

Comments from the Victorian Department of Health and Human Services and the Victorian Department of Jobs, Precincts and Regions.

Due date of submission – 24 December 2020

The Victorian Departments of Health and Human Services and Jobs, Precincts and Regions (the departments) welcome the opportunity to respond to this application to amend the Australia New Zealand Food Standards Code (the Code).

Application A1193 – Irradiation as a phytosanitary measure for all fresh fruit and vegetables has been submitted by the Queensland Department of Agriculture and Fisheries to permit the use of irradiation as a phytosanitary measure (i.e. pest disinfection) for all types of fresh fruit and vegetables.

From the Food Standards Australia New Zealand (FSANZ) Call for Submissions, it is understood that:

- Standard 1.5.3 of the Code already provides for irradiation as a phytosanitary measure (pest disinfection) for 26 fruits and vegetables. The application seeks to extend irradiation as a phytosanitary measure to all types of fresh fruit and vegetables as defined in Schedule 22.
- The draft variation does not change the technological purpose (pest disinfection for a phytosanitary objective) or the permitted dose range (150 Gy – 1 kGy).
- Irradiation is recognised as an effective treatment for most regulated arthropod pests including tephritid fruit fly. Irradiation provides a chemical free phytosanitary treatment option for the horticulture sector, particularly where the use of chemical based treatments such as methyl bromide, fenthion and dimethoate are being phased out.
- Irradiation of food is approved in more than 60 countries, including for fruit and vegetables. The use of irradiation for phytosanitary measures is endorsed by the Codex Alimentarius (Codex) and the International Plant Protection Convention (IPPC).
- Phytosanitary irradiation does not affect the macronutrient or mineral content of fruit and vegetables. FSANZ's dietary intake assessment concluded irradiation will have a negligible impact on any cumulative losses in nutrient content of treated fruits and vegetables. For irradiation sensitive nutrients including vitamin C and β -carotene, irradiation has negligible impacts on dietary intakes of these nutrients.
- FSANZ's risk and technical assessment concluded there are no public health and safety concerns associated with consumption of irradiated fruit and vegetables up to 1 kGy.
- All irradiated fruits and vegetables are required by Standard 1.5.3-9 of the Food Standards Code to be labelled as such. Fruits and vegetables that are not required to bear a label, Standard 1.2.1-9 requires a statement accompanying the food or displayed in connection with the food to indicate the food has been treated with ionising radiation.
- The permission will apply to domestic and imported produce that requires phytosanitary treatment to permit its movement into another quarantine region, facilitating cross border trade within Australia, supporting the movement of produce from Queensland and Victoria to South Australia, Western Australia and Tasmania. It is anticipated the draft variation will provide opportunities for international trade by allowing more types of irradiated produce to be imported into Australia and New

Zealand and providing opportunity for reciprocal trade agreements with new and existing markets.

- This change will provide industry with a broader range of phytosanitary measures and allow businesses to choose a treatment based on effectiveness, quality retention and cost.
- The increased permissions will enable more consumer choice, particularly when produce might be out of season or in short supply.
- Potential impacts for regulators relate to the need increase in monitoring these labelling requirements and ensuring that irradiated foods not within the definition of fruits and vegetables do not enter the market.

In addition, the departments note the use of irradiation for both local and imported produce will require close monitoring to ensure it is not used for purposes other than pest disinfestation, such as to prolong shelf life. It is also noted that relevant regulators will need to ensure irradiation of defined fruits and vegetables is for phytosanitary purposes only and that these foods are appropriately labelled.

The departments suggest that FSANZ seek to communicate with the horticultural sector about the proposed new permission and, consumers, noting there may be an increase in irradiated foods in the market.

On the basis of the information above, the departments support the progression of Application A1193.