

Application Number:

Application A1088

Me:

[REDACTED]
[REDACTED]
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Ngā mihi,

My submission is in **opposition** to Seafood New Zealand Limited's application to include sodium hydrosulphite as a food additive to be used in canned pāua. The application is to allow Seafood New Zealand (the Applicant) to "bleach the natural black colour of the native New Zealand abalone to a more consumer-acceptable colour"¹.

I am opposing the submission for the following reasons:

- The Applicant has explained the risks of including hydrosulphite as a food additive, but does not highlight the costs of not permitting hydrosulphite
- The Applicant has not provided evidence of considering alternative solutions to its so-called issue
- The Applicant has not included the cultural effects of hydrosulphite

I provide further explanation of these reasons:

The application explains the some risks of including hydrosulphite as a food additive, but does not highlight the costs of not permitting hydrosulphite.

The Applicant believes that, by bleaching pāua, consumers will be more accepting of pāua, which may in turn lead to some economic benefits for New Zealand. However, the Applicant has not explained the extent to which 'unbleached' pāua is not considered acceptable. That is, the Applicant has not provided any certainty on what the costs of not bleaching pāua will be for New Zealand or what the economic benefits of bleaching pāua will be for New Zealand.

The Applicant explains some risks, yet these risks seem completely unnecessary when there are no benefits or opportunities provided in the application.

The Applicant has not provided evidence of considering alternative solutions to its so-called issue

Further to my previous reason above for opposing the application, as the extent of the benefits of gaining 'consumer acceptability' seems to be uncertain, yet the Applicant has highlighted the risks, it is concerning that the Applicant has not provided evidence of alternative, less risky solutions, other than to decline the application.

The Applicant has not included the cultural effects of including hydrosulphite as a food additive

Pāua is important to New Zealand culture. Although the Applicant has stated in media correspondence that bleaching pāua is intended for exportation, the application does not explicitly state that this pāua will not be supplied for domestic consumption. This deception is concerning as pāua is a taonga to New Zealanders in its natural state, that is, without additives. Changing the

¹ Section 1.2, page 3, *Call for Submissions - Application A1088*, Food Standards Australia New Zealand

appearance of pāua disregards the significance that New Zealanders associate to pāua. The Applicant has not documented how bleaching pāua will affect the acceptability of pāua to domestic consumers or, if bleaching pāua is indeed for exportation, what the precedent could be for the domestic supply of bleached pāua.

I request that this application be declined, unless:

- The Applicant explains what the actual benefits of including hydrosulphite as a food additive will be for the pāua industry and New Zealand
- The Applicant provides evidence of alternative options that considers the actual costs and benefits of including hydrosulphite as a food additive will be for pāua industry and New Zealand
- The Applicant provides analysis of the costs and risks of including hydrosulphite as a food additive on the acceptability of pāua to domestic consumers

Ngā mihi,

Hauauru