



11 February 2013

Project Manager
Proposal P1019
Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610

Dear sir/madam,

**Call for Submissions – Proposal 1019
Carbon monoxide as a processing aid for fish**

This is in response to the Call for Submissions in relation to Proposal P1019 – Carbon Monoxide as a Processing Aid.

By way of background, the Food & Beverage Importers Association (FBIA) is an industry association that represents importers of food and beverages, both retail ready and ingredients for further processing, into Australia.

The stated purpose of this proposal is to make clear that the Food Standards Code does not permit carbon monoxide to be used as a processing aid for fish. One of the requirements for processing aid is that it does not perform a technological function in the final food (Standard 1.3.1, clause 2). When fish is treated with carbon monoxide, an effect of the treatment is colour preservation in the final food. It is argued that this colour fixing effect is an ongoing technological function and therefore, because carbon monoxide has an ongoing technological function in fish, its use in fish does not meet the definition of a processing aid.

The Call for Comments paper states that agencies responsible for enforcing the Australia New Zealand Food Standards Code (the Code) have consistently regarded the treatment of fish with carbon monoxide gas is not permitted by the Code, and therefore, the proposal will bring regulatory certainty. It is not apparent, however, in the Call for Submissions what the precise problem with the current standard is that prevents or makes difficult its enforcement as currently written. Further clarification of the concerns with the current wording would be appreciated.

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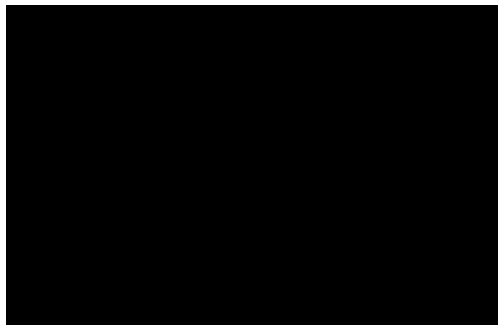
We are aware of the comments by the Australian Food & Grocery Council in relation to technologies that involve the modified atmosphere packaging (MAP) of seafood, as the gas mixtures used may contain levels of carbon monoxide consistent with the natural atmosphere. We support the AFGC's position in regard to setting a residual level for carbon monoxide in fish that has been smoked or packaged using MAP.

While we accept there may be a need to clarify the permission for the use of carbon monoxide as a processing aid for seafood, we are concerned that without consideration of the AFGC's comments, there may be unintended consequences from the proposed clarification that restrict innovation or the use of new technologies.

If you wish clarification of these comments, please do not hesitate to contact us.

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Yours faithfully,



Tony Beaver
Director