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From: [REDACTED]
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To: submissions
Subject: Submission on A1193: Irradiation of all fresh fruit and vegetables

Categories: [REDACTED]

Submission on A1193: Irradiation of all fresh fruit and vegetables

Submission to: Food Standards Australia NZ (FSANZ)

Submission by: [REDACTED]
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First, we wish to thank you for the opportunity to make a submission on this important matter, so we can together achieve sound public health, food sovereignty, and other important positive outcomes.

A blatant conflict of interest exists in the Queensland government's being both the applicant for A1092 and a member of the Legislative and Governance Forum on Food Regulation (the Forum) and thereby one of the final arbiters of the decision on its own application. That conflict of interest alone is sufficient grounds for denying the application.

Equally or more important grounds for denial of the application stem from health and safety issues. The nutritional and safety assessment process lacks scientific rigour and relies heavily on unpublished, non-peer-reviewed studies submitted by the applicant.

The Food Regulation Review Process of FSANZ operates under an unambiguous legislated mandate to protect public health and safety. Approval of A1092 would not protect public health and safety.

FSANZ and the Forum have assessed A1092 in isolation from the proposal's dietary context, even though many scientists as well as members of the public have expressed concern that the proposed irradiation would cause a major reduction in the nutritional value and safety of the human food supply in both New Zealand and Australia.

In its cost/benefit analysis, FSANZ inflates the claimed benefits of approving A1092 while downplaying the known risks, costs, and hazards of irradiating apples, apricots, cherries, nectarines, peaches, plums, rockmelon, honeydew, strawberries, table grapes, squash, and zucchini – risks and hazards to which the whole community will be exposed.

No simple, reliable, and affordable test for irradiated foods exists, making it difficult for state and local authorities to monitor such foods in the marketplace and to enforce the labelling requirements. Despite FSANZ's claim, there is no reliable contemporary evidence that Australian and New Zealand consumers are aware of or will accept widespread irradiation of the nations' fresh fruit and vegetable supply.

Labelling requirements in Australia and New Zealand are famously and dangerously weak, and irradiated foods cannot be visually distinguished from non-irradiated foods. Shoppers must therefore depend on the integrity and comprehensiveness of irradiation labelling.

The absence of mandatory national statements for irradiation labelling is unprecedented in other English-speaking nations and in our trading partners. Mandatory labelling of individual products is the only mechanism that protects consumers' right to make fully-informed choices about whether or not they, their families, guests, pets, and livestock will eat irradiated foods.

Irradiated pet food killed, paralyzed, and sickened a substantial number of cats in Australia, leading to a ban on such products. Until the mechanisms of these adverse health impacts are fully explored and understood, and negative impacts on humans and other species are absolutely ruled out, irradiated foods must not be allowed to enter the human food supply.

The Legislative and Governance Forum on Food Regulation has failed in its duty to canvass all potential management, chemical, and technical options to replace fruit fly insecticides. These chemicals have been under APVMA review since the mid-1990s because of their known toxicity to humans. A thorough process to review all fruit fly control options must precede any further approvals to irradiate fresh fruits and vegetables. FSANZ has ignored the many effective alternatives to irradiation that already exist and can provide the stated phytosanitary goals of A1092.

The Forum and FSANZ have also failed in their duty to protect public health and safety by failing to implement a much earlier phase out of highly toxic fenthion and dimethoate in which fresh fruits and vegetables have been immersed to kill fruit fly larvae.

Neither the applicant nor FSANZ can claim approval of A1092 would be a mechanism for harmonization of trade regulations. No other country or state expressly requires irradiation of apples, apricots, cherries, nectarines, peaches, plums, rockmelon, honeydew, strawberries, table grapes, squash, or zucchini.

Despite the assessment's statement that the public has the right to know and decide what foods to purchase, proper labelling of all irradiated foods is not assured, as the Forum commissioned FSANZ to review (with the obvious intention of terminating) all labelling requirements on irradiated food products.

On behalf of our family, friends, and neighbours, we call on FSANZ to adopt option 2 and reject A1092 which seeks permission to irradiate apples, apricots, cherries, nectarines, peaches, plums, rockmelon, honeydew, strawberries, table grapes, squash, and zucchini on the following grounds:

- (1) the application and assessment are flawed in the ways discussed above, including but not limited to the issues enumerated below;
- (2) the safety of irradiated foods has not been established;
- (3) the nutritional value of irradiated foods has not been established;
- (4) specific need for the proposed irradiation has not been shown;
- (5) irradiation is not the only effective option for fruit fly control that exists or is currently in use;
- (6) the assessment has no cost/benefit analysis of other phytosanitary measures;
- (7) FSANZ must employ a whole systems approach that would guarantee the use of other approaches to quarantine solutions -- or would at least make such other approaches available and accessible;
- (8) A1092 offers no credible benefits to Australian or New Zealander consumers
- (9) approval of A1092 would unfairly and unnecessarily expose Australian and New Zealand consumers and food workers to increased risks, costs, and hazards;
- (10) only full and accurate labelling of irradiated food can support public confidence in the wholesomeness of Australian and New Zealand foods and the integrity of the food industry.

As a matter of urgency, and in the public interest, our family call on FSANZ to:

Decline approval for the irradiation of apples, apricots, cherries, nectarines, peaches, plums, rockmelon, honeydew,

strawberries, table grapes, squash, and zucchini;

To decline any further irradiation applications; and

To cancel all previous irradiation approvals.

Thank you again for this opportunity to submit our comments and recommendations on this application. With all best wishes, we are

Cordially yours,

[Redacted Signature]