

The National Organisations for Fruit and Vegetable Growers



New Zealand
Fruitgrowers

New Zealand
Vegetable and Potato
Growers' Federation
Inc

Vegfed

SUBMISSION ON APPLICATION A443 - IRRADIATION OF TROPICAL FRUITS, BR EADFRUIT, CARAMBOLA, CUSTARD APPLE, LITCHI, LONGAN, MANGO, MANGOSTEEN, PAPAYA AND RAMBUTAN

INTRODUCTION

This submission is made on behalf of:

New Zealand Fruitgrowers Federation
New Zealand Vegetable & Potato Growers Federation
New Zealand Berryfruit Growers Federation

The above organisations represent the interests of New Zealand's 7,000 commercial fruit and vegetable producers.

The horticulture industry is a major export earner, with \$2 billion in export sales during the year ended 31 December 2001. The industry also supplies the majority of fruit and vegetables consumed on the New Zealand domestic market, employs directly in excess of 50,000 people and contributes significantly to regional development and the health and well-being of New Zealanders.

EXECUTIVE SUMMARY

The Federations:

- 1 Support the compulsory labelling of all irradiated product sold in New Zealand but believe that specific provision must be to ensure point of sale labelling is legible.
- 2 Support the decision not to allow the use of the words "electronic pasteurisation" on labelling.
- 3 Question the technical justification for this application, which is based on the use of this irradiation treatment to disinfect tropical fruit to enable quarantine access to New Zealand markets. Irradiation of tropical fruit is not a process that has been approved by MAF Biosecurity and therefore cannot be used to disinfect tropical fruit to enable its access to New Zealand markets.
- 4 Despite the comments in the draft assessment report we believe that this application cannot be considered by Food Standards Australia New Zealand until MAFNZ has approved the irradiation of tropical fruit as a biosecurity treatment. If MAFNZ approval is not granted then there is no technical need and any approval given by Food Standards Australia New Zealand will be in breach of its own standard.

- 5 Australian Growers manage Fruit fly through the implementation of various field and packhouse production processes. Food Standard 1.5.3 Irradiation of Food states “Food should not be processed by irradiation as a substitute procedure for good manufacturing practices.” If approved, there is no indication that irradiation will not replace good production processes. Nor is it clear if the third condition of approval (requiring good manufacturing process) will apply to agricultural practices or how this will be policed.

LABELLING

There is significant consumer concern within New Zealand regarding irradiated food. It is essential that consumer choice be maintained through the clear labelling of irradiated produce.

We fully support the decision not to allow the use of the words “electronic pasteurisation” on labelling.

Many fruits and vegetables are sold loose and therefore it is essential that the labelling not only be on packaging but also be required at the point of sale. Many point of sale signs for produce are prepared by hand and therefore the Standard should specify the minimum size of this labelling to ensure that consumers are able to read the labelling and make informed decisions.

There is a major problem with point of sale rather than product labelling in terms of policing and it is important that a pro-active policing programme is put in place if this application is approved.

TECHNICAL JUSTIFICATION

The Federations note that the applicant has stated that the approval of irradiation for these tropical fruits would provide an alternative treatment to existing techniques and facilitate access to New Zealand markets for Australian tropical fruit growers. This purpose is also used as the technical justification for the application.

Food Standard 1.5.3 Irradiation of Food states “Even where this Standard permits irradiation, food should only be processed by irradiation where such processing fulfils a technical need or is necessary for a purpose associated with food safety”.

The Federations have discussed this issue with the MAFNZ that has advised the disinfestations of tropical fruit through irradiation is not an accepted biosecurity procedure for tropical fruit being exported from Australia to New Zealand. The Draft has acknowledged this situation.

In the absence of the approval of irradiation of tropical fruit as a biosecurity treatment, there is no technical justification for Food Standards Australia/New Zealand to approve this process. In fact if this approval was given today, the process could not be used to export fruit to New Zealand.

Despite the comments in the draft assessment report we believe that this application cannot be considered by Food Standards Australia New Zealand until MAFNZ has approved the irradiation of tropical fruit as a biosecurity treatment.

GOOD AGRICULTURAL PROCESS

Australian Growers manage Fruit fly through the implementation of various field and packhouse production processes. These include field sprays, pest monitoring, pest trapping, removal of unwanted host plants, packhouse inspections, fumigation and the use of protective packaging.

Food Standard 1.5.3 Irradiation of Food states “Food should not be processed by irradiation as a substitute procedure for good manufacturing practices.” If approved, there is no evidence in the draft that irradiation will not replace good production processes that are currently (or should be) used by Australian growers. We note that the third condition requires the use of “good manufacturing process” but it is not clear if this condition will apply to agricultural practices, what these processes are or how their use will be policed.

ALTERNATIVE TREATMENTS

The last sentence of the first paragraph of the recommendation on page 33 of the Draft states:

“Overall, benefits may be achieved through the use of this technology as an alternative to the existing technologies which currently do not meet MAFNZ requirements”

We fail to see how this can be correct.

This application is based on the use of irradiation as a biosecurity treatment. If other technologies do not meet MAFNZ requirements then this technology does not replace them because this technology aims to meet those MAF requirements. If the technology does not meet these requirements then there is no technical need and any approval given by Food Standards Australia New Zealand will be in breach of its own standard.

Australian tropical fruit can be exported to New Zealand now. This technology is seeking to replace processes that have already met the requirements of MAFNZ. Although as noted earlier this MAFNZ approval is still required and will be subject to industry consultation. It cannot be assumed that this approval will be given and no benefits will be achieved if it is not granted.

FOR FURTHER INFORMATION

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