of small independent retailers by TomatoesNZ in 2015 found that more than a third of those stocking Australian tomatoes were not aware of the requirement to label them as irradiated.

This was despite TomatoesNZ 's attempts to address a lack of retailer awareness in 2014 by providing information for retailers (Appendix B) and catering & hospitality, , and MPI also publishing and distributing information on the requirements to importers and retailers in 2013, after prompting from our industries.

The survey of stores across 23 Auckland suburbs, carried out in April 2015 (Appendix D), found that just over half buy Australian tomatoes. Of these, 81 % knew all Australian tomatoes are irradiated but only 62 per cent said they were aware of labelling requirements. However, out of 26 retailers who said they stocked irradiated Australian tomatoes, only six were able to correctly say without prompting that they must be labelled as irradiated, and 50% said they did not know where to go to get information on the labelling requirements.

These retailer survey results showed that it is difficult to get the message through. Retailers are busy, particularly smaller owner-operated stores who have a myriad of requirements they must meet

We would like to see the labelling **requirements strengthened to include individual labelling of irradiated products**. This would place the onus for labelling with the producer and importer, rather than relying on retailers to convey the message.

New Zealand tomato exporters confirm that if they were ever to use irradiation as a treatment, they would be happy to comply with individual fruit labelling for loose tomatoes or labelling on the packages of pre-packs should it be required, since the cost and inconvenience of applying such labelling is negligible.

We would also like to see greater proactive enforcement of the labelling requirements, rather than the Ministry for Primary Industries simply relying on complaints of non-compliance.

QUESTIONS

Questions for All submitters

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?

In April 2015, Tomatoes New Zealand commissioned a survey to gauge consumer views on whether fresh produce, pre-packaged food, or pre-prepared meals that has been irradiated or contained irradiated ingredients, should be labelled. The survey report is contained in Appendix C of this submission.

The survey found that **85%** of participants wanted irradiated fruit and vegetables to be clearly labelled as irradiated. And, **78%** want to know if food they order at a restaurant, café or takeaway includes irradiated produce.

This shows that there is **overwhelming** support for continued labelling of irradiated produce.

Slightly more women than men wanted to see irradiation labelling in stores and food outlets but there was no major differences across different age groups or locations.

A thousand respondents participated in the poll, taken from a random selection of 15,000 nationwide phone numbers. The results were weighted to reflect the overall adult population in terms of gender, age and area. Based on this sample of 1,000 respondents, the maximum sampling error (for a result of 50 per cent) is +/- 3.2 per cent, at the 95 per cent confidence level.

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

- if yes, then why?

- if no, then why not?

Not applicable.

However, we believe there is considerable consumer resistance to irradiated food, and that if consumers are unable to make an informed choice (via adequate labelling), then this will impact the market for NZ produce that is not irradiated.

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?

TomatoesNZ believes that the current labelling requirement provides enough information for consumers to make an informed decision, as long as the labelling requirements are being met by retailers.

As described above, many retailers struggle with understanding the requirements, and this could be overcome by requiring individual labelling of irradiated loose fresh produce.

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

We are comfortable with the wording not being prescribed, as long as the need for it to be a “statement to the effect that the food has been treated with ionising radiation” is retained, along with the examples of wording that can be used.

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

The symbol is not necessary, and we suspect not widely recognised or understood as representing treatment with irradiation. We would prefer to retain the use of wording, without the symbol.

If the symbol is used, it should have to be accompanied by a statement as per the current statement requirements.

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.

The TomatoesNZ consumer poll clearly shows that this is not what NZ consumers want.

Removing the labelling will impact on the market for non-irradiated produce, as consumers will not feel assured that they can choose product that is not irradiated.

Additionally, as described above, there is no strong evidence that simply communicating the benefits of irradiation to consumers means that they will accept the treatment. Building trust is more important, and trust requires transparency, which labelling provides.

Removing the labelling requirement will also result in NZ and Australia being out of step with the rest of the world.

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

Yes, because again, the TomatoesNZ consumer survey clearly showed that this is what consumers want.

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

Yes, again because the TomatoesNZ consumer survey clearly showed that consumers want to know if their food is irradiated.

Questions for Produce growers

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

No. There is no commercial irradiation treatment plant in New Zealand.

There is also no current demand from New Zealand growers to irradiate their produce, as they have no phytosanitary or food safety issues that would require such treatment.

Additionally, irradiation does not fit with the brand image that New Zealand producers currently wish to project.

New Zealand tomato exporters confirm that if they were ever to use irradiation as a treatment, they would be happy to comply with individual fruit labelling for loose tomatoes or labelling on the packages of pre-packs should it be required, since the cost and inconvenience of applying such labelling is negligible.

Questions for Food Manufacturers

10. – 13. Not applicable.

Questions for Food Service Providers

14. - 15. Not applicable

Questions for 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?

Yes, the TomatoesNZ poll of 1,000 NZ consumers, which is presented in Appendix **C**.

The polls script and results were as follows:

We have some questions on irradiated food. Some foodstuffs are irradiated to help preserve the food and eradicate bacteria and pests. This involves exposing the food to ionising radiation from x-rays or gamma rays. The rays pass through the food like microwaves in a microwave oven, but the food does not heat up to any significant extent.

Would you like fruit and vegetables that you buy that have been treated with irradiation to be clearly labelled as irradiated?

85% said that they would.

If a dish you order in a restaurant, café or takeaways includes fruit or vegetables that has been irradiated, would you like to know that the dish includes irradiated food?

78% said they would.

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

No, because:

1. We don't use irradiation in NZ
2. Other markets all require irradiated food to be labelled (as per "Attachment C" of the consultation document)

It seems to us that the only reason for the labelling requirement being an impediment to developing markets would be because of consumer resistance to irradiation. Therefore removing the labelling requirement would be deceptive, and against FSANZ's statutory role in "The provision of adequate information relating to food to enable consumers to make informed choices".

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).

New Zealand producers/packers report that the costs mandatory of labelling are negligible. They already provide many other types of labelling and product information to wholesalers, so adding irradiation labelling (in the event they ever did irradiate) would not be an issue.

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).

TomatoesNZ are concerned that consumers will not understand or realise that almost all of the tomatoes available on the New Zealand market are produced in New Zealand, and are not irradiated.

Removing the need to label irradiated product means there is no differentiation between irradiated and non-irradiated product, and we are concerned that this will impact sales of New Zealand tomatoes, as consumers will not be able to tell the difference between irradiated and non-irradiated tomatoes.

Tomatoes New Zealand would prefer to see a requirement for individual labelling of irradiated loose produce, to ensure that there is no confusion in consumers' minds about what is, and what isn't irradiated. This would also remove the labelling onus and cost from the retailer and place it with the grower/packer/exporter, where it should be.

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?).

Not applicable

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?

Not applicable

Questions for all submitters

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

We are comfortable with the safety and benefits of irradiation being included on labels.

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

We believe that even if other methods are used, mandatory labelling should be retained, so that consumers can differentiate irradiated from non-irradiated product, and because maintaining consumer trust is crucial.

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

No.

REFERENCES

Bruhn CM, Sommer R, Schutz HG (1986) Effect of an educational pamphlet and posters on attitude toward food irradiation. *Journal of Industrial Irradiation Technology*. 4:1-20

Food Standards Australia New Zealand: Supporting document 1 Food irradiation in Australia, New Zealand and other countries – Application A1069 Irradiation of Tomatoes & Capsicums

Rodriguez L (2007) The impact of risk communication on the acceptance of irradiated food. *Science Communication* 28:476

Rimel A, McWatters KH, Hashim IB, Fletcher SM (2004) Intended vs. actual purchase behavior for irradiated beef. *Journal of Food Products Marketing*. 10:4:1-15

APPENDICES

- A. 2013 TomatoesNZ recommendations for information that should be provided to those who handle irradiated produce. (Extract from a letter to the Minister for Food Safety, Hon. Nikki Kaye, 1 July 2013).
- B. Irradiated food labelling information packs distributed in 2014 to:
 - Retailers
 - Food Producers and Providers (catering/hospitality)
- C. Tomatoes NZ consumer “Irradiation Poll” results, Curia Market Research, April 2015.
- D. TomatoesNZ retailer survey results 2015.

Appendix A 2013 TomatoesNZ recommendations for information that should be provided to those who handle irradiated produce.

Appendix B. Irradiated food labelling information distributed to wholesalers, retailers and catering/hospitality in July 2014



Dear Retailer

You are required to label imported Australian tomatoes as irradiated

The Food Standards Code requires all retailers selling imported tomatoes that have been irradiated to label the produce as “irradiated”. To help you meet your legal obligations, enclosed is a laminated sign for you to place next to imported Australian tomatoes in your store.

All you need to do is place the sign next to any tomatoes imported from Australia. It’s laminated so you can write the price on it, and when it changes, wipe it clean and write the new price.

What is irradiation?

Irradiation is a Ministry for Primary Industries approved measure targeted at managing the risk of fruit flies and other harmful insect pests from entering New Zealand. Irradiation is recognised as an effective treatment that sterilises or prevents successful development of these insect pests.

The irradiation process involves using electrical beams, X-rays, or gamma rays which are generated from the radioactive source Cobalt 60.

According to the Ministry for Primary Industries, irradiated tomatoes do not pose any risk to human health and the nutritional value of the food is not significantly altered.

What’s required of retailers?

The Australia and New Zealand Food Standards Code – which all retailers must follow – requires all irradiated food to be labelled, or have a label displayed on or close to it, stating that it has been treated by irradiation.

Are all tomatoes irradiated?

No. Only imported tomatoes from Australia are irradiated. New Zealand tomatoes are never irradiated. You are only required to label imported tomatoes (and other produce) which has been irradiated.

How do I know if it's been irradiated?

To ensure you're meeting your legal obligations, you should ask your wholesaler whether they have been imported or if they are New Zealand grown. If they are imported, they will have been irradiated. If you are unsure whether your tomatoes have been imported, ask your supplier.

How can I help my customers?

You can help your customers by placing the signs by imported tomatoes. You can reassure them that irradiated tomatoes are safe to eat. If they want more information, you can direct them to the Ministry for Primary Industry's website www.mpi.govt.nz.

Enclosed is a brochure from the Ministry for Primary Industries with more information. If you require further information on irradiation or labelling requirements visit www.mpi.govt.nz or www.labellingtomatoes.co.nz.

Warm regards,

pp

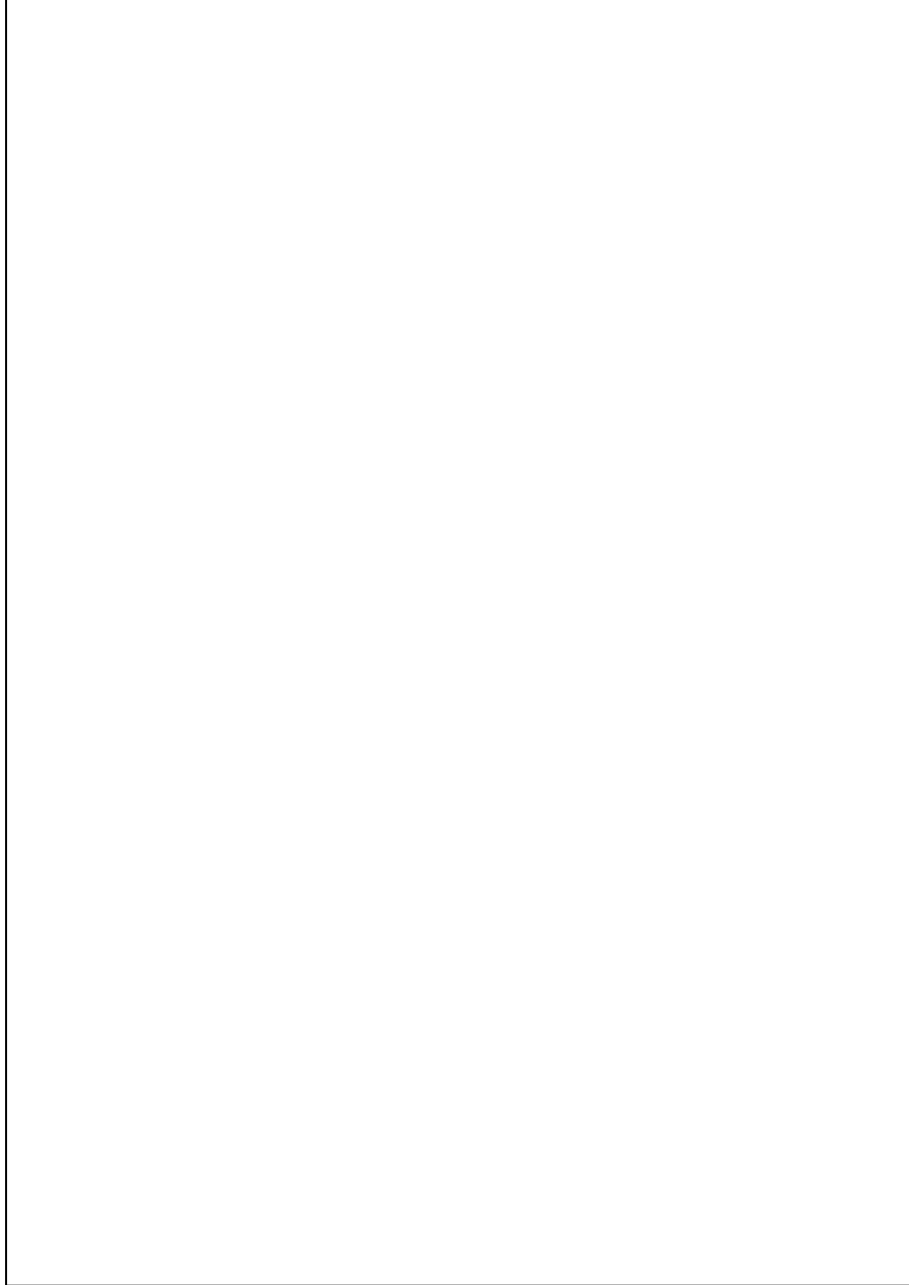
Alasdair MacLeod

Chairman – TomatoesNZ

Enclosed:

Australian Tomatoes retail sign

Ministry for Primary Industries Brochure: "Labelling requirements for irradiated foods – information for food businesses." July 2013



Sign provided to NZ retailers of Australian tomatoes (Actual sign size: A4 poster).



Dear Food Producers and Providers

You are required to label radiated tomatoes when they have been used as an ingredient or component in your product or dishes.

What are you required to do?

As you are a food provider/vendor you are required to inform your customers that the tomatoes used in their food have been irradiated.

Why do you need to inform customers that produce has been irradiated?

The Food Standards Australia New Zealand (FSANZ) Code – which covers all food providers – requires all irradiated food to be labelled, or have a label displayed on or close to it, stating that it has been treated by irradiation.

How do you label?

The FSANZ Code provides three examples of how the required statement can be displayed on irradiated food.

- Treated with ionising radiation
- Treated with ionising electrons
- Irradiated (name of food)

None of these words are compulsory and a different set of words can be used so long as the statement still indicates that the food has been treated with ionising radiation. Examples of where labels can be displayed include on a menu, sign on display cabinet, counter sign, label on packaging and point of sale display.

What is irradiation?

Irradiation is a Ministry for Primary Industries approved measure targeted at managing the risk of fruit flies and other harmful insect pests from entering New Zealand. Irradiation is recognised as an effective treatment that sterilises or prevents successful development of these insect pests.

The irradiation process involves using electrical beams, X-rays, or gamma rays which are generated from the radioactive source Cobalt 60.

According to the Ministry for Primary Industries, irradiated tomatoes do not pose any risk to human health and the nutritional value of the food is not significantly altered.

Are all tomatoes irradiated?

No. Only tomatoes imported from Australia are irradiated. New Zealand tomatoes are never irradiated. You are only required to label imported tomatoes (and other produce) which has been irradiated. You should ask your supplier whether the tomatoes have been imported or if they are New Zealand grown. If they are imported from Australia they will have been irradiated.

How can you help your customers?

You can help your customers by placing the signs by irradiated tomatoes. You can reassure them that irradiated tomatoes are safe to eat. If they want more information, you can direct them to the Ministry for Primary Industry's website www.mpi.govt.nz

Enclosed is a brochure from the Ministry for Primary Industries with more information. If you require further information or irradiation or labelling requirements then visit www.mpi.govt.nz or www.labellingtomatoes.co.nz.

Warm regards,



Alasdair MacLeod
Chairman - TomatoesNZ

**Appendix c. Tomatoes NZ consumer “Irradiation Poll” results, Curia Market
Research, April 2015.**

Please see separate document supplied with this submission.

The report can also be downloaded from:

[http://www.tomatoesnz.co.nz/assets/Irradiation-Labelling-Consumer-Poll-Results-
TomatoesNZ-April-2015.pdf](http://www.tomatoesnz.co.nz/assets/Irradiation-Labelling-Consumer-Poll-Results-TomatoesNZ-April-2015.pdf)

Appendix D. TomatoesNZ retailer survey results 2015.

Tomatoes New Zealand Auckland independent retailer survey Labelling of Irradiated tomatoes April 2015

Tomatoes NZ surveyed 51 independent retailers across Auckland in April 2015. The survey was completed face-to-face.

1. Do you sell tomatoes?

Yes	51
No	0

2. Do you purchase tomatoes from the wholesale markets or direct from growers?

Markets	43	84%
Growers	2	4%
Both	6	12%

All of the outlets surveyed stocked fresh tomatoes, and 96% sourced some or all of them from wholesale markets.

3. When purchasing from wholesalers, do you ever purchase imported Australian Tomatoes?

No	20	40%
Yes	26	52%
Don't Know.	4	8%

Just over half of the independent grocery outlets surveyed said they buy Australian tomatoes

3a. What are your reasons for only purchasing NZ tomatoes?

Customers prefer NZ tomatoes	6
Customers don't like Australian tomatoes	4
No particular reason	3
Australian Tomatoes are more expensive	1
Hard to sell Aussie tomatoes	1
Believes in local products	1
Want to support NZ growers	1
Against irradiated food	1

Australian tomatoes not available	1
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Half of those retailers who do not stock Australian tomatoes said that it was because customers don't like Australian tomatoes or customers prefer NZ tomatoes.

4a. (For those that stock Australian tomatoes) are you aware that all Australian tomatoes imported into NZ are irradiated?

Yes 21

No 5

Of those retailers who stock Australian tomatoes, 81% said they knew that they were irradiated.

4b. (For those that stock Australian tomatoes) are you aware of the labelling requirements for Irradiated Australian tomatoes?

Yes 16

No 10

Of those retailers who stock Australian tomatoes, 62% said they were aware of labelling requirements.

5a. What is your understanding of the labelling requirements?

From all responses (39):

None / No understanding	13
Needs to be labelled	6
Needs to be labelled Australian & Irradiated	6
Needs to be labelled Australian	5
Needs to be labelled Irradiate	2
Yes	2
Don't know	2
Labelled	1
Proper weight needs to be labelled	1
Let customers know it is imported	1
No response	13

Responses from those stocking irradiated tomatoes (14):

Needs to be labelled Australian & Irradiated	4
Needs to be labelled	4
Needs to be labelled Australian	3
Needs to be labelled Irradiated	2
Let customers know it is imported	1
No response	12

Out of 26 retailers who said they stocked irradiated Australian tomatoes, only six were able to correctly say that they must be labelled as irradiated.

A further three said they must be labelled Australian and a further four said they must be labelled but did not specify with what.

5b. Does the label need to include “Australia”?

Yes	37
No	2
Don't know	6

When prompted, 82% of retailers said that the label should include "Australia"

When considering only those retailers who said they purchased Australian tomatoes and were aware of the labelling requirements, 14 out of 16 (88%) said that they must be labelled Australian, when prompted.

5c. Does the label need to include “irradiated”?

Yes	31
No	6
Don't know	4

When prompted, 76% of retailers said that the label should include "irradiated"

When considering only those retailers who purchased Australian tomatoes and said they were aware of the labelling requirements, 14 out of 16 (88%) said that they must be labelled Irradiated when prompted.

6. Do you know where you would go to find out information about labelling requirements?

No	27	52%
Wholesale markets	13	25%
Google search	6	12%
MPI	3	
Australian growers website	1	
Website	1	
Yes	1	

When asked if they knew where to go for information about labelling requirements, 52% of all the retailers said they did not know. A quarter of retailers said they would go to the wholesaler for labelling information, and 15% said they would do a google search or look for a website.

Eleven out of the 26 retailers who stock Australian tomatoes said they did not know where to go for information on labelling. Nine said they would get information from the wholesale markets, and 5 named other sources.

IRRADIATION POLL April 2015

- CLIENT:** TomatoesNZ
- POLL DATES:** Mon 6 to Tue 21 April 2015. The median response was collected on Tue 14 April 2015.
- TARGET POPULATION:** New Zealand adults.
- SAMPLE POPULATION:** New Zealand adults who are contactable on a landline.
- SAMPLE SIZE:** 1,000 respondents agreed to participate.
- SAMPLE SELECTION:** A random selection of 15,000 nationwide phone numbers.
- WEIGHTING:** The results are weighted to reflect the overall adult population in terms of gender, age, and area.
- SAMPLE ERROR:** Based on this sample of 1,000 respondents, the maximum sampling error (for a result of 50%) is +/- 3.2%, at the 95% confidence level.
- CODE COMPLIANCE:** This poll was conducted in accordance with the New Zealand Political Polling Code, the Research Association New Zealand Code of Practice and the International Chamber of Commerce/European Society for Opinion and Market Research Code on Market and Social Research.



We have some questions on irradiated food. Some foodstuffs are irradiated to help preserve the food and eradicate bacteria and pests. This involves exposing the food to ionising radiation from x-rays or gamma rays. The rays pass through the food like microwaves in a microwave oven, but the food does not heat up to any significant extent.

Would you like fruit and vegetables that you buy that have been treated with irradiation to be clearly labelled as irradiated?

Label irradiated fruit & veges

	Count	Col %
Label irradiated fruit & veges Yes	853	85%
No	92	9%
Unsure/refuse	59	6%
Total	1004	100%

85% of respondents want fruit and vegetables that have been irradiated to be clearly labelled as such.

Label irradiated fruit & veges BY Gender

	Gender	
	Female	Male
	Col %	Col %
Label irradiated fruit & veges Yes	88%	81%
No	6%	13%
Unsure/refuse	6%	5%
Total	100%	100%

88% of women and 81% of men want fruit and vegetables that have been irradiated to be clearly labelled as such.

Label irradiated fruit & veges BY Age Group

		Age Group			
		18-30	31-45	46-60	61+
		Col %	Col %	Col %	Col %
Label irradiated fruit & veges	Yes	85%	83%	88%	83%
	No	11%	10%	7%	10%
	Unsure/refuse	4%	8%	5%	7%
	Total	100%	100%	100%	100%

No major differences by age.

Label irradiated fruit & veges BY Urban Type

		Urban Type		
		Cities	Towns	Rural
		Col %	Col %	Col %
Label irradiated fruit & veges	Yes	84%	89%	86%
	No	10%	6%	8%
	Unsure/refuse	6%	5%	6%
	Total	100%	100%	100%

Little difference by area also..

If a dish you order in a restaurant, café or takeaways includes fruit or vegetables that has been irradiated, would you like to know that the dish includes irradiated food?

Know if dish includes irradiated food

		Count	Col %
Know if dish includes irradiated food	Yes	782	78%
	No	155	15%
	Unsure/refuse	64	6%
	Total	1002	100%

78% of respondents wish to know if a dish they order includes irradiated food.

Know if dish includes irradiated food BY Gender

		Gender	
		Female	Male
		Col %	Col %
Know if dish includes irradiated food	Yes	82%	74%
	No	12%	20%
	Unsure/refuse	7%	6%
	Total	100%	100%

82% of women and 74% of men wish to know if a dish they order includes irradiated food.

Know if dish includes irradiated food BY Age Group

		Age Group			
		18-30	31-45	46-60	61+
		Col %	Col %	Col %	Col %
Know if dish includes irradiated food	Yes	76%	78%	82%	75%
	No	20%	14%	14%	16%
	Unsure/refuse	4%	8%	4%	9%
	Total	100%	100%	100%	100%

Know if dish includes irradiated food BY Urban Type

		Urban Type		
		Cities	Towns	Rural
		Col %	Col %	Col %
Know if dish includes irradiated food	Yes	78%	78%	79%
	No	16%	16%	13%
	Unsure/refuse	6%	6%	8%
	Total	100%	100%	100%

Director
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