

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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**Agenda Item 2**

**CX/FFP 00/2-Add.4**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS**

Twenty-fourth Session  
Ålesund, Norway, 5-9 June 2000

#### **MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES**

##### **LABELLING OF FISH STICKS – COMMENTS**

### **THAILAND**

#### **Agenda Item 2 : Labelling of Fish Sticks (CX/FFP 00/2-Add.2)**

Referring to the proposal to use “Fish content” instead of “Fish core” content in the labelling of Codex Standard for frozen breaded or batter fish stick and the determination of fish content by chemical analysis instead of AOAC 971.13(15<sup>th</sup> edition) , Thailand is of the following opinion : -

- 1.) The labelling of “Fish core” content is a acceptable requirement which could serve as an informed choice for consumers and as consumer protection. Fish core could include fish flesh or minced fish and food additives if it is used at the acceptable level according to the standard such as polyphosphate for water retention purpose.
- 2.) We do not agree with the proposal to specify “fish content” in CODEX STAN 165-1989 Standard for quick frozen fish block .
- 3.) We can not support the use of chemical method for protein determination because of the analysis of nitrogen factor to be involved with GMP is rather complicated. Water is used in fishery production for cleaning and reducing microbial lodge of raw material according to the processing steps of each manufacture. However available Codex recommendation for GMP of fishery manufacture to reduce the loss of soluble protein and water absorption and there is no existing international guideline which could be followed presently. Moreover, The diversity of nitrogen factors could be expected even in the same kind of fish itself due to the seasonal variation.

### **EUROPEAN COMMUNITY**

The European Community supports the proposals made in the document prepared by the United Kingdom. However the European Community considers that it is necessary to include other species in the tables 1 and 2. Therefore the European Community suggests developing the tables on the grounds of the results obtained from experiences made by countries on the measurement of the nitrogen. The table should list all important species in international trade of fish sticks.