

## submissions

---

**From:** Grant Hewison [REDACTED]  
**Sent:** Tuesday, 29 March 2016 4:15 PM  
**To:** standards management; submissions  
**Subject:** Submission to Labelling review recommendation 34 - irradiation labelling

This is a personal submission.

[REDACTED]

[REDACTED] .

[REDACTED]

First, I wish to endorse and support the detailed submission of Food Irradiation Watch/Friends of the Earth Brisbane and the submission of Friends of the Earth(NZ).

An important principle of consumer choice is that if a food is irradiated, it is clearly labelled as such. Without labelling there is no basis for any form of informed consumer food choice.

On this basis the two big inquiries held in Australia, the "Food Irradiation 1987", by the Australian Consumers Association, and the "Use of Ionising Radiation - Report of the House of Representatives (Senate) Standing Committee on Environment, Recreation and the Arts, 1988, both found that mandatory labelling was required. Previously the International Union of Consumer Union of Consumer Unions had also taken this position.

In my view there is a sound and scientific reason for this, due to the fact that irradiated food has been exposed to ionising radiation.

Only ionising radiation has the energy to break stable molecular bonds, thus creating ions, including free radicals that were never present in the food item prior to it being irradiated. That is how irradiation "works" - to damage pests or pathogens - the ionising radiation and the free radicals damages DNA {which is a comparatively large molecule/target} - and not only the DNA of the pests/pathogens.

The scientific fact is that every molecule of everything that is subject to the intense irradiation process in the irradiation chamber gets exposed to ionising radiation.

It is the presence of ionised molecules - sometimes termed URP's (Unique Radiolitic Products) that are the markers found when a food is laboratory tested to confirm that it has been irradiated. Some of these are carcinogenic, as was confirmed in the earlier ANZFA/FSANZ report issued prior to the approval of irradiated mangoes.

I do not believe it is in the interests of consumers in NZ to unknowingly eat irradiated food.

Consequently, I fully support the need for clear mandatory labelling of all irradiated foods.

It is clear that sellers of mangoes do not want consumers to know if a food has been irradiated, as they use extremely tiny print on much of the irradiated mangoes I currently observe.

I look forward to receiving confirmation of receipt and acceptance of this submission, and I would be grateful if you could please include me in your further information.

Regards

**Dr Grant Hewison**  
[REDACTED]