

Australian Food and Grocery Council SUBMISSION

FEBRUARY 2013

TO:
FOOD STANDARDS AUSTRALIA NEW ZEALAND

IN RESPONSE TO:
PROPOSAL 1019 – CARBON MONOXIDE AS A
PROCESSING AID FOR FISH

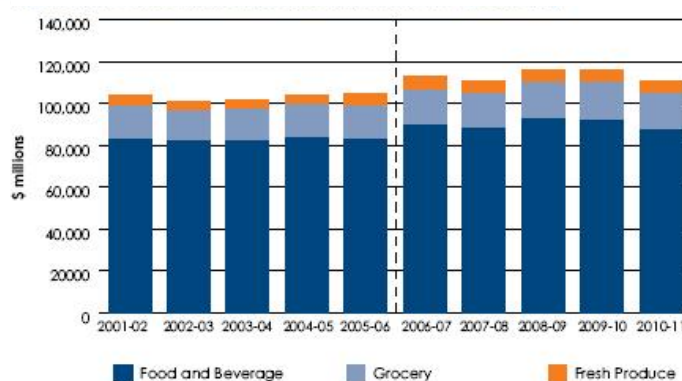


Australian Food and Grocery Council

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry.

The membership of AFGC comprises more than 150 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors.

Figure 1. Composition of the industry's turnover (\$2010-11)



Source: Based on ABS, catalogue number 8221.0 and 8159.0

With an annual turnover in the 2010-11 financial year of \$110 billion, Australia's food and grocery manufacturing industry makes a substantial contribution to the Australian economy and is vital to the nation's future prosperity.

Manufacturing of food, beverages and groceries in the fast moving consumer goods sector¹ is Australia's largest manufacturing industry. Representing 28 per cent of total manufacturing turnover, the sector the second largest industry behind the Australian mining sector and accounts for over one quarter of the total manufacturing industry in Australia.

This diverse and sustainable industry is made up of over 22,600 businesses and accounts for over \$49 billion of the nation's international trade. These businesses range from some of the largest globally significant multinational companies to small and medium enterprises. The industry spends \$466.7 million a year on research and development.

The food and grocery manufacturing sector employs more than 296,300 Australians, representing about 3 per cent of all employed people in Australia, paying around \$11.3 billion a year in salaries and wages.

Many food manufacturing plants are located outside the metropolitan regions. The industry makes a large contribution to rural and regional Australia economies, with almost half of the total persons employed being in rural and regional Australia². It is essential for the economic and social development of Australia, and particularly rural and regional Australia, that the magnitude, significance and contribution of this industry is recognised and factored into the Government's economic, industrial and trade policies.

Australians and our political leaders overwhelmingly want a local, value-adding food and grocery manufacturing sector.

¹ Fast moving consumer goods includes all products bought almost daily by Australians through retail outlets including food, beverages, toiletries, cosmetics, household cleaning items etc.

² About Australia: www.dfat.gov.au

1. INTRODUCTION

AFGC welcomes the opportunity to make this submission to Food Standards Australia New Zealand (FSANZ) in response to the call for submissions for Proposal 1019 – *Carbon monoxide as a processing aid for fish*.

AFGC notes this proposal seeks to amend the Table to Clause 3 of Standard 1.3.3 of the *Australia New Zealand Food Standards Code* (the Code) to remove the permission for carbon monoxide (CO) as a processing aid for fish.

2. AFGC POSITION

The AFGC **supports** clarification of the permissions for use of CO in the food processing industry, and seafood processing in particular.

The AFGC **supports** the proposed draft variation to remove the permission for CO as a processing aid for fish.

Notwithstanding this support, AFGC request further consideration is given to the regulatory management of applications of CO in fish processing – for example, smoking and modified atmosphere packaging (MAP) where residual levels of CO may be present in the final product.

3. SPECIFIC COMMENTS

AFGC supports the endeavours of FSANZ to protect consumers from misleading and deceptive practices and recognises that CO has the potential, when abused, to produce an appearance of freshness that may deceive the consumer.

AFGC understands the context of the proposal relates to the use of CO gas directly and it is recognised that wood smoke naturally contains some CO; however Australian and New Zealand regulators have considered that smoking tuna is effectively regulated by the Code³. CO is a legitimate and naturally occurring by-product of smoking.

AFGC is aware of technologies that involve modified atmosphere packaging (MAP) of seafood and the gas mixtures in use may contain background levels of CO as expected in natural atmosphere. The presence of CO in this instance is legitimate and not part of the technical process designed to extend product shelf life. Gasses normally used for MAP are carbon dioxide and nitrogen.

AFGC notes that residual CO from a legitimate smoking application to fish or where the product has subsequently been subject to MAP may render the product non-compliant. This should not be the case as both the smoking and MAP processes are separate actions.

AFGC requests consideration is given to setting a residual level for CO in fish that has been smoked or packaged using MAP technology. It is important that there is clarity around the permission for the presence of CO and the levels permitted to ensure that consumer safety is protected and opportunities for innovation are not impacted.

³ Section 3.1.1, p4 of the Calls for Submission document

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Australian Food and Grocery Council

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- Christie Tea Pty Ltd
- Church & Dwight (Australia) Pty Ltd
- Clorox Australia Pty Ltd
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- Coca-Cola South Pacific Pty Ltd
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- Danisco Australia Pty Ltd
- Devro Pty Ltd
- DSM Food Specialties Australia Pty Ltd
- Eagle Boys Pizza
- Earlee Products Pty Ltd
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- Ferrero Australia Pty Ltd
- Fibrisol Service Australia Pty Ltd
- Fonterra Australia Pty Ltd
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- FPM Cereal Milling Systems Pty Ltd
- Freedom Foods Group
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- General Mills Australia Pty Ltd
- George Weston Foods Ltd
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- Goodman Fielder Limited
- H.J. Heinz Company Australia Limited
- Harvest FreshCuts Pty Ltd
- Healthy Snacks Australia Pty Ltd
- Hoyt Food Manufacturing Industries Pty Ltd
- Hungry Jack's Australia
- Igea Group
- Jalna Dairy Foods Pty Ltd
- JBS Australia Pty Limited
- Jireh International Pty Ltd
- Johnson & Johnson Pacific Pty Ltd
- Kellogg (Aust) Pty Ltd
- Kerry Ingredients Australia Pty Ltd
- Kimberly-Clark Australia Pty Ltd
- Kitchens of Sara Lee
- Kraft Foods Limited
- Laucke Flour Mills Pty Ltd
- Lindt & Sprungli Australia
- Lion Dairy and Drinks Pty Ltd
- Madura Tea Estates
- Manildra Harwood Sugars
- Mars Chocolate
- McCain Foods (Aust) Pty Ltd
- McCormick Foods Australia Pty Ltd
- McDonald's Australia Ltd
- Merisant Australia Pty Ltd
- Metarom Australia P/L
- Mrs Mac's Pty Ltd
- Murray Goulburn Co-operative Co Ltd
- Myosyn Industries Pty Ltd
- Nerada Tea Pty Ltd
- Nestle Australia Ltd
- Nutricia Australia Pty Ltd
- Ocean Spray International, Inc
- Only Organic 2003 Pty Limited
- Parmalat Australia Ltd
- Patties Foods Ltd
- Pfizer Consumer Healthcare
- Popina (Vic) Pty Ltd
- Procter & Gamble Australia Pty Ltd
- QSR Holdings
- Queen Fine Foods Pty Ltd
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- Red Bull Australia Pty Limited
- Rosella Foods Pty Ltd
- Sandhurst Fine Foods Australia
- Sanitarium Health and Wellbeing Company
- SC Johnson & Son Pty Ltd
- SCA Hygiene Australasia Pty Ltd
- Sensient Technologies (Australia) Pty Ltd
- Simplot Australia Pty Ltd
- Solaris Paper Pty Ltd
- Spicemasters Australia Pty Ltd
- Steric Pty Ltd
- Stuart Alexander & Co Pty Ltd
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- Sugar Australia Pty Ltd
- SunRice
- Swisse Vitamins Pty Ltd
- Tasmanian Flour Mills Pty Ltd
- Tate & Lyle ANZ Pty Ltd
- The Smith's Snackfood Company
- The Vege Chip Company
- The Wrigley Company Pty Limited
- Tixana Pty Limited
- Unilever Australasia
- Vital Health Foods (Australia) Pty Ltd
- Ward McKenzie Pty Ltd
- Yakult Australia Pty Ltd
- Yum! Restaurants Australia Pty Ltd
- Australian Pork Limited
- Baker & McKenzie
- Benchmarking for Performance(B4P)
- Bizcaps Pty Ltd
- Brisbane Marketing
- CHEP Asia - Pacific
- CROSSMARK Asia Pacific
- CSIRO Food and Nutritional Sciences
- Dairy Australia
- Ettlin International Pty Ltd
- Food Allergen Control Training Analysis(FACTa)
- Food Liaison Pty Ltd
- Foodbank Australia Ltd
- Grain Growers Ltd
- Grant Thornton
- GS1 Australia Ltd
- IBM Australia Ltd
- Invest Queensland
- King & Wood Mallesons
- KPMG
- Legal Finesse
- Linfox Australia Pty Ltd
- Logan City Council
- Meat and Livestock Australia
- Monsanto Australia Ltd
- New Zealand Trade and Enterprise
- Pacific Strategy Partners
- PINCHme Australia Pty Ltd
- Red Rock Consulting
- Rentokil Initial Pty Ltd (Rentokil Pest Control)
- RQA Product Risk Institute
- S A Partners LLP
- Simons Green Energy Pty Ltd
- Six Degrees Executive Pty Ltd
- Spectrum Automation
- StayinFront Group Australia
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- Swire Cold Storage
- Swisslog Australia Pty Ltd
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- Touchstone Consulting Australia Pty Ltd
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- Baking Associations Australia
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- Foodservice Suppliers Association of Australia
- Grains & Legumes Nutrition Council
- Private Label Manufacturers Association Australia/New Zealand



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