

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 4

CX/FFP08/29/4-Add.2
Original Language Only

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS
Twenty-ninth Session
Trondheim, Norway
18-23 February 2008**

**DRAFT STANDARD FOR LIVE AND RAW BIVALVE MOLLUSCS
COMMENTS AT STEP 6
(United States of America)**

The United States is pleased to respond to CL 2007/21-FFP, July 2007, regarding the Draft Standard for Live and Raw Molluscs (ALINORM 07/30/19, Appendix V). The United States respectfully submits the following comments and suggested revisions below. Our recommended additional language is highlighted in bold for your convenience.

Regarding I-5.3, the United States recommends removing the second testing regime example and revising the subsection to read as follows:

“I-5.3 (i) An appropriate water classification and monitoring system shall be used in conjunction with an MPN method specified in ISO 16649-3 or by an equivalent method to ensure that live bivalve molluscs in the edible parts (the whole part or any part intended to be eaten separately) do not exceed the following limits:

Escherichia coli/g n=5 c=1 m=2.3 M=7

Where ‘n’ = the number of sample units, ‘c’ = the number of sample units that may exceed the limit ‘m’, and ‘M’ is the limit which no sample unit may exceed.”

The CCFFP listed examples of testing regimes for *E. coli* and faecal coliform in this standard so as to recognize various country interests and practices and to prevent Committee deadlock. However, the CCFH reviewed the hygiene provisions and asked the CCFFP to reconsider the manner in which the microbiological criteria are presented. The CCFH recommended that only one microbiological criterion be set as an indicator for faecal coliforms. Recognizing that the examples currently listed are not significantly different from one another and are not likely to produce substantially different public health outcomes, the United States suggests that as long as the MPN method(s) in ISO 16649-3 or equivalent is used in conjunction with an appropriate water classification and monitoring system, then the public health should be sufficiently protected.

Regarding I-5.3(iii), the United States suggests revisions to the subsection to read as follows:

“I-5.3 (ii) Live bivalve mollusks must not contain *Salmonella* in 25 g flesh and [**pathogenic *Vibrio parahaemolyticus* X MPN/g flesh**].”

It is premature to list a standard for *Vibrio parahaemolyticus*. There is still science needed on the toxigenicity of different strains. The percent pathogenic is most important consideration and that level varies by at least an order of magnitude, even within the U.S. The suggested level of 100 MPN/g flesh is one that few countries would be able to meet, even under the best conditions. Since it is still a number of years before a level could be listed in the Standard, the United States suggests advancing the document while putting a placeholder in this subsection for the CCFPP to revisit on a later date. Additionally, the CCFH agreed to develop the proposed draft Code of Hygienic Practice for *Vibrio* spp in Seafood as new work; therefore, this subsection could be forwarded to the CCFH for their consideration.

Regarding I-6.4 Labelling of Non-retail Containers, we recommend that the last paragraph should be deleted.

Subsection I-6.4(ii) was revised to generally describe the necessity of traceability/product tracing information in the event of a food safety problem and to list some examples. Since lot identification, name and address were removed from that list of examples, the last paragraph no longer needs to be included. Alternatively, if the Committee believes that it is important to retain this information, the information from the last paragraph could be incorporated into the list of examples.

Regarding, I-7.4 Methods of Analysis of *Escherichia coli* and faecal coliforms in shellfish meats, if the Committee decides to delete the faecal coliform method in I-5.3, then the heading for this subsection should be revised and the reference should be removed.