



Horticulture Access Solutions Pty Ltd
to markets through science

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Standards Management Officer
Foods Standards Australia New Zealand
Canberra ACT 2610

By email

Submission in support of Application A1069 - Irradiation of tomatoes and capsicums

Dear Standards Management Officer

Horticulture Access Solutions P/L is writing in support of A1069 - Irradiation of tomatoes and capsicums.

As described in the Application, the Call for submissions document and Supporting Document 2 – Risk and technical assessment report, irradiation will provide the tomato and capsicum growers with an additional and cost effective alternative quarantine treatment. This is timely and important given that the APVMA have suspended the use of dimethoate as a post harvest treatment for tomatoes and capsicums and have proposed to suspend the use of fenthion as a post harvest treatment for tomatoes and capsicums.

Comments on supporting document 1;

AUSVEG, the Australian vegetable industry body, undertook research into consumer attitudes to fruit flies and fruit fly treatments in 2012. This research was presented to industry in April / May 2012 and can be found at
<http://ausveg.businesscatalyst.com/rnd/Dimethoate%20and%20Fenthion%20Road%20Show/AUSVEG%20D%20F%20Road%20Show%20%20Market%20Research.pdf>.

Comments on Call for submissions document / draft variation to Standard 1.5.3, Irradiation of food;

Clause 3 (b) of 1.5.3: Other food safety regulators have approved an energy level not exceeding 7.5 mEv. FSANZ may wish to consider amending 3 (b).

Clause 6 of 1.5.3, Labelling: Considering the post harvest quarantine treatments of fresh fruits and vegetables; insecticides, heat and cold treatment, fumigation and irradiation, labelling is only required for irradiation.

There are human health concerns with the insecticides, the fumigant is being restricted as an ozone depletor and the nutrition impact from phytosanitary irradiation is similar to that from heat and cold treatments. Consumers may be interested to be informed about the human health concerns with insecticides, that the fumigant used is an ozone depletor and that heat and cold treatments may have an equivalent impact on nutrition.

FSANZ may wish to consider whether it is good policy, or enables consumers to make informed purchase decisions, to only require consumer labelling for irradiation and not require equivalent labelling for insecticides, fumigants or thermal treatments.

Generic approval of irradiation as a phytosanitary treatment: FSANZ may wish to consider whether the present product by product assessment process is going to result in a good, cost effective, public policy outcome, or whether it is appropriate and timely to undertake a generic assessment of irradiation as a phytosanitary treatment for fruits and vegetables as has been done by WHO CODEX and the US FDA.

CEO