

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
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ORGANIZATION



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Agenda Item 3

CX/FFP 08/29/3

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

**DRAFT CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS (LIVE AND RAW BIVALVE
MOLLUSCS, LOBSTERS AND CRABS AND RELEVANT DEFINITIONS)
COMMENTS AT STEP 6
(Brazil, Kenya, New Zealand)**

BRAZIL

SECTION 13 - PROCESSING OF LOBSTERS

13.1 GENERAL – ADDITION TO PRE-REQUISITE PROGRAMME

Además del programa de requisitos previos que se mencionan en la Sección 3 de este documento, se exhorta a los operadores de establecimientos de elaboración a evaluar el diseño y construcción de sus instalaciones y el mantenimiento e higiene de su operación, específicamente para la elaboración de langostas ~~y cangrejos~~. Brazil suggests deleting the words “y cangrejos”, in the Spanish version, since this section is exclusive for lobster.

13.2.1.1 Potential Hazards/Chemical Hazards/Veterinary Drugs

Brazil suggests deleting the word “crabs”, since this section is exclusive for lobster.

13.3 Processing Operations – Lobsters

Figure 13.1 Example of flow chart for frozen **or refrigerated** raw lobster **tail/frozen or refrigerated raw lobster meat** processing

Brazil suggests including the bolded words above.

Reason: Coherence with the flow chart

13.3.1 Frozen **or refrigerated raw lobster tail/**frozen or refrigerated raw lobster meat****

Brazil suggests including the bolded words above.

Reason: Coherence with the flow chart.

13.3.1.3 Tailing/Technical guidance/First bullet (Spanish version)

“...cuando las langostas no se ~~capturan~~ vivas, la cola y el cefalotórax deberían separarse inmediatamente después de haberlas capturado.”

Brazil suggests deleting the word “capturan” and includes the word: “desembarquen”

Reason: The translation for the word “landed” is wrong causing misunderstanding.

13.3.1.5 – Application of Additives to Lobster Tails/Potential Defects

Brazil suggests deleting “Physical contamination”.

Reason: the preventive measures to avoid the physical contamination are described in item 13.3.1.4.

13.3.1.7 Weighing /Wrapping/Potential Hazard (Processing Step 7)

Brazil suggests changing microbiological contamination to unlikely.

Reason: the weighing step should not be considered a place where could occur contamination if you have a GMP procedure.

13.3.1.10 Glazing/Potential Hazards (Processing Step 10)

Brazil suggests to change microbiological contamination to unlikely, since the product is frozen in these stage, yet and the water used in the plant should be potable and clean.

13.3.1.11 Final Packaging/Labelling/2^o bullet

Brazil suggests moving this bullet to item 13.3.1.5

Reason: coherence.

Figure 13.2 Example of Flow Chart for Processing of Frozen or Refrigerated Cooked Lobsters

Brazil suggests including the bolded words above.

Reason: Coherence with the flow chart

Brazil suggests including in the flow chart the washing step, between step 1 and 3.

Reason: the washing step before to start the processing is important in any processing flow, since it reduce the microorganism number in raw material.

Brazil suggests including in the 8th stage – 13.3.2.8, the step weighing.

Coherence with others flow charts and the Technical guidance.

13.3.2.4 Cooking/Technical Guidance/Last bullet

Brazil suggests adding at the end of the phrase: “and may cause melanosis due to the enzyme remained”

Reason: Lobster undercooked may remain some enzymes which cause melanosis in the final product.

13.3.2.5 Cooling/Potential Hazard (Processing Step 5)

Brazil suggests changing microbiological contamination to unlikely.

Reason: the water used in the plant should be potable and clean..

13.3.2.5 Cooling/Technical Guidance/5th bullet (Processing Step 5)

Brazil suggests deleting this bullet.

Reason: The 1st bullet and the 5th bullet are the same.

13.3.2.8 Grading/Weighing/Wrapping (Processing Step 8)

Brazil suggests including the step weighing as explained in Figure 13.2.

Reason: coherence with the flowchart.

13.3.2.8 Grading/Weighing/Wrapping/Potential Defects (Processing Step 8)

Brazil suggests including the terms: “incorrect weighing”.

Reason: Coherence to the Technical Guidance.

13.3.2.8 Grading/Weighing/Wrapping/Technical Guidance/2nd bullet (Processing Step 8)

Brazil suggests deleting this bullet: “lobster meats should be uniform in size”.

Reason: In many times, it is not possible to obtain uniforms sizes, but within some limits to be determined by the importer country.

SECTION XX - PROCESSING OF CRABS

xx. 1 General - Addition to Pre-Requisite Programme/Third Line

Brazil suggests deleting the word “lobster”.

Reason: this section is exclusively to crabs.

xx.2.1.1. Potential Hazards

Brazil suggests including the text about parasites which was in the previous version of this Draft of Code of Practices: A trematode belonging to the Genus Paragonimus is the very common oriental lung fluke. Humans are infected by eating raw or inadequately cooked crabs or crayfish. The adult parasite lives in

cysts in the lungs, but it also has a tendency to migrate to other sites such as liver, spleen and brain. A chronic pulmonary disease ensues when the worms develop in the lungs.

Reason: trematodes are important in a food safety view.

xx.2.2 Minimise the Deterioration of Crustaceans Crabs - Handling

We suggest changing crustaceans for crabs.

Reason: The meaning of crustaceans is broader than just crabs.

FIGURE xx.1 Example of a flow chart for the processing of pasteurized crabmeat

Step 13. Brazil suggests changing “Almacenamiento en Congelador” to “Almacenamiento en Refrigerador” in Spanish text.

Reason: Consistency.

xx.3.1.1 Live Crab Reception/Potential Hazards

Brazil suggests changing Phycotoxins to Marine Biotoxines.

Reason: Coherence with other Codex texts and the previous text.

xx.3.1.2 Live Crab Holding (Processing Step 2)

Brazil suggests to change “Sección 13.3.1.2 –Mantenimiento de Cangrejos Vivos” to “Sección 13.3.1.2 –Mantenimiento de **Langostas** Vivas.” in spanish versión.

Justification: The title of the section is wrong.

xx.3.1.4 Cooking/Technical Guidance/First Bullet (Spanish version)

Brazil suggests including “carne de cangrejo cocida” after “cangrejos cocidos”.

Reason: Consistency.

xx.3.1.5 Cooling/Potential Hazards (Processing Step 5)

Brazil suggests changing microbiological contamination to unlikely.

Reason: The water used in the plant should be potable and clean.

xx.3.1.16 Distribution/Transport/Potential Defects

Brazil suggests deleting: Thawed frozen products.

Reason: The final product is pasteurized not frozen.

xx.3.1.16 Distribution/Transport/Potential Hazard

Brazil suggests deleting this point.

Reason: coherence with the lobster section.

Figure xx.2 Example of flow chart for Chilled and Frozen Cooked Crab/Chilled and Frozen Cooked Meat Crab

Brazil suggests including the product: Chilled and Frozen Cooked Meat Crab.

Reason: consistency with the flow chart.

Brazil suggests including the weighing step between Step 6 and 9.

Reason: Consistency with other flow chart.

xx.3.2.5 Cooling/Potential Hazard (Processing Step 5)

Brazil suggests changing microbiological contamination to unlikely.

Reason: The water used in the plant should be potable and clean.

xx.3.2.10 Glazing/Technical Guidance

Brazil suggests adding the others points of Technical guidance from Item 13.3.1.10

KENYA

Definitions

Depuration:

Kenya proposes the definition of “Depuration” as “**Means the reduction of microorganism to a level of acceptable for direct consumption by the process of holding live bivalve molluscs for a period of time under approved, controlled conditions in natural or artificial sea water suitable for the process, which may be treated or untreated**”.

2.9 LOBSTERS AND CRABS

Crab:

We propose to rephrase the definition of Crabs as follows: means the commercially important species of the Decapoda order. This is because All crabs in the world fall under the Decapoda order.

SECTION 7: LIVE AND RAW BIVALE MOLLUSCS

clause 7.5 The floating arrow should come from “**Relaying**” to “**Transport**” in the flow chart.

clause 7.7 the processing to reduce or limit target organisms to read “**the processing to reduce or limit target microorganisms**”

Clause 7.6.3 Washing declumping, debyssing and grading.

Proposes changes in definitions:

Declumping: Separation of shells in order to reach the meat of bivalve molluscs.

Debyssing: Is the physical removal of small threads sticking out from bivalve molluscs.

Distribution 7.11

We propose that distribution for live and raw bivalve molluscs should be separated because the distribution conditions vary. Raw bivalves should be chilled or frozen and for live bivalves should be at ambient temperature.

We propose that **Figure .7.1** Example of a simplified flow diagram for the production of live and raw bivalve molluscs is not necessary since the first flow chart is more detailed. The first flow chart does not have a legend and thus provide one.

7.1.1 GENERAL REMARK ADDITION TO THE PREREQUISITE PROGRAMME

We proposes that Paragraph 4. 3rd sentence to read “*E.coli* shall be used as an indicator for the possibility of faecal contamination” because *E.coli* resides in the elementary canal of human beings.

7.2.2 MONITORING OF GROWING AREAS

Classification/reclassification

We propose to remove the words *E.coli* /faecal coliforms from the sentence because when we are monitoring the growing areas we do not have to narrow it to the *E.coli* and faecal coliforms apart from other microbes which might occur; therefore the sentence should read: “Classification/reclassification of growing areas by sanitary survey, monitoring of total coliforms attain appropriate frequency based on the risk of contamination, and other sanitary control measures as applicable.

7.2.2. 1 Page 58 E.COLI/FAECAL COLIFORMS

We propose the title to change to **Total Coliforms** instead of *E.coli*/faecal coliforms/total coliforms because total coliforms is a broader term which takes care of the first two bacteria.

The first sentence to read as follows:

We propose the first paragraph to read “**All growing areas should be monitored for the presence of total coliforms at an appropriate frequency based on the risk of contamination**”.

We propose the 2nd paragraph should read “**Test for *Escherichia coli* should be used to determine the degree of faecal contamination**”.

We propose Paragraph 3: Should read “*E.coli* shall be used as an indicator for the presence of faecal **contamination**” without including the words faecal coliforms or total coliforms.

7.2.2.4 CHEMICAL CONTAMINANTS

We propose that the last sentence to be re-phrased to read **“a spillage of large quantities of anti-fouling paint” because of the amount which can warrant such sampling.**

7.3 HARVESTING AND TRANSPORTATION OF LIVE BIVALE MOLLUSCS

Bullet one add the word **“and** “between the word **“disinfected”** and **“sanitized”** and the **“** bracket”- to be removed from the word sanitized.

7.5 DEPURATION

Bullet 5: Kenya proposes to delete **“faecal coliforms”** at the end of the sentence.

7.6 PROCESSING OF BIVALVE MOLLUSCS IN A DISTRIBUTION CENTRE OR AN ESTABLISHMENT

Kenya proposes the word **“commingling live with raw products”** to be replaced by **“coming to contact with live and raw products”**.

7.6.2 Second last Bullet Page 64

Kenya proposes to add the words **“and sanitized”** between **“disinfected”** and **“at”** because sanitization will guarantee thorough cleaning.

7.6.3 Washing, declumping, debyssing and grading

Bullet 2 Kenya proposes that the word **“with”** be replaced with **“of”** and the sentence should read **“The number of handling bivalve molluscs should be minimized”**.

7.6.5.2 STORAGE OF RAW BIVALVE MOLLUSCS

On second Bullet, Kenya proposes the word **“packaging”** to be replaced with the word **“Packaged”**.

7.8.2 HEAT SHOCKING OF BIVALVE MOLLUSCS FOLLOWED BY PACKAGING

First Bullet, Kenya proposes to replace the word **“must”** with the word **“shall”** which means compulsory politely.

7.9 DOCUMENTATION

Bullet 2 **“a period of minimum one year”** should be replaced by **“a minimum period of one year”**.

SECTION 13: PROCESSING OF LOBSTERS

FLOW CHART Page 72

This flow chart is for illustrative purposes only. For in factory HACCP implementation a complete and comprehensive flowchart has to be drawn up for each process.

FIGURE 13.1 EXAMPLE OF FLOWCHART FOR FROZEN LOBSTER PROCESSING

Kenya appreciated the work done to come up with the comprehensive flow chart however the chart has some small errors. We therefore propose the following amendments:

The arrow from chilling box No.8 to box No.6 to be removed because we cannot chill before you do divining/trimming/washing. The flow chart should tally with the processing steps indicated in the flowchart.

We propose that the current box number”**16 (13.3.1.15) Packaging /label storage** should be box number **14 (13.3.1.14).**

DISTRIBUTIONS AND TRANSPORT (PROCESS STEP 17)

The last box, should be **13.3.1.16** instead of **13.3.1.13**

The arrow from box No.2 **“Live lobster holding 13.3.2.2”** going to Box **“No.4 Cooking 13.3.2.4”** should be **deleted** because it is against the animals welfare and unsafe to the handler. Procedurally the processing of lobster **should undergo drowning or pacifying 13.3.2.3 before cooking.**

This flow chart is for illustrative purposes only. For in factory HACCP implementation a complete and comprehensive flowchart has to be drawn up for each process. Page 85

FIGURE 13.2 EXAMPLE OF FLOWCHART FOR COOKED LOBSTER

Cooked Lobster Flowchart

We propose the following comments:

13.3.2.7 Page 80 SHUCKING DE-VEINING (processing step 6)

We propose the word **“AND WASHING”** to be added to the flow chart as done in the clause in the standard, since one cannot do chucking and de-veining without washing.

Bullet 4. Kenya proposes that the word **“and”** to be added between **“water”** and **“clean”**; and the word **“or chlorinated water”** be deleted because it's covered under potable water. The sentence to read as follows: **lobster meat should be thoroughly washed on all surfaces in cold potable water and clean sea water.**

This flow chart is for illustrative purposes only. For in factory HACCP implementation a complete and comprehensive flowchart has to be drawn up for each process. Page 85

FIGURE xx.1 EXAMPLE OF FLOWCHART FOR THE PROCESSING PASTERIZED CRAB MEAT

After studying the flow chart figure xx,1 we would like to make the following comments/amendments:

Comment 1. The second arrow from box No.2 **“Live crab holding XX.3.1.2”** joining box No.1. **“Live Crab reception xx.3.1.1”** should be diverted to join box No.3. **“washing/drowning/pacifying xx.3.1.3”** “because according to processing steps on page 86, after **“Holding”** it's supposed to go to step 3” which is **washing/drowning/pacifying xx.3.1.3”**

Comment 2. Cooling xx.3.1.11 (processing Step 11).

Bullet 3 The word **“chlorinated”** to be replaced with **“potable water”** should read: **“the water used at the cooling operation should be portable water in order to avoid recontamination of the product”.**

This flow chart is for illustrative purposes only. For in factory HACCP implementation a complete and comprehensive flow chart has to be drawn up for each process. Page 92

FIGURE xx.2 EXAMPLE OF FLOWCHART FOR CHILLED AND COOKED CRAB

After studying the flow chart **Figure xx.2** we would like to make the following comments/amendments:

Page 92 Figure xx. 2 Example of flowchart for chilled and frozen cooked crab.

We have noted that there is a missing arrow which should be coming from box” no 15” packaging labeling and storage xx.3.2.15”to a new box “no.5 cooling xx.2.3.5”

We propose that **the new arrow** between box” **no. 5 cooling 3.2.5”** and box **“no.8 cleaning/shell fragment removal xx.3.2.8”** to be removed and then an arrow to be inserted from **“cooking to cooling to sectioning** between box” **no.4 cooling 3.2.4”** and box” **no. 6.sectioning 3.2.6”** respectively.

XX3.2.5 COOLING (PROCESSING STEP 5) page 93

Bullet 5, we propose the word **“crab meat”** to be added and the sentence to read **“cooling in chill room must avoid cross contamination with raw crab meat”.**

Bullet 5 we propose to add the word **“used for cooling”** between **“water”** and **“should”** and to read **“the same water used for cooling should not be used for cooling more than one batch”.**

Bullet 8 we prefer the sentence to read: **“cooling baskets of the crab should not be placed on the floor”** instead of **“cooling crabs in basket should not be placed on the floor”.**

NEW ZEALAND

Draft Code of Practice for Fish and Fishery Products (Live and Raw Bivalve Molluscs)

New Zealand has no comments on this section.

Draft Code of Practice for Fish and Fishery Products (Lobsters and Crabs)

New Zealand has no comments on this section.