

# codex alimentarius commission



FOOD AND AGRICULTURE  
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Agenda Item 7

CX/FFP 06/28/7

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

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### PROPOSED DRAFT STANDARD FOR QUICK FROZEN SCALLOP ADDUCTOR MUSCLE MEAT GOVERNMENT COMMENTS AT STEP 3 (European Community, United States)

#### EUROPEAN COMMUNITY

The European Community and its 25 Member States (ECMS) would like to submit the following comments:

#### General comments

Two example statements of principle were added to the essential composition and quality factors section of the Standard following discussion at the 27<sup>th</sup> CCFFP. These statements introduce the idea that it is not an acceptable practice to process and store scallops in a manner that would result in the uptake of water and that countries may establish moisture limits or criteria to ensure this provision is met.

The ECMS fully agree that consumers should not be misled as to the presence of added water and that fraudulent practices, whereby excessive amounts of water are added, should not be permitted in scallops sold as dry product (i.e. raw cleaned product).

However, it appears that scallop meat tends to absorb water during the different steps of preparation. The ECMS are therefore of the opinion that this fact should be acknowledged with due regard to the protection of consumers.

**3.3.2 Essential Composition and Quality Factors** - The ECMS agree that countries may establish a scientifically supported moisture limit for dry products, as an internationally agreed limit or moisture protein ratio may not be possible.

#### Further comments

We note that work is continuing on a Code of Practice on the processing of scallop meat, identifying potential hazards and defects and appropriate controls for these (Alinorm 05/28/18, paras.113-114). We support the development of such a Code.

#### UNITED STATES

In response to CL 2005/14-FFP, March 2005, the United States respectfully submits the following comments on the Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat (at step 3 of the Procedure). Recommended additional language within sentences is highlighted in bold for the convenience of the reader.

**1. SCOPE, 1<sup>st</sup> paragraph, second sentence**, revise to read as follows:

“This standard does not cover scallop meat **that is formed, mixed with extenders or** bound by fibrinogen or other binders.

Reason: This clarifies that these other product forms that are common in the market place are not covered by the scallop standard.

### **3. ESSENTIAL COMPOSITION AND QUALITY FACTORS, Subsection 3.3.2**

Comment: This section contains two examples of statements of principle about the unacceptability of excessive moisture uptake. The U.S. strongly supports the principle and would be pleased with the inclusion of either statement into the standard. The U. S. has a slight preference for example #2 because it appears to be more flexible. It states that a country may establish a scientifically supported “criterion” in order to ensure that moisture uptake is not excessive. A “criterion” could be a moisture limit or limits, or it could be something else, like a code of practice requirement. By contrast, example #1 only appears to contemplate the establishment of a “technically feasible moisture limit.” We prefer the broader approach that Example #2 appears to offer.

Should the Committee prefer Example #1, we would suggest revising the first sentence to read “...one or more moisture limits,” rather than “....a moisture limit,” because countries should be free to establish different moisture limits for different species, at their discretion.

Both Example #1 and Example #2 contain a sentence that requires harvesting, storage, and processing to be conducted in accordance with good manufacturing practices. The United States proposes that the following sentence be added after that sentence:

**“To the extent that their use is acceptable within the country of production and any country to which they are being exported, phosphates must be applied in strict conformance with this section and with good manufacturing practices as provided in section “x” of the Code of Practice for the processing of scallop meat (under elaboration) in order to prevent the retention of excessive water.”**

We are proposing this additional sentence because phosphates have a well known ability to cause water uptake in scallops and other products. It is essential -- and worth pointing out here -- that phosphates must be used in accordance with good manufacturing practices to prevent them from causing excessive water uptake to the detriment of consumers. Phosphates are allowed in scallops in a number of countries because they have legitimate uses in these products that benefit consumers. Phosphates can extend shelf life and minimize the loss of natural water during both storage and cooking without causing excessive moisture gain. Minimizing moisture loss during cooking allows for the retention of water soluble nutrients. These benefits notwithstanding, the language that the United States is proposing would acknowledge that phosphate use is not universally accepted. This language is intended to allow countries to decide for themselves whether to allow or accept scallops treated with phosphates.

### **4. FOOD ADDITIVES**

Comment: According to the Report of the 26<sup>th</sup> Session of the CCFFP (ALINORM 04/27/18), the language in this subsection was revised to read as follows:

**“[Polyphosphates are allowed in these products (to be further elaborated).]”**

The Report also requested comments on the use of actual compounds and their proposed levels.

We appreciate that the above language is in brackets, as is the language in the current draft disallowing the use of additives, so either way the entire concept is subject to further discussion. The United States supports the language in the report that would allow phosphates. As described above, phosphates are safe and have legitimate uses for extension of shelf life and prevention of moisture loss during both storage and cooking. Phosphates are permitted in a number of countries for these purposes. We urge that CCFFP refrain from prohibiting an additive that has legitimate uses and that is in fact used in a number of countries, especially since other Codex fish standards list phosphates as permitted additives. For those countries that now do not permit the use of phosphates with scallops, the United States has proposed language in section 3.3.2 that would allow these countries to continue to prohibit it.

Regarding the request for comments on the use of actual compounds, the U.S. suggests that the Committee consider the phosphates approved by JECFA that are listed as water retention agents within Table One of the Codex General Standard for Food Additives. These additives are:

339i Monosodium Orthophosphate	339iii Trisodium Orthophosphate
340i Monopotassium Orthophosphate	340ii Dipotassium Orthophosphate
340iii Tripotassium Orthophosphate	341i Monocalcium Orthophosphate
341ii Dicalcium Orthophosphate	341iii Tricalcium Orthophosphate
450i Disodium Diphosphate	450ii Trisodium Diphosphate
450iii Tetrasodium Diphosphate	450v Tetrapotassium Diphosphate
450vi Dicalcium Diphosphate	450vii Calcium Dihydrogen Diphosphate
452i Sodium Polyphosphate	452ii Potassium Polyphosphate
452iii Sodium Calcium Polyphosphate	452iv Calcium Polyphosphates
452v Ammonium Polyphosphates	542 Bone Phosphate

## 5. HYGIENE AND HANDLING, Subsection 5.2

Comment: The United States questions whether there are any harmful algal blooms that affect the adductor meat of scallops. We are aware that algal blooms can affect viscera and roe, but we are not aware of problems with adductor meat.

## 6. LABELLING, Subsection 6.4

Comment: The term “identification mark” in the first line of the paragraph needs elaboration. The United States does not know what this means.

6. LABELLING, propose a new subsection to read as follows:

### “6.5 Phosphates

**When phosphates are applied to scallops they must be listed as an ingredient on the label.”**

## 7.3 Determination of Count and Pieces, 1<sup>st</sup> paragraph,

- Add “exclusive of the pieces found” in the second line after the word “meat;” and
- Add “in the frozen state” in the third line after the word “weight.”

With these additions, the sentence would read as follows:

“When declared on the label, the count of the scallop meat shall be determined by counting the numbers of scallop meat **exclusive of the pieces found** in the container or representative sample thereof and dividing the count of scallop meat by the actual de-glazed weight **in the frozen state** to determine the count per unit weight.”

Reason: Clarification

- To help clarify that scallop pieces should not be used to determine the count of whole scallops. The point is made later, although indirectly, through the definition of “scallop piece” in the second paragraph in 7.3, but we suggest the additional language here in order to help the reader understand the first paragraph.
- To help clarify that the weight of the sample unit in the equation for determining percent of scallop pieces the de-glazed weight *in the frozen state*. This point is made in a subsequent section, i.e., section 7.4, but we believe it would be helpful to the reader if it were pointed out in this section since it is relevant here.

7.3 Determination of Count and Pieces, 2<sup>nd</sup> paragraph, add “randomly selected” after the word “10” in the second line.

Reason: It is possible to bias the estimate of percentage of scallop pieces by selecting the larger scallop meats or the smaller ones. Ensuring that every scallop meat in the sample has an equal chance to be selected will help make the result more accurate.

7.4 Determination of Net Weight of Products Covered by Glaze, 1<sup>st</sup> sentence, add “For individually quick frozen scallops” to the beginning.

Reason: Clarification. To help ensure that the reader understands that this methodology applies specifically to IQF scallops.

**7.6 Procedures for Thawing** and **7.7 Cooking Methods**, combine these two sections as follows:

**“7.6 Preparation for Sensory Examination**

**7.6.1 Procedures for Thawing**

**7.6.2 Cooking Methods for Sensory Examination”**

Reason: To clarify that both of these sections refer to preparation for sensory evaluation.

**7.8 Parasites**

Comment: According to the Report of the 26<sup>th</sup> Session of the CCFFP (ALINORM 04/27/18), a new section 7.8 was created to read as follows:

**“Scallops are visually looked at by turning them over in an adequately lighted room (where a newspaper may be read easily).”**

This change should be reflected in the current draft. If the proposal by the United States to combine subsections 7.6 and 7.7 is accepted, subsection “7.8 Parasites” should be renumbered to “7.7 Parasites.”

**8.4 Parasites**

Comment: According to the Report of the 26<sup>th</sup> Session of the CCFFP (ALINORM 04/27/18), this section was revised to read as follows:

**“The presence of visible parasites on the near surface of the scallop adductor muscle shall not exceed 20% of individuals in the sample.”**

This change should be reflected in the current draft. Defects in this section are quality defects. As such they are of concern to consumers with respect to the effect they have under the conditions of final preparation and consumption. In the case of helminth parasites the visibility of defects has the greatest negative effect on consumer acceptance. While wild harvested scallops may harbor parasites, levels above 20% are likely to be rejected by consumers. There are no documented consumer studies supporting this cutoff, but some experience with consumer complaints and personal experience suggest that this is about where people notice and complain about the presence of small but visible parasites.

**8. Definition of Defectives**, add a new subsection to read as follows:

**“8.5 Discoloration**

**Discolored scallops are those that have a different and noticeable hue other than the off-white color of normal scallops. Discolored scallops are usually orange or yellow.”**

Reason: Consumers do not always find discolored scallops acceptable. Orange or yellow colored scallops are usually culled from commercial packs in the United States.