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From: [REDACTED]
Sent: Friday, 11 December 2020 12:09 PM
To: submissions
Cc: [REDACTED]
Subject: submission by GE Free Northland (in food & environment) New Zealand in response to FSANZ A1193 All 'fresh' fruits and vegetables to be Irradiated proposal A1092

Categories: [REDACTED]

Submission to:
Food Standards Australia NZ (FSANZ)

Submission on A1193 "Irradiation of all fresh fruit and vegetable"

Submission by:

GE Free Northland (in food & environment)

Contact details:

Secretary

[REDACTED]

email:

[REDACTED]

Thank you for the opportunity to make a submission so that together we can achieve sound public health, food sovereignty, and other important outcomes.

Who we are:

Our community group works constructively with all Northland territorial authorities, the Northland Regional Council, Northland and Auckland mana whenua, Northland Conservation Board, Northland/ Auckland primary producers, primary producer boards, organic shops and other food retailers, central government and other organisations to protect our existing valuable GM free status and right to eat GM /GMO free food.

We work to protect our biosecurity, unique biodiversity, conventional, IPM and organic primary producers, our economy, food sovereignty, and the public health from the risks/ adverse impacts of outdoor use of GMOs and against any GE/GMO content in imported processed food.

We also work to protect the quality of food stuffs in general, including fresh produce, and keep a watching brief on any threat to the quality of imported food stuffs.

We support comprehensive GE/GMO labelling of all imported foodstuffs to protect "consumer right to know" and traceability. We oppose GE/GMO (including gene edited organism) food content in our national food supply. We have grave concerns about hidden (unlabelled) GE/GMO content in imported food stuffs. We have concerns about poor decisions made in the past regarding GE/GMO food applications by the Australian dominated trans-Tasman agency "Food Standards Australia NZ". We support full and comprehensive labelling to indicate any nutritionally deficient/ compromised food (including irradiated foods).

We support NZ's existing Zero Tolerance Policy for any GE content in imported seeds, including adventitious presence.

We support the precautionary and prohibitive GE policies of all Taitokerau Iwi authorities for their respective rohe and support "Hua Parakore" pure food. We support the right of Northlanders to eat high quality, nourishing, pure food (both locally produced/ domestically and food imported sold in Northland and Auckland shops, supermarkets, dairies and takeaway premises). This includes fresh produce imported.

We support the innovative work of all the member councils of the Northland/ Auckland "Inter Council Working Party on GMO Risk Evaluation & Management Options", working to create an additional (much needed) tier of local protection against the risks of outdoor use of GMOs.

We work to keep unwanted new organisms (GMO and otherwise) out of Taitokerau and Auckland region (and wider NZ). We applaud the efforts of various NZ councils (including Hastings District Council) to put in place a much-needed additional tier of local protection against the risks of outdoor use of GMOs to their regions biosecurity, unique biodiversity, wider environment, GE free primary producers, economy, cultural values, and food sovereignty.

Comments regarding the deeply flawed Application A1092:

Irradiation of specific fruits: apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash

On behalf of our members (Pakeha and Maori) we **oppose** proposal A1092.

We urge FSANZ to reject this application and protect the nutritional value and safety of the human food supply in both NZ and Australia. Hua Parkore ("pure food") must be protected, including food imported into NZ and Australia.

We recommend that FSANZ **reject** proposal A1092 on the following grounds:

- Irradiation of apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash would significantly adversely affect the nutritional value and safety of significant components of the NZ (and Australian) food supply
- Combined with fruits and vegetables already approved for irradiation, this proposal would constitute an unacceptable reduction in the nutritional value and safety of the human food supply in both countries. We are concerned that A1092 is being inappropriately assessed by FSANZ in isolation from its total dietary context.

We are aware that no other countries (or states) expressly require the irradiation of apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash, so approval of A1092 cannot be claimed to be a mechanism for harmonization of trade regulations.

We urge FSANZ to adopt option 2 and reject A1092 which seeks permission to irradiate apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash.

Our recommendation to FSANZ (grounds for declining this application) is based upon:

- the safety and nutritional integrity of irradiated foods has not been established;
- the fact that this particular application and the FSANZ assessment are flawed in many ways
- the technological need for the proposed irradiation has not been established;
- irradiation is not the only effective option for fruit fly control that exists or is used now;
- the assessment has no cost/benefit analysis of other phytosanitary measures that could be used instead of food irradiation
- FSANZ must ensure a whole systems approach is used that would guarantee - or at least make accessible – other approaches to quarantine solutions;
- A1092 offers no benefit whatsoever to New Zealanders or Australians
- if A1092 were approved, the NZ and Australian public would be unfairly and unnecessarily exposed to further risks, costs and hazards;
- exporting apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash is likely to expose local growers to greater competition from imported produce, further reducing and significantly undermining our local primary production and businesses
- if further fresh foods were approved, only full and comprehensive, easily visible irradiated food labelling would support public confidence in the wholesomeness of NZ and Australian foods and the integrity of the food industry itself. There must be a clear choice- the right of New Zealanders and Australians to choose/ obtain non-irradiated food must be prioritized and protected.

We urge FSANZ to:

- Decline approval for the irradiation of apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash
- Refuse any further irradiation approvals
- Terminate all previous irradiation approvals.

We wish to be heard. Please keep us informed.

We support the more substantive submissions by GE FREE NZ, Physicians & Scientists for Global Responsibility Charitable Trust NZ, Food Irradiation Watch, supported by Gene Ethics and other Australian organisations including Friends of the Earth