

SUBMISSION

Application A1193

Irradiation as a phytosanitary measure for all fresh fruit and vegetables

I have no objection to the application on technical justification or safety grounds, provided that labelling requirements are sufficiently onerous and diligently administered and enforced.

On that proviso I can get no confidence whatsoever from the call for submissions paper that the current labelling requirements are adequate, or that the irradiation standard itself is adequately administered or enforced. That is not to say that the standard is not properly administered by the Commonwealth at the point of import, or by the States and Territories, but as FSANZ states, this is a key requirement in considering the application. I quote

There may be incremental but likely inconsequential costs to government in terms of monitoring and enforcement to ensure compliance with the labelling requirements. As the permission relates only to fresh fruit and vegetables, monitoring is also required to ensure that any irradiated foods that do not fall within this definition and that are not approved, are not illegally entering the food supply.

Evidence therefore should have been included to assure the public that imported goods are being checked at the point of entry, that record keeping is carried out and monitored by the States and Territories, that no non-approved foods are irradiated and sold, and that labelling requirements are being complied with, monitored and enforced.

Two fundamental issues. First, I cannot recall ever seeing any packaged food, or ingredient of a packaged food being labelled as irradiated. I cannot recall ever seeing any unpackaged fruit or vegetables displayed as irradiated. Second, I suspect that a substantial section of the Australian public remains vehemently opposed to food irradiation, largely because the industry has made little or no effort to educate the public on its efficacy and safety. As one colleague said, "I would not feed irradiated food to my dog". Arguably an uninformed view, but strongly held and difficult to change.

There is a very real risk here that at some point the media may decide to investigate the irradiation of food generally, not just fruit and vegetables, and if they were to discover that the public has been unwittingly consuming irradiated food because of inadequate legislation, inadequate monitoring or inadequate enforcement, there could be a significant backlash against the use of this extremely useful technology.

Legislation

Standard 1.5.3—9 Labelling and other information—retail and catering.

The heading appears to limit labelling requirements to retail and catering. The fruit and vegetable retailer buys cases of fruit and vegetables at the markets, unpacks them for display and sale. There is no declaration of "irradiated" on the case, or in accompanying documentation, according the retailer would not declare "irradiated" on the display.

Not that they would anyway according to another colleague. "Marketing suicide" I think the expression was.

Monitoring

Monitoring of record keeping should not be a problem, likewise tracking of irradiated product to ensure labelling compliance down to retail and catering. Record keeping of the irradiation of non-approved foods seems unlikely to occur and would require other means of detection.

I am not aware of any analytical methods to detect irradiation, or to detect if the irradiation is within permitted dose limits. Fluorescence was mentioned as a possibility years ago. The public would likely have more confidence in the sale and consumption of irradiated food, and this application, if there was included information included about the ability to detect foods which had been irradiated. Conversely a loss of confidence may occur if detection is difficult or impossible.

Conclusion

I suggest that this application should not proceed to the Ministerial Forum until there is clear evidence to provide to the Forum, that administration, monitoring and enforcement is being carried out at the Commonwealth, State and Territory level. And that this should apply not only to fruit and vegetables but to all foods.



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