



**SUBMISSION RESPONSE TO APPLICATION 1193:
IRRADIATION AS A PHYTOSANITARY MEASURE
FOR ALL FRESH FRUIT AND VEGETABLES**

About Us

The Food and Beverage Importers Association (FBIA) represents and promotes the interests of food importers with governments, authorities and key industry stakeholders. The association works to minimise the impact of regulations while achieving the government's public policy objectives.

The FBIA is an industry association supporting Australian importers of food and beverages in retail ready packs, food service and product as an ingredient for further processing. Members include companies operating in freight and logistics, expanding our coverage of the supply chain.

Members range from large multi-national companies to small specialist importers. Member imports include a wide range of commodities such as vegetables; fruits; nuts; dairy; seafood; confectionery; and oils. Products are imported in a range of formats, including frozen; fresh; roasted; prepared; processed; and retorted. The value of FBIA member food imports is approximately \$1.2B; making them a significant contributor to the Australian economy.

COVID-19 presented challenges for imported food such as supply chain issues, shipping and container access, managing ingredient supply and availability. The FBIA worked with members, the Department of Agriculture, Water and the Environment and FSANZ to manage these unprecedented impacts. Importers are fully informed to support continuation to manage import and supply, and to manage their business to meet COVID Safe requirements.

FBIA importer members are in a growing sector with the growth of imported food predicted to initially remain steady with increases year on year. Imported food accounts for a large share of the gourmet grocery items and international foods, catering to Australia's large number of ethnic communities. IBISWorld

The FBIA is represented on a range of industry related committees to ensure our members are fully aware of legislation, regulations and compliance that affects their businesses. FBIA representation ensures governments and other bodies can access credible industry feedback which supports the ongoing development of instruments which govern the importation of food and trade.

Further information on activities and management of the FBIA go to the Association's website: www.fbiam.org.au.

Application Summary

The Queensland Government Department of Agriculture and Fisheries has made an application to FSANZ to permit irradiation as a phytosanitary measure for all types of fresh fruit and vegetables, extending the current permissions in place for 26 fruits and vegetables in Standard 1.5.3 of the Australia New Zealand Food Standards Code (the Code).

The application includes fresh fruit and vegetables presently described in Schedule 22 of the Code, and any other fresh commodity generally understood to be a fruit or vegetable, with the exception of dried pulses and legumes (classified as 'Vegetables' in Schedule 22), and nuts and seeds (classified as a separate food group 'Nuts and Seeds' in Schedule 22). The application includes imported fruit and vegetables and fruits and vegetables from one Australian state to another.

The application seeks permission for the use of this treatment measure for the purpose of pest disinfection, requiring an amendment to Standard 1.5.3 – Irradiation of food of the Code replacing the existing permission.

The same dose range, 150 Gray (Gy) to 1 kiloGray (kGy), currently prescribed for permitted fruit and vegetables in the Code would continue to apply if this application is approved.

FBIA Comment

Current evidence suggests irradiation is an efficient and effective phytosanitary treatment. The treatment would protect global and local trade in fruits and vegetable, reducing the biosecurity risk. The use of irradiation is endorsed internationally by Codex Alimentarius, the International Plant Protection Convention, and is supported by relevant quarantine agencies in Australia and New Zealand. This change would align Australia and New Zealand more closely with existing global standards and regulations including the Codex General Standard for Irradiated Foods, moving toward international standards harmonisation.

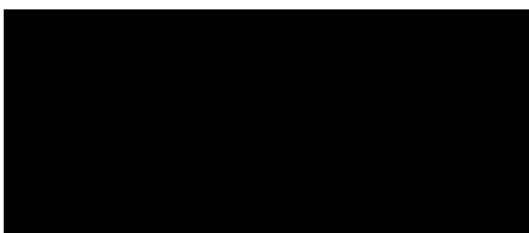
The risk and technical assessment concluded that there are no public health and safety concerns associated with the consumption of fresh fruit and vegetables that have been irradiated at doses of up to 1 kGy. The proposed dosage of up to 1 kGy is within international standards.

The FBIA would support the introduction of irradiation for all fruits and vegetables, not limited to those currently listed in the Code. This will help ensure Australia's biosecurity risk, through exposure from imports or state-state, is mitigated - protecting the environment and importantly future trade.

The FBIA would support a statement on pack ensuring consumers are aware that the fruits and vegetables have been treated with ionising radiation.

If you have any questions, please contact me.

Yours sincerely



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