

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

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Agenda Item 7

CX/FFP 00/7

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 SALTED ATLANTIC HERRING AND SALTED SPRATS GOVERNMENT COMMENTS AT STEP 6 (Canada, Poland)

CANADA

General Comments:

1. Canada generally support this document but recognize that the specific issues in this standard require further discussion by the Committee. In addition, a spell-check and numbering sequence of sub-section check should be verified (i.e. the numbering of subsections 7.6 and 8.1.3 was repeated).

Specific Comments:

Section 2.1 - Product Description

2. Because of the specific nature of this standard, Canada recommends that the terms “beheaded”, “nobbed” and “gibbed” should be defined.
3. The common association between herring and sprats in this standard may create some confusion regarding the identity of the product and therefore a distinction should be made in their description. A suggested requirement could be appended to this section as follows: “**The pack shall not contain a mixture of species.**”

Section 2.2.1 - Salting

4. A “salting” process which is aimed to achieve the desired effect (quality, etc) is generally accomplished by the strength and efficacy of the salting medium as a function of time and therefore considerations should also be given to address the duration of salting as part of the process. A suggested wording could be as follows: “Salting is the process . . . salt-solution of the appropriate concentration, **and maintained for an appropriate period of time.**”
5. Where a “salt-solution” is used during salting process, Canada is of the view that the water used to prepare the solution should be of a quality so that it does not pose a threat to human health. A suggested requirement could be appended as follows: “**If salting is performed with a salt-solution, the water used for the salt-solution shall be of potable quality. Standards for potability shall not be less than those contained in the latest edition of the WHO “International Guidelines for Drinking Water Quality.”**”

Section 3 - Essential Composition and Quality Factors

6. Canada recalled from existing commodity standards where the processing of fish belonging to the Clupeidae family of fishes was involved, the average histamine level found in the samples was used as an indicator of quality. Canada is of the view that it would be prudent to add a new section called **“Decomposition”** to Section 3 to address histamine as a quality indicator. A suggested wording from existing standards is as follows: **“The products shall not contain more than 10mg/100g of histamine based on the average of the sample unit tested.”**

Section 4 - Food Additives

7. Canada agrees with the names of the food additives being placed in square brackets in order to be prompted for discussion and welcome the opportunity to participate in the disposition of this matter by the Committee. The use of the following additives are not permitted in Canada at this time:

- * Sodium Nitrate
- * Tartic Acid
- * Sodium Benzoate (only 1000 ppm calculated as benzoic acid is allowed)
- * Glucoco-delta-lacton
- * Sorbate
- * Lactic Acid

Section 5 - Hygiene and Handling

Section 5.2 (iv)

8. In this subsection, the references to the method of treatment of living nematodes to Annex II and similarly, the determination of viability of nematodes to Annex I, are inaccurate. Canada would like to note that, for the method of treatment of living nematodes as outlined in the sentence, *“If living nematodes are present ... in Annex II,”* the proper reference is **Annex I**. Similarly, the determination of viability of nematodes as addressed in the sentence, *“Viability of nematodes ... to Annex I”*, was referenced in **Annex II**.
9. Canada is of the view that the order of the sentences could be adjusted and take into consideration that determination of viability of nematodes should be performed first and then if the presence of living nematodes are confirmed, a method of treatment of nematodes follows.

Section 6 - Labelling

10. Since the product can also be marketed for further processing, Canada is of the opinion that labelling provisions for non-retail containers should be included in this section and should require as a minimum, lot and manufacturer identification information . This labelling information may facilitate the traceability of the product in the event of a recall.
11. Consideration should be given to include the declaration of storage instructions on the label since storage temperature has been outlined as a hygienic requirement under Section 2.2.4: Process Definition - Storage Temperatures.

Section 7.1 (iii) - Sampling Plan

12. The reference to the “*Codex Sampling Plan for Prepackaged Foods (CAC/RM 42-1969)*” could be strengthened by appending the following “**(AQL 6.5)**”.

Section 8.1.3

14. Canada is of the view that “*living larvae of nematodes*” in this product poses a potential hazard for human health and therefore it would be more appropriate to move this issue from the defectives section into the “Hygiene and Handling” section of this standard.

Section 9(i)

15. Since more than one sampling plan has been stipulated in Section 7 - Sampling, Examination and Analysis, the current wording could be improved by reflecting these choices. Suggested wording could be as follows: “The total number of defectives . . . not exceed the acceptance number (c) of the **appropriate** sampling plan in Section 7.”

Section 9(ii)

16. Canada would also like to seek clarification on the need for the specificity of the 95% tolerance as this approach is generally different than the approach taken by existing Codex commodity standards, particularly those standards which include the determination of drained weight. Consideration should be given to use wording from existing Codex commodity standards which are as follows: “**the average net weight and the average drained weight where appropriate of all sample units examined is not less than the declared weight, and provided there is no unreasonable shortage in any individual container.**”

Section 9(iii)

17. Canada would like to seek clarification on the wording of this requirement. An omission may have occurred since it was recalled from the “Proposed Draft Standard for Salted Atlantic Herring (CX/FFP 98/11)” from the meeting of the 23rd Session of the CCFFP that the wording for this subsection was as follows: “Section 9 (iii) the total number of samples not meeting the form of presentation as defined in Section 2.3 does not exceed the acceptance number (c) of the **appropriate** sampling plan in Section 7.”

POLAND

Appendix VII Proposed Draft Standard for Salted Atlantic Herring

The Polish food legislation does not provide that sodium nitrate, tartaric acid and glucono-delta-lactone should be added to fish products:

- We accept only lactic acid in the fish products containing sour solution
- We suggest to set up requirements for contaminants especially for heavy metals which are harmful to health