



3 December 2020

Food Standards Australia New Zealand
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by email to submissions@foodstandards.gov.au

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

I wish to make comment on this Application on behalf of the Food Intolerance Network (FIN), which with 16,037 current members is probably the largest consumer organisation focused on food in Australia.

In consulting members, there was broad acceptance that phytosanitary irradiation does not pose any health threat in itself, and that phytosanitary irradiation causes negligible losses of micronutrients. The fact that irradiation replaces other fumigation practices that have known human health and workplace hazards and are ozone-depleting is a plus, although claims that this practice will lead to a reduction in other pesticides is not correct as irradiation is a post-harvest process used in conjunction with pesticides from planting through to harvesting.

We note that no other country in the world specifically call for the irradiation of apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, table grapes, zucchini, squash etc and wonder why Australian consumers should be used as guinea pigs for this even wider use of irradiation?

There are strong consumer concerns about the honesty and enforcement of irradiation labelling in Australia and NZ. It is not acceptable to use the term "treated with ionizing electrons" when in fact gamma radiation and not ionizing electrons are used. The term "cold sterilisation" is deliberately misleading and is not acceptable. Nor is the term "Radurised" or the use of the Radura symbol supported since these are greenwashing and not honest. The relevant Food Standard must be amended to say "irradiated" or "treated with radiation".

We note that in the EU any irradiated food or any irradiated food ingredient of a compound food must be labelled with the words "irradiated" or "treated with ionising radiation." In the USA and Canada foods or ingredients must have the statement "treated with irradiation" or "treated by irradiation." Australian consumers demand at least this level of protection. Codex Alimentarius requires that all irradiated foods be labelled.

From the point of view of consumers, the mandatory labelling of irradiated fruit and vegetables provides consumers with choice when it comes to purchasing or not purchasing irradiated fruit and vegetables. For us, it is essential that this labelling requirement is strengthened if there is to be a wider use of irradiation.

Regards

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The Food Intolerance Network provides independent information about the effects of food on behaviour, health and learning in both children and adults, and support for families using a low-chemical elimination diet free of additives, low in salicylates, amines and flavour enhancers (FAILSAFE) for health, behaviour and learning problems. ABN 72 705 112 854