

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, 22 December 2020 9:12 AM  
**To:** standards management  
**Subject:** Re[2]: SUBMISSION - A1193: Irradiation as phytosanitary measure for all fresh fruit and vegetables. [SEC=OFFICIAL]

**Categories:** [REDACTED]

[REDACTED]

----- Original Message -----

From: "standards management" <[standards.management@foodstandards.gov.au](mailto:standards.management@foodstandards.gov.au)>  
[REDACTED]

Sent: 22/12/2020 7:57:56 AM

Subject: RE: SUBMISSION - A1193: Irradiation as phytosanitary measure for all fresh fruit and vegetables. [SEC=OFFICIAL]

Dear [REDACTED]

Thanks for your submission on application A1193.

In order for FSANZ to process your submission, could you please provide contact details including: address and telephone number. We ask all submitters to provide this information in order to support the veracity and robustness of our submission process.

Personal information won't be made public and is redacted prior to submissions being placed on our website.

If I don't hear back from by Thursday 24 December - we will take your submission as withdrawn.

Feel free to contact me if you have any queries about this.

Regards,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, 18 December 2020 3:51 PM  
**To:** submissions <[submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)>  
**Subject:** SUBMISSION - A1193: Irradiation as phytosanitary measure for all fresh fruit and vegetables.

Dear Minister

We understand that the Government is considering blanket approval for irradiation of all fresh fruit and vegetables. We completely oppose this and cannot understand why it is being proposed.

My concerns question the wholesomeness of irradiated food as well as the environmental and social impacts of irradiating our food. Numerous alternatives to irradiation exist and I do not believe that the irradiation of these fruits for quarantine purposes benefits me or my family. We are great consumers of fruit and vegetables, and we want fresh produce not processed goods.

We are also worried that irradiated food will not be adequately labelled.

Numerous studies have shown the potential health risks posed by irradiated food. Its approval could significantly increase the amount of irradiated food in our diet. Consider vegetarians and vegans whose diets are plant-based. Are they to be targeted and have their health affected?

In 2003, concerns over the safety of irradiated food led the European Union Irradiation to rule out further irradiation approvals. The Australian Senate followed suit with a call for approvals to be halted until further research has been conducted. Has the research been done? What are the results?

We cannot rely on claims that irradiated foods are safe. This is an indefensible position as no research on long term consumption of an irradiated diet have been conducted.

Case against irradiation:

1. Irradiation has been shown to deplete vitamin C, vitamin A, proteins, essential fatty acids and other nutrients in food and has been linked to health problems such as nutritional deficiencies, immune system disorders, abnormal lymph cells, and genetic damage.
2. In 2008-9, irradiation was responsible for neurological disorders leading to paralysis and in some cases, death, of up to one hundred Australian pet cats. Irradiated cat food is now banned in Australia.
3. The European Food Safety Authority acknowledges that the risk to humans cannot be ruled out. How is it they are smarter than we are?
4. While irradiation is promoted as beneficial to Australian farmers; each approval also enables irradiated imports from overseas. Irradiation is a tool of large agri-business – and supports mass production system that diminish the power of local food producers and destroy local markets.
5. Irradiation will not eliminate the use of chemicals and pesticides in crop production; it will be used in conjunction with these and other food processes.
6. Increased costs to the health system in treating people with potentially increased health problems due to consumption of food whose nutritional values are depleted by irradiation.

We do not think Australians want to take that risk if they were aware and informed.

Finally, we are not confident that these fruits will be adequately labelled. This will lead to foods being marketed as “fresh” though they are in fact processed. Any irradiated food and their packages must be individually labelled “treated with radiation” or “irradiated.”

A1092 does not assure us that this will be the case. For these reasons we call on you to reject 1193 and to rescind all previous irradiation approval.

Thank you for the opportunity to make a submission,

[REDACTED]

[REDACTED]

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