



10 September 2014

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Dear Sir/Madam

**RE: A1092: irradiation of apple and other fresh fruit and vegetables**

Apple and Pear Australia Limited (APAL) welcomes the opportunity to participate in the Food Standards Australia New Zealand (FSANZ) consideration of a draft food regulatory measure in relation to irradiation of a number of fresh fruit and vegetables.

APAL represents the interests of commercial apple and pear growers in Australia in matters of national importance including regulation and legislation, marketing, research and development.

APAL understands that an application has been made by the Queensland Department of Agriculture, Fisheries and Forestry to seek permission to irradiate apples along with a number of other fresh fruit and vegetables for phytosanitary purposes.

APAL supports the FSANZ recommendation that irradiation of apple fruit be permitted for inclusion in the Standard with the following requirements:


- irradiation is permitted only for the purposes of pest disinfestation for a phytosanitary objective;
- the permitted dose range should be a minimum dose of 150 Gy and a maximum of 1 kGy; and
- the current mandatory labelling of irradiated foods and record keeping requirements be applied.

APAL supports the recommendations on the grounds that:

- irradiation has been shown by the Queensland Department of Agriculture, Fisheries and Forestry to be efficacious in the disinfestation of fruit fly and other pests of quarantine concern to our trading nations;
- traditional and common alternate phytosanitary treatment measures have been lost as a result of the review of dimethoate and fenthion use by the Australian Pesticides and Veterinary Medicines Authority (APVMA);
- disinfestation of apple fruit by irradiation is a valid treatment for quarantine purposes and meets the requirements of a technological need (pest disinfestation) under the Food Safety Standard;

- insect pests such as fruit fly, light brown apple moth, thrips, mites, and mealybugs are of quarantine significance and are a major barrier in gaining access to some markets like Taiwan and China;
- the International Plant Protection Convention (IPPC), Codex Alimentarius and quarantine agencies in Australia, New Zealand and the USA, endorse irradiation as a legitimate phytosanitary treatment; and
- the scientific evidence assessed by FSANZ concludes that approval of irradiation of apple fruit at a minimum dose of 150 Gy and a maximum of 1 kGy does not pose a significant human health risk for Australian consumers.

Yours sincerely



John Dollisson  
Chief Executive Officer