

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Second Session

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PROPOSED DRAFT CODE OF PRACTICE FOR THE REDUCTION OF CONTAMINATION OF FOOD WITH POLYCYCLIC AROMATIC HYDROCARBONS (PAH) FROM SMOKING AND DIRECT DRYING PROCESSES

(N07-2006)

Comments at Step 3 submitted by Cuba and EC

CUBA

Cuba considers the document to be very useful and has no further comments.

EC

The European Community and its Member States (ECMS) welcome the Code of Practice for the reduction of contamination of food with polycyclic aromatic hydrocarbons from smoking and direct drying processes.

The ECMS are of the opinion that the Code of Practice will provide very useful guidance to producers and support its advancement in the Codex procedure.

In some parts of the Code of Practice, the readability could be improved. Some suggestions are provided here below:

General comments:

In order to make the Code of Practice as short and concise as possible, some suggestions to delete some paragraphs or parts of the paragraphs are given under the specific comments.

Furthermore specific reference to HACCP should be avoided throughout the document as the Code of Practice should also be directed to producers who have limited capacities to implement a full HACCP system.

As it has been agreed during the discussions on the Codex Code of Practice on smoked fish which is under elaboration, to replace the term "wood" as burning material by the more general term "plant material" it would be appropriate to take this into account in this Code by referring to "wood and other plant material" instead of "wood". Cocoa shells are an example of other plant material used as burning material for smoking.

Specific comments:

In order to remove some redundancies in the text of the Annex the following is proposed:

- Paragraphs 47, 49, 53, 64, 67 of Annex I should be deleted as they are repeated in paragraphs 68 – 72 (Code of Practice for production of smoked food).

- Similarly, paragraph 78 (second part with the title "sun drying process and critical control points"), paragraph 84 (second part with the title "fuel used in the process and some critical control points"), paragraph 85 (second part with the title "The combustion gasses developed and used....."), paragraph 87 (second part with the title "The foodstuffs dried and critical control points are") and paragraph 95 (second part with the title "The drying process and critical control points") should be deleted as they are repeated in the Code of Practice for direct drying on p. 14.

Chapter "Background":

§3, second line: replace "and as some PAH are genotoxic" by "and that some PAH are genotoxic".

Chapter "Introduction":

§5, 4th sentence: insert the underlined words: "In the EU, benzo(a)pyrene is used as a marker for the occurrence and effects of PAH in food; however the suitability of benzo(a)pyrene as a marker is currently under review by the European Food Safety Authority."

§ 14 should be deleted as it is irrelevant for this Code of Practice on PAH.

§§ 29 and 30: see general comments as regards reference to HACCP.

The chapter entitled "Recommendation for good manufacturing practices for the smoking process" on p. 7 could be renamed into "Good manufacturing practices for the production of smoked food" as it is proposed to give clear recommendations only in the subsequent chapter with the Code of Practice for smoked food (p. 10).

The background information of this chapter should be shortened and §§ 47, 49, 53, 64 and 67 deleted as proposed in the general comments.

§ 37: The following modifications are proposed:

- to replace point c by the following (proposed modifications underlined). The term regenerated smoke is the term which is also used in the Code of Practice on smoked fish which is under elaboration.

Smoke generation process in relation with the temperature of pyrolysis and with the airflow in case of smoke generator (friction, smouldering, auto-combustion, thermostated plates) or in relation with other methods such as regenerated smoke (liquid smoke vaporisation and direct smoking)

- the following additional point j could be added:

j. Design of the smoking chamber and of the equipment used for smoke/air mixture (which influence the smoke density in the smoking chamber)

§ 45: the third sentence "The woods used for the production of primary products" is proposed to be replaced by "The woods used for smoking and the woods used for the production of primary products"

§ 55: Footnote 3 referring to smoke flavourings as an alternative to smoking should be deleted as it could give rise to misunderstandings. The use of smoke flavourings is merely to impart flavour on the foodstuff, but in contrast to smoking it has no preservative effect.

§ 56, point b: it is proposed to replace "around 40 °C" by "from 30 to 40 °C"

§ 59: it is appropriate verify if the ultraviolet radiation is an authorised technique.

§§ 63, (67- proposed to be deleted), 72 : when referring to the washing of smoked products reference should be made to the restriction as regards smoked fish and fishery products, which is mentioned in § 66

§ 69. It is proposed to replace point a by the following (proposed modifications underlined):

- a. The composition of the smoke depending of e.g. the type of wood, the amount of oxygen present and the temperature of pyrolysis and possibly the length of time for which the wood is burned

The chapter entitled "COP for production of smoked food, summary of the critical control points" (p. 10) could be renamed into "Code of Practice for the production of smoked food". Delete "summary on the critical control points" as this chapter should contain concrete advice and not just a summary of the critical points. See general comments reference to HACCP (first sentence under the title).

The chapter entitled "Recommendation for good manufacturing practices for direct drying" on p. 11 could be renamed into "Good manufacturing practices for direct drying" as it is proposed to give clear recommendations only in the subsequent chapter with the Code of Practice for direct drying (p. 14).

§ 78 (second part), § 84 (second part), § 85 (second part), § 87 (second part) and § 95 (second part) should be deleted as proposed in the general comments.

Replace the title before § 86 "The foodstuffs dried" with "Drying of foodstuffs".

Rename the title of the Code of Practice for direct drying (p. 14) into "Code of Practice for direct drying, except sun drying".

Appendix III, Table 1: the standard deviation given for smoked fish should be verified.

Appendix IV:

- In the box "smoking supplementary" point c should be aligned with the proposed modifications in § 37:
Smoke generation process in relation with the temperature of pyrolysis and with the airflow in case of smoke generator (friction, smouldering, auto-combustion, thermostated plates) or in relation with other methods such as regenerated smoke (liquid smoke vaporisation and direct smoking)
- The following sentence could be added in point i or as new point j:
"cleanliness and maintenance of equipment"
- In the box "post smoking process" the exception for fish and fishery products should be mentioned (see § 66)