



Fairtrade Australia and New Zealand Ltd (FANZ) is an independent non-profit organization that solely licenses the use of the Fairtrade Mark on products in Australia and New Zealand in accordance with internationally agreed Fairtrade Standards. Fairtrade Standards are designed to support the sustainable development of small producer organizations and agricultural workers in developing countries. In Australia, our mission is to connect disadvantaged producers and consumers, promote fairer trading conditions and empower producers to combat poverty, strengthen their position and take more control over their lives.

Whilst recognising that the current call for submissions is limited to irradiation as a phytosanitary measure for all fruits and vegetables, FANZ respectfully requests the consideration of the use of irradiation to be extended to include cut flowers, specifically, in the first instance, cut roses. Australian production of roses plummets in the cooler months while demand remains constant. Australian wholesalers therefore ramp up orders from developing countries during these periods. FANZ is working with industry to introduce Fairtrade certified cut roses that comply with Fairtrade Standards.

Fairtrade Standards incorporate a holistic blend of social, economic and environmental criteria. Chemicals harmful to people and the environment are inscribed in the Fairtrade Hazardous Materials List. Methyl bromide, the chemical used extensively for fumigation by the Australia Quarantine Inspection Service, is banned under the Hazardous Materials List. This is, in effect, a non-tariff barrier prohibiting Australian importers from sourcing Fairtrade certified roses. This, by default, left importers who seek to support the Sustainable Development Goals, in particular, poverty reduction, health and the environment through buying Fairtrade, with no choice but to import roses from non Fairtrade certified farms.

In an effort to find a solution, FANZ presented a case to the Fairtrade International Standards Board, seeking an exemption for the use of methyl bromide on cut roses, in quarantine (thus in compliance with the Montreal Protocol). This is and remains a cause of huge concern by Fairtrade International and member entities such as Fairtrade Africa (which overseas export). It was difficult for us to structure a case supporting the use of methyl bromide when all evidence demonstrates high levels of toxicity and harm to people and the environment, in particular the ozone layer.

We were successful in securing a time-bound exemption for two years on the “strict condition” that we “work during this period to replace methyl bromide with alternative materials.”

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We have: Irradiation. It is used not only on fruits and vegetables in several countries, but also on cut roses as a means of controlling for pests and meeting biosecurity concerns. Further, Roses are not for consumption, lessening concerns arising from the use of irradiation on ingested products.

A delegation comprised of FANZ and industry partners visited the X-Ray phytosanitary irradiation treatment facility in Melbourne. Roses require cold chain. The facility is cold chain friendly, chemical free, ozone friendly and apparently soon to be carbon neutral with the installation of a renewable energy source at the facility. One of our industry partners ran preliminary tests at the facility to determine the impact on the vase life of roses. 800 greys achieved a commercially viable result. More research is required.

A barrier to utilising irradiation as a phytosanitary treatment is a lack of standards. We strongly urge FSANZ to approach this treatment and proposal from a scientific perspective. FANZ and a growing number of industry partners, see this as a means for Australian importers/wholesalers to deliver to retail and consumers, roses that comply with Australia's biosecurity regulations, Fairtrade's Hazardous Materials List, and Fairtrade Standards. The treatment of Fairtrade certified roses for entry into the Australian market is a win for Australian consumers, retailers and wholesalers, importing roses in our cooler months; to workers on Fairtrade certified farms who receive a premium on Fairtrade product sold in Australia; and the environment as we switch out of harmful methyl bromide to irradiation as a solution.

We commend progress to date on the development of some, limited standards for the use of irradiation as a phytosanitary measure to comply with Australian biosecurity regulations and respectfully request this be extended to the development of standards for use in the irradiation of cut roses.

Sincerely,

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**Chief Executive Officer**

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