

**Submission: A1092 , Irradiation of Specific Fruits and Vegetables.**

To the Food Standards Authority Australia New Zealand,

This submission to the Food Standards Authority Australia New Zealand is a show cause to the Regulatory body to act on consumer concerns regarding the dangers of irradiation and the need for mandatory labelling. FSANZ has in previous submissions failed to heed these consumer concerns preferring an industry bias which has "trade harmonisation" its main criteria at the expense of public health .

The blanket approval of the twelve fruit and vegetables enabled through A1092 is profoundly flawed. The suite of fruit and vegetables captured by A1092 fails to take into account different cellular reactions, reactive vitamin depletions, different skin hardnesses, different packaging requirements and different spoilage rates.

The hazards of irradiation of fresh fruit and vegetables are manifold. By its own research the Department of Agriculture, Fisheries and Forestry ( DAFF) recognises that B12, Vitamin A, Vitamin D, thiamine, riboflavin, niacin are in some way ("minimally ") affected by irradiation. DAFF, helpfully, suggests there are other dietary sources for these vitamins and minerals. DAFF also noted, different demographics adhere to these dietary needs; children source vitamin A from carrots , older people source it from milk and animal organs.

Further, DAFF states that *" vitamin changes were minimal or not significant between treated and untreated fresh produce. "* DAFF elaborates: *"Differences in the levels of irradiation sensitive vitamins ( beta – carotene and vitamin C ) for all the fruits and two vegetables were within the range of the vitamin losses that would have occurred during storage of non- irradiated fruit."* It fails to mention one of the major commercial advantages of irradiation is its shelf- life enhancer properties, therefore the finding is irrelevant. The use of *"fresh"* in this context is a blatant misnomer!

I urge you to reject this application and advocate strongly for mandatory labelling of fruit and vegetables that have been irradiated.

Jack Ingram.

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