



Standards Management Officer
Food Standards Australia New Zealand
PO Box 5423
Kingston ACT 2604

Email: submissions@foodstandards.gov.au

7 December 2020

To whom it may concern

Application A1193 - Irradiation as a phytosanitary measure for all fresh fruit and vegetables

Allergy & Anaphylaxis Australia (A&AA) strongly encourages Food Standards Australia New Zealand (FSANZ) to seek advice on issues surrounding irradiation of fruit and vegetables, allergenicity and impact on nutritional content for people with food allergy through the FSANZ Food Allergy and Intolerance Scientific Advisory Group of experts in allergic disease as a matter of routine. Considering that fruit and vegetable allergy is on the increase world-wide, the need to have expert advice on the effect of irradiation on fruit and vegetables in terms of allergenicity is not unwarranted.

Allergenicity

A&AA notes that at 2.1.2 of the Application it is stated "There is no evidence to indicate that phytosanitary irradiation at the proposed doses would increase the allergenicity of food" however the example cited is that of a tree nut (pistachio nut) and not a fruit or vegetable. As we know that cooking of food can either increase or decrease allergenicity of food allergens (boiled peanuts are less allergenic than roasted peanuts; some people with cow's milk or egg allergy can tolerate baked egg or milk in a food product such as a muffin) we cannot draw conclusions on irradiation of fruit and vegetables based on the allergenicity outcome of one tree nut.

Nutritional value

Application A1193 states that the nutritional value of food is decreased when irradiated. A&AA notes that again in 2.1.2 FSANZ states that, "There is evidence of losses of vitamin C and β -carotene in irradiated fruit and vegetables but these losses are, with few exceptions (i.e. spinach and rocket), small and of negligible impact to overall population nutrient intakes." People with food allergy rely heavily on unprocessed foods such as fruit and vegetables. Those with multiple food allergy rely on a much smaller range of foods including fresh fruit and vegetables and their nutrition may therefore be more significantly impacted by irradiation.

Allergy & Anaphylaxis Australia – *Your trusted charity for allergy support*



For the above reasons, we encourage FSANZ to seek expert advice from the FSANZ Food Allergy and Intolerance Scientific Advisory Group. A&AA also asks FSANZ to confirm that food that is currently irradiated is communicated to consumers at point of sale and that if fruit and vegetables were to be irradiated in the future, that this would also be communicated to consumers at point of sale.

Thank you for the opportunity to provide comment on A1193. We look forward to hearing about progress on the application.

Yours faithfully

[Redacted signature block]

[Redacted contact information block]