

7 November 2012

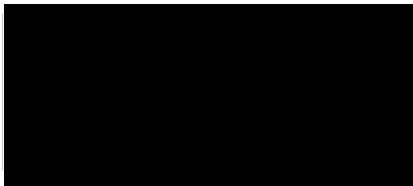
Manager
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the Assessment Report for **Application A1069** *Irradiation of Tomatoes and Capsicums*.

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
Application A1069 – IRRADIATION OF TOMATOES AND
CAPSICUMS – Assessment Report

7 November 2012

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to make a submission on *Application A1069 – Irradiation of Tomatoes and Capsicums – Assessment Report*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates \$28.7 billion in the New Zealand domestic retail food, beverage and grocery products market and \$26.3 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs 104,160 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to 344,820 in 85,252 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1069

The NZFGC understands that the Application is a joint effort between Australian and New Zealand interests and experts. It seeks to expand the use of irradiation as a pest disinfestation measure for fruit fly for tomatoes and capsicums. If approved, the permission to irradiate tomatoes and capsicums would add to the existing permissions in Standard 1.5.3 covering a range of sub-tropical fruit, herbs and spices and herbal infusions. In terms of impact for FGC members, supply around the main New Zealand growing season could be of importance in the future particularly if current chemical disinfestations options are removed or phased out.

Comments

The NZFGC notes that the ‘technological need to irradiate tomatoes and capsicums’ was the first aspect assessed by Food Standards Australia New Zealand (FSANZ) together with the the safety to consumers of the food if irradiated at the levels proposed in the application.

The technological need, as an alternative infestation treatment to chemical disinfestation treatments currently available or in the process of being phased out, is supported by both Australian and New Zealand biosecurity agencies. The process has been widely examined,

researched and reported on previously and internationally and is understood to be efficient and safe for consumers. All agree products irradiated to the proposed levels are safe for human consumption.

The balance of the assessment undertaken focussed on the impact of irradiation on the nutritional profile of tomatoes and capsicums and the impact of irradiation-sensitive vitamins on the intake by New Zealanders and Australians.

The NZFGC notes the conclusion reached by FSANZ on the nutrient profile of tomatoes and capsicums was: “the irradiation of whole, ripe tomatoes or capsicums up to the proposed maximum irradiation dose of 1 kGy is unlikely to result in a discernible effect on nutrient content.”¹

FSANZ might have gone no further. However, it went on to conduct a dietary intake assessment, the objective being to assess the impact of any change in the nutrition profile of irradiated tomatoes and capsicums. Given that it had already been concluded that there was unlikely to be a discernible effect on nutrient content, much of this assessment was about a ‘worst case scenario’ where a 15% nutrient loss applied to ALL tomatoes, capsicums and tropical fruits permitted to be irradiated was modelled. The cumulative effects of the intake impact was therefore the subject of this part of the assessment.

The conclusion was that even in the worst case scenario, irradiation proposals and previous permissions are likely to have “no impact on population nutrient intakes for any irradiation-sensitive nutrient considered.”²

Conclusion

The NZFGC supports the proposed amendment to Standard 1.5.3 to permit tomatoes and capsicums to be irradiated as a disinfestation treatment for pests particularly fruit fly.

¹ p23 *Risk and technical assessment report – Application A 1069 Irradiation of Tomatoes & Capsicums* FSANZ, 2012.

² p44 Ibid