



15 March 2024

Food Standards Australia New Zealand  
by email to [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

## Application A1261 – Irradiation – Increase in maximum energy level

I wish to make comment on this Application on behalf of the Food Intolerance Network (FIN), which with over 21,000 current members is probably the largest consumer organisation focused on food in Australia.

In making this comment, I draw your attention to our last submission on this issue in December 2020 (A1193) appended.

The main question we raised in our earlier response was not answered, as usual.

- why is Australia the only country which refuses to actually insist on labels that the food is “irradiated” or “treated with ionising radiation” (as in the EU etc) and instead allows “**to the effect**” (Standard 1.5.3-9) that it has been irradiated with the potential to mislead consumers?

Our principal concern remains that there is clear and honest labelling.

- so why has a survey of our 21,000 members NEVER seen a label indicating any wording suggestive of irradiation?

Such a finding confirms that labelling of irradiated food is inadequate to ensure informed choice. FSANZ and ourselves know that interstate fruit and vegetables is already being irradiated sometimes. While FSANZ is not responsible for enforcement, how can FSANZ in any honesty approve this Application knowing that it is not enforced anywhere? Why not simply approve an Application that says “all produce shall be free of all insects pests and diseases” and not enforce that Application instead? That would be far cheaper for all concerned.

We would urge FSANZ to DELAY approving this Application until there has been further investigation of what appears to be deliberate dishonesty in labelling. Other than the labelling issue, consumers who engaged with the Network understood the advantages of this Application and have no substantive issues with the proposed increase in energy used.

Regards

A handwritten signature in dark ink, appearing to read 'H. Dengate', with a large circular flourish at the end.

Howard Dengate BSc (Food Sci UNSW), PhD (Plant Sci LC), Cert Plant-based Nutrition (eCornell)  
[www.fedup.com.au](http://www.fedup.com.au) PO Box 718, Woolgoolga NSW 2456 AUSTRALIA +61 408 801 490  
[confodnet@ozemail.com.au](mailto:confodnet@ozemail.com.au)

The Food Intolerance Network provides independent information about the effects of food on behaviour, health and learning in both children and adults, and support for families using a low-chemical elimination diet free of additives, low in salicylates, amines and flavour enhancers (FAILSAFE) for health, behaviour and learning problems. ABN 72 705 112 854

## **APPENDED PREVIOUS SUBMISSION**

### **A1193 – Irradiation as a phytosanitary measure for all fresh fruit and vegetables – comment made 3 December 2020.**

In consulting members, there was broad acceptance that phytosanitary irradiation does not pose any health threat in itself, and that phytosanitary irradiation causes negligible losses of micronutrients. The fact that irradiation replaces other fumigation practices that have known human health and workplace hazards and are ozone-depleting is a plus, although claims that this practice will lead to a reduction in other pesticides is not correct as irradiation is a post-harvest process used in conjunction with pesticides from planting through to harvesting.

We note that no other country in the world specifically call for the irradiation of apples, apricots, cherries, nectarines, peaches, plums, honeydew, rockmelon, table grapes, zucchini, squash etc and wonder why Australian consumers should be used as guinea pigs for this even wider use of irradiation?

There are strong consumer concerns about the honesty and enforcement of irradiation labelling in Australia and NZ. It is not acceptable to use the term “treated with ionizing electrons” when in fact gamma radiation and not ionizing electrons are used. The term “cold sterilisation” is deliberately misleading and is not acceptable. Nor is the term “Radurised” or the use of the Radura symbol supported since these are greenwashing and not honest. The relevant Food Standard must be amended to say “irradiated” or “treated with radiation”.

We note that in the EU any irradiated food or any irradiated food ingredient of a compound food must be labelled with the words “irradiated” or “treated with ionising radiation.” In the USA and Canada foods or ingredients must have the statement “treated with irradiation” or “treated by irradiation.” Australian consumers demand at least this level of protection. Codex Alimentarius requires that all irradiated foods be labelled.

From the point of view of consumers, the mandatory labelling of irradiated fruit and vegetables provides consumers with choice when it comes to purchasing or not purchasing irradiated fruit and vegetables. For us, it is essential that this labelling requirement is strengthened if there is to be a wider use of irradiation.