

[REDACTED]

From: submissions
To: [REDACTED]
Subject: RE: Submission:Comments re A1193

From: [REDACTED]
Sent: Thursday, 10 December 2020 10:27 PM
To: submissions <submissions@foodstandards.gov.au>
Subject: Submission:Comments re A1193

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Irradiation as phytosanitary measure for all fresh fruit and vegetable

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[REDACTED]

As a Queensland citizen I am concerned to learn that our government/Agriculture Department is seeking permission to irradiate all 'fresh' fruits and vegetables and have the following comments:

Safety and Dietary Impact

The arguments in this section of the A1193 Executive Summary are concerning.

- The section acknowledges reduction of food quality due to irradiation, especially vitamins.
- It also argues that overall dietary nutritional content for Australian's and New Zealander's will not be adversely affected by the irradiation of foods because the estimated proportion of the population's diet comprised of irradiated foods will be low. The suggestion that food irradiation does indeed reduce the nutritional value of the irradiated food is strongly implicit in this argument.
- In addition, the assurance of preserving adequate nutrition from food is based on an estimate only, of proportion of overall food to be consumed. How will this proportion be monitored and regulated? Will there be limits on the amount/proportion of irradiated food to be allowed into the food supply? What about individual members of the population who inordinately consume greater amounts of irradiated food due to their particular source of supply? And will adequate labelling requirements be instituted and remain in place so that consumers can make informed choices about the foods they buy?

The safety of food irradiation was brought under question due to adverse neurological effects observed in pets eating irradiated pet food. This problem has been well publicised and is reflected in the RSPCA's policy on irradiated pet food: <https://kb.rspca.org.au/knowledge-base/what-is-rspca-australias-position-on-the-irradiation-of-imported-pet-food-products/>

Furthermore, a 2003 overview of multiple studies examining the effects of irradiated food on humans and animals provides considerable evidence to suggest that we should be concerned about the effects of food irradiation on health. (See '*Questioning Food Irradiation: A History of Research into the Safety of Irradiated Foods*,' Public Citizen, Critical Mass Energy and Environment Program Washington D.C. April 2003)

The government has now banned irradiated cat food. In view of this, why is it acceptable to permit the expansion of food irradiation for humans?

Other Treatments are Available

A range of clean and healthy alternatives to food irradiation, both for extending shelf life and for 'sanitising' food are available, including Cold storage, Cold treatment, Heat/steam, vapour treatment, Hot water dips, Atmospheric control with oxygen, carbon dioxide or nitrogen, Physical disinfestation, i.e. cleaning, washing, Hygienic and safe production practices, Pest exclusion zone, Early harvesting, Organic production. (See: <http://foodirradiationwatch.org/index.php/alternatives-to-irradiation/> for Australian success stories). As a citizen, I request proper consideration of these alternatives, in line with the precautionary principle, given the detrimental effects of irradiated food as outlined above.

Concerns About Labelling

Current Labelling requirements for irradiated food are weak and the future of labelling of all irradiated foods is not assured. There is no way for consumers to visually distinguish between irradiated and non-irradiated foods. Thus, shoppers depend on the integrity and comprehensiveness of irradiation labelling. Under current laws, there is no specified wording required for the labelling statement, leaving the messaging up to the company. Neither the word 'radiation' nor 'irradiation' is required.

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 what labelling requirements we *do* have.

As a citizen I request that a clear and stringent labelling policy should be developed and applied for all irradiated foods, so that consumers can make informed choices about the food they are eating.



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