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Food Standards Australia New Zealand
P O Box 7186
CANBERRA BC ACT 2610

5th November 2012

Dear Sir/Madam,

RE: CALL FOR SUBMISSIONS – APPLICATION A1069, IRRADIATION OF TOMATOES & CAPSICUMS

Bundaberg Fruit and Vegetable Growers Cooperative Ltd (BFVG) is pleased to support this application to FSANZ as outlined above. BFVG is of the opinion that Irradiation, as a Phytosanitary measure, will form a critical post-harvest treatment in the future for many horticultural commodities. It is important that horticultural growers are provided with a range of options for their business operations and market. In relation to post-harvest treatment enabling market access, Irradiation could well be the choice of many growers.

In reference to this specific application for the inclusion of Tomatoes and Capsicum, I would like to highlight the total farm-gate production value of Tomatoes in the Bundaberg region was estimated in 2009 to be \$156 million, while Capsicum production was estimated to be \$17.5 million. With a regional production value of all horticultural crops estimated in 2009 to be nearly \$454 million, these two crops represent 38% of the crops produced in the Bundaberg region.

A large proportion of the Tomato and Capsicum production in the Bundaberg region is destined for the southern state and export market places. Given the current situation regarding the interim findings of the Dimethoate review by the APVMA, and the subsequent impact on market access for growers of these two commodities, it stands to reason that alternative solutions be immediately granted to the Horticulture industry - Irradiation is one such alternative.

BFVG has undertaken a project in area wide Integrated Pest Management which contained an element of pest activity monitoring including monitoring of Fruitfly, Macadamia nutborer and Heliothis. This research helped identify hotshots of pest activity on a weekly basis over the past 12 months.

Through this project, BFVG is well placed to understand the significant threats to horticultural crops from Fruitfly, the challenges and costs growers face in reducing this risk, and implications to growers' profitability and productivity now they have reduced access to cost-effective on-farm Fruitfly control and post-harvest treatments that do not impact fruit quality and shelf life.

BFVG also requests FSANZ also consider fast-tracking all application AND assess these and future applications as a generic 'group' for phytosanitary purposes. With the recent loss of dimethoate and fenthion as market access tools, measures such as irradiation with a generic approval for ALL fruit and vegetable commodities will greatly assist in supplying food to the consumer. This will also greatly reduce the cost impost to an industry that has in excess of 100 commodities that are currently being assessed on a case-by-case basis."

I trust this call for submissions – Application A1069, is viewed favourably by FSANZ - particularly so for the application's merit and benefits to the production horticulture industry today worth nearly \$500 million farm-gate value in the Bundaberg region alone.

Yours sincerely,

A black rectangular box redacting the signature of Peter Hockings.

Peter Hockings
Executive Officer

CC: , representative of Steritech Pty Ltd

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