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**SUBMISSION ON  
FOOD STANDARDS AUSTRALIAN AND NEW ZEALAND APPLICATION TO AMEND  
STANDARD 1.5.3 IRRADIATION OF FOOD OF THE FOOD STANDARDS CODE TO  
INCLUDE RASPBERRY (RUBUS IDAEUS) AND BLUEBERRY (VACCINIUM  
CORYMBOSUM, VACCINIUM STRIGOSUS, VACCINIUM ANGUSTIFOLIUM, VACCINIUM  
VIRGATUM V ASHEI)**

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**EXECUTIVE SUMMARY**

1. Horticulture New Zealand (HortNZ) represents the interests of New Zealand's 5,500 commercial fruit and vegetable growers. The horticulture industry is valued at over \$5.5 Billion including over \$3.5 Billion in exports.
2. The industry relies on New Zealand's excellent biosecurity status which provides significant market access opportunities internationally. This status is also key to the industry drive towards Integrated Pest Management to reduce agrichemical inputs while maintaining product quality and meeting the exacting standards of our international consumers.
3. Biosecurity is an inherently valuable asset and one of the very few benefits we enjoy from our comparative isolation. Effective biosecurity is very important to the New Zealand economy, indigenous species, tourism industry, iwi and our way of life. Any proposed changes to phytosanitary measures must strengthen not lessen our level of protection.
4. Horticulture New Zealand:

- supports Food Standards Australia and New Zealand (FSANZ) intent to vary the Food Standards Code to include irradiation of raspberry and blueberry
- Supports irradiation as a quarantine measure, where supported by appropriate science, for addressing the risk posed by pests concerned
- Supports Australian intent (as expressed in the 'Need for Irradiation'), to mitigate the further spread of Queensland fruit fly (*Bactrocera tryoni*) within Australia, particularly areas producing host products for export to NZ
- Supports the intent of harmonisation of phytosanitary irradiation treatments, based on science, but still providing sovereign decision-making that reflects individual country risk assessment
- Remains concerned about the enforcement of irradiated produce labelling for consumers, particularly in New Zealand.

## **BIOSECURITY PERSPECTIVE FOR NEW ZEALAND**

5. HortNZ welcomes efforts within Australia to mitigate the spread of Queensland fruit fly (QFF) within Australia through better interstate phytosanitary treatments. The establishment of QFF as endemic in areas of south eastern Australia, in areas previously of lower prevalence, and the loss of the Sunraysia Pest Free Area, has exacerbated the risk to New Zealand from QFF.

6. QFF is widely recognised as one of the world's worst economic pests of fruit. Apart from lowering production and making fruit inedible, it has severe effects on trade to sensitive local and international markets<sup>1</sup>, and the consequences for New Zealand are severe. The last incursion of QFF cost New Zealand \$15.7 million to eradicate.

7. HortNZ supports the FSANZ adoption of irradiation for phytosanitary purposes, whilst noting that no New Zealand Import Health Standard has been proposed for the importation of Australian raspberries or blueberries.

## **LABELLING OF IRRADIATED PRODUCE**

8. HortNZ remains concerned about the enforcement in New Zealand of mandatory labelling under the Food Standards Code. HortNZ has previously received numerous anecdotal examples of failure by retailers to meet the code in relation to irradiated tomatoes. Until such time as any other consumer education is undertaken, this labelling remains the principle method for informing consumers.

9. Direct consumer labelling has been identified as the principle means for consumers to get credible, accurate information. This consumer expectation was behind the Australian Mandatory Country of Origin Labelling (MCoOL) adoption. HortNZ encourages FSANZ enforcement, and adoption of a more rigorous consumer-level package labelling code.

## **CONCLUSION**

10. HortNZ supports adoption of the Code variation for phytosanitary irradiation, subject to proper enforcement of, and continuation of, the irradiation labelling requirements.

11. This submission is supported Tomatoes New Zealand, and Vegetables New Zealand.

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<sup>1</sup> <http://www.quarantinedomestic.gov.au/queensland-fruit-fly.html>