

4th August, 2016

Christine Bennett

[REDACTED]

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To: Food Standards Australia New Zealand

Email: submissions@foodstandards.gov.au

Dear FSANZ Administrator

RE: Submission on Application A1115: irradiation of Blueberries and Raspberries

Please accept the following submission, as per below, and note that I strongly OPPOSE irradiation of Blueberries and Raspberries and entirely reject this application.

BACKGROUND:

This application on blueberries and raspberries has numerous issues of concern, as provided in this submission. FSANZ will recognise that the submission process is time-consuming. A vast majority of the general public are so engrossed with the responsibilities of daily survival that the time required to petition is usually forgone. I suggest that the general public may feel overwhelmed by the constant barrage of assaults on our food, whether we respond to submissions or not. Applications to FSANZ, such as A115, are a source of ongoing angst to consumers who are legitimately concerned about irradiated produce. Many consumers feel that our rights are not well defended by FSANZ. When consumer choice becomes eroded, restrictions to more limited options do not serve us well.

CONSUMER RESISTANCE:

As individuals we make daily decisions on food choices. Market forces in the sales of organic produce reflect consumer trends that march against the dictum of Government on our perceived 'best interests'. Such decisions are rightly subject to public scrutiny and often found highly questionable in any ethical sense. Therefore, one may ask: Should authorities such as FSANZ entertain a blinkered response to public discontent and maintain an inbuilt immunity that is wholly disconnected from preferences favoured by the target customer?

Some consumers believe this is happening already. Particularly, since FSANZ is currently reviewing food labelling with a view to removing present requirements, so that consumers will be unable to tell fresh fruit from irradiated product. The insidious nature of this non-disclosure is tantamount to treating consumers with the most blasé contempt. As a consumer, I strongly object that my right to select clean food, in preference to products I consider to be toxic, may be readily dismissed as irrelevant.

HEALTH CONCERNS:

In a world becoming more and more health conscious, irradiated foodstuffs are more frequently rendered visible on the social media radar. Consumer distress is translated into boycotting of such products. Market trends show that many customers are prepared to pay higher prices for organically farmed food. The purpose of irradiating blueberries and raspberries is the preservation of fruit to give a longer shelf life. When consumers are resistant the berries are likely to be sitting on the shelf for longer than anticipated. Soft fruits are particularly susceptible to spoiling. Irradiated berries provide a deceptive appearance of freshness, so there are greater risks of food poisoning when the prolonged shelf life is over-estimated. This issue of consumer welfare should be highly concerning to FSANZ. Further, the rebounding effects of consumer reaction should be noted as disadvantageous to those primary industries supported by FSANZ.

I further object for the following reasons:

- **Public discontent and consumer distress:** for every one of us who responds to the submissions process, please be aware, FSANZ, that there are many thousands more who will take personal action through consumer choice.
- **Health conscious or not, most customers want fresh clean food, as opposed to stale, irradiated foods that are considered inferior and, we believe, pose a range of consumer health risks.**
- **Consumers consider that we are the better advocates of our own best interests.**
- **It is not in the 'public interest' for FSANZ to (a) approve irradiation of food OR (b) ensure lack of transparency in consumer labelling of irradiated foods by non-disclosure of product.**
- **Failure to provide full disclosure by labelling of irradiated products would clearly indicate that FSANZ treats consumers with the utmost contempt. In view of existing public apprehension of the function and role of FSANZ, this loss of goodwill may not be a wise public relations exercise.**
- **Ingestion of radio-nucleotides is known to be carcinogenic: free radicals contaminate irradiated produce and food products.**
- **Effective methods of food preservation are currently available: the market does not require irradiation to achieve this effect.**
- **Blueberries and raspberries are considered natural 'superfoods'. Food purity and quality is important to consumers. Those who buy these berries want uncontaminated product that offers the benefits of Vitamin 'C' and antioxidants that are, otherwise, destroyed by irradiation.**
- **Consumer resistance to irradiated product may, ultimately, lead to increased wastage of product and subsequent loss to primary producers and associated outlets.**
- **Contamination through excessive shelf life or storage practices poses a range of subsequent risks to community health; a financial burden of costs; and the loss of public confidence in business integrity and reputation. Since the general public are already wary of recent evidence of contamination, irradiation may place a further 'nail in the coffin' of market sales in blueberries.**

FULL DISCLOSURE OF IRRADIATED PRODUCE ON LABELS:

Consumers MUST have the right to make personal choice based being fully informed of our options. To do otherwise would be an infringement of our democratic rights. As a society, it is inevitable that we will be exposed to radiation in the course of medical and dental treatments. Health professionals take every precaution to maintain reduced radiation exposure to the general public and as a personal measure. That this observance is also regarded as obligatory, within health policy guidelines, should register as a red flag to FSANZ, as an intrinsic responsibility towards public health.

Exposure to radiation in essential medical care is unavoidable but further contamination by irradiated foods is far from being necessary or conducive to sound community health. Nor is it in line with consumer expectations that the food we ingest to sustain us should be as pure as possible. As members of the Australian public, we reserve our rights and options to ensure that what we eat is good for us. It should be understood that the community do not accept the autocratic dictates of any industry or government controlled entity to decide what we ingest. Consumers want food labels to provide full information on irradiated produce! So, FSANZ, please abandon this retrograde and ill-advised concept of non-disclosure: it is transparently indefensible to force a population to eat irradiated foods by default.

CONCLUSION:

I believe that this application is entirely contrary to the public interest and I urge FSANZ to reject this application. Neither should the full declaration of irradiated produce, in clear labelling, be compromised through the subterfuge of non-disclosure.

I buy Australian blueberries and raspberries. I currently have a packet of frozen blueberries in my freezer. In making an informed choice, I validated that these berries were not irradiated. Along with a great many other health-conscious consumers, I am vigilant because I DO NOT want my food irradiated. As a regular purchaser of both fresh and frozen berries, I request FSANZ uphold labelling laws that provide full disclosure of irradiated foodstuffs.

I request that my rights as a consumer to be respected. I want to KNOW what I eat: therefore, preservation of informative labelling laws is an issue of importance to me. These laws support and preserve the democratic rights of every consumer in Australia. So, FSANZ, please validate consumer rights and reject Application A1115: irradiation of Blueberries and Raspberries.

Regards,
Christine Bennett