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SUBMISSION REGARDING FSANZ PROPOSAL P298 BENZOATE AND SULPHITE PERMISSIONS IN FOOD

A. Preamble

This Submission is made in respect of the Food Standards Australia New Zealand Initial Assessment Report 5-05 issued on 3 August 2005.

B. Scope of this Submission

1. James Crisp Ltd does not handle any foods containing benzoate, and therefore no submissions are made regarding this additive.

2. James Crisp Ltd handles three categories of food containing sulphite:

    - Dried apricots
    - Dried potato flakes
    - Desiccated coconut

3. The present limit concentrations for sulphite, expressed as SO_2, in these commodities are

    - Apricots 3000mg/kg (ppm)
    - Potato flakes (dried vegetables) 3000mg/kg
    - Coconut 50mg/kg

C. Comments on the above three items:

1. Apricots:

Sulphur dioxide is introduced into apricots as the gas. Experience has shown that a relatively high concentration of sulphite as SO_2 is essential in order to provide good quality dried apricots with normal colour, and to provide for a shelf life under good storage conditions of 12 months (the usual requirement in this type of trade). Historically, when apricots were imported subject to a limit of 2000mg/kg difficulties were encountered.

However James Crisp Ltd is cognisant of the fact that SO_2 in dried apricots represents a significant source of sulphite ingestion, especially by childen, and therefore (subject to the **Proposed Arrangement** set out below) would not oppose a move to reduce the permitted concentration to 2000mg/kg, thus conforming to the EU limit for this commodity.

2. Potato Flakes:

The potato flakes imported by James Crisp Ltd contain sulphite (added in the form of sodium metabisulphite) at a concentration within the range 200~400mg/kg expressed as SO_2.

This is substantially below the present permitted limit, and James Crisp Ltd would not oppose a substantial reduction in the permitted limit, to, say, 1000mg/kg.

3. Desiccated Coconut:

The desiccated coconut imported by James Crisp Ltd contains sulphite (added in the form of sodium metabisulphite) at a concentration not exceeding 50mg/kg expressed as SO_2.

The present limit of 50mg/kg is the lowest possible concentration of sulphite which allows for the supply into New Zealand of good quality desiccated coconut with an acceptable shelf life (12 months from date of packing).

Experience has shown that coconut free from sulphite, or at a lesser concentration than 50mg/kg, discolours badly and is quite unacceptable for both food manufacturers and consumers.

James Crisp Ltd seeks to have the present limit maintained.

C. Proposed Arrangement:

The imposition of fixed numerical limits on sulphite in food raises some serious practical difficulties, especially when – as with dried apricots – the sulphite is added as a gas.

Furthermore, sulphites are somewhat unstable compounds, subject to oxidation to sulphate (an ion with nil preservative activity and effectively nil toxicity.) This progressive natural reduction in the concentration of sulphite requires that the

concentration of sulphite at time of packing in the exporting country for shipment to the FSANZ Region be at or about the permitted limit. This applies to both apricots and coconut.

James Crisp Ltd would suggest strongly that FSANZ recognise this practical issue, and agree to a "tolerance" amount, to be applied should the sulphite in a particular sample or shipment be found to exceed the limit.

Thus in proposing a significant reduction of sulphite in apricots, and maintaining the low concentration in coconut, James Crisp Ltd suggests that these figures be regarded as targets not to be exceeded, but that occasional non-compliance to a restricted extent be tolerated and not call for rejection of the food. This will allow manufacturers to add sulphite in the required amount, without having to reduce the concentration to ensure nil non-compliance at all times.

Variability of sampling should also be taken into account, especially in the case of apricots (and any other foods) treated by means of SO_2 as a gas.

Proposal

1. That if the limit for sulphite in apricots is reduced, to, say, 2000mg/kg a tolerance of 20% be permitted, equating 400mg/kg, to apply so long as there has been a history of substantial compliance.

2. That there be a similar tolerance (20% of the limit) for foods containing very low levels of sulphite, such as 50mg/kg in the case of desiccated coconut.

James Crisp Ltd
[redacted]
Managing Director