

## submissions

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**From:** Friends of the Earth NZ <foenz@kcbbs.gen.nz>  
**Sent:** Wednesday, 10 August 2016 3:43 PM  
**To:** submissions  
**Subject:** Submission A1115 Irradiation of Blueberries and Raspberries

To: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

My name is Robert Ernest Tait. I am a co-director of Friends of the Earth(NZ) {FoE(NZ)}. Our mailing address is - Friends of the Earth(NZ), PO Box 5599, Wellesley St, Auckland 1141, New Zealand. Our office phone is (0064-9-3609149) and our email is <[foenz@kcbbs.gen.nz](mailto:foenz@kcbbs.gen.nz)>. I am making this submission on behalf of FoE(NZ).

I was a member of the NZ Government Working Party on Irradiation Issues that was set up in the 1980's. The outcome of that Working Party was that the NZ Government banned the sale, import and export of irradiated foods. This established NZ as the first country in the world to institute a total ban on the irradiation of foods. It is only since ANZFA was established and NZ only got one vote compared to a vote for each Australian State and Capital Territory, that the NZ ban on irradiated food was thus overturned.

Our submission is to reject the Application A1115 and thus to not approve the irradiation of blueberries and raspberries. Both these are fresh foods that are generally eaten in a raw non-processed state. Blueberries particularly are renowned for high antioxidant levels. These provide an excellent natural protection food against free radicals and these berries should not be exposed to ionising radiation, which causes the production of free radicals in the berries.

It is important to realise that the efficacy to damage insect pests by exposing foods to ionising radiation is achieved by the applied high energy radiation breaking stable molecular bonds within the foods, and the consequent creation of free radicals. It is by this mechanism that the DNA of the unwanted insect pests is damaged by the free radicals. It is no more possible to restrict the free radical production only to the insect pests than it is to turn a light on in a room and expect it to illuminate only selected objects, and to leave other exposed objects unlit. Only idiots or science deniers would believe otherwise.

Thus to claim, as is set out in the FSANZ documents supporting this application, that the ionising radiation can be applied to the berries at a level that will damage unwanted insect pests DNA, and yet not adversely affect the wholesomeness of the berries themselves is neither credible nor true.

The vitamin levels will be damaged and the production of free radicals within the berries will be increased. To glibly claim that vitamin levels are also reduced by other forms of food processing is not relevant, given that almost always consumers eat these berries as fresh unprocessed foods.

There is no proper consideration of the radiolytic production of free radicals and their consequences in the FSANZ documents supplied with this application. Nor is there any acknowledgement of the serious causative contribution of the radiolytic free radicals that caused so much damage to the nervous systems of the cats that suffered after consuming irradiated cat food.

It is almost unbelievable that following that cruel disaster, that the irradiation of cat foods was banned in Australia, yet FSANZ continues to blithely and irresponsibly to promote and approve even more irradiation of human foods.

There is also the important issue of informed consumer choice. In NZ, we have witnessed the sale of irradiated Australian mangoes without any labelling, and more recently the sale of irradiated Australian tomatoes which were not only not labelled as irradiated, but were falsely labelled as NZ tomatoes. We reported this to Horticulture NZ, who in turn took it up with the NZ Ministry of Primary Industry. They visited the point of sale and confirmed that this was the case, but did not impose a prosecution, but merely issued

a warning. In fact, in spite of multiple exposure by FoE(NZ) of illegal sale of irradiated foods here, including national media coverage, there has not even been a single attempt of a prosecution by any authority or regulator.

We have no confidence that if irradiated berries are imported into NZ, that they will be labelled as required under our Food Regulations. In some cases, where a label was present on an irradiated mango, the writing that indicated that the food had been irradiated was in lettering so small that the consumer would need to have a magnifying glass to be able to read the label. The letters on these labels are no wider than the thickness of the thin wire that is used in a common paper clip. It is a farce.

For the above and other reasons, we request that FSANZ do not approve the Application A1115, irradiation of blueberries or raspberries.

Bob Tait  
Co-director FoE(NZ)