



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

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Draft Standard for Quick Frozen Scallop Adductor Muscle Meat

COMMENTS AT STEP 6

(Australia, Canada, Indonesia, Thailand)

AUSTRALIA

General Comments

The scope of the proposed draft scallop standard currently covers the following product types:

- adductor muscle meat (raw or frozen);
- adductor muscle meat which has been processed using water and/or additives;
- frozen adductor muscle meat with roe on.

Bivalve products that are included in the bivalve standard (CODEX STAN 292-2008) are generally considered to require a higher level of risk management due to increased susceptibility to marine biotoxins and microbial contamination.

There is evidence which demonstrates that both scallop roe and scallop adductor muscle can contain significant levels of some marine biotoxins in extreme algal bloom events. For *Pecten maximus* and *Pecten jacobaeus* overseas studies have shown that if the domoic acid (ASP) concentration in the whole body (gut on) remains below 250 mg/kg then the concentration of toxin in the adductor muscle or roe will be below the regulatory limit of 20 mg/kg. This clearly demonstrates that adductor muscle and roe are of lesser concern with respect to marine biotoxin contamination than the whole scallop with gut on. Based on this information some overseas regulatory authorities allow scallops to be harvested when levels are much higher than the regulatory limits if the adductor muscle and/or roe is the marketed scallop component and end-product testing is also instigated. Nonetheless, at levels above 250 mg/kg (ASP) in the whole body, it is possible that roe and adductor muscle levels will exceed the regulatory limit for domoic acid in *Pecten maximus* and *Pecten jacobaeus*. Limited information is available as to whether other scallop species behave similarly regarding uptake and localization of various marine biotoxins.

Given that relatively little is known about the tissue distribution of key marine biotoxins in many scallop species, Australia recommends that the draft standard explicitly includes the need to undertake a country specific risk assessment of marine biotoxins in scallop adductor muscle and roe tissues. The risk assessment would need to consider key factors such as occurrence of toxic algal blooms, data on biotoxin levels in scallops (including levels in adductor muscle, roe and gut tissues), location of scallop beds, epidemiological evidence etc. An assessment of the potential for human sewage to impact scallop fisheries should also be made by the Competent Authority and if necessary risk management arrangements put in place to reduce risks related to potential microbiological contamination.

Risk management programmes should be put in place for scallop species and tissues which are demonstrated to be of elevated risk through the risk assessment process (note, an alternative approach would be to mandate across the board end product testing of scallop adductor muscle meat and roe, but this may be over precautionary if it can be demonstrated that the risk is negligible for particular species or geographical areas).

The inclusion of frozen roe on adductor muscle scallop products in the proposed draft scallop standard (REP 11/FFP Appendix VII) implies that it is considered that frozen roe on scallop products pose a lesser food safety risk as compared with fresh roe on scallop products. However, it should be noted that some contaminants are very stable on freezing and the risk will not be reduced significantly through this process (e.g. paralytic shellfish toxins). Australia therefore encourages CCFFP to establish a consistent approach for risk management of scallop roe, regardless of whether it is frozen or fresh.

To address the above points, *Australia recommends the following amendments to the draft Standard:*

a) Section 1 (Scope):

Australia considers that the standard should also apply to scallop meat with the roe attached, regardless of whether this frozen or fresh (see rationale above). To address this point Australia recommends the following alteration to the text:

‘The standard applies to bivalve species of the *Pectinidae* family fresh and quick frozen raw scallop adductor muscle meats in which the shell **and** viscera ~~and roe~~ have been removed, **and in which the roe may either be attached or removed**. This standard also applies to processed scallop meat products that have added water and/or food additives; ~~and frozen processed product can also be processed scallop meat with roe attached.~~’

Australia also recommends that the title of the Standard be altered as follows to accommodate the inclusion of scallop roe in the Standard:

‘Proposed Draft Standard for Fresh and Quick Frozen Raw Scallop (*Pectinidae*) Adductor Muscle Meat **with or without Roe** (at Step 5 of the Procedure)’

b) Section 5.2 (Contaminants):

Australia recommends the following alteration to the text (see rationale for change above):

‘The product shall not contain marine biotoxins exceeding the levels set out in Section I-5.2 of the Codex standard for live and raw bivalve mollusks (CODEX STAN 292-2008) ~~and as sampled and analysed in accordance with the same standard.~~ **Risk management protocols, including sampling and analysis protocols, for marine biotoxins in scallop adductor muscle meat and scallop roe should be informed by the findings of a comprehensive risk assessment. The risk assessment should establish whether key marine biotoxins are able to accumulate to significant levels in the adductor muscle and roe of the scallop species of concern. If the risk assessment demonstrates that levels above the regulatory limit can accumulate in adductor muscle and roe tissues, risk management (sampling and analysis) procedures should be established to prevent marketing of products that contain levels exceeding those set out Section I-5.2 of (CODEX STAN 292-2008).**’

Australia would also like to point out that the footnote associated with section 5.2 is no longer accurate due to the proposed inclusion of scallop roe in the draft standard and should be removed if the above text is inserted in the main body of the standard.

Specific Feedback:

Section 2.2.1

Australia recommends that the following text be inserted:

‘The recognised practice of repacking quick frozen products under controlled conditions which will maintain the quality of the product, followed by the reapplication of the quick freezing process as defined, is permitted. These products shall be processed and packaged so as to minimize dehydration and oxidation. **The quick frozen scallop products shall be maintained at minus 18°C or cooler throughout the repacking process or an alternative temperature specified for repacking (which has been validated to demonstrate it minimises the growth of pathogens that could adversely affect the fitness for human**

consumption of the product given the conditions they are to be stored, handled, loaded and transported).

Rationale: To avoid potentially hazardous microbes proliferating due to increases in temperature Australia recommends that products that are subjected to repacking as described in section 2.2.1 are required to be maintained under adequate temperature control to prevent the growth of pathogenic microorganisms.

c) Sections 3.1 and 3.2

Australia recommends that the following text be amended as follows:

‘The product shall be prepared from ~~sound~~ **safe** and wholesome scallops which are of a quality **and food safety standard** suitable to be sold fresh for direct human consumption’

Australia also recommends the inclusion of the following definition for ‘safe and wholesome’ as a footnote:

‘Safety and wholesomeness are related to a level of risk that society regards as reasonable in the context, and in comparison with other risks in everyday life.’

Rationale: Australia recommends replacement of the word ‘sound’ with the word ‘safe’. This change is recommended to be consistent with FAO terminology provided in the document ‘FAO Food & Nutrition Paper 65: Risk Management & Food Safety – Report of a Joint FAO/WHO Consultation, Rome, Italy 27-31 Jan 1997’. It is also recommended that a definition of ‘safe and wholesome’ be inserted as a foot note. Whilst quality food is always desirable, food safety is the paramount consideration. Australia recommends that the words ‘food safety standard’ are inserted to ensure that this is a primary consideration.

d) Section 8.5

Australia recommends that section 8.5 is removed.

Rationale: Unless there is a specific food safety concern and the proposed risk reduction steps (e.g. cooking procedures) have been demonstrated to reduce risk, Australia considers the methods by which scallops or other fish species are cooked is not the remit of Codex.

e) Section 9.4

Regarding the following text, Australia queries the level of 20% and requests information from the drafters as to the rationale for this specific level.

‘The presence of visible parasites on the near surface of the scallop adductor muscle shall not exceed 20% of individuals in the sample’

CANADA

GENERAL COMMENTS

1. Canada continues to support further discussions on the Proposed Draft Standard for Fresh and Quick Frozen Raw Scallop (Pectinidae) Adductor Muscle Meat. To support advancement of the Code, Canada is pleased to offer the following comments.
2. Note that, the titles of certain sections need to be revised to be consistent with the product definition titles in Section 2.1 “Scallop Meat” and “Scallop Meat Processed with Added Water” agreed to at the 31st session. For example the footnote #2 on the first page “Hereafter referred to in this Standard as ~~processed~~ scallop meat **product processed with added water**” and section 4.2 “Scallop Meat ~~Products~~ Processed with Added Water”.

SPECIFIC COMMENTS

3. **Section 1 – SCOPE**

Canada supports the previous CCFFP decision that processed scallop meat with roe attached remains within the scope of this Draft Standard for Fresh and Quick Frozen Scallop (Pectinidae) Adductor Muscle Meat. This decision requires some amendments to the ‘Product Definition’ (section 2.1) and the ‘Process Definition’ (section 2.2) and Canada has suggested such amendments below.

Canada feels that it is important to be clear and explicit on the types of scallop products covered by this standard, versus the Codex Standard for Live and Raw Bivalve Molluscs, and that cross-referencing or repeating provisions on both marine biotoxins hazards (as in Section 5.2) and microbiological hazards is important.

4. **Section 1**

2nd sentence, revise to read:

This standard also applies to **fresh and quick frozen processed scallop meat products that have processed with added water and/or food additives (with or without roe);** ~~Frozen processed product can also be processed scallop meat with roe attached.~~

2nd paragraph, item (ii), revise to read:

Live scallops and scallop meat in which the shell and **any viscera or roe** are attached. These products shall meet.....bivalve standard

Footnote 1 revise to read:

Hereafter referred to as scallop meat. **Note that scallop meat with roe attached without water, food additives, or other food ingredients are covered by the Codex Standard for Live and Raw Bivalve Molluscs.**

Reason: To simplify the language and further clarify the scope of this standard vs. the Codex Standard for Live and Raw Bivalve Molluscs.

Section 2 DESCRIPTIONS

Canada proposes clarifications to the Product Definition and Process Definition to accommodate the processed scallop meat product with roe attached.

Section 2.1 Product Definition

5. Revise Section 2.1.1 to read:

2.1.1 Scallop Meat

Scallop Meat is scallop meat without added water, food additives, or other food ingredients. Raw fresh or quick frozen scallop meat is prepared by completely removing the adductor muscle from the shell and completely detaching **all** the viscera ~~(including and roe) if applicable~~ from the adductor muscle of live scallops. The muscle is presented whole.

Reason: To provide a distinction between product types covered by this standard.

6. Revise section 2.1 to include the following Product definition:

“2.1.3 Scallop Meat with Roe Processed with Added Water

Fresh and quick frozen raw processed scallop meat with roe attached is prepared by deliberate addition of water and may contain food additives and/or salt.”

Reason: It is consistent with the Codex Procedural Manual outlining the format for Codex Standards (20th Edition) and it would improve clarity on the description of the processed scallop meat product with roe attached covered by this standard, Canada feels a separate product definition for process scallop meat with roe attached is needed to eliminate any possible confusion.

7. **Section 2.2 Process Definition:**

Canada suggests the inclusion of an additional process definition, section 2.2.3, for scallop meat with roe processed with added water. The following wording is proposed for this new section:

“2.2.3 Scallop Meat with Roe Processed with Added Water

Prior to processing, the marine biotoxin and microbiological hazards associated with live scallops should be sufficiently controlled to prevent unacceptable product from being processed.

The process definitions outlined in section 2.2.2 also apply to this product.”

Reason: To improve clarity on the description of the processed scallop meat product with roe attached covered by this standard, Canada feels a separate product definition for process scallop meat with roe attached is needed to address any possible confusion.

Section 6 – Hygiene and Handling

8. Canada suggests adding text in this section to address the microbiological hazards in the products defined in section 2.1.2 and 2.1.3 (i.e. scallop meat processed with added water (with or without roe)).

Include new wording as “new” section 6.4:

“6.4 Scallop meat with roe processed with added water shall comply with the hygiene controls set out in section I-6.4 and I-6.5 of the Codex Standard for Live and Raw Bivalve Molluscs (CODES STAN 292-2008) and as sampled and analyzed in accordance with the same Standard.”

Consequently, amend numbering of section 6.4 to section 6.5

- ~~6.4~~ **6.5** The product shall not contain any other substance in amounts which may present a hazard to health in accordance with standards established by the Codex Alimentarius Commission.

Reason: Microbiological hazard in roe-on scallop identified in the Codex Standard for Live and Raw Bivalve Molluscs should be cross reference in this Standard.

Section 7 – LABELLING

Section 7.1 Name of the Food

9. Canada supports the suggested wording for an optional requirement to add a qualifying term to scallop meat:

Revise to Read:

7.1 Name of the Food

The name of the product shall be:

- 7.1.1 (i) “~~X~~ scallops” if it conforms with the product description outlined in 2.1.1 or
 (ii) “processed ~~X~~ scallops with added water” if it conforms with the product description outlined in 2.1.2.
 (iii) **“X Scallops” or “ X scallops processed with added water” may be used where “X” is the common or usual name of the species of scallops according to the law, custom and practice in the country in which the product is to be distributed in a manner not to mislead the consumer.**

Reason: Canada considers the current requirement too prescriptive.

Section 7.3

10. Canada suggests deleting the square brackets for the following statement and revise to read:

¶ Water added as an ingredient to **processed** scallop meat (with or without roe) shall be declared in the list of ingredients⁵ and the percentage of scallop meat shall clearly appear on the label ¶

Reason: To avoid confusion. This requirement only applies to the processed products defined in section 2.1.2 and 2.1.3 and not “Scallop Meat” for which the deliberate addition of water is not permitted.

Section 9 – DEFINITION OF DEFECTIVES

Section 9.4 – Parasites

11. Regarding the statement in brackets (below), Canada is of the opinion that 20% is high and would welcome a discussion on this rejection limit. It should be noted that *generally*, in existing Codex Fish Standards, where an upper limit has been specified for a defect, a 5% tolerance has been applied. Our view is that the parasitic infestation rejection limits here should be consistent with existing Codex Fish Standards to the extent possible.

[The presence of visible parasites on the near surface of the scallop adductor muscle shall not exceed 20% of individuals in the sample]

Section 9.5 – Objectionable Matter

12. Canada agrees with the requirement of a 10 % tolerance for sample by weight for objectionable parts and a 10% of the sample by weight for sand or other similar particles and recommends deleting the square brackets around the following wording:

{10%} affecting more than 10% of the sample by weight

INDONESIA

Section 1. Scope (REP11/FFP, para. 97 and Appendix VII)

Indonesia would like to delete the last sentence in the third row: ~~frozen processed product can also be processed scallop meat with roe attached.~~

Reason:

Indonesia agrees that this standard is only for frozen scallop adductor muscle meat without viscera and roe.

Section 4.2 Scallop Meat Products Processed With Added Water

Indonesia would like to delete the following sentence: **Additives must be applied in conformance with section 3**, which is the third row from the sentence, and change with the following sentence: **Additives should comply with the requirements.**

The sentence (line 3) would read as:

Additives should comply with the requirements of the General Standard for Food Additives (CODEX STAN 192-1995)

Indonesia would like to delete the words **listed in Table 1 in the GSFA** from the sentence (line 6)

Reason:

Table 1 in the GSFA does not permit the use of phosphates in scallop adductor muscle meat product as the food category 09.2 (Process Fish and Fish Product including Mollusks, Crustacean, and Echinoderm) (09.2.1 Frozen Fish, Fish Fillet, and Fish product, including Mollusks, Crustacean, and Echinoderm).

Indonesia proposes maximum level of 2000 mg/kg as total phosphorus.

The sentence would read as:

Phosphates are allowed at a maximum level of 2000 mg/kg expressed in total of phosphor (including phosphates naturally present in the shellfish).

Section [7.3 Water added as an ingredient to scallop meat shall be declared in the list of ingredient and the percentage of scallop meat shall clearly appear on the label.]

Indonesia agrees to open the square brackets.

Reason:

If water added as an ingredient to scallop meat shall be declared means that water content that added and water that naturally presented in the scallop meat must be counted.

Section 9.4 Parasites

[The presence of visible parasites on the near surface of the scallop adductor muscle. shall not exceed 20% of individuals in the sample.]

Indonesia would like to delete all sentence in the square brackets of this section and propose to change with the following sentence: Parasites shall not be present on the surface of the scallop adductor muscle.

Reason:

Basically parasites in the form of larvae nor egg shall not be present in scallop adductor muscle product because parasites that divided into two namely parasitic zoonoses and non-parasitic zoonoses can cause variety of disease condition to human.

Section 9.5 Objectionable matters

Point i) Indonesia agrees to open the square brackets for the percentage of 10%.

Point ii) Indonesia would like to delete the sentence in the square brackets and propose to change the sentence in point ii) with the following sentence:

sand or other similar particles shall not be visible in the thawed state or detected by chewing during sensory examination.

Additional comments

Indonesia would ask for clarification regarding determination of the percentage of sand in scallop adductor muscle product.

THAILAND

Thailand would like to express our appreciation to Canada for preparing this document. We would like to propose our comments on specific sections as the followings:

1. SCOPE

Considering, the scope which indicates that “This standard applies to bivalve species of the *Pectinidae* family fresh and quick frozen raw scallop adductor muscle meats in which the shell, viscera and roe have been removed.” This standard also applies to processed scallop meat products that have added water and/or food additives; frozen processed product can also be processed scallop meat with roe attached.”

We feel that it makes some confusion, so we would like to request for clarification on the current scope, particularly “the products with roe attached” and “the products that roe have been removed”.

2. DESCRIPTION

2.3 Presentation

3rd bullet which state that

- If the scallop meat pack exhibits the presence of broken pieces that is > 5% of the sample weight, then the product must be presented as “pieces” or terms to that effect.

It is proposed that the requirement on the presence of broken pieces should be > 10% of the sample weight.

7. LABELLING

The declaration of water added as an ingredient in the list of ingredients and the percentage of scallop meat on the label will provide benefit for consumers. So, a square bracket should be removed from section 7.3.

9.4 Parasites

We would like to confirm our position that the requirement on the presence of visible parasites at “not exceeds 20%” of individuals in the sample is too high. We are of an opinion that the requirement should concern and indicate the maximum level for only parasites that cause illness.

9.5 Objectionable matter

Subsection i)

A square bracket should be removed from [10%].

Subsection ii)

The requirement on sand or other similar particles at more than 10% of the sample by weight is too high. So, it is proposed that this requirement should be reviewed.