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**From:** [REDACTED]  
**Sent:** Friday, 11 December 2020 2:03 PM  
**To:** submissions  
**Cc:** [REDACTED]  
**Subject:** Submission RE: A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables

**Categories:** [REDACTED]

\*Submission to:\* Food Standards Australia New Zealand

11 December 2020

\*Subject\*: Submission RE: A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables

\*POSITION \*

1. I oppose this application for blanket approval of irradiation for all fresh fruit and vegetables.
2. I oppose FSANZ's shortening of the submission time frame.

\*DESIRED OUTCOMES\*

1. I call on FSANZ to reject A1193 and to rescind all previous irradiation approvals.
2. I call on FSANZ to extend the submission deadline to allow for greater public engagement and consultation.

\*REASONS\*

IRRADIATION IS NOT NEEDED

1. Other safer alternatives exist for phytosanitary control.
2. Irradiation to extend shelf life may appear to benefit wholesalers and retailers but is not in the best interests of consumers.

HEALTH RISKS OF IRRADIATED FOODS

1. Approving this application would not benefit my family or community – in fact it would increase health risks.
2. I am opposed to food irradiation on health grounds. Numerous studies have shown that eating irradiated food has health risks.
3. Irradiated food has been shown to reduce the nutritional value of food, by a lowering of vitamins A, B, C, E and K; and by depleting proteins and essential fatty acids.
4. Eating irradiated food has also been linked with immune system disorders, an increase in abnormal lymph cells, decreased fertility, kidney damage and genetic damage.
5. Food irradiation disrupts the molecular structure of food, increases free radicals, and produces potentially harmful compounds such as benzene and formaldehyde.
6. In 2008-2009, irradiation was responsible for neurological disorders leading to paralysis and, in some cases, death of up to 100 pet cats in Australia. Because of this, irradiated cat food is now banned in Australia. The European Food Safety Authority acknowledges that the

risk to humans cannot be ruled out.

7. The option of irradiating any fresh fruits and vegetables will lead to a greater proportion of irradiated foods in people's diets, therefore increased health risks.
8. Claims of the safety of irradiated food cannot be made as there have been to date no long-term studies into the effects of eating irradiated food.
9. Allowing irradiation across the board for fresh produce is akin to conducting a completely uncontrolled experiment on people, many of whom may be unaware they are participating.
10. Further studies on irradiated foods are essential in order to properly evaluate the health impacts, before food irradiation can be allowed.

## **LABELLING AND LOSS OF CONSUMER CHOICE**

1. Current labelling laws for irradiated foods in New Zealand and Australia are inadequate, meaning that already consumers are unwittingly eating foods that are currently approved to be irradiated.
2. I am concerned that inadequate labelling would continue if A1193 is approved, leading to a greater proportion of irradiated foods in people's diets, and therefore increased health risks.
3. Without adequate labelling, consumers are in the dark and cannot make an informed choice about the food they buy.
4. I prioritise buying and eating organic foods. Irradiation is not allowed under organic standards. Potentially this application A1193 could reduce the amount and variety of certified organic foods available, for example if some organically grown foods are then irradiated.
5. IF A1193 is approved, labelling laws must be strong and robust so that any and all irradiated produce is clearly and legibly labelled as "irradiated" or "treated with irradiation" on any packaging or (in the case of loose produce) at the point of sale.

## **ENVIRONMENTAL AND SOCIAL IMPACTS**

1. Irradiating fresh produce does not - and will not - reduce the use of harmful chemicals such as pesticides in food production - it would be additional to it.
2. Food irradiation is part of an industrial food production model that favours profits over people's health, and prioritises non-organic agri-business models of food production, which deplete soils, contaminate soils and waterways, reduce biodiversity, contribute to poor health of workers, animals and ecosystems. These food production systems have a high climate change footprint. At best they disadvantage, and at worst destroy, family farms and smaller-scale local food production.

## **FSANZ'S OBJECTIVES AND STATUTORY DUTIES**

1. The stated object of the FSANZ Act is "to ensure a high standard of public health protection throughout Australia and New Zealand." In order to ensure this high standard, FSANZ must adopt a precautionary approach by rejecting A1193.
2. The first goal of the FSANZ Act is "a high degree of consumer confidence in the quality and safety of food produced, processed, sold or exported from Australia and New Zealand". A1193 gives our family a low degree of consumer confidence in the quality and safety of irradiated food produced, processed, sold or exported from

Australia and New Zealand. FSANZ must reject A1193.

3. The third goal in the Act is "the provision of adequate information relating to food to enable consumers to make informed choices." For the reasons I've outlined above, I am not confident that adequate information about irradiated foods would be provided for consumers to make a genuinely informed choice.

Thank you and I look forward to hearing your response to my concerns.

Yours sincerely,

[REDACTED]

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