



# PROFESSIONAL FOOD & PHARMACEUTICAL SERVICES

22 December 2020

Food Standards Australia New Zealand  
PO Box 5423  
Kingston, ACT,  
Australia, 2604.

## SUBMISSION

### **Re: Application A1193 – Irradiation as a Phytosanitary Measure for All Fresh Fruits and Vegetables**

Attention: Food Standards Manager

Professional Food and Pharmaceutical Services (PFPS) make the following comments as a submission in relation to FSANZ Application A1193 – Irradiation as a Phytosanitary Measure for All Fruits and Vegetables.

1. There is no objection for the permission to irradiate all fruits and vegetables as delineated in the Application.
2. However, there are strong arguments against agreeing with the permission to proceed with respect of this Application, namely with reference to Section 2.2.1 – Labelling of Irradiated Food; as follows:
  - (i). This Application (A1193) blandly states that labelling requirements are adequately addressed in Section 1.2.1-9 of *Australia New Zealand Food Standards Code* (ANZFSC).
  - (ii). Section 1.2.1-9, specifically subsection (3)(c) with reference to subsection (2), states that irradiated food that is not required to bear a label, must be labelled with the relevant information by a label or sign that accompanies the irradiated food or is displayed in conjunction with the display of the irradiated food.

In other words, the purchaser is informed that the food has been “treated with ionising radiation” (refer ANZFSC Standard 1.5.3-9).

(iii). Albeit anecdotal, I have not ever seen any fruits or vegetables or any packaged foods that make any statement re treatment with ionising radiation.

(iv). I am also unaware that any food enforcement agency has tested this lack of this particular labelling in a legal manner or court.

(v). A1193 does not provide any analytical method by which irradiated fruits and vegetables may be tested to determine whether they have been irradiated subsequent to harvesting and prior to entering the marketplace.

(vi). Such a method may be well known to specific analytical laboratories but it is suggested that a standardised method of analysis be designated.

(vii). The question is begged, but not addressed in A1193, as to the extent of the data and knowledge of the background, inherent levels of radiation that may be present in all the fruits and vegetables from all the geographical areas that may grow such fruits and vegetables and export this produce into Australia and New Zealand. Surely, this data is required to ensure enforcement may be conducted.

(viii). There are several other labelling requirements within ANZFSC that may be subject to enforcement but, again anecdotally, with little or no compliance by food producers/manufacturers and subsequent enforcement being conducted; e.g.

- Other currently permitted Irradiated Foods (Standard 1.5.3-9).
- Surface Coated Fruits and Vegetables – Schedule 15, section 4.1.2 lists a number of permitted Food Additives that should be displayed in conjunction with many market products (Standard 1.2.1-6 [when packaged, even in see-through packaging]; when unpackaged, there is a labelling anomaly that permits non-declaration and potential misleading of consumers).
- Genetically Modified Foods – Schedule 26 has a large number of permissions; that have occupied a lot of time, money and effort by FSANZ and others, such as AQIS; that appear to have not be used in Australian or New Zealand Foods, if correct and enforceable declaration and labelling is used as an indicator (Standard 1.5.2-4)
- Raw Meat joined or formed into the semblance of cut of meat; these types of products are often coated and are difficult to detect when not correctly labelled and hence breaches of labelling are difficult to enforce (Standard 2.2.1-8).
- Similarly, for formed or joined Fish (Standard 2.2.3-3).
- Etc.

3. Therefore, it is contended that if a mandated Standard cannot or will not be enforced, it is questioned as to whether such a Standard should be permitted.
4. It is appreciated that FSANZ is not responsible for enforcement of Food Standards.

I would appreciate being informed of any further information on this Application,

Yours sincerely,



Consultant

**Professional Food and Pharmaceutical Services**