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Walker Seafoods Australia P/L
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25 January 2013

To: Steve McCutcheon, CEO
Food Standards Australia New Zealand
Boeing House
55 Blackall Street
BARTON ACT 2600

Dear Sir

Re: FSANZ Regulation of Carbon Monoxide as a processing aid in fish

Food Standards Australia New Zealand FSANZ has continually refused to approve the use of Carbon Monoxide (CO) in the processing of fish. Many other nations including the European Union and Japan have also banned the use of CO in fish processing, and the importation of fish processed elsewhere using CO.

Australia is currently inundated with fish that has been processed using CO as a colouring and fixing agent. We import large quantities of CO treated Tuna, Swordfish and Mahi Mahi loins from Indonesia, Taiwan and the Philippines.

There are also Australian companies that are producing CO treated product which they claim is approved, due to the CO being produced by "wood smoke". These companies claim their product is treated with CO using a "cold smoking" or "tasteless smoke" method.

The main proponent of this technique is a company called Coral Sea Fishing Pty Ltd. This company has set up their "approved" system of CO processing in both Indonesia and Australia. Coral Sea Fishing Pty Ltd claims that because their Carbon monoxide is filtered from smoke from wood chips, it is an acceptable method of processing fish with Carbon Monoxide.

My local seafood retailer, has purchased a system to process fish from Coral Sea Fishing Pty Ltd. They use this system to introduce CO to all the fillets and loins sold from the shop front. The effect of the process allows the store owner to disable the consumer's ability to discern the freshness and quality of the products on sale.

A large proportion of the CO treated tuna loins imported into Australia are used in the bourgeoning Sushi market. By the very nature and definition of Sashimi, the consumer believes that they are consuming and extremely fresh, healthy and high quality product. The consumer however is receiving a "tasteless smoked"

Carbon Monoxide infused product that appears to be fresh and of high quality, but is actually neither of these things. It exemplifies the deception to the consumer that is made possible by this processing method.

The age of this raw product is indeterminable, It's unnatural shelf life also presents health risks. How long is one able to serve masked long-life fish in a raw state? It would normally be simple for a consumer to discriminate between fresh and rotten raw fish.

The health risks associated with CO treated fish is well documented. Some of the reasoning behind the banning of this product in Europe is given below:

Microbiological aspects
The inclusion of CO in MAP is controversial because the stable cherry-colour can last beyond the microbial shelf life of the meat and thus mask spoilage (Kropf, 1980). The extended shelf life obtained by MAP may, therefore, under certain conditions imply increased risk of growth of pathogens (Silliker and Wolfe, 1980; Hintlian and Hotchkiss,1986; Farber, 1991; Lamberts et al., 1991).

Another matter for concern is the highly damaging effect to Australia's domestic fisheries of the growing, large scale importation of these products from Indonesia. Local operators cannot compete with the brightly coloured fish that appear to be fresher and of better quality than the local product. Wholesalers and retailers prefer the gassed fish because of it's unrestricted shelf life.

Australian Tuna fishing vessels in the Eastern Tuna Billfish Fishery (ETBF) normally supply Australia's capital cities with fresh Swordfish, Yellowfin Tuna and Mahi Mahi in whole or loin form. In recent years the demand for local product in these growing markets has been decimated by the importation of so called "fresh" loins.

As an example; ten years ago Mooloolaba ETBF operators would supply about 40 tons of Swordfish into Melbourne each month for a reasonable price, now the number would be around 4 tons. Local sustainable operators have been sent to the wall by the importation of gassed fish. The ETBF in recent years has gone from 160 vessels to about 25 now.

Australia has on of the highest regulated fisheries in the world; all our fisheries have to be sustainable by law.

It is illegal for local operators to use Carbon Monoxide on their fish, but they are forced to compete with unsustainably caught, poorly regulated foreign product that has been treated with Carbon Monoxide.

There is also the confusing issue of Coral Sea Fishing Pty Ltd being permitted to treat their fish products with Carbon Monoxide by FSANZ. The system that they claim is patented is clearly not for traditionally smoked flavours and textures, but just a deceitful way to get Carbon Monoxide into their fish product, which is being passed of to the consumer as "fresh".

This regulatory loophole needs to be examined by FSANZ. The active ingredient

in the “tasteless smoking” process is undeniably Carbon Monoxide. The fact that the CO is used for the technological function of colouring and/or colour fixing means it is unquestionably being used as a processing aid.

The high level of importation of CO gassed fish and the approval of Coral Sea Fishing Pty Ltd’s Carbon monoxide loophole is clearly unfair to the Australian fishing operator and Australian consumer alike. It is clearly in the best interest of the Australian consumer and fishing operator that FSANZ takes action on these matters.

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Yours sincerely,

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Director

Walker Seafoods Australia Pty Ltd

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Source for Microbiological aspects:
EUROPEAN COMMISSION
HEALTH & CONSUMER PROTECTION DIRECTORATE-GENERAL
Directorate C - Scientific Opinions
C2 - Management of scientific committees II; scientific co-operation and networks
Scientific Committee on Food
SCF/CS/ADD/MSAd/204 Final
18 December 2001
