[redacted]

From: submissions
To: [redacted]
Subject: RE: Submission RE: A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables

From: [redacted]
Sent: Tuesday, 8 December 2020 2:11 PM
To: submissions <submissions@foodstandards.gov.au>
[redacted]
Subject: Submission RE: A1193: Irradiation as a phytosanitary measure for all fresh fruit and vegetables

Dear Minsters, Representatives, Staff and Associates of Food Standards Australia New Zealand;

To my great surprise, I have discovered that FSANZ has **changed the date of public consultation on this important matter without properly informing the public**. This is not appropriate, nor is it fair or reasonable. I ask you to extend the public consultation period so that the views of the public, and particularly those with scientific expertise in the matter, can be heard.

Now, to the substance of my submission: FOOD IRRADIATION IS NOT SAFE.

Exposure to radioactive sources necessarily introduces the possibility of the target also becoming radioactive – that is to say, Foods treated by this process have a significant chance of containing dangerous radionuclides that are directly harmful to human health. Radiation is not a selective, or precise means of sterilisation. Radioactive decay introduces the likelihood that stray particles and neutrons may enter the food, and subsequently decay further after consumption, directly exposing people to radiation inside their own bodies. The stochastic nature of radioactive decay means this possibility cannot be eliminated. In addition the production of chemically toxic materials in the target foodstuffs is a significant possibility – lead is injurious to human health, let alone the other possible metastable decay products. Direct ionisation of organic chemicals can also cause the formation of free radicals, which then react to form by-products not otherwise found in nature. It certainly is known to cause the depletion of vitamin content.

As you may have implied, I strongly oppose the blanket approval of irradiation 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 food. Numerous safer alternatives to irradiation exist, and I do not believe that the irradiation of these fruits for quarantine purposes benefits anyone. 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 this process for 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 Irradiation 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. When pharmaceuticals are approved, large longitudinal studies are a necessity; how is it that the risks of irradiated food are not regarded in the same way?

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. If we can't use it safely on CAT FOOD, why should we be applying it to food for HUMAN consumption? This is foolhardy in the extreme.

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. In addition we will be left with the depleted radioactive waste from the process, which must be disposed of in a security-conscious manner.

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.

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,

[redacted]