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Standards Management Officer  
Food Standards Australia New Zealand  
PO Box 7186  
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Dear Sir/Madam

Steritech welcomes the opportunity to provide input to Food Standards Australia New Zealand (FSANZ) as part of its proposed amendments to the Australia New Zealand Food Standards Code (the Code) to permit the irradiation of tomatoes and capsicums.

For more than 30 years, Steritech has been a world leader in decontamination and sterilisation processing. Today, Steritech has plants operating in Melbourne, Sydney and Brisbane providing services to the medical, pharmaceutical, packaging and food industries. Steritech is proud to be an Australian family-owned company, operating the only commercially available irradiation plants in the country.

We believe changing the Code to allow the irradiation of tomatoes and capsicum is entirely consistent with FSANZ's legislated objective of protecting public health and safety. The widely held scientific consensus after more than 50-years of research is that when food irradiation is carried out in accordance with specified standards, it produces food that is safe and nutritious.

More than 50 countries currently allow the use of irradiation of food and international food regulatory bodies support use of the irradiation process at approved levels. Many countries, including the United States and the United Kingdom, have approved irradiation of fruit and vegetables as a food class for quarantine purposes and/or to extend shelf life. This supports the finding in the FSANZ A1069 Risk and Technical Assessment Report that irradiation is a valid quarantine treatment that meets a technical need.

The FSANZ Report also details scientific data that indicates that the carbohydrate, fat, protein and mineral content of foods like tomatoes and capsicums are unaffected by irradiation at doses up to 1 kiloGray (kGy). The weight of evidence in the Report also indicates that at such doses, "differences in vitamin concentrations between irradiated and non-irradiated fruit are within the range of the vitamin losses that normally occur during the storage of non-irradiated fruit" and that "other food processing techniques have been demonstrated to have a larger impact on the vitamin content of fruits and vegetables than irradiation" (Report Summary).

Given that there are "no significant effects of irradiation on nutrient levels" (p.46 of FSANZ Report), and the minimal impact on the dietary intake of vitamins in the Australian and New Zealand population under the worst case scenario (see Dietary Intake Assessment section of the Report), it appears that the irradiation of tomatoes and capsicums would not constitute any concern for the nutritional adequacy of Australian and New Zealand diets.

With respect to consumer reaction to food irradiation, we wish to draw your attention to the New Zealand and US marketplaces. The availability of irradiation as a phytosanitary measure has opened up trade between Australia and New Zealand in mangoes and litchis. Growing volumes of irradiated tropical fruit are now successfully being sold in New Zealand, a market that was previously shut to the horticulture industry in northern Australia due to quarantine restrictions on fruit fly host material.

Similarly, a market for tropical fruits from several developing countries has been opened in the USA as a result of approvals for imported irradiated fruits.

The consumer and retailer acceptance of irradiated mangoes in New Zealand is high. Irradiated mangoes are now considered a mainstream product sold successfully in supermarkets and other fresh produce retail channels.

Food irradiation has given New Zealand consumers choice in tropical fruits where previously they had relied on often lower quality produce originating from Central and South America. As per FSANZ requirements the irradiated mangoes are sold in New Zealand with labels identifying they have been treated with ionising radiation. They are sold alongside non-irradiated products from other countries.

The irradiated Australian mangoes are generally priced at a premium in New Zealand over the other origin product. According to the trade, the growth in Australian mangoes is based on consumers seeking a higher quality product and possibly greater confidence in the food safety origins of fresh produce originating from Australia. The success of the export of Australian irradiated tropical fruits to New Zealand confirms consumers are willing to purchase irradiated foods, particularly when it offers an advantage to them such as product quality and chemical residue free status.

The export trade to New Zealand also highlights the commercial opportunities for increased domestic and international trade offered by food irradiation for the Australian horticulture sector as noted by the FSANZ Report. FSANZ may also wish to note that, since the restrictions on dimethoate use have come into force in October 2011, no Australian tomatoes or capsicums may be exported to New Zealand until an alternative quarantine treatment has been approved.

In conclusion we would like to restate that not only is irradiation safe, it is technologically justified as it is effective against a broad spectrum of pests that create quarantine barriers for the tomato and capsicum industries. Moreover, irradiation is a commercially attractive phytosanitary measure for the industry as it is a non-invasive process that does not negatively impact food quality, leaves no chemical residues and is cost competitive.

Based on the above, we support FSANZ's proposal to amend the Code to permit the irradiation of tomatoes and capsicums.

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Yours faithfully,  
**Steritech Pty Ltd**

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Chief Executive Officer