FOOD STANDARDS Australia New Zealand
Te Mana Kounga Kai – Ahitereiria me Aotearoa

06/03
18 December 2002

FINAL ASSESSMENT REPORT

APPLICATION A443

IRRADIATION OF TROPICAL FRUITS - BREADFRUIT, CARAMBOLA, CUSTARD APPLE, LITCHI, LONGAN, MANGO, MANGOSTEEN, PAPAYA AND RAMBUTAN

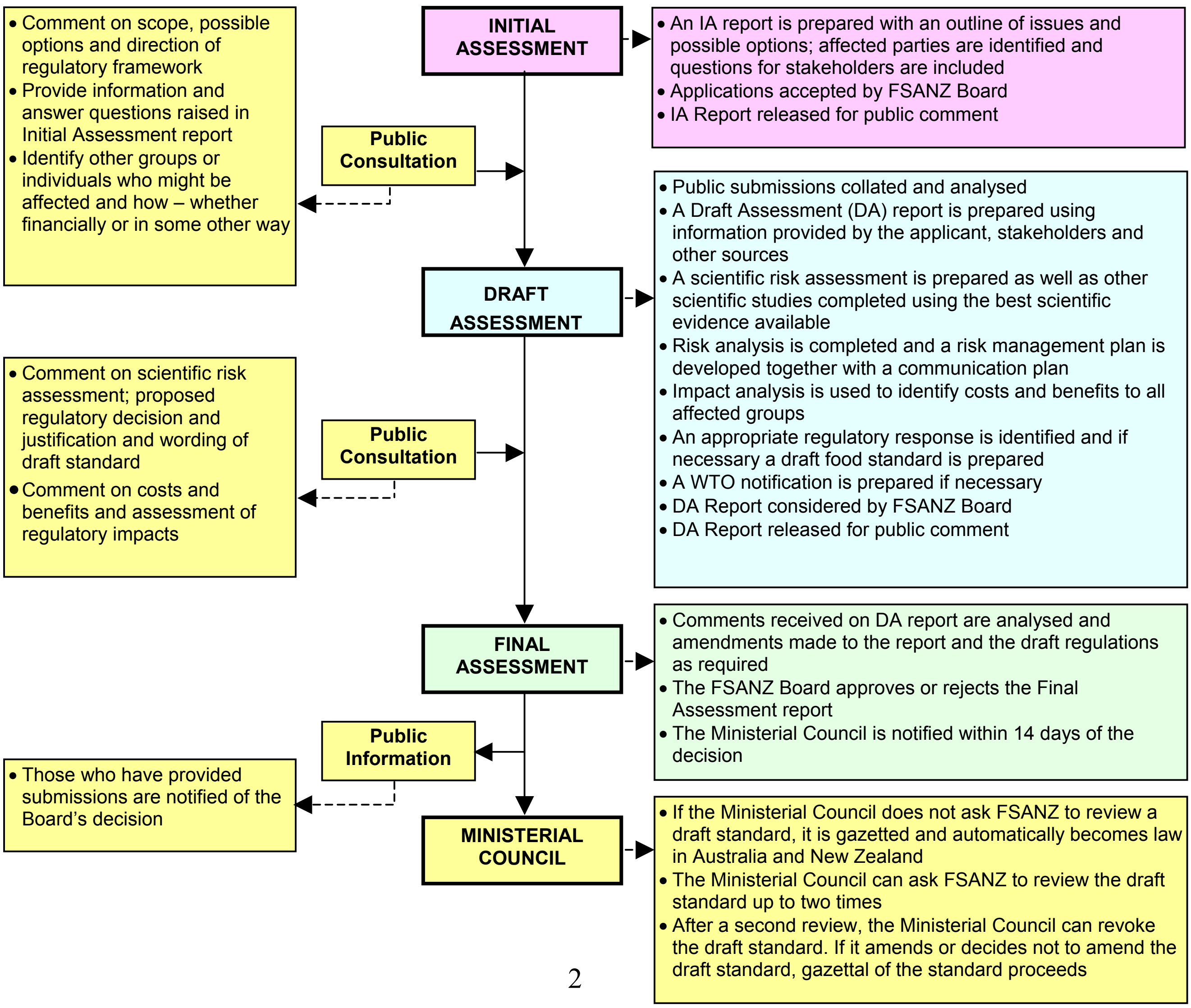
FOOD STANDARDS AUSTRALIA NEW ZEALAND (FSANZ)

FSANZ's role is to protect the health and safety of people in Australia and New Zealand through the maintenance of a safe food supply. FSANZ is a partnership between ten governments: the Commonwealth; Australian States and Territories; and New Zealand. It is a statutory authority under Commonwealth law and is an independent, expert body.

FSANZ is responsible for developing, varying and reviewing standards and for developing codes of conduct with industry for food available in Australia and New Zealand covering labelling, composition and contaminants. In Australia, FSANZ also develops food standards for food safety, maximum residue limits, primary production and processing and a range of other functions including the coordination of national food surveillance and recall systems, conducting research and assessing policies about imported food.

The FSANZ Board approves new standards or variations to food standards in accordance with policy guidelines set by the Australia and New Zealand Food Regulation Ministerial Council (Ministerial Council) made up of Commonwealth, State and Territory and New Zealand Health Ministers as lead Ministers, with representation from other portfolios. Approved standards are then notified to the Ministerial Council. The Ministerial Council may then request that FSANZ review a proposed or existing standard. If the Ministerial Council does not request that FSANZ review the draft standard, or amends a draft standard, the standard is adopted by reference under the food laws of the Commonwealth, States, Territories and New Zealand. The Ministerial Council can, independently of a notification from FSANZ, request that FSANZ review a standard.

The process for amending the *Food Standards Code* is prescribed in the *Food Standards Australia New Zealand Act 1991* (FSANZ Act). The diagram below represents the different stages in the process including when periods of public consultation occur.



Final Assessment Stage

The Authority has now completed two stages of the assessment process and held two rounds of public consultation as part of its assessment of this application/proposal. This Final Assessment Report and its recommendations have been approved by the FSANZ Board and are now being reviewed by the Australia and New Zealand Food Regulation Ministerial Council (ANZFRMC).

If accepted by ANZFRMC, a change to Volume 1 and/or Volume 2 (of the *Food Standards Code*) is published in the *Commonwealth Gazette* and the *New Zealand Gazette* and adopted by reference and without amendment under Australian State and Territory food law.

In New Zealand the New Zealand Minister for Health gazettes the food standard under the New Zealand Food Act. Following gazettal, the standard takes effect 28 days later.

Further Information

Submissions
No submissions on this matter are sought as the Authority has completed its assessment and the matter is now with the Australia and New Zealand Food Regulation Ministerial Council for consideration.

Further information on this and other matters should be addressed to the Standards Liaison Officer at the Food Standards Australia New Zealand at one of the following addresses:

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Assessment reports are available for viewing and downloading from the FSANZ website www.foodstandards.gov.au or alternatively paper copies of reports can be requested from the Authority's Information Officer at info@foodstandards.gov.au including other general enquiries and requests for information.

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EXECUTIVE SUMMARY

Food Standards Australia New Zealand (FSANZ) received an application on 28 May 2001 from Surebeam Australia Pty Ltd to amend Standard 1.5.3-Food Irradiation to permit the treatment of specified tropical fruits (breadfruit, carambola, custard apple, litchi, longan, mango, mangosteen, papaya and rambutan) with machine sourced electron beams or x-rays as a phytosanitary measure[1] within the dose range of 150 Gy (minimum) to 1 kGy (maximum). It is expected that approval of irradiation for the above tropical fruits would provide an alternative treatment to existing techniques (such as chemical treatments). It would also facilitate access to New Zealand markets for Australian tropical fruit growers.

Regulatory Problem

The sale of irradiated foods in Australia and New Zealand (Standard 1.5.3 –Food Irradiation) is prohibited unless the food is listed in the Table to clause 4 of the Standard. There is currently no permission to irradiate tropical fruits in Standard 1.5.3.

Objective

To determine whether the food standards should be changed to permit the sale of irradiated tropical fruits. Such an amendment would need to be consistent with the section 10 objectives of the *Food Standards Australia New Zealand Act 1991*.

Background

This is the second application to FSANZ to amend the *Food Standards Code* to permit the irradiation of food. FSANZ previously considered an application to irradiate herbs, spices, nuts, oilseeds and teas. Permission was granted by the former Australia New Zealand Food Standards Council (ANZFSC) to treat herbs, spices and herbal infusions only.

Seven countries, including the USA and UK, currently permit the use of irradiation as a disinfestation or quarantine measure for all fruits. However, it should be noted that disinfestation treatments may be also be carried out for non-quarantine purposes (for example to destroy non-quarantine pests that may affect the quality of the fruit) and would be classified as sanitary treatments.

Issues considered during assessment of the Application

A range of issues were considered during the assessment of the application; namely, safety, nutritional impact, technological need and the need for labelling of irradiated tropical fruits. Other issues such as the provision of information for consumers about irradiated food, packaging, approval of irradiation facilities, methods of detection, quality of irradiated food and the benefits to industry were also addressed.

[1] A Phytosanitary measure is any legislation, regulation or official procedure having the purpose to prevent the introduction and/or spread of quarantine pests.

It was considered that there is a technological need[2] to use either electron beams or x-rays to treat the specified tropical fruits for the purpose of pest disinfestation[3] for either the fruit fly or other critical pests that may be of quarantine significance.

The available studies on fruits indicate that there are no safety concerns and there are no new compounds formed following irradiation of tropical fruits that are likely to cause public health and safety concerns. The overall conclusion is that irradiation of tropical fruits up to a maximum of 1 kGy employing Good Manufacturing/Irradiation Practices is safe for Australian and New Zealand consumers.

The nutritional analysis and dietary intake assessment concluded that irradiation would have minimal impact on the nutrient status of the tropical fruits. The tropical fruits proposed to be irradiated are minor contributors to the total dietary intakes of β-carotene, folate, vitamin C and Vitamin B1 when considered in the context of the overall diet.

In accordance with Standard 1.5.3, irradiated tropical fruits will be required to be labelled or information otherwise provided in connection with the fruit, to give consumers an informed choice in the purchase of these fruits.

FSANZ has undertaken various communication activities to assist consumer, industry and government understanding about irradiation of tropical fruits in general and has detailed the results of recent consumer and industry perception surveys on irradiated foods.

Food to be processed by irradiation, and the packages and packing materials used must be of suitable quality appropriate for food irradiation, and there are various standards which cover this requirement.

Although the *Food Standard Code* does not address the approval of irradiation facilities, FSANZ notes that there are many irradiation facilities that are licensed and regulated by authorities in Australia and New Zealand, which will ensure that irradiation facilities are appropriately licensed to perform irradiation of tropical fruits.

There are methods of detection available for irradiated foods. However, these are still in the developmental stage and the specific method applicable to tropical fruits has not been verified internationally. Therefore, control of dose is managed by accurate dosimetry and maintenance of records under the requirements of Standard 1.5.3.

Although some reductions in textural quality of the fruit can occur with increasing doses of irradiation there are benefits for both industry and consumers in the approval of irradiation of tropical fruits. It is recognised that there still needs to be further public education and information programs about irradiated food.

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[2] Technological need, in relation to irradiation of food, refers to the minimum dose of ionising irradiation required to ensure the safety or quality of food, provided the process is performed in accordance with good manufacturing practice, and includes the extension of shelf life, the destruction of certain bacteriological contamination or pest disinfestation (Standard 1.5.3, Clause 1, Definitions).

[3] Pest disinfestation only pertains to a phytosanitary measure in this Application and does not include treatments carried out for non-quarantine purposes.

Options

FSANZ identified two options, namely:

1. Not to permit the irradiation of tropical fruits; or

2. Permit the irradiation of tropical fruits in accordance with Standard 1.5.3, that is, where there is a technological need or it is necessary for a food hygiene purpose.

Impact analysis

The impact analysis shows that **option 2** satisfies the objectives of the FSANZ Act based on the outcome of the scientific risk assessment and the Regulatory Impact Statement (RIS) taking into account all matters raised following the public consultation period. These matters included an assurance of the safety and wholesomeness of irradiated tropical fruits, the provision of adequate labelling so as to give consumers informed choices for purchases of irradiated tropical fruits, the provision of benefits to industry and governments in terms of enhanced market opportunities and trade (under Australia and New Zealand's requirements under the World Trade Organization) and in addition, the benefits to consumers in regard to possible greater seasonal availability of fruits.

Any permission in the *Food Standards Code* would permit irradiated foods to be lawfully sold on the Australian and New Zealand markets. It should be noted, however, that for imported foods, or foods subject to interstate trade within Australia, or trade between Australia and New Zealand, the relevant authorities in Australia and New Zealand must assess and approve irradiation as an acceptable phytosanitary measure for quarantine purposes on a case-by-case basis.

Consultation

There are many parties affected by the application and FSANZ has consulted widely on the advantages and disadvantages to specific stakeholders should permission be granted to irradiate the specific tropical fruits. Furthermore, FSANZ has evaluated the costs and benefits to consumers, the Government and industry.

Statement of Reasons

FSANZ approved a draft variation of a standard pursuant to Application A443 for the following reasons:

- there is no evidence of any public health and safety concern associated with consumption of irradiated tropical fruits and there are no significant nutritional losses of vitamins and minerals in the context of total dietary intakes from irradiated fruits at a dose of up to 1 kGy;

- a specific technological need (pest disinfestation) as required by Standard 1.5.3 has been shown to exist and a minimum dose of 150 Gy and a maximum dose of 1 kGy is considered to be an appropriate dose range to control the range of pests of likely concern. This has been confirmed by quarantine officials in Australia and New Zealand;

- mandatory labelling statements will be required to ensure that consumers are informed that the food has been irradiated;

- the proposed changes to Volume 2 of the *Food Standards Code* are consistent with the section 10 objectives of the *Food Standards Australia New Zealand Act 1991*. In particular, public health and safety, adequate information being available to consumers to make informed choices and prevention of misleading and deceptive conduct have all been considered in detail; and

- as part of the analysis of the costs and benefits required for the Regulatory Impact Statement, it was determined that, for the preferred option, namely, to approve the use of irradiation on tropical fruits, the benefits of the proposed amendment outweigh the costs.

1. INTRODUCTION

An Application was received on 28 May 2002 from Surebeam Australia Pty Ltd to amend Standard 1.5.3-Food Irradiation to permit the treatment of specified tropical fruits with machine sourced electron beams or x-rays as a phytosanitary measure. A phytosanitary measure specifically refers to 'pest disinfestation' under the definition of a technological need in Standard 1.5.3.

The aim is to have available an effective technique that will prevent the introduction and/or spread of quarantine pests in selected tropical fruits. The Applicant argued, in part, that such permissions would facilitate trade and market access (particularly in New Zealand).

FSANZ, in assessing this Application, has considered the matter in the context of Standard 1.5.3 and its statutory objectives.

FSANZ notes that the *Food Standards Code* applies to food that is sold in Australia and New Zealand. This application (A443) has implications for the movement of food between the two countries, though it does not obviate the need for other requirements, such as quarantine requirements, to be met.

1.2 Transitional Requirements

This application reached full (draft) assessment stage under the operation of the *Australia New Zealand Food Authority Act 1991* (ANZFA Act), and will be finalised in accordance with the provisions of the *Food Standards Australia New Zealand Act 1991* (FSANZ Act).

FSANZ has therefore been required to:

1. give the applicant the opportunity to (by 29 July 2002) request deferral of consideration of the application in order to provide any additional information;

2. give notice under section 13A or 14 of the FSANZ Act; and

3. review the full (draft) assessment having regard to any new submissions received in response to the above notice as well as any written policy guidelines that have been notified by the Ministerial Council.

No relevant policy guidelines or submissions have been received.

2. REGULATORY PROBLEM

Standard 1.5.3 prohibits the irradiation of foods in Australia and New Zealand unless the food is listed in the Table to clause 4 in the Standard. Irradiated foods are required to undergo a pre-market assessment before they can be sold in Australia or New Zealand. A specific technological need must also exist to irradiate food. Tropical fruits are currently not listed in the Table to Clause 4 of Standard 1.5.3.

3. OBJECTIVES

To determine whether the *Food Standards Code* should be changed to permit the sale of specified irradiated tropical fruits. Such an amendment would need to be consistent with the section 10 objectives of the FSANZ Act.

The objectives of the FSANZ Act (section 10 objectives of FSANZ) are:

- the protection of public health and safety;
- the provision of adequate information relating to food to enable consumers to make informed choices; and
- the prevention of misleading or deceptive conduct.

In developing and varying such measures, FSANZ must also have regard to:

- the need for standards to be based on risk analysis using the best available scientific evidence;
- the promotion of consistency between domestic and international food standards;
- the desirability of an efficient and internationally competitive food industry; and
- the promotion of fair trading in food.

The specific objectives for this application are:

- to determine whether irradiating the specified tropical fruits is safe for consumers and whether there is significantly diminished nutritional value following irradiation; and

- to determine whether a technological need exists to irradiate tropical fruits and whether the technique is efficacious in meeting that technological need (in this case pest disinfestation).

4. BACKGROUND

4.1 Standard A17/1.5.3-Irradiation of Food

Standard A17 - Irradiation of Food in Volume 1 of the *Food Standards Code* came into effect on 2 September 1999. It was replicated in Volume 2 of the *Food Standards Code* as Standard 1.5.3, which came into effect of 20 December 2000.

The key provisions of Standard 1.5.3 are:

- prohibition on the irradiation of food, or ingredients or components of food, unless a specific permission is given. This consideration is on a case-by-case basis;

- irradiation of food is only permitted where it fulfils a technological need or is necessary for a purpose associated with food hygiene;

- irradiation of food is not a substitute procedure for good manufacturing practices; and

- specification of the permitted sources of ionising radiation, listing of minimum and maximum doses, requirements for the keeping of certain records in relation to the irradiation of food, and requirements for the labelling of food which has been irradiated.

4.2 Currently available treatments for tropical fruits

The Applicant has stated in the application that a range of treatments are currently available for use on tropical fruits:

- *Post harvest chemicals*-such as dimethoate, fenthion and methyl bromide. However, these treatments either do not meet New Zealand Quarantine requirements or are under review for public health and safety reasons (eg occupational health or environmental concerns);

- *Heat Treatments*-hot air or hot water at specified temperature and time is currently approved for mango and papaya for some Australian interstate trade. However, heat treatments do not meet New Zealand Quarantine requirements and product losses and costs are high under Australian conditions;

- *Cold treatment*-is not an economical measure because of product damage and high costs under Australian conditions;

- *Maturity standards* - i.e. relatively less mature or unripe fruit are less attractive or a 'non host' to critical quarantine pests, which is considered an option for papaya. However, the fruit is less mature and ripe, flavour is not well developed and the treatment does not meet New Zealand Quarantine requirements; and

- *Unbroken skin*-for fruits such as litchi, longan, rambutan and mangosteen. This does not meet New Zealand Quarantine requirements

4.3 Amendments to the Application

During the periods 26 June to 23 August 2001 and from 21 December 2001 to 11 February 2002 further information was sought from the Applicant on:

- an appropriate minimum dose to achieve the technological purpose of pest disinfestations and the efficacy of the irradiation treatment for this technological purpose at a maximum dose of 1 kGy;

- toxicological studies on irradiated foods (specifically fruits) and dietary exposure and nutritional data; and

- the range of countries that currently irradiate tropical fruits for the purpose of pest disinfestations.

The Applicant advised FSANZ on 7 February 2002 that they wished to amend the application to delete the reference to 'As specified by a relevant plant quarantine authority as a phytosanitary measure' in the original application and throughout the text of the application; and, consequently insert a minimum dose of 150 Gy.

The revised Application is as follows:

Column 1 Food	Column 2 Minimum and Maximum Dose (kGy)	Column 3 Conditions
Fruits Breadfruit Carambola Custard Apple Longan Litchi Mango Mangosteen Papaya Rambutan.	Minimum dose: 150 Gy Maximum dose: 1 kGy	Fruit to be treated should be of good overall quality and reflect the results of Good Agricultural Practice (GAP) Recommended handling and storage procedures should be used prior to and after treatment

4.4 International and national regulations for irradiation of tropical fruits

4.4.1 Codex

The 1983 Codex standard for irradiated foods sets a maximum overall dose of 10 kGy.

No specific foods are mentioned, although the standard states:

> *The irradiation of food is justified only where it fulfils a technological need or where it serves a food hygiene purpose and should not be used as a substitute for good manufacturing practices.*

This Standard is currently undergoing a review with a view to removing the maximum level of 10 kGy. This was last considered at the 34th meeting of the Codex Committee on Food Additives and Contaminants (CCFAC), March 2002. The decision was deferred for further consideration at the next meeting of CCFAC in 2003.

4.4.2 National Regulations

Seven countries, including the USA and UK, currently permit the use of irradiation as a disinfestation or quarantine measure for all fruits. However, it should be noted that disinfestation treatments may also be carried out for non-quarantine purposes (for example to destroy non-quarantine pests that may affect the quality of the fruit) and would be classified as sanitary treatments (**Attachment 6**).

The United States Department of Agriculture (USDA) currently approves the use of irradiation on the following tropical fruits from Hawaii to the US mainland at a minimum dose of 0.25 kGy[4] for control of pests (Melon fly, Mediterranean fruit fly, Oriental fruit fly, Malaysian fruit fly) in:

[4] The US Food and Drug Administration maximum dose for tropical fruits is 1 kGy based on food safety considerations.

Abui
Custard Apple
Carambola
Longan
Litchi
Papaya
Rambutan
Sapodilla

Approvals are anticipated from the USDA to permit the treatment of breadfruit, jackfruit, mango and mangosteen. In May 2000, the USDA proposed a rule on irradiation that will establish a treatment of between 0.15-0.250 kGy for 11 species of fruit fly and a treatment of 0.1 kGy for mango seed weevil regardless of host.

A Supplement to that rule was issued by the USDA on 15 March 2002 proposing additional requirements; namely, the use of radiation indicators and additional inspection and monitoring of irradiation facilities. A final ruling was made on 23 October 2002[5].

In the USA, the Food and Drug Administration (USFDA) do not prohibit irradiation as a treatment and have similar rules to Australia and New Zealand in that irradiated food must be labelled and that irradiation is not a substitute for Good Manufacturing Practice (GMP) and good hygienic practices.

4.5 Previous irradiation Application (A413)

FSANZ received an application on 3 May 2000 to amend Volume 1 and Volume 2 of the *Food Standards Code* to permit the irradiation of herbs, spices, nuts, oilseeds and teas. The Application sought to achieve certain technological and food safety requirements including (as described in the application) microbial decontamination, pest disinfestations and the prevention of sprouting and germination of weed seeds inadvertently present in the foods.

The Applicant sought approval for the use of the technology on the specified products for both quarantine and non-quarantine (including food safety) treatments.

The Application was finalised by FSANZ in July 2001 and a recommendation was made to the Ministerial Council in September 2001. The Council approved (19 September 2001) the use of irradiation on herbs, spices and herbal infusions for both quarantine and non-quarantine purposes.

5. ISSUES RELEVANT TO THIS APPLICATION

5.1 Overall Scientific Assessment

A detailed report on the technical, safety and nutritional aspects of irradiation of tropical fruits is present in **Attachment 2**.

The overall conclusions of this report are as follows:

[5] The minimum dose for treatment of mango seed weevil was increased from 0.1 to 0.3kGy

- there is an established technological need to irradiate tropical fruits for the purposes of pest disinfestation;

- international scientific opinion is that irradiated food is safe when the irradiation is performed at dose levels necessary to achieve the intended technological function and, in accordance with good radiation/manufacturing practice;

- there are chemical changes in tropical fruits following irradiation (albeit limited) resulting in the formation of radiolytic products. However, these products are not always unique to irradiation and are also present following more traditional processing of food, namely, heat;

- as with other form of food processing, irradiation will have some impacts on the nutrient status of tropical fruits; however, there are few indications that these impacts are any greater than other forms of food processing, especially for irradiation doses less than 10 kGy;

- the research indicates that carbohydrates, proteins, fatty acids, minerals and trace elements in tropical fruits undergo very minimal alteration during irradiation; although selected vitamins are affected following irradiation of tropical fruits. However, the dietary exposure analysis showed that any potential reductions in specific vitamins are unlikely to have significant impact on dietary intakes of these vitamins by the Australian or New Zealand populations;

- overall, there are no toxicological concerns resulting from the formation of new radiolytic products following irradiation of tropical fruits. By virtue of the concept of chemiclearance and the past safety studies performed on fruits (including tropical fruits) irradiated food is considered equivalent to non-irradiated food or fruits that have been treated with more conventional treatment protocols (eg heating for quarantine purposes) with respect to safety, nutritional properties and wholesomeness.

5.2 Safety assessment of irradiated tropical fruits

The safety of irradiated tropical fruits has been evaluated in animals and humans and the following was concluded (**Attachment 2**):

- When food is irradiated, several new compounds (radiolytic products) are formed but their total concentration is very low.

- Virtually all the radiolytic products, except possibly for 2-Alkylcyclobutanones (2-ACBs), that have previously been found in irradiated foods are either naturally present in food or produced in thermally processed foods.

- The available data does not suggest that 2-ACBs are of toxicological concern to consumers following consumption of irradiated tropical fruits.

- Based on the concept of chemiclearance[6], the previous studies on fruit (including tropical fruits) indicate there is no evidence that irradiated fruit in the diet leads to safety concerns.

- The past safety studies performed on irradiated fruits indicates that the treatment does not raise any safety concerns beyond those raised by conventional treatment of fruits.

5.2.1 Public submissions

Public submissions raised a number of issues with respect to the safety of irradiated foods in general, and specifically following irradiation of tropical fruits (**Attachment 4**). These have been addressed in detail by FSANZ (**refer to Attachment 2**). More specific questions are addressed below and in **Attachment 5**.

Some of the public submissions suggested that FSANZ's assessment only contains scientific reports, which favour irradiation and any studies that have shown adverse effects were not listed in **Attachment 2**.

Furthermore, on 8 October 2002, Public Citizen published a report titled *Bad Taste: The Disturbing Truth About the World health Organization's Endorsement of Food Irradiation*.

Public Citizen suggested the following in relation to the safety of irradiated foods:

- the World Health Organization (WHO) played a role in misrepresenting research that revealed health problems in animals that were fed irradiated foods; and

- WHO dismissed recent evidence demonstrating toxic and carcinogenic properties of cyclobutanones (2-ACBs).

5.2.2 Evaluation of public submissions

FSANZ has noted that previous Expert Committees had examined the issue of the safety of irradiated foods on numerous occasions. In particular, the past Committees from the period 1964 to 1981 examined any new evidence that was available on the safety of irradiated foods as reflected in the conclusions and subsequent recommendations from these reports. This culminated in the 1981 Report on the Wholesomeness of Irradiated Food by the Joint FAO/IAEA/WHO Expert Committee concluding that irradiation of any commodity up to an overall average dose of 10 kGy presented no toxicological hazard.

Toxicological studies have been carried out on a large number of individual foods and although there were studies that purported to show adverse effects, they were not considered scientifically sound for various reasons (such as lack of repeatability, design flaws etc). WHO experts subsequently dismissed these studies.

WHO also convened with the FAO and the IAEA two other consultations in 1992 and 1997 that reconfirmed earlier conclusions (1981) on the safety and nutritional adequacy of irradiated foods.

[6] The concept of chemiclearance is explained fully in Attachments 2 and 5

Therefore, FSANZ does not agree that the WHO would have misrepresented research on the safety of irradiated foods. Furthermore, other regulatory agencies in the United Kingdom, European Union and the USA and independent organizations also evaluated the safety of irradiated foods and agreed that the research data supported the safety of irradiated foods.

Furthermore, the WHO has never dismissed recent new evidence on cyclobutanones, rather, they called for further research to be conducted and published in peer-reviewed journals. The WHO has publicly maintained that it will take immediate action to inform the Codex Committee on Food Additives and Contaminants of any possible hazard to human health from irradiated foods and that the WHO is committed to a full and complete assessment of cyclobutanones if there is any question of a potential hazard to public health.

A recent statement from the European Commission's Scientific Committee on Food on cyclobutanones (3 July 2002) stated the following:

> *In summary, as the adverse effects noted refer almost entirely to in vitro studies, it is not appropriate, on the basis of these results, to make a risk assessment for human health associated with the consumption of cyclobutanones present in irradiated fat-containing foods.*

The WHO is presently working on a position statement on cyclobutanones.

Conclusion-FSANZ was aware that there were previous contrary findings that are not specifically cited in the FSANZ safety assessment as previous expert committees had considered all of the available data. FSANZ concurs with the conclusions of the WHO (1994) and more recently the WHO's (1999) evaluation of the safety of irradiated foods (Attachment 2).

The available studies on fruits indicates that there are no toxicological concerns and there are no compounds formed following irradiation that are likely to cause public health and safety concerns. Irradiation of tropical fruits up to a maximum of 1 kGy employing Good Manufacturing/Irradiation Practices does not pose additional risks for Australian and New Zealand consumers.

5.3 Nutritional impact of irradiation

A detailed report of the nutritional impact of irradiation of tropical fruits is provided in Attachment 2.

Public submissions were concerned that irradiation may diminish the nutritional value and wholesomeness of the tropical fruits.

5.3.1 Evaluation

The nutritional analysis suggested that irradiation potentially causes both macro and micronutrient changes in foods, depending on the irradiation dose, the food's composition and environmental conditions. Therefore, as a form of food processing, irradiation will have some impact on the nutritional composition of foods.

However, the available data indicate that carbohydrates, proteins, fatty acids, minerals and trace elements in tropical fruits undergo minimal alteration during irradiation, particularly at the low maximum dose of 1 kGy proposed to be used on tropical fruits.

The nutritional assessment (Attachments 2 and 3) indicates that the selected tropical fruits proposed for irradiation are minor contributors to the total dietary intakes of β-carotene, folate, vitamin C and vitamin B_1 when considered within the context of total dietary intake.

Therefore potential reduction, of β-carotene, folate, vitamin C and vitamin B_1 due to irradiation is unlikely to have a significant impact on dietary intakes of these vitamins by the Australian or New Zealand populations, even when considered on a regional basis.

5.4 Technological Need and efficacy of the Irradiation Process

A detailed report of the technical aspects of irradiation of tropical fruits is provided in Attachment 2.

Additionally, public submissions raised the following issues:

- Is there a specific technological need to irradiate tropical fruits?

- Previously, there was research regarding the breeding of insect resistant tropical fruits. FSANZ should follow this up with CSIRO.

- Why if the papaya fruit fly in Queensland has been totally eradicated is there a technological need in this application to irradiate papayas?

- Extended season claims were accepted without full appraisal

- The Application cannot be considered by FSANZ until the Ministry of Agriculture and Forestry, New Zealand (MAFNZ) has approved the irradiation of tropical fruit as a biosecurity treatment. If MAFNZ approval is not granted then there is no technological need and any approval given by FSANZ will be in breach of its own standard.

5.4.1 Evaluation of public submissions

Approval for the use of irradiation as an alternative treatment for the purpose of quarantine pest disinfestation in the *Food Standards Code* does not automatically mean that approval will be granted for this purpose under the quarantine provisions of Australia and/or New Zealand as regards international trade and interstate trade within Australia; rather, it is a two-step approval process.

Firstly, the use of food irradiation on the proposed tropical fruits must be approved by the Board of FSANZ based on food safety, nutritional adequacy, a recognised technological need and other considerations under the FSANZ Act. The Australia and New Zealand Food Regulation Ministerial Council (ANZFRMC) is then notified of this approval, and may request it be reviewed; or it may ultimately reject or amend the approved variations to Standards. An amendment of the *Food Standards Code* via this process is necessary to allow lawful sale of irradiated food on the market in Australia and New Zealand.

Secondly, the relevant Australian and New Zealand quarantine agencies must then undertake bilateral negotiations to determine, on a case-by-case basis, an appropriate irradiation treatment for the specific pests of quarantine concern that meets relevant quarantine import requirements (the dose rate for such a treatment would need to be within the minimum and maximum range specified in the draft standard) for individual tropical fruits.

5.4.2 Consultation with relevant quarantine agencies

FSANZ received advice from the Applicant indicating that Biosecurity Australia (BA), the Ministry of Agriculture and Forestry, New Zealand (MAFNZ) and the Australian Interstate Plant Health Regulation Working Group (IPHRWG) were considering the issue of irradiation treatment for the specified pest/tropical fruit commodities identified in the application. In particular, that the maximum dose of 1 kGy will be an appropriate and efficacious dose for the technological need of treatment of quarantine pests. These responses have been taken into account in this assessment process. In addition, the relevant quarantine authorities were consulted directly when assessing the merits of the application.

FSANZ recognises that the relevant quarantine agencies need to make a specific assessment of imported tropical fruits to determine that they comply with any quarantine requirements.

5.4.3 Technological need

Advice received by FSANZ from quarantine authorities is that irradiation of tropical fruits for the purpose of pest disinfestation could provide an alternative to currently used disinfestation methods. The proposed minimum dose of 150 Gy and maximum dose of 1 kGy will provide a dose range in order for quarantine agencies to consider irradiation as a treatment for pest disinfestation of the selected tropical fruits. Quarantine authorities with the responsibility for considering irradiation as a phytosanitary treatment are BA and MAFNZ (in relation to international trade) and the IPHRWG (in relation to interstate trade within Australia).

It is BA's preferred option to have no listing of a minimum dose in the *Food Standards Code* as this dose should be determined by relevant quarantine agencies. However, there is a specific legal requirement in Standard 1.5.3 that a minimum and maximum dose be included in the standard.

Under the separate regulatory requirements of the Australian and New Zealand Quarantine legislation, if a lower minimum dose was needed for disinfestation of a particular pest, then these Acts would enable those requirements to be fulfilled before a particular fruit could be imported into Australia or New Zealand or traded on an interstate basis within Australia. However, FSANZ would need to be advised by these bodies that a lower minimum quarantine dose was required. FSANZ would then consider amendment of the *Food Standards Code* to reflect the revised minimum dose to make the food lawful for sale in the Australian and New Zealand markets.

5.4.4 Insect resistant fruit and the Papaya fruit fly

FSANZ approached the Queensland Department of Primary Industry (QDPI) and the Commonwealth Scientific Industrial and Research Organisation (CSIRO) on the issue of insect resistant tropical fruits and whether a technological need now exists to irradiate papayas if papaya fruit fly had been eradicated.

Advice from QDPI and CSIRO with respect to insect resistant tropical fruits was that there is no active research program being pursued on breeding insect resistant tropical fruits. BA also advised FSANZ that it is most improbable that a level of resistance to fruit flies could be bred into host fruit that would be considered sufficient for quarantine purposes. Such 'breeding for resistance' cannot be considered equivalent to the quarantine security provided by current disinfestation treatments.

With respect to technological need to irradiate papayas, the QDPI declared on 30 April 1999 that the Papaya fruit fly, an introduced species, had been eradicated.

However, the overall intent of this application is to use irradiation for the disinfestations of many different fruit fly pests and other critical quarantine pests. Other species of fruit fly exist, and thus there is still a technological need to treat these other species and in addition other pests (such as mango seed weevil and macadamia nut borer in litchi) with an appropriate quarantine treatment such as irradiation.

Other individual and more specific questions raised in public submissions on the technological need for irradiation of the specified tropical fruits have been addressed in the Question and Answer section (**Attachment 5**).

5.4.5 Overall conclusion on technological need

Disinfestation of the specified tropical fruits by irradiation is a valid treatment for quarantine purposes and meets the requirements of a technological need (pest disinfestation) under Standard 1.5.3. Insect pests of quarantine significance to importing countries represent a major barrier in gaining access to some markets. E-beam and X-ray irradiation techniques are considered efficacious treatments for tropical fruits. These techniques have the capacity to attain an equivalent level of efficacy when compared to current alternatives (chemicals, heat, cold treatments and manipulating maturity standards).

FSANZ sought specific advice from the relevant quarantine agencies that irradiation is an effective and efficacious technique for the disinfestation of critical quarantine pests.

The possibility of harvesting fruit at a more mature stage was a claim made by the Applicant and did not need a specific assessment by FSANZ. This is solely a market issue for industry.

The *Food Standards Code* applies to food that is produced and sold on the Australian and New Zealand markets. The Code therefore applies to food that is domestically produced in Australia and New Zealand and also food imported into both countries subject to the fulfilment of relevant quarantine requirements. In particular, MAFNZ approval would be required for the export of tropical fruits from Australia to New Zealand. However, the NZ market is only one potential market that would be available to Australian Tropical Fruit growers.

Overall Conclusion-By virtue of the endorsement and expert advice provided by the relevant quarantine authorities (BA, IPHRWG and MAFNZ), FSANZ concluded that a specific technological need exists to irradiate the proposed tropical fruits.

5.5 Labelling of irradiated tropical fruits

Public submissions raised the following issues:

- FSANZ does not specify the labelling required for irradiated uncooked fruits and vegetables.
- Concerns that fruits will not be adequately labelled for consumers.
- Use of the term 'electronic pasteurisation' rather than irradiation is misleading to consumers.
- The International Radura symbol should have been recommended and FSANZ is departing from international practices.
- Irradiated tropical fruit must have mandatory labelling and separate in-store shelving.
- A specific provision must be to ensure point of sale labelling is legible

5.5.1 Evaluation

Standard 1.5.3 - Irradiation of Food, requires that a package of food for retail sale or for catering purposes that has been irradiated must be labelled with a statement that the food has been treated with ionising radiation. The Standard provides three examples of such statements. These are 'Treated with ionising radiation', 'Treated with ionising electrons' and 'Irradiated (name of food)'. The use of the international radura symbol is optional. However, the use of the symbol would be in addition to the statement that the food has been treated with ionising radiation. The standard also contains requirements for labelling in relation to irradiated ingredients, and in relation to food not otherwise required to bear a label.

Standard 1.5.3 contains specific requirements for the labelling of those irradiated foods used as ingredients in composite or mixed foods, such as packaged pizza or pasta sauce. In this case, the declaration of the presence of irradiated ingredients may be in association with the name of the ingredient in the ingredient list, or a declaration elsewhere on the label.

Standard 1.5.3 requires that irradiated food or food containing irradiated ingredients or components that are exempt in Standard 1.2.2 - Application of Labelling and Other Information Requirements from bearing a label and which is displayed for sale must have a written statement that the food, or an ingredient of a food or a component of the food has been treated with ionizing radiation. This would mean that irradiated food sold unpackaged and displayed for sale, including ready to eat foods, would need to be accompanied by a written statement advising consumers of the treatment of food with ionizing radiation.

A package of food sold other than at retail must also include:

(a) a statement that the food has been irradiated; and

(b) the minimum and maximum dose of the irradiation; and
(c) the identity of the facility where the food was irradiated; and
(d) the date or dates of irradiation.

A description of the purpose of food irradiation would also be permitted to be placed on the label provided that is was not false, misleading or deceptive.

FSANZ agrees that the term 'electronic pasteurisation' may be misleading and should not be used to indicate that a food or an ingredient of a food had been irradiated. Clause 6(1) of Standard 1.5.3 requires that the food be labelled with a statement that the food has been treated with ionising radiation. The term 'irradiated' is permitted.

The use of the International Radura symbol is optional on irradiated foods which is consistent with the current International Codex Standard for Irradiated foods (5.2.1):

> *5.2.1 The label of a food which has been treated with ionising radiation shall carry a written statement indicating that treatment in close proximity to the name of the food. The use of the international food irradiation symbol, as shown, is optional, but where it is used, it shall be in close proximity to the name of the food.*

FSANZ sees no reason to insist on separate in-store shelving, although this would not stop retailers from choosing this option should they desire too.

Any information required in or on a food label needs to comply with the legibility requirements in Standard 1.2.9 in Volume 2 of the *Food Standards Code*. Standard 1.2.9 requires that all food labels present information so that it is:

- legible, and
- prominent (such as to afford a distinct contrast to the background) and
- in English.

5.6 Packaging in relation to irradiated fruit

Food to be processed by irradiation, and the packages and packing materials used or intended for use in connection with food so processed, must be of suitable quality and in an acceptable hygienic condition, appropriate for the purpose of such processing. These should also be handled before and after irradiation, according to good manufacturing practice, taking into account, in each case, the particular requirements of the technology of the process. It is the responsibility of Australian and New Zealand food manufacturers and retailers to ensure that their products are safe and that they comply with all relevant legislation.

Various types of packaging materials have been approved overseas for use when food is irradiated. Their suitability for irradiation has been studied in Canada, the United Kingdom and the USA.

The USDA have mandated in their proposed rule change *Irradiation Phytosanitary Treatment of Imported Fruits and Vegetables* 7 CFR 305 & 319 that *the cartons may be constructed of any material that prevents the entry of fruit flies and prevents oviposition by fruit flies into the articles in the carton*. The US FDA has a regulation '179.45 - Packaging materials for use during the irradiation of pre-packaged foods'.

Current commercial practice in the US, including both Hawaii and Florida, is the use of standard commercial produce industry packaging materials including corrugated Kraft paper boxes.

Standard 1.4.3 of the *Food Standards Code* provides for permission for articles and materials to be in contact with food in accordance with the conditions set out in the Standard. In the editorial note, Standard 1.4.3 refers to Australian Standards AS2070-1999, which details standards for plastic materials for food contact use. AS2070 refers to the USA Code of Federal Regulations and the EU Directives on plastics suitable for use on irradiated foods.

There is also an extensive body of work in relation to the packaging materials for use with irradiated foods and an American Society of Testing Methods (ASTM) Standard Guide for Packaging Materials for Foods to be Irradiated (1995): *Standard Guide for Packaging Materials for Food to be Irradiated* - ASTM 1640.

Advice received by FSANZ indicated that the tropical fruits listed in this application are not in 'intimate' contact with the packaging, most of the fruits have an inedible skin and an irregular shape with very little of the surface of the product in contact with the packaging. Therefore, the product contact area with the irradiation beam is the skin (apart from carambola skin), which is discarded prior to consumption.

At a low maximum dose of 1 kGy it would not be expected that packaging material in contact with the tropical fruits would undergo significant alteration of its functional properties or yield materials which could transfer to the food as a result of irradiation at phytosanitary doses (International Consultative Group on Food Irradiation (ICGFI) Document 7 - *Code of Good Irradiation Practice for Insect Disinfestation of Fresh Fruits*).

5.7 Irradiation Facilities

Public submissions raised the following issues:

- The location of the proposed Surebeam facility was not detailed for public information. Requested FSANZ to publish this location on its website.

- What regulatory agencies license irradiation facilities and what measures are in place to protect the occupational health and safety of irradiation workers and the general public?

5.7.1 Evaluation of public submissions

These matters are not addressed by the *Food Standards Code*, but are the subject of regulatory and planning decisions of the relevant State/Territory authorities.

Irradiation facilities are licensed and regulated by the following authorities in Australia and New Zealand:

National level	State or Territory level	Local government level
Australia:		
Australian Radiation Protection and Nuclear Safety Agency (regulates Commonwealth radiation facilities)	Departments of Health or Environment Protection Authority in all Australian States and Territories for licensing and regulation of radiation use, planning, occupational health and safety and food laws	Local government authorities for local planning approvals, enforcement of food laws and standards and registration of food businesses
Department of Environment (environmental considerations depending on the size of the plant).		
Australian Quarantine and Inspection Service (approved quarantine treatment of imports, monitoring under the Imported Food Inspection Program and approval for exports).		
Therapeutic Goods Administration (approval for therapeutic goods).		
Food Standards Australia New Zealand (treatment of food).		
Australian Customs Service (approval for import of radioactive substances).		
New Zealand:		
Ministry of Health through the National Radiation Laboratory (regulates radiation facilities and import/export of radioactive substances)		Local government (planning approvals under the Resource Management Act)
Ministry of Health and Public Health Units (enforces food law, including food standards)		
Ministry of Agriculture and Forestry (Biosecurity), (approval of quarantine treatments)		
Ministry for the Environment (can issue national policy statements, provides guidance to local government)		

The other issues raised (eg occupational health and safety for irradiation workers, and licensing of irradiation facilities) are matters for consideration by the relevant regulatory authorities such as:

- Environment Australia (under the Commonwealth's Environment Protection and Biodiversity Conservation Act) and;

- the Queensland Department of Communication, Local Government Planning and Sport (under the Integrated Planning Act).

Queensland Health also considers applications for permission to possess a radioactive substance under the Queensland Radiation Safety Act.

In Australia, the requirements for the design, administration, operation and safety of irradiation facilities that use X-rays, electrons or gamma radiation for non-medical purposes are established in the National Health and Medical Research Council Code of Practice for the Design and Safe Operation of Non-Medical Irradiation Facilities (Radiation Health Services No. 24, AGPS, Canberra). This Code is applicable to Australian facilities that irradiate foods.

5.8 Information for consumers about food irradiation

Public submissions raised the following issues:

- FSANZ has been inadequate in informing consumers about food irradiation

5.8.1 Evaluation of public submissions

FSANZ has undertaken communication activities to assist consumer, industry and government to access information about any approval, the process of assessing the application, the outcomes of the scientific assessment of the application and other factual information about food irradiation relevant to the application.

5.9 Consumer and industry perception surveys

Public submissions raised the following issues:

- There has been no market research to determine the negative impact on Australian farmers, nor any public information programme.

5.9.1 Evaluation of public submissions

The International Consultative Group on Food Irradiation (ICGFI) prepared a publication on food irradiation, titled:

- Consumer Attitudes and Market Response to Irradiated Food (ICGFI, 1999).

The publication suggested that worldwide consumer awareness of food irradiation is increasing. The paper reviewed consumer attitudes and marketing of irradiated foods in the period 1984-1997 and concluded the following:

- people in several countries have purchased irradiated food;
- in some markets, the availability of a high quality produce item out of season was an important benefit;
- greater microbiological safety was a benefit in other markets; and
- consumers will buy irradiated foods.

The Applicant provided FSANZ with a copy of a document titled *Perceptions of food irradiation in New Zealand and Australi*a by Roger Harker et al, HortResearch (2001).

In this report consumer opinions were explored before and after the viewing of a video on irradiated foods using a focus group approach in which a moderator directed the flow of the discussion and in a series of questionnaires. Industry opinion was solicited in a series of interviews with Australian and New Zealand companies. The Executive Summary is at Attachment 8.

Conclusions from the Report were as follows:

Consumers

- Australian and New Zealand consumers have some concerns about irradiated foods, although the level of concern is lower than other food safety issues (eg chemicals in food).

- The willingness to purchase irradiated foods is much lower than in the USA (20-25% for strawberries, 50-55% for sterilised foods for immuno-compromised patients); although, there was a greater willingness to purchase non-food items (eg medical or household goods).

- Consumers raised similar fears over irradiated foods as found in other countries; namely, exposure to radiation, reduction in nutrition and wholesomeness of foods, damage to the environment, occupational health for workers and the use of irradiation as a substitute for safe food production. Some consumers did not want increased shelf life of food.

- New Zealand consumers were concerned with retention of the 'clean, green image' of NZ food exports.

- Consumers seemed supportive of irradiated foods once a need for treatment has been established. For example, consumers were very supportive of using irradiation to sterilise foods for immuno-compromised patients compared to use on general commodity foods such as meat and strawberries.

Industry

- Some Australasian food exporters anticipate that many clients will require products to be irradiated to fulfil phytosanitary and/or food safety regulations, but fear a consumer 'backlash' against the technology by anti-irradiation activists within their own country will stall future developments.

- In any marketing strategy that industry employs it will be necessary to alert consumers to the high levels of microbiological risk associated with some food products which although food irradiation may enhance food safety it may be a 'double edged sword' in that it will emphasise the current microbiological risks in the food supply.

The final paragraph of the conclusions summarises the current situation in Australia and New Zealand:

Consumer awareness of irradiated food needs to be enhanced, and there probably needs to be a more public debate in order to develop a consensus. In this study it was clear that in the absence of a basic understanding of the issues, consumer support for irradiation fluctuates wildly depending on the bias of individuals. This lack of knowledge may expose Australasian industries to the risk that public opinion may be easily swayed towards rejecting irradiation of foods on the basis of irrational arguments. Providing consumers with even the simplistic information that was presented in the video resulted in consumers reaching a consensus that irradiation was only of minor concern. They reached this conclusion even though they expressed negative concerns about the bias of the video. It seems that New Zealanders and Australians may expect to hear both the pro-irradiation and anti-irradiation points of view before they are willing to make their own decision.

In addition, FSANZ has commissioned Donovan Research (Marketing and Communications Research Consultants) to undertake qualitative consumer research on food safety issues one of which was irradiated foods. The results of this research are now available on FSANZ's website (www.FSANZ.gov.au) and are summarised below:

Irradiated Foods

There was even less awareness and more misunderstanding about irradiated foods. The word 'irradiation' is almost synonymous with 'radiation' [also connoting 'nuclear'] and is consequently suspected to be unsafe or bad for you.

Much would need to be done by FSANZ to educate people about exactly what irradiation means, how irradiated foods compare safety-wise and nutritionally to similar products preserved in other ways, and what the potential benefits are before it would be acceptable to consumers at large.

5.9.2 Public education programs

It is evident from these studies that a significant information gap exists in relation to consumers knowledge about food irradiation. However, there is an imperative for other agencies and bodies to also play a role in providing relevant information to consumers in relation to this technology. FSANZ can play a role in terms of providing factual information in relation to the application, the process for assessing it, issues in relation to the application including fact sheets on the assessment process to facilitate transparency of the process.

However, other bodies have roles to play and should be strongly encouraged to do so. For example, industry can have a role to play, facilitated by the labelling requirement in the Standard, to specify the purpose of the irradiation process, for example, 'disinfestation to control critical quarantine pests'. Other relevant authorities, such as departments of agriculture also have a role to play in providing information on the biosecurity aspects of the technology and the benefits to both the economy as a whole and industry in general.

5.10 Nutritional significance of tropical fruits

Public submissions raised the following issues:

- The data of **Attachment 3** (Dietary Exposure Report) is of high quality and extensive. It should be used further to assess more fully the potential impact on Pacific Island communities in New Zealand.

- The nutritional assessment is based on the National Nutrition Survey of 1995, whereas consumption of many tropical fruits is seasonal. As such, the dietary importance of these tropical fruits can be much higher than estimated in the assessment, particularly when, mangoes are in season.

5.10.1 Evaluation of public submissions

There is likely to be sub-groups of the New Zealand population (e.g. those of Pacific Islander descent) whose intake of tropical fruit, due to its cultural significance, will be greater than that of the general population. However, an increase in the availability of tropical fruit may be expected to produce an even greater increase in its consumption amongst these population groups. It is not expected, however, that such a change in consumption patterns – including the consumption of irradiated tropical fruits – would have any adverse nutritional effects.

In respect to the other submission, individual records for the Australian 1995 National Nutrition Survey were collected every day over the period of thirteen months. As such, any seasonal variation that occurred in the intake of tropical fruits over this time has been reflected as an average in the survey results. The Nutrition Report does not distinguish intrastate variations (e.g. division of results into non-metropolitan and metropolitan areas). Unfortunately the data used by FSANZ's DIAMOND program also does not permit a detailed analysis by seasonality and remote geographical areas. Assessing the data at this level would require an analysis of a very small number of survey records, producing results that would not be representative of the wider population group.

5.11 Methods of detection of irradiated foods

Public submissions raised the following issues:

- It is essential to have an appropriate method for detection of irradiated fruits before the application is approved.

5.11.1 Evaluation of public submissions

Recently, the Codex Alimentarius Commission listed five methods of detection for irradiated foods, which allow for detection of food containing fat content or bone (EN 1784, 1785, 1786), cellulose, for example tropical fruits (EN 1787); and food from which silicate minerals can be isolated, herbs and spices (EN1788). In the paper for the Codex Alimentarius Commission, it was suggested that the methods provided a very high percentage of correctly identifiable samples, that these methods were currently used in some countries and were thoroughly validated.

As pointed out in one of the submissions, the method involving electron spin resonance (EN 1787) is the most relevant for tropical fruits and requires the seeds or stones of the fruit to receive the dose (detection via the soft tissue is not likely) and, it is not clear from the scientific literature that doses of relevance to Application A443 are reliably detected.

The findings of Stewart *et al* (2000) referred to in section 4.4 of the Science Report (Attachment 2) rely on the presence of 2-dodecylcyclobutanones (2-DCBs) at low doses in papaya. This may become the basis of a useful detection method, but appears to be still at the development stage, and has not been verified internationally.

MAFNZ have indicated to FSANZ that it will rely on certification (most likely an additional declaration to the accompanying phytosanitary certificate) to attest the application of the prescribed minimum dose treatment and subsequent activities (post treatment security).

Irradiation and the specific treatment dosages, like all other fruit fly disinfestation options, will be appended to the relevant bilateral quarantine arrangement (in this instance with BA), whereby documented evidence is required of the critical control points associated with the treatment processes.

In conclusion, detection methods for irradiated food offer a yes/no type of answer as to whether a food has been irradiated or not and are not meant to be used to accurately measure absorbed doses. Therefore, control of the dose is managed by proper validation of the process prior to routine processing and is established and controlled by accurate dosimetry and maintenance of records under the requirements of Standard 1.5.3.

5.12 Other Issues

Issues with respect to safety, nutritional adequacy, technological need for irradiation of tropical fruits and quality of irradiated food were re-raised in the second round of public comment. There were also a number of consumers opposed to the establishment of irradiation facilities in Queensland or in other areas of Australia.

However, with regard to the proposed Steritech Irradiation facility at Narangba, Queensland, FSANZ does not give approval for irradiation facilities; rather this is the responsibility of the Queensland Government under legislation dealing with the licensing and approval of these facilities. In section 5.7 above FSANZ has extensively detailed all the regulatory agencies involved in regulation of irradiation facilities.

There were also some issues raised in both public comment periods that were considered outside the FSANZ Act. However, FSANZ considered it necessary to provide some comments on these issues in order to facilitate information and understanding of this technology.

Other issues raised in public submissions have been addressed below or in the Questions and Answer section (Attachment 5).

5.13 Doses of Irradiation

Public submissions raised the following issues:

- Why is there a difference between doses proposed by FSANZ and those set by the USDA ?

5.13.1 Evaluation of public submissions

The dose-range 0.15-0.25 kGy relates to the USDA proposed rule in May 2000 on irradiation to establish a treatment of between 0.15-.250 kGy for 11 species of fruit fly and a treatment of 0.1 kGy for mango seed weevil regardless of host.

This dose-range is based on the technological need established by the USDA for specific pest disinfestation. This assessment still needs to be performed by BA, MAFNZ or the IPHRWG via a specific risk assessment as detailed earlier in section 5.4.

The 1 kGy maximum dose level was set by the USFDA based on food safety considerations, not the USDA (which sets levels based on technological need). Therefore, FSANZ's proposed maximum dose of 1 kGy is consistent with the maximum dose set by the USFDA.

5.14 Sources of Irradiation

Public submissions raised the following issues:

- The Applicant's request to use radiation generated by electricity has been distorted to include the use of cobalt 60. This should be corrected.

5.14.1 Evaluation of public submissions

Standard 1.5.3-Food Irradiation allow the use of gamma rays from the radionuclide cobalt 60 or from x-rays generated by or from machine sources operated at an energy level not exceeding 5 mega-electronvolts; or electrons generated by or from machine sources operated at an energy level not exceeding 10 mega-electronvolts. The Ministerial Council (ANZFSC) approved these sources of radiation for use on all food on 2 September 1999 by virtue of their established safety.

FSANZ is not aware of any reason to not allow the use of cobalt 60 sources of irradiation on tropical fruits based on safety reasons.

From the science assessment and technical advice FSANZ sought on this subject at Draft Assessment, there is both qualitative and quantitative equivalence between gamma rays and electrons with respect to physical, chemical and microbiological effects.

5.15 Import/Export issues

Public submissions raised the following issues:

- A maximum dose of 1 kGy may be used in some countries to irradiate tropical fruits where, in some cases, only a minimum dose was necessary.

- Australia and New Zealand may be required to accept highly irradiated fruits from those countries. Furthermore, if the proposed removal of the maximum dose limit of 10 kGy on irradiated foods is agreed by Codex, Australia and New Zealand may have to accept food that has been treated at up to this maximum dose of 10 kGy.

5.15.1 Evaluation of public submissions

In Australia, within the portfolio of Agriculture, Fisheries and Forestry, Biosecurity Australia (BA) has responsibility for negotiating quarantine arrangements for the import and export of plant and animal products. BA works closely with the Australian Quarantine and Inspection Service (AQIS) who have responsibility for ensuring that quarantine arrangements for imports and exports have been appropriately implemented in order to protect Australia's biosecurity and to meet the import requirements of Australia's trading partners.

In New Zealand, responsibility for negotiating requirements for imported plant products is conducted by MAFNZ who ensure that quarantine arrangements for imports are actioned in order to deliver on New Zealand's biosecurity requirements and to protect New Zealand from unwanted pests and diseases.

Importers of irradiated foods would be required to adhere to the strict provisions of Standard 1.5.3. This would mean adherence to a minimum dose of 150 Gy and the maximum limit of 1 kGy. Significant penalties exist for breaching the *Food Standards Code* (which if amended as recommended will require that the minimum dose be used to achieve the technological purpose).

Significant penalties exist for misleading or deceptive conduct under the Commonwealth Trade Practices Act, the New Zealand Fair Trading Act and State and Territory Fair Trading Acts.

If a dose higher than 1 kGy was considered necessary in some circumstances, then food treated with higher doses could not be legally sold in Australia or New Zealand unless a formal amendment to the *Food Standards Code* was made.

5.16 Potential Markets for Irradiated Tropical Fruits

Public submissions raised the following issue:

- Irradiating tropical fruit has the potential to increase market opportunities for the Australian tropical fruit industry.

5.16.1 Evaluation of public submissions

The *Food Standards Code* applies to food that is sold in Australia and New Zealand. It does, however, have implications for the movement of food between the two countries, though it does not obviate the need for other requirements, such as quarantine requirements, to be met.

5.17 Comments in relation to the purpose of the Application

Public submissions raised the following issues, based on the Applicant's arguments:

- Is there enough demand in New Zealand for irradiated mangoes from Australia?

- If there is limited demand in New Zealand, the irradiation company may try to make money by irradiating fruits for the domestic market to increase shelf life. This will lead to a market imbalance for small producers of non-irradiated fruits.

- Surebeam is using this application to 'soften up' the Australian public for future irradiation of beef.

5.17.1 Evaluation of public submissions

These issues relate to the Applicant's statements of purpose for the application. FSANZ notes that an amendment to Standard 1.5.3 would make it legal for such fruit, treated with irradiation to be sold in Australia and New Zealand.

Letters of support were received from a range of organizations and fruit growers, who argued that this change would provide an expanded market for Australian growers.

The identified technological purpose is for pest disinfestation. FSANZ acknowledges that there may be a concurrent benefit in terms of an increase in shelf life. However, previous research has suggested that only a very short shelf-life extension resulted from irradiation at 0.1 to 0.3 kGy used to suppress spoilage organisms[7]. FSANZ also recognises that some consumers do not necessarily want increased shelf life of products but consider irradiated foods with extended shelf life to not be as fresh as non-irradiated fruits. In either case, mandatory labelling will distinguish irradiated products in the marketplace.

The Applicant has informed FSANZ that the immediate intent, if approval is granted to irradiate tropical fruits, is access to the market for tropical fruits in New Zealand, provided quarantine requirements can be met.

Any further applications to irradiate other foods, for example, beef will be evaluated on merit against the requirements of Standard 1.5.3, and the objectives of the FSANZ Act for setting food standards.

5.18 Issues not directly relevant to the assessment of Application A443

- FSANZ is disregarding the principles of the review of the Food Standards Code by committing resources to considering issues not relevant to food standards setting

5.18.1 Evaluation of public submissions

FSANZ is required to make an assessment of the application in accordance with the section 10 objectives of the FSANZ Act, and its other statutory requirements.

However, food irradiation is a relatively new technology for both Australian and New Zealand consumers. By identifying and addressing their concerns this may contribute to the overall understanding of the technology. This was identified in the Steering Group assisting FSANZ with the assessment of Application A443 as being important in wider understanding of issues raised about this technology.

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[7] (Sommer NF and Mitchell F (1986) Gamma Irradiation-a quarantine treatment for fresh fruit and vegetables, Hort Science, 21, 356-360).

FSANZ recognised that there were numerous issues raised in the public submissions that are outside of its statutory requirements. However, in the interests of providing useful information to concerned parties these issues were addressed where possible.

Public submissions also raised the following issues:

- Public liability indemnity was completely ignored
- National security was ignored and there needs to be a regime of security protection of radiation equipment and nuclear isotopes and their safekeeping from terrorist activity.
- Empirical evidence of illness by US Postal Workers and others via the handling of irradiated mail were ignored
- Financial and legal status of the applicant was overlooked
- Why did FSANZ not give provisional approval for the irradiation of tropical fruits?
- Why did FSANZ not act within its Section 10 objectives?

5.18.2 Evaluation of public submissions

FSANZ's statutory functions (Section 10 objectives) do not extend to cover the first four dot points.

The matters raised in dot points 1-3 are for other agencies (e.g., the Radiation Health Section in the Queensland Health Department) that may examine such matters in their assessment of radiation licence applications. Dot point 4 is not covered under the FSANZ Act, and the other two issues (dot point 5 and 6) were dealt with under the requirements of the FSANZ Act.

With respect to dot point 5 and 6, FSANZ is charged with determining whether irradiating foods are appropriate under the section 10 objectives of the FSANZ Act. Following this assessment there was no basis for provisional approval of irradiated foods under the FSANZ Act.

As detailed in specific sections above, FSANZ undertook an extensive assessment of the safety, nutritional adequacy of irradiated foods and ensured that a specific technological need existed to irradiate tropical fruits. FSANZ also explained in detail the mandatory labelling requirements of Standard 1.5.3. These are all considerations under the Section 10 objectives of the FSANZ Act.

5.19 Good Agricultural Practice

Public submissions raised the following issues:

- There is no evidence in the draft standard that irradiation will **not** replace good production processes that are currently used by Australian growers.
- It is not clear whether Good Manufacturing Practice (GMP) will also apply to agricultural practices, what these processes are or how their use will be enforced.

5.19.1 Evaluation of public submissions

Good agricultural practice (GAP) generally relates to pesticide usage. However, in respect to tropical fruits, it may also refer to the basic environmental and operational conditions that are necessary for the production of safe food. Irradiation is not meant to replace GAP for growing of tropical fruits.

Good manufacturing practice (GMP) applies to the post-harvest processing of fruit to manufacture food products. It is not applied to agricultural practices. In response to general consumer concerns, many retailers have recently announced programs requiring growers to have independent third-party inspections of farms to certify that fruits and vegetables are being grown, harvested, and packaged using good agricultural and management practices. These programs are developing rapidly and companies, organisations and agencies approved by retailers, are already inspecting many growing and packing operations.

Conclusion-FSANZ considers that with respect to the first point that this is an enforcement issue for State/Territory and New Zealand Health Departments. FSANZ has revised the drafting to delete the term GMP as it is already a requirement in Standard.

5.20 Costs and Benefits

Public submissions raised the following issues:

- Costs and benefits are not quantified.

5.20.1 Evaluation of public submissions

Undertaking a full quantification of the costs and benefits of this application would be difficult and resource intensive. In addition it was determined that the inclusion of quantitative information would not materially affect the outcomes of the final report as the main focus was on food safety.

5.21 Trade Impacts

Public submissions raised the following issues:

- Overseas trade impact is beyond FSANZ's competence

5.21.1 Evaluation

FSANZ agrees that it is difficult to determine what the overall trade impact will be for irradiated foods. FSANZ notified Application A443 to the WTO as a TBT issue and has sought comment on this from relevant trade authorities. To date none have been received.

AQIS will ensure that imported foods meet requirements of the *Food Standards Code* through the Imported Food Inspection System. In New Zealand, the National Radiation Laboratory undertakes monitoring of irradiation facilities. The Ministry of Health and Public Health Units oversight the inspection of any imported food for compliance with New Zealand food regulations.

5.22 Irradiation-Resistant Pests

Public submissions raised the following issues:

- The potential for mutation of insect pests has not been considered, in particular, the development of radiation resistant species of mango seed weevil.

- Danger of fruit fly mutation was inadequately researched

5.22.1 Evaluation of public submissions

FSANZ sought specific technical advice on this issue. The advice was, that, based on published literature the likelihood of the formation of viable radio-resistant mutants would be extremely unlikely. This is because the irradiation doses prescribed for quarantine treatment are several times higher than necessary to sterilise the insect. If all fruit and all insects infesting tropical fruits are treated with the prescribed quarantine dose then all insects will be sterilised, if not killed outright.

Conclusion- Since the likelihood of the formation of viable radio-resistant mutants is extremely low, and furthermore, since it would be a requirement for all insects treated with irradiation as a quarantine treatment to be sterilised, if not killed outright, it is concluded that these matters will not require further consideration.

5.23 Alternatives to Food Irradiation

Public submissions raised the following issues:

- Alternatives to Irradiation are available and have not been adequately explored

5.23.1 Evaluation of public submissions

FSANZ recognises that there are alternatives that can be used for pest disinfestation and these have been outlined in the Science Report (**Section 1.2-Attachment 2**). However, FSANZ considers that irradiation is just one technology that can be used to manage pests of quarantine concern. If industry desires to use one of the other current processes and that fulfils the requirements of the relevant quarantine agencies (BA, MAFNZ or those represented by IPHRWG) then they will ultimately have the choice.

MAFNZ indicated to FSANZ that irradiation, like any other phytosanitary treatment will not be used in isolation for the control of associated pests. A suite of 'in-field' measures (insecticide sprays, biological control) and other techniques are deployed (sampling and inspections) to ensure that the commodity is pest free.

5.24 Specific Quarantine and other technical issues

5.25 Distinction between sanitary and phytosanitary treatments and the term 'disinfestation'

Public submissions raised the following issues:

- The International Plant Protection Convention (IPPC) has a specific definition of a phytosanitary measure and the definition that FSANZ used in the Draft Assessment Report was incorrect.

- The use of the broad term 'disinfestation' throughout the document, particularly in the draft variations to the *Food Standards Code*, effectively broadens the permission for irradiation of these tropical fruits to include treatments carried out for non-phytosanitary and non-quarantine reasons. The use of the word 'controlling' is inappropriate in the context of quarantine.

- The inclusion of Attachment 6 and the accompanying statements is misleading and inaccurate in its current presentation.

5.25.1 Evaluation of public submissions

FSANZ has amended the footnotes in the Final Assessment Report to include the IPPC definition above.

FSANZ has defined the term 'pest disinfestation as pertaining specifically to a quarantine measure and deleted the word 'controlling' in the Draft Variations to Standard 1.5.3.

FSANZ obtained information on the use of irradiation in other countries from the Applicant in their letter to FSANZ of 13 August 2001. However, in the interests of clarity it should be noted that these treatments could also be used for non-quarantine purposes. Attachment 6 (first paragraph) now clarifies that the uses of irradiation on tropical fruits may either be for the purpose of sanitary or phytosanitary purposes.

5.26 Specification of a minimum dose

- The specification of a minimum irradiation dose by FSANZ for phytosanitary measures is problematic and there may be misunderstandings regarding the permission without the inclusion of a statement in the comments box of the Food Standards Code to the effect of:

  the minimum effective dose for individual phytosanitary treatments must be negotiated and agreed on a bilateral basis between the relevant quarantine authorities.

5.26.1 Evaluation of public submissions

FSANZ has a legal requirement to list a minimum and maximum dose. As explained in Section 5.4 this does not negate the responsibility of BA, MAFNZ and the IPHRWG to fulfil relevant quarantine requirements under their regulations.

Legally, a food standard cannot include a requirement that is contingent on the decision of another government agency. In addition, FSANZ notes that in its information supplied to the public about irradiation, it was clearly stated that quarantine agencies would have the sole responsibility to consider phytosanitary irradiation treatments but these treatments must fall within the dose range proposed in the draft standard.

5.27 Re-irradiation

- It is not clear why **re-irradiation** should not be permitted for pre-agreed quarantine purposes as long as the total dose of irradiation does not exceed the maximum dose listed in the *Food Standards Code*.

5.27.1 Evaluation of public submissions

Under the definitions in Clause 1 of Standard 1.5.3

> **re-irradiate** does not include the irradiation of food –
>
> (a) prepared from materials that have been irradiated at low dose levels (not exceeding in any case 1 kGy) and are irradiated again; or
> (b) which contains less than 50 g/kg of irradiated ingredients; or
> (c) where the required full dose of ionising radiation is applied to the food in divided doses for a specific technological reason; provided that the cumulative maximum radiation dose absorbed by the food does not exceed that specified in the Table to clause 4.

This definition was formulated during the establishment of the Standards A17/1.5.3 and was consistent with the intent of Clause 5.2 of the current Codex standard definition of re-irradiation. The intent was to stop any unnecessary re-irradiation of a food in order to disregard GMP, particularly, in respect to food contaminated with microbes. If re-irradiation was allowed it must be with the whole dose in the expected irradiation time frame as per requirements in part (c) above.

However, if there is a need to change this requirement for a specific quarantine purpose in order to encapsulate a situation where tropical fruits would need to be re-irradiated, then an application could be made to FSANZ seeking a consideration of a change to the above definition.

5.28 Probit 9 security for quarantine pests

- Probit 9 security is not necessarily an Australian quarantine policy requirement. The Draft Assessment Report implies that this is the case and it is requested that FSANZ change the wording.

5.28.1 Evaluation

The term Probit 9 was not meant to imply an Australian quarantine policy requirement; rather it was in reference to what FSANZ had been informed was a previous requirement by Plant Biosecurity Australia for fruit fly disinfestation as detailed in the paper by Heather and Corcoran, 1990). This was qualified in the second sentence of that paragraph with the words previously provided to FSANZ:

However, Australian quarantine requirements with respect to efficacy of various treatments vary depending on the specific situation and availability of other measures for quarantine requirements. The development of an International Standard for Phytosanitary Measures (ISPM) to cover the use of irradiation as a phytosanitary treatment will ultimately provide additional guidance for Australian, New Zealand and State/Territory quarantine authorities.

The term 'Probit 9' has now been deleted in section 1.3 (**Attachment 2**).

6. REGULATORY OPTIONS

Options available are:

1. Not to permit the irradiation of tropical fruits; or
2. Permit the irradiation of tropical fruits in accordance with Standard 1.5.3, that is, where there is a technological need or it is necessary for a food hygiene purpose.

7. IMPACT ANALYSIS

Approval to irradiate tropical fruits has the potential to impact on many sectors, namely, consumers, industry and governments.

Parties affected if permission to irradiate tropical fruits is granted are:

1. Those sectors of the food industry wishing to use irradiation as a phytosanitary treatment for tropical fruits and operators of irradiation facilities and exporters.

2. Consumers who may wish to purchase irradiated fruits in order to avoid chemical residues in fruit or conversely, consumers who wish to avoid purchase of irradiated foods.

3. Government agencies enforcing the food regulations.

The Applicant has presented an argument that the use of irradiation is a technologically justified and efficacious treatment and will provide access to new markets for Australian growers.

The Applicant states that this alternative treatment will increase competition in the marketplace, improve seasonal availability, increase price competition; reduce the use of chemicals on tropical fruits; and may improve flavour of fruits available to consumers via the harvesting of more mature fruits (compared to heat treatments or maturity standards where fruit must be harvested when it is less mature).

Government regulatory agencies involved in approval for food irradiation, namely, FSANZ, AQIS, BA, MAFNZ and those represented by IPHRWG will need to ensure that irradiation at the levels proposed, in relation to the selected tropical fruits, results in food that is safe and nutritionally adequate, that there is a specific technological need and that the permitted dose is efficacious in meeting quarantine requirements. Enforcement agencies will be required to enforce labelling requirements for foods that have been treated with irradiation.

These cost and benefits to the affected parties are further expanded below under the two proposed options.

7.1 Option 1-Not to permit irradiation of Tropical Fruits

7.1.1 Benefits

<u>Consumers</u>

- Submissions stated that there would be a benefit to consumers who prefer not to consume irradiated foods, due to a belief that such foods are potentially unsafe and/or nutritionally inadequate. However, mandatory labelling would allow such foods to be avoided by those wishing to do so.

<u>Industry</u>

- No benefits to industry were identified. *Status Quo*.

<u>Governments</u>

- There are no perceived benefits in not permitting an additional pest disinfestation measure unless the scientific assessment had concluded that there is no technological need or that the food is unsafe or nutritionally compromised following irradiation.

- There may be a benefit in not approving the application, as Governments would avoid controversy, as there is significant opposition to establishment of irradiation plants and the view that production of unsafe products following irradiation and any loss of nutrition in tropical fruits following irradiation may ultimately reflect negatively on the Government.

7.1.2 Costs

<u>Consumers</u>

- No costs to consumers were identified.

<u>Industry</u>

- ▪ There may be loss of trade opportunities and access to markets where current disinfestation methods are not accepted.

Submissions also stated the following:

- Australian Industry will not develop global competitiveness and market opportunities may be lost;

- the Australian and New Zealand industry development may be reduced; and

- further costs in Research and Development in an attempt to identify alternative treatments may be incurred by industry as existing chemical or other treatments are phased out.

Governments

- No costs were identified.

7.2 Option 2: To permit the Irradiation of Tropical Fruits

7.2.1 Benefits

Submission from industry sectors suggested that the following benefits to consumers would result from this option.

Consumers

- There may be an expansion of availability of tropical fruits in some markets/regions.

- In comparison with methyl bromide, heat or cold treatments there may be a greater shelf life (although not all consumers will regard this as a benefit).

- May result in better quality fruit for the consumer depending on the dose of irradiation imparted, as the fruit can be harvested at a more mature stage than would otherwise be possible if using alternative techniques.

- Approval of irradiated tropical fruits may increase competition in the marketplace, improve selection and seasonal availability and increase price competition;

- Mandatory labelling will ensure that consumers who wish to avoid irradiated fruits can do so by clear labelling.

Industry

- Increased trade opportunities and increased markets available to tropical fruit growers.

Governments

- The application of irradiation to a range of tropical fruits concurrently may increase the efficiency of biosecurity negotiations between relevant quarantine agencies.

- Economic development in rural and regional Australia may be enhanced.

- Will provide an additional pest disinfestation treatment at a time when some methods are not accepted or are being phased out (eg some chemical treatments). This may facilitation trade.

7.2.2 Costs

Consumers

- No apparent costs to consumers have been identified other than a possible transient increase in price of irradiated tropical fruits passed onto consumers as a result of the cost of establishment of a new irradiation facility in Queensland. Competitive forces should keep this to a minimum, particularly with mandatory labelling.

Industry

- cost of labelling irradiated foods;

- there is likely to be a cost in ascertaining consumer acceptance of irradiated tropical fruits.

Governments

- The relevant Australian and New Zealand quarantine agencies must undertake bilateral negotiations to determine, on a case-by-case basis, appropriate irradiation treatments for specific pests of quarantine concern to meet relevant quarantine import requirements for individual tropical fruits. This applies to imports into Australia and New Zealand and to domestically produced fruit that is subject to interstate trade within Australia. This may require extensive risk analysis, with associated resource allocation.

Option 1 would not allow the use of irradiation on tropical fruits. It imposes costs on consumers by loss of choice where the safety and wholesomeness had been established. It may deny Australian Tropical fruits grower's access to new markets and may hinder regional development.

Option 2 allows the use of irradiation, which has been determined to be safe for pest disinfestation. The dose range listed (150 Gy to 1 kGy) has been verified by the appropriate quarantine regulatory agencies as being adequate to fulfil the technological need of pest disinfestation. However, it must be noted that FSANZ is not the appropriate regulatory body to determine whether or not the treatment is adequate to fulfil specific quarantine requirements. FSANZ has relied on advice from the relevant quarantine agencies, BA and MAFNZ and those represented by the IPHRWG. Option 2 does not subject consumers, the community or Governments to other costs other than those already highlighted.

Overall, **Option 2** is preferred because, by virtue of the scientific risk assessment, it most clearly achieves the objectives of: providing assurance of the safety of consuming irradiated fruits, providing labelling information to consumers that serve to give them informed choice, and provides a fair trading aspect to allow tropical fruits manufacturers new markets and meets Australia's requirements under the WTO by virtue of consistency with other international regulations on irradiated fruits. It also meets the requirements of Standard 1.5.3 of having a technological need and appropriate dosage levels.

8. CONSULTATION

8.1 Public consultation

8.1.1 First round

The Australia New Zealand Food Authority conducted an initial assessment (Preliminary Assessment under section 13 of the ANZFA Act 1991) on A443-Irradiation of Tropical Fruits. Public comment was called for on the application from 19 September 2001 to 31 October 2001.

A total of 61 submissions were received and are summarised in **Attachment 4**; 16 submissions supported the application, 41 did not support (included 25 signatures on two separate but individually submitted form letters), 4 did not specifically state whether they were in agreement or not.

No additional submissions were received in response to the section 13A or 14 notice required under the ANZFA to FSANZ transitional provisions.

8.1.2 Second Round

A total of 691 were received and are summarised in Attachment 4.

675 submissions	**Opposed** – did not recognise any circumstances under which food irradiation of tropical fruits should be undertaken. Also, included people opposed to the overall process of irradiation.
16 submissions	**Support** - considers the technology has been demonstrated to be safe and potentially beneficial and should therefore be permitted.

The issues raised were addressed above and in **Attachment 5**.

8.2 Advisory Group Consultation

FSANZ consulted with an Advisory Group established for a previous application (A413-Irradiation of herbs, spices, selected nuts and herbal teas), which was representative of a broad range of stakeholders with an interest in the present application.

The Advisory Group comprises of the following representation:

- Health Departments (WA, QLD, VIC, NSW, Commonwealth and New Zealand)
- Agriculture and quarantine agencies in Australia and New Zealand (Agriculture, Forestry and Fisheries Australia, AQIS and NZMAF)
- Australian Consumers Association
- New Zealand Consumers' Institute
- Australian Food and Grocery Council
- New Zealand Grocery Marketers Association Inc
- Radiation expert
- FSANZ

This Group assisted FSANZ in relation to development of the Draft Assessment Report and consideration of submissions from the public consultation rounds.

All stakeholders that made a submission in relation to the application were included on a mailing list and received further FSANZ documents in relation to the application. Other interested parties as they came to the attention of FSANZ were also added to the mailing list for public consultation.

8.3 Notification to the World Trade Organization (WTO)

Australia and New Zealand are members of the WTO and are signatories to the agreements on the Application of Sanitary and Phytosanitary Measures (SPS Agreement) and on Technical Barriers to Trade (TBT Agreement). In some circumstances, Australia and New Zealand have an obligation to notify the WTO of changes to food standards to enable other member countries of the WTO to make comments.

Amending the *Food Standards Code* to allow the use of irradiation of tropical fruits may significantly affect trade, i.e., increase market opportunities for Australian growers and increase market opportunities for overseas growers. Therefore, notification was made to the WTO as a TBT in accordance with the WTO Technical Barrier to Trade (TBT) agreements.

9. Transitional Issues

In accordance with the transitional requirements for an application which has reached Full (Draft) Assessment prior to the commencement of the FSANZ Act, the Full (Draft) Assessment has been reviewed. No relevant policy guidelines have been notified by the Ministerial Council and no additional submissions were received in response to the notice given under section 13A or 14.

10. CONCLUSIONS

The conclusions from the Final Assessment are as follows:

- there is no evidence of any public health and safety concern associated with consumption of irradiated tropical fruits and there are no significant nutritional losses of vitamins and minerals in the context of total dietary intakes from irradiated fruits at a dose of up to 1 kGy;

- a specific technological need (pest disinfestation) as required by Standard 1.5.3 has been shown to exist and a minimum dose of 150 Gy and a maximum dose of 1 kGy is considered to be an appropriate dose range to control the range of pests of likely concern. This has been confirmed by quarantine officials in Australia and New Zealand;

- mandatory labelling statements will be required to ensure that consumers are informed that the food has been irradiated;

- the proposed changes to Volume 2 of the *Food Standards Code* are consistent with the section 10 objectives of the *Food Standards Australia New Zealand Act 1991*. In particular, public health and safety, adequate information being available to consumers to make informed choices and prevention of misleading and deceptive conduct have all been considered in detail; and

- As part of the analysis of the costs and benefits required for the Regulatory Impact Statement, it was determined that, for the preferred option, namely, to approve the use of irradiation on tropical fruits, the benefits of the proposed amendment outweigh the costs.

The proposed drafting to Standard 1.5.3 of the *Food Standards Code* is shown in Attachment 1.

11. ATTACHMENTS

1. Draft variation to Standard 1.5.3 of the *Food Standards Code*
2. Report on technical, safety and nutritional aspects of irradiation of tropical fruits
3. Dietary modelling report
4. Summary of public submissions
5. General issues raised in public submissions
6. List of other countries that irradiate fruits
7. Chemiclearance fact sheet
8. Consumer and Industry Perception of Irradiated Foods (Executive Summary)

ATTACHMENT 1

*DRAFT VARIATIONS TO STANDARD 1.5.3 of **THE*** **FOOD STANDARDS CODE**

To commence: on gazettal

[1] ***Standard 1.5.3*** *of Volume 2 of the Food Standards Code is varied by inserting in the* Table to clause 4 –

Bread fruit Carambola Custard apple Longan Litchi Mango Mangosteen Papaya (Paw paw) Rambutan	Minimum: 150 Gy Maximum: 1 kGy	Food may only be irradiated for the purposes of pest disinfestation for a phytosanitary objective. The minimum dose to achieve the above technological purposes.

ATTACHMENT 2

Report on the Technical, Safety and Nutritional Aspects of Irradiation of Tropical Fruits

SUMMARY

Technological Need to Irradiate Tropical Fruits

Disinfestation of the specified tropical fruits by irradiation treatment is a valid technological need for the purposes of Standard 1.5.3. Insect pests of quarantine significance to importing countries represent a major barrier to overcome in gaining access to some markets. E-beam and X-ray irradiation techniques are an efficacious pest disinfestation method for tropical fruits, with a capacity to attain an equivalent level of efficacy when compared to current alternatives (chemicals, heat, cold treatments and manipulating maturity standards).

Safety of Irradiated Food

The safety of food irradiation has been evaluated in animals and humans. The available studies on fruits indicates that there are no toxicological concerns and no compounds are formed following irradiation that are likely to cause public health and safety concerns.

Previous expert committees under the auspices of the World Health Organization reviewed numerous safety studies. The overall conclusion is that irradiation of tropical fruits up to a maximum of 1 kGy employing Good Manufacturing/Irradiation Practices is safe for Australian and New Zealand consumers.

Nutritional quality of irradiated tropical fruits

The Nutritional analysis suggested that irradiation potentially causes both macro and micronutrients changes in foods, depending on the irradiation dose, the food's composition and environmental conditions. Therefore, as a form of food processing, irradiation will have some impacts on the nutrient status of foods; however, there are few indications that these impacts are any greater than other forms of food processing, especially for irradiation doses less than 10 kGy. In summary, the previous research indicates that carbohydrates, proteins, fatty acids, minerals and trace elements in tropical fruits undergo very minimal alteration during irradiation, although selected vitamins are affected following irradiation of tropical fruits.

1. Introduction

1.1 Technological need

The intent of technological need in Standard A1/1.5.3 is that irradiation can be used where a recognised technological need exists. With respect to this application, the Applicant has sought permission to use irradiation as a phytosanitary measure to prevent the introduction and/or spread of quarantine pests-on tropical fruits.

Pest infestation of food commodities, in particular, tropical fruits is a worldwide quarantine problem. Irradiation is currently used in other countries (other than Australia and New Zealand) as a phytosanitary measure to prevent the introduction and/or spread of quarantine pests. Irradiation essentially offers plant quarantine authorities with a further disinfestation measure to current methods employed, some of which are not acceptable in some markets, or are being phased out.

1.2 Current disinfestation techniques

Consideration of irradiation as a phytosanitary treatment is the responsibility of the relevant quarantine authorities, namely, Biosecurity Australia (BA), the Ministry of Agriculture and Forestry New Zealand (MAFNZ) and the Australian State and Territory authorities represented by the Interstate Plant Health Regulation Working Group (IPHRWG). Quarantine authorities generally require a very high degree of efficacy for phytosanitary measures targeting critical quarantine pests.

Quarantine disinfestations treatments for commodities can be accomplished by a variety of means, such as pesticide applications, chemical fumigants, extreme temperatures, low-oxygen atmospheres and ionising radiation (Hallman, 2001). The Interstate Certification Assurance (ICA) is a national scheme set up to govern the movement of tropical fruit in Australia. Plant health certification adopted by the ICA is accepted by all Australian States and Territories; current disinfestation treatments approved for use on the specified tropical fruit include: the use of post harvest chemicals, heat treatment, maturity standards, cold treatment and unbroken skin (ICA, 2001).

Chemical treatments are based on the use of dimethoate, fenthion and methyl bromide. The use of post-harvest chemicals is under review worldwide due to concerns about potential health effects associated with chemical residues. Methyl bromide is recognised as an ozone depleting agent and Australia has agreed to reduce the use of methyl bromide, with total phase out for non-quarantine uses by 2005. Post harvest chemical dips and sprays (fenthion, dimethoate) are under review for environment, and workplace health and safety reasons.

Heat treatment (hot air or hot water at specified temperature for specified period of time) is currently approved for mango and papaya for interstate trade. Heat treatments are not widely adopted by tropical fruit growers, as product losses tend to be unacceptably high. Research undertaken in Australia has shown, whilst, heat treatment is efficacious for most fruit fly species at 47°C, it is not effective for all species at specified time/temperature periods. Beyond this temperature range tropical fruit can become irreparably damaged (ICA, 2001).

Manipulating maturity standards by harvesting unripe fruit less attractive as a fruit fly host can be effective, but determination of treatment efficacy is an arduous process. The quality issue is a major disadvantage with immature fruit an unattractive product due to firmness, lack of colour, and reduced flavour.

Cold treatment is not a viable measure for tropical fruit with product damage and high costs under Australian conditions making it economically unsustainable. Unbroken skin is not a reliable indicator of fruit fly infestation and may not meet stringent quarantine requirements of importing countries.

The range of disinfestation treatments currently approved for use on the specified tropical fruits for interstate trade in Australia do not meet MAFNZ quarantine requirements and consequently, no trade is possible from Australia to New Zealand in tropical fruits.

1.3 Benefits of irradiation as an alternative technology for disinfestation of tropical fruits

For quarantine pest disinfestation of commercial commodities in international trade, irradiation is one risk management option that may be selected to mitigate relevant quarantine risks identified through a pest risk analysis.-Standard 1.5.3, clause 4 of the *Food Standards Code* states that foods may only be processed by irradiation where this is in accordance with Good Manufacturing Practice (GMP) and such processing (a) fulfils a technological need; or (b) is necessary for a purpose associated with food hygiene.

The purpose of using irradiation is disinfestation of fruit fly-(Heather and Corcoran, 1990). Quarantine requirements with respect to efficacy of various treatments vary depending on the specific situation and availability of other measures for quarantine requirements. The development of an International Standard for Phytosanitary Measures (ISPM) to cover the use of irradiation as a phytosanitary treatment will ultimately provide additional guidance for Australian, New Zealand and State/Territory quarantine authorities.

Determination of an appropriate radiation treatment is likely to focus on a minimum level that enables quarantine requirements to be fulfilled, whilst limiting the damage to the tropical fruit. The Applicant claims that a delay of ripening and senescence in tropical fruit is an ancillary benefit stemming from the use of irradiation.

Irradiation for the purpose of disinfestation, in particular fruit fly, does not require deep penetration radiation but rather a dose that has the power to reach the eggs which reside on the surface or the mesocarp of the fruit, which is the habitat of fruit fly larvae. Irradiation doses of up to 1 kGy on tropical fruits are used as a phytosanitary measure, with considerations regarding the level of the doses likely to focus more on the minimum dose required to prevent unacceptable changes in the quality of fruit without compromising treatment efficacy.

Determining an appropriate level of radiation dose for particular irradiation treatments is dependent upon variables such as the target pest, the penetrability of the exocarp of the fruit and other measures that may contribute toward fulfilling quarantine requirements. MAFNZ, BA and the IPHRWG to date have not been provided with technical data or equivalent supporting irradiation phytosanitary treatments in order to undertake an in-depth analysis.

2. Nature of the Irradiation Process

Food irradiation is a processing technology that exposes food to a source of ionising energy. Safe food irradiation techniques require exposure to a source of ionising radiation of known energy under specific time and environmental conditions to produce a desired result.

Standard 1.5.3 permit the following sources of ionising radiation; Cobalt 60 sourced gamma rays, machine operated X-rays, and high-speed electrons generated by an electron beam.

Cobalt 60 is obtained as highly refined Cobalt-59 pellets that are converted into a radioactive gamma source in a nuclear reactor via neutron activation. The pellets are placed in a stainless steel capsule in the form of a ‘pencil’ to minimise self-absorption and heat build-up. With this configuration, about 95% of the emitted energy is available for use. Because gamma radiation does not elicit neutrons, meltdown and chain reactions cannot occur, and irradiated foods and their packaging are not made radioactive. The gamma energy penetrates the food and its packaging but most of the energy passes through the food leaving no residue, although a small amount of energy is retained as heat (WHO, 1994).

The advantages of Cobalt-60 as an irradiation source are: its high penetration and good dose uniformity, and this allows effective treatment of products of variable size, shape and density. Disadvantages include; a half-life of 5.3 years, so that 12% of the source must be replaced annually to maintain the original strength; and a rather slow processing rate compared with electron beam irradiation. Radiation facilities using Cobalt-60 also require the construction and operation of source storage (a water pool or dry storage), source handling (generally using electrical power and gravity), and massive shielding to protect workers and the environment (WHO, 1994).

In contrast to the gamma-emitting isotope sources, the radiation from electron beam (e-beam) and X-ray machines is produced electronically. E-beam is a stream of high-energy electrons propelled out of an electron gun. A significant advantage of e-beam accelerators is that they adapt to different radiation process requirements. This includes different beam energies and using dual radiation fields (particles or X-rays). E-beam accelerators also have an advantage in that the source does not need to be replenished, meaning there is no recycling or storage of wastes as is the case with Cobalt-60 isotopes. Safety advantages of e-beam are offered by having an on/off accelerator source option, and this factor facilitates easy adaptation to processing and portability (Lagunas-Solar, 1995).

X-rays are an outgrowth of e-beam technology having a greater penetration than electrons and are generated by impacting high-energy electrons on to a suitable target. To produce X-rays a beam of electrons is directed at a thin plate of gold or other metal, producing a stream of X-rays coming out the other side (USDHS, 1999).

A number of studies have compared the effects of electron beam, gamma rays and X-rays; but comparison between these technologies is inconclusive due to differences in the doses applied. Electrons (10 MeV) have a limited penetration depth of about 5 cm in food, while X-rays have significantly higher penetration depths (60 - 400 cm) depending upon the energy used. X-rays consequently require heavy shielding for safety, however, like e-beams the machine can be switched on and off, and no radioactive substances are involved (USDHS, 1999).

3. General Aspects on the Safety of Food Irradiation

3.1 Overview of previous safety studies performed on irradiated foods

The safety of irradiated food has been examined through numerous animal and human feeding studies performed over a number of years. These have been performed in a range of animal species, namely, rats, mice, dogs and monkeys, and have consisted of both short and long-term studies. Various expert committees have assessed the results of these studies in order to examine whether there are any toxicological concerns following consumption of irradiated foods. These studies have provided no evidence that irradiated foods, in particular, irradiated tropical fruits in the diet leads to toxicological concerns (**Appendix 1**).

The following sources of radiation were used in these toxicological studies:

- Gamma rays from either Caesium 137 or Cobalt 60; and
- E beam from electrons.

As gamma rays or e-beams/x-rays are ionising radiation when they interact with a medium electrons are produced which scatter in many directions. These scattered electrons cause ionisations and excitation of the medium (eg food) and this leads to radiation-induced chemical changes in the irradiated medium. However, these radiolytic changes are largely the same, regardless of whether gamma rays, e-beams or x-rays are used as the source of irradiation (Diehl, 1995). Consequently, there is both qualitative and quantitative equivalence between gamma rays and electrons with respect to physical, chemical and microbiological effects.

The early studies on the safety of irradiated food led to the adoption of a 10 kGy limit by the Codex Alimentarius Commission (Codex) in 1983, following the recommendations of a 1980 Joint Expert Committee on Food Irradiation Report (JECFI, 1980). At that time the anticipated applications (eg inhibition of sprouting, insect disinfestation, extension of shelf life and control of microbes in meat, poultry, fish) for irradiation of food would require doses of less than 10 kGy. The Committee concluded that irradiation of any commodity up to an overall average dose of 10 kGy presented no toxicological hazard; hence testing of foods so treated was no longer required. Since that time the safety of high dose irradiated foods (above 10 kGy) has been evaluated in many feeding studies with a variety of diets in animals and humans as detailed in the 1999 WHO Report.

3.2 World Health Organization and other reports on the safety of irradiated foods.

In addition to reports on the safety of irradiated foods from the World Health Organization (WHO, 1994 and 1999), irradiated foods have been previously evaluated for safety by national and international expert panels (SCF 1986, 1998; NFA Denmark 1986; JECFI 1964, 1969, 1976, 1980). The available research supports the safety of irradiated foods when processed under Good Manufacturing Practices. This conclusion has been reached by a number of independent organisations, namely, the WHO, Codex, the US Food and Drug Administration (FDA), American Dietetic Association, Institute of Food Science and Technology, Institute of Food Technologists and the Council for Agricultural Science and Technology (Doyle 1999).

The 1994 WHO Report specifically addressed the application of food irradiation, induced chemical changes, the detection, toxicology, microbiology and nutritional quality of irradiated food as well as responding to the commonly expressed concerns about irradiated food.

The final Report concluded that:

> *A review of the available scientific literature indicates that food irradiation is a thoroughly tested food technology. Safety studies have so far shown no deleterious effects. Irradiation will help to ensure a safer and more plentiful food supply by extending shelf life and by inactivating pests and pathogens. As long as requirements for good manufacturing practices are implemented, food irradiation is safe and effective. Possible risks resulting from disregard of good manufacturing practice are not basically different from those resulting from abuses of other processing methods, such as canning, freezing and pasteurisation.*

A more recent 1999 WHO Report of the toxicological data concluded the following:

- food irradiation is, toxicologically, perhaps the most thoroughly investigated food processing technology;
- animal studies are suitable models and predictions from them are supported by human studies;
- a large number of toxicological studies, including carcinogenicity bio-assays and multigenerational reproductive toxicology evaluations, did not demonstrate any short-term or long-term toxicity related to the irradiation process; and
- foods that are appropriately prepared, packaged and, under proper conditions, irradiated to high doses for sterilisation should be deemed safe.

The 1999 Study Group on High Dose (WHO 1999) does not mention a specific high dose up to which food is safe. It specifically talks about irradiated foods being wholesome throughout the technologically useful dose range. It indicates that high dose irradiated food will be unsaleable through loss of quality prior to any onset of concerns about toxicity. Codex is now considering removal of the 10 kGy limit from its General Standard as a result of the conclusions in this report.

4. Toxicological Issues

Toxicological issues in relation to irradiated foods is centred around the possible production of new chemical products arising following irradiation treatment, which to date have not been found from more traditional processing of food, e.g., heating of foods.

There have been an extensive number of specific toxicological studies on irradiated foods as discussed in section 3 above; however, by virtue of previous safety studies performed on particular food groups (eg fruits) that data can in fact be used to support the safety of similar food products (eg tropical fruits). This concept is explained in section 4.2 below.

4.1 Production of radiolytic products

When food is irradiated, a large number of new compounds (radiolytic products[8]) are formed but at a small total concentration. The concentration of each individual compound is extremely low. The majority of these compounds have been shown to be present in either some unprocessed foods or in thermally processed foods. The remainder are similar in chemical structure to chemicals found in either unprocessed foods or in thermally processed foods. A few could be unique to the irradiation process (refer to section 4.2 below).

The three major macronutrients, carbohydrates, proteins and lipids, give rise to different types of radiolytic products following irradiation. However, research has found that the majority of these compounds are not unique to irradiation but similar compounds are formed during ordinary cooking, steaming, roasting or thermal processing, pasteurisation and freezing or are naturally present in food (Diehl, 1995). Furthermore, at the cellular level, some radiolytic products (for example, hydrogen peroxide and the free radical superoxide) are produced within human cells. Biochemical mechanisms exist for neutralisation of free radicals.

4.2 The concept of chemiclearance

Chemiclearance is the term used to refer to the toxicological analysis and wholesomeness assessment of irradiated foods that is linked to the chemistry occurring during the irradiation process. Chemical analysis of irradiated foods and sophisticated probe technologies have enabled scientists to predict the types and amounts of either radiolytic products that can be formed or constituents that can be changed in foods irradiated at a given dose under specified conditions (Lagunas-Solar 1995). Such changes are minor, but could have an impact on wholesomeness, which is defined as safe to consume and nutritionally adequate.

This concept arose in the early considerations of toxicological aspects of irradiated foods by the Joint Expert Committee on Food Irradiation (JECFI, 1964). The Committee suggested at that time that as experience in irradiating a range of foods became more complete it would be possible to extrapolate data regarding the wholesomeness of treated classes of foods to related members of that class. This concept was further considered by JECFI (1969) and it was recommended that, based on the extensive work at that time on the identification and production of radiolytic products following irradiation, foods could be grouped into broad classes with regard to the uniformity of their behaviour in response to irradiation (Elias and Cohen, 1983).

The term chemiclearance was initially proposed by Basson (1977) and was applied in evaluating the wholesomeness of irradiated fruits (Elias and Cohen; 1983; Diehl, 1995). The 1980 meeting of JECFI (1981) reconfirmed the usefulness of the chemiclearance approach in its recommendation of the 10 kGy upper limit for irradiation of food.

An overview of the literature was undertaken whereby a comparison was made of the radiolytic products produced following irradiation of starches, meats and fruits (Basson, 1983; Basson et al, 1983; Merrit and Taub, 1983). It was concluded that foods with similar chemical composition would yield a similar spectrum of predictable radiolytic products.

[8] A radiolytic product is defined as a chemical compound that originates during irradiation of food and can increase in yield with increasing dose (WHO, 1999).

Hence, within classes of food the results of toxicological studies (eg animal feeding studies or genotoxicity tests) on individual foods could be extrapolated to members of the same class (Basson, 1983).

Applying the concept to irradiated meats**,** it was observed that the same type of protein-derived and lipid derived radicals are observed following irradiation (Taub et al, 1980; Taub, 1981; Merrit and Taub, 1983). These authors found similarity in the electron spin resonance (ESR) spectra from pork, ham, beef and chicken when irradiated to 50 kGy and concluded that chemical data could be used to clear classes of meats (beef, pork, ham, bacon and chicken) on the basis of the similarity in the chemistry. Studies on volatile and non-volatile products derived from fatty acids, fatty acid esters and oils also show a consistency in chemistry (Nawar, 1978) and that products formed in cereals are the same as those formed in pure starches and have the same ESR spectral characteristics (Raffi et al, 1981).

In 1979 an FDA advisory committee concluded that any foods irradiated at levels up to 1 kGy or foods comprising no more than 0.01% of the daily diet irradiated up to 50 kGy are safe for human consumption without any toxicological testing (USFDA, 1986; Murano, 1995; Pauli and Tarantino, 1995). In 1980, the WHO joint committee concluded that the irradiation of any food commodity up to an overall average dose of 10 kGy presents no toxicological hazard; hence, toxicological testing of foods so treated is no longer required (JECFI, 1980). Current WHO recommendations impose no upper dose limit, because irradiated foods are deemed wholesome throughout the technically useful dose range from below 10 kGy to envisioned doses above 10 kGy (WHO, 1999).

There is also a microbiological counterpart to this assessment of safety that is based on the principle that microorganisms irradiated in similar foods will show a common response, as reflected in their D_{10}-values[9] (Thayer, 1995 and 1997).

4.3 The practical application of chemiclearance

Animal and human feeding studies have not been conducted on every possible food. However, studies on a wide range of foods have established that foods of similar class and composition react similarly following irradiation as discussed above (**4.2**). Therefore, the results of studies on a particular class of food can be extrapolated to others (WHO, 1994 and 1999).

Chemiclearance can be used in two ways:

1. foods of similar composition that are irradiated under similar conditions have similar chemical responses and they are, accordingly, toxicologically equivalent; and

2. if a food in a class of similar foods is safe and adequate for consumption following irradiation, then other members of that class are considered, correspondingly, wholesome.

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[9] The D_{10} value is the dose required to reduce the microbial population by 90%.

From a safety point of view, foods of animal origin such as beef, pork, chicken and fish are quite similar in macronutrient composition so safety data on any of the irradiated foods can be viewed as being relevant to the whole class of foods and constituting a single database. Similarly, data on irradiated plant products such as vegetables and grains, herbs and spices, fruits and other plant products can be used for the whole class (WHO 1994).

With respect to lipids, the mechanisms by which radiolytic products are formed involve reactions common to both saturated and unsaturated fatty acids as well as reactions specific to unsaturated fatty acids. Accordingly, fish is included in the same class as the other muscle foods, due to the similarities in proteins and since the differences in unsaturation lead to predictable differences in radiolytic products (Diehl, 1995; Elias and Cohen, 1983).

Therefore, on the basis of the chemistry of proteins, lipids and starches, it has been concluded that radiolytic products produced even at doses above 10 kGy (WHO 1999) are similar to those already detected at doses below 10 kGy (WHO 1994). Therefore, irradiation of foods**,** for example, spices at high doses, either alone or as ingredients in another food will not lead to the formation of chemical entities that have not previously been identified (WHO 1999). As such, comparable food products reflecting similar chemical profiles should not need to be separately tested for safety and nutritional adequacy.

4.4 Studies on 2-alkylcyclobutanones (2-ACBs)

2-ACBs have been recently identified as possible unique radiolytic products following the irradiation of food.

Several 2-ACBs are used as markers to detect irradiated foods (Stevenson *et al*, 1990) and since 1996 a European Standard to detect fat-containing irradiated food has been promulgated (EN: 1785: 1996). More recently 2-ACBs have been found to be markers for detection of irradiated tropical fruits, in particular, mango and papaya (Stewart *et al* 2000). 2-tetradecylcyclobutanone (2-TCB) was identified as the main marker for irradiated mangoes and could be detected in samples following storage for 14 days at 10°C at doses of 0.1 kGy. 2- dodecylcyclobutanone (2-DCB) was identified as the principal irradiation marker in papayas, although 2-DCB decreased significantly over time, so that by day 21 of storage at 10°C it could only be detected at a dose of 2 kGy. 2-Tetradecenylcyclobutanone (2-TDCB) was also detected in irradiated mango and papaya, although its use as a marker was dose limited to 0.5 kGy or greater (Stewart *et al*, 2000).

Therefore, this study suggests that mangoes and papayas contain all three of the 2-ACBs, although it has yet to be determined whether other fruits in the tropical fruits class also contain 2-ACBs. The relative percentage of fatty acids and type (eg palmitic versus oleic) in these fruits varies (Table 1 and 2) which determines the presence of the specific 2-ACBs (Stewart *et al*, 2000). Overall, the percentage of these fats that can produce 2-ACBs in tropical fruits is low (Table 1).

Table 1: Fat content of tropical fruits g/100 g edible portion

Fruit#	Saturated Fat	Polyunsaturated Fat	Monounsaturated Fat
Carambola*	0	0	0
Custard Apple*	0.2	0.1	0.2
Mango*	0	0	0
Rambutan*	0	0	0
Litchi**	0.1	0.1	0.1
Breadfruit**	0.05	0.03	0.07
Papaya**	0.04	0.04	0.03

Legend:
* Australia New Zealand Food Authority 1999. AUSNUT - Australian Food and Nutrient Database. Australia New Zealand Food Authority. Canberra.
** US Department of Agriculture, Agriculture Research Service (2001). USDA Nutrient Database for Standard Reference.
\# No data could be identified for Mangosteens and Longans

Table 2: Fatty Acid Composition of Tropical Fruit g/100g edible portion

Fruit#	Lauric 12:0	Myristic 14:0	Palmitic 16:0	Stearic 18:0	Palmitoleic 16:1	Oleic 18:1	Linoleic 18:2	Linolenic 18:3
Carambola*	0	0	0.012	0.008	0	0.031	0.164	0.028
Mango*	0.001	0.007	0.052	0.003	0.048	0.054	0.014	0.037
Litchi**	0	0.002	0.07	0.024	0.001	0.119	0.067	0.065
Breadfruit**	0	0	0.031	0.017	0.002	0.032	0.048	0.018
Papaya**	0.001	0.007	0.032	0.002	0.02	0.018	0.006	0.025
Mean	0.0004	0.0032	0.0952	0.045	0.0142	0.238	0.0598	0.0476

Legend:
* Australia New Zealand Food Authority 1999. AUSNUT - Australian Food and Nutrient Database. Australia New Zealand Food Authority. Canberra.
** US Department of Agriculture, Agriculture Research Service (2001). USDA Nutrient Database for Standard Reference.
\# No data could be identified for Custard Apple, Rambutan, Mangosteens and Longans

A recent study suggested that 2-DCB caused DNA strand breaks in cells from the large bowel of rats and humans when they were incubated *in vitro* with 2-DCB (Delincee and Pool-Zobel 1998). The study indicated that 2-DCB in the concentration range 0.3-1.25 mg/ml produced cytotoxicity and an associated weak effect in DNA. However, the significance of the result is still not clear since only one genotoxicity test (the Comet Assay), which has not been validated for regulatory purposes, had been used.

In relation to the significance of this study following irradiation of tropical fruits the following can be concluded:

- the observed DNA strand breaks may well be the result of cytotoxicity and the use of relatively pure compounds which would not simulate the concentrations of 2-DCB following irradiation of whole foods;

- *in vitro* studies in isolation cannot be linked to potential hazards without other evidence, eg, *in vivo* studies;

- the concentrations of ACBs following irradiation are extremely low; and

- the low percentages of fats in tropical fruits make it unlikely that 2-ACBs are of any toxicological significance and consequently pose any risk to human health.

In a subsequent follow up *in vivo* study rats received 2-DCB at doses of 1.12 or 14.9 mg/kg bw and then cells from the colon were isolated and a Comet assay performed (Delincee H et al, 1999). The following was concluded:

[*... At higher concentrations of 2-DCB (14.9 mg per kg body weight) a small but significant DNA-damage in the experimental group was observed. Further studies are necessary in order to evaluate the relevance of these findings for risk estimation with regard to the consumption of irradiated food*.] (Translated by Ehlermann D., personal communication).

4.5 The concept of equivalence as it applies to irradiation

Although there have been extensive feeding studies conducted on irradiated foods, the concept of irradiated foods being equivalent to non-irradiated foods, which may have been treated with other food processing techniques, is appropriate and has been previously considered by international organisations (WHO 1994, 1999).

Irradiation of food can be considered analogous or equivalent to other processes used to improve food safety and quality, namely, heating, canning, steam sterilisation and freezing. In other words, irradiation shares the common function of eliminating biological hazards in food without the formation of physical or chemical constituents that may constitute a hazard (WHO 1999). Data indicate that irradiated foods do not contain either measurable levels of radioactivity or toxicologically significant levels of radiolytic products.

4.6 Conclusions of the Toxicological Issues

- When food is irradiated, several new compounds (radiolytic products) are formed but their total concentration is very low.

- Virtually all the radiolytic products (except possibly for 2-ACBs) that have previously been found in irradiated foods are either naturally present in food or produced in thermally processed foods.

- The available data does not suggest that 2-ACBs are of toxicological concern to consumers following consumption of irradiated tropical fruits.

- Based on the concept of chemiclearance, the previous studies on fruit (including tropical fruits) indicate there is no evidence that irradiated fruit in the diet leads to safety concerns.

- The past safety studies performed on irradiated fruits indicates that the treatment does not raise any safety concerns beyond those raised by conventional treatment of fruits.

5. Nutritional Issues

5.1. Nutritional implications for irradiated food

Macro and micronutrients of food are sensitive to food processing methods including irradiation. The effect of irradiation on the nutritional quality and flavour characteristics of food depends on the level of irradiation treatment, the food's composition and structure, and environmental conditions (Diehl, 1981). Research indicates that any irradiation effects on micronutrients increases in a dose-dependent relationship, and nutrient losses are comparable to other food processing techniques, for example drying and heating (ACINF 1986; Diehl, 1981; Diehl, 1995; WHO, 1999). Generally, it is concluded that, 'irradiation of food up to an overall average dose of 10 kGy introduces no special nutritional … problems' (WHO, 1981).

The material provided by the Applicant while not explicitly cited within the Nutrition Report at Draft Assessment, was used in establishing the nutritional impact of irradiating tropical fruits. Of particular significance were the following articles: Mitchell GE (1992), McLauchlan RL (2001), and McLauchlan R et al. (1987). These articles were used as a basis for determining the effects of irradiation on at-risk nutrients such as vitamin C and beta-carotene, and on various tropical fruit species (below).

5.2. Impact of conditions under which irradiation is conducted

The nutrient content of irradiated foods is affected by environmental conditions, exposure to oxidising agents and storage conditions (Diehl, 1995, WHO, 1994). Low -temperature and oxygen free food irradiation assists in minimising any potential nutrient degradation during processing (Diehl, 1995, WHO, 1994).

5.3 Specific nutrients

5.3.1. Macronutrients

The particular effect of irradiation on the nutritional value of proteins, carbohydrates and fats depends on the composition of the food, the irradiation conditions (for example low temperature environments and oxygen-free conditions) and the storage conditions (for example oxygen-free packaging, low temperature and storage duration) (Diehl, 1991, Diehl, 1995, Olson, 1998). The research indicates that the effect of irradiation on the nutritional quality of proteins, carbohydrates and fats in tropical fruits is minimal due to the particular composition and characteristics of tropical fruit (Diehl, 1991, Diehl, 1995, WHO, 1999). Irradiated mangos have similar macronutrient profiles during ripening to non-irradiated mangos (Gholap et al 1990, Diehl 1995). Furthermore, there is a very low susceptibility to any oxidation processes that may be directly related with irradiation processing (Diehl, 1995).

5.3.2. Minerals

From the scientific research there is no evidence that irradiation has any effect on the minerals and trace elements in foods (WHO, 1994), and that the bioavailability of these elements is not affected by current irradiation techniques (WHO, 1994, WHO, 1999).

5.3.3. Water-soluble vitamins

The effects of irradiation on the retention and destruction of water-soluble vitamins varies from food to food and depends on several factors. These include irradiation dose, environment (for example low temperature), storage conditions and the presence of oxygen.

The research (WHO, 1999, Diehl, 1995) indicates the order of vitamin sensitivity to irradiation to be, from most sensitive to least sensitive:

Vitamin B_1 → Vitamin C → Vitamin B_6 → Vitamin B_2 → Folate→ Cobalamin (B_{12})

The primary sources of vitamin B_1, vitamin B_2, vitamin B_6, folate (and associated derivatives) and vitamin C in the human diet are collectively: grains, wheat-based products, yeast-based products, fruits, vegetables, meat and dairy products (WHO, 1999, Diehl, 1995). The tropical fruits that are the subject of this application (i.e. the 'selected tropical fruits') are a very minor dietary source of these vitamins in the context of the total diet, over time, due to low and variable consumption levels (Diehl, 1995, WHO, 1994). Refer to **Attachment 3** for Australian and New Zealand dietary intake assessment information in relation to vitamins B_1, C and folate, as being the respective nutrients most relevant to the selected tropical fruits.

5.3.4. Fat-soluble vitamins and associated pre-cursors

Similar to the water-soluble vitamins, the sensitivity of fat-soluble vitamins to radiation varies according to the specific food, irradiation dose, environmental and storage conditions. In general, the order of sensitivity for fat-soluble vitamins to irradiation is as follows, from most sensitive to least sensitive, (Diehl, 1995, WHO, 1994):

Vitamin E → β-carotene → Vitamin A → Vitamin K → Vitamin D

The primary sources of vitamin E, β-carotene, vitamin A, and vitamin K in the diet are collectively: oils, red and orange fruits, red and green vegetables, wholegrains, yeast-based products, meat and dairy products. Although the specified tropical fruits are dietary sources of some of these vitamins and associated pre-cursors, the dietary intake assessment indicates that these foods are very minor contributors, due to low consumption levels within the context of the total diet (Diehl, 1991, Diehl, 1995). Refer to **Attachment 3** for Australian and New Zealand dietary intake assessment information in relation to β-carotene, as being the respective nutrient most relevant to the selected tropical fruits.

5.4 Key nutrient profile of selected tropical fruits

In order to identify the micronutrients that may be at-risk in relation to the dietary intakes of Australian and New Zealand populations (in the context of this application), the nutritional profile of the selected tropical fruits has been considered and key micronutrients identified. Due to a paucity of data on some of these micronutrients for the selected foods not all values have been obtained. Note that papaya is sometimes referred to as pawpaw in Australia and New Zealand, however the two names actually apply to separate species of tropical fruit (*C. papaya* and *A. triloba* respectively). In the interests of consistency with the application, papaya will only apply to *C. papaya* throughout this document.

Table 1. Key micronutrient profile of selected tropical fruits per 100 g edible portion

Fruit	β-carotene µg	Vitamin C mg	Vitamin B_1 mg	Vitamin B2 mg	Preformed Niacin mg	Folate µg
Breadfruit*	N/A	29	.11	.03	.9	14
Carambola #	20	35	.02	.04	.6	2
Custard Apple #	5	43	.05	.08	1.0	5
Litchi*	N/A	72	.01	.07	.6	14
Longan*	N/A	84	.03	.14	.3	N/A
Mango #	2370	28	.02	.04	.9	3
Mangosteen**	N/A	4	.03	.03	.3	N/A
Papaya*	N/A	62	.03	.03	.3	38
Rambutan #	0	78	.02	.06	1.0	2

Legend:
Australia New Zealand Food Authority 1999. AUSNUT - Australian Food and Nutrient Database. Australia New Zealand Food Authority. Canberra.
* US Department of Agriculture, Agriculture Research Service (2001). USDA Nutrient Database for Standard Reference.
** Ministry of Agriculture, Malaysia: http://agrolink.moa.my/comoditi/manggis.html
N/A Not Identified

Extensive research on the impact of irradiation on carotenoid content has produced differing results from no effect on pineapples irradiated at 2.45 kGy through to 2-7% carotenoid losses in wheat irradiated at 1 kGy (WHO, 1994). Of the B vitamins, vitamin B_1 is arguably the most sensitive however, such losses are also largely influenced by access to oxygen during processing and storage (WHO, 1994). Major decreases in vitamin C activity were reported by early studies where relatively high doses of irradiation were used however, 'more typical' examples are cited in WHO (1994) where doses of less than 1 kGy applied to oranges have not shown significant effects. The subsequent storage conditions are potentially more significant in relation to vitamin C activity retention than the process of irradiation. Folate is considered to be considerably less vulnerable, and possibly not affected at all (Muller, 1991, as cited in WHO, 1994) but has been modelled in order to provide a more complete assessment.

On the basis of the above nutrient profiles, and the relative susceptibility of various micronutrients to irradiation, a dietary intake assessment has been used to further consider the contribution of the selected tropical fruits to the overall dietary intakes of β-carotene, vitamin B_1, vitamin C and folate (refer to Dietary Modelling report-**Attachment 3**).

5.5 Conclusions of the nutritional issues

- Irradiation potentially causes both macro and micronutrient changes in foods, depending on the irradiation dose, the food's composition and environmental conditions. The impact of irradiation on nutritional status of the New Zealand and Australian populations however, will be dependent on the level of intake of irradiated foods.
- In respect of macronutrients, the irradiation of the selected tropical fruits does not cause significant changes in the protein, carbohydrate and saturated fatty acid content of foods.

- The available data indicates that minerals and trace elements in food are not affected by irradiation. Therefore, the irradiation of the selected tropical fruits is unlikely to significantly affect the presence of these minerals from these foods.

- There is evidence to indicate that certain vitamins (i.e. vitamin E, vitamin C, thiamine and beta-carotene are decreased to some degree in the irradiation process. This aspect of food irradiation will therefore have the greatest impact on the nutritional content of tropical fruit and subsequently a detailed dietary exposure assessment has been performed (**Attachment 3**).

6. Overall Conclusions

The overall conclusions are as follows:

- There is an established technological need to irradiate tropical fruits for the purposes of pest disinfestation;

- International scientific opinion is that irradiated food is safe when the irradiation is performed at dose levels necessary to achieve the intended technological function and, in accordance with good radiation/manufacturing practice;

- There are chemical changes in tropical fruits following irradiation (albeit limited) resulting in the formation of radiolytic products. However, these products are not always unique to irradiation and are also present following more traditional processing of food, namely, heat;

- As a form of food processing, irradiation will have some impacts on the nutrient status of tropical fruits; however, there are few indications that these impacts are any greater than other forms of food processing, especially for irradiation doses less than 10 kGy;

- The research indicates that carbohydrates, proteins, fatty acids, minerals and trace elements in tropical fruits undergo very minimal alteration during irradiation; although selected vitamins are effected following irradiation of tropical fruits;

- Overall, there are no toxicological concerns resulting from the formation of new radiolytic products following irradiation of tropical fruits. By virtue of the concept of chemiclearance and the past safety studies performed on fruits (including tropical fruits) irradiated food is considered equivalent to non-irradiated food or fruits that have been treated with more conventional treatment protocols (eg heating for quarantine purposes) with respect to safety, nutritional properties and wholesomeness.

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APPENDIX 1

Studies on Irradiated Fruits/Tropical Fruits

The following table is a concise summary of the range of studies that have been performed to evaluate the wholesomeness and safety of irradiated fruits in cell lines, animals and humans. A complete list of all studies undertaken on irradiated foods is available in the World Health Organization reports (1994 and 1999).

Genotoxicity studies

Species/Food	Type of Study	Duration	Dose (kGy)	Effects	References
Human lymphocyte cells/Strawberries	*In vitro* test for chromosomal aberrations	3-days	15 kGy	No mutagenicity observed	Schubert et al (1973)
Mouse /Strawberries at 5% in diet	*In vivo* for chromosomal aberrations	5-days	15 kGy	No mutagenicity observed	Schubert et al (1973)
Rat/Mangoes at 15% in diet	*In vivo* Dominant lethal study	112 days	0.8 kGy	No mutagenicity observed	Derse (1978)
Rat/Mangoes	Chromosomal aberration study	Varied	0.08 kGy	No mutagenicity observed	Derse (1979)

Animal Studies

Species/Food	% in the diet	Duration	Dose (kGy)	Effects	References
Rats					
Mangoes	At 15% in the diet	90 days	0.8 kGy	No adverse effects	Raltech Scientific Services (1979)
Strawberries	At 5% in the diet (powder and juice)	90-days	50 kGy	Decreased growth in male rats consuming powder form. No effects on females or on animals consuming strawberry juice.	Verschuuren, Van Esch and Kooy (1966)
Peaches or Strawberries	at 35% in the diet	8-12 weeks	Up to 60 kGy	Decrease in growth in rats consuming peaches. However, this was attributed to high sucrose levels.	Read, Kraybill and Witt (1958)
Mangoes	At 15% in the diet	2 years	0.8 kGy	No adverse effects observed	Raltech Scientific Services (1981)
Strawberries	Not stated in WHO (1994) Report	2 years	3 kGy	No adverse effects observed	Nees (1970)
Peaches	35% in the diet	2 years	56 kGy	No adverse effects observed	Bone (1963)
Fruit compote	at 35% in the diet	2 years or 4 generations	Up to 56 kGy	Longevity decreased in 4^{th} generation.	Mead and Griffith (1959)
Peaches	at 20% in the diet	2 years or 4 generations	Up to 56 kGy	Decreased weight gain in females of 4^{th} generation.	Read et al (1961)

Rats (contin.)					
Peaches	at 35% in the diet	2 years	Up to 56 kGy	No adverse effects	Tinsley, Bone and Bubl (1963)
Oranges	at 35% in the diet	2 years	Up to 56 kGy	No adverse effects	Phillips, Newcomb and Shankin (1961)
Mice					
Fruit compote	at 9% in the diet	1-2 years	Up to 56 kGy	No adverse effects	Radomski et al (1965)
Peaches	at 17% in the diet	2 years	Up to 56 kGy	No adverse effects	Calandra and Kay (1961)
Dogs					
Fruits (Cherries, apricots and prunes)	at 35% in the diet	90 days	4 kGy	No adverse effects	Gabriel and Edmonds (1977)
Fruit compote	at 35% in the diet	2 years	Up to 56 kGy	No adverse effects	Larson et al (1957)
Monkeys					
Peaches and whole oranges	at 35% in the diet	2 years	Up to 55.8 kGy	No adverse effects noted	Blood et al (1963)

Human studies

Food	Duration	Dose (kGy)	Effects	References
Thirty-five different kinds of irradiated foods-grains, beans, vegetable and fruits, meat, fish, eggs, poultry and flavourings 60% of diet	90 days	1-8 kGy	No adverse effects. No chromosomal abnormalities.	Shao and Feng 1988; Yang (1990).
Fifty four items of various foods	Periods of 15 days, separated by control diet and washout intervals	25-40 kGy	No toxic effects observed nor change in clinical parameter (including at follow up examinations at one-year post exposure)	Bierman (1958)
Canned pork	Two periods of 15 days separated by a 5 day washout interval	30 kGy	No adverse effects noted	Plough et al (1957)

The tables above summarise some of the available studies in animals and on humans, where a broad range of irradiated foods have been administered in the diet.

These animal and human studies have shown minimal adverse effects on the wholesomeness and subsequent safety of irradiated foods in animal and humans.

The studies on chemistry of irradiated fruits in conjunction with the specific safety studies on mangoes justify extrapolating the conclusions about safety and nutritional adequacy to all members of the fruit class, in particular, tropical fruits.

ATTACHMENT 3

DIETARY INTAKE ASSESSMENT REPORT

1. Dietary intake assessment

This application considers dosages up to 1 kGy, which as identified by the research outlined in Attachment 2, are unlikely to have significant impact on the nutritional profiles of the tropical fruits proposed to be irradiated. Nonetheless, the potential impact of losses of at-risk nutrients from irradiation of these tropical fruits has been considered within the context of total dietary intakes for the Australian and New Zealand populations. No population sub-groups in respect of age or gender have been identified for whom the selected tropical fruits were a major nutrient source. Therefore, the modelling has been conducted for the population as a whole.

FSANZ's dietary modelling computer program, DIAMOND, was used to estimate the total dietary intakes of β-carotene, folate, vitamin C and vitamin B_1 for Australian and New Zealand populations. Vitamin concentrations of foods in Australia and New Zealand, as contained in DIAMOND reference files, were derived from the databases that supported the most recent National Nutrition Surveys for Australia and New Zealand respectively. These surveys were the 1995 National Nutrition Survey (NNS) in Australia that surveyed 13,858 people aged 2 years and above; and the 1997 New Zealand NNS that surveyed 4,636 people aged 15 years and above. Both surveys utilised a 24-hour food recall methodology.

DIAMOND was also used to estimate the consumption of the selected tropical fruits (including the associated products where these foods are ingredients) in Australia and New Zealand.

1.1 Food consumption data

The consumption of the selected tropical fruits, raw only, and the selected tropical fruits, from raw and other sources (such as ingredients in mixed foods or as juices), were estimated separately using DIAMOND; the results are shown in Table 1. The estimated consumption figures are limited to the tropical fruits reported as consumed in each of the respective surveys. In the Australian 1995 NNS, carambola, custard apple, litchi, mango, papaya and rambutan were reported as consumed. In the New Zealand 1997 NNS, breadfruit, litchi, mango and papaya were reported as consumed. Longans and mangosteens were not reported as consumed and therefore, were unable to be considered.

Table 1. Consumption of selected tropical fruits as reported in Australia and New Zealand National Nutrition Surveys

Country	Tropical Fruit	Raw only		Raw + other sources	
		Number* of consumers (as % of respondents)	Mean consumption (g/day)	Number* of consumers (as % of respondents)	Mean consumption (g/day)
Australia	Carambola	2 (0.01)	50.2	2 (0.01)	50.2
	Custard apple	11 (0.1)	253.6	11 (0.1)	253.6
	Litchi	9 (0.1)	103.3	12 (0.1)	105.5
	Mango	137 (1.0)	192.5	344 (2.5)	178.7

Country	Tropical Fruit	Raw only			Raw + other sources		
		Number* of consumers (as % of respondents)		Mean consumption (g/day)	Number* of consumers (as % of respondents)		Mean consumption (g/day)
	Papaya	72	(0.5)	135.8	72	(0.5)	135.8
	Rambutan	4	(0.03)	24.4	4	(0.03)	24.4
New Zealand	Breadfruit	NC	-	-	3	(0.1)	668.6
	Litchi	NC	-	-	2	(0.04)	61.8
	Mango	7	(0.2)	283.3	11	(0.2)	234.8
	Papaya	5	(0.1)	102.5	6	(0.1)	91.6

* Consumers are those respondents to each NNS that reported consuming one or more of the tropical fruits in Table 1
NC = No consumption reported

Mango and papaya presented as the main fruits consumed from the 'selected tropical fruit' category, as recorded in the surveys. The number of consumers of raw mango represented 1% of all respondents to the Australian 1995 NNS and the number consuming both raw and other sources of mango represented 2.5%. The reported consumption of the selected tropical fruits overall was much smaller for the New Zealand population, with 0.2% of respondents to the New Zealand 1997 NNS reporting consuming mango in any form.

1.2. Estimated intakes of β-carotene, vitamin C, folate and vitamin B_1

The estimated intakes of β-carotene, folate, vitamin C and vitamin B_1 from the total diet for Australia and for New Zealand are shown in Table 2. Table 2 also shows the proportion of the RDI the estimated intakes represent. The vitamin intakes were calculated for each individual respondent in the survey based on the foods they consumed on the day of the nutrition survey, and the concentrations of the vitamins in these foods. The estimated vitamin intakes for each individual were compared to the specific Recommended Dietary Intake (RDI) for his/her age and gender. All individual RDI intakes were then ranked and statistics for the population (mean, and high percentiles) were derived. The estimated vitamin intakes are unadjusted, and do not account for intra-individual variation. A second 24-hour recall was conducted on a subset of both the NNS's respondents in order to allow for correction or adjustment for variation in nutrient intakes over longer periods of time. The use of unadjusted values is likely to have little impact on estimated mean intakes, but is likely to produce higher estimated 95th percentile intakes than if the adjustments were made (Rutishauser, 2000).

Table 2. Estimated intake of vitamin C, vitamin B_1, β-carotene and folate from the diets of Australia and New Zealand

Country	Vitamin		Estimated Intake	
			Mean	95th percentile
Australia				
	Vitamin C	mg/day	122	333
		x RDI^{+}	*3.63*	*9.95*
	Vitamin B1	mg/day	1.6	3.4
		x RDI	*1.82*	*3.64*
	B-carotene	µg/day	3326	10623
		x RDI (RE)*	*0.8*	*2.58*

Country	Vitamin		Estimated Intake	
			Mean	95th percentile
	Folate	μg/day	289	564
		x RDI	*1.08*	*2.46*
New Zealand				
	Vitamin C	mg/day	110	312
		x RDI	*3.27*	*9.09*
	Vitamin B1	mg/day	1.4	2.7
		x RDI	*1.57*	*2.89*
	B-carotene	μg/day	3517	11859
		x RDI (RE)*	*0.78*	*2.64*
	Folate	μg/day	243	460
		x RDI	*0.76*	*1.61*

*RE=retinol equivalents
+ Multiples of RDIs are weighted for age and gender

The RDI listed for β-carotene is derived from the RDI for vitamin A, as there is no separate RDI for β-carotene. β-carotene is converted to retinol at the average rate of 6 μg β-carotene = 1 μg retinol (NHMRC 1991). The RDIs for vitamin A are expressed as Retinol Equivalents (REs). Therefore, for the purposes of dietary modelling, the RDIs for vitamin A were multiplied by six and compared to the estimated intakes of β-carotene. The contribution of retinol to vitamin A is not taken into account.

The mean and 95th percentile level of intakes of vitamin C and vitamin B_1 for Australia and New Zealand for the surveyed populations of both countries each exceeded the RDI. The mean estimated β-carotene intakes for Australia and New Zealand, when expressed as a proportion of the Vitamin A RDI, were calculated at approximately 80% vitamin A RDI; however, β-carotene itself does not have an RDI and it is not expected that β-carotene alone would meet the equivalent RDI (RDI for total vitamin A activity) used in the dietary modelling. The estimated 95th percentile levels of β-carotene intake for both countries expressed as a proportion of the Vitamin A RDI was greater than 100%. The mean estimated dietary intakes of folate for Australian and New Zealand populations were approximately 100% and 80% of the RDI, respectively, with the 95th percentile level for each population exceeding the RDI.

Tables 3 to 6 given below indicate the percentage contribution of the vitamin intake from consumption of the selected tropical fruits to the mean total dietary intake of vitamin C, vitamin $B_{1,}$ β-carotene and folate respectively. The major contributors to the mean total dietary intake of each vitamin are also shown. Contribution by the tropical fruits subject to this application has been estimated by the summation of 'other fruit' and 'other tropical fruit' categories. This will, therefore, be an overestimate as these categories, particularly the 'other fruit' category, include fruits additional to the selected tropical fruits relevant to this application. The particular fruits included in the 'other fruit' and 'other tropical fruits' categories are listed at Appendix 1 to this Attachment.

Table 3. Percent contribution of high dietary contributors and tropical fruits to mean total vitamin C intake for Australia and for New Zealand

Country	Food	Percent contribution to mean dietary intake
Australia	Single fruit juices	21.8
	Potatoes	11.9
	Brassica vegetables	10.4
	Oranges	5.0
	Other fruit*	2.8
	Bananas	2.4
	Other tropical fruit*	1.0
	Pineapples	0.4
New Zealand	Fruit juices	11.9
	Cordials and fruit drinks	10.0
	Brassica vegetables	8.9
	Oranges	7.8
	Boiled and baked potatoes	6.0
	Other fruit*	4.4
	Banana	2.8
	Other tropical fruit*	1.0
	Pineapple	0.3

* See Appendix 1 for a list of the fruits contained in these categories in the dietary model

The contribution of 'other fruit' and 'other tropical fruit' to the estimated mean dietary intake of vitamin C is 3.8% for Australia and 5.4 % for New Zealand. The actual contribution of the selected tropical fruits will be smaller than the values reported above and, based on dietary modelling, these fruits do not appear to be major contributors to vitamin C intake from the diet.

Table 4. Percent contribution of high dietary contributors and tropical fruits to mean total vitamin B_1 intake for Australia and for New Zealand

Country	Food	Percent contribution to mean dietary intake
Australia	Breads, rolls, white	12.5
	Yeast, vegetable and meat extracts	10.3
	Breakfast cereal, wheat based biscuits and shredded wheat	4.9
	Breads, rolls, wholemeal	4.5
	Bananas	0.7
	Other fruit*	0.2
	Pineapples	0.1
	Other tropical fruit*	< 0.1
New Zealand	Bread and rolls, white	12.2
	Bread and rolls, wholemeal	9.0
	Bread and rolls, mixed grain	3.9
	Yeast and vegetable extracts	3.1
	Banana	0.9
	Other tropical fruit*	0.2
	Other fruit*	0.1
	Pineapple	0.1

* See Appendix 1 for a list of the fruits contained in these categories in the dietary model

The contribution of 'other fruit' and 'other tropical fruit' to the mean estimated dietary intake of vitamin B_1 is <0.5% for both Australian and New Zealand populations. The contribution of the selected tropical fruits to vitamin B1 intakes would therefore be relatively insignificant.

Table 5. Percent contribution of high dietary contributors and tropical fruits to mean total β-carotene intake for Australia and for New Zealand

Country	Food	Percent contribution to mean dietary intake
Australia	Carrot and similar root vegetables	45.9
	Pumpkin	10.2
	Vegetable based soup	3.9
	Tomato	3.1
	Other fruit*	1.7
	Other tropical fruit*	1.6
	Bananas	0.5
	Pineapples	< 0.1
New Zealand	Carrots	36.2
	Pumpkin/squash/butternut	11.6
	Leafy greens	8.3
	Carrots/peas/beans/corn mixes	4.2
	Stone fruit	3.9
	Other tropical fruit*	0.7
	Other fruit*	0.4
	Banana	0.3
	Pineapple	<0.1

* See Appendix 1 for a list of the fruits contained in these categories in the dietary model

The contribution of 'other fruit' and 'other tropical fruit' to the mean estimated dietary intake of β-carotene is 3.3 % for the Australian population and 1.1% for the New Zealand population. The contributions of the selected fruits relevant to this application will be lower than the levels reported above. The dietary modelling also assumes β-carotene has an RDI and does not take into account other sources of vitamin A from the diet. Based on dietary modelling the tropical fruits relevant to this application are not major contributors to dietary β-carotene and vitamin A intake.

Table 6. Percent contribution of high dietary contributors and tropical fruits to mean total folate intake for Australia and for New Zealand

Country	Food	Percent contribution to mean dietary intake
Australia	Potatoes	6.6
	White bread	5.2
	Breakfast cereal, wheat-based biscuits & shredded wheat†	4.4
	Cauliflower and similar brassica vegetables	4.1
	Bananas	1.1
	Other fruit*	0.2
	Other tropical fruit*	< 0.1
	Pineapples	< 0.1

New Zealand	White bread	5.4
	Tea	5.2
	Yeast and vegetable extracts	4.2
	Cauliflower and similar brassica vegetables	4.2
	Single cereal, puffed, flakes or extruded cereals†	3.9
	Banana	2.8
	Other fruit*	1.0
	Other tropical fruits*	0.2
	Pineapple	< 0.1

* See Appendix 1 for a list of the fruits contained in these categories in the dietary model
† Includes fortified breakfast cereals

In Table 6, 'other fruit' and 'other tropical fruit' contributed less than 0.3% for the Australian population and 1.2% for the New Zealand population to the mean estimated dietary intake of folate. The contributions of the selected tropical fruits relevant to this application will be smaller than the levels reported above, particularly for the 'other fruit' category. The contribution to of the selected tropical fruits to folate intakes will therefore be relatively minor.

If the worst-case scenario were assumed, that is, that the irradiation process completely destroyed all β-carotene, folate, vitamin C and vitamin B_1 in the selected tropical fruits, then the estimated mean intakes of β-carotene, folate, vitamin C and vitamin B_1 from the selected tropical fruits would be 0% rather than the approximate ranges between 0% and 5% as indicated above. Dietary modelling was conducted to estimate the total dietary intakes of each nutrient assuming irradiation had completely destroyed the nutrient content of the selected tropical fruits. The potential reductions in mean dietary nutrient intakes were 5% or less for β-carotene and vitamin C and 1% or less for vitamin B1 and folate for both the Australian and New Zealand populations. In the context of the total diet, and given that many of the alternate sources of these micronutrients are readily available to the Australian and New Zealand populations, it is considered that the nutritional impact would be negligible at the broader population level.

2. Regional considerations

It is recognised that the fruits in question are tropical and as such, may be consumed more frequently and in greater amounts by those population sub-groups residing in tropical areas. This relates in particular to Queensland and the Northern Territory of Australia. Consideration of relevant dietary intakes has been applied on a regional basis in order to consider this aspect further.

The following table (Table 7) identifies the contribution of the 'other tropical fruits' category, as the category representing most of the fruits in question, to intakes of β-carotene, folate, vitamin C and vitamin B_1 on a regional (i.e. state and territory) basis.

Table 7. Percent contribution of 'other tropical fruit' to mean total nutrient intake by State and Territory in Australia, and for New Zealand

State	Nutrient			
	Vitamin C	Vitamin B1	β-carotene	Folate
NSW	0.9	0.05	2.3	0.04
Victoria	0.4	0.02	0.8	0.02
Queensland	3.0	0.13	3.8	0.07
South Australia	0.2	0.13	0.5	0.01
Western Australia	0.4	0.02	0.8	0.01
Tasmania	0.3	0.003	0.04	0.001
Northern Territory	1.9	0.09	3.9	0.05
ACT	0.6	0.03	0.9	0.01
New Zealand	1.0	0.2	0.7	0.2

As can be seen in Table 7, the contribution of 'other tropical fruit' to the mean vitamin C and β-carotene intakes for Queensland and Northern territory populations are higher than for the other states and territories in Australia. New Zealand values have also been included in Table 7 for comparative purposes.

Dietary modelling indicates the contributions to total intake from the tropical fruits relevant to this application are still relatively small for Queensland and Northern Territory and the respective RDIs can be readily achieved through other food sources. It is not considered that the impact, even within these jurisdictions, would be sufficiently significant to warrant concern.

3. Limitations of the dietary intake assessment

A limitation of estimating habitual dietary nutrient intake associated with this dietary intake assessment is that only 24-hour dietary survey data were available. These data do not take into consideration the variation in nutrient intake over time by the same individual (intra-individual variation). Also, 24-hour data tend to overestimate habitual food consumption amounts for high consumers, and therefore may result in higher estimated nutrient intakes for this group. Thus, predicted high percentile nutrient intakes are likely to be greater than actual high percentile nutrient intakes over a lifetime.

A further limitation is the inability of the dietary intake assessment to clearly segregate the fruits in question from the other fruit categories. However, the assessment as conducted represents an over-estimate of the contribution of these fruits to total dietary intakes and as such, more accurate values would diminish rather than increase the significance of these fruits in the Australian and New Zealand diets.

4. Conclusions

The dietary intake assessment indicates that the selected tropical fruits proposed to be irradiated are minor contributors to the total dietary intakes of β-carotene, folate, vitamin C and vitamin B_1 when considered within the context of the overall diet.

Therefore it is concluded that any potential reductions-of β-carotene, folate, vitamin C and vitamin B_1 due to irradiation are unlikely to have a significant impact on dietary intakes of these vitamins by the Australian or New Zealand populations, even when considered on a regional basis.

Appendix 1

Table A1 Fruits included in the 'Other tropical fruit' and 'Other fruit' categories listed in Tables 3, 4, 5, 6 and 7.

Category	Fruits in category[+]	
	Australia	New Zealand
Other tropical fruit	CARAMBOLA	Guava
	CUSTARD APPLE	LITCHI
	Guava	MANGO
	Jackfruit	Passionfruit
	MANGO	PAPAYA (pawpaw)
	PAPAYA (pawpaw)	Watermelon
	Pepino	Rockmelon
	RAMBUTAN	Honeydew melon
	Tamarillo	Grapes
		Tamarillo
		Olives
Other fruit	Date	Feijoa
	Feijoa	Kiwifruit
	Fig	Persimmon
	Grape	Rhubarb
	Honeydew melon	Gooseberry
	Kiwifruit	Jackfruit
	Loquat	Pepino
	LITCHI	Babaco
	Passionfruit	BREADFRUIT
	Persimmon	Avocado
	Rhubarb	
	Rockmelon	
	Watermelon	

[+] Fruits appearing in CAPITAL letters are those that potentially are to be irradiated.

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ATTACHMENT 4

SUMMARY OF PUBLIC SUBMISSIONS (First Round)

Submitter	**Supports / Does not support**	**Details**
Queensland Department of Primary Industries	**Supports**	The Department supports the application based on the scientific evidence that the treatment is safe and efficacious and that there is a need for this technology to access new markets. This technology is approved and recognised as a treatment procedure for selected tropical fruits from Hawaii to the US mainland. This treatment is of particular importance to Queensland's tropical fruit industries to establish new markets.
Cairns Region Economic Development Corporation	**Supports**	High level of support for the application as it will open up critical export markets for North Queensland: 1. NZ Markets-mango, papaya, lychee and other fruits; 2. US market for lychee, rambutan, longan and other fruits; 3. Potential markets in north Asia; 4. Market opportunities for 10,000t/yr of tropical fruits worth A$50m.
Tableland Economic Development Corporation Inc	**Supports**	Expressed a very high level of support for irradiation of tropical fruits, as the current range of phytosanitary treatments available to farmers in North Queensland is expensive, inadequate or ineffective.
State Development Centre, Cairns	**Supports**	Irradiation appears to offer a sound solution to treating pests. Accessing a suitable technology to treat tropical fruits for export has been identified as a Regional Development Priority and a Regional Export Priority for Far North Queensland.
Queensland Fruit and Vegetable Growers	**Supports**	Irradiation has the potential to assist industry access export and domestic markets because of the ability to disinfest produce infected with fruit fly. QFVG trusts that FSANZ will ensure that the resulting food does not pose a risk to public health and safety or food that is nutritionally inadequate. QFVG emphasises that operators of irradiation facilities must adhere to adequate labelling and that the proponents of irradiation rigorously adhere to an open and transparent process to overcome barriers to acceptance of treated produce.
Rambutan and Tropical Exotic Growers Association	**Supports**	This will create export opportunities and has potential to make a huge difference to the viability of the industry.

Dr N Dasari, Horticulture, Northern Territory	**Supports**	Irradiation has the capacity to treat a range of horticultural and other food products and offers the opportunity to attract a phytosanitary treatment facility to the region thereby building the regions capacity to develop export markets. Also offers opportunities to harvest relatively mature fruit and transport without shelf life disadvantages. Will offer an alternative treatment for some fruits intolerant of vapour heat or hot water dipping and include an ability to treat packed boxes of fruit leading to reduced cross contamination of pests and diseases. Provided the fruit is labelled there are benefits to consumers in terms of seasonal spread, quality, flavour and diversity of product. Costs are restricted to the industry in terms of labelling, treatment costs and market development. Industry must assess the risk of consumer reaction, both negative and positive and make an investment decision accordingly. Stated that the benefits to consumers (to avoid irradiated foods) of Option 1 (Not to permit irradiation of tropical fruits) is incorrect as consumers will be forced to avoid irradiated fruit under this option as irradiation would not be available.
Food Technology Association of Victoria Inc	**Supports**	Suggested that the labelling issue should be thoroughly considered, as there appears to be uncertainty as to how unpackaged, individually displayed fruit would be designated as being irradiated. Suggested that sticky labels could be utilised. Stated that mandatory labelling regarding information to be displayed at point of sale is historically ignored and not policed. An alternative approach to irradiation is that an attempt be made to harmonise the range of phytosanitary treatments that are permitted in Australia but do not meet New Zealand Quarantine requirements.
Advance Cairns Limited	**Supports**	Has the potential to generate a significant increase in production of tropical fruits in the Cairns region, establish a food production plant and increase exports through the Cairns International Airport.
Cairns City Council	**Supports**	This will allow increased production of tropical fruits in the Cairns region and increased export earnings for Australia.
Cairns Port Authority	**Supports**	Has the potential to generate a significant increase in production of tropical fruits in the Cairns region, establish a food production plant and increase exports through the Cairns International Airport.
Australian Horticultural	**Supports**	

Exporters' Association		
International Consultative Group on Food Irradiation	**Supports**	Based on the principle of chemi-clearance ICGFI would urge FSANZ to approve fruits as a class without being specific to individual items. This would allow other fruits grown in Australia to be treated with irradiation for phytosanitary purposes. Endorses the max dose of 1 kGy; however suggested that a minimum dose of 150 Gy and 300 Gy is sufficient to ensure quarantine protection against fruit fly and other insect species respectively. Irradiation is an efficacious treatment for fresh horticultural commodities. With the exception of methyl bromide fumigation, irradiation costs less than other physical treatments
Australian Mango Industry Association Ltd	**Supports**	This application will be an important step in securing acceptance of irradiation as a phytosanitary treatment in other key markets. Irradiation is an effective and viable phytosanitary disinfestation treatment for Australian exporters.
Department of Agriculture, Fisheries and Forestry Australia	**Supports**	Irradiation will provide governments with an additional quarantine control option and the additional affect of providing a non-quarantine control option to achieve public health and safety, and provide industry with an effective safe technology.
Ministry of Health New Zealand	**Supports**	No particular concerns at this stage.
Danila B Oder-Stop Food Irradiation Co-ordinator	**Does not support**	An extensive submission was submitted which covered three main aspects: 1. Details of the US approval of food irradiation, including expected problematical developments for the USA and Australia/New Zealand; 2.A description of unintended consequences of approval; and 3. The difficulties with adequate labelling for consumers.
Suzi Tooke	**Does not support**	Concerned over the health effects caused by consumption of food exposed to ionising irradiation. The cumulative health effects of numerous food applications are not considered by FSANZ. The case-by-case approach suggested by FSANZ and Ministers is misleading as any irradiation facility can irradiate food (including using Cobalt 60). This will lead to Surebeam establishing an irradiation plant and could lead to further expansion of existing nuclear irradiation facilities. FSANZ has been inadequate in informing consumers about food irradiation.

		Concerned that fruits will not be adequately labelled for consumers. Also, the labelling should include the negative effects as well. FSANZ and ANZFSC ignored each and every study unfavourable to food irradiation. There has been no market research to determine the negative impact on Australian farmers, nor any public information programme. FSANZ should reject the application on the basis that the technology is unsafe, unhealthy and should not be swayed into accepting food irradiation because of international trading obligations.
Ian and Lexie Gray	**Does not support**	Food Irradiation is something we do not need
Form Letter from Zenith Design (No Name listed) Sonja Perrone Heidi Muller Fred Muiler Bruce Henry Hetty Thomas Brigitte Goerres Bruno Goerres R Wester M Lester Drew Jones Anna Barnes Mathew Smith Helen Maitland Kerry Scanlan MAK Williams Danielle Burette Grant Young	**Does not support**	Concerned over the health effects of the consumption of irradiated foods and that approval will allow food to be treated with ionising radiation from a highly radioactive material, namely, cobalt 60. The majority of concerns raised in this submission were covered in the submissions by Suzi Tooke and Danila B Oder. In addition, this form letter stated that Surebeam (USA) had misled the public over labelling of irradiated food by referring to 'electronic pasteurisation' rather than irradiated foods.
Janet Ablitt	**Does not support**	Irradiation is dangerous, relatively new and untried. Option 1 not to irradiate food is the only option.
Bettina Quatacker	**Does not support**	Food irradiation is unsafe for consumers; The location of the proposed Surebeam facility was not detailed for public information. Requested FSANZ to publish this location on its website. Tropical fruits would be irradiated at Narangba in Queensland. The proposed Steritech nuclear radiation facility (at Narangba) is too close to residential areas, which may increase the risk to public health and safety. There are no plans to monitor radiation levels in the area to protect resident's health. Other concerns raised in this submission were covered in the submissions by Suzi Tooke and Danila B Oder.

National Council of Women of Australia	**Does not support**	It is disappointing to find yet another application has been received to irradiated food-an entirely unnecessary process. Questioned NZMAF with respect to why if not all the alternative treatments are acceptable to other countries (including Australia) is it not acceptable to New Zealand? Does not believe that there is justification for the use of irradiation when other methods are available. Labelling of unpackaged foods such as tropical fruits will not be adhered too. Seeks clarification of doses expected to be used. Overall supports Option 1, not to permit irradiation of tropical fruits and rely on existing methods for phytosanitary purposes. Additionally, NZMAF should re-consider its requirements and to ascertain from NZ consumers whether they want irradiated foods.
BJ Turner	**Does not support**	Irradiation does not kill micro-organisms, can mask dirty processing and handling methods, leads to significant loss of vitamins and nutrients and there is a risk to health from eating irradiated foods due to increased carcinogens, new and dangerous unique radiolytic products. Other methods should be investigated other than irradiation. The precautionary principle should apply to food irradiation.
Peter Milton	**Does not support**	Was amazed to find that the Australian Government has permitted the consideration of applications to irradiate food based on the findings of a preliminary WHO (1992) report. FSANZ should not consider that irradiation from x rays or e beams and gamma rays are identical as x rays are far less intense and penetrating and dangerous to food products. Until there is a reliable testing method for irradiated food, irradiation should not be approved. FSANZ does not appear to be giving the submissions relating to the loss of nutrition and the lack of food safety the rigorous attention they deserve.
Brenda Lewis	**Does not support**	Raised safety and nutritional concerns over irradiated foods.

People Against Food Irradiation (Sydney)	**Does not support**	Wish to protest against the lack of time to comment on this application and the undue haste of the Surebeam application following the previous irradiation application (A413). Questions why FSANZ would approve the use of gamma rays to treat fruits when Surebeam is applying for use of e-beam/x-rays? The safety of e-beam/x-ray is seriously questioned in its proposed use on tropical fruit and the workers operating the equipment. Are the Australian tropical fruits producers aware of this application, what effects on food e-beam/x-rays may have and do they want this technology over present methods? Additionally, is there a market for producers and is it financially viable for them? Cited alternative techniques that may be used; namely, carbon dioxide/nitrogen blasting, sonar detection, and biological controls (disease/insect resistant plants). Request that FSANZ approach the CSIRO and Department of Primary Industries to ask for information on fruit developed by these two organizations which have been bred to be insect resistant. Provided references on Mangoes and Papaya's which suggest that irradiation is not a suitable process for these fruits (e.g. mangoes fail to ripen, colour spotting occurs on the skin, pores turn black and mottled browning of the skin occurs).
Public Citizen	**Does not support**	Opposes the application on the basis of the failure to protect public health and safety of consumers (irradiated food is unsafe), Surebeam's failure to uphold standards of honest, trustworthy conduct and to provide adequate and accurate information about its products and the failure to meet a technological need that benefits consumers, industry and government.
Federated Association of Australian Housewives	**Does not support**	E-beam/x-ray sources were not recommended by the House of representatives Standing Committee Enquiry (1989) Report. Irradiated foods are not safe, nutritious and irradiation facilities malfunction and kill people. Stated that enough time was not given to prepare a detailed submission.

Action for Environment (New Zealand)	**Does not support**	Irradiating tropical fruits will not be in the best interests of New Zealand consumers. The irradiation process will affect the appearance of the fruits and will deplete the vitamin content. As the irradiation process does not kill fruit flies but rather sterilises them, there is a real possibility that there may be surviving larvae. This could be disastrous for New Zealand's horticulture industry.
Form letter (2) Nimbin Organic's Judy Canales Hemp Party People of Nimbin Nimbin Hot Bread Kitchen Nimbin Village Meats Happy High Herbs Nimbin Newsagency and General Store	**Does not support**	Insufficient public information has been supplied, and the five-week comment period is insufficient for members of the general public to research, evaluate and respond to the Initial Assessment report. Opposed to the term 'electronic pasteurisation' to replace irradiation. Requires clarification of this term. Questions the standards of an organization that finds it acceptable to administer large doses of irradiation yet finds it unacceptable to use existing treatments such as heat or cold treatments. Raised the issue of previous safety studies, in particular, studies that showed that irradiated food is unsafe, particularly over a long-term period. Other concerns raised in this submission were covered in the submissions by Suzi Tooke and Danila B Oder.
Friends of the Earth (New Zealand)	**Does not support**	1. Inadequate information has been provided by the applicant with respect to energy levels of the e-beams and x-rays and how the fruit would be packaged or presented to the irradiation beams. This suggests that the efficacy of using such beams on thicker unevenly shaped produce such as tropical fruits is doubtful. How will the applicant ensure that all surfaces and the inner flesh of the fruits receive an irradiation dose exceeding the minimum required to sterilise ALL fruit fly larvae. 2. The applicant has only supplied a maximum dose, which at 1 kGy is higher than some tropical fruits can tolerate. 3. The claims that NZMAF will not accept tropical fruits from Australia are false. 4. There has been inadequate notification and consultation with stakeholder groups. 5. There are intrinsic problems in the use of irradiation as a treatment on tropical fruits. Cited the paper by Carpenter and Baker, 1987 which expressed this.

		6. NZ would be solely reliant on a Queensland certificate that claimed that produce had been properly irradiated. This would lower NZ quarantine protection measures and would greatly increase the likelihood of fruit fly outbreaks in NZ, lead to environmental concerns (as it would require widespread aerial spraying of insecticides), Key NZ producer groups should be consulted further. Support option 1 not to irradiate tropical fruits.
Mark Loveridge	**Does not support**	Not happy with FSANZ's approval of food irradiation due to safety concerns, no benefits to consumers, industry and governments, international trade should be scaled down not increased, irradiation will destroy the 'life-force' of food and there is not a final assessment report to review.
Canberra Consumer (CC) 2 submissions (31 October 2001 and 13 November 2001)	**Not specifically stated**	Insufficient information has been provided in the application to be able to make detailed comments. CC attached a copy of a paper by Carpenter and Baker (1987) of the NZ Ministry of Health titled: 'The place of irradiation for insect control on fresh produce entering or leaving New Zealand'. CC supports this paper and conclusions. No information has been provided on what insects are to be targeted and at what dose. Many tropical fruits are sensitive to irradiation damage below 1 kGy. CC provided a copy of a comparison of maximum tolerable doses and minimum dose required for desirable technical effects on fruits and vegetables. Supplied a reference on Kensington Pride Mangoes (the main variety grown in Australia) that they are damaged by radiation doses of 100 Gy (0.1 kGy). Therefore, published overseas data may not be applicable to fruits grown in Australia. The concept of equivalence does not apply to different varieties of the same fruit. It is necessary for Surebeam to provide data on the necessary radiation dose for the different insects, and the effects of that dose on the Australian varieties of the fruits to be irradiated. CC is opposed to the use of gamma rays, as they are unsuitable for use at low levels. It is essential that the irradiation procedures be HACCP compliant. Since the submission of 31 October 2001, CC has obtained a statement from the Queensland department of Primary Industries Web Site that the papaya fruit has been eradicated in Queensland. This means that there is no technological need to irradiate papayas as a quarantine measure.

Environmental Health Branch, South Australia	**Not specifically stated**	To ensure that this application fulfils a technological need, information from the New Zealand import authority and Biosafety Australia indicating that the proposed treatment will satisfy quarantine requirements should be provided.
Queensland Health	**Not specifically stated**	Why in Attachment 1 of the Initial Assessment report under the heading 'Guava' is some countries missing (Russian Federation, Turkey, United Kingdom and USA). What does ** mean in Attachment 1. It should be noted that most irradiation treatments for phytosanitary purposes do not kill pests but rather prevent their emergence or cause sterility. The suitability of packaging material would need to be considered for use when food is irradiated.
The National Organisations for Fruit and Vegetable Growers (New Zealand)	**Not specifically stated**	Why is the application before FSANZ, and not directly before NZMAF? What are the issues that require it to be dealt with by FSANZ? Are the industries such as ours being consulted (they do not appear to be?

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SUMMARY OF PUBLIC SUBMISSIONS (Second Round)

For a list of submitters for the second round of consultation refer to Appendix 1.

691 were received

675 submissions	**Opposed** - does not recognise any circumstances under which food irradiation of tropical fruits should be undertaken. Also, included people opposed to the overall process of irradiation.
16 submissions	**Support** - considers the technology has been demonstrated to be safe and potentially beneficial and should therefore be permitted.

Reasons identified for not supporting the Application

The overall majority of submissions received were opposed to food irradiation, either in general or specifically the irradiation of tropical fruits.

1. Opposed to food irradiation in **general**, as there are alternatives to its use which have not been explored by FSANZ or due to the following reasons:

- FSANZ has failed to perform its duty and protect the public, provide adequate information for informed choices and has preferred the interests of industry.
- *FSANZ is opening the floodgates for other irradiation companies to make applications for more food items*
- *FSANZ has provided little awareness and information to the Australian and New Zealand public on irradiated food.*
- Labelling issues need to be addressed and enforced in light of the sale of irradiated herbal teas in Victoria, which are not being labelled.
- Accurate labelling, management of doses and inspection of such processes (particularly for imported food) will be beyond Australia's capability to enforce.
- Opposed on the grounds of long-term safety which has not been proven, and the effects socially and economically on health are unknown.
- The Draft Assessment report was superficial, defective, incomplete and evasive.
- The Applicant's request to use radiation generated by electricity has been distorted to include the use of cobalt 60.

2. Opposed to the Irradiation of tropical fruit based on the lack of safety of the treatment and decreases in nutritional value of food:

- 2-dodecyclobutanone (2-DCB) a unique chemical produced following irradiation of food causes significant DNA damage.

- There are also concerns that irradiation will increase the levels of mutagens and carcinogens in food.

- Irradiation destroys vitamins A, B, C, E and K and other nutrients. Food irradiation produces other toxins in food such as benzene and formaldehyde.

3. Irradiation is not effective in killing insects and extending shelf life of fruit and destroys the quality of the fruit. Cold treatment is an alternative for quarantine purposes and is safer and cheaper.

- Alternatives have not been fully explored and we request FSANZ to request appropriate bodies to carry out research on other suitable technologies that are less controversial and environmentally friendly.

4. Opposed to the establishment of irradiation facilities in Queensland and elsewhere in Australia due to concerns over closeness to schools, homes, businesses and the possibility of accidents.

- If the application is approved, food will also be able to be irradiated with cobalt 60 isotope sources at the proposed irradiation plant in Narangba (Steritech Pty Ltd).

- FSANZ gave approval for use of Cobalt 60 even though this source had not been requested in the application

5. The Application cannot be considered by FSANZ until MAFNZ has approved the irradiation of tropical fruit as a biosecurity treatment. If MAFNZ approval is not granted then there is no technological need and any approval given by FSANZ will be in breech of its own standard.

One submission in particular, presented detailed arguments that the following had been ignored, omitted or inadequately examined by FSANZ: 1. Public liability indemnity ignored; 2. National security ignored; 3. Labelling and signage of product superficially examined; 4. International Radura symbol should have been recommended; 5. Danger of fruit fly mutation inadequately researched; 6. Equipment and process not subjected to expert examination; 7. European state of progress and knowledge ignored; 8. Financial and legal statue of the applicant overlooked; 9. Procedures for inspection, regulation and policing inadequately examined; 10. Proof of technological need superficial; 11. Empirical evidence of illness by US Postal Workers and others ignored; 12. Extended season claims accepted without sufficient appraisal; 13. Costs and benefits are not quantified; 14. Overseas trade impact is beyond authority competence; 14. Irradiated imports to be permitted from Australian approved facilities only; 15. Prior chemical treatments to improve irradiated outcomes overlooked.

Comments in support of the Application

From: Environmental Health Branch, Department of Human Services (South Australia), Environmental Health Section (Northern Territory Government), New Zealand Fresh Produce Importers Association Inc., The Australian Food and Grocery Council, Steritech Pty Ltd, The New Zealand Food Safety Authority (NZFSA), Queensland Government (State Development Centre Cairns), Environmental Health Unit (Queensland Health), Australian Tropical Foods, Pedro O'Connor (Centre for Wet Tropics Agriculture), Charles C Brittain (Top Crop Lychee), Joe Moro (President Mareeba District Fruit and Vegetable Growers Association), SureBeam Corporation, Food Technology Association of Victoria Inc, Western Australian Food Advisory Committee, Department of Agriculture Fisheries and Forestry,

Summary of comments:

- The approval and implementation of irradiation as a treatment option for quarantine pests will strengthen New Zealand's overall biosecurity protection.

- From an occupational perspective the benefits of irradiation are clearly demonstrated;

- Irradiation treatment would be the most likely process for quarantine purposes in order to gain access to international markets for tropical fruits growers.

- The future replacement of methyl bromide, which is currently used in large volumes, will be good for the environment.

- Approval for irradiation of lychees would open up markets in New Zealand, USA, Taiwan and Japan and provide a much-needed boost to the small business sector in the region of Far North Queensland.

- Irradiation will allow access to export markets and create additional jobs for the Tablelands area of North Queensland

- Irradiation is a proven technology that is efficacious, safe and cost effective and is rapidly becoming the treatment of choice, particularly for tropical fruits.

- Provided there is a technological need and the process does not compromise the safety and nutritional adequacy of the fruits the Application is supported.

- There was a discrepancy between dosages quoted in the Draft Assessment report of 0.15-0.25 kGy overseas to that proposed as a maximum dose (1 kGy).

- E-beam and X-ray as a phytosanitary measure is seen as a preferred alternative to conventional techniques such as ethylene oxide and methyl bromide.

- It is essential to have an appropriate method for detection of irradiated fruits before the Application is approved.

- There was support for a national education and information framework on irradiated foods involving industry, Commonwealth and State/Territories.

- The nutritional assessment is based on the National Nutrition Survey of 1995, whereas consumption of many tropical fruits is seasonal. As such, the dietary importance of these tropical fruits can be much higher than estimated in the assessment, particularly, when mangoes are in season.

- The thrust of the application is to provide greater opportunities for sub-tropical fruits to be available in New Zealand. Therefore, consumption among Pacific Island communities is likely to rise above present levels, which are naturally depressed by a lack of availability. The data of Attachment 3 is of high quality and extensive. It should be used further to assess more fully the potential impact on Pacific Island communities.

- Chemiclearance is stated to be based on 'precise chemistry'. It is, however, based on sophisticated chemical analysis, but this is followed by extrapolation via general considerations of chemical structure and general reactions of homologues. Attachments 2 and 7 describe chemiclearance adequately, but S5.4 can only justify a term such as 'general chemistry'.

ATTACHMENT 5

GENERAL ISSUES RAISED IN PUBLIC SUBMISSIONS

This attachment provides a list of the issues or questions raised by the public submissions in response to the Initial Assessment report that was published in relation to this application. The issues or questions raised are in bold under broad headings, with responses or further information provided underneath each issue. The major issues raised are also covered in the main body of the draft assessment report, and **Attachments 2 and 3**.

GENERAL

Why is the application before FSANZ, and not directly before the Ministry of Agriculture and Forestry, New Zealand (NZMAF)?

The Applicant made a specific application to FSANZ to amend the *Food Standards Code*. FSANZ has a responsibility to progress all applications that are accepted for initial assessment (referred to as Preliminary Assessment under Section 13 of the FSANZ Act) under its statutory timeframes.

However, approval for the use of irradiation as an alternative treatment for quarantine purposes in the *Food Standards Code* does not automatically mean that approval will be granted for this process under the quarantine provisions in either Australia or New Zealand.

Firstly, the use of food irradiation on the proposed tropical fruits must be approved by the Board of FSANZ based on food safety, nutritional adequacy, a recognised technological need and other considerations under the FSANZ Act 1991. The Australia and New Zealand Food Regulation Ministerial Council (ANZFRMC) is then notified of this approval, and may request it be reviewed; or it may ultimately reject or amend the approved variations to Standards. An amendment of the *Food Standards Code* via this process is necessary to allow lawful sale of irradiated food on the market in Australia and New Zealand. Secondly, the relevant Australian and New Zealand quarantine agencies must then assess the appropriateness of the irradiation treatment for the specific pests of quarantine concern and determine an appropriate dose (within the minimum and maximum range specified in the draft standard) for the individual tropical fruits/pest on a case-by-case basis.

Insufficient public information has been supplied, and the five-week comment period is insufficient for members of the general public to research, evaluate and respond to the Initial Assessment report.

FSANZ operates under a strict statutory timeframe of 1 year from the commencement of an application until a final recommendation is made to the FSANZ Board. It is acknowledged that this limits the amount of time for public consultation that can be undertaken. However, with this application a Steering Group representing many stakeholders (Consumers, Industry and Government) is advising FSANZ on many of the issues raised from the first comment period. These stakeholders may disseminate information on irradiation provided by FSANZ when they can.

FSANZ disseminated as much information as was available at the time of preparation of the Initial Assessment Report. Since then more information has been provided and researched by FSANZ as detailed in the Draft and Final Assessment Report.

The House of Representatives (HOR) Standing Committee Enquiry Report (1989) did not recommend e-beam/X-ray sources of irradiation.

This relates to recommendation 13 of the HOR Report:

The Minister for Community Services and Health discuss with State and Territory Health Ministers the prohibition of the use of electron beam or x-ray machines for use in mobile commercial irradiation facilities until suitable operating techniques have been developed and problems relating to regulation and safety have been resolved.

Therefore, this relates to mobile facilities not to permanently based facilities. In addition, Health Ministers approved the use of e-beam and x-ray sources of irradiation in 1999 as safe and viable sources of irradiation.

Why is FSANZ approving the use of gamma rays when the application is for the use of irradiation by electron beam machines or x-rays?

Standard 1.5.3-Food Irradiation allow the use of gamma rays from the radionuclide cobalt 60 or from x-rays generated by or from machine sources operated at an energy level not exceeding 5 mega-electronvolts; or electrons generated by or from machine sources operated at an energy level not exceeding 10 mega-electronvolts. The Ministerial Council approved these sources of radiation for use on food on 2 September 1999.

Based on the principle of chemi-clearance the International Consultative Group on Food Irradiation (ICGFI) would urge FSANZ to approving fruits as a class without being specific to individual items. This would allow other fruits grown in Australia to be treated with irradiation for phytosanitary purposes.

The overall basis and intent of Standard 1.5.3 - Irradiation of Food, is to allow applications to be made to FSANZ on a case-by-case basis. Health Ministers agreed to this, as an appropriate approach in 1999 and any departure from this would require a specific application to change Standard 1.5.3.

The case-by-case approach suggested by FSANZ and Ministers is misleading as any irradiation facility can irradiate food (including using Cobalt 60)?

The case-by-case approach applies to requiring applications for individual foods to be irradiated and is not specific for the source of irradiation used on those foods. Any appropriate facility could undertake irradiation of food. However, such food could not be lawfully sold on the Australian or New Zealand markets unless listed in Standard 1.5.3 and labelled in accordance with those Standards.

FSANZ has been inadequate in informing consumers about food irradiation?

FSANZ will undertake communication activities to assist consumers, industry and governments to access information about any approval, the process of assessing the application, the outcomes of the scientific assessment of the application and other factual information about food irradiation relevant to the application.

There has been no market research to determine the negative impact on Australian farmers, nor any public information programme.

Irradiation is a new technology for Australian and New Zealand industry and consumers and it is appropriate that governments, industry and consumer organizations play a critical role in dissemination of information on this technology.

The Applicant has provided FSANZ with a copy of a document titled: 'Perceptions of food irradiation in New Zealand and Australia' by Roger Harker et al, HortResearch (2001). This report was sent to members of FSANZ's Steering Group and could be used to assist with information to all key stakeholders.

In this report consumer opinions were explored before and after the viewing of a video on irradiated foods using a focus group approach in which a moderator directed the flow of the discussion and in a series of questionnaires. Industry opinion was solicited in a series of interviews with Australian and New Zealand companies. The Executive Summary is at Attachment 8 to the Final Assessment Report.

A further discussion on this issue is in the main body of the Final Assessment Report.

The European state of progress and knowledge was ignored by FSANZ. FSANZ should not progress the application until such time that the countries in the European Union have established a clear position on food irradiation.

FSANZ maintains a constant watch and progress on approvals for food irradiation in other countries not just European countries. In addition, any matters related to the safety of food irradiation are closely monitored. For example, FSANZ's conclusions on the possible unique radiolytic product 2-DCB (refer to **Attachment 2,** Science Report section 4.4) were recently confirmed in a statement from the European Commission's Scientific Committee on Food (3 July 2002).

FSANZ also notes that in 1986, 1992 and 1998 the Scientific Committee on Food of the EU expressed favourable opinions on irradiation of fruit.

Hence, the United Kingdom does permit the use of irradiation on fruit (including fungi, tomato and rhubarb) under the Food (Control of Irradiation) Regulations 1990 at a maximum dose of 2 kGy. Additionally, dried fruits are permitted to be irradiated in France and the Netherlands at a maximum dose of 1 kGy under the EC Directives in which individual Member States approve treatment of selected foods with ionising radiation.

Therefore, the proposed maximum dose of 1 kGy for the tropical fruits proposed to be irradiated is consistent with the EC directive for France and the Netherlands with respect to maximum dose levels for fruits and the UK regulations which allows a higher dose of 2 kGy for fruits as a class.

Conclusion-FSANZ is an independent organization and makes its assessment based on the available evidence under its statutory requirements (noting and considering other international regulations as detailed above) but is not bound to incorporate or emulate the regulations of any particular regulatory authority.

Reference to IPHRWG

- It appears that the Interstate Plant Health Regulation Working Group (IPHRWG) has been omitted from some areas of the Draft Assessment Report where reference to quarantine agencies in Australia and New Zealand has been made. This should be corrected.

Evaluation

The IPHRWG consists of Chief plant quarantine officials of the States and Territories of Australia.

Outcome-FSANZ recognises that the IPHRWG represent quarantine interests and has included reference to them in the Final Assessment report in sections where they were previously omitted.

SAFETY

Irradiated foods are unsafe as a result of unique chemicals formed and there are limited long-term studies performed.

Although FSANZ recognises that many consumers have fears about consumption of irradiated foods, which were repeatedly expressed in public submissions, food irradiation is a thoroughly investigated food processing technology, with a large number of toxicological studies having been undertaken. These include many long-term studies that specifically address any evidence of long-term effects in animals. The data derived from animal studies are especially relevant to humans because of the composite nature of the food material used and the manner in which the diets were administered.

Animal and human feeding studies have not been conducted on every possible food. However, studies on a wide range of foods have established that foods of similar class and composition react similarly following irradiation. This concept is termed chemi-clearance and is described below.

The long-term animal feeding studies on irradiated food are supported by more limited toleration studies in humans. These include studies of up to 90-day duration with thirty-five different varieties of irradiated foods. Irradiated foods have been consumed in many countries, in particular, herbs and spices and fruits, for some time now without any known adverse health effects. In addition, some hospital patients have consumed irradiated food and the health of these patients has been monitored for clinical reasons.

Over thirty years of research have shown that virtually all the radiolytic products (i.e. chemical compounds that originate from a food following irradiation) that have previously been found in irradiated foods are either naturally present in food or produced in thermally processed foods. All reliable scientific evidence, based on animal feeding tests and consumption by humans, has indicated that these products pose no risk to humans (**Attachment 2**).

What is Chemiclearance?

Chemiclearance is a concept devised by past international Expert Committees[10] (JECFI, 1981; reviewed in WHO, 1994; 1999) on food irradiation, and refers to the clearance and ultimately approval of an irradiated food of a particular class for human consumption, based on the general chemistry of products that are produced following irradiation of that class (these are referred to as radiolytic products). Therefore, foods that are similar in their chemical makeup to others which have already previously undergone an extensive safety evaluation can be approved for food use without the necessity to undertake a further safety evaluation.

For a more detailed scientific description of chemiclearance refer to the Science Report (**Attachment 2**). An FSANZ information sheet explains in more detail this concept (**Attachment 7**).

FSANZ and ANZFSC ignored each and every study unfavourable to food irradiation.

The Australian Government should not permit consideration of applications to irradiate food based on the findings of a preliminary WHO (1992) Report.

FSANZ noted that the various international expert group's employed in the past to review all the available toxicological studies evaluated these contrary findings and the discrepancies or inadequacies in some of the toxicological data.

As a result of some of the unresolved concerns in relation to the safety data, the Australian government in 1990 requested the WHO to prepare a report on the safety and nutritional adequacy of irradiated foods. A preliminary report was compiled in 1992.

The WHO completed a final report in 1994. This was further refinement and review of the provisional report, taking into account comments of observers from the National Food Authority of Australia and the International Organization of Consumer Unions. The WHO (1994) report also discussed the contrary studies. In addition, the USFDA (1986) decision on irradiated foods also discusses the contrary studies. The USFDA reviewed over 400 studies of which 250 were 'accepted' or 'accepted with reservation', 150 were rejected and 20 review articles were not categorised (WHO, 1999). A publication by Diehl (1995) also devotes a special section on previous toxicological studies that have raised concerns.

Therefore, FSANZ is aware that there were previous contrary findings that are not specifically cited in the FSANZ safety assessment as previous expert committees had considered all of the available data.

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[10] References cited can be found in the Science Report (Attachment 2)

FSANZ concurs with the conclusions of the WHO (1994) and more recently the WHO's (1999) evaluation of the safety of irradiated foods. FSANZ concludes that it is a safe and alternative technique for disinfestation (Application A443) of selected foods.

The suitability of packaging material would need to be considered for use when food is irradiated and possibly approved for use when food is to be irradiated.

Food to be processed by irradiation, and the packages and packing materials used or intended for use in connection with food so processed, must be of suitable quality and in an acceptable hygienic condition, appropriate for the purpose of such processing. These should also be handled before and after irradiation, according to good manufacturing practice, taking into account, in each case, the particular requirements of the technology of the process.

Various types of packaging materials have been approved overseas for use when food is irradiated. Their suitability for irradiation has been studied in Canada, the United Kingdom and the USA.

There is also an extensive body of work in relation to the packaging materials for use with irradiated foods and an American Society of Testing Methods (ASTM) Standard Guide for Packaging Materials for Foods to be Irradiated (1995).

It is the responsibility of Australian and New Zealand food manufacturers and retailers to ensure that their products are safe and that they comply with all relevant legislation.

This issue is further addressed more detail in the main body of the Final Assessment Report.

TECHNOLOGICAL NEED

Is there a technological need for the irradiation of Tropical Fruits?

FSANZ requested advice (via the Applicant) from Biosecurity Australia (BA), the Ministry Agriculture and Forestry New Zealand (MAFNZ) and the Interstate Plant Health Regulation Working Group (IPHRWG) indicating that these quarantine bodies have considered the issue of irradiation treatment for the specified pest/tropical fruit commodities identified in the application. In particular, the maximum dose of 1 kGy will be an appropriate and efficacious dose for the technological need of treatment of quarantine pests. These responses were taken into account and in addition the relevant quarantine authorities were consulted when assessing the merits of the application.

It was concluded by the relevant quarantine agencies that irradiation of tropical fruits would provide an alternative to current disinfestation methods and that the proposed maximum dose of 1 kGy will provide sufficient scope as a treatment for country/crop/pest combinations.

A number of submissions raised the following points (below in italics) in relation to this issue. FSANZ sought advice on these issues from BA, MAFNZ and other regulatory agencies involved in quarantine regulation (eg Queensland Department of Primary Industry).

- *The claims that NZMAF will not accept tropical fruits from Australia are false.*

MAFNZ will not accept fruit fly host products from Australia unless they have been treated to ensure freedom from fruit flies and other pests. Quarantine requirements for imports to New Zealand are a matter for determination by MAFNZ. For the fruits specified in the application irradiation treatment is a possible way of achieving such disinfestations. In some situations irradiation may be the only practical and economic treatment available.

The current application does not address quarantine considerations but examines whether irradiation meets a technological need and is acceptable under the terms of the *Food Standards Code.*

- *MAFNZ were questioned with respect to why if not all the alternative treatments are acceptable to other countries (including Australia) why is it not acceptable to New Zealand?*

- *An alternative approach to irradiation is that an attempt be made to harmonise the range of phytosanitary treatments that are permitted in Australia but do not meet New Zealand Quarantine requirements.*
- *There is no justification for the use of irradiation when other methods are available.*

The requirements for amendment of Standard 1.5.3 are clear. There must be a technological need, minimum and maximum dose must be specified and the objective in setting food standards must be met. Whilst quarantine requirements may support the technological need, approval in the *Food Standards Code* does not meet quarantine requirements.

- *The International Consultative Group on Food Irradiation (ICGFI) endorses the max dose of 1 kGy; however, suggested that a minimum dose of 150 Gy and 300 Gy is sufficient to ensure quarantine protection against fruit fly and other insect species respectively.*

- *Clarification of the doses to be used was sought as no information has been provided on what insects are to be targeted and at what dose.*

The maximum of 1 kGy provides an upper limit within which specific minimum doses will be determined based on the pest species and level of quarantine security required. Good agricultural and radiation practice will ensure that the minimum effective dose will be delivered in any situation. However, the minimum dose of 150 Gy was specified as being appropriate to cover most species of fruit fly for pest disinfestations purposes subject to a detailed assessment by the relevant quarantine agencies.

- *As the irradiation process does not kill fruit flies but rather sterilises them, there is a real possibility that there may be surviving larvae. This could be disastrous for New Zealand's horticulture industry.*

This is incorrect. All fruit fly treatments prevent emergence of flies, effectively killing the pests. Furthermore, the mortality rates required are very high so the probability of insects surviving to the adult stage is extremely low. In this respect irradiation quarantine treatments are identical to any other treatment technology.

- *It is necessary for Surebeam to provide data on the necessary radiation dose for the different insects, and the effects of that dose on the Australian varieties of the fruits to be irradiated.*

This information will need to be provided to the relevant quarantine agencies as part of the process of negotiating treatment protocols for pest disinfestations.

- *Alternative techniques that may be used; namely, carbon dioxide/nitrogen blasting, sonar detection, and biological controls (disease/insect resistant plants) for quarantine purposes.*

The techniques cited above may not provide the level of quarantine security required for high-risk pests such as fruit flies. Decisions on the efficacy of such alternatives are a matter for quarantine authorities.

- *Request that FSANZ approach the CSIRO and the Department of Primary Industries to ask for information on fruit developed by these two organizations which have been bred to be insect resistant.*

The CSIRO and Department of Primary Industry stated that there was no active research program being pursued on insect resistant tropical fruits.

- *NZ would be solely reliant on a Queensland certificate that claimed that produce had been properly irradiated. This would lower NZ quarantine protection measures and would greatly increase the likelihood of fruit fly outbreaks in NZ, lead to environmental concerns (as it would require widespread aerial spraying of insecticides).*

- *Key NZ producer groups should be consulted further.*

Quarantine certification requirements are a matter for relevant quarantine authorities. MAFNZ has a policy of industry consultation in matters of import quarantine security. FSANZ has also obtained and added further contacts with key NZ Producer groups in order to keep them fully informed of the application. FSANZ undertakes wide public consultation in Australia and New Zealand on all applications to amend the *Food Standards Code.*

- *Since the submission of 31 October 2001, Canberra Consumer has obtained a statement from the Queensland department of Primary Industries Web Site that the papaya fruit fly has been eradicated in Queensland. This means that there is no technological need to irradiate papayas as a quarantine measure.*

The Queensland Department of Primary Industries declared on 30 April 1999 that the papaya fruit fly had been eradicated. Australia has a number of endemic fruit fly species of quarantine significance in addition to the papaya fruit fly. These will require an effective quarantine treatment before approval to import host produce will be approved by NZ and other countries.

The overall intent of the application is to use irradiation to treat fruit fly pests and other critical quarantine pests, not just papaya fruit fly. Other species of fruit fly exist other than papaya fruit fly. Hancock et al (2000) details that there are 278 species of fruit fly in Australia, although most of these are not regarded to be of quarantine significance.

However, there are other critical quarantine pests such as mango seed weevil and macadamia nut borer (litchi), which restrict access to markets and where irradiation is the only treatment.

Therefore, there is a justified technological need to treat these other species of fruit fly and in addition other pests with an appropriate quarantine treatment such as irradiation.

EFFICACY OF FOOD IRRADIATION

Is there any evidence illustrating the efficacy of irradiation when applied to tropical fruits?

Disinfestation of tropical fruits by irradiation treatment is a valid technological need for the purposes of quarantine. Insect pests endemic to Queensland and of quarantine significance to importing countries represent a major barrier to overcome in gaining access to some markets. E-beam and X-ray irradiation techniques are considered to be equivalent in efficacy to current treatments used.

NUTRITION

Irradiation may diminish the nutritional value and wholesomeness of foods?

Dietary intake assessment indicates that the specified tropical fruits are not significant sources of certain vitamins, including β-carotene, folate, vitamin C and vitamin B_1 within the context of the total dietary intake. Research on the irradiation of the specified tropical fruits in conjunction with the analysis of dietary intake indicate that irradiation will not have a significant nutritional effect on the diet of the Australian and New Zealand populations.

MONITORING AND ENFORCEMENT

How can irradiated products be detected to enable the requirements under the Standard to be enforced?

In Australia, food producers will be required to comply with the *Food Standards Code* that is enforced by the States and Territories. There are significant penalties for individuals and companies in the Food Acts for breaches of requirements of the Food Standards Code. In New Zealand, food producers are required to comply with the Food Act that also contains significant penalties for breaches.

Imported products to Australia and New Zealand will also be required to comply with the requirements of the relevant Standard.

In early 2001, the Codex Alimentarius Commission's Committee on Methods of Analysis and Sampling endorsed five methods for the detection of different irradiated foods (CAC, 2001). The methods provide a very high percentage of correctly identifiable samples, which in some cases are 100 percent. The methods are currently used in practice in some countries with significant success and are thoroughly validated.

The techniques and capability to use these methods exist in Australia and New Zealand but not, at this stage, specifically for testing foods. The necessary set up and quality control systems would need to be established to specifically test for irradiated foods.

In addition, guidelines for a certification system and a model certificate have been developed for the use of import and export authorities for foods irradiated for phytosanitary and other purposes.

What assurance is there that auditing or other appropriate monitoring of irradiation facilities will be undertaken to ensure compliance with the Standard for the Irradiation of Food and other relevant codes or standards?

In Australia, State and Territory regulatory authorities regulate irradiation facilities and compliance with the Food Standards Code. The Australian Quarantine and Inspection Service will ensure that imported foods meet requirements of the Australian Food Standards Code through the Imported Food Inspection System.

In New Zealand, the National Radiation Laboratory undertakes monitoring of irradiation facilities. The Ministry of Health and Public Health Units oversight the inspection of any imported food for compliance with New Zealand food regulations.

Under current food laws, any food business including the applicant or other food manufacturer, would not be required to be audited until the Food Safety Program Standard became mandatory for that class of food business in the relevant State. In the interim, enforcement officers would continue to inspect food businesses to ensure compliance with the regulatory requirements of the Food Standards Code.

DOSAGES

Clarification of the doses to be used was sought as no information has been provided on what insects are to be targeted and at what dose.

This is solely an issue for BA and MAFNZ to determine based on an appropriate and detailed risk assessment. The appropriate quarantine agencies have indicated to FSANZ that a more detailed import risk assessment of the appropriate dose to control pest disinfestation is necessary, even though international research on the efficacy of irradiation as a disinfestation treatment for fruits flies would suggest that the minimum dose of 150 Gy and a maximum of 1 kGy would be an appropriate dose range.

In Australia, within the portfolio of Agriculture, Fisheries and Forestry, BA has responsibility for negotiating quarantine arrangements for the import and export of plant and animal products. BA works closely with the Australian Quarantine and Inspection Service (AQIS) who have responsibility for ensuring that quarantine arrangements for imports and exports have been appropriately implemented in order to protect Australia's biosecurity and to meet the import requirements of Australia's trading partners.

In New Zealand, responsibility for negotiating requirements for imported plant products is conducted by MAFNZ who ensure that quarantine arrangements for imports are actioned in order to deliver on New Zealand's biosecurity requirements and to protect New Zealand from unwanted pests and diseases.

Minimum doses need to be specified to ensure it is sufficient for the purpose.

Significant penalties exist for breaching the *Food Standards Code* (which if amended as recommended will require that the minimum dose of 150 kGy as specified in the standard be used to achieve the technological purpose). Significant penalties exist for misleading or deceptive conduct under the Commonwealth Trade Practices Act, the New Zealand Fair Trading Act and State and Territory Fair Trading Acts. For example it may be a breach of the trade practices legislation, where it was claimed that a product was irradiated to eliminate quarantine pests when in fact this was not the case, or where a lesser dose was used.

The relevant standard requires that records on the minimum and maximum doses absorbed by the food be kept for a period of time that exceeds the minimum durable life of the product by one year.

The proposed international certification system for irradiated foods also requires details of the minimum and maximum absorbed doses to be recorded and verified using proper dosimetric measurement practices in accordance with internationally accepted standards such as those published by ASTM (E1204, E1261, E1431, E1539) or similar standards organisations.

There is no single international method of detection available for irradiated foods.

It is correct that there is no internationally recognised single method of detection for irradiated foods; rather there are various methods. No method of detection is absolutely specific in measurement of the actual dose that was applied to be measured as the changes that irradiation induces in foods is minimal.

However, the International Atomic energy Agency (IAEA) recently published a report detailing the research that had been undertaken on the use of a standardised commercially available label dose indicator which is used to verify the minimum/maximum absorbed dose of irradiated foods (IAEA, 2001).

Recently, the Codex Alimentarius Commission listed five methods of detection for irradiated foods, which allow for detection of food containing fat, bone, cellulose, for example nuts, and food from which silicate minerals can be isolated, herbs and spices. In the paper for the Codex Alimentarius Commission, it was suggested that the methods provided a very high percentage of correctly identifiable samples, that these methods were currently used in some countries and were thoroughly validated.

LABELLING

Labelling issue should be thoroughly considered; as there appears to be uncertainty as to how unpackaged, individually displayed fruit would be designated as being irradiated?

FSANZ does not specify the labelling required for irradiated uncooked fruits and vegetables?

Use of the term ‘electronic pasteurisation’ rather than irradiation is misleading to consumers?

Standard 1.5.3 requires that a package of food that has been irradiated must be labelled with a statement that the food has been treated with ionising radiation. The Standard provides three examples of such statements. These are ‘Treated with ionising radiation’, ‘Treated with ionising electrons’ and ‘Irradiated (name of food)’. It also contains requirements for labelling in relation to irradiated ingredients, and in relation to food not otherwise required to bear a label. The use of the international radura symbol is optional and, if used, should be in close proximity to the name of the food. However, the use of the symbol would be in addition to the statement that the food has been treated with ionising radiation. Any change to this requirement would require an application to change Standard 1.5.3.

An indication of the purpose of food irradiation would also be permitted to be placed on the label provided that is was not false, misleading or deceptive.

FSANZ agrees that the term ‘electronic pasteurisation’ should not be used to indicate that a food or an ingredient of a food had been irradiated. Irradiated food must be labelled in accordance with the general provisions in food law and fair trading law as they relate to false, misleading or deceptive conduct. A declaration that a food had been subject to ‘electronic pasteurisation’ would not comply with the requirements of the standard.

Mandatory labelling regarding information to be displayed at point of sale is historically ignored and not policed?

It is generally an offence under food legislation to sell food that is falsely or misleadingly described. It is generally an offence under trade practices legislation to engage in misleading or deceptive conduct. As it is a mandated requirement for irradiated food to be labeled, it would be an offence not to do so under Standard 1.5.3. These requirements cover both packaged food and food otherwise exempt from bearing a label where that food is displayed.

IMPORT/EXPORT ISSUES

A maximum dose of 1 kGy may be used to irradiate tropical fruits and there may be a neglect of the use of a minimum dose. This may cause problems in countries that choose to irradiate fruits in that there may be inadequate oversight of the process of irradiation and how competent those operators (other than those in the USA that are required to meet specific requirements) are?

This raises concerns for Australia and New Zealand in that Australia/New Zealand may be required to accept irradiated fruits from countries without the same level of rigor as the USA?

Furthermore, if the proposed elimination of the maximum dose limit on irradiated foods is granted by Codex, Australia/New Zealand and the USA will have to accept food that has been treated at a dose above the 1 kGy maximum?

Importers of irradiated foods would be required to adhere to the strict provisions of Standard 1.5.3. This would mean adherence to a minimum dose of 150 Gy and the maximum limit of 1 kGy. Standard 1.5.3 require mandatory record keeping showing, among other things, the minimum and maximum doses imparted to food.

Significant penalties exist for breaching the *Food Standards Code* (which if amended as recommended will require that the minimum dose be used to achieve the technological purpose). Significant penalties exist for misleading or deceptive conduct under the Commonwealth Trade Practices Act, the New Zealand Fair Trading Act and State and Territory Fair Trading Acts.

If a dose higher than 1 kGy were considered necessary in some circumstances, then food treated with higher doses could not be legally sold in Australia or New Zealand unless a formal amendment to the *Food Standards Code* was made.

COSTS VS BENEFITS

Are the Australian tropical fruits producers aware of this application, what effects on food e-beam/x-rays may have and do they want this technology over present methods?

Is there enough demand in New Zealand for irradiated mangoes from Australia?

Is there a market for producers and is it financially viable for them?

The permissions apply only to foods sold in the Australian and New Zealand markets. Permissions to irradiated tropical fruits may have implications for trade between Australia and New Zealand, though quarantine requirements would need to be met.

Letters of support were received from a range of organizations and fruit growers, which would provide a market for Australian growers.

The Cairns Port Authority, State Development Centre Cairns, Cairns Regional Economic Development Corporation and Advance Cairns has estimated that by initiating the Surebeam facility for irradiation of tropical fruits an export market worth $50 million could be established in North Queens land. Markets identified to date include New Zealand, United States and North Asia. The Australian Mango Industry Association Ltd sees the application as an important step in securing other key markets for the purpose of phytosanitary measures; namely, China, Taiwan, Korea and the USA.

IRRADIATION FACILITIES

Many consumer submissions raised issues with respect to proposed irradiation facilities in Queensland. In particular, the following specific questions were raised:

- *The location of the proposed Surebeam facility was not detailed for public information. Requested FSANZ to publish this location on its website.*
- *Tropical fruits would be irradiated at Narangba in Queensland. The proposed Steritech nuclear radiation facility (at Narangba) is too close to residential areas, which may increase the risk to public health and safety. There are no plans to monitor radiation levels in the area to protect resident's health?*

These matters are not addressed by the *Food Standards Code*, but are the subject of regulatory and planning decisions of the relevant State/Territory authorities.

Irradiation facilities are licensed and regulated by the following authorities in Australia and New Zealand:

National level	State or Territory level	Local government level
Australia:		
Australian Radiation Protection and Nuclear Safety Agency (regulates Commonwealth radiation facilities)	Departments of Health or Environment Protection Authority in all Australian States and Territories for licensing and regulation of radiation use, planning, occupational health and safety and food laws	Local government authorities for local planning approvals, enforcement of food laws and standards and registration of food businesses
Department of Environment (environmental considerations depending on the size of the plant).		
Australian Quarantine and Inspection Service (approved quarantine treatment of imports, monitoring under the Imported Food Inspection Program and approval for exports).		
Therapeutic Goods Administration (approval for therapeutic goods).		
Australia New Zealand Food Authority (treatment of food).		
Australian Customs Service (approval for import of radioactive substances).		
New Zealand:		
Ministry of Health through the National Radiation Laboratory (regulates radiation facilities and import/export of radioactive substances)		Local government (planning approvals under the Resource Management Act)
Ministry of Health and Public Health Units (enforces food law, including food standards)		
Ministry of Agriculture and Forestry (Biosecurity), (approval of quarantine treatments)		
Ministry for the Environment (can issue national policy statements, provides guidance to local government)		

The other issues raised (eg occupational health and safety for irradiation workers, and licensing of irradiation facilities) are matters for consideration by the relevant regulatory authorities such as:

- Environment Australia (under the Commonwealth's Environment Protection and Biodiversity Conservation Act) and;

- the Queensland Department of Communication, Local Government Planning and Sport (under the Integrated Planning Act).

Queensland Health also considers applications for permission to possess a radioactive substance under the Queensland Radiation Safety Act.

In Australia, the requirements for the design, administration, operation and safety of irradiation facilities that use X-rays, electrons or gamma radiation for non-medical purposes are established in the National Health and Medical Research Council Code of Practice for the Design and Safe Operation of Non-Medical Irradiation Facilities (Radiation Health Services No. 24, AGPS, Canberra). This Code is applicable to Australian facilities that irradiate foods.

Concerns have been raised about the adequacy of the irradiation process, monitoring of facilities and occupational health and safety.

- *The safety of e-beam/x-ray is seriously questioned in its proposed use on tropical fruit with respect to the workers operating the equipment?*

Any approval to permit the irradiation of food would require the company to be registered under the relevant Australian State or New Zealand requirements as a food business and comply with the relevant requirements of the applicable food regulatory regime.

In Australia, the requirements for the design, administration, operation and safety of irradiation facilities that use X-rays, electrons or gamma radiation for non-medical purposes are established in the National Health and Medical Research Council Code of Practice for the Design and Safe Operation of Non-Medical Irradiation Facilities (Radiation Health Services No. 24, AGPS, Canberra). This Code is applicable to Australian facilities that irradiate foods.

QUALITY OF IRRADIATED TROPICAL FRUITS

Submissions raised a number of points on the quality of irradiated tropical fruits.

At certain doses, particularly, doses closer to the maximum of 1 kGy the quality of the fruit can be affected and FSANZ concurs that not all tropical fruits may be equivalent in quality to each other following irradiation. This is also true for other treatments that are used to meet quarantine regulations (eg, cold and heat treatments may damage tropical fruits).

FSANZ does not mandate what particular technologies can be used to maintain quality of food as the final quality of food, in particular, irradiated tropical fruit is a commercial and marketing decision for growers of tropical fruits and operators of irradiation facilities. This will ultimately determine consumer acceptance of irradiation-treated produce by consumers.

FSANZ sought specific advice from relevant experts to address the following specific questions (in italics) arising from submissions on quality of irradiated tropical fruits.

- *Mangoes and Papaya's-irradiation is not a suitable process for these fruits (e.g. mangoes fail to ripen, colour spotting occurs on the skin, pores turn black and mottled browning of the skin occurs).*

- *Many tropical fruits are sensitive to irradiation damage below 1 kGy. Canberra Consumer provided a copy of a comparison of maximum tolerable doses and minimum dose required for desirable technical effects on fruits and vegetables.*

- *The concept of equivalence does not apply to different varieties of the same fruit.*

Mangoes, papaya and other tropical fruits will tolerate irradiation treatment at the doses required to control fruit flies and other high-risk quarantine pests. Generally, effective irradiation treatments are independent of fruit type. That is, they are based on the pest species and level of quarantine security required.

The Queensland Department of Primary Industries and New South Wales Agriculture conducted irradiation tolerance studies on a wide range of tropical, sub-tropical and temperate fruit using gamma irradiation in the late 1980's and early 1990's. A dose of 600 Gy was the maximum tolerated by 'Kensington Pride' mangoes [Jessup, AJ, CJ Rigney and PA Wills, 'Effects of gamma irradiation combined with hot dipping on quality of 'Kensington Pride' mangoes', *J. Food Sci*. 53(5): 1486-1489.]

Results from a Co-ordinated Research Project between the International Atomic Energy Agency (IAEA) and a large number of countries indicate that papaya, carambola, rambutan, litchi and mango are highly tolerant of irradiation. Atemoya and avocado are of low tolerance. ['Irradiation as a quarantine treatment of arthropod pests', Proceedings of a Final Research Co-ordination Meeting, Joint FAO/IAEA Honolulu, Hawaii, 3-7 November, 1997. IAEA-TECDOC-1082.]

- *It is accepted in the radiation industry that high dose gamma sources are unsuitable for use at low levels, especially less than 1 kGy.*

- *Inadequate information has been provided by the applicant with respect to energy levels of the e-beams and x-rays and how the fruit would be packaged or presented to the irradiation beams. This suggests that the efficacy of using such beams on thicker unevenly shaped produce such as tropical fruits is doubtful. How will the applicant ensure that all surfaces and the inner flesh of the fruits receive an irradiation dose exceeding the minimum required to sterilise ALL fruit fly larvae?*

The larger and more dense the product the less penetrative are electron beams, X rays and gamma irradiation. 'Dose mapping' where sample products, in their packaging, are tested for uniformity of dose received is essential for any irradiation procedure. This is carried out by placing a number of dosimeters (small indicators of dose received) on, in and around the product. Dose mapping gives details of the ratio of the maximum dose received by the product to the minimum dose received (max:min ratio).

The max:min ratio, when the product is being irradiated for phytosanitary purposes, must be such that the minimum dose received is the target insecticidal dose e.g. 150 Gy for fruit flies. If the max:min ratio is 4 then that means that some portions of the load will receive a dose of 600 Gy which may damage the appearance of some mango varieties.
Product uniformity, uniformity of packaging, mixtures of different-sized products and variability of tightness of packaging within the load will affect the dose received.

Therefore, the technical aspects of applying irradiation treatments are well understood and the regulatory framework will ensure that treatment equipment is performing efficiently. The maximum energy associated with e-beams is defined at 10 MeV. Proper dose mapping and dosimetry will ensure that treatments are applied so as to deliver an effective dose to the centre of the product. This will be a critical aspect of the development and demonstration of an effective treatment protocol.

REFERENCES

ASTM E1204 Practice for Dosimetry in Gamma Irradiation Facilities for Food Processing

ASTM E1261 Guide for the Selection and Calibration of Dosimetry Systems for Radiation Processing

ASTM E1431 Practice for Dosimetry in Electron and Bremsstrahlung Irradiation Facilities for Food Processing

ASTM E1539 Guide for the Use of Radiation Sensitive Indicators

CAC, 2001 Report of the Twenty-Third Session of the Codex Committee on Methods of Analysis and Sampling:

Diehl JF (1995) Safety of Irradiated Foods, Pub Marcell Dekker, NY.

EN 1784: Detection of Irradiated food containing fat, gas chromatographic analysis of hydrocarbons

EN 1785: Detection of Irradiated food containing fat, gas chromatographic/mass spectrometric analysis of 2-alkylcyclobutanones

EN 1786: Detection of Irradiated food containing bone, method by ESR spectroscopy

EN 1787: Detection of Irradiated food containing cellulose, method by ESR spectroscopy

EN 1788: Detection of Irradiated food from which silicate minerals can be isolated, method by thermoluminescence.

Hancock DL, Hamacek EL, Lloyd AC and Elson-Harris MM (2000) The Distribution and host plants of fruit flies (diptera: tephritidae) in Australia, QDPI, Brisbane 2000

House of Representatives (1989) Report on the Use of Ionising Radiation prepared by the House of Representatives Standing Committee on Environment, Recreation and the Arts, Canberra.

International Atomic Energy Agency (IAEA) (March 2001). Standardised methods to verify absorbed dose in irradiated food for insect control. *Proceedings of a final Research Co-ordination Meeting organized by the Joint FAO/IAEA Division of Nuclear Technologies in Food and Agriculture, Portugal, 30 March-3 April 1998.*

International Consultative Group on Food Irradiation (ICGFI) 1999. *Facts about Food Irradiation.*

WHO, 1994. Safety and Nutritional Adequacy of irradiated Food. Geneva, Switzerland: World Health Organization; 1994.

WHO, 1999. High-dose irradiation: wholesomeness of food irradiated with doses above 10kGy. Report of a Joint FAO/IEAE/WHO study group. WHO Technical Report Series 890.

USFDA (1986) United States Food and Drug Administration. Irradiation in the production, processing, and handling of food; final rule. Federal Register, 51 FR 13375-13399, 18 April 1986.

ATTACHMENT 6

APPROVAL OF IRRADIATION OF FRUITS IN OTHER COUNTRIES

The following approvals have been granted for irradiation of fruits, including tropical varieties. This data was obtained from the International Consultative Group on Food Irradiation data-base of clearances of irradiated foods.

It should be noted that disinfestation may also infer a broader meaning than a phytosanitary measure. It also includes treatments that may be carried out for non-quarantine purposes (for example to destroy non-quarantine pests that may affect the quality of the fruit) and quarantine measures that may be applied to pests that are injurious to humans, animals or animal products. Both of these are regarded as sanitary measures and are quite distinct from phytosanitary measures.

Approval of Irradiation of Fruits (General)

Explanations for Codes : 1. Delay ripening/physiological growth, 2. Disinfestation, 3. Microbial control, 4. Quarantine treatment, 5. Shelf-life extension, 6. Sprouting inhibition 7. Trichina/parasite control, 8. Sterile meals for hospital patients, 9. Sterilization, 10. Unstated.

FRUIT

Country	Code	Type of Clearance	Date	Dose Max (kGy)
BRAZIL	1,4,5	UNCONDITIONAL	30.01.01	**
CROATIA	1,3	UNCONDITIONAL	21.06.94	3.00
GHANA	1,2,4	UNCONDITIONAL	15.01.98	1.00
GHANA	5	UNCONDITIONAL	15.01.98	2.50
ISRAEL	2	UNCONDITIONAL	17.02.87	1.00
MEXICO	1,4	UNCONDITIONAL	07.04.95	1.00
MEXICO	5	UNCONDITIONAL	07.04.95	2.50
PAKISTAN	1,2,4	UNCONDITIONAL	07.03.96	1.00
RUSSIAN FEDERATION	5	CONDITIONAL	11.07.64	4.00
TURKEY	1,2,4	UNCONDITIONAL	06.11.99	1.00
TURKEY	5	UNCONDITIONAL	06.11.99	2.50
UKRAINE	5	CONDITIONAL	11.07.64	4.00
UNITED KINGDOM	2	UNCONDITIONAL	01.01.91	2.00
USA	1,2	UNCONDITIONAL	18.04.86	1.00

Approvals for Mangoes

Explanations for Codes : 1. Delay ripening/physiological growth, 2. Disinfestation, 3. Microbial control, 4. Quarantine treatment, 5. Shelf-life extension, 6. Sprouting inhibition 7. Trichina/parasite control, 8. Sterile meals for hospital patients, 9. Sterilization, 10. Unstated.

MANGO

Country	Code	Type of Clearance	Date	Dose Max (kGy)
BANGLADESH	1,2	UNCONDITIONAL	29.12.83	1.00
BRAZIL	1,4,5	UNCONDITIONAL	30.01.01	**
CHILE	2	UNCONDITIONAL	29.12.82	1.00
COSTA RICA	2,5	UNCONDITIONAL	07.07.94	1.00
CROATIA	1,3	UNCONDITIONAL	21.06.94	3.00
CUBA	1	CONDITIONAL	01.07.92	0.75
GHANA	1,2,4	UNCONDITIONAL	15.01.98	1.00
GHANA	5	UNCONDITIONAL	15.01.98	2.5
INDIA	1,2	UNCONDITIONAL	06.04.98	0.75
ISRAEL	2	UNCONDITIONAL	17.02.87	1.00
MEXICO	1,4	UNCONDITIONAL	07.04.95	1.00
MEXICO	5	UNCONDITIONAL	07.04.95	2.50
PAKISTAN	1,2,4	UNCONDITIONAL	07.03.96	1.00
RUSSIAN FEDERATION	5	CONDITIONAL	11.07.64	4.00
SOUTH AFRICA	2	CONDITIONAL	25.08.78	4.00
SYRIA	2	UNCONDITIONAL	02.08.86	1.00
THAILAND	1,2	UNCONDITIONAL	04.12.86	1.00
TURKEY	1,2,4	UNCONDITIONAL	06.11.99	1.00
UKRAINE	5	CONDITIONAL	11.07.64	4.00
UNITED KINGDOM	2	UNCONDITIONAL	01.01.91	2.00
USA	1,2	UNCONDITIONAL	18.04.86	1.00

Guava

Explanations for Codes : 1. Delay ripening/physiological growth, 2. Disinfestation, 3. Microbial control, 4. Quarantine treatment, 5. Shelf-life extension, 6. Sprouting inhibition 7. Trichina/parasite control, 8. Sterile meals for hospital patients, 9. Sterilization, 10. Unstated.

GUAVA >>Refer to the Explanatory Notes<<

Country	Code	Type of Clearance	Date	Dose Max (kGy)
BRAZIL	1,4,5	UNCONDITIONAL	30.01.01	**
CROATIA	1,3	UNCONDITIONAL	21.06.94	3.00
GHANA	1,2,4	UNCONDITIONAL	15.01.98	1.00
GHANA	5	UNCONDITIONAL	15.01.98	2.5
ISRAEL	2	UNCONDITIONAL	17.02.87	1.00
MEXICO	1,4	UNCONDITIONAL	07.04.95	1.00
MEXICO	5	UNCONDITIONAL	07.04.95	2.5
PAKISTAN	1,2,4	UNCONDITIONAL	07.03.96	1.00
RUSSIAN FEDERATION	5	CONDITIONAL	11.07.64	4.00
TURKEY	1,2,4	UNCONDITIONAL	06.11.99	1.00
UKRAINE	5	CONDITIONAL	11.07.64	4.00
UNITED KINGDOM	2	UNCONDITIONAL	01.01.91	2.00
USA	1,2	UNCONDITIONAL	18.04.86	1.00

Unconditional:
Regulatory approval of an application without any further condition to be fulfilled for the continued application of irradiation treatment of the food or group/class of food.

Conditional:
Regulatory approval of the irradiation treatment of the food or group/class of food subject to certain conditions relating to duration of approval, total quantity of food permitted to be irradiated.

** The minimum dose must be sufficient to achieve the intended objective; the maximum dose must be less than that which would compromise the functional properties or the organoleptic attribute of the food.

ATTACHMENT 7

Information Sheet-Chemiclearance and radiolytic products

- The safety evaluation of irradiated foods based on the results of chemical analysis has been termed **chemiclearance** and has been used by International Expert Committees to clear foods that are similar in chemical makeup to others that have had extensive toxicological evaluations previously performed (WHO, 1981).

- Irradiation of food like other food processing techniques breaks larger molecules into smaller ones (fragments). Each of the three major macronutrients in food (carbohydrates, proteins and fats) gives rise to different types of radiolytic products. These radiolytic products have been chemically analysed and consist of common chemicals produced either in the biochemical pathways of the human body or from other treatment processes such as heating. Examples include, carbon dioxide, hydrogen, ammonia, short chain alkanes, alkenes, aldehydes, triglycerides and free fatty acids.

- Previous studies have concluded that no volatile compounds produced in foods by irradiation have been found that were not found naturally occurring in raw foods or in foods processed by other technologies.

- The possible exceptions to this are compounds known as 2-alkylcyclobutanones, in particular, 2-dodecyclobutanone (2-DCB), which, although not yet proven to be a unique radiolytic product is produced following irradiation of fat-containing food. It was suggested in a recent study that 2-DCB caused DNA strand breaks in cells taken from the large bowel of rats when they were incubated *in vitro* with 2-DCB.

- However, this study was inconclusive, because there were limitations in the assay used to detect mutations, and the number of rats used were small (six in number). Further studies have been recently undertaken with 2-DCB and other alkylcyclobutanones. These will be published in the near future.

- Overall, previous studies have also determined that the production of radiolytic products follow predictable pathways and that irradiation of specific classes of food groups (eg meats, fats and starches) produces a similar range of chemical products. However, there are some exceptions with fats that are saturated compared to unsaturated fats; both, producing quite different products following irradiation.

- This has allowed scientists to conclude that data from toxicological studies including chemical analysis, various test-systems as microorganisms and animal feeding studies previously performed on individual irradiated foods can be extrapolated to other untested members of the same class by virtue of the consistency in chemistry and the precise toxicological studies performed on similarly chemically related foods.

WHO (1981) Wholesomeness of irradiated food. Report from a Joint FAO/IAEA/WHO Expert Committee. WHO Technical Report Series 659.

ATTACHMENT 8

EXECUTIVE SUMMARY OF CONSUMER REPORT

Perceptions of Food Irradiation in New Zealand and Australia

Sensory and Consumer Team

June 2001

Consumer and industry beliefs, attitudes, and perceptions of irradiated foods have been investigated and previous studies carried out in this area have been reviewed. Consumer opinions were explored before and after the viewing of a video on irradiated foods using a focus group approach in which the moderator directed the flow of the discussion, and in a series of questionnaires. Industry opinion was solicited in the series of interviews with Australian and New Zealand companies.

CONSUMERS

Knowledge and education:

- consumers have little knowledge of irradiated foods, and many are suspicious of the technology and expect it will be dangerous;
- this lack of knowledge may expose Australasian industries to the risk that public opinion may reject irradiation of foods on the basis of irrational arguments;
- public education should be a priority;
- the content and context in which the information is presented are critical;
- consumers are suspicious of educational material that seems to present only one side of the story;
- consumers would trust safety endorsements from consumer organizations, Government health departments, FSANZ and AIFST, and television current affair programmes;
- consumers tend to mistrust organizations not specific to their own country (eg. American Medical Association and the FDA).

Level of concern:

- following the presentation of information to participants in this study, we found that they developed a consensus that irradiation was of only minor concern;
- consumers who initially had major concerns about irradiation became less concerned, while consumers who initially had no concern or were unsure of their concern became more concerned;
- other food safety issues such as use of spray chemicals, spoilage of food, and fumigation were of more concern than irradiation.

Fears:

- the fears that consumers have for irradiated foods include: exposure to radiation, reduction in nutrients and wholesomeness of the food, damage to the environment, and workers' safety;

- consumers are also concerned that irradiation will be used as a substitute for safe food production and they do not want shelf life to be increased.

Willingness to purchase irradiated products:

- this is much lower in Australia and New Zealand than in the USA;
- purchase intent for irradiated products varies between 20 to 25% for strawberries and 50 to 55% for sterilised foods for the immuno-compromised, and is much higher for non-food products such a sterilised medical or household goods with 75% of consumers indicating they will purchase these products.

Views on domestic use of irradiated foods:

- within the domestic market, consumers continue to have faith in the integrity of the food supply chain;
- while food irradiation will enhance food safety in the domestic market, it will be a double-edged sword in that successful marketing may need to alert consumers to the high levels of risk associated with some products.

Views on export of irradiated foods:

- consumers were very sensitive to positive and negative impacts that irradiation might have in the export markets for our commodity products;
- some consumers may respond to pragmatic economic arguments that export industries need access to irradiation facilitates in order to remain competitive in the future.

INDUSTRY

Food Exporters:

- many food exporters anticipate that many of their clients will require products to be irradiated to fulfil phytosanitary and/or food safety regulations, but fear that a backlash against the technology by anti-irradiation activists within their own country will stall future developments.
- they also fear that regulations may stop the building of an irradiation facility and prohibit the irradiation of food;
- many food exporters believe that they will benefit from irradiated foods and may be willing to contribute to public education in order to increase the speed with which irradiation and facilities can be established.

Food Importers:

- importers focus on the perceptions of their own domestic consumers, who they feel will be suspicious of irradiated products;
- they feel that the benefits of irradiation will be in improved public health and improved biosecurity;

- they expect that consumers will benefit in terms of having access to better tasting produce that has not been fumigated and is available out of season, and new products which do not usually have a sufficient shelf life for importation into Australia or New Zealand;
- many importers have indicated that they would not be prepared to import irradiated foods due to the high cost of educating New Zealand and Australian consumers. They expect that once this education process has occurred, competitors will enter the market with their own irradiated products and without having to carry the cost of educating the public;
- importers expect that the government should have the major role in public education.

APPENDIX 1

LIST OF SUBMITTERS FOR SECOND ROUND OF CONSULTATION

SUBMITTER		COMPANY	STATE	COUNTRY
Birks	Julia			
Blair	Gillian			
Briggs	Janelle			
Bunce	Charlie			
Coppoli	Gail			
Courtney-Haentjes	Inge			
Cross	Arianne			
Dunnit	Herbert			
Feldman	Mark			
Francina	Franceska			
Hall	Tanya			
Hayes	Karen			
Hoad	Kate			
Holik	John			
Hoodwin	Marcia			
Howden	Kristin			
Joblin	Ken			
Karavan	Pandora			
Klink	K&K			
La Rocca	Sam			
Lees	Susie			
Leisegang	Jill			
Mackenzie	John			
Massart	Claire			
Meuth	Michael			
Morell	G.C.			
Queitzsch	Melissa			
Rose	Lizzie			
Rozanski	Emma			
Rozencwajg	J.			
Saul	Miriam			
Schmist	Carol			
Shields	Bromwyn			
Smith	Paul	Simples Herbs and Herbal Products		
Smith	Phillip			
Storey	Jason			
Sullivan	Jim			
Teodori	Carol			
Thompson	David			
Tkalec	Gelsa			
Tursi	Patricia			
Unicorn	Azeema			
Vine	Johanna			
Wild	Katharine			
Woollcott	Tory			

Wright	Sue	Mater Misericordiae Health Services		
Downer	Tony	Australian Food and Grocery Council	ACT	AUS
Odgers	Wendy	Biosecurity Australia - AFFA	ACT	AUS
Peters	Frank	Canberra Consumers Incorporated	ACT	AUS
Stynes	Brian	Bio Security Australia - AFFA	ACT	AUS
Bartlett	Kate		NSW	AUS
Bradbury	David		NSW	AUS
Brecht	Paul		NSW	AUS
Byrne	M.		NSW	AUS
Carey	Carolyn		NSW	AUS
Coogan	JM		NSW	AUS
Cramer	Sue		NSW	AUS
Crane	P.R.		NSW	AUS
Dolman	J.H.		NSW	AUS
Field	Susan		NSW	AUS
Gray	Simon		NSW	AUS
Greenhalgh	Zoe		NSW	AUS
Hugill	D.M.		NSW	AUS
John	Vanessa		NSW	AUS
King	Louise		NSW	AUS
Lee	H.		NSW	AUS
Methmen	S.		NSW	AUS
Oehlman	Robert		NSW	AUS
Palese	Blair		NSW	AUS
Pigott	Jeremy	Steritech Pty Ltd	NSW	AUS
Secombe	Gillian		NSW	AUS
Slazenger	Regina	Member for Monaro and ACT Health Care Consumers Association	NSW	AUS
Starr	Cara		NSW	AUS
Stevens	Natalie	People for Nuclear Disarmament	NSW	AUS
Store	Keith		NSW	AUS
Taylor	Helen		NSW	AUS
Valenalde	D.		NSW	AUS
Wotton	Helene		NSW	AUS
Zable	Benny		NSW	AUS
Adlerq	Kathy		QLD	AUS
Agar	Laurence		QLD	AUS
Alexander	Jodi		QLD	AUS
Allen	Barry		QLD	AUS
Anderson	B.		QLD	AUS
Andresen	Brit		QLD	AUS
Andrew	P.		QLD	AUS
Appel	Janette R		QLD	AUS
Ash	S.		QLD	AUS
Ashdown	C.		QLD	AUS
Atley	Jim		QLD	AUS
Azul	M.J.		QLD	AUS
Bacon	Gordon		QLD	AUS
Bailey	Alison		QLD	AUS
Barnes	Anna		QLD	AUS
Barnett	Tessa		QLD	AUS

Barnstein	Rebekah		QLD	AUS
Barrett	M.		QLD	AUS
Batista	Ana		QLD	AUS
Baumann	Trent		QLD	AUS
Bavich	Vicki		QLD	AUS
Beach	David		QLD	AUS
Beath	Neile		QLD	AUS
Behn	D. J.		QLD	AUS
Bell	Heath		QLD	AUS
Bell	John		QLD	AUS
Bell	Kerry	Qld Environmental Health Unit	QLD	AUS
Bell	Scott		QLD	AUS
Best	Glenys		QLD	AUS
Bielby	Gary	Public Health Services Environmental Health Unit	QLD	AUS
Binney	Sheriden		QLD	AUS
Bird	Cameron		QLD	AUS
Blair	Melissa		QLD	AUS
Bond	Sue		QLD	AUS
Bone	B.M.		QLD	AUS
Bonneau	Katie		QLD	AUS
Booker	Paul		QLD	AUS
Booshand	Peter		QLD	AUS
Booth	Linda		QLD	AUS
Boue Vidya	Bhu		QLD	AUS
Boyd	S.		QLD	AUS
Boz	Sharyn		QLD	AUS
Bray	Belinda		QLD	AUS
Brazier	Fleur		QLD	AUS
Briggs	Kaye		QLD	AUS
Brisbin	Chris		QLD	AUS
Brittain	Charles	Top Crop Lychee	QLD	AUS
Brosnan	L.		QLD	AUS
Brown	Gregory		QLD	AUS
Brown	J.N.		QLD	AUS
Brown	Michelle		QLD	AUS
Bugeja	Marie		QLD	AUS
Burnett	Rhandall		QLD	AUS
Burridge	Chris		QLD	AUS
Bushell	Mike		QLD	AUS
Caldwell	Lisa		QLD	AUS
Callaway	Stephen		QLD	AUS
Callus	Andrea		QLD	AUS
Cameron	P.		QLD	AUS
Campbell	Chris		QLD	AUS
Charlton	David		QLD	AUS
Chollinda	John		QLD	AUS
Christ	Fay & Colin		QLD	AUS
Christensen	Belinda		QLD	AUS
Clark-Jones	Allan		QLD	AUS
Clifford	Jocelyn		QLD	AUS

Cobbe	R.D.		QLD	AUS
Coghill	Terry		QLD	AUS
Cole	E.A.		QLD	AUS
Coleman	David		QLD	AUS
Colgain	Paul		QLD	AUS
Colless	Suzanne		QLD	AUS
Collis	Jeanette		QLD	AUS
Connellan	V.J.		QLD	AUS
Conrad	Joyce		QLD	AUS
Conroy	Ann		QLD	AUS
Conyers	Robert A.		QLD	AUS
Cook	Deb		QLD	AUS
Cook	Max		QLD	AUS
Corcoran	Kathy		QLD	AUS
Cormack	Jess		QLD	AUS
Courtney	D.		QLD	AUS
Courtney	Kathryn		QLD	AUS
Cox	A.J.		QLD	AUS
Craig	Nola		QLD	AUS
Creevey	Victoria		QLD	AUS
Cunningham	D.		QLD	AUS
Cunningham	Sarah		QLD	AUS
Cutuli	D.		QLD	AUS
Dalman	A.		QLD	AUS
Davey	D.		QLD	AUS
Daysh	Michael	Surebeam Australia Pty Ltd	QLD	AUS
De Guzman	Esther		QLD	AUS
De Jong	Glenn		QLD	AUS
De Jong	Karen		QLD	AUS
Dealcour	G.		QLD	AUS
Delacour	Debbie		QLD	AUS
Dempster	R.S.		QLD	AUS
Dewar	Des		QLD	AUS
Dickinson	Trevor		QLD	AUS
Donaldson	Kerrie		QLD	AUS
Donnell	B.		QLD	AUS
Donovan	Anna		QLD	AUS
Doocey	Jaunta		QLD	AUS
Douglas	K.		QLD	AUS
Doyle	B.		QLD	AUS
Duffy	Rebecca	Friends of the Earth (Australia)	QLD	AUS
Eastment	Leonie		QLD	AUS
Eastment	M.E.		QLD	AUS
Edward-Moon	Rohan		QLD	AUS
Egan	Helen		QLD	AUS
Egan	Josephine		QLD	AUS
Fawcett	Tara		QLD	AUS
Feeney	Jackie		QLD	AUS
Ferguson	S.G.		QLD	AUS
Ferritto	A.		QLD	AUS

Fisher	Audrey		QLD	AUS
Fisher	Family		QLD	AUS
Fisher	W.		QLD	AUS
Fitz-Walter	John		QLD	AUS
Fitzgerald	Marie		QLD	AUS
Flynn	Mary		QLD	AUS
Ford	John		QLD	AUS
Foreman	Peter		QLD	AUS
Forsberg	Emma		QLD	AUS
Frawley	B.C.		QLD	AUS
Fredriksen	Graham		QLD	AUS
Furci	Robyn		QLD	AUS
Furner	Yvonne		QLD	AUS
Fysh	Claire		QLD	AUS
Gabbett	Christine		QLD	AUS
Gabloivski	June		QLD	AUS
Gardner	Scott		QLD	AUS
Gare	J.		QLD	AUS
Gee-Clough	B&K		QLD	AUS
Geritz	J.		QLD	AUS
Ghesh	Ratna		QLD	AUS
Giarraputo	Vicki		QLD	AUS
Gibson	Jason		QLD	AUS
Gilbert	M.		QLD	AUS
Gillard	Ebba		QLD	AUS
Gillard	Glen		QLD	AUS
Gillard	Nicholle		QLD	AUS
Glazbrook	Buddy		QLD	AUS
Glenville	R.		QLD	AUS
Glynn	Marian	Mater Children's Hospital	QLD	AUS
Goddard	Anne		QLD	AUS
Goerres	B&B		QLD	AUS
Goerres	Bruno		QLD	AUS
Goldie	Adele		QLD	AUS
Goodwin	Russell		QLD	AUS
Goohey	Cecily		QLD	AUS
Gordon	Beth		QLD	AUS
Gormley	Jean		QLD	AUS
Graham	W.		QLD	AUS
Gray	Terri		QLD	AUS
Green	Angela		QLD	AUS
Green	Malcolm		QLD	AUS
Griese	J.D.		QLD	AUS
Griese	Judith		QLD	AUS
Griffin	C.		QLD	AUS
Griffin	J.A.		QLD	AUS
Gurnett	Kev		QLD	AUS
Hadley	Stephen		QLD	AUS
Hancott	Paul		QLD	AUS
Hansen	C.		QLD	AUS
Hansen	Julie		QLD	AUS

Harris	J.		QLD	AUS
Harris	Maureen		QLD	AUS
Harrison	Ann		QLD	AUS
Hayes	Patricia		QLD	AUS
Heaps	Laraine		QLD	AUS
Heaslip	Natalie		QLD	AUS
Hellen	John		QLD	AUS
Hellonist	D.		QLD	AUS
Hendy	Helen		QLD	AUS
Hener	S.		QLD	AUS
Hennessy	J.F.		QLD	AUS
Hennesy	Rebecca		QLD	AUS
Higgins	Derek		QLD	AUS
Higgins	Douglas		QLD	AUS
Higgins	Edna		QLD	AUS
Higgins	Sonia		QLD	AUS
Hill	Mevryn		QLD	AUS
Hillier	Kayley		QLD	AUS
Hodge	Brittany		QLD	AUS
Hodge	Jordan		QLD	AUS
Hodges	Denise		QLD	AUS
Holland	Susan		QLD	AUS
Hollindale	K.		QLD	AUS
Hollis	Michael		QLD	AUS
Holmes	Gilbert		QLD	AUS
Hoye	Nicole		QLD	AUS
Hudson	Angelee		QLD	AUS
Hull	N.		QLD	AUS
Hutchinson	Maree G		QLD	AUS
Hutton	A.L.		QLD	AUS
Hutton	Peter D		QLD	AUS
Hyde	D.R.		QLD	AUS
Ingram	David		QLD	AUS
Irle	Trudie		QLD	AUS
Irwin	Althea		QLD	AUS
Jacobs	Paul		QLD	AUS
Jalgli	H.		QLD	AUS
Jarrett	D.L.		QLD	AUS
Jeffs	Dianne		QLD	AUS
Jeffs	Patrick		QLD	AUS
Jell	Frank		QLD	AUS
Johnson	Harry		QLD	AUS
Johnstone	Shona		QLD	AUS
Jones	Kristin		QLD	AUS
Jordan	Elizabeth		QLD	AUS
Kalas	Vivian		QLD	AUS
Kamhoctz	Michelle		QLD	AUS
Kastriosios	Natasha		QLD	AUS
Kelly	P.L.		QLD	AUS
Kerr	I&P		QLD	AUS
Kershovfle	Sharyn		QLD	AUS

King	Mary		QLD	AUS
Krohn	J&H		QLD	AUS
Larkin	Damian		QLD	AUS
Larnach	K.		QLD	AUS
Larocca	Frank		QLD	AUS
Larocca	Gloria		QLD	AUS
LaRocca	Sam		QLD	AUS
Lawson	Claire		QLD	AUS
Le Bherz	R.		QLD	AUS
Leay	W.D.		QLD	AUS
Leed	Shirley		QLD	AUS
Leedie	Aaren		QLD	AUS
Leonard	S.		QLD	AUS
Letat	Nadia		QLD	AUS
Letica	Anthony		QLD	AUS
Lettice	Peter		QLD	AUS
Lewis	Shane		QLD	AUS
Linnan	Michael	Qld Government State Development Centre	QLD	AUS
Lovett	David		QLD	AUS
Luhrs	Robert		QLD	AUS
Lynch	Joan		QLD	AUS
Lynch	Mary		QLD	AUS
Macarthur	J.P.		QLD	AUS
Macey	Gertrude		QLD	AUS
MacQueen	Angus		QLD	AUS
Macrae	Justin		QLD	AUS
Man	Kim		QLD	AUS
Mangan	Ella		QLD	AUS
Mann	Debra		QLD	AUS
Marsh-Collins	Paul		QLD	AUS
Martin	Glenn D.		QLD	AUS
Martin	Suzanne		QLD	AUS
Mateos	Yvonne		QLD	AUS
May	Karen		QLD	AUS
Mays	L.H.		QLD	AUS
McAlister	Libby		QLD	AUS
McAlpine	Chris		QLD	AUS
McArdle	Janelle		QLD	AUS
McBride	Robert C.		QLD	AUS
McCallum	J.		QLD	AUS
McCarter	Marian		QLD	AUS
McCaughey	Julie		QLD	AUS
McDonald	J.		QLD	AUS
McGibbon	Stephen		QLD	AUS
McGrath	V.M.		QLD	AUS
McGregor	A.		QLD	AUS
McGregor	Wayne		QLD	AUS
McKee	Iain		QLD	AUS
McKeonn	S.		QLD	AUS
McMahon	C.		QLD	AUS

McMurtry	A.		QLD	AUS
McNabb	Sarah		QLD	AUS
Meiklejohn	R.		QLD	AUS
Mellor	K.		QLD	AUS
Menzies	S.G.		QLD	AUS
Messina	Rachel		QLD	AUS
Messingbird	Rebecca		QLD	AUS
Milne	Anne		QLD	AUS
Mitchell	D.		QLD	AUS
Mitchell	Jean		QLD	AUS
Molyneux	J.C.		QLD	AUS
Monaghan	Janey		QLD	AUS
Moore	Pat		QLD	AUS
Moro	Joe	Mareeba District Fruit & Vegetable Growers Association	QLD	AUS
Morris	Daryl		QLD	AUS
Morton	B.		QLD	AUS
Muir	R.J.		QLD	AUS
Mullins	Justin		QLD	AUS
Murphy	Brad		QLD	AUS
Murray	G.		QLD	AUS
Musgrave	Elizabeth		QLD	AUS
Neale	Douglas		QLD	AUS
Nehrlich	H.H.		QLD	AUS
Neisler	M.A.		QLD	AUS
Nelson	E.		QLD	AUS
Neville	Melissa		QLD	AUS
New	D&P		QLD	AUS
Newman	Carmen		QLD	AUS
Nixon	S.		QLD	AUS
Noble	Louise		QLD	AUS
Norris	David		QLD	AUS
Norris	Michael		QLD	AUS
Nurser	D.H.		QLD	AUS
Nurser	Valerie		QLD	AUS
O’Brien	Eileen F.		QLD	AUS
O’Brien	Joshua		QLD	AUS
O’Connell	Michael		QLD	AUS
O’Connor	Pedro	Centre for Wet Tropics Agriculture	QLD	AUS
O’Currett	Bradley		QLD	AUS
O’Donoghue	Margaret		QLD	AUS
O’Hagan	Judith		QLD	AUS
O’Hare	Christine		QLD	AUS
O’Reilly	Amanda		QLD	AUS
Orme	Jane		QLD	AUS
Owens	Ken		QLD	AUS
Paasonen	Karl-Erik		QLD	AUS
Palmer	E.N.		QLD	AUS
Parusel	Mark		QLD	AUS
Pathak	Prethika		QLD	AUS
Payne	Cheryl		QLD	AUS

Pechey	Gillian		QLD	AUS
Pegs	Deborah		QLD	AUS
Pensa	Jennifer		QLD	AUS
Perry	A.M.		QLD	AUS
Perry	Belinda		QLD	AUS
Perry	Lex		QLD	AUS
Petersen	Sue		QLD	AUS
Petroff	Greg		QLD	AUS
Phillips	J.		QLD	AUS
Pierschel	Marc		QLD	AUS
Pijnapper	M..		QLD	AUS
Pilat	Cathy		QLD	AUS
Pointing	Elizabeth		QLD	AUS
Pollard	Eileen		QLD	AUS
Pope	Laurel		QLD	AUS
Pope	Peter		QLD	AUS
Poulter	John		QLD	AUS
Poulter	John		QLD	AUS
Powell	Carol		QLD	AUS
Pratley	Dean		QLD	AUS
Pratt	Julie P.		QLD	AUS
Price	John		QLD	AUS
Prosser	John		QLD	AUS
Protheroe	Denise		QLD	AUS
Quatacker	Bettina		QLD	AUS
Quickfall	Patricia		QLD	AUS
Quinn	Roseanne		QLD	AUS
Ralli	Maria		QLD	AUS
Ralli	Robert		QLD	AUS
Ramselaar	Margaret		QLD	AUS
Raulaul	Margaret		QLD	AUS
Raymer	Vera		QLD	AUS
Regeling	Craig		QLD	AUS
Reilly	F.		QLD	AUS
Rennie	Frank		QLD	AUS
Reynolds	Ivan		QLD	AUS
Richards	G.W.		QLD	AUS
Richards	Janine		QLD	AUS
Richardson	Graeme		QLD	AUS
Ringrose	J.		QLD	AUS
Roach	Norman		QLD	AUS
Roache	Sussan		QLD	AUS
Robbins	Rebecca		QLD	AUS
Robert	C.		QLD	AUS
Roberts	Cameron		QLD	AUS
Roberts	Larissa		QLD	AUS
Roberts	L&P		QLD	AUS
Robertson	Lisa		QLD	AUS
Robino	Janet		QLD	AUS
Robinson	Glenda		QLD	AUS
Robinson	L.		QLD	AUS

Rogers	S.		QLD	AUS
Roth	Stephen		QLD	AUS
Rusk	Linda		QLD	AUS
Russell	Brad		QLD	AUS
Russell	Kerry		QLD	AUS
Ryan	Emmet		QLD	AUS
Ryan	Gabrielle		QLD	AUS
Ryan	Wendy		QLD	AUS
Rylatt	K.		QLD	AUS
Rylatt	Neal		QLD	AUS
Sailes	V.		QLD	AUS
Saunders	L.D.		QLD	AUS
Schiffer	M.		QLD	AUS
Schultz	Andrew		QLD	AUS
Schultz	Anthony		QLD	AUS
Schultz	Martin		QLD	AUS
Scopes	Robert		QLD	AUS
Sedlbauer	Marlene		QLD	AUS
Sercombe	Annette		QLD	AUS
Seymour	D.		QLD	AUS
Shears	Joan		QLD	AUS
Shoecraft	Jean		QLD	AUS
Shoecraft	Julia		QLD	AUS
Siemons	B.		QLD	AUS
Sloane	Lance		QLD	AUS
Smart	H.R.		QLD	AUS
Smith	J&M		QLD	AUS
Smith	Jan		QLD	AUS
Smith	Matthew		QLD	AUS
Smith	Ross		QLD	AUS
Smith	Vanessa		QLD	AUS
Smyth	Robbie		QLD	AUS
Somerfield	Stefan		QLD	AUS
Sorensen	Ben		QLD	AUS
Spinks	Andrew		QLD	AUS
Stabe	Moyna		QLD	AUS
Stacey	M&D		QLD	AUS
Stanic	Rayna		QLD	AUS
Stanton	Charlene		QLD	AUS
Stevens	Michael		QLD	AUS
Stewart	E.C.		QLD	AUS
Stewart	Karen		QLD	AUS
Stewart	Kim		QLD	AUS
Stolic	S.		QLD	AUS
Storey	Jason		QLD	AUS
Stork	Susan		QLD	AUS
streets	G.R.		QLD	AUS
Stringer	Jill		QLD	AUS
Suhaimi	Karyn		QLD	AUS
Sullivan	Patricia		QLD	AUS
Sullivan	Stephen		QLD	AUS

Tanzer	G.		QLD	AUS
Tasken	Fred		QLD	AUS
Tauberfeld	Robin	Before Breakfast Productions	QLD	AUS
Taylor	S.		QLD	AUS
Templeton	N.C.		QLD	AUS
Templeton	Terrie		QLD	AUS
Ter Hoeve	Seb		QLD	AUS
Thomas	David		QLD	AUS
Thomas	Julie		QLD	AUS
Thomas	Kaye		QLD	AUS
Thompson	Barbara		QLD	AUS
Tofts	David		QLD	AUS
Tofts	Jay		QLD	AUS
Tofts	Samantha		QLD	AUS
Truscott	Lisa		QLD	AUS
Turner	Brett		QLD	AUS
Turner	Chris		QLD	AUS
Turner	Claire		QLD	AUS
Turner	G. L.		QLD	AUS
Turner	Valerie		QLD	AUS
Vageley	B.		QLD	AUS
van Arkel	Christian		QLD	AUS
Ventura	A.P.		QLD	AUS
Vickery	Sean		QLD	AUS
Vickey	Lynne		QLD	AUS
Vingerboed	J.		QLD	AUS
Volter	A.		QLD	AUS
Vosper	Jessica		QLD	AUS
Wakefield	Julie		QLD	AUS
Walker	J.		QLD	AUS
Walker	K.		QLD	AUS
Wall	Clint		QLD	AUS
Wall	Glen		QLD	AUS
Walsh	Elizabeth		QLD	AUS
Walton	Stephen		QLD	AUS
Warwick	Nikki		QLD	AUS
Watkins	Dianne		QLD	AUS
Watts	J&W		QLD	AUS
Webb	J. I.		QLD	AUS
Wedd	Erilyn		QLD	AUS
West	Dwayne		QLD	AUS
Whisson	N.		QLD	AUS
White	Christina		QLD	AUS
White	D.		QLD	AUS
White	Emma L.		QLD	AUS
Wicks	Gavin		QLD	AUS
Williams	A.		QLD	AUS
Williams	Gabrielle		QLD	AUS
Williams	Lois		QLD	AUS
Williams	Yolande		QLD	AUS
Wilmink	Margaret		QLD	AUS

Wilton	Danielle		QLD	AUS
Wind	Malcolm		QLD	AUS
Windsor	Judith		QLD	AUS
Withers	Stephen		QLD	AUS
Wolfenden	Trisha Lee		QLD	AUS
Woodgate	Betty H.		QLD	AUS
Wyatt	Ruth		QLD	AUS
Young	Mark		QLD	AUS
Zardani	Yvonne	Australian Pensioners & Superannuants' League Inc.	QLD	AUS
Adams	Ian		VIC	AUS
Allen	J.		VIC	AUS
Bayes-Kennedy	B.		VIC	AUS
Blakeney	Debbie		VIC	AUS
Bowler	Paul		VIC	AUS
Cameron	Beth		VIC	AUS
Chipper	Simon		VIC	AUS
Coleman	Ryan		VIC	AUS
Coles	Sarah		VIC	AUS
Gill	David	Food Technology Association of Victoria	VIC	AUS
Hall	Janet		VIC	AUS
Hyde	Anna		VIC	AUS
Lees	Ben		VIC	AUS
Miller	Eric		VIC	AUS
Milton	Peter		VIC	AUS
Moleta	Clare		VIC	AUS
Pastalatzis	Nick		VIC	AUS
Pearson	Victoria		VIC	AUS
Peters	Simon		VIC	AUS
Redwood	Jill		VIC	AUS
Rizvi	Sarah		VIC	AUS
Roberts	Genevieve		VIC	AUS
Ruzzene	F.		VIC	AUS
Samuels	Brett		VIC	AUS
Schapper	Kay		VIC	AUS
Settle	Domenica		VIC	AUS
Sorresine	Samantha		VIC	AUS
Woodston	Raynes		VIC	AUS
Erskine	Jim		VIC	AUS
McLaughlin	Virginia	Health Department of Western Australia	WA	AUS
Anderson	Robert	Physicians & Scientists for Responsible Genetics	TAURANGA	NZ
Bleakley	Claire		FEATHERSTON	NZ
Ennis	Michael	Action for Environment Inc.	WELLINGTON	NZ
FitzSimon	Anne		NELSON	NZ
Grammer	Zelka		WHANGAREI	NZ
Inkster	Carole	NZ Food Safety Authority	WELLINGTON	NZ
MacClement	David		GREENHITHE	NZ
Morrow	L.D.		AUCKLAND	NZ
Nalder	Kevin	NZ Fresh Produce Importers Association Inc.	WELLINGTON	NZ
Silcock	Peter	NZ Fruit Growers Federation	WELLINGTON	NZ

Tait	R.E.	Friends of the Earth (NZ)	AUCKLAND	NZ
van Heerden	Sharyn		KAITAIA	NZ
Carapiet	J.		AUCKLAND	NZ
Lyndon	Rex	Bucher-Alimentech Ltd	AUCKLAND	NZ
Seagar	Rhonwen		MOTUEKA	NZ
Creasy	Richard	Local Authority Solutions	TAURANGA	NZ
Rebmann	Hank		WAITATI	NZ
Bannatyne	Kay	Bannatyne Landscape Architects	WELLINGTON	NZ
Fahey	Rayna		WELLINGTON	NZ
Brown	Barbara		CA	USA
Caldwell	Pearl		CA	USA
Cashman	Martha	Surebeam Corporation	CA	USA
Dames	Christine		CA	USA
Daniels	Karil		CA	USA
Darnell	Lyn		CA	USA
De Sio	Elisse		CA	USA
Galbavy	Ronald		CA	USA
Gausewitz	Marilyn		CA	USA
Guinan	Valerie		CA	USA
Johnson	Eleanor		CA	USA
Kohler	John		CA	USA
Krauss	Sabrina		CA	USA
LeFan	John		CA	USA
Long	Freddie		CA	USA
Mason	Jackie		CA	USA
Morrison	John		CA	USA
Pridgeon	Carol		CA	USA
Roux	Dorothy		CA	USA
Saavedra	Y.		CA	USA
Showalter	James		CA	USA
Woolsey	Ron		CA	USA
Wright	Dennis		CA	USA
Gillis	William		CO	USA
McQuaite	Caitlin		CT	USA
Pedler	Deborah		CT	USA
Ceravolo	Katherine		FL	USA
Larson	David		FL	USA
Baumwald	Keith		GA	USA
Edwards	Andrew		GA	USA
Hatcher	Jeffrey		HI	USA
Allen	Robert		IL	USA
Grover	Ravi		IL	USA
Martirano	Dorothy		IL	USA
Roux	D&C		IL	USA
Prudlow	Robert		IN	USA
Kiebler	Kurt		KS	USA
Cevasco	John		MA	USA
Kendall	K.		MA	USA
Mondello	Corey		MA	USA
Blevins	Vivian		MD	USA
Gallagher	Timothy		MI	USA

Jakobcic	Fred		MI	USA
Meisler	Laura		MI	USA
Otto	Michael		MI	USA
Parmer	Bobbi		MI	USA
Dunbar-Ortman	Debbie		MN	USA
Falcon	Michael		MN	USA
Markwart	Anton		MN	USA
Fischer	Jeremy		MO	USA
McMahon	Mary		MO	USA
Jirak	Karen		NC	USA
Makrucki	Michele		NC	USA
Whitefield	Anne		NC	USA
Kinsman	K&P		NJ	USA
Cohen	Lisa		NY	USA
Connor	Thomas		NY	USA
Cozens	Mike		NY	USA
Fredericks	Misha		NY	USA
Guinan	Rosanne		NY	USA
Landa	Hazel		NY	USA
Malkind	Stephanie		NY	USA
Swinnen	Gie		NY	USA
Ragsdale	Grace		OH	USA
Heckman	James		PA	USA
Thompson	Ian		PA	USA
Demmer	Dian		SC	USA
Bonney	James		TX	USA
Dority	Heather		TX	USA
Kresha	Matthew		TX	USA
Toynes	Barbara		TX	USA
Lanzman	Sarah		VA	USA
Pearce	Ellen		VA	USA
Spaulding	Marie		VA	USA
Peterson	Jennifer	Public Citizen Protecting Health Safety & Democracy	WASHINGTON DC	USA
Demar	Ben		WA	USA
Howald	William		WA	USA
Johnson	Tom		WA	USA
Rodman	Constance		WA	USA
Scarmato	Keith		WA	USA
Wright	John		WA	USA
Newhouse	Chrisopher		WI	USA