



9 August 2016

Food Standards Australia New Zealand  
Boeing House  
55 Blackall Street  
BARTON ACT 2600

Submitted via the FSANZ website

### **A1115 – Irradiation of Blueberries & Raspberries [16-16]**

The Australian Food and Grocery Council (AFGC) welcome the opportunity to make this submission in response to Food Standards Australia New Zealand (FSANZ) call for submissions on *Application A1115 – Irradiation of Blueberries & Raspberries* (“the Application”).

### **Overall Position**

The AFGC **supports** Option 1: prepare a draft variation to permit the use of irradiation for blueberries and raspberries.

The AFGC support is on the basis that:

- food irradiation fulfils its intended technological function and is an appropriate and efficacious treatment for fruit fly for quarantine purposes; and
- there are negligible risks to public health and safety associated with the consumption of blueberries and raspberries which have been irradiated at up to a maximum of 1 kGy.

### **General Comments**

#### **Review of the mandatory labelling of irradiated food**

The AFGC understands the scope of the current Application does not include an assessment of the need for the mandatory labelling requirement for all irradiated food to continue and that this is being dealt with under the FSANZ review of Standard 1.5.3.

In relation to labelling review, the AFGC:

- **Supports FSANZ** in undertaking a review of the regulation of food irradiation;
- Considers **a proposal should be instigated** to progress such a review;
- Recommends, in relation to the current requirements to gain pre-market approvals for irradiation, that a more **risk-based approach** be implemented that recognises the inherent safety of the process when used according to good practice, which recognises comparable economy approvals and which reserves pre-market



---

assessment by FSANZ for novel or extreme uses of irradiation as a sterilization process; and

- In relation to current requirements for labelling, that FSANZ recognise that current labelling requirements are 'alarming and off-putting', promote confusion and inappropriately single out irradiation as a sterilisation process, and therefore –
- Consider **whether the required language remains appropriate**; and
- Consider whether manufacturers should have the option of **providing information to consumers through extended information channels** other than product labels.

Thank you for the opportunity to provide this input to FSANZ. If you require any further information, please do not hesitate to contact me.

Sincerely

[Redacted signature]

[Redacted name]

Advisor, Policy and Regulation

[Redacted contact information]