

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 13

CX/FFP08/29/11-Add.1

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

Twenty-ninth Session
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PROPOSED DRAFT STANDARD FOR FRESH/LIVE AND FROZEN ABALONE (*HALIOTIS* SPP.) COMMENTS AT STEP 3 (Mexico, New Zealand, FAO)

MEXICO

Mexico welcomes the opportunity to comment on document CX/FFP 08/29/11 on the proposed draft standard for live abalone and for raw abalone.

The following observations refer to the Spanish version of the document:

1. Mexico considers it incorrect to use 'Peine' to designate **Abulón** [Abalone] as other Codex documents use the same name for a pectinid bivalve mollusc (scallop). Organisms of the genus *Haliotis* are gastropods, not bivalves, so we suggest using the term *Abulón*, as it is known in Mexico and other Latin American countries. We therefore suggest that the term *Peine* be replaced by *Abulón* throughout the document.

2. In Section I-2.2 Process Definition: Live abalone are harvested alive from a harvesting area or farm approved by the official agency having jurisdiction, to supply abalone for direct human consumption, and may be purged in clean sea water and/or drained prior to packaging for direct human consumption or for further processing as in II-2.2. **We suggest that conditions and a minimum duration be set for the purging process.**

NEW ZEALAND

New Zealand is pleased to offer the following comments in relation to the above request for comments.

General Comment

The proposed standard suggests that abalone should be treated as if they were subject to the same sorts of contamination problems as bivalve molluscs. The New Zealand experience with abalone (we have two commercial species both wild caught and in aquaculture) is that in general, this is not appropriate as their method of feeding (i.e. grazing) leaves them much less susceptible to the sorts of contamination problems that filter-feeding bivalves have. In order to make sure that this was not a unique experience we requested advice from FAO. They have provided the following information which supports our position.

FAO searched the detention Rapid Alert data from EU (2003-2006) and United States Import refusal data (July 2006-June 2007) and reported the following.

EU RASFF

One notification in 2003 for canned Abalone for illegal import.

US

Two import refusals in Aug 2006, one for canned Abalone for filth, and another for Abalone for lack of processing information.

This lack of detention data strongly suggests that there are very few problems with these products in trade, and certainly not the sort of problems that are occurring with bivalve shellfish.

This lack of data on actual problems with abalone in international trade calls into question the need for many of the provisions of the standard as currently drafted.

New Zealand's position is that standards should primarily be based on documented hazards and in the absence of clear evidence of the existence of hazards that need to be mitigated, standards should not be elaborated.

For these reasons New Zealand requests that the CCFFP carefully consider whether a standard for these products is in fact necessary.

Title and Scope

If the CCFFP decides that a standard is still necessary for these products then New Zealand proposes the following in relation to title and scope.

New Zealand notes that the Codex Alimentarius Commission has indicated that it would be desirable that the CCFFP consider the scope of this standard are broadened to include other marine gastropods. Paragraph 100 of the CAC report refers as follows:

"Standard for Fresh/Live and Frozen Abalone (*Haliotis* spp.) 100. The Commission, while approving the proposal for new work on the revision of the Standard for Fresh/Live and Frozen Abalone (*Haliotis* spp) endorsed the recommendation of the Executive Committee that the Committee on Fish and Fishery Products consider broadening the scope of the standard to include other gastropods."

New Zealand proposes that the standard be renamed "Standard for Fresh/Live and Frozen Marine Gastropods"

This will remove any need to elaborate separate standards for other marine gastropods such as snails, whelks, sea slugs etc.

In considering the scope CCFFP is faced with needing to make a decision on whether the standard should include the shucked and eviscerated muscular foot of a marine gastropod. This portion of the shellfish is conceptually similar to the scallop adductor muscle which is excluded from the scope of the bivalve shellfish standard because of the significantly lower food safety risk it presents.

The rationale for exclusion would be the same as that applied to scallop adductor muscle. That is, because the viscera are removed, there is no significant likelihood of microbiological contamination and the risk of marine biotoxin contamination would appear to be minimal. New Zealand has not detected marine biotoxins in abalone foot muscle, although low levels have been found in the viscera during algal toxic bloom events. We are not aware of any data on the foot muscle from other gastropods showing that they become contaminated with marine biotoxins.

For consistency with the bivalve shellfish standard we propose that the scope be as follows:

"This standard applies to live marine gastropods and whole raw marine gastropods. It does not apply to shucked, eviscerated marine gastropod foot muscle."

If this definition is adopted there is then no need for two separate parts to the standard.

We have not considered the remainder of the proposed draft standard in detail as until the above matters are discussed by the committee and resolved, it is unclear how best to proceed.

However there are some further general principles that we would like to raise for the Committee's consideration.

Microbiological criteria for abalone/marine gastropods

While presumably gastropods could have excessive levels of pathogenic bacteria if harvested from inappropriate areas – e.g. adjacent to sewer outfalls, this may not be a matter best addressed by applying a microbiological standard to product in trade; rather the standard should focus on the competent authority ensuring the gastropods are harvested from suitable areas. (For example per I-2.2) New Zealand is not aware of the use of indicator organisms for assessing the safety of non-filter feeding molluscs being undertaken routinely and questions whether there is a body of data available to support such a practice.

For aquacultured products, following the CCFPP COP section on aquaculture should address any issues.

Marine biotoxins in abalone/marine gastropods

The inclusion of standards setting limits for marine biotoxins in gastropods needs to be supported by data. New Zealand's experience is that biotoxins are confined to the viscera of abalone which is often discarded. To date only low levels of PSP have been found in viscera as well as one or two DSP ELISA positive results unconfirmed by more definitive methods.

Frozen Gastropods

Once the viscera are removed, our view is that the product is really no different to a fish fillet or a scallop adductor muscle and these products should be excluded from the standard as has been done for scallop adductor muscle in the bivalve shellfish standard. If this section is retained, compliance with the standard for Live/Raw gastropods may not be a necessary pre-requisite for processing because removal of the viscera is likely to result in a safe product even if there is biotoxin or other contamination in the gut.

FAO

Section I-5 Hygiene and Handling

I-5.3

iii Live abalone must not contain *Salmonella* in 25g flesh and *Vibrio parahaemolyticus* in 100g/flesh.

It is now well recognized that *Vibrio parahaemolyticus* is a part of the autochthonous microflora of coastal and estuarine waters throughout the world and is not derived from faecal contamination. Hence zero tolerance for an organism that is part of the natural microflora of the waters in which Abalone is cultured would not be achievable. The US FDA Risk Assessment for *Vibrio parahaemolyticus* in oysters has shown that controlling oysters at harvest in US at a level of 100 *Vibrio parahaemolyticus*/g would reduce illness by 98% and would lead to diversion of 66% from "raw market". The FAO/WHO Risk Assessment for *Vibrio parahaemolyticus* in oysters confirms this finding and shows that illness due to oysters meeting criteria of 100 *V.parahaemolyticus* would be 1 case in 5 years in Australia, 1 case in 10 years in New Zealand, and 1 case in 2 years in Japan. The impact on oyster market would be diversion of 67% stock in Australia, 63% in New Zealand, 16% in Japan.

If a level of 100/g in oysters for raw consumption is safe, why should abalone have absence in 100g? In fact the standard suggested for *V.parahaemolyticus* in abalone (absence in 100g) is even more stringent than the *Salmonella* standard (absence in 25g).