



NEW ZEALAND
FRESH PRODUCE
IMPORTERS
ASSOCIATION INC.

6th November 2012

Food Standards Australia New Zealand
P O Box 10559
The Terrace
WELLINGTON

Via email to: submissions@foodstandards.gov.au

Dear Sir/Madam

New Zealand Fresh Produce Importers Association Inc.
Submission on Application A1069: Irradiation of Tomatoes and Capsicums

The New Zealand Fresh Produce Importers Association Inc. (NZ FPIA) represents importers, wholesalers, distributors and retailers of imported fresh produce. The current membership accounts for approximately 98% (by volume and value) of all fresh produce imported into New Zealand, including tomatoes and capsicums from Australia. Four key objectives underpin all NZ FPIA activities:

- *Provide an independent forum for importers of fresh produce to discuss and advance issues of mutual interest in an environment that does not compromise the commercial activities of Members; and,*
- *Improve the access for fresh produce into New Zealand by ensuring that all import requirements are consistent, technically justified, commensurate with real risks and provide the least practical restrictions to trade; and,*
- *Be actively involved with the development of biosecurity (and other regulatory driven) decisions, policies and practices to ensure that Members' interests are represented and considered; and,*
- *Co-operate and build partnership arrangements with those parties who have an interest and influence in the importation of fresh produce into New Zealand.*

A special project fund has been established for agreed Association projects. These projects contribute to meeting one or more of the Association objectives. The NZ FPIA project funding pool has contributed to several projects relating to developing alternatives to dimethoate to maintain and enhance trade from Australia to New Zealand. This has included contributions to support the consideration of irradiation as a post-harvest treatment option for tomatoes, capsicums and a range of other commodities.

In relation to Application A1069, the NZ FPIA:

1. *Agrees with the safety assessment conclusions contained in the assessment document dated 26 September 2012; and,*
2. *Agrees that the use of irradiation as a post-harvest treatment for phytosanitary purposes poses no risks to consumers; and,*
3. *Supports the recommendations to accept irradiation as a valid phytosanitary treatment for tomatoes and capsicums.*

The data provided via the application process, including similar supporting data from a range of other sources, shows that the consumption of irradiated produce (including tomatoes and capsicums) is safe for consumers. There is already a history of safe consumption of irradiated foods, including fresh fruit and vegetables, in many countries. In a New Zealand context, this includes the importation, sale and consumption of irradiated mangoes and litchi from Australia. In particular, the mango import programme from Australia has grown significantly in volume and importance over recent years and is now considered as a major import category filling an important market niche. The necessary infrastructure requirements in terms of irradiation facilities, equipment, operational procedures and commercial trade practices are already in place to quickly facilitate the addition of tomatoes and capsicums into the irradiation treatment pathway. Furthermore, the required bilateral export-import phytosanitary systems and documentation frameworks (e.g. New Zealand import standards and bilateral quarantine arrangements) are already in place to include the irradiation treatment option for the commodities concerned.

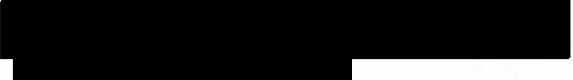
The NZ FPIA believes the application for irradiation of tomatoes and capsicums should be approved as an extension to Standard 1.5.3 – Irradiation of Food. Irradiation will enable the import of tomatoes and capsicums to re-commence in 2013 following a season of no trade in 2012. The resurrection of trade will ensure that New Zealanders will have continued availability of tomatoes and capsicums at affordable prices throughout the year, via the Australian pathway. Prior to the removal of the dimethoate treatment option, both tomatoes and capsicums had been imported into New Zealand from Australia in significant volumes for more than 20 years. Although several options are actively being considered as future alternatives to dimethoate, it is noted that there are currently no options approved for tomatoes and capsicums to fill the traditional winter import window in New Zealand. Consequently, irradiation is considered as an ideal alternative for the post-harvest disinfestation of tomatoes and capsicums following the removal of the dimethoate treatment option in Australia.

The NZFPIA notes and supports the requirements for labeling of irradiated foods in New Zealand. The trade of irradiated mangoes and lychees from Australia over recent years has shown that the required labeling requirements can be successfully met under commercial trading and retail conditions. The NZ FPIA also considers that the labeling requirements offer an additional opportunity for the education of consumers on the benefits of irradiation to safely meet a technological need (i.e. to meet New Zealand biosecurity/phytosanitary requirements).

In the future, the NZ FPIA also requests that FSANZ fast-tracks all future phytosanitary related horticultural applications and assesses these as a generic group for phytosanitary treatment purposes. The results of the tomato and capsicum assessments (and others that preceded them) clearly demonstrates that there are no nutrient or food safety related issues associated with low dose irradiation treatments used for phytosanitary purposes. The use of a generic approach will not only speed up the application process but will greatly reduce the cost to industry that is currently required to fund the case-by-case nutrient analysis work and assessment processes. The available data covering a range of produce types shows that the irradiation treatment of fresh produce for phytosanitary purposes has no detrimental impacts in terms of quality, nutrient content, nutrient composition or other food safety concerns. There is no technological reason, or regulatory justification, for continuing with the commodity-by-commodity assessment approach.

The NZ FPIA looks forward to a favorable outcome from the FSANZ assessment process and the successful export of tomatoes and capsicums from Australia to New Zealand in 2013. Furthermore, the NZ FPIA also looks forward to working closely with FSANZ on the “generic” (or grouped) application and assessment of horticultural commodities using irradiation as a post-harvest treatment.

Yours sincerely /


Kevin Nalder
Chief Executive Officer
New Zealand Fresh Produce Importers Association Inc.