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**From:** [REDACTED]  
**Sent:** Thursday, 24 December 2020 10:36 AM  
**To:** submissions  
**Cc:** [REDACTED]  
**Subject:** re: Submission For Project Number A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables

**Importance:** High

**Categories:** [REDACTED]

## ***Submission against the proposal for phytosanitary irradiation of all fresh fruit and vegetables***

I can understand FSANZ wants to use X-rays to sterilize food and make it biosecure. X-rays *will* definitely do that, but they will achieve that aim by destroying vital molecular structures in those insects, seeds, bacteria, or fungi thus irradiated.

However, if it holds true that X-rays *will* do that to the molecular structures within insects and microorganisms – to the point of destroying their ability to function – then why do we simply assume that exactly the same X-rays won't destroy the molecular structures of vitamins and other phytonutrients, and thereby equally destroying their capacity to function *as required within our bodies*?

Or, are you suggesting that *functional, non-damaged phytonutrients* play no role whatsoever in keeping us healthy? If you do, on what studies would you base such an assumption?

One can't simply assume that just because a technology has good results in one arena – such as food sterilization and preservation – that the same technology might not have significantly negative effects in other arenas – such as human health.

Obviously, X-rays simply aren't able to differentiate between potentially concerning agents in our food supply – like microorganisms, insects, etc. – and the crucial nutrients such foods supply to us humans.

To assume X-rays have the capacity for such discernment would be extraordinarily unscientific; in fact, it would be more reminiscent of a religious leap of faith. Something, indubitably, that should absolutely *not* occur within science!?

Beyond the requirements for air and water, food is surely the next most basic and utterly crucial input to our bodies, in order to keep us healthy?

Again, if X-rays **do** destroy molecular structures in microorganisms, etc. then there is scientific merit in stating that those same X-rays *will* destroy vital nutrients in our food, with many negative repercussions to human health over time.

To allay such deep concerns, can you point me to significant amounts of non-industry based, genuine, scientific *animal* studies – at least! – to prove that feeding animals irradiated food for their entire lifespan didn't cause overt or covert damage to that generation?

Plus, to be genuinely scientific about it, can you point me to reproduced animal studies conclusively proving that there were no problems in the F1 and F2 generations?

Again, at least 1-2 generations of irradiated food-fed animals need to be tested! (Remember DES – Diethylstilbestrol – which didn't cause problems in the original mothers, but sure did in the F1 generation?)

If intergenerational animal studies, fed irradiated foods, are not available, why would you simply assume that hard-irradiated food is safe for long-term *human* consumption? Again, there is nothing scientific about such an implausible approach!

Equally, think back about 50-60 years ago, when a form of X-ray machine was the latest fad in shoe stores, placed there to help people check for perfect fit of their feet to the shoes they were wanting to buy. I still remember as a young kid, battling with my siblings to get onto those machines, in order to see the bones in our feet dance around as we wiggled our toes.

Fun then, let alone endorsed by the shoe Industry, and no doubt by those manufacturing such machines. Now we shudder with horror at the amounts of cumulative irradiation a whole generation of kids – and adults – were exposed to for no other reason than it seemed a “good marketing idea” at the time.

Will we similarly look back at food irradiation via X-rays with total incredulity? And, what about the number of lawsuits and inevitable class-actions brought to bear on those who will be found to have pushed this proposed food irradiation technology onto an entire nation?

Just because a person may not immediately throw up after a meal made from hard-irradiated food, does not mean that any damage accrued isn't in fact a far more subtle process, taking months, years, or even generationally to finally manifest. Again, the historical fact of DES, and its horrific health consequences on the F1 generation, should stand as a dire cautionary tale.

If something as drastic as irradiating one of the staples to our human health – food! - is being considered, then surely, the onus is on those *proposing* such technology to prove beyond any reasonable doubt that such an intervention is indeed safe? The onus to supply evidence of harm should absolutely *not* be laid at the feet of the public who don't have access to labs capable of doing animal studies!

But, you do! And, if you haven't done the studies, then any further talk of irradiating our food supplies needs to cease forthwith, until such studies – replicated by non-Industry scientists! – materialize.

The reality is that we already know – via some studies submitted to FSANZ by the “Organics Industries” – that there *is* a clear cause for serious concern when it comes to dangers emanating from eating irradiated foods.

By the same token, in regard to further safety-checking such a drastic action to our national food supplies, can you equally show me studies – spectrographically, for instance – that there are no inadvertent by-products created in such irradiated foods, which in turn could cause harm to humans eating such food for the rest of their lives?

I presume, that in the process of getting this X-irradiation technology installed for our food supplies, that such studies as mentioned above have been done, as well as replicated by others, and that such studies also include those done by non-Industry based research.

This latter point is important, because we have scientific proof – through various studies done on Big Pharma “research”, for instance – that Industry-based research is inevitably far more biased toward positive outcomes beneficial to a particular Industry, than non-Industry-based research.

The other concern – as a potential forced consumer of future, hard-irradiated food – is the serious lack of transparency and the clandestine manner in which your organization has suddenly brought forward the closure date for public and other scientific comment or submissions. Originally the proposed timeframe for application [A1193](#) was to commence in November 2020, with public consultation taking place into April 2021.

Why the sudden rush? Especially, just before the Festive Season days kick in, when most people – already in overwhelm about Covid - are also seriously distracted by preparing for Xmas, etc.?

Getting this technological process of “food sterilization and stabilization” wrong will have serious repercussions to the health of those forced to eat such processed foods, and if no intergenerational studies have been done on animals, then we are in the serious situation of flying blind in regard to negative impacts on future, *human* generations.

The cost will also not just be to those initially subjected to eating irradiated foods. Those costs will also land on the collective heads our health systems, which are already struggling with an overload of chronic degenerative diseases.

Although I acknowledge that food irradiation may help in the food biosecurity arena, I urge your committee to be equally aware of the very real dangers posed by having a nation permanently fed irradiated foods, and the dire consequences this poses to human health, now and intergenerationally. The stakes are extraordinarily high, and the ramifications of making the wrong decision will be monumental.

[REDACTED]



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