

## **Comments from the Victorian Departments of Environment & Primary Industries and Health**

### **Due date of submission – 27 June 2014**

The Victorian Departments of Environment & Primary Industries and Health (the departments) welcome the opportunity to provide comments on Application A1088 which seeks to amend the Food Standards Code (the Code) to permit the addition of Sodium Hydrosulphite as a bleaching agent in canned abalone.

The departments understand that seven sulphiting agents are already permitted in the Code to treat abalone, but that none of these are effective as bleaching agents; to bleach the black colour of the native New Zealand abalone to a commercially acceptable golden brown to nutmeg colour. The departments have no concerns with the proposed maximum permitted level of Sodium Hydrosulphite, which at 1000 mg/kg is the same as the current sulphite permissions for canned abalone in the Code.

However, clarification is sought from FSANZ as to the appropriate classification of this bleaching agent as a food additive. This application is made to amend Standard 1.3.1 – Food Additives. However, the application raises some questions about consistent approaches to classification of food additives and processing aids. We note that “bleaching agent” is not listed as either a class of additives in Schedule 1 of Standard 1.2.4 (labelling of ingredients), nor as having a technological function in Schedule 5 of Standard 1.3.1 (food additives). Moreover, permitted “bleaching, washing and peeling agents” that may be used in the course of manufacture of specified foods are listed in the table to Clause 12 of Standard 1.3.3 (processing aids).

The assessment report states that “treatment of abalone with sodium hydrosulphite occurs prior to canning”. The risk and technical assessment report provided indicates that the sodium hydrosulphite is decomposed with no residual sodium hydrosulphite remaining and no ongoing technological function as a bleaching agent. This indicates that this bleaching agent should, as is the case with other similar agents, be listed as a processing aid.

The issues identified in the application of the standards cited are significant, and should be addressed as it is important to take a consistent approach to the classification of food additives and processing aids.