



21st December 2020

Application A1193 Irradiation as a phytosanitary measure for all fresh fruit and vegetables

Dear FSANZ,

Australian Table Grape Industry (ATGA) is the peak industry body representing Australian table grape growers. The industry exports over 70% of annual production resulting in 152,000 tonnes being exported worth 623 million to over 40 countries. 95% of exports come from Victoria. The industry is also responsible for supplying over 70% of all table grapes consumed in Australia and New Zealand

Australian table grapes are regarded as a seasonal product and a core item in the fresh produce section. Australian grape production benefits from unique and protected environments with limited pests of concern. There are a number of domestic markets that are fruit fly sensitive including South Australia, Tasmania and Western Australia. New Zealand is similarly fruit fly sensitive and relies on summer imports from Australia.

All of these markets require endpoint treatments to effectively meet commercial and biosecurity requirements. The vast majority of table grapes are traded using cold disinfestation which is a slow two to three week process where fruit is held at extremely cold temperatures. This can be detrimental to some varieties and cause abrupt gaps in supply when fruit is sold out and next available fruit is still suspended in cold disinfestation. In these situations, industry has traditionally relied on Methyl Bromide as a rapid treatment but is damaging to both the fruit and the environment, recognised Ozone depleting gas.

To ensure consistent and reliable supply of fresh table grapes as well as pursue excellence in sustainability as an industry, Australian table grape growers increasingly utilise phytosanitary irradiation in place of Methyl Bromide.

Unlike commodities such as Kiwifruit, pomegranates and citrus which yet to be approved, table grapes have had the privilege of being able to utilise irradiation for many years now. Many Australian table grape growers also grow citrus and other yet to be approved crops. It is distressing to think that's such a sustainable and effective biosecurity tool can only be used on a limited number of products. In the event of a foreign or exotic pest incursion, the inability to use irradiation as a



generic treatment for all fresh produce places the entire Australian horticultural industry at unnecessary and great risk.

ATGA has been one of the strongest and longest serving supporters of phytosanitary irradiation, recognising the science based merits of the treatment. We have similarly heard for years the unfortunate and unfounded opinions that consumers would not eat irradiated table grapes. This is completely untrue in every case of commercial trade where table grapes have used irradiation. In fact, the treatments ability to deliver a fresher higher quality product has had a positive impact on consumption of fresh Australian table grapes in markets such as New Zealand and Vietnam.

2019/20 was the first season Australian table grapes were able to utilise irradiation to enter the New Zealand market. While only approximately 20% of product was irradiated it still accounted for over 1,000,000 bags of fresh table grapes, each of which was individually and clearly labelled for the consumer. These grapes were successfully sold and consumed in New Zealand with no reported concerns or complaints.

The majority of the 20% of irradiated trade was in compliment to existing cold disinfestation enabled trade. It filled gaps where there was limited supply due to the cumbersome and slow nature of cold disinfestation. Without a fast and flexible irradiation treatment option, much of this additional 20% of fruit would have not made it into the New Zealand consumer's diet.

While table grapes are already approved under standard 1.5.3, I cannot emphasise how important it is for the development and security of all Australian horticulture that this application is successful. Irradiation is one of the greatest modern developments for biosecurity and fresh produce trade. It replaces older chemical and fumigant treatments that for a number of reasons have a diminishing justification for use in trade.

If you require further comment or clarification, I am willing to assist by answering questions and providing further perspective.

Sincerely,

[Redacted signature]

[Redacted contact information]