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**From:** [REDACTED]  
**Sent:** Thursday, 24 December 2020 5:19 PM  
**To:** submissions  
**Cc:** [REDACTED]  
**Subject:** Submission RE: A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables

**Categories:** [REDACTED]

To whom it concerns,

As a qualified health and nutrition professional with a background of study in biological sciences in B.Sc (Biochemistry), I have significant concerns regarding the irradiation of foods. Food irradiation is evidenced to reduce the nutritional quality of foods and studies have not proved that a diet high in irradiated foods is safe in the long term.

No effective mechanism for the labelling of irradiated foods has been implemented or is under consideration. Furthermore, there are significant risks to the community in relation to the operation of food irradiation, with potential for dangerous contaminations supporting and arising from the processes.

I have been very concerned regarding the administration of the A1193 application. Originally the proposed timeframe for application A1193 was to commence in November 2020, with public consultation taking place in April 2021. In response to a Queensland Government application, it was announced on October 30th that an earlier deadline for public consultation was to be December 11th, 2020. This date has since been extended to December 24th, 2020 at 6pm AEDT.

I have identified and documented several incongruities related to the published and archived records of the Notification Circulars and Work Plans on the FSANZ website. The substantive risks for the implementation of food irradiation necessitate that the application process is clear, stable, timely and effective.

I oppose the blanket approval of irradiation of irradiation for all fresh fruit and vegetables. I have concerns about 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 my family. I am also worried that irradiated food will not be adequately labelled.

Numerous studies have shown the potential health risks posed by irradiated food. The approval of regularly eaten fruit and vegetables could significantly increase the amount of irradiated food in our diet.

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. Claims that irradiated foods are safe are indefensible as no research on long term consumption of an irradiated diet have been conducted.

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.

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. The European Food Safety Authority acknowledges that the risk to humans cannot be ruled out.

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 systems that diminish the power of local food producers and destroy local markets.

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.

Finally, I am not confident that these fruits will be adequately labelled. This will lead to foods being marketed as “fresh” though they are processed. Irradiated food and their packages must be individually labelled “treated with radiation” or “irradiated.” A1092 does not assure me that this will be the case.

For these reasons I call on you to reject A1193 and to rescind all previous irradiation approvals. I look forward to hearing your response to my concerns.

Thank you,

[REDACTED]