

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
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Agenda Item 9

CX/FFP 06/28/9-Add.1

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

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### PROPOSED DRAFT CODE OF PRACTICE FOR THE PROCESSING OF SCALLOP MEAT GOVERNMENT COMMENTS AT STEP 3

#### UNITED STATES

#### Section X Processing of Fresh and Frozen Scallop Meat

Comment: The third paragraph, second sentence, change “10 days” to “**14 days.**”

Reason: To reflect current fishing practice. Some boats go out for as long as 14 days.

#### X.1 General Addition to Pre-requisite Program

Comment: This section is to be elaborated. We therefore suggest the following bullets:

- **Linen bags used to contain shucked scallop meat on ice aboard harvesting vessels should be clean and in good repair.**
- **If scallops are shucked at sea aboard the harvesting vessel they should be thoroughly rinsed with clean sea water to minimize sand, shell, detritus and foreign material in the finished product.**
- **Shucking aboard vessels should be performed on sanitary surfaces with clean shucking knives constructed from materials that can be cleaned.**

Reason: These address some of the hygienic problems aboard a harvesting vessel.

#### X.2 Identification of Hazards and Defects

##### X.2.1.1 Marine Biotoxins

Comment: After the first sentence in the paragraph, we suggest adding the following new sentence: **“However, marine biotoxins may accumulate in the viscera and gonadal material that is usually not eaten by the consumer.”**

Reason: This sentence would clarify that marine biotoxins may be a hazard for scallop product forms that utilize the viscera or gonads.

##### X.2.2.1 Parasites

Comment: add the scientific name for calico scallops at the end of the sentence **“Argopectin gibbus.”**

Reason: To ensure that it is understood which scallop is being referred to here.

##### X.2.2.2 Excessive Viscera

Comment: The U.S. suggests renaming this section from “Excessive Viscera” to “**Excessive Viscera, Sand, Detritus and Foreign objects**” and to add the following paragraph:

**“Scallops may accumulate sand before harvesting. Sand, fine gravel and detritus may accompany harvested scallops from the natural environment to shipboard. Because small amounts of foreign material would be objectionable to consumers, care should be taken to thoroughly wash the shucked adductor muscles”.**

Reason: This better addresses the defects that may affect the acceptability of shucked adductor muscles.

#### **X.2.2.3 Added Water**

Comment: First paragraph, third sentence, we suggest revising to mention melting freshwater ice, as follows:

**“If scallop adductor muscle meat has been in contact with fresh water, including melting fresh water ice, for an excessive amount of time, water is added to the product and consumer fraud and unfair trade practices could result.”**

Reason: To remind that ice can often be the source of added water.

Comment: First paragraph, fourth sentence, we recommend revising “polyphosphates” to read “**phosphates,**” and that this change be made throughout the document.

Reason: The list of phosphates approved by JECFA includes orthophosphates and diphosphates in addition to polyphosphates.

#### **X.2.2.4 Decomposition**

Comment: We suggest adding a subsection to X.2 about decomposition, as follows:

**“Gray or black adductor meat, which indicates that the scallop was dead at the time of shucking and is likely decomposed, should be culled from the lot.”**

#### **Figure X.1 Example of flow chart of processing of scallop meat**

The comments we are providing on the flow chart essentially serve two purposes:

1. To allow for shucking on shore; and
2. To accommodate product that is not frozen, in keeping with the title of Section X, “Processing of Fresh and Frozen Scallop Meat.”

Comment: An arrow should be included from box 1 (scallop landing/deck dump) to box 7 (scallop reception).

Reason: This modification would accommodate scallops that are shucked at a shore side processing plant.

Comment: A new box should be placed to the right of box 7 (Scallop Reception) entitled “**Shucking.**” An arrow should go from box 7 to this new box. Another arrow should go from “**Shucking**” to box 9 (Washing).

Reason: Same as above, i.e., to accommodate scallops that are shucked at a shore side processing plant. Also, when scallops are sucked on shore, they may go directly to the washing step. Chilled storage would occur later.

Comment: An arrow should be drawn between box 11 (size grading) to a new box placed to the right of box 11, entitled “**Chilling.**” Another arrow should then go from “**Chilling**” to box 14 (weighing).

Reason: To bypass the freezing process in order to accommodate the production of fresh scallop adductor muscles.

Comment: A new box, entitled “**Chilled Storage,**” should be placed to the left of box 16 (Packaging), with an arrow from box 16 to it.

Reason: Products that are not intended to be frozen should be placed in chilled storage at the end of the process.

### **X.3 Processing Operations**

Comment: Change “10 days” in the third sentence to “**14 days.**”

Reason: To reflect current fishing practice.

#### **X.3.1.1 Scallop Landing/Deck Dump**

Comment: We suggest adding the following bullet:

- **“Scallops shucked at sea should be unloaded without undue delay and placed in chilled storage until processing occurs.”**

Reason: Unloading at dockside can be a source of temperature abuse if not closely monitored.

#### **X.3.1.6 Chilled Storage**

Comment: We suggest adding the following new bullets:

- **“Stored scallops should be examined regularly to ensure sufficient ice cover of the product where ice is used.”**
- **“Temperatures should be taken to ensure that the stored scallop meat remains at or less than 40° Fahrenheit or 4° Centigrade.”**

Reason: Insufficient ice or temperature control may result in decomposition.

#### **X.3.2.3 Washing**

Comment: “Shell fragments” is listed as a potential hazard. The Committee might wish to consider whether shell fragments should be considered as a hazard or a defect.

#### **X.3.2.4 Application of Additives to Scallop Meat**

Comment: We recommend adding the following technical guidance bullet:

- **Unless the addition of water is declared on the label in accordance with X.3.2.9, the application of phosphates should not result in more than a small increase in moisture that can occur under good manufacturing practices without the use of phosphates. An objective of the phosphate application should be to minimize moisture loss during storage so that the overall result is a scallop for the consumer that is reasonably close to its original natural moisture level.**

Reason: Studies on moisture gain and loss during scallop processing in the United States that included the application of phosphates demonstrate that some moisture increase during processing is probably unavoidable but that careful application of phosphates need not result in excessive increases. Moreover, because phosphates can reduce moisture loss during storage, they can help stabilize the moisture level after processing.

#### **X.3.2.5 Size Grading**

Comment: We suggest renaming this section **“Grading and Examination”**

Reason: Grading for defects, in addition to size, should occur at this step. Also, this appears to be a good step for examination for parasites to occur, as well as culling of black or grey adductor meat that indicates potentially decomposed scallops.

Comment: After “Potential Hazards,” remove “Not likely” and replace with: **“Nematode parasites (fresh product only).”**

Reason: Nematodes can be a hazard in some species of fresh scallops.

Comment: After “Potential Defects,” add: **“improper size variation, unacceptable color variation, decomposition, excessive nematode parasites (frozen product)”**.

Reason: These defects can be addressed at this stage of production.

Comment: We suggest adding the following bullet points to this sub-section:

- **Scallop color variation should be examined on the basis of product specifications that have been established for consumer acceptance.**
- **Scallops with visible parasites should be culled from the lot if the scallops are not to be frozen.**

- **Care should be taken to ensure that scallops are not subject to temperature abuse during the grading and examination process. Containers of graded and examined scallops should be kept cool to ensure that the internal temperature of the scallops does not exceed 40° or 4° Centigrade.**
- **Gray or black adductor meat should be culled from the lot.**

Reason: These potential hazards and defects should have appropriate technical guidance as to how to control them. We recognize that materials on parasites in scallops is still to be elaborated so the materials we are offering for parasites should not be regarded as start, but not the last word, on that subject.

### **X.3.2.6 Freezing Process**

Comment: After “Potential Hazards,” replace “Not likely” with **“Parasites.”**

Reason: The freezing process should be adequate to kill any living nematodes.

### **X.3.2.8 Weighing**

Comment: The United States suggests adding the following bullet points:

- **Net weight is often obtained by weighing glazed scallops and then accounting for the weight of the glaze. For that reason, glaze levels should be routinely determined to ensure that proper net weights are obtained.**
- **Scales should be properly adjusted to account for the estimated glaze percentage and re-adjusted when glaze percentages change.**

Reason: Glaze should not be included in the net weight of the final product.

### **X.3.2.9 Labelling**

Comment: After “Potential Defects,” add **“undeclared excessive moisture.”**

Reason: To match the “potential defects” with the second technical guidance bullet relating to excessive undeclared moisture. Excessive moisture could occur even when an undeclared additive has not been used.

## **IFAC**

The International Food Additives Council (IFAC) is an association representing companies who produce high quality substances, including food grade phosphates, used worldwide as food additives. IFAC is officially recognized as a Non Government Organization (NGO) qualified to participate in matters before the Codex Alimentarius Food Standards Programme. IFAC respectfully submits the following comments on the above-mentioned Proposed Draft Code of Practice for the Processing of Scallop Meat.

IFAC is pleased to see that this Proposed Draft Code includes the use of phosphates in Fresh and Frozen Scallop Meat. The Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat, provided in the Report of the Twenty-Seventh Session of the Codex Committee on Fish and Fishery Products, Alinorm 05/28/18, Appendix VII, states under Section 4, Food Additives – “No food additives are permitted in these products.” This is inconsistent with the Proposed Draft Code and the Proposed Draft Standard should be revised to reflect the use of phosphates as included in the Draft Code.

As a general comment, please consider changing “pyrophosphates” to “phosphates” throughout the Proposed Draft Code. Use of the term phosphates better reflects current industry practice.

Please consider the following additional comments on the Proposed Draft Code of Practice:

Section X Processing of Fresh and Frozen Scallop Meat: This section should note that, in addition to more direct water exposure, basic icing in compliance with GMP’s will also influence the moisture content of scallops.

Section X.2.1 Hazards: We believe the Proposed Draft Codex Standard referred to in this section should be the “Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat” – not the “Proposed Draft Standard for Live [and Raw] Bivalve Molluses.”

Section X.2.2.3 “Added water”: Again, it is important to note that basic icing will also influence the moisture content of scallops.

Figure X.1 Example of flow chart of processing of scallop meat: This diagram might also address the harvest of whole, shell-on scallops for eventual shucking in a land-based facility.

#### Section X.3.2.4 Application of Additives to Scallop Meat (Processing Step 10, 18, 19)

*Technical Guidance* (First bullet): Please revise to read – “Phosphates can be applied by dipping, spraying or tumbling in phosphate solution.” – thereby deleting the first sentence of this bullet.

References:

Lampila, L.E. 1994. Polyphosphates: rationale for their use and functionality in seafood and seafood products. proceedings of the joint meeting of the Atlantic fisheries technologists and tropical subtropical fisheries technologists. williamsburg, va. pages 13-20.

Henson, L.S. and Kowalewski, K.M. 1992. Use of phosphates in seafood. *Infofish International* (5/92):52-54.