

[REDACTED]

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

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**From:** [REDACTED]  
**Sent:** Thursday, 10 December 2020 3:00 PM  
**To:** submissions <[submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)>  
**Subject:** Submission on A1193 Irradiation of all fresh fruit and vegetables  
**Importance:** High

### **Application A1193 - Irradiation as phytosanitary measure for all fresh fruit and vegetables**

#### **RE: Application to amend Standard 1.5.3 of the Food Standards Code, Irradiation of Food, to include irradiation as a phytosanitary measure for all fresh fruits and vegetables.**

I recommend that FSANZ reject proposal **A1193** on the following grounds:

- Irradiation of any and all fresh fruits and vegetables, including but not limited to, all those fresh fruits and vegetables presently described within Schedule 22 of the Food Standards Code, plus any other fresh commodity generally understood to be a fruit or vegetable, including crops grown overseas that would adversely affect the nutritional value and safety of significant components of the Australian and New Zealand food supplies.
- Combined with fruits and vegetables already approved for irradiation, this proposal would constitute a major reduction in the nutritional value and safety of the human food supply in both countries, yet A1193 is being assessed in isolation from its total dietary context.
- Irradiated pet food was responsible for the death and injury of a significant number of cats in Australia, leading to its ban. 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, no irradiated foods should be allowed to enter the human food supply.
- The Queensland government has a clear conflict of interest by being both the applicant for A1193 and, as a member of the Legislative and Governance Forum on Food Regulation, being one of the final arbiters of the decision on its own application.
- The nutritional and safety assessment process lacks scientific rigour, relying heavily on unpublished non-peer-reviewed research submitted by the applicant.
- The Legislative and Governance Forum on Food Regulation (the Forum) has been derelict in its duty to canvass all potential management, chemical and technical replacement options to follow the final phase-out of 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 should precede any further approvals to irradiate fresh fruits and vegetables.
- FSANZ also ignores the numerous alternatives to irradiation that exist for achieving the stated phytosanitary goals of A1193.
- The Forum and FSANZ have been derelict in their duty to protect the public health and safety, by failing to facilitate the much earlier and more timely phase out of highly toxic dimethoate and fenthion in which fresh fruits and vegetables were dipped to control fruit fly larvae.

- In its cost/benefit statement, FSANZ inflates the claimed benefits of approving A1193 while diminishing the impacts of the known hazards, risks and costs of irradiating of any and all fresh fruits and vegetables, including but not limited to, all those fresh fruits and vegetables presently described within Schedule 22 of the Food Standards Code, plus any other fresh commodity generally understood to be a fruit or vegetable, including crops grown overseas that impacts that the whole community will bear.
- Labelling requirements are weak and there is no way to visually distinguish between irradiated and non-irradiated foods. Thus shoppers depend on the integrity and comprehensiveness of irradiation labelling.
- As there is no simple, reliable and affordable test for irradiated foods, it is difficult for state and local authorities to monitor them in the marketplace and to enforce the labelling requirements.
- Despite the assessment's claims that the public has the right to know and decide what foods to buy, the future labelling of all irradiated foods is not assured, as the Forum has commissioned FSANZ to review (with the intention of terminating) all labelling requirements on irradiated food products.
- Despite FSANZ's claim, there is no reliable and contemporary evidence that the Australian and New Zealand public are aware of, or will consent to, the widespread irradiation of the fresh fruit and vegetable supply;
- No other countries (or states) expressly require the irradiation of any and all fresh fruits and vegetables, including but not limited to, all those fresh fruits and vegetables presently described within Schedule 22 of the Food Standards Code, plus any other fresh commodity generally understood to be a fruit or vegetable, so approval of A1193 cannot be claimed to be a mechanism for harmonization of trade regulations.

**I call on FSANZ reject A1193 which seeks permission to irradiate of any and all fresh fruits and vegetables, including but not limited to, all those fresh fruits and vegetables presently described within Schedule 22 of the Food Standards Code, plus any other fresh commodity generally understood to be a fruit or vegetable, including crops grown overseas.**

**The grounds for my recommendation are:**

- the safety and nutritional integrity of irradiated foods is not established;
- the application and the assessment are flawed in the ways we discussed above;
- the technological need for this irradiation has not been established;
- irradiation is not the only effective option for fruit fly control that exists or is used now;
- the assessment has no cost/benefit analysis of other phytosanitary measures;
- FSANZ must ensure a whole systems approach is used that would guarantee - or at least make accessible – other approaches to quarantine solutions;
- A1193 offers no credible benefits to Australians or New Zealanders;
- if A1193 were approved, the Australian and New Zealand public would be unfairly and unnecessarily exposed to further risks, costs and hazards;
- exporting of any and all fresh fruits and vegetables, including but not limited to, all those fresh fruits and vegetables presently described within Schedule 22 of the Food Standards Code, plus any other fresh commodity generally understood to be a fruit or vegetable, may expose local growers to greater competition from imported produce, further reducing or wiping out local production;
- if further fresh foods were approved, only full, honest irradiated food labelling would support public confidence in the wholesomeness of Australian foods and the integrity of the food industry itself.
- As a matter of urgency, and in the public interest, we call on FSANZ to:
  - **Decline approval for the irradiation of any and all fresh fruits and vegetables, including but not limited to, all those fresh fruits and vegetables presently described within Schedule 22 of the Food Standards Code, plus any other fresh commodity generally understood to be a fruit or vegetable, including crops grown overseas;**

- **Refuse any further irradiation approvals *and to*;**
- **Cancel all previous irradiation approvals.**

I may be contacted for additional comments/feedback as needed.

Thank you



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