

[REDACTED]

From: submissions
To: [REDACTED]
Subject: RE: submission RE:A1193: irradiation as a phytosanitary measure for all fruit and vegetables

From: [REDACTED]
Sent: Tuesday, 8 December 2020 5:06 PM
To: submissions <submissions@foodstandards.gov.au>
Cc: [REDACTED]
Subject: submission RE:A1193: irradiation as a phytosanitary measure for all fruit and vegetables

To FSANZ,

I am writing to express my concern regarding the application before FSANZ, known as A1193 which is to allow the irradiation of all fresh fruit and vegetables. I am completely opposed to the irradiation of fresh fruit and vegetables because it alters or destroys many of the nutrients and beneficial enzymes which they contain. There is absolutely no good reason to be irradiating our food. It is well known that eating fresh fruit and vegetables is essential to maintaining a healthy human biology.

As more and more people are changing their diets to include greater proportions of plant foods it is morally and ethically irresponsible to be introducing legislation which reduces the health benefits of these foods.

Food irradiation serves no valuable purpose as its function is to extend shelf life. Fresh fruit and vegetables are chosen by consumers because they are fresh and contain many essential vitamins and other nutrients that we simply can't get in cooked or processed foods.

Claims that irradiated foods are safe are simply not true as no research on the long term consumption of significant numbers of irradiated foods have been conducted. FSANZ makes the fundamental error of asserting that a lack of evidence of harm is the same as evidence of safety.

There is no technological need for irradiation as numerous alternatives exist. As an importer and producer of organic foodstuffs I know that there are many alternatives to irradiation which preserve and protect the nutritional integrity of our food. Non-chemical de-contamination methods include: heat/steam vapour treatment, cold treatment, exclusion zones, modified atmospheres and vacuum packs.

I am also concerned that food which is irradiated will not be clearly labelled or stated as such in the advertising and selling of them.

As a mother who feeds her family with a predominantly plant based diet I am very alarmed about the possibility that the foods which I choose to buy for my family because they are fresh and “alive” may actually have been cooked by the irradiation process and I will not know.

As a consumer it is my right to know whether the food I buy has been irradiated.

Even though irradiation is promoted as beneficial to Australian farmers; each approval also enables irradiated imports from overseas. Irradiation is a tool of large agribusiness that will be used on top of, not instead of, chemical treatments. It supports mass production systems that diminish the power of smaller Australian food producers and markets.

For all of the above reasons this legislation A1193 should be rejected.

I am dismayed to hear that FSANZ changed the date of public consultation on this important matter without properly informing the public or giving them sufficient time to respond.

In January this year, Food Standards Australia New Zealand (FSANZ) published an announcement that it would assess and application by the Queensland Department of Agriculture and Fisheries to allow the irradiation of all fresh fruit and vegetables.

The published proposed timeframe for the assessment of this application, known as A1193, would see work commencing in November 2020 and public consultation taking place next year- early April 2021.

In May, the Queensland government paid to fast-track the processing of the application. This information was not published on the A1193 webpage, nor was it published in FSANZ notification circulars. In fact, while the application was re-announced in May, there was no reason given for the re-announcement and no change to information previously provided. The A1193 webpage continued to display only material that suggested the public consultation dates were April next year.

On October 30 FSANZ notified the public of a 6-week time frame on which to respond to this issue. Six weeks is simply not enough time to ensure all members of the public have a chance to express their views on this matter. By changing the date of public consultation, unannounced, FSANZ has limited the scope of possible community engagement beyond FSANZ's networks, disadvantaged the community it is meant to protect and represent and thus failed to provide opportunity for the robust community conversations required in a functioning democracy.

It is imperative that the public consultation period is extended beyond the current date of 12th December 2020.

Sincerely,



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