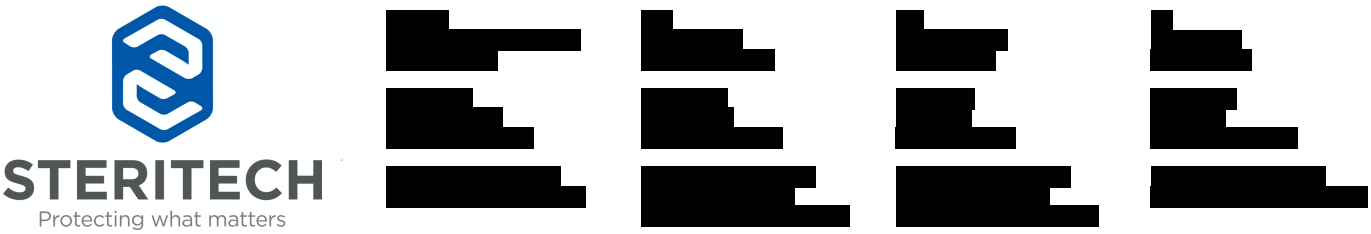

December 12, 2020

To Food Standards Australia New Zealand,

This letter is written in support of submission A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables.

For almost five decades, Steritech has been Australia's sole provider of commercial irradiation treatments. During this time Steritech has worked with many Australian and New Zealand industries to develop the heat-free and chemical-free sterilisation alternative. This has enabled many Australian and New Zealand businesses to go on and produce world leading products.

As a company we are proud to also be playing a role in protecting Australia's environment and crops while ensuring consumers have reliable access to healthy and affordable fresh produce. The progressive regulation of irradiation in Australia and New Zealand coupled with Steritech's investment in specialised infrastructure has positioned the two countries as leaders in the field of phytosanitary irradiation.

Australian industry has been able to utilise the treatment for many of the 26 approved crops, for import, export and domestic trade protocols. Volumes treated of each approved crop remain very seasonal and make up just a small percentage of total harvest. When the treatment is required however, it plays a critical role in the supply chain. This helps ensure Australia and New Zealand have a prosperous and sustainable fresh produce industry.

There are numerous benefits with phytosanitary irradiation that are increasingly understood by the wider stakeholder group, largely through observation of existing commercial success. This has led to a stronger appreciation for the science and the progressive dismissal of misunderstood and unfounded claims that consumers would not eat irradiated food. When irradiation is compared to existing chemical and fumigant alternatives, the argument for phytosanitary irradiation is compelling to most.

We hope FSANZ reaches a similar opinion to the horticultural industry when reviewing the application. We ask that community submissions against the application do not enable discrimination of other consumers through the limitation of irradiation and subsequent benefits. It is highly likely that the majority of Australia and New Zealand consumers are largely silent on these matters, placing their trust in FSANZ to effectively regulate on technical and scientific matters.

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The generic approval of irradiation will in no way limit organic fruit and vegetable choices for those that wish to avoid irradiation or any other treatment. The fact that irradiation is the only labelled treatment is often viewed as unfair by industry but provides complete power to the consumer to preference or avoid irradiated produce.

Failure to approve the submission will almost certainly limit choice and availability of fresh produce for conventional consumers, particularly where industry relies on new solutions to meet evolving commercial and biosecurity needs.

I have worked broadly across many stakeholder groups with phytosanitary irradiation, and summarised general information in relation to common subjects as follows:

Compliance:

Irradiation is one of the heaviest regulated and audited treatments available to industry. Steritech is audited annually by numerous organisations including federal and state agricultural departments, the Therapeutic Goods Administration and foreign trade partners. Steritech maintains an impeccable history of compliance and has never had a failed produce treatment identified.

Specific to labelling, this is the responsibility of all supply chain partners. Steritech checks every consignment for compliant labelling specific to the end market. For domestic shipments, state government inspectors check documentation and labelling prior to release for sale. For import and export between Australia and New Zealand there are at least two government regulated inspections that ensure labelling and other details are all compliant prior to the fruit clearing the export and import processes.

Reliability and effectiveness:

Phytosanitary irradiation is a highly automated process, with limited variables and subsequently an extreme level of process control when compared to alternate chemical and fumigant treatments that rely on human control of dynamic variables. The control and limited variables in the irradiation treatment process avoids under and over treating of product.

Safety:

Steritech has maintained a strong history of safety. Similarly, the simplicity of the treatment and the lack of dangerous chemicals and fumigants ensure the safety of consumers and employees are maintained effectively. The safety of phytosanitary irradiation from both an operational and a food safety perspective is a major strength and selling point for the treatment.

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Sustainability:

Phytosanitary irradiation is chemical free and a positive generator of Ozone. It is a direct alternative to Methyl Bromide which is recognised as an Ozone depleting gas in the Montreal protocol. This fumigant has been reported as causing a number of workplace health and safety incidences in Australia and around the world.

Irradiation is a direct alternative to chemicals such as Dimethoate. Dimethoate is still allowed for use in Australia on crops with inedible peels however there are operational challenges in applying a chemical safely and reliably. The number of Dimethoate dips registered at major export hubs has been diminishing.

The purpose of applying an end point treatment such as irradiation is to protect the environment. Ensuring irradiation is available to all fresh produce crops will provide confidence that the Australian and New Zealand environments are being afforded the highest level of protection.

In 2021, Steritech will complete a solar installation at the new Merrifield X-Ray facility which will allow sunlight to be converted into X-Ray's in the world's first high volume, chemical free, carbon neutral end point treatment.

Consumer choice and acceptance:

Commercial sales results in New Zealand and Australia have proven consumer purchasing is not negatively impacted when fruit is imported via an irradiation pathway. In some cases it will likely have a positive impact due to the higher fruit quality which has not been stressed by heat or fumigation.

With recent high publicity fruit fly incursions and fumigation failures in Tasmania and South Australia, consumers are becoming more aware of the need for treatments showing a positive preference for reliable non-chemical options.

Consumer insights into these matters have seen ICA-55 messaging used to reinforce the purpose and positive benefits of the treatment: "Treated with irradiation to protect local growers from fruit fly spread." This demonstrates the industry's ability to manage consumer marketing. Commercial matters such as consumer marketing should not impact food regulations founded on scientific information.

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Quality:

Existing treatments including VHT and Methyl Bromide can be highly detrimental to fruit quality. Food waste, shelf life loss and cosmetic defects all cause significant waste within the modern food chain.

Food waste is one of the top consumer trends and concerns. Quality is a major driving factor in the purchase behaviour of consumers. By enabling a greater selection of high quality fruit, phytosanitary irradiation can have a positive impact on consumer diets.

Dimethoate and Methyl Bromide treatments have been involved in publicly reported re-calls over recent years due to failed treatments. These recalls result in high volumes of product waste at great expense and detriment to the consumer diet.

Emergency preparedness and food security:

Global trends such as fewer in field chemical controls, warmer climates and increasing international trade is generating greater pressure on biosecurity systems. Australia must pursue turn-key solutions to ensure immediate access to effective treatments that enable continuation of trade as well as effective management of new pests under emergency circumstances.

While fumigants and chemicals require efficacy data specific to both the insect and the crop, irradiation already has a generic treatment for almost any insect in any crop. This makes it the only viable treatment for many vegetable and fruit crops in the event of a foreign or exotic pest incursion.

It is imperative that FSANZ generically approves the treatment to ensure it is available for use when unpredictable and urgent scenarios arise. The difference for a citrus grower (yet to be approved) compared to a grape grower (approved) could be financial devastation verses commercial success. Being able to apply irradiation treatment to some crops and not others effectively means our biosecurity organisations are entering a fight against foreign pests with one hand tied behind the back. This is placing all of Australia's fresh produce industry at unnecessary risk.

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Making the benefits of phytosanitary irradiation accessible for all fresh produce will enhance industry security and sustainability ensuring consumers continue to have access to fresh healthy food.

While the trade volume that is likely to utilise phytosanitary irradiation remains small, this submission is of strategic significance to the Australian and New Zealand horticultural industry which largely relies on just four end point treatments, three of which are chemical based.

I sincerely appreciate your consideration of this letter and A1193 and look forward to the final decision. While I have written this letter using my technical knowledge of the fresh produce supply chain, I sign it equally as consumer, a community member and a supporter of sustainable Australian agriculture.

Sincerely

[redacted]

[redacted]
Steritech Fresh Produce Business Manager