

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 6

CX/FFP 05/27/7-Add.1

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Twenty-seventh Session
Cape Town, South Africa
28 February – 4 March 2005

PROPOSED DRAFT STANDARD FOR LIVE AND RAW BIVALVE MOLLUSCS GOVERNMENT COMMENTS AT STEP 3

CANADA

General Comments

Canada generally supports the approach of this standard but recognizes that there are fundamental issues which require further discussion by the Committee.

Canada recommends retaining the square brackets regarding the biotoxin provisions of this standard until the Committee has the opportunity to consider the report to be submitted by the Joint FAO/IOC/WHO ad hoc Expert Consultation on Biotoxins in Molluscan Bivalves.

Specific Comments

TITLE AND SCOPE

Delete square brackets around: “*and raw*”

Reason: Canada supports the scope and title of this standard to apply to “*live and raw bivalve molluscs*”. We have reservations regarding both the need and practical benefits for delineating between live and raw bivalve molluscs in the standard since these two products share very similar hygiene and handling requirements and other elements.

SECTION 2 - DESCRIPTION

Section 2.1 - Product Definition

Delete square brackets and revise to read: “Raw bivalve molluscs are products **which are marketed either in a frozen or fresh state and that are non-viable (i.e. no longer alive) because of immediately prior to consumption but were alive immediately prior to the commencement of processing or to shucking, freezing or other treatment that did not eliminate but that essentially retain** the sensory characteristics of live products.”

Reason: The Canadian proposal clarifies that raw bivalve molluscs encompass products that are commercially marketed in a fresh, but non-viable, state and frozen state. For example, shucked bivalve molluscs meat can be sold in both the fresh or frozen form.

Section 2.2 - Process Definition

Add as new paragraph: “**Fresh raw bivalve molluscs shall be derived from organisms which meet the requirements for live bivalve molluscs and the product shall, after any suitable preparation [deshelling], receive no preservation treatment other than chilling.**”

Reason: If the Committee accepts the Canadian proposal in the “Product Definition” section to include bivalve molluscs that are marketed in a fresh state, our proposal defines the process to obtain a raw fresh product.

Delete: *Paragraphs 3, 4, 5 and 6 (“Processed bivalve molluscs shall . . . Code of Practice.”)*

Reason: Canada notes that the inclusion of these provisions is inconsistent with the decision made at the 26th Session of the CCFFP which was to remove references containing wording in relation to processed products, especially canned products from the proposed Draft standards (Alinorm 04/27/18 para 123).

SECTION 3 - ESSENTIAL COMPOSITION AND QUALITY FACTORS

Section 3.1 - Live Bivalve Molluscs

2nd Paragraph

Revise to read: “Live bivalve molluscs must respond adequately to percussion ~~and must contain a normal quantity of intravalvular fluid~~ as determined by product specialists familiar with the species.”

Reason: Canada recommends deleting the assessment for viability based on “*normal amounts of intravalvular liquid*” since this criterion is subjective in nature. Our proposal would align this provision to be consistent with the definition for “*dead or damaged product*” in the Defectives section ¹ (i.e. the definition does not contain a criteria for “*normal amounts of intravalvular liquid*”)

SECTION 5 - HYGIENE & HANDLING

Section - 5.2

Delete text: “5.2 *Live bivalve molluscs intended for direct consumption should possess visual characteristics associated with freshness and viability, including shells free of dirt, an adequate response to percussion, and normal amounts of intravalvular liquid as determined by product specialists familiar with the species.*”

Reason: The Canadian proposal aims to reduce repetition in this standard. We note that the provision in Section 5.2 is very similar to the provision that appears in Section 3.1.

5.3(i)

Delete text: “*Live bivalve mollusc shall be free from micro-organisms or substances originating from microorganisms or virus in amounts which may present a hazard to health in accordance with standards established by the CAC,*” and

Replace with the following Codex text: “**The products should comply with any microbiological criteria established in accordance with the Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21-1997).**”

Reason: Canada notes the Section 5.3(i) text is not consistent with the food hygiene text adopted at the 23rd Session of the Codex Alimentarius Commission (CAC) and as contained in the 13th edition of the CAC Procedural Manual (pp 96 - 97).

¹ Section 8.6 - Dead or Damaged Product states that “*dead product is characterized by no response to percussion.*”

5.3(ii)

Revise to read: ~~AND/ OR –for discussion~~

Reason: Canada is of the view that it is not possible to apply both standards and would prefer option two which states: “Live bivalve molluscs must not contain more than 330 fecal coliforms. In an analysis involving five (5) samples, none may contain more than 330 fecal coliforms; and if two (2) or more of the five (5) contain between 230 and 330 fecal coliforms, the five samples must be analyzed for E coli. In that analysis, no sample may contain more than 330 E coli, and not more than one (1) of the five (5) samples may contain between 230 and 330 E coli.”

SECTION 6 - LABELLING

6.1

Revise to read: **"The name of the food to be declared on the label shall be the common or usual name of the species of bivalve molluscs in accordance with the law and custom of the country in which the food is sold and in a manner not to mislead the consumer"**

Reason: Current Codex Standards for fish and fishery products do not require the designation of scientific name for the name of the food. Canada is of the view that this standard should remain consistent with the adopted text of existing Codex norms.

6.5.1

Revise to read: “For live bivalve molluscs, the product shall declare the harvest location and the date of minimum durability, harvest date or packing date or a statement to this effect.”

Reason: Canada is of the view that the harvest location should be declared on the label of live bivalve molluscs intended for retail sale to ensure product tracing.

6.5.3

Delete text: “6.5.3 *[Safety claims made for post-harvest treated bivalve molluscs should be specific to the target organisms that have been eliminated, reduced, or limited by the post-harvest treatment.]*”

Reason: Canada has reservations regarding the use of safety claims because it is not clear how these claims can be substantiated. Safety claim declarations on labels could also be construed by the consumer to mean that bivalve molluscs using such claims are "better and safer" product because they have undergone a specific process to eliminate or reduce the hazard.

6.5.4

Delete text: “6.5.4 *Every package containing purified bivalve molluscs must be provided with a label certifying that all molluscs have been purified.*”

Reason: Canada would like to seek clarification on the purpose for the labelling of purified bivalve molluscs (i.e. for consumer information or for batch identification). We are of the view that Section 2.2 - Process Definition, paragraph 1, and Section 5.3 (i) sufficiently address purification and microbiological criteria respectively and therefore the labelling provision 6.5.4 is unnecessary.

Section 2.2 - Process Definition, paragraph 1, has laid down purification requirements of live bivalve molluscs. It stipulates that purification is an approved process given by the official agency having jurisdiction. This food safety management approach is designed to reduce microbiological hazards to acceptable levels thus minimizing the health risks to consumers.