

From: [REDACTED]
Sent: Wednesday, 16 December 2020 6:35 PM
To: submissions
Subject: Submission re A1193 Irradiation as phytosanitary measure for all fruit and vegetables

Categories: [REDACTED]

BRIEF OVERVIEW OF FOOD IRRADIATION IN AUSTRALIA AND NEW ZEALAND

Food irradiation is used for shelf-life extension and for neutralising, not removing, contaminants or pests. Food Standards Australia New Zealand (FSANZ) has approved 26 fruits and vegetables for irradiation as well as herbs, spices and herbal infusions. It now wants to approve a blanket approval for the irradiation of all fresh fruit and vegetables. This approval would significantly increase the proportion of irradiated foods in the average Australian and New Zealander diet.

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.

Irradiation decreases the vitamin and nutritional content of food and disrupts its molecular structure, producing free radicals and potentially harmful chemicals such as benzene, formaldehyde and cyclobutanones.

Irradiation is being promoted as an “alternative” to some post-harvest chemicals that are being phased out. Numerous non-chemical alternatives exist. 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.

Labelling is inadequate and must be improved to ensure the public's right to choose. Current laws already allow shops to use a sign.

CC: [your relevant state & federal MP,](#) [REDACTED]

I oppose the blanket approval of irradiation for all fresh fruit and vegetables. I have concerns about the wholesomeness of irradiated food as well as the environmental and social impacts of irradiating our food. Numerous alternatives to irradiation exist and I do not believe that the irradiation of these fruits for quarantine purposes benefits my family. I am also worried that irradiated food will not be adequately labelled.

Numerous studies have shown the potential health risks posed by irradiated food. The approval of regularly eaten fruit and vegetables could significantly increase the amount of irradiated food in our diet.

In 2003, concerns over the safety of irradiated food led the European Union to rule out further irradiation approvals. The Australian Senate followed suit with a call for approvals to be halted until further research has been conducted. Claims that irradiated foods are safe are indefensible as no research on long term consumption of an irradiated diet have been conducted.

Irradiation has been shown to deplete vitamin C, vitamin A, proteins, essential fatty acids and other nutrients in food and has been linked to health problems such as nutritional deficiencies, immune system disorders, abnormal lymph cells, and genetic damage.

In 2008-9, irradiation was responsible for neurological disorders leading to paralysis and in some cases, death, of up to one hundred Australian pet cats. Irradiated cat food is now banned in Australia. The European Food Safety Authority acknowledges that the risk to humans cannot be ruled out.

While irradiation is promoted as beneficial to Australian farmers; each approval also enables irradiated imports from overseas. Irradiation is a tool of large agri-business – and supports mass production systems that diminish the power of local food producers and destroy local markets.

Irradiation will not eliminate the use of chemicals and pesticides in crop production; it will be used in conjunction with these and other food processes. No evidence has been provided that the combination of chemicals on crops and in other food products is safe when consumed together.

Finally, I am not confident that these fruits will be adequately labelled. This will lead to foods being marketed as “fresh” though they are processed. Irradiated

food and their packages must be individually labelled “treated with radiation” or “irradiated.” A1092 does not assure me that this will be the case.

For these reasons I call on you to reject A1193 and to rescind all previous irradiation approvals. I look forward to hearing your response to my concerns.

Thank you,

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