

13 October 2014

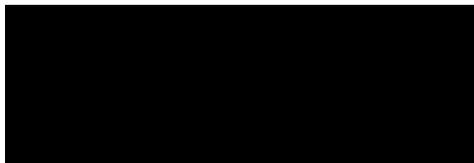
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1092 Irradiation of Specific Fruits.***

Yours sincerely



Katherine Rich  
**Chief Executive**

**Food Standards Australia New Zealand**  
**CALL FOR SUBMISSIONS – APPLICATION A1092 IRRADIATION OF**  
**SPECIFIC FRUITS**  
**October 2014**

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the *Call for Submissions – Application A1092 Irradiation of Specific Fruits*.

**New Zealand Food & Grocery Council**

NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$34 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$28 billion in export revenue from exports to 185 countries – some 61% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages. Our members directly or indirectly employ 370,000 people – one in five of the workforce.

**Application A1092**

The Application seeks to expand the use of irradiation as a pest disinfestation measure for a range of fruits and a vegetable: apple, apricot, cherry, nectarine, peach, plum, honeydew, rockmelon, scallopin, strawberry, table grape, zucchini (courgette) for phytosanitary purposes. If approved, the permission to irradiate these fruits and the vegetable would add to the existing permissions in Standard 1.5.3 which currently cover a range of sub-tropical fruit, tomatoes, capsicums, herbs and spices and herbal infusions.

**Comment**

The technological need, as an alternative infestation treatment to chemical disinfestation treatments used in the past, is supported by both Australian and New Zealand biosecurity agencies. The irradiation process has been widely examined, researched and reported on previously and internationally. It is efficient and safe for consumers. Experts agree that products irradiated to the proposed levels are safe for human consumption.

NZFGC also notes that the published literature indicates that irradiation up to 1 kGy does not reduce the nutritional quality of fruits and vegetables. In particular, the carbohydrate, fat, protein and mineral content of foods are unaffected at such levels. The literature review that FSANZ published in February 2014 confirmed this position.

In terms of impact for FGC members, it is important to note that New Zealand has a healthy fruit and vegetable sector, so supply during parallel seasons is not considered an issue. However, with the broader growing season available in Queensland (the source of the application), supply outside the main season could be of use in the future.

NZFGC therefore supports the proposed amendment to allow irradiation of the proposed fruits and the vegetable with a minimum dose of 150 Gray (Gy) and a maximum dose of 1 kGy.