

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 4

CX/FFP 08/29/4

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 (Japan, Kenya, New Zealand)

JAPAN

We are pleased to submit the following comments on the “Draft Standard for Live and Raw Bivalve Molluscs”.

I- 5 HYGIENE AND HANDLING

I-5.3, the first two bullet points

Faecal coliforms and *Escherichia coli* in bivalve molluscs are indicator organisms which are used to assess the potential faecal contamination. Therefore, we believe that this issue should be more appropriately discussed under the “Draft Code of Practice for Fish and Fishery Products, Section 7-Live and Raw Bivalve Molluscs (7.2.2.1 *E. coli*/faecal coliforms/total coliforms)”, rather than being considered as the definite microbiological criteria under the Draft Standard for Live and Raw Bivalve Molluscs.

I-5.3, (iii), *Salmonella* and *Vibrio parahaemolyticus*

The 39th session of the Codex Committee on Food Hygiene (CCFH) agreed to develop the proposed draft Code of Hygienic Practice for *Vibrio* spp in Seafood (ALINORM 08/31/13) as a new work. Taking the above situation into consideration, we would like to propose to put the contents of the bullet point (iii) in the square brackets and forward this part to the CCFH, with the expertise in microbiological risk management, for its consideration.

I-5.3, (v)~(viii), Marine biotoxins

According to the recommendation from the 38th CCFH (paragraph 223, ALINORM 07/30/13), we would like to propose to create a new independent section “Contaminants”, and transfer the current bullet points (v)~(viii) of the Section I-5.3 under this new section “Contaminants”.

KENYA

PART 1-LIVE BIVALVE MOLLUSCS

1- 5 HYGIENE AND HANDLING

1-5.3 Kenya proposes “faecal coliforms” to be deleted since *E.coli* is a broader indicator for contamination. The sentence to read **Live bivalve molluscs shall not contain numbers of *E.coli* bacteria in excess of testing regimes as follows:**

1-5.3 Bullet 1 Kenya proposes that “c” shall be **nil** but not one and small “m” should be **nil** but not 2.3. In the process of Analysis none may contain any trace of *E.coli*.

Kenya proposes **Bullet 2** to be **deleted** since it is covered in bullet 1.

(iii) *Vibrio parahaemolyticus* 100MPN/g flesh is too high, the limit should be **absent** since it is a pathogen and a live bivalve molluscs is for direct consumption.

Kenya proposes that live bivalve molluscs must not contain any *Staphylococcus aureus* since it is a pathogen and the product is for direct consumption. The limit of 100/g is valid for those products which are meant for further processing.

(vii)The “**Roman numbers**” to be rectified in sequence order (iii) to (viii), that is (iv) is missing and (vii) is repeated.

NEW ZEALAND

Having regard to comments received back after consideration of this draft standard by the CCFH and CCMAS, New Zealand recommends the following amendments be made to the draft.

I-5.3 Microbiological standard for shellfish.

Most countries use an *E. coli* standard as an indicator of product safety. While *E. coli* is not a useful indicator of viral contamination, it is a more recent and arguably better standard than the faecal coliform standard. The concerns of CCFH can be best addressed by modifying the *E. coli* standard as drafted in the first bullet point in accordance with their recommendation and removing the second two-tier standard which essentially uses faecal coliforms as a screening test and an *E. coli* standard as the definitive standard.

New Zealand recommends the use of the $M=7$ *E.coli*/g upper limit due to the inherent imprecision of the MPN method.

It is important to use consistent units in the standard and utilise the ICMSF notation wherever possible so we suggest the first section of I-5.3 be deleted and replaced by the following text:

"Each lot of live bivalve molluscs shall not exceed the following limits when tested with an MPN method specified in ISO 16649-3 or by an equivalent method:

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."

This does not preclude countries using faecal coliform testing, especially as a screening method. If desired, this point could be added as a footnote.

The numbering in this section needs to be tidied up as it is out of order.

The reference to *Vibrio* in the current I-5.3 must specify pathogenic strains only. New Zealand notes that further work is to be done on *vibriosis* culminating in a Code of Hygienic Practice for *Vibrio* spp in seafood and this work will be lead by Japan, with a physical working group to be held in Japan. Accordingly it is suggested that finalisation of this section be postponed until the reports from the *vibrio* Working Group have been received by the Committees on Food Hygiene and Fish and Fishery Products.

I-7.4 Methods of Analysis - *E. coli*

The reference to the faecal coliform method becomes redundant if there is only an *E. coli* method required because there is only an *E. coli* standard.

I-7.1 Sampling

We note that the Codex General Guidelines at CAC/GL 50-2004 state that “Detailed sampling procedures do not lie within the scope of these general guidelines. If necessary, they should be established by the Codex commodity committees.”

In the case of live bivalve molluscan shellfish, there is a need for some further elaboration in this section as the definition of what constitutes a lot is critical to any sampling plan this needs to be specified. Because

live shellfish are primarily impacted by the water they are growing in, New Zealand proposes that the following text be added after the first sentence under I-7.1 (i) to read:

“A lot shall consist of not more than one day’s harvest of shellfish from a growing area.” This will ensure that a lot is as homogeneous as possible.

I 7.5 Determination of Biotoxins

New Zealand proposes that the table be retained with the toxin headings but only including the methods approved by CCMAS. A footnote should be inserted instead of the existing footnotes stating:

“Any method proposed for inclusion into this table must first be validated and approved by a suitably qualified body, for example AOAC or CEN and then be submitted by a member country to CCFFP for inclusion into the table. Applications for inclusion of any method will need to be accompanied by supporting documentation and be ratified by CCMAS.”

Some countries seem to be of the view that reference methods should be used for all testing. Typically reference methods are expensive to perform and may be technically complex and so beyond the technical and financial resources of many countries. It would therefore be unreasonable to require their use except in cases of disagreement as to the compliance of a consignment.

New Zealand therefore proposes that a second footnote be inserted to read:

"Any methods may be deemed suitable for screening purposes provided they are approved by a country's Competent Authority."

This will ensure that it is clear that the methods specified in the table only need to be employed in case of dispute rather than routinely.

II-7.1

In the case of raw bivalve molluscan shellfish, there is a need for some further elaboration in this section as the definition of what constitutes a lot is critical to any sampling plan this needs to be specified. Because raw shellfish are impacted both by the water they are growing in and handling/hygiene in the processing establishment, New Zealand proposes that the following text be added after the first sentence under II-7.1 (i) to read:

“A lot shall consist of not more than one day’s harvest of shellfish from a growing area and processed in one day in a processing establishment.”