



24 December 2020

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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the *Call for Submissions – Application A1193 Irradiation as a phytosanitary measure for all fresh fruit and vegetables*.

Yours sincerely

Katherine Rich  
**Chief Executive**



***Call for Submissions – Application A1193  
Irradiation as a phytosanitary measure for  
all fresh fruit and vegetables***

**Submission by the New Zealand Food & Grocery  
Council**

**24 December 2020**

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## **NEW ZEALAND FOOD & GROCERY COUNCIL**

1. The New Zealand Food & Grocery Council (“NZFGC”) welcomes the opportunity to comment on the *Call for Submissions – Application A1193 Irradiation as a phytosanitary measure for all fresh fruit and vegetables*.
2. NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. This sector generates over \$40 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$34 billion in export revenue from exports to 195 countries – representing 65% of total good and services exports. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 45% of total manufacturing income. Our members directly or indirectly employ more than 493,000 people – one in five of the workforce.

### **The Application**

3. An application has been made by the Queensland Department of Agriculture and Fisheries (QLD DAF) for an amendment to Standard 1.5.3 Irradiation of Food (the Standard) in the Australia New Zealand Food Standards Code (the Food Standards Code). The amendment would replace the list of 26 fruits and vegetables in the table in Division 2, section 1.5.3—3(2) of the Standard, with “fresh fruits and vegetables”.
4. The application covers all the fresh fruits and vegetables currently described in Schedule 22 of the Food Standards Code as well as any other fresh product understood to be a fruit or vegetable grown worldwide. The application excludes dried pulses, legumes, nuts and seeds. The purpose of the irradiation of fruits and vegetables (pest disinfection for a phytosanitary objective) and the minimum and maximum absorbed doses for fruits and vegetables (150 Gy and 1 kGy, respectively) will remain the same as currently set out in Division 2, section 1.5.3—3(1) of the Standard.

### **COMMENTS**

5. NZFGC is strongly supportive of the proposed amendment to the Standard. We have, for some years, suggested a broad application of irradiation in the Food Standards Code when required for biosecurity reasons of fresh fruit and vegetables instead of awaiting applications for individual fruits and vegetables.
6. QLD DAF notes that the international trade of irradiated fresh produce has evolved during the last decade. The initial trans-Tasman trade in irradiated mango in 2004 was the first truly international trade in irradiated fresh produce. Since then, phytosanitary irradiation has become firmly established as a phytosanitary measure of choice between many trading partners following international agreement of standards of irradiation by Codex and the IPPC (the International Plant Pest Convention). Irradiation is an approved treatment in more than 60 countries including for fresh fruit and vegetables. According to the USDA, there are now at least 15 countries trading over 40,000 tonnes of irradiated produce annually.
7. We are pleased to see that FSANZ has made a notification to the WTO to alert trading partners to the significant extension of the use of irradiation for fresh fruit and vegetables as this is a strong signal of the regions willingness to embrace this technology more broadly.

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8. NZFGC notes that FSANZ reviewed the technological justification (pest disinfestation) as it has done 26 times previously and found the treatment an appropriate and efficacious phytosanitary treatment for a range of pests including fruit fly, at the proposed dose range. Similarly, FSANZ's toxicological assessment concluded there were no safety concerns at the dose levels proposed and its nutrition risk assessment concluded that irradiated fresh fruit and vegetables had a low risk of any loss of nutritional quality and that any impact on population intakes would be minimal. Given that neither the Australian nor New Zealand population consumption of fresh fruit and vegetables is below recommended levels, any nutritional loss of irradiated fruit and vegetables is of significantly less concern than measures to increase consumption.
  9. Overall, NZFGC notes that FSANZ concluded there were no public health and safety concerns with the consumption of any fresh fruit and vegetables that have been irradiated at doses up to 1 kGy.
  10. As noted at the outset, NZFGC is strongly supportive of the application and supports the proposed amendments to the Food Standards Code set out in Attachment A to the Call for Submissions document whereby the existing permissions for 26 fruits and vegetables are replaced by a generic permission for all fresh fruit and vegetables. The drafting proposed excludes dried pulses, legumes, nuts and seeds but retains the existing dose range of 150Gy – 1 kGy and the technological purpose (pest disinfestation for a phytosanitary objective).
  11. We continue to be concerned at the use of Schedule 22 which has its major application within the Food Standards Code for Australia-only maximum residue limits (MRLs) and continue to believe these 'multipurpose' provisions should be stand-alone to avoid confusion and improve transparency of application.
  12. In future, we would like to see the requirement for labelling irradiated fruit removed since the public health and safety of such produce is now clearly established. Labelling is an unnecessary cost for both industry and consumers to bear.