



Submission - FSANZ Proposal P1019
Carbon monoxide as a processing aid for fish
11 February 2013

Thank you for the opportunity to comment on the 'Carbon monoxide as a processing aid for fish' Proposal P1019.

1. This submission is made by Seafood New Zealand on behalf of the New Zealand commercial seafood industry.
2. Seafood New Zealand is the primary umbrella organisation representing the generic interests of the New Zealand seafood industry. Seafood New Zealand plays a leading role in developing and presenting the seafood industry's response on all generic legislative and regulatory proposals affecting the industry.
3. The proposal seeks to:
 - a) review Food Standards Code, to ensure it is clear that because carbon monoxide has an on-going technological function in fish, it is not permitted to be used as a processing aid;

Comments:

4. The New Zealand seafood industry is supportive of the proposal to provide clarity in Section 1.3.3 of the Food Standards Code, but provides the following comments.
5. Fish manufactured in New Zealand is not treated with carbon monoxide by direct application of the gas although we are aware that some imported fish may be treated in this manner.
6. As noted in the proposal discussion, carbon monoxide can be a component of wood smoke and therefore smoked fish may contain a small amount of carbon monoxide residue, this practice is not what is of concern. However, the wording proposed in the draft variation to the Food Code Standard 1.3.3, makes no mention of this.
7. Therefore with respect to providing further clarity in Section 1.3.3 of the Food Standards Code, it is suggested the proposed wording (of clause 3 (2)) be amended to clarify that it is the use of carbon monoxide by direct application of the gas that is not permitted in fish, an amended wording suggestion follows:

Standard 1.3.3, Clause 3 (2)

Carbon monoxide may be used as a processing aid in the course of manufacture of any food at a level necessary to achieve a function in the processing of that food, but is not permitted in fish by direct application of the gas.

8. Again thank you for this opportunity to provide these comments.

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