

[REDACTED]

From: submissions
To: [REDACTED]
Subject: RE: A1193 – Irradiation as a phytosanitary measure for all fresh fruit and vegetables

From: [REDACTED]
Sent: Thursday, 10 December 2020 12:13 PM
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Subject: A1193 – Irradiation as a phytosanitary measure for all fresh fruit and vegetables

I OBJECT TO THE BELOW APPLICATION:

A1193 – Irradiation as a phytosanitary measure for all fresh fruit and vegetables

THIS MUST NOT PROCEED! YOU MAY BE LIABLE FOR ILLNESSES AND POSSIBLE DEATH TO THOSE WHO ARE IMMUNE-COMPRIMISED!

TO ALL MINISTERS, WHAT WOULD YOU WANT FOR YOUR CHILDREN, GRANDCHILDREN AND FAMILIES? PLEASE SEE REASON HERE.

What is food irradiation?

Food Irradiation is the process of exposing food to ionising radiation from Cobalt-60, X-rays or electron beams. The food is mostly treated to neutralise pest insects or microbes, and to extend its shelf life. The Australian government has allowed food irradiation since 2001 after a 10-year moratorium was lifted. Since then, Australia and New Zealand government-supported industry campaigns have promoted irradiation as an 'alternative' to pesticides. Irradiated food is labelled, albeit inadequately. There has been an ongoing push to remove mandatory labelling requirements.

What has been approved?

To date, Food Standards Australia New Zealand (FSANZ) has approved the irradiation of herbs, spices, herbal infusions, and a wide variety of fruits and vegetables including: blueberries, raspberries, mangoes,

mangosteens, pawpaws, carambolas, breadfruits, custard apples, lychees, longans, rambutans, persimmons, tomatoes, capsicums, apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash. Now, you want to pass a blanket approval for the irradiation of all fruit and vegetables.

What's wrong with food irradiation?

Irradiation uses ionising radiation, which alters food's molecular structure, but leaves it looking intact. Substances produced by exposure to radiation are known as radiolytic products. Their presence indicates whether or not a product has been irradiated.

i Different foods react differently to radiation. The changes in them mean that Irradiated produce is processed; it is no longer fresh. Why do we recommend that FSANZ reject A1193? Nutrition: Irradiation depletes the vitamin and nutritional content of food. FSANZ generally says that the decrease is no more than with cooking – but I DO NOT WANT my fresh fruit to be pre-cooked or for their cooked veggies to lose double the amount of nutrients? Radiation Exposure to radiation changes the composition of the food producing “radiolytic products” including free radicals, various hydrocarbons, formaldehyde, amines, furan and 2-alkylcyclobutanones (2-ACBs) (FSANZ A1092).”

ii Some of these may be harmful. “Furan is carcinogenic to rats and mice, and is classified by IARC as possibly carcinogenic to human beings (Seok et al. 2013).”

iii 2-ACBs have been linked to DNA damage in humans and cancer in rats. FSANZ does not deny that radiolytic products may be harmful; FSANZ states that “Radiolytic compounds generated through food irradiation are not produced at levels that are likely to result in harm.”

iv But the levels can change. There is no guarantee that FSANZ will not approve an increase in the permitted radiation exposure levels. Already, some foods, herbs, spices and plants for herbal infusions are approved at much higher levels. The CODEX general standard, which FSANZ refers to as expanding permits, allows irradiation up to 10kGy, significantly more than the 1kGy requested in this application. Irradiating of all fruit and vegetables would adversely affect the nutritional value and safety of significant components of the Australian and New Zealand food supplies. While irradiation uptake is currently low, it is clear that Australians are increasing the amount of plant-based foods in their diets. A blanket approval for all fruit and vegetables could lead to the irradiation of a large part of certain communities' diets.

2019 figures from research company Roy Morgan show that almost 2.5 million Australians or 12.1 per cent of the population now have diets where almost all the food is vegetarian.

v <https://www.news.com.au/lifestyle/health/diet/more-australians-taking-up-vegan-and-vegetarian-diet/news-story/0676836c8695a0e53c24aac4d47d9106>

The nutritional and safety assessment fails to include research that questions the safety of irradiated foods and does not present evidence of the safety of a largely irradiated diet. Safety cannot be presumed. In fact, there has been no systematic data collection or published research to support the claim of safe consumption. Only relatively small amounts of a few foods have been irradiated and eaten, for various lengths of time, and no long-term studies have been conducted on human consumption of irradiated foods. Indeed, FSANZ admits that "No consumption data are available, but the amounts sold into the retail trade are known approximately. As the foods have been retailed for several years in a few thousand retail outlets (Eustace & Bruhn 2006), it may be presumed that retailers are actually selling most of the product."

vi FSANZ (2013) A1069, SD1 p. 3. FSANZ makes the fundamental error of asserting that a lack of evidence of harm is the same as evidence of safety. Suggesting that food irradiation has been proven safe - without any kind of surveillance system - is scientifically indefensible. Irradiated pet food was responsible for the death and injury of a significant number of cats in Australia, leading to its ban. FSANZ has failed to even mention this or include relevant research in its assessment of A1193.

In 2008-9, 87 Australian cats died or were paralysed after consuming irradiated cat food.vii FSANZ's initial response was to exclude the research from its assessments because it had already concluded that the illness was cat specific, despite a lack of solid scientific evidence for this claim.

vii Until the mechanisms of these adverse health impacts are fully explored and understood, and negative impacts on humans and other species are absolutely ruled out, no irradiated foods should be allowed to enter the human food supply. Irradiation is not an alternative to chemical treatments. At best, irradiation may substitute for some post-harvest chemical treatments. However, the food most likely to be subject to irradiation is food produced using "conventional" agricultural processes – which today means using chemicals and pesticides and possibly GMOs from seed development through harvesting.

There is no technological need for irradiation as numerous alternatives exist, such as pest-free zones, physical disinfestation and organic agriculture. Examples include: Delayed ripening: Many fruits such as bananas and papaya can be picked at a green stage when they are not hosts for fruit flies. They will ripen at the market.

Whole of systems approach: This requires an orchard management system that involves fruit fly baits, traps, removal of all fallen and over-ripe fruit, as well as having a harvest maturity index from fruits. Non-chemical decontamination methods include: heat/steam vapour treatment, cold treatment, exclusion zones, modified atmospheres and vacuum packs.

For example:

- Australia exports steam vapour treated mangoes to Japan as that country does not permit irradiated or chemically treated fruits. Australia sends chemically treated or irradiated mangoes to our domestic markets and irradiated mangoes to New Zealand.
- New Zealand accepts steam vapour treated papayas from several Pacific countries but not from Australia. Australian papayas sent to Victoria and South Australia are treated with chemicals and can be irradiated. ix (Leu, Andre, OFA newsletter, Organic Update, 31/1/12) Irradiation is a tool of large agribusiness and will be used on top of, not instead of, chemical treatments. So far, there has been little research into the interaction of radiation on pesticides and GMOs. Australia has a growing organics industry which thrives without the use of any of these technologies. Labelling requirements are weak and there is no way to

visually distinguish between irradiated and nonirradiated foods. Thus, shoppers depend on the integrity and comprehensiveness of irradiation labelling. bars, etc. As there is no simple, reliable and affordable test for irradiated foods, it is difficult for state and local authorities to monitor them in the marketplace and to enforce the labelling requirements. It is unclear whether or how FSANZ or state authorities will monitor the labelling of irradiated food as well as the food purchased and then used in commercial kitchens, restaurants, juice bars, etc.

A1193 cannot be claimed to be a mechanism for aligning Australia with overseas regulations or practices. The EU, for example, only permits the irradiation of herbs and spices. Japan only permits the irradiation of potatoes. Despite international agreements stating that they may, many other countries do not have blanket approvals for all fruit and vegetables.

Finally, the applicant is the Queensland Government also participates in the health and safety assessment of the application. This presents a clear conflict of interest which casts substantial doubt on, and undermines consumer confidence in, the ability of FSANZ to protect the public health of all Australians.

We are gravely concerned that the Queensland government has attempted to fast-track A1193 and that FSANZ has changed the dates of public consultation without clear notification to the public. The purpose of the Food Standards Act is to ensure public health protection via, amongst other things, “an affective, transparent and accountable regulatory framework, within which the food industry can work efficiently.” Public notice requirements are intended to promote accountability and transparency in the regulatory framework. We assume that their intention is also to promote public engagement. By changing the date of public consultation, unannounced, FSANZ has limited the scope of possible community engagement beyond FSANZ’s networks, disadvantaged the community it is meant to protect and represent and thus failed to provide opportunity for the robust community conversations required in a functioning democracy.

PLEASE ACKNOWLEDGE RECEIPT. REPLY EXPECTED.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

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