

10 August 2016

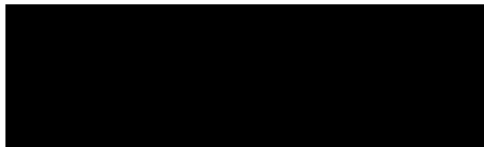
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for submissions – Application A1115: Irradiation of Blueberries & Raspberries.***

Yours sincerely



Katherine Rich
Chief Executive



***Call for submissions – Application A1115:
Irradiation of Blueberries & Raspberries***

Submission by the New Zealand Food & Grocery Council

10 August 2016

NEW ZEALAND FOOD & GROCERY COUNCIL

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the ***Call for submissions – Application A1115: Irradiation of Blueberries & Raspberries***.
2. 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 \$31 billion in export revenue from exports to 195 countries – some 72% of total merchandise exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 44% of total manufacturing income. Our members directly or indirectly employ more than 400,000 people – one in five of the workforce.

OVERARCHING COMMENTS

3. NZFGC is strongly supportive of FSANZ’s proposal for the Food Standards Code to permit the irradiation of these fruits by adding them to the Standard 1.5.3 with a minimum dose of 150 Gy and a maximum dose of 1 kGy.
4. Quarantine agencies in Australia and New Zealand have previously provided advice to FSANZ that irradiation is a valid treatment for quarantine purposes for the disinfestation of these fruits. Permitting the irradiation of blueberries and raspberries is intended to facilitate increased domestic and international trade as there are rigorous requirements in place for an appropriate and efficacious treatment for fruit fly for quarantine purposes.
5. NZFGC notes that in every case for applications for irradiation of fruits and vegetables for phytosanitary purposes, the approval has been supported and amendments made to the Food Standards Code for an irradiation dose of 150 Gy-1 kGy.
6. FSANZ published a review of the literature on the nutritional impact of phytosanitary irradiation of fruits and vegetables in February 2014, and concluded that phytosanitary doses of irradiation do not pose a nutritional risk to the Australian and New Zealand populations.
7. In light of this experience and research, NZFGC recommends that FSANZ consider the resources for those involved to make, assess, submit and consider decisions on irradiation of fruits and vegetables and to propose a blanket permission for fruit and vegetables to be irradiated at an irradiation dose of 150 Gy-1 kGy and subject to review should scientific evidence of a need to depart from the range be identified.

SPECIFIC COMMENTS

The Application

8. The NSW Department of Primary Industries (NSW DPI) has applied for the irradiation of blueberries and raspberries for phytosanitary purposes. The same dose range, 150 Gray (Gy) to 1 kGy, and conditions (including mandatory labelling) as currently prescribed for tropical fruits, persimmons, tomatoes and capsicums and a range of other fruits and vegetables in the *Australia New Zealand Food Standards Code* (the Food Standards Code) has been requested.

Phytosanitary purposes for irradiation

9. Blueberries and raspberries (and presumably a range of other berries) are potential hosts to fruit flies and other pests. FSANZ has characterised the Queensland fruit fly as one of the world's worst pests of fruiting crops and is listed as a pest requiring treatment by most international and interstate (in Australia) markets trading in the movement of fresh fruit.
10. Quarantine agencies in Australia and New Zealand have previously provided advice to FSANZ that irradiation is a valid treatment for quarantine purposes for the disinfestation of these fruits.
11. Permitting the irradiation of blueberries and raspberries is intended to allow increased domestic and international trade as there are rigorous requirements in place for an appropriate and efficacious treatment for fruit fly for quarantine purposes. In the past, phytosanitary measures for these foods have primarily involved the use of the chemicals dimethoate and/or fenthion. However, since the use of these chemicals as a quarantine treatment has been restricted, other options such as irradiation need to be considered.

Berries in New Zealand

12. While this application is made by NSW DPI, there is potential for application in New Zealand. Berry production has been a small but important industry in New Zealand over recent years. As well, imports of berries have been increasing with an estimated value of \$330m in berry imports as at mid 2015.

Irradiation dose proposed

13. FSANZ considers there are negligible risks to public health and safety associated with the consumption of blueberries and raspberries which have been irradiated at up to a maximum of 1 kGy.
14. FSANZ is proposing the Food Standards Code permit the irradiation of these fruits by adding them to the Standard 1.5.3 (and specifically to the table to subsection 1.5.3—3(2)) with a minimum dose of 150 Gy and a maximum dose of 1 kGy.
15. NZFGC is strongly supportive of this approach.

Future irradiation provisions in Standard 1.5.3

16. NZFGC notes that to date the following irradiated fruit and vegetables have been approved:
 - ☐ tropical fruits (mango, breadfruit, carambola, custard apple, litchi, longan, mangosteen, papaya and rambutan) (under A443)
 - ☐ persimmons (under A1038)
 - ☐ tomatoes and capsicums (under A1069)
 - ☐ apple, apricot, cherry, nectarine, peach, plum, honeydew, rockmelon, scallopini, strawberry, table grape, zucchini (courgette) (under A1092).
17. NZFGC notes that IN EVERY CASE, permission has been provided for an irradiation dose for phytosanitary purposes of 150 Gy-1 kGy.
18. In February 2014, FSANZ published a review of the published literature on the nutritional impact of phytosanitary irradiation of fruits and vegetables and concluded that phytosanitary doses of irradiation do not pose a nutritional risk to the Australian and New Zealand populations.

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19. NZFGC considers it is timely for FSANZ to consider the resources for those involved to make, assess, submit and consider decisions on irradiation of fruits and vegetables and to propose a blanket provisions reviewable should scientific evidence of a need to depart from the range be identified.