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**From:** [REDACTED]  
**Sent:** Thursday, 10 December 2020 2:24 AM  
**To:** submissions  
**Cc:** [REDACTED]  
**Subject:** Submission RE: A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables  
**Categories:** [REDACTED]

To: Food Standards Australia New Zealand

I am shocked to hear that FSANZ has changed the date of public consultation on this important matter which was to take place next year- in early April 2021, without properly informing the public, so I ask that you extend the public consultation period, as there are many health conscious citizens quite concerned with irradiation and who should be given more opportunity to make a submission.

I oppose the blanket approval of irradiation for all fresh fruit and vegetables as it depletes the vitamin and nutritional content of food as well as the environmental impacts of irradiating. Numerous alternatives to irradiation exist and I do not believe that the irradiation of these fruits for quarantine purposes will benefit my health. I am also worried that irradiated food will not be adequately labelled.

In 2008-9, 87 Australian cats died or were paralysed after consuming irradiated cat food, and it was concluded that the illness was cat specific, despite a lack of solid scientific evidence for this claim. Irradiated cat food is now banned in Australia.

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 European Food Safety Authority acknowledges that the risk to humans cannot be ruled out.

In 2003, concerns over the safety of irradiated food led the European Union Irradiation 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 are indefensible as no research on long term consumption of an irradiated diet have been conducted.

Numerous studies have shown the potential health risks posed by irradiated food, and the approval of regularly eaten fruit and vegetables could significantly increase the amount of irradiated food in our diet.

Irradiation has been shown to deplete vitamin C, vitamin A, proteins, essential fatty acids and other nutrients in food and has been linked to health problems such as nutritional deficiencies, immune system disorders, abnormal lymph cells, and genetic damage.

While irradiation is promoted as beneficial to Australian farmers; each approval will also enable irradiated imports from overseas.

It is a tool of large agri-business – and supports mass production systems that diminish the power of local food producers and destroy local markets.

Irradiation is not an alternative to chemical treatments and will not eliminate the use of chemicals and pesticides in crop production; it will be used in conjunction with these and other food processes.

At best, irradiation may substitute for some post-harvest chemical treatments. However, the food most likely to be subject to irradiation is food produced using conventional agricultural processes - which today means using chemicals and pesticides and possibly GMOs from seed development through harvesting.

There is no technological need for irradiation as numerous alternatives exist, such as pest-free zones, physical disinfestation and organic agriculture.

Finally, I am not at all confident that these fruits will be adequately labelled. This will lead to foods being marketed as “fresh” though they are processed. Irradiated food and their packages must be **individually** labelled “treated with radiation” or “irradiated.” A1092 does not assure me that this will be the case.

For these reasons I call on you to reject A1193 and to rescind all previous irradiation approvals. I look forward to hearing your response to my concerns.

Thank you for your consideration.

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