**Want to say NO! to irradiated blueberries and raspberries?**

DEADLINE FOR SUBMISSIONS: 6pm (Canberra time) 10 August 2016

Make sure you write ‘Submission’ and quote the correct project number and name: **A1115 Irradiation of blueberries and raspberries.**

FSANZ also requests your name and contact details, address, email, phone, organisation and position (if applicable**)**

You can send your submission electronically through the FSANZ website:

http://www.foodstandards.gov.au/code/changes/submission/Pages/SubmissionForm.aspx

OR

email your submission directly to: submissions@foodstandards.gov.au.

***Irradiated superfoods? Say no to the irradiation of blueberries and raspberries!***

*Once prohibited in Australia and New Zealand, irradiation is now being promoted here - primarily as a quarantine treatment – as a replacement for some post-harvest chemicals. Irradiation, however, brings its own risks to the table…*

Recent approvals for commonly eaten fruits and vegetables significantly increase the proportion of irradiated foods in the average Australian and New Zealand diet. So far, Food Standards Australia New Zealand (FSANZ) has approved: herbs, herbal infusions, spices, tomatoes, capsicums, mangoes, pawpaws, mangosteens, carambolas, breadfruit, litchis, rambutans, longans, custard apples, apples, apricots, cherries, nectarines, peaches, plums, honey dews, rockmelons, strawberries, table grapes and zucchini and squash.

**They now want to add blueberries and raspberries to that list.**

The NSW government has made an Application to Food Standards Australia New Zealand (FSANZ) to irradiate blueberries and raspberries. These berries are considered by many to be “superfoods” and valued for their high antioxidant levels, anthocyanin and Vitamin C content.

Irradiation would see these tiny berries exposed to ionising radiation at doses ranging from 150 Gray (Gy) - 1 kGy. This is equivalent to exposing them to approximately 1.5 million – 10 million chest X-rays (calculated at the low end of chest X-ray exposure).

Ionising radiation changes the molecular structure of food, producing free-radicals, depleting antioxidants such as vitamin C and nutrition, and creating chemical compounds unique to radiation exposure. Numerous scientific studies have shown potential health risks associated with irradiating food. In fact, in 2008 -2009 up to one hundred Australian cats developed neurological disorders linked to the consumption of irradiated cat food. The risk to humans has not been ruled out.

**Numerous alternatives exist**

Despite this, in Australia and New Zealand, irradiation is being promoted as an “alternative” to certain pesticides, the uses of which have been restricted. The reality is, however, that fruit producers who use chemical pesticides - and opt to irradiate - will use irradiation on top of chemicals. Irradiation is not necessary for quarantine purposes of pest management as both radiation-free and chemical-free options exist. To protect their reputation and the Australian market, these “superfoods” should be produced to maximise their nutritional value and freshness. They should be grown as closely to nature and possible – with neither harmful pesticides nor irradiation.

**Processed, not fresh**

Once exposed to high levels of ionising radiation, raspberries and blueberries, prized for their natural goodness, can no longer be considered “fresh” – they will, in fact, be “processed. Changes made to fruits and vegetables as a result of processing with irradiation are substantial and significant - and cannot be discerned with our ordinary senses.

Indeed, the test for irradiation is the presence of “radiolytic products” and free radicals. FSANZ confirms: "Irradiation potentially causes both macro and micronutrient changes in foods, depending on the irradiation dose, the food’s composition and environmental conditions.”

**Adulterated superfoods?**

* In recognition that irradiation alters the nature of food, irradiation is regulated as a food additive in the US and irradiated food is labelled accordingly. The 1958 Food Additives Amendment describes irradiated food as “adulterated.” <http://www.fda.gov/Food/IngredientsPackagingLabeling/IrradiatedFoodPackaging/default.htm>
* In Australia Irradiation approvals are given under Food Standard 1.5.3; irradiation is regulated as a food processing technique. [*http://www.comlaw.gov.au/Details/F2009C00895*](http://www.comlaw.gov.au/Details/F2009C00895)
* Both the Queensland and Victorian government’s use phrases such as a “food preservation method” and a “processing and preservation” technique in explaining food irradiation. *http://www.health.qld.gov.au/foodsafety/documents/fs-39-irradiation.pdf* [*http://www.betterhealth.vic.gov.au/bhcv2/bhcarticles.nsf/pages/Food\_irradiation*](http://www.betterhealth.vic.gov.au/bhcv2/bhcarticles.nsf/pages/Food_irradiation)

It is clear that irradiated food is not fresh – it is intentionally and significantly altered. The likely increased transport time coupled with the further processing of blueberries and raspberries will further diminish the nutritional value and appeal of these wonderful fruits.

**Consumer nuclear industry**

The irradiation industry in Australia and New Zealand is nuclear. All commercially operating irradiation facilities use gamma radiation from radioactive Cobalt-60 sourced from a nuclear reactor in Canada and involve the transport, use, storage and management of radioactive materials. The push to expand the list of irradiated foods supports and aims to legitimise the consumer face of the nuclear industry.

**Labelling under threat**

Finally, as the irradiation process is, in effect, invisible, labelling is the only mechanism by which a consumer can distinguish between irradiated and non-irradiated food. The mandatory labelling requirements for irradiated food in Australia and New Zealand are under review. It is clear that the industry is keen to increase the amount of food it irradiates and sees labelling as standing in the way to consumer acceptance. There is no assurance in this application that labelling requirements will remain. Irradiated food must be labelled “treated with radiation” or “irradiated –‘

**Good food does not need irradiating!** The irradiation of blueberries and raspberries is unnecessary. The perceived pest control benefit to the farmers is outweighed by potential risks to consumers, the environment and the health-promoting nature of berriesl Please let FSANZ and your local food authorities know that you so NO! Together, we can keep irradiation food off our tables!

**Saying NO!**

Food regulations must pass through the Ministerial Council before becoming law. Each state has at least one state MP on the Council which means each of us have a representative on the Council who can say NO!. Let the ministers and decision makers know how you feel about irradiation and labelling to help make a decision in favour of shoppers’ rights. **Please send your message to your state or territory’s members as well as federal reps**. The list and a sample letter is below.

To get involved in the campaign to stop food irradiation and to ensure that all irradiated food is comprehensively labelled:

Email: [foodirradiationwatch@yahoo.com.au](mailto:foodirradiationwatch@yahoo.com.au)

[www.foodirradiationwatch.org](http://www.foodirradiationwatch.org)

LIKE us on FB: <https://www.facebook.com/notofoodirradiation/?fref=nf>

***Please send your message to your state or territory’s members as well as federal reps****. The “Lead” ministers addresses are here. A full list is available further below & at www.foodirradiationwatch.og*

Australian Government:

The Hon Dr David Gillespie MP

E-mail: [David.Gillespie.MP@aph.gov.au](mailto:David.Gillespie.MP@aph.gov.au)

Hon Barnaby Joyce, MP

Minister for Agriculture

[minister@maff.gov.au](mailto:minister@maff.gov.au)

New Zealand:

Hon Jo Goodhew   
Minister for Food Safety

jo.goodhew@parliament.govt.nz

ACT:

Mr Simon Corbell  
Minister for Health

**E:**corbell@act.gov.au

NSW:

The Hon Niall Blair, MLC  
Minister for Primary Industries  
E: [niall.blair@parliament.nsw.gov.au](mailto:niall.blair@parliament.nsw.gov.au)

NT:

Lead Minister:  
The Hon John Elferink, MLA  
Email: [Minister.Elferink@nt.gov.au](mailto:Minister.Elferink@nt.gov.au)

QLD:

Lead Minister:  
The Hon Cameron Dick, MP  
**Email:** [health@ministerial.qld.gov.au](mailto:health@ministerial.qld.gov.au)

**Email:** [Woodridge@parliament.qld.gov.au](mailto:Woodridge@parliament.qld.gov.au)

SA:

Hon Jack Snelling, MP

Minister for Health and Ageing

PO Box 2555 Adelaide SA 5001

[minister.health@health.sa.gov.au](mailto:minister.health@health.sa.gov.au)

TAS:

Hon Michael Ferguson, MP

Minister for Health

[michael.ferguson@parliament.tas.gov.ua](mailto:michael.ferguson@parliament.tas.gov.ua)

VIC:

The Hon Jill Hennessy, MP  
Minister for Health

**Email:** [minister.health@health.vic.gov.au](mailto:minister.health@health.vic.gov.au)  
Email: [jill.hennessy@parliament.vic.gov.au](mailto:jill.hennessy@parliament.vic.gov.au)

WA:

Hon Dr Kim Hames, MLA MBBS, JP

Minister for Health

PO Box 5551 Falcon WA 6210

[kim.hames@mp.wa.gov.au](mailto:kim.hames@mp.wa.gov.au)

Australian Local Government Association:

Mayor Troy Pickard  
President

Email: troy.pickard@joondalup.wa.gov.au

**Sample letter:**

To: Food Standards Australia New Zealand

Email: [submissions@foodstandards.gov.au](mailto:submissions@foodstandards.gov.au)

CC: Your state/ territory Health Minister & the federal Health Minister

RE: **Reject Application A1115: Stop the irradiation of Blueberries and Raspberries**

I oppose the irradiation of blueberries and raspberries. I, therefore, call on you to reject Application A1115 for the irradiation of Raspberries and Blueberries and to ensure that it is not approved.

The NSW government has made an Application to Food Standards Australia New Zealand (FSANZ) to irradiate blueberries and raspberries. These berries are considered by many to be “superfoods” and valued for their high antioxidant levels, anthocyanin and Vitamin C content.

Irradiation would see these tiny berries exposed to ionising radiation at doses ranging from 150 Gray (Gy) - 1 kGy. This is equivalent to exposing them to approximately 1.5 million – 10 million chest X-rays (calculated at the low end of chest X-ray exposure).

Ionising radiation changes the molecular structure of food, producing free-radicals, depleting antioxidants such as vitamin C and nutrition, and creating chemical compounds unique to radiation exposure.

Numerous scientific studies have shown potential health risks associated with irradiating food. In fact, in 2008 -2009 up to one hundred Australian cats developed neurological disorders linked to the consumption of irradiated cat food. The risk to humans has not been ruled out.

Irradiation is not necessary for quarantine purposes of pest management as both radiation-free and chemical-free options exist.

Once exposed to high levels of ionising radiation, these fruits prized for their natural goodness can no longer be considered “fresh” – they will appear fresh, but in fact be “processed.

Finally, I am not confident that I will be able to distinguish between irradiated and non-irradiated food as labelling requirements are under review. There is no assurance in this application that labelling requirements will remain. Irradiated food must be labelled “treated with radiation” or “irradiated –‘

I call on you to reject A1115 as it is not in the public interest.

I look forward to your response and to working with you to keep our food nutritious, healthy and safe for all Australians and New Zealanders.

Thank you,

Name & Date:

Addres (email & postal) & Phone number:

*Food regulations Ministerial Council – Complete address list*

*Food regulations must pass through the Ministerial Council before becoming law. Each state has at least one STATE MP on the Council. Let the ministers and decision makers know how you feel about irradiation labeling to help make a decision in favour of shoppers’ rights.* ***Please send your message to your state or territory’s members as well as federal reps****.*

Membership of the Australia and New Zealand Ministerial Forum on Food Regulation (the Forum) Membership of the Forum comprises a Minister from New Zealand and Health Ministers from Australian States and Territories, the Australian Government, as well as other Ministers from related portfolios (Primary Industries, Consumer Affairs etc) where these have been nominated by their jurisdictions. This ensures a whole-of-food chain approach to food regulation.

Australian Government:

The Hon Dr David Gillespie MP

Parliament Office

PO Box 6022

House of Representatives

Parliament House

Canberra ACT 2600

E-mail: [David.Gillespie.MP@aph.gov.au](mailto:David.Gillespie.MP@aph.gov.au)

Hon Barnaby Joyce, MP

Minister for Agriculture

PO Box 6022, House of Representatives  
Parliament House Canberra, ACT 2600

[minister@maff.gov.au](mailto:minister@maff.gov.au)

New Zealand:

Hon Jo Goodhew   
Minister for Food Safety

Private Bag 18888   
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jo.goodhew@parliament.govt.nz

ACT:

Mr Simon Corbell  
Minister for Health

ACT Legislative Assembly

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Useful all Qld members mailing lists:

<https://www.parliament.qld.gov.au/members/current/mailing-lists>

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