



SOUTH AUSTRALIAN DRIED TREE FRUITS ASSOCIATION

SUBMISSION

PROPOSAL P298

BENZOATE AND SULPHITE PERMISSIONS IN FOOD

INTRODUCTION

This submission to Proposal P298 – Benzoate And Sulphite Permissions In Food is made on behalf of the South Australian Dried Tree Fruits Association. SADTFA is an association comprising Growers, Packers and Marketers of dried tree fruits (predominantly Dried Apricots), and is considered the Peak Body for the industry.

The matter of Sulphite permissions, particularly the possibility of reduction of the maximum permissible levels in dried fruits, is of significant concern to our Association. We truly believe that a reduction of the permissible level (currently 3,000ppm) would cause major financial problems to an industry that is also facing competition from cheap (and we would purport) less controlled imports.

The industry in Southern Australia currently comprises some 450 growers and generates an estimated value of \$20 million for the rural economy. The industry has in place a well organized and operated 'Approved Supplier Program' to address matters such as agricultural chemical residues in fruit, and until the recent de-regulation of the industry, a very high degree of control of the Sulphite levels in the product available to the general consumer. It must be said that the vast majority of the Australian-produced dried fruit sold in this country is still well controlled, however, we do not believe that the same can be said for small quantities sold directly to the public at venues such as local markets.

Without going into exhaustive details, we believe that the dynamics of our industry are significantly different to those found in nearly all other processed food industries, and certainly other products mentioned in this proposal, thus:

1. Supermarkets (the major source of dried fruits for the general consumer) categorize the product as a 'dry grocery' item, and hence require a minimum of 6 months shelf life on the products when they receive them. *(Given the short harvest and drying period of the product, dried fruits must be stored in optimum condition for extended periods of time.)*
2. Extensive market research indicates that the four primary customer considerations in purchasing dried fruits are colour (brightness), texture (softness), size and sweetness. *(Hence colour and the size of the pieces of fruit are the predominant drivers in the economics of the industry, and the colour must be maintained during extended storage times.)*
3. Currently, there is only one large commercial operation dedicated to the specific purpose of fruit drying. The majority of fruit is dried by independent growers.
4. Sulphites are used as anti-oxidants in the drying process for the purpose of colour retention. To the best of our knowledge, these are the only effective preservatives for doing this in the context of our industry. *(Other compounds can be used for microbiological control, but not for colour retention as well.)*

5. Extensive research has been undertaken (by *PIRSA Post Harvest Horticulture and CSIRO*) to show that seasonal conditions, fruit maturity and exposure to sunlight are the major factors influencing the final colour of the dried fruit. We believe that it is the current practice within the Dried Fruit Industry for Packers to try to attain a level of 2,500ppm for the fruit in their retail packs. It should be noted however, that over the full 3 – 4 month term of the harvest, there are seasonal, varietal, weather and fruit maturity factors which can each impact independently on batches of fruit processed during the harvest period. These factors all contribute to variances in Sulphite levels when the fruit is delivered to the Packers, and also to the way that the Sulphite is retained within the fruit during storage and processing. It is our contention, that even though the target for the packaged fruit is 2500ppm, a tolerance up to a level of 3,000ppm is required to ensure that the retail fruit remains within the allowable levels.
6. One other very important point to note is the way in which the sulphites are in fact used in the process of drying fruit. Unlike cordials and sausages, where the sulphites would be added as a measured ingredient (or additive) in one of the last processing steps, for dried fruits, the sulphite is added as sulphur dioxide gas (usually from burning solid sulphur) by the growers prior to the drying of the fruit. This is far less 'controllable' than a strict measured dose, and for the reasons outlined in Point 5 (above), the uptake (and retention) of sulphites in the fruit is highly variable.
7. During the last fruit season, an approximate price paid to growers by the packers was about \$7,000 per tonne (variable of course with the quality of the fruit). A approximation of the cost to the industry for the case of a reduction in the permissible level of sulphite in dried apricots to 2,000ppm is as follows:

Additional Cold storage	\$200 per tonne
Reduction in storage moisture (of fruit)	\$400 per tonne
Loss of quality (due to discolouration)	\$370 per tonne

Total cost Approx \$1,000 per tonne.

Due to the market pressures from cheaper imported product, we do not believe that this additional cost could be recovered from the marketplace, and hence would ultimately be carried by the industry. We do not believe that the Australian industry could survive this additional cost.

TO ADDRESS SPECIFIC ISSUES RAISED BY FSANZ.

Item 5.2 Dietary exposure.

(a) Changes since April – May 2003.

To the best of our knowledge, little has changed since this period. The only significant change to the market has been the increase in use of imported fruit, and the emergence of China as being a major supplier in Australia.

(b), (c) and (d) Market Share, Category proportion etc.

Sulphites are almost universally used as preservatives in dried apricots. There is a small market for (predominantly 'organic') apricots dried without the use of Sulphites, however, we would estimate this to be much less than 5% of the market.

(f) Maximum permissible level used.

See note 5 above. Natural variances in the composition of a batch of fruit for processing mean that in effect the product is packed to the maximum permissible level of sulphites.

(g) Use of multiple preservatives.

We do not believe that this is an option for dried apricots, and such mixtures are not used.

(h) Analytical data of consumable products.

We do not currently have this data at our disposal, however, reputable packers do test all batches of consumer product to ensure legality. Such data is readily obtainable.

(i) Changes in Sulphite levels during storage.

There is much published data on this subject. See note above and attached CSIRO paper. The CSIRO paper is somewhat dated, however, the basic food chemistry of the product does not alter, and we believe that this particular paper and its conclusions are still very relevant, and possibly the best synopsis of a number of other research papers on similar subjects. *(We will not include copies of other papers at this initial stage, suffice to say that they are available, and would appreciate further discussion on the matter at an appropriate point in the future)*

Item 5.3 Technological justification for using sulphites.

As per the attached CSIRO paper, it is our belief that the current 3,000ppm permissible maximum is the required level to maintain an efficient and cost-effective industry for all parties involved. Below this, the product shelf life and hence the viability of the industry would be highly questionable.

To the best of our knowledge, there are no alternatives to the use of Sulphites in dried apricots.

Item 7 Regulatory and Non-Regulatory options.

From the previous discussions, it is obvious that the SA Dried Tree Fruit Association supports and advocates Option 1 – maintenance of the status quo for sulphite permissions in relation to dried tree fruits (apricots in particular), and we should always support the consumption of a balanced diet.

In relation to the assessment, we do have some concerns that there was no differentiation drawn between Australian and Imported dried apricots. There is strong evidence to suggest to us that controls of sulphite levels of imported dried apricots do, on a significant number of occasions, exceed the permissible Australian levels.

In terms of costs to the industry as a whole, the Packing companies are in a far stronger position to comment on this matter than the Association, and we believe that they are submitting a separate paper on the subject.

From a grower perspective, we believe that the economic position of the industry is such that the viability of the Australian industry is currently in a precarious position. Any impact on the existing farm income as a result of product down-grading, which would result from the reduction of Sulphite levels to 2000ppm, would simply destroy the Australian Industry.

We thank you for the opportunity to voice these comments and look forward to further discussions at a later stage in the process.

Attachment

Stability of Moist-Pack Apricots in Storage
CSIRO Food Preservatives Vol. 27 No. 2 (1967).