



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS
Thirty-First Session
Tromsø, Norway
11 – 16 April 2011**

**DRAFT STANDARD FOR FISH SAUCE
COMMENTS AT STEP 6
(Canada and Philippines)**

CANADA

GENERAL COMMENTS

Canada appreciates the work of Thailand and Vietnam in preparing the revised *Proposed Draft Standard for Fish Sauce* and supports the approach taken in the proposed draft standard for fish sauce.

PHILIPPINES

The Philippines recognizes the efforts undertaken by Thailand and Vietnam in preparing the proposed draft standard for fish sauce and would like to submit the following recommendations/comments on the text:

On the Title

*The Philippines would like to propose to insert the terms “**naturally-fermented**” to the title of the draft standard to be more specific considering that the products covered are traditional products and not those resulting from acid hydrolysis. The title would read as:*

Proposed Draft Standard for **Naturally-Fermented** Fish Sauce

In Section 1 on SCOPE

The terms salt and only may further qualify the type of fermentation and exclude other means of producing fish sauce. Delete the last sentence.

This standard applies to fish sauce produced by means of salt fermentation only and may include other ingredients added to assist the fermentation process. The product is intended for direct consumption as a seasoning, or condiment or ingredient for food. ~~This standard does not apply to fish sauce produced by acid hydrolysis.~~

In Section 2.1 on Product Definition

To replace the description translucent, not turbid with the term clear and to further provide the colour range for clarity.

Fish sauce is a ~~translucent, not turbid~~ clear liquid product with a salty taste and fish flavour obtained from fermentation of a mixture of fish and salt. **Colour may vary from straw-yellow to amber.**

In Section 2.2 on Process Definition

Rewrite the sentence for clarity.

The product is prepared by mixing fish with salt and fermenting the mixture ~~is put~~ in covered containers or tanks. ~~Generally, the fermentation process takes not less than~~ for at least 6 months. **The liquid formed is extracted as fish sauce. Fermentation may be extended beyond 6 months** ~~may follow~~ by adding brine to ~~extract~~ the remaining **fish-salt mixture** ~~fish flavor and odour~~ until the liquid formed **is of the desired**

quality. The product shall meet the requirements of section 3.3. Other ingredients may be added to assist the fermentation process.

In 3.1.1 of Section 3.0 on Fish

Rewrite the text to emphasize the quality attributes required of the fish as a raw material.

Fish sauce shall be prepared from sound, wholesome fish in a condition and fit to be sold fresh for human consumption.

In 3.1.3 of Section 3.0 on Brine

*Replace subsection title Brine with **Water**. The material added to the fish is salt and water and not brine during the fermentation process. Likewise, the following text is suggested as replacement.*

~~Brine is a solution made from salt and potable water.~~ **Water for preparing brine shall be potable.**

In Section 3.2 on Other Ingredients

Suggested edit for clarity.

All other ingredients used shall be of food grade quality and conform to ~~with all~~ applicable Codex standards.

In Section 3.3.1 on Appearance

Revise the description of the quality attribute to be consistent with the proposed change in product description in Section 2.

Fish sauce must be ~~translucent, not turbid~~ **clear** and free from sediments except salt crystals.

In Section 3.4 on Chemical Properties

*The level of nitrogen has traditionally served as a measure of good quality and/or good tasting fish sauce. The level, however, varies slightly with the type of fish used. A level of 10 g/L (approx. 5.21% protein) is not always achieved for the species of fish used in the Philippines. We are therefore proposing a level of Nitrogen that would still represent good quality of fish sauce but which the industry can **viably** achieve. We thus recommend that the total N be specified as: “a minimum nitrogen content of **7.5 g/L**”*

In Section 8 on Labelling

Suggested edit for par 2 for clarity.

If during fermentation process, fish is mixed with salt or brine only, the fish sauce may be declared on the label as “natural fermentation” **or “naturally fermented”**.