



December 24, 2020

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Food Standards Australia New Zealand
PO Box 5423
KINGSTON ACT 2604

Dear FSANZ Review Committee,

RE: A1193 - Irradiation as a phytosanitary measure for all fresh fruit and vegetables: to extend the option of phytosanitary irradiation to all types of fresh fruits and vegetables

NASSA Organic welcomes the opportunity to comment on the proposal to expand the irradiation of Australian produce.

The National Association for Sustainable Agriculture Australia (NASAA) plays a critically important role in supporting and promoting the adoption of sustainable agricultural practices that lead to safer and more sustainable food production systems. The association was formed in 1986 to support the development and education of the organic industry and consumers about organic, biodynamic and sustainable agricultural practices.

NASAA Organic has developed an enviable reputation as a ground-breaking and innovative organic industry association that is forward thinking and actively looks to progress the organic industry for the benefit of members and the industry in general.

NASAA Organic continues to be at the forefront of organic industry development. It was the first organic industry association in Australia, the first to develop an Organic Standard, and the forerunner in establishing strong international trading ties for organic exports, which includes establishing accreditation with IFOAM—Organics International. In recent years, this includes being the first organic industry association to open more affordable access to organic trading markets in China.

Our subsidiary business, NASAA Certified Organic (NCO), certifies organic commodities to meet all domestic and international export market requirements. This covers over 1300 NCO operators (including 230 certified overseas).



In light of this information, I trust FSANZ notes the basis of which we supply our information and concerns from the operational sector that will be most affected by any changes to the current arrangements.

I would also like to write and reference the proposal put forward by Gene Ethics

Yours sincerely,

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Current allowances noted

The Australia New Zealand Food Standards Code (the Code) sets the standards for food irradiation in Australia and New Zealand under Standard 1.5.3 Irradiation of food.

Where a food is permitted to be irradiated, any of the following forms of ionising radiation:

- (a) gamma rays from the radionuclide cobalt 60;
- (b) X-rays generated by or from machine sources operated at an energy level not exceeding 5 megaelectronvolts;
- (c) electrons generated by or from machine sources operated at an energy level not exceeding 10 megaelectronvolts.

Allowances for re-irradiation under certain conditions

Food that has been irradiated may be re-irradiated if any of the following conditions is met:

- (a) the food is prepared from food, including ingredients, that have been irradiated at levels that do not exceed 1 kGy;
- (b) the food contains less than 50 g/kg of irradiated ingredients;
- (c) the required full dose of ionising radiation was applied to the food in divided doses for a specific technological reason.

Non- permitted for use in the National Standard for Organic and Bio - Dynamic Produce Edition 3.7

The National Standard for Organic and Bio - Dynamic Produce Edition 3.7 does not permit use of irradiation.

At present, the only method by which an Australian consumer or handler can be certain a product is truly organic is to look for a certification mark. There are currently six marks used within Australia, each mark is attached to a certification body approved by Department of Agriculture, Water & Environment (DAWE) to the National Standard for Organic and Bio-Dynamic Produce (National Standard/NS) under the Export Control Act 1982 (Cth) (Export Control Act).

Currently, Australian organic producers export to 81 countries via the use of Organic Produce (Export) Certificates (OPCs). This provides surety for the buyers in those markets that the produce they are purchasing adheres to the rigorous certification and audit processes as set out in the NS.

Irradiation is defined in the National Standard for Organic and Biodynamic Produce (Department of Agriculture) as follows:

ionising radiation (irradiation): means the use of high energy emissions capable of altering a food's



molecular structure for the purpose of controlling microbial contaminants, pathogens, parasites and pests in food, preserving food or inhibiting physiological processes such as sprouting or ripening.

Section 2.3.8 states:

Irradiation is not permitted in the processing, storage or handling of products complying with this Standard.

Supply Chain Disruption and Direct Market access issues

As reported in *the Australian Organic Market Report, 2019* (attached) the Australian Organic Industry is currently worth \$2.6 billion, growing year on year since market data has been reported.

- Domestic sales in 2018 grew 15% vs the previous year
- Export tonnage was up 13% over the same period

Industry consumer data shows Australian shoppers are purchasing more organic products at a growing rate

- 6 out of 10 shoppers have purchased organic products in the past 12 months

Extension of the use of irradiation, if made compulsory, will significantly certified operators who invest time and resources to maintain the integrity of organic products in the marketplace.

Those certified organic products heading into export markets may also be compromised in their ability to now access those markets.

Consumer choice

While FSANZ notes that it may dismiss the concerns raised based on the premise that consumer choice is not a basis for scientific review, but it must be noted the market for certified organic food exists because many people around the world mistrust many practices used in the conventional food system and choose to avoid augmented practises in the food chain of their food.

They are seeking the use of best practice in the productions of fresh fruit and vegetables, which also extends to the way the product is treated post-harvest.

Whether you agree with these views or not, the Organic Industry is market driven and continues to grow rapidly, and now makes an unequivocal contribution to sustainable food production, based on the social licence afforded it by the community.

NASAA ORGANIC

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Labelling for consumer choice

NASAA Organic notes the labelling protocols that are in place for foods that have undergone irradiation treatments

However would also highlight that wholesale trade of products through large markets (such as Victoria's Queen Victoria Markets), may see the dilution in the integrity of product being labelled appropriately at point of sale.

If the proposal is accepted for use

In the event an extension of use of irradiation is accepted by the Review Panel, then collaborative works with the industry MUST be part of the implementation, with sufficient lead time for the industry to work with the various Commonwealth and States Biosecurity Departments to ensure a phytosanitary alternative is provided for organic producers.

Failure to do so is likely to compromise the commercial viability of businesses, leading to market failure of the practise.



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

On the grounds that :

It would adversely affect the ability of trade for certified organic producers.

Irradiation of apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash would adversely affect the nutritional value and safety of significant components of the Australian and New Zealand food supplies.

The Queensland government has a clear conflict of interest by being both the applicant for A1092 and, as a member of the Legislative and Governance Forum on Food Regulation, being one of the final arbiters of the decision on its own application.

The nutritional and safety assessment process lacks scientific rigour, relying heavily on unpublished non-peer-reviewed research submitted by the applicant.

FSANZ ignores the numerous alternatives to irradiation that exist for achieving the stated phytosanitary goals of A1092.

In its cost/benefit statement, FSANZ inflates the claimed benefits of approving A1092 while diminishing the impacts of the known hazards, risks and costs of irradiating apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, strawberries, table grapes, zucchini and squash - impacts that the whole community will bear.

Labelling requirements are weak and there is no way to visually distinguish between irradiated and non-irradiated foods. Thus shoppers depend on the integrity and comprehensiveness of irradiation labelling.

As there is no simple, reliable and affordable test for irradiated foods, it is difficult for state and local authorities to monitor them in the marketplace and to enforce the labelling requirements.

Despite FSANZ' claim, there is no reliable and contemporary evidence that the Australian and New Zealand public are aware of, or will consent to, the widespread irradiation of the fresh fruit and vegetable supply;



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.