



CONSUMERS SA

[CONSUMERS' ASSOCIATION OF SOUTH AUSTRALIA INC.]

Member of Consumers' Federation of Australia Inc.

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To:- FOOD STANDARDS AUSTRALIA NEW ZEALAND

Email: submissions@foodstandards.gov.au

From: Consumers South Australia (CSA)
P.O. Box
Belair, S.A..

Date: August 2nd, 2016.

**Re: SUBMISSSION ON APPLICATION A1115:
IRRADIATION OF BLUEBERRIES AND RASPBERRIES**

The Consumers Association of South Australia (CSA), is the consumers' voice in South Australia. It is a community-based, nonprofit organisation that represents consumers' interests, encourages the dissemination of information on issues affecting consumers, provide a forum for discussion of those issues and lobbies on them to all levels of government.

CSA's agenda focuses on South Australian consumers, but it is based on national Consumer Policy developed by the Consumers Federation of Australia (CFA) for consumer policy throughout Australia. The agenda has three key themes:

1. Consumers should be placed at the centre of all decision-making that affects their interests;
2. Consumers should have ready access to information, advice, assistance and avenues for dispute resolution and
3. Specific problems in particular industries should be fixed.

In this submission we are particularly addressing putting consumers at the centre of decision-making and having access to information important to them. Consumers have the right to be heard but their voices are often drowned out on specific issues by those who may have a financial interest in progressing a particular issue. Where this happens, government decisions maybe taken that are counter to consumer interests and ultimately counter to the interest of the whole community. Consumer interests therefore must be given due weight in any policy/ decision making.

CSA's concerns centre around the following points:

1. **An expansion to the number of foods already being irradiated when it is obvious from previous applications made to the Authority that consumers generally do not want their food irradiated.**

When food irradiation was first mooted there was a ground swell of consumers who did not want their food treated in such a manner. It is a technology which may be used to tidy up unsanitary practices. At that time, it was a trade-off to consumers' concerns that there be a clear label on foods that were irradiated so that consumers had the choice of whether or not to purchase them. The passage of time

since the Standard was brought in does not mean that consumers are any less concerned about food irradiation and its implications.

2. A review with a view to removing a label to adequately advise consumers that a particular product has been irradiated.

In line with our second policy that consumers should have ready access to information, it is essential that there be accurate, complete and honest labelling to enable consumers to make an informed choice as to whether or not they will purchase a product. It is also deceptive for a product that has been irradiated to be labelled "Fresh" or even to be placed in a situation where it may be assumed that it is fresh such as amongst other truly fresh fruit and vegetables. This amounts to deception by omission.

IRRADIATION IS A PROCESS and irradiated foods are processed foods. The changes made to foods through irradiation are substantial but they cannot be detected by the consumer. Consumers must be able to differentiate between foods that are fresh and foods that are irradiated, and the only way they can do this is by truthful labelling.

3. The loss of nutrients from foods considered to be in the 'superfood' category.

Over the last few years research has shown the value of anti-oxidants in the diet and how essential they are for good health. Foods that have high colouring, such as berries, are usually rich in anthocyanin, antioxidants and vitamins. The irradiation process produces free radicals which are damaging within the body. Both micro and micronutrient changes in food take place when food is irradiated, depending upon the composition of the food, on the dose of the irradiation and upon transport and storage conditions.

4. The introduction of an unnecessary process when there are other more benign alternatives available that can control insect infestation.

As stated above, irradiation can be used to clean up food which might not be fit for human consumption and to cover up poor management practices and sometimes to reduce costs. Irradiated spices are a case in point. In fact irradiation may not always be fit for animal food either as it has been reported that in 2008-2009 cats in Australia suffered neurological disorders linked to eating irradiated cat food. CSA understands that the cat food is now banned, but the cases are unresolved. Why would Australia want to take such a risk with food for human consumption? Quite apart from the nutritional loss irradiation causes, there is Australia's reputation as being a clean, green food market to be considered. It has been said that irradiation is an alternative to the use of certain pesticides which have been restricted. However the likelihood is that irradiation, being the last step before market, will be used as *well* as any pesticides used in the cultivation of the particular food.

CSA also understand that blueberries and raspberries may be subjected to ionising radiation at doses ranging from 150 Gray (Gy) to 1 kGy which is the energy equivalent to approximately 1.5 - 10 million chest x-rays. It would be interesting to ascertain the remaining nutrient levels in the fruit after treatment, compared to beforehand.

5. The Food Forum.

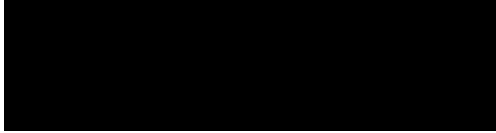
This body consists of State, Territory and Country, (including New Zealand), Health ministers, and makes the ultimate decision on these policy matters. As the New South Wales Government has made this latest application to irradiate blueberries and raspberries, it would seem to be a conflict of interest for the health minister in that state to be sitting on the body that will be making the final decision.

Food Standards Australia New Zealand have in the past stated that they label for health and safety reasons but not simply for other consumer information, but this is incorrect. Such processes as 'pot set' yoghurt, homogenised milk and Halal for example, are clearly labelled and all are processes. Foods that have been irradiated, which is also a process, should also be labelled.

In this state, South Australia, there is presently a large debate going on about the nuclear industry per se and whether South Australia should become a nuclear waste repository. A Commission has been conducted and now public consultation is taking place. Consumers are not, in the main, fully embracing of nuclear energy and the use of radioactive materials. In view of this, they may be forgiven for thinking that the push to irradiate even more food, is an attempt to further legitimise an unpopular nuclear industry.

Consumers SA thanks you for allowing us to present our views on this application, which in the public interest, should be rejected.

Yours sincerely,



Ian D. Butterworth,
Acting President,
Consumers S.A..



c.c. SA Minister of Health