



**Association of European Consumers**  
*socially and environmentally aware*  
*Association Européenne des Consommateurs*  
*socialement et environnementalement responsables*



## Open letter to the members of the European Parliament Environment Committee

Brussels 23<sup>rd</sup> August 2002

### Re: Environment Committee Report on Irradiation of Food

We would like to draw your attention to a report on food irradiation (rapporteur: Hiltrud Breyer, reference COS/2002/2008). This report will be on the agenda of the Environment Committee from 10<sup>th</sup> September 2002. The report considers the controversial question of which foods should be included in the final Community list of foods authorised for treatment with ionising radiation<sup>1</sup>. Your vote on this report will help in making this important decision, affecting the food eaten by all of us throughout Europe and beyond.

#### *Consumer concerns over food irradiation*

Food irradiation is the treatment of food with high doses of ionising radiation derived from radioactive isotopes (usually Cobalt 60) or electronic sources of energy. It is promoted as a method for delaying the sprouting and ripening of vegetables and fruit, for killing some food-poisoning micro-organisms that can contaminate foods, and for the dis-infestation of insects in foods such as grains and fruit. Yet for decades this technology has had little commercial success.

The current Community list includes only one food category authorised for treatment with irradiation - herbs, spices and vegetable seasonings. Until this list is completed, Member States can maintain their national authorisations and restrictions governing which foods they permit for irradiation. Only five Member States (Belgium, France, Italy, Netherlands and UK) permit the irradiation of any additional food categories. Even in these States only a few of the foods that they permit are irradiated in practice, and in most cases the percentage of those foods which are irradiated is small.

Very few foods are irradiated in the EU and around the world because of long-standing public opposition. Irradiation is an expensive technology with many potential hazards for consumers, workers and the environment. An EC Consultation<sup>2</sup> conducted by DG SANCO in the autumn of 2000 showed that consumer organisations, many sectors of the food industry and some governments doubt whether there is a real technological need for irradiation. They are concerned that dangerous misuse of irradiation, as a substitute for good hygiene in food

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<sup>1</sup> The framework Directive contains a requirement to complete the Community positive list of foodstuffs authorised for irradiation through the co-decision procedure.

<sup>2</sup> View the DG SANCO Consultation and responses at [http://europa.eu.int/comm/food/fs/sfp/fi\\_index\\_en.html](http://europa.eu.int/comm/food/fs/sfp/fi_index_en.html)

production and processing, is likely to increase if the technology becomes more widely used. Consumer organisations are also opposed to irradiation because it does not offer real benefits to the consumer.

### ***The problem of illegal irradiation***

In June 2002 the UK Food Standards Agency published the results of a survey which revealed that illegally irradiated, unlabelled herbal supplements, seafoods and spices were being sold to UK consumers. The irradiation treatment of foods must be carried out in compliance with the food irradiation Directives<sup>3</sup> and all irradiated foods or foods containing irradiated ingredients must be labelled. The UK survey shows that enforcement of the technology remains difficult. Such breaches of irradiation standards mislead consumers and ignore their right to know if their food has been irradiated. Illegal irradiation also poses potential health risks to consumers.

Some of the products identified in the UK survey were also found on sale in Denmark, but the Danish Government said they had no plans to conduct an irradiation survey. This demonstrates a serious problem within the existing irradiation regulations. As there is no requirement by the irradiation Directives for Member States to conduct regular irradiation detection surveys, unlabelled, illegally irradiated food could be on sale but undetected in every EU Member State.

There are certain key recommendations within the irradiation report which we urge you to support:

#### **1. No more food to be permitted for irradiation in the EU**

We support the recommendation of the Breyer report that the current Community list be considered as complete without the addition of any more food categories. If more foods are gradually permitted there is a danger that eventually most or all foods will be irradiated. Research into the long-term health effects of eating a diet largely comprised of irradiated foods still needs to be conducted and scientifically reviewed. This research needs to take account of the radiolytic by-products created in some irradiated foods, and of the nutritional losses caused by irradiation. The nutritional content of irradiated foods is further depleted by the longer shelf-life of the food and by cooking, contributing to the problem of over-processed foods of poor nutritional quality.

#### **2. Introduction of mandatory irradiation detection programmes**

We support the recommendation of the Breyer report that the Government of each Member State should be required to conduct irradiation testing programmes, in order to monitor whether food irradiation is being controlled and to prevent illegal irradiation. Until existing Community legislation on food irradiation is effectively enforced in every Member State, new legislation allowing the irradiation of more foodstuffs cannot be supported.

#### **3. Substitution principle to be applied in the interests of safety**

The Breyer report stresses that the substitution principle should apply in making this decision: dangerous processes should be substituted with safer processes to avoid risks to

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<sup>3</sup> The food irradiation Directives 1999/2EC (framework Directive) and 1999/3/EC (implementing Directive) became applicable on 20 September 2000. View at [http://europa.eu.int/comm/food/fs/sfp/fi\\_index\\_en.html](http://europa.eu.int/comm/food/fs/sfp/fi_index_en.html)

workers, human health and the environment. We strongly support this approach because the use of radioactive materials for irradiating foodstuffs involves serious risks. Workers are at risk from accidental exposure, and human populations and the environment are at risk from spills and leaks. There is a growing risk of terrorists obtaining radioactive materials for use in 'dirty bombs' (conventional bombs containing radioactive materials). Therefore the building of more irradiation facilities means greater security risks for everyone. Better security measures are now essential, but will mean higher costs for irradiation companies. Inevitably, consumers will have to meet these costs.

Your vote will be crucial to these decisions. We hope you vote in favour of the Breyer report at the open Environment Committee meeting on the 8<sup>th</sup> October 2002.

For more information please contact Merav Shub on +44 207 837 9229.

Yours sincerely,

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*in collaboration with*

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***Co-signatories:***

Euro Coop - European Community of Consumer Co-operatives

Friends of the Earth

Biodynamic Agricultural Association, UK

Centre for Food Policy, Thames Valley University, London

Elm Farm Research Centre, UK

National Federation of Women's Institutes (England, Wales & the Islands)

Soil Association, UK

Women's Environmental Network, UK