

Submission

Application Number:

Application A1088

Sodium Hydrosulphite as a Food Additive

Me:

Te Hau Paeroa Hona

[REDACTED]
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Tēnā Koutou

This submission is to **oppose** the application made by Seafood New Zealand Limited to allow the use of sodium hydrosulphite in canned pāua. The application was to allow Seafood New Zealand Limited (the Applicant) to “bleach the natural black colour of the native New Zealand abalone to a more consumer-acceptable colour”¹.

I oppose the submission for the following reasons:

- The risks in using hydrosulphites as a food additive has been highlighted by the Applicant, but has failed to highlight the cost of not allowing hydrosulphites.
- There is no evidence of consideration for any alternative solution.
- The Applicant has not given any consideration to cultural significance of pāua.

I provide further explanation of these reasons:

The risks in using hydrosulphites as a food additive has been highlighted by the Applicant, but has failed to highlight the cost of not allowing hydrosulphites.

The Applicant believes that “consumers have an expectation of an acceptable colour...”² Therefore the Applicant thinks that, by bleaching pāua, it may lead to more economic benefits for NZ. However, the Applicant has not provided any evidence to support this claim. Furthermore, the Applicant has failed to provide any evidence of why ‘unbleached’ pāua is considered unacceptable. There has been no costing’s of what non-bleached pāua will be for NZ or the economic benefits that bleaching pāua will provide for NZ.

The Applicant has outlined risks, but these risks are circumstantial as there has been no evidence to support this.

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

² Option 1, page 7, *Call for Submissions - Application A1088*, Prepare draft variation to Standards 1.2.4 and 1.3.1.

There is no evidence of consideration for any alternative solution to their issue.

To add on reasons stated above, the Applicant has not shown any consideration to an alternative solution to using 'sodium hydrosulphite', a less risky solution.

The Applicant has no given any consideration to cultural significance of pāua.

Pāua is a national icon for NZ and also a native food to NZ. Because it is a native food, it is significant to the Māori people, but more so to New Zealanders. To change the colour of pāua is to change its identity. To change its identity is to take away its mana (prestige) and its significance to Māori and to NZ. Pāua is dark by nature and should not be altered. Abalone is lighter in colour, so why not farm that.

Furthermore, the applicant had stated in the media correspondence that the 'bleached pāua' is for exportation, but did not say that this product would not be sold domestically. Altering Standards to fit processes for overseas consumption is one thing, but it is concerning to think that this could be sold domestically. Has there been any consideration for the people of NZ and how we may feel about our native food being bleached and changed? By allowing this could open the flood gates.

This could set a precedent for all foods imported and/or exported to and from NZ.

I request that this application be declined, until such a time significant consideration has been given towards these issues, along with supporting evidence.

Tēnā Koutou

Te Hau Paeroa Hona