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SUBMISSION ON APPLICATION A1092
IRRADIATION OF SPECIFIC FRUITS AND VEGETABLES

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INTRODUCTION

Horticulture New Zealand (HortNZ) represents the interests of 5,500 commercial fruit and vegetable growers throughout New Zealand.

HortNZ has taken a keen interest in the changes to approved biosecurity treatments in Australia, principally due to our concerns about the adequacy of biosecurity treatments (primarily considered by the Ministry for Primary Industries in New Zealand) and the potential impacts any new treatment will have on consumer perceptions and behaviour.

We have three major issues we wish to focus on in these submissions:

- issues around consumer choice and labelling;
- the impacts on nutrition and vitamin content; and
- issues around the assessment impacts.

EXECUTIVE SUMMARY

1. We strongly support either product or point of sale labelling of irradiated products to provide consumer choice.

2. In recommending labelling of products to provide consumer choice, the proposal and assessment have failed to address the fact that a significant volume of these products are consumed via the catering, restaurant and institutional channels in things like fruit salads, juices and smoothies. No consideration has been given to how these consumers will be informed that the products they are being offered/are eating are irradiated.

3. The research quoted (section 4.1 of Supporting Document 2) shows a potential reduction in water soluble irradiation-sensitive vitamins (e.g. thiamine, vitamins C and E and B-carotene) yet this does not appear to have been addressed in the analysis. While we accept that similar variations in vitamin C levels result from processing it should be noted that most of the products covered by this application are consumed raw. The variation in other vitamins has not been addressed. Just because vitamin C levels vary with cooking does not automatically mean that others do too.

4. While the impact on nutritional and vitamin content for individual products may be small, the approval sought covers a wider range of products than ever before, some are a key part of many New Zealanders and Australians diets. Given the proposed larger number of irradiated products and that many of them are a key part of the New Zealand and Australian diet, there is potential for a greater impact on the nutritional adequacy provided by these products from both a combined and cumulative perspective. There is no evidence presented to support the conclusion that nutritional adequacy from consumption of both the currently permitted foods and the requested foods will not be significant.

5. No consideration has been given to the increased level of exposure that this approval could create for persons who have high levels of raw fruit and vegetable consumption.

6. The assessment of the potential negative impacts on industry is cursory and inadequate. For example, the impacts on industry in terms of a negative consumer response to irradiated product and potential market share loss has not been researched or assessed.

DETAILED COMMENTS

Consumer choice and labelling

HortNZ strongly supports the need for mandatory labelling of irradiated tomatoes and capsicums (as outlined in section 3.2 of Supporting Document 1) to provide informed choice for consumers.

HortNZ is however concerned about the enforcement of existing mandatory labelling requirements for irradiated tropical fruit and tomatoes in New Zealand, particularly at weekend markets and small retailers. It appears to us that the current labelling regime is not well enforced and therefore consumers are not receiving the information as agreed by FSANZ.

While mandatory labelling is effective in conventional retail and supermarket channels, increasing volumes of fresh produce are entering into the catering, foodservice, fast food, hotel and institutional channel. In these circumstances FSANZ needs to clearly explain and communicate that the current rules extend to labelling on menus and other information provided to consumers e.g. websites. This will ensure the provision of sufficient information relating to food to enable consumers to make informed choices. As HortNZ has concerns about the current level of enforcement with regard to existing labelling requirements there would be a need for additional resource to monitor and enforce these scenarios.

The impacts on nutrition and vitamin content
While we accept that changes to nutritional and vitamin content caused by irradiation of these products poses no human health risk, we are still concerned that treatment will reduce the levels of these beneficial compounds.

Many consumers choose to eat fresh produce due to the positive health benefits and the industry invests a substantial amount of funding to promote these. It is critical that this aspect of our industry is protected.

FSANZ will be aware that there is a reasonably strong level of consumer pushback towards irradiated products. The fact that this application includes a number of products that constitute a significant portion of our overall dietary intake is very significant. Based on consumer spend apples are the second most popular fruit and summerfruit taken as a collective group are the third most popular fruit.

Supporting Document 2 section 4.1 refers to the effects of irradiation being *"no greater than other forms of food processing"*. A critical point is that by far the majority of people that buy and consume the products included in the application eat them in a fresh ripe state when the nutritional value is at its highest. With irradiated food this nutritional level is compromised.

We do not believe that the assessment undertaken has adequately assessed the potential impacts of this.

We are concerned that no evaluation of the additional impacts of allowing commonly consumed food to be added to the list of products that can be irradiated has been undertaken. It is noted that FSANZ have relied heavily on previous evaluations that have been undertaken. These evaluations are not specific to the produce listed with regard to change in nutritional content as a result of irradiation treatment. Neither, do the evaluations take into account specific nutrients provided by these types of produce and their contribution to total dietary intake. With the broader range of products and subsequent greater contribution to dietary intake the potential for decrease in nutritional content in total dietary intake is greater following irradiation treatment.

Section 4.2.2 of Supporting Document 2 references unpublished papers presented by the applicant. It is dangerous to rely on these papers that have not been subjected to normal peer review processes. We believe any information in unpublished papers should be discounted.

Ends