

7 November 2012

Project Manager  
Application A1069  
Food Standards Australia New Zealand  
PO Box 7186  
Canberra BC ACT 2610

Dear sir/madam,

**Application A1069: Irradiation of Tomatoes & Capsicums  
Calls for Submissions**

This is in response to the Call for Submissions in relation to Application A1069 – Irradiation of Tomatoes & Capsicums.

By way of background, the Food & Beverage Importers Association (FBIA) is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia

FSANZ is proposing to add tomatoes and capsicums to the Table to clause 4 of Standard 1.5.3 – Irradiation of Food, with the result that the irradiation of tomatoes and capsicums with a minimum dose of 150 Gy and a maximum dose of 1 kGy would be permitted. The FBIA strongly supports the draft variation to the Code proposed by FSANZ.

Our support for the proposal is based on these considerations:

1. Tomatoes and capsicums are potential hosts to fruit flies and other regulated pests and so, effective phytosanitary treatments are essential for international and domestic trade in tomatoes and capsicums.
2. There is a need for an effective and cost efficient alternative to the two commonly used insecticides (dimethoate and fenthion) on tomatoes and capsicums. Reviews of these chemicals by the Australian Pesticides and Veterinary Medicines Authority (APVMA) have resulted in their use on tomatoes and capsicums being restricted, suspended or withdrawn.

**Food & Beverage Importers Association**

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Response to Call for Submissions*

3. Irradiation is recognised as an effective and legitimate phytosanitary treatment by the International Plant Protection Convention (IPCC) and biosecurity agencies in Australia, New Zealand and the United States of America.
4. Without permission in the Food Standards Code for irradiation of tomatoes and capsicums, it would be pointless to apply to biosecurity agencies for specific acceptance of irradiation as an effective and efficacious treatment to meet biosecurity and quarantine concerns.
5. The risk assessment conducted by FSANZ shows that irradiating tomatoes and capsicums as permitted by the draft variation to the Code would not pose a human health risk for consumers in Australia or New Zealand.
6. Permitting the irradiation of tomatoes and capsicums will allow domestic and international trade in tomatoes and capsicums to continue without disruption.

In view of the above matters, we believe Option 1 meets the objectives set out in Section 18 of the Food Standards Australia New Zealand Act 1991 and therefore, should be adopted.

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Yours faithfully,

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A J Beaver  
Director