

8 October 2014

Project Manager
Application A1092
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear sir/madam,

**Application A1092: Irradiation of Specific Fruits & Vegetables
Calls for Submissions**

This is in response to the Call for Submissions in relation to Application A1092 – Irradiation of Specific Fruits & Vegetables.

By way of background, the Food & Beverage Importers Association (FBIA) is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia

FSANZ is proposing to amend Standard 1.5.3 – Irradiation of Food to permit the irradiation of apple, apricot, cherry, honeydew, nectarine, peach, plum, rockmelon, scallopini, strawberry, table grape and zucchini (courgette). The proposed amendment would permit the irradiation of these fruits and vegetables by adding them to the Table to clause 4 in Standard 1.5.3 with a minimum dose of 150 Gray (Gy) and a maximum dose of 1 kGy.

The FBIA strongly supports the draft variation to the Code proposed by FSANZ.

Our support for the proposal is based on these considerations:

1. These fruits and vegetables are potential hosts to fruit flies and other regulated pests and so, effective phytosanitary treatments are essential for international and domestic trade in tomatoes and capsicums.
2. There is a need for an effective and cost efficient alternative to the two commonly used insecticides (dimethoate and fenthion). Reviews of these chemicals by the Australian Pesticides and Veterinary Medicines Authority (APVMA) have resulted in their use being restricted, suspended or withdrawn.

Food & Beverage Importers Association

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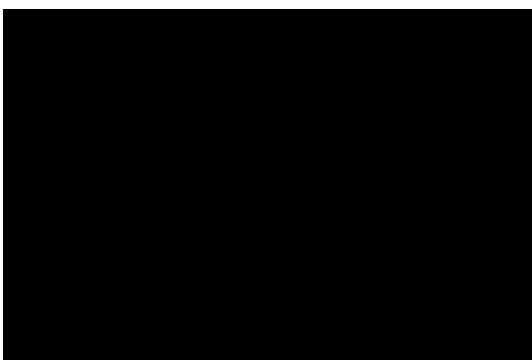


3. Irradiation is recognised as an effective and legitimate phytosanitary treatment by the International Plant Protection Convention (IPCC) and biosecurity agencies in Australia, New Zealand and the United States of America.
4. Without permission in the Food Standards Code for irradiation of these fruits and vegetables, it would be pointless to apply to biosecurity agencies for specific acceptance of irradiation as an effective and efficacious treatment to meet biosecurity and quarantine concerns.
5. The risk assessment conducted by FSANZ shows that irradiating these fruits and vegetables as permitted by the draft variation to the Code would not pose a human health risk for consumers in Australia or New Zealand.
6. Permitting the irradiation of the specified fruits and vegetables will allow domestic and international trade in tomatoes and capsicums to continue without disruption.

In view of the above matters, we believe Option 1 meets the objectives set out in Section 18 of the Food Standards Australia New Zealand Act 1991 and therefore, should be adopted.

Should you have any questions on this submission, please do not hesitate to contact me

Yours faithfully,



A J Beaver
Director