

**Comments from Department of Health, Victoria**  
**Due date of submission: 11 February 2013**

The Victorian Department of Health (DH) welcomes the opportunity to provide comments on Proposal P1019 – Carbon monoxide (CO) as a processing aid for fish.

DH is aware that while there is a general permission for the use of CO as a processing aid in the course of manufacture of any food, there is no permission for its use as a food additive. DH is also aware that when CO is used to process high value, red-fleshed fish it has an ongoing technological function as a colour fixative. This means that the CO is acting as a food additive and not a processing aid. Using CO to maintain a bright red colour can disguise the age of fish and mask spoilage that may lead to histamine poisoning. DH recognises that the current wording in the Code with regard to treating fish with CO requires clarification to provide certainty that this practice is not permitted.

However, by specifically excluding fish from the permission to use CO as a processing aid, the proposed drafting creates uncertainty around the use of CO in the processing of red meats. DH suggests that FSANZ considers redrafting the provisions to address this issue.

DH is also concerned that issues around the use of so-called filtered or odourless smoke have not been addressed by FSANZ. The use of these products does not constitute traditional smoking, which imparts distinctive characteristics to a product and which can also have a preservative effect. It could be argued that these products are being used solely to fix colour where the use of 'pure' CO is prohibited.

DH requests that FSANZ gives further consideration to these issues.