

8th October 2014

Food Standards Australia New Zealand
P O Box 10559
The Terrace
WELLINGTON

Via email to: submissions@foodstandards.gov.au

Dear Sir/Madam

New Zealand Fresh Produce Importers Association Inc.
Submission on the *Application to irradiate 12 specific fruits and vegetables (apple, apricot, cherry, nectarine, peach, plum, honeydew, rockmelon, strawberry, table grape, zucchini and scallopini (squash) for phytosanitary purposes.*

The New Zealand Fresh Produce Importers Association Inc. (NZ FPIA) represents importers, wholesalers, distributors and retailers of imported fresh produce. The current NZ FPIA membership accounts for approximately 98% (by volume and value) of all fresh produce imported into New Zealand, including a large range of products from Australia. Four key objectives underpin all NZ FPIA activities:

- *Provide an independent forum for importers of fresh produce to discuss and advance issues of mutual interest in an environment that does not compromise the commercial activities of Members; and,*
- *Improve the access for fresh produce into New Zealand by ensuring that all import requirements are consistent, technically justified, commensurate with real risks and provide the least practical restrictions to trade; and,*
- *Be actively involved with the development of biosecurity (and other regulatory driven) decisions, policies and practices to ensure that Members' interests are represented and considered; and,*
- *Co-operate and build partnership arrangements with those parties who have an interest and influence in the importation of fresh produce into New Zealand.*

A special project fund has been established for agreed Association projects. These projects contribute to meeting one or more of the Association objectives. The NZ FPIA project funding pool has contributed to several projects relating to developing alternatives to dimethoate to maintain and enhance trade from Australia to New Zealand. This has included contributions to support the consideration of irradiation as a post-harvest treatment option for tomatoes, capsicums and a range of other commodities.

In relation to the current application to irradiate 12 specific fruits and vegetables (viz. apple, apricot, cherry, nectarine, peach, plum, honeydew, rockmelon, strawberry, table grape, zucchini and scallopini (squash) for phytosanitary purposes, the NZ FPIA:

1. *Agrees with the safety assessment conclusions contained in the assessment document; and,*
2. *Agrees that the use of irradiation as a post-harvest treatment for phytosanitary purposes poses no risks to consumers; and,*

3. *Supports the recommendations* to accept irradiation as a valid phytosanitary treatment for the 12 listed commodities.

The data provided via the application process, including similar supporting data from a range of other sources, shows that the consumption of irradiated produce is safe for consumers. There is already a history of safe consumption of irradiated foods, including fresh fruit and vegetables, in many countries. In a New Zealand context, this includes the ongoing importation, sale and consumption of irradiated mangoes, litchi, tomatoes and capsicums from Australia. The mango and litchi import programmes from Australia have grown significantly in volume and importance over recent years. Similarly, irradiated tomatoes and capsicums continue to fill an important winter market supply niche in New Zealand. The necessary infra-structure requirements in terms of irradiation facilities, equipment, operational procedures and commercial trade practices are already in place to quickly facilitate the addition of the aforementioned commodities into the irradiation treatment pathway. Furthermore, the required bilateral export-import phytosanitary systems and documentation frameworks (e.g. New Zealand import standards and bilateral quarantine arrangements) are already in place to include the irradiation treatment option for many of the listed commodities. Consequently, the NZ FPIA believes the application for irradiation should be approved as an extension to Standard 1.5.3 – Irradiation of Food.

In the future, the NZ FPIA also requests that FSANZ fast-tracks all future phytosanitary related horticultural applications and groups/assesses these as a generic group for phytosanitary treatment purposes. The results of the most recent assessments (and the others that preceded them) clearly demonstrates that there are no nutrient or food safety related issues associated with low dose irradiation treatments used for phytosanitary purposes. The use of a generic approval approach will not only speed up the application process but will greatly reduce the cost to industry that is currently required to fund the case-by-case nutrient analysis work and assessment processes. The available data covering a range of produce types collectively shows that the irradiation treatment of fresh produce for phytosanitary purposes has no detrimental impacts in terms of quality, nutrient content, nutrient composition or any other food safety concerns. There is no technological reason, or regulatory justification, for continuing with the commodity-by-commodity assessment approach.

The NZ FPIA looks forward to a favorable outcome from the FSANZ assessment process and the successful export of the affected commodities from Australia to New Zealand in the very near future. Furthermore, the NZ FPIA also looks forward to working closely with FSANZ on the “generic” (or grouped) application and assessment of horticultural commodities using irradiation as a post-harvest treatment as required.

Yours sincerely

Kevin Nalder
Chief Executive Officer
New Zealand Fresh Produce Importers Association Inc.