

27 June 2014

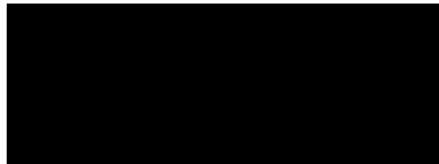
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Dear Sir/Madam

Attached are the comments that the New Zealand Food & Grocery Council wishes to present on the ***Call for Submissions – Application A1088 Sodium Hydrosulphite as a Food Additive.***

Yours sincerely



Katherine Rich
Chief Executive

Food Standards Australia New Zealand
CALL FOR SUBMISSIONS – APPLICATION A1088 SODIUM
HYDROSULPHITE AS A FOOD ADDITIVE

27 June 2014

The New Zealand Food & Grocery Council (the “NZFGC”) welcomes the opportunity to comment on the ***Call for Submissions – Application A1088 Sodium Hydrosulphite as a Food Additive***.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates over \$28 billion in the New Zealand domestic retail food, beverage and grocery products market, and over \$26 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand, representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Application A1088

New Zealand abalone have historically been bleached for canning and export to meet consumer expectations of ‘golden blonde to nutmeg’ coloured abalone species found elsewhere in the world. A number of food additives are permitted for this purpose but not sodium hydrosulphite. It is understood that during processing sodium hydrosulphite decomposes to produce the same chemical species that result from the use of other approved sulphites.

Overarching Comments

NZFGC supports the Application A1088 noting that there are no identifiable health and safety issues above those of the currently permitted sulphites in canned abalone.

Specific Comments

NZFGC notes that sodium dithionite (the trade name for sodium hydrosulphite at the time) was approved in 1990 for use in the abalone industry by the then New Zealand Ministry of Agriculture and Fisheries. Unfortunately, that approval was not transferred over to the Australia New Zealand Food Standards Code when the Code was implemented in New Zealand. Sodium hydrosulphite therefore has a long history of use in New Zealand bleaching of canned abalone (paua).

NZFGC understands that research, carried out by Massey University in New Zealand, has confirmed that sodium hydrosulphite is fully utilised in the preparation of abalone prior to canning and that there is no evidence of residual sodium hydrosulphite in the canned product. The Massey research also found that sodium hydrosulphite was the most effective substance available for bleaching abalone when compared with a range of other substances such as enzymes, surfactants, ammonium carbonate, and hydrogen peroxide. The research found that no other agent would give the same quality of product, in terms of colour, texture and flavour

NZFGC also notes that a number of other countries permit sodium hydrosulphite for use as a food additive (Canada, Japan and Korea). As with New Zealand, these countries have major

fishing industries and it is for use with such products, particularly crustacea, that sodium hydrosulphite is favoured.

The risk assessment concludes that sodium hydrosulphite as a food additive in canned abalone is technologically justified, its use will not result in dietary exposure to a new food additive or additional dietary exposure to sulphites and that labelling (mandatory declaration of sulphites in the ingredients list) addresses the sensitivity that some individuals have to sulphites.

For all these reasons, NZFGC supports the application for sodium hydrosulphite to be added to Standard 1.3.1 for use in canned abalone (paua).