

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel.: 57051 Telex: 625825-625853 FAO I Facsimile: 39.06.570.54593 Email:codex@fao.org

Agenda Item 5

CX/FFP 00/5

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

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

DRAFT STANDARD FOR DRIED SALTED ANCHOVIES GOVERNMENT COMMENTS AT STEP 6 (Canada, Malaysia, Poland)

CANADA

General Comments:

Canada has reservations regarding the general approach of this draft standard because it deviates from the existing Codex commodity standards and is of the view that amendments are required.

Further to paragraph 75 of the report of the 23rd Session of the CCFPP¹, where the Delegation of Germany noted that several sections (*definition of defectives, reference to odour and flavour and sensory examination*) which were usually found in fish standards, were missing, Canada would like to include the following sections for elaboration in this standard:

- The criteria used to determine the acceptance of a lot to this standard needs to be undertaken. It is recommended that the approach taken by existing Codex commodity standards, be considered and a “**Lot Acceptance**” section be added.
 - To help strengthen Section 2 - Description, elaborating on the requirements for the commercial presentation of this product is recommended. It is suggested that the approach taken by existing Codex commodity standards, be considered and a “**Presentation**” section be appended
 - A “**Food Additives**” section needs to be elaborated and should follow a format similar to existing Codex commodity standards.
- 3 The placement of Section 3.3 - Breakage and Section 3.5 - Size Classification in the text and the labelling requirement stipulated in Section 6.2 - Grade and Size of Product, does not completely correspond with the decision of the Committee as set out in paragraph 70 of Alinorm 99/18. Canada also recalled that optional requirements from existing standards and standards under development are being incorporated as an Appendix in the revised Code of Practice for Fish and Fishery Products (under development).

¹Alinorm 99/18

The CCFFP is revising the Code of Practice for Fish and Fishery Products which takes into consideration, the Recommended International Code of Practice for Fresh Fish (CAC/RCP 9-1976) and the Recommended International Code of Practice for Salted Fish (CAC/RCP 26-1979) and Canada is of the opinion that the reference to the revised Code of Practice will need to be updated in the future.

Specific Comments:

Section 1 - Scope

Canada would like clarification concerning the intended use of this product, whether it is offered for direct consumption and/or further processing. Specifying the intended use of this product in the scope could help improve clarity.

Section 2.2 - Process Definition

Canada would like clarification on the definition of the “*washing*” process because it appears that the outcome of this process will directly influence product compliance with the criteria set out in Section 3.2.2, Table 1: Requirements for Dried Salted Anchovies. Canada would favour further elaboration of “*washing*” process, which would take into consideration, the concentration of the “salt water” and the contact time of the “salt water” and fish.

Canada would like clarification for the definition of “*salt water*.” Canada would support the elaboration of a definition that would describe its hygienic requirements because there may be specific concerns with the use of sea water OR a salt solution made from mixing salt with fresh water, both of which may have the potential to contain substances which can be a threat to human health.

Section 3.2.1 - Final Product

The general approach of this section is different than the approach taken by existing Codex commodity standards where the criteria and references to methods of analysis, definition of defects and lot acceptance are described.

Section 4 - Hygiene

For consistency with existing Codex commodity standards and to reflect the proper handling practices described in subsections 4.1, it is recommended that the title of Section 4 should be amended to “**Hygiene and Handling.**”

Section 4.2

The term “*objectionable matter*” could imply foreign material which is aesthetically offensive and not necessarily of public health significance. It is recommended that since the issue of “objectionable matter” was addressed in the Hygiene section of this draft standard, it should be qualified appropriately. A suggested wording from existing Codex commodity standards could be as follows: “From the extent possible in good manufacturing practice, the **final product shall be free from an foreign material that poses a threat to human health.**”

Section 4.3

Canada is of the opinion that within the context of a Codex standard, methods of analysis sanctioned by the Codex Alimentarius Commission should be the standardized method used for analysis. Suggested wording could be similar to existing Codex commodity standards as follows: “When tested by appropriate methods of sampling and examination **prescribed by the Codex Alimentarius Commission (CAC)**, the product:”.

The hygienic requirements for substances in this product which were not derived from microorganisms and has the potential to pose a threat to human health, should be emphasized. A similar requirement from

existing Codex commodity standards could be appended to this section as follows: “**Shall not contain any other substances in amounts which may present a hazard to health in accordance with standards established by the CAC.**”

Section 4.3 (a) and (c)

In some instances, standards for microorganisms and substances originating from microorganisms (e.g. histamine) have been established by the Codex Alimentarius Commission and should be identified in this subsection. Suggested wording could be similar to existing Codex commodity standards as follows: “shall . . . in amounts which may represent a hazard to health **in accordance with standards established by the CAC.**”

Section 6.3 - Scientific and Common Names

Canada strongly supports the mandatory labelling of the common name of the fish only.

Section 6.4 - Additional Requirements

Canada is of the view that storage instructions and cooking instructions are two separate issues and for clarity, they should be dealt with as independent subsections.

Section 7.1 - Sampling

A numerical reference to the “Codex Sampling Plan for Prepackaged Foods” should be appended as follows: “**Codex Sampling Plan for Prepackaged Foods (AQL - 6.5)(CAC/RM 42-1969).**”

Section 7.4 - Determination of Acid Insoluble Ash

Canada would like clarification on why the determination of acid insoluble ash is necessary for this product.

MALAYSIA

2. DESCRIPTION

2.2 PROCESS DEFINITION

In view of Malaysia’s concern on health hazard associated with fish of length greater than 6.5cm not gutted before processing, Malaysia would like to propose the process definition in Section 2.2 be amended to include the gutting of fish. Therefore, Section 2.2 should read as follows:

“ The product shall be prepared by either washing fresh fish in salt water and drying or washing followed by boiling in salt water and drying. Gutting may be necessary for fish of length greater than 6.5 cm. The drying process shall mean sun drying or artificial drying.”

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

Malaysia agrees with the decision taken at the 23rd Session of the Codex Committee on Fish and Fishery Products to move sections 3.3, 3.4 and 3.5 pertaining to Breakage, Size Classification and Grading to Annex A.

3.5 SIZE CLASSIFICATION

Malaysia is of the opinion that size declaration shall include both the size designation (small, medium or big) and length of the fish. Size designation is a quality guideline and, therefore, is important to protect consumer interest and to facilitate trading.

5. PACKING

In response to the question by the Delegation of Thailand on the need for transparent packaging material, Malaysia is of the view that the use of transparent packaging material would enable consumers to view the product quality at the time of purchase. In view of the effect of transparent packaging material on the product quality as a result of lipid oxidation reactions being initiated by light, Malaysia proposes Section 5.1 to be amended as follows:

“5.1 The product shall be packed in a suitable packaging material which is moisture proof, gas impermeable and light impermeable. The package shall have an appropriately sized transparent window at the back of the package.”

The inclusion of a transparent window will enable consumers to view the product quality (breakage, colour, and any other visible quality attributes) at the time of purchase. When the packages are stacked on the shelves for sale, the transparent window will be at the back of the package, and therefore, the product will not be exposed to light.

6. LABELLING

Malaysia proposes that the preamble of this section be amended to replace “CODEX STAN 1-1985” with “CODEX STAN 1-1985 (Rev. 1-1991)”.

Therefore, the provision for the country of origin is included for consumer protection.

6.3 SCIENTIFIC AND COMMON NAMES

Malaysia would like to maintain the current statement for consumer information as follows:

“The scientific and common names of the fish shall be declared.”

7. SAMPLING AND ANALYSIS

7.4 DETERMINATION OF ACID INSOLUBLE ASH

Malaysia would like to amend this section as advised by the Committee on Methods of Analysis and Sampling. Therefore, section 7.4 should read as follows:

“According to AOAC 938.08.”

7.5 DETERMINATION OF HISTAMINE

Malaysia proposes the inclusion of a new section 7.5 Determination of Histamine, in view that histamine levels were included in section 3.4 and section 4.3(d) at the 23rd Session of the Codex Committee on Fish and Fishery Products. Therefore section 7.5 should read as follows:

“ 7.5 DETERMINATION OF HISTAMINE

According to AOAC 954.04 (16th edition, 1995).”

POLAND

Appendix IV Draft Standard for Dried Salted Anchovies

We propose to set up limits for chemical contaminants especially for heavy metals which are harmful to health