

[REDACTED]

---

**From:** submissions  
**To:** [REDACTED]  
**Subject:** RE: Submission on A1193 Irradiation of all fresh fruit and vegetables

---

**From:** [REDACTED]  
**Sent:** Sunday, 6 December 2020 4:46 PM  
**To:** submissions  
**Subject:** Submission on A1193 Irradiation of all fresh fruit and vegetables

Dear FSANZ

**Levels of evidence:** As a proposal that purports to have a scientific base, Application A1193 fails the test for levels of evidence required. Level 5 peer-reviewed publications are essential. The Executive Summary does not even provide a list of references, only name and date in the text. This is not enough for a proper analysis.

It is apparent from the unexcused use of a “personal communication” from a business that stands to gain from the proposal that the research evidence is *inadequate, flawed or lacking*.

Data is selective: “available data” does not prove adequate investigation of data, but in this case appears to be an excuse for failure to investigate fully. In particular it fails to give due attention to *alternatives to irradiation*.

There is a cumulative effect of one assumption after another – “likely”, “estimates”, “conservative estimate”, ... and then the unjustified conclusion that, as a result of these rubbery estimates, **the risk ... is of no practical concern**.

This proposal is no basis for wide-ranging changes to food processing guidelines. There are gaping holes in data that would be needed to prove it safe. It has no apparent scientific credibility.

[REDACTED]

[REDACTED]

\*\*\*\*\*  
This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

Scanned by Clearswift SECURE Email Gateway at Food Standards ANZ.  
\*\*\*\*\*



Virus-free. [www.avg.com](http://www.avg.com)