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From: [REDACTED]
Sent: Tuesday, 22 December 2020 4:25 PM
To: submissions; standards management
Subject: Response to "Call for submissions – Application A1193 Irradiation as a phytosanitary measure for all fresh fruit and vegetables"

Categories: [REDACTED]

Details:

[REDACTED]

Response to "Call for submissions – Application A1193 Irradiation as a phytosanitary measure for all fresh fruit and vegetables":

This proposal is highly controversial and unwise, scientifically, and legally.

There is a wealth of scientific research on other animal models which show severe health compromise, such as profound and chronic neurodegeneration of the central nervous system (CNS). Feline models exhibited Feline Irradiated Diet-Induced Demyelination (FIDID), with effects similar to sub-acute combined degeneration (SCD) (Radcliff et al. 2020). These health effects led to the untimely demise of these animal as they were euthanised due to the health effects of the irradiated diets. Irradiated foods are myelinotoxic and the neurological health effects will result in paraplegia and quadriplegia of humans, as was demonstrated in feline and other animal models (Radcliff et al. 2020; Child et al. 2009).

I do not think you would want this neurodegenerative effect on the human population of Australia, as legal implications of rendering people chronically disabled would be too costly to settle, I would imagine. If you continue in this proposal though, which is not founded on evidence based research, then I would like to warn you that you will undergo an immense amount of public backlash, especially when health effects become apparent, which from the animal studies is sooner than one would expect or hope.

You ought to only implement sound evidence-based proposals, of which this current proposal is not. Please rescind your current irradiation proposal, and understand that irradiation of fresh fruit and vegetables, or any foods, is not a safe avenue to pursue.

If pest damage is the real concern, then Integrated Pest Management (IPM) systems are the best option to pursue, with the added bonus of reducing operative costs as there is a reduced reliance of herbicides and pesticides in IPM systems.

The consequences of this proposal (Application A1193 Irradiation as a phytosanitary measure for all fresh fruit and vegetables) are far too damaging to human life, with far too costly legal implications. It is an unwise decision as it lacks an evidence-based approach. Please stop your pursuit of this proposal (Application A1193 Irradiation as a phytosanitary measure for all fresh fruit and vegetables).

Works cited:

Child, G., Foster, D.J., Fougere, B.J., Milan, J.M., and Rozmanec, M. 2009, "Ataxia and paralysis in cats in Australia associated with exposure to an imported gamma-irradiated commercial dry pet food", *Australian Veterinary Journal* vol. 87, no. 9, pg. 349-351, DOI: 10.1111/j.1751-0813.2009.00475.x

Radcliff, A.B., Heidari, M., Field, A.S., and Duncan, I.D. 2020, "Feline irradiated diet-induced demyelination; a model of the neuropathology of sub-acute combined degeneration?", *PLoS One* vol. 15, no. 1, DOI: [10.1371/journal.pone.0228109](https://doi.org/10.1371/journal.pone.0228109)

