

FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

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SUBMISSION

10 February 2013

Attention: **Project Manager P1019**

Food Standards Australia New Zealand
Box 7186,
Canberra BC,
ACT, Australia
2610.

Re: Carbon Monoxide as a Processing Aid in Fish

FTA Australia has reviewed this [Proposal](#) and endorses the following comments of the Technical Sub Committee:

The Committee agreed with the intent of FSANZ to remove the permission for the use of Carbon Dioxide as a Processing Aid for fish.

However the Committee considered that there were several matters that also required addressing prior to any draft variations being prepared, as follows:

1. ANZFSC does not contain a definition of “smoking” in reference to the process of “smoking” and just not the simple addition of a liquid smoke flavour. What materials can be used in a smoking process and are there limitations on any harmful substances formed during this process, etc?
2. The question was asked as to whether Carbon Monoxide could be used as an ingredient in food and declared as such in the Ingredient list and this approach would probably be permissible and would produce the same technological functions of enhancing the colour of the fish and also extending the shelf-life .
3. Is the use of Nitrites/Nitrate any different when used with permission as a Colour Fixative (i.e. to enhance the colour) and also as a preservative, which is to extend shelf-life?
4. Apparently there is a patented product that is used as an ingredient and called “Colourless, Odourless Smoke” which is primarily Carbon Dioxide made from wood (?) charcoal and produces the desired technological functions in enhancing the fish colour without adding any flavour and is correctly labeled as an ingredient. How will this product be addressed by the proposed change?
5. Irrespective of the colour enhancement of fish, degradation of fish is caused by microbiological spoilage, which may be delayed but not prevented by use of Carbon Monoxide.
6. When Carbon Monoxide is used with fish, once the colour is formed by binding of the Carbon Monoxide to the fish protein (?) the colour is fixed and will not be further enhanced unless additional Carbon Dioxide is added. Once the added Carbon Dioxide performs its initial reaction with fish then there is no further enhancement and therefore this use fulfils the definition of a

Processing Aid. Although the fish colour may persist for an extended time, the Carbon Monoxide is no longer performing any technological purpose or function. It is a one-time reaction, then ceases once the colouration is formed.

7. If this logic that is applied to Carbon Monoxide, in that is not a Processing Aid because it has an ongoing technological function, then many other Processing Aids, when subjected to the same rationale will have to have their status as a Processing Aid questioned.

[REDACTED]

We would appreciate being maintained on the circulation list for any changes in this matter and to receiving notification of the next step concerning this [Proposal](#).

Yours sincerely,

[REDACTED]

Food Technology Association - Australia