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7 December 2020

Dear FSANZ

Submission to Food Standards Australia New Zealand re A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables

I am Associate Professor [REDACTED] a food systems expert at the Queensland University of Technology. I am the program leader of Agrifood Systems at the Centre of Agriculture and the Bioeconomy, a Council Member of the International Rural Sociology Association and Member of the Australasian Agrifood Research Network. I have published widely on the topics of food systems, including food safety, food security and food sovereignty. It is from this basis of expertise that I oppose:

- a) The changing of the date for public consultation without properly informing the public – particularly to a time when people are exhausted from the pressures brought about by adapting to a global pandemic, and preparing for end of year holidays and celebrations; and
- b) The blanket approval of irradiation for all fresh fruit and vegetables

In the first instance, I request that FSANZ act genuinely in the public interest and extend the public consultation period. The bringing forward of the original public submissions date from April 2021 to December 2020 appears a cynical, anti-democratic act to reduce the opportunity for public opinion to be voiced.

I personally have concerns about consuming irradiated food. I am also concerned that irradiated food will not be adequately labelled, and therefore lack the transparency expected by consumers to make informed choices about the food they eat.

I would also like more time to assess the social and environmental impacts of food irradiation and consult with my colleagues in social science, chemistry, biology and health disciplines. At this stage, given the change in the consultation period, I have not had the opportunity to appropriately weigh up the evidence for and against, and have to question why this is seemingly being 'rushed through'. In whose interests does this haste serve?

There are a number of valid reasons to not rush in a decision to irradiate fresh foods. As you would be aware, in 2003, concerns over the safety of irradiated food led the European Union to rule out further irradiation approvals. The Australian Senate followed suit with a call for approvals to be halted until further research has been conducted. Claims that

irradiated foods are safe do not appear to be defensible – by its nature, no long-term trials on the human consumption of an irradiated diet have been conducted. It is widely understood that irradiation may alter the dietary composition of food. Queensland Health acknowledge that “Vitamins A, B1 (thiamine), C, E and K in foods are relatively sensitive to radiation” (QH, 2018).

For the above reasons, I call on you to reject A1193 and to withdraw previous irradiation approvals. These issues are rarely in the public interest and it can be expected that a transparent and open debate would likely result in the removal of social licence for industrially derived foods.

Best wishes

[Redacted signature]

[Redacted name]

[Redacted contact information]

Reference:

Queensland Health, 2018, The Facts about Food Irradiation