PO Box 10232, The Terrace,
Wellington 6143
Level 4, Cooperative Bank House
20 Ballance Street, Wellington 6011
Phone: +64 4 472 3795
Fax: +64 4 471 2861
Web: www.hortnz.co.nz
Email: info@hortnz.co.nz

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Submission on Application A1069
Irradiation of Tomatoes & Capsicums

Submitter: Horticulture New Zealand Incorporated

Submitted by: Peter Silcock, CEO

Contact Details: P O Box 10232, The Terrace, Wellington 6143, New Zealand
Ph +64 4 472 3795
Fax +64 4 471 2861
[redacted]

Introduction

Horticulture New Zealand (HortNZ) represents the interests of 5,500 commercial fruit and vegetable growers throughout New Zealand. This includes growers of tomatoes and capsicums.

HortNZ has taken a keen interest in the changes to approved biosecurity treatments in Australia, principally due to our concerns about the adequacy of biosecurity treatments (primarily considered by the Ministry for Primary Industries in New Zealand) and the potential impacts any new treatment will have on consumer perceptions and behaviour.

We have four major issues we wish to focus on in these submissions:

- issues around consumer choice and labelling;
- the technical justification for the application;
- the impacts on nutrition and vitamin content; and
- issues around the assessment impacts.

Executive Summary

1. We strongly support either product or point of sale labelling of irradiated product to provide consumer choice.

2. The application is not technically justified, based on:
    - That alternative measures are (pest free areas), or will be (full strength methyl bromide), available to the Australian industry in time for the 2013 season.
    - The fact that the Australian industry has known for some time about the probable loss of the diamethoate treatment option and has failed to establish other options should not be used to justify the approval of this treatment.

3. While the impact on nutritional and vitamin content may be small, this approval sets a new benchmark as tomatoes in particular are a significant part of our diet.

4. In recommending labelling of product to provide consumer choice, the proposal and assessment have failed to address the fact that a significant proportion of tomatoes (especially) are consumed via the catering, restaurant and institutional channels. No consideration has been given as to how these consumers will be informed that the products they are being offered/are eating are irradiated.

5. The assessment of the potential negative impacts on industry is cursory and inadequate. For example, the impacts on industry in terms of a negative consumer response to irradiated product and potential market share loss has not been researched or assessed.

6. The cost of Government enforcing labelling requirements has not been included in the assessment.

Detailed Comments

Consumer choice and labelling
HortNZ strongly supports the need for mandatory labelling of irradiated tomatoes and capsicums (as outlined in section 3.2) to provide informed choice for consumers.

HortNZ is however concerned about the enforcement of existing mandatory labelling requirements for irradiated tropical fruit in New Zealand. It appears to us that the current regime around tropical fruit is not well enforced and therefore consumers are not receiving the information as agreed by FSANZ.

While mandatory labelling is effective in a conventional retail and supermarket channel, past experience has shown that up to 20% of Australian tomatoes imported into New Zealand go into the catering, foodservice, fast food, hotel and institutional channel. FSANZ needs to extend the labelling requirements to menus and other consumer information (such as websites) in this situation to ensure the provision of "*adequate information relating to food to enable consumers to make informed choices*" as referred to in section 3.2.2.2 of the report.

The technical justification for the application
HortNZ believes that the application lacks technical justification about the need for the treatment.

We do not support the view expressed in Section 3.1 of the application that because FSANZ has previously established the need to irradiate other fruit then there is a need to irradiate tomatoes and capsicums.

Section 3.1.1 is not correct in stating that "*Disinfestations of tomatoes and capsicums by irradiation is a valid treatment for quarantine purposes…*" HortNZ's understanding is that this issue will be ultimately determined by other authorities and that no decision has been made on this. In making this statement at the outset of the assessment, FSANZ is simply making an assumption about technical decisions it has no expertise or jurisdiction in.

FSANZ needs to prove conclusively that the "*technical need*" for the treatment is critical to its consideration of this application; it should not be based on the assumption above. However, even if the efficacy of irradiation for disinfestations purposes is confirmed, that does not alone satisfy the "need" for the treatment.

The question of "*need"* relates also to the consideration of alternatives that are available. Alternative options are available to the Australian tomato industry including the existence of "pest free areas" and it is our understanding that the industry is also very close to establishing a methyl bromide treatment option as well. Given these alternative options, we do not believe there is a demonstrated "*need*" for the irradiation treatment, particularly as it is likely to be a more expensive treatment option and these costs will be passed on to consumers. There would almost certainly be a degree of consumer resistance to irradiated product.

In a number of areas the assessment makes mention of the need for irradiation to replace the dimethoate treatment that has now been suspended. The Australian industry has known for many years now of the apparent withdrawal of dimethoate. The fact that the industry has not proactively sought to establish alternative treatments in a timely way should not be used as justification today for the "need" for irradiation.

Section 3.2.1.2, Paragraph 2 refers to the possibility of product shortages if the application is not approved. Given that alternative treatments will be available, this is not a likely outcome during the next Australian export season.

Section 3.2.2.4 states "*Approval to irradiate tomatoes and capsicums will promote consistency with other countries*…" HortNZ is not aware of any other countries where irradiation of tomatoes and capsicums is approved.

The impacts on nutrition and vitamin content

While we accept that changes to nutritional and vitamin content caused by irradiation of tomatoes and capsicums poses no human health risk we are still concerned that treatment will reduce the levels of these beneficial compounds.

Many consumers choose to eat fresh produce due to the positive health benefits and the industry invests a substantial amount of funding to promote these. It is critical that this aspect of our industry is protected.

FSANZ will be aware that there is a reasonably significant level of consumer pushback towards irradiated products. The fact that this application includes two products that constitute a significant portion of our overall dietary intake is very significant. Based on consumer spend tomatoes are the second most popular vegetable in New Zealand and capsicums are number 7.

The assessment document in section 3.1.2, dot point 3, refers to the effects of irradiation being less than those associated with cooking. The key point we would make is that by far the majority of people that buy fresh tomatoes plan to eat them in a fresh ripe state when the nutritional value is at its highest. With irradiated food this nutritional level is compromised.

Issues around the assessment of impacts of proceeding

HortNZ does not believe that adequate assessments of some of the negative aspects of proceeding with the application have been considered including:

- consumer resistance to irradiation may have negative impacts on the market share of sales of all tomatoes and capsicums;
- additional costs for growers not using irradiation to differentiate their products;
- additional costs for retailers to provide labelling at the point of sale; and
- additional costs for Government to enforce labelling requirements.

Ends