



1/12/2020

Regarding:

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

To whom it may concern,

I was recently contacted by exporters of Australian lychees and mangoes with regards to Application A1193. We understand this application proposes that all fruits and vegetable be permitted to use phytosanitary irradiation. Our exporters requested we share our experience with importing fruits and vegetables allowed to use this treatment.

First of all, Australian mangoes and lychees are second to none. The only way to import these fruits to the US is by irradiation which provides optimum organoleptics and cold chain maintenance. Irradiation permits mangoes to be picked at the peak of maturity, rather than sub-maturity necessary for other treatments. Irradiation does not degrade product quality or worker safety. All other treatments, e.g., fumigation, thermal treatments, or cold treatment compromise product quality as product must be picked green to accommodate and the product undergoes temperature abuse in the treatment process. In the case of methyl bromide fumigation, residues can constitute a health hazard risking worker safety if treatment protocols are not strictly followed.

Melissa's has also imported mangosteen from Thailand; dragon fruit and rambutan from Vietnam; mangoes from India; and mangos, figs, dragon fruit, guavas and sweet limes from Mexico. Some have large trade volumes; others are small. But all are unique and help diversify our portfolio and enable us as importers to offer assortment to our retail customers seeking points of differentiation in the marketplace. The only possible pathway to effective market access is the use of irradiation where dosimetry has proven time and again to be efficacious for broad spectrum pest control and maintenance of product quality.

Accordingly, we have sold in the US sold tons of wonderful fruits from around the world treated with phytosanitary irradiation. We have never had an issue with irradiation and while we believe the other options are still safe and important, we consider irradiation a preferred treatment of choice. Irradiation has been researched and proven safe and efficacious since the early 1900's; its use as a pest disinfestation treatment has been endorsed by WHO, FDA, CDC, and USDA. Irradiation remains an extremely reliable, sustainable and smart option for the future.

Thank you for soliciting our comments; we see no reason why the Application should not be successful.

Kind regards,

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