



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

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Proposed Draft Revision of the Procedure for the Inclusion of Additional Species in Standards for Fish and Fishery Products

COMMENTS AT STEP 3

(Argentina, Canada, Colombia, Costa Rica, Ghana, Thailand)

ARGENTINA

Argentina expresses its appreciation for the opportunity to make the following comments.

GENERAL COMMENTS

With regard to the PRINCIPLES OF THE SENSORY TESTING PROCEDURE (SUBPARAGRAPH 3.3), we understand that it is necessary to explain explicitly the basic requirements a laboratory should meet to be recognised and accredited in accordance with the terms set out in this subparagraph.

We understand that this analysis will be central to the Committee's future work, which is why we consider it a priority that this document specifically define the bases for laboratory recognition and the operational methods.

CANADA

GENERAL COMMENTS

Canada appreciates the work of Chile and France in leading the electronic working group in revising the proposed draft procedural document.

Canada can support the revised document as the procedures have been modified for practical use, provided that certain issues are addressed and important clarifications are made.

We would like to offer the following comments:

SPECIFIC COMMENTS

1. Section 1 – SCOPE, regarding the clause “*This procedure will not be applied to . . .*”

Delete the square brackets from the last sentence as follows: { This procedure will not be applied to species currently included in a standard or species dedicated for non-food industry }.

Reason: Canada's recommendation reflects the decision reached at the 30th Session of the CCFFP (2009) where the Committee was reminded that it had **decided** in principle to the “non retroactive application” of the proposed draft revised Procedure (Alinorm 10/33/18, para 118) and that the Committee had included a provision to deal with this matter in the Proposed Draft Revised Procedure (see Alinorm 10/33/18, Appendix VIII, para 2.)

2. Section 2.1 PROPOSING MEMBER

Bullet # 3, regarding the clause “Proposes three species, the most representative of the market, to be compared with the candidate species”

Regarding the 1st question posed in the Recommendation section of this paper (CX/FFP 12/32/10) on “How and who will select the 3 species that will be compared with the candidate species. It is suggested that these are proposed by the proposing member and approved by the Committee, by consensus”, Canada agrees with the requirement as stipulated in Section 2.1 – Proposing Member, bullet # 3 that the proposing member should suggest the species for comparison which will be endorsed by the Committee.

3. Section 2.2 COMMITTEE

3rd bullet, (b) regarding the clause “However, where the Committee . . .”

Revise to read: “However, where the Committee is in doubt as to whether the candidate species should be included in a processed product standard based on the above information, the Committee may decide to form an **intersession** working group to oversee sensory testing of the product(s) of the candidate species.”

If accepted, Canada recommends that consequential changes should be made throughout the document to align with the proposed wording. For example: title of Section 2.3 should be revised to read “**INTERSESSION WORKING GROUP**”.

Reason: The proposed amendment clarifies that work will be managed and conducted between sessions by the working group established and mandated by this Committee. The work associated with such a working group could not be practically accomplished during an intrasession working group.

4. Section 2.3 WORKING GROUP

Canada is of the understanding that it is the Working Group’s responsibility (and not the leading laboratory) to prepare a report on sensory assessment based on 3 independent laboratory reports as part of the overall report to be developed for the Committee’s consideration. This was established in bullet # 3 and # 4 which state “*Examines the laboratory report of the sensory evaluation*” and “*Informs the Committee if the candidate species satisfy the requirements for the inclusion in the relevant standard*”. The action of informing this Committee would be accomplished through a report as stipulated in the ‘Codex Guidelines on Physical Working Groups’ of the Codex Alimentarius Commission Procedural Manual.

If Canada’s understanding is correct, Canada suggests consequential changes to the following provisions:

- Section 2.2 Committee, 4th bullet, regarding the clause “*Decides which of the laboratories...*”

Revise to read: “Decides which are the laboratories selected to perform the sensory evaluation and designates the leading laboratory in charge of coordinating the assessment ~~and preparing the final report.~~”

- Section 3-3 Principles of the Sensory Testing Procedure, Para 1, last sentence, regarding the clause “*The Committee has to designate . . .*”

Revise to read: “The Committee has to designate one of the three laboratories as the leading laboratory, which will coordinate the tasks ~~and will prepare the report on sensory assessment~~”

5. **1st Bullet, regarding the clause “Reviews [eventually] the documentation . . .”**

Revise to read: “Reviews ~~[eventually]~~ the documentation provided by the proposing member(s).”

Reason: Canada supports deleting the term “eventually” and is of the opinion that this term is unnecessary for the carrying out the Procedure.

6. **2nd Bullet, regarding the clause “Supervises the sensory tests”**

Revise to read: ~~Supervises~~ **Oversees** the sensory ~~tests~~ **testing procedure.**

Reason: This editorial revision aims to harmonize the use of the terms:

- “oversee” which is already used earlier in the Procedures. (see Section 2.2 Committee, b) which states “*However, where the Committee is in doubt as to whether the candidate species should be included in a processed product standard based on the above information, the Committee may decide to form a working group to oversee sensory testing of the product(s) of the candidate species.*” The term “supervise” can be interpreted as a physical audit or function which is not intended, and;
- “sensory testing procedure” which is already used in the Procedures (see Section 3-3 PRINCIPLES OF THE SENSORY TESTING PROCEDURE)

7. **Last provision, regarding the clause “[If a working group is not established . . .”**

Delete the square brackets: {If a working group is not established then the tasks of the working group will be conducted by the Committee.}

Reason: Canada is not opposed to retaining this provision.

Section 3.1 CANDIDATE SPECIES DESCRIPTION

8. **Para 1, 1st sentence, regarding the clause “To be valid, the information . . .”**

Revise to read: “To be valid, the information provided should originate from ~~an internationally appropriate~~ recognised institution(s) ~~{the Committee develops a list of approved institutions}~~ or **credible** sources, e.g. ~~internet~~, literature databases, ~~{provided that in every case its veracity can be proven}~~.”

Reason:

Canada does not support the inclusion of the clause: “*the Committee develops a list of approved institutions*” and is concerned with the rationale, logistics and process to develop and maintain such a list by this Committee. Canada prefers to retain the requirement included in the current Procedure (CL 1995/30-FFP) which is “appropriate recognised institutions”.

Canada does not support the inclusion of the clause: “*provided that in every case its veracity can be proven*” and is of the view that appending the term “credible” to “sources” (of information) would be adequate to promote the scrutinization of the information presented to the Committee.

9. **Para 2, (a), regarding the clause “The internationally recognized scientific name . . .”**

Revise to read: “The ~~internationally recognised~~ scientific name, either from **a credible source** e.g. FISHBASE, or if appropriate by attestation from ~~a{an internationally}~~ **appropriate** recognised institution(s) ~~{at a national, regional or international level}~~;

Reason: Regarding the 2nd question posed in the Recommendation section of this paper (CX/FFP 12/32/10) on “*if the scientific name of the candidate species information must be published by an internationally recognized institution or if it will be possible for this information to be published by an institution recognized only at national or regional level*”, Canada prefers to retain the requirement included in the current Procedure (CL 1995/30-FFP) which is “appropriate recognised institution”.

Our revision is aimed at harmonizing with the Canadian comments from “para 1, 1st sentence” above.

10. **Para 2, (d), regarding the clause “Where appropriate, depending on the product ...”**

Revise to read: “Where ~~appropriate~~ **available and if necessary**, depending on the product (~~e.g. canned fish~~), specific DNA and/or electrophoretic protein profile sequence from international database(s).”

Reason: Canada questions why this requirement is more “appropriate” and necessary for canned fish compared to other product formats and is of the opinion that including any example should be avoided and thus applying this provision to all product presentations. We are of the view the language of this provision should provide sufficient flexibility to consider the need to use analytical analysis, given the information provided in Para 2(c) and that this type of information may not be necessary for decision making by the Committee.

11. **Section 3 – 2 ECONOMIC DATA OF THE CANDIDATE SPECIES**

Add a new sentence before “3.2.1 RESOURCES” as follows: “**Information should be obtained relevant to the potential for meaningful trade of the candidate species. Examples include but are not limited to:**”

Reason: Canada is of the opinion that a guiding principle statement should preface this section and then follow up with a list of examples. This guidance would facilitate the proposing country in satisfying Section 3-2 ECONOMIC DATA OF THE CANDIDATE SPECIES with the understanding that the information outlined in Section 3-2-1 RESOURCES and Section 3-2-2 PROCESSING TECHNOLOGY AND MARKETING are examples and may not be available in every case.

12. **Item (b), regarding the clause, “Yearly catches or . . .”**

Delete the square brackets: b) Yearly catches or the aquaculture production of the candidate species, preferably {at least} for the past 5 years [, if data are available].

Reason: Canada is not opposed to retaining these descriptive terms as the terms “preferably” and “if available” offer sufficient flexibility in meeting this provision.

13. **Item (c), regarding the clause, “Estimate of volume of stocks . . .”**

Delete the square brackets: “{ (c) Estimate of volume of stocks present in the natural environment if available}”

Reason: Canada is not opposed to including an estimate of stock, *if available*, as this would be useful information to have. However, Canada would have reservations for the Committee to use this information to decide/agree if the species stock is sufficiently abundant to allow for commercial fishing. Canada acknowledges that the Committee does not assess other provisions in the resource section such as item (b) “*yearly catches or the aquaculture production of the candidate species ...*” The assessment of potential resources would be outside the Codex mandate.

14. **4th Provision, regarding the clause “(Characteristics connected to market value . . .”**

Canada would like to seek clarification on what is meant by the clause: “(Characteristics connected to market value such as: frequencies (length, height, amount of meat) but also, colour fish meat, frequencies roe, etc.)”

Reason: This provision needs to be better defined before discussions can take place on its inclusion in the proposed Procedure.

Section 3.2.2 PROCESSING TECHNOLOGY AND MARKETING

15. **Item (a), 4th Bullet, regarding the clause “annual production (preferably [at least . . .”**

Delete the square brackets: “annual production (preferably {at least} for the past 5 years { if data are available}).

Reason: Canada is not opposed to retaining these descriptive terms as the terms “preferably” and “if available” offer sufficient flexibility in meeting this provision.

16. Item (b), regarding the clause “Data on international trade . . .”

Delete the square brackets: “(b) Data on international trade of food products derived from the species (yearly quantity and values preferably [at least] for the past 5 years [if data are available])”

Reason: Canada is not opposed to retaining these descriptive terms as the terms “preferably” and “if available” offer sufficient flexibility in meeting this provision.

17. Item (b), regarding the clause “status: frozen, fresh, alive”

Canada would like to seek clarification on what is meant by the clause: “*status: frozen, fresh, alive*”

Reason: This provision needs to be better defined before discussions can take place on its inclusion in the proposed Procedure.

Section 3-3 PRINCIPLES OF THE SENSORY TESTING PROCEDURE**18. Para 1, 1st sentence, regarding the clause “The sensory testing procedure . . .”**

Revise to read: “The sensory testing procedure has to be carried out by three ~~independent~~ laboratories¹ ~~accredited~~ with relevant expertise in sensory assessment of fish and fishery products.”

Delete: “footnote 2” which states “*Laboratories should be accredited by a Government institution or by an internationally recognized certifying company*” and

Delete the two terms: “independent” AND “[accredited]”

Reason: Canada is of the opinion that laboratories that follow the “*Codex Guidelines for the Sensory Evaluation of Fish and Shellfish in Laboratories (CAC GL 31-1999)*” as described in Para 2 of this section would be fit for purpose in the context of executing the inclusion of additional species procedure.

19. Para 1, 2nd sentence, regarding the clause “Ideally, the three laboratories . . .”

Delete the square brackets: “Ideally, the three laboratories should be chosen from different Codex regions [, excluding the proposing member (s)].”

Reason: Canada is not opposed to retaining this provision as it will ensure that the selection of laboratories remains unbiased.

20. Para 1, 5th sentence, regarding the clause “These three laboratories have . . .”

Delete the square brackets: “ [These three laboratories have to be recognised by the Committee as suitable for the task] ”

Reason: Canada is not opposed to retaining this provision.

21. Section 4 – REPORT OF THE SENSORY ASSESSMENT OF THE CANDIDATE SPECIES**Para 2**

Delete text in square brackets: The report on the sensory evaluation should make clear whether processed products from the candidate species are or are not significantly different from products covered by the relevant standard ~~[and specific products derived from the reference species].~~

Reason: Canada supports limiting the comparison of the candidate species to existing species in the relevant Codex Standard. The use of “reference species” has not been defined in this document and including such a concept would not conform with Section 3-3 PRINCIPLES OF THE SENSORY TESTING PROCEDURE, provision (b) of this document which outlines - “*The species to be compared (candidate species and at least three species currently included in the Description section of the pertinent standard).*”.

Canada maintains the view that a comparison process which would incorporate a “reference species” is not readily transparent, criteria for determining an acceptable “reference species” are lacking and the application of the comparison results would be unclear.

22. **Canada would appreciate guidance from the Codex Secretariat on where this procedure would be located or referenced after this matter has been resolved by the Com**

COLOMBIA

Colombia is pleased to submit the following comments regarding the document “Appendix II Proposed Draft Revision of the Procedure for the Inclusion of Additional Species in Codex Standards for Fish and Fishery Products” at Step 3 of the Procedure, sent by the Codex Alimentarius Commission Secretariat.

In the following, we have used as the reference the Spanish version of the document annexed to CX/FFP 12/32/10.

I. SECTION I. SCOPE

GENERAL COMMENTS

The Fish and Fishery Products Subcommittee considers it necessary to clarify the reason why in this Proposed Draft sensory evaluations are the most important criterion for the inclusion of new species and why other criteria, such as physical-chemical analysis, microbiological analysis and risk factors of the species for consumers, are not taken into account.

It is recommended this criterion be reconsidered in the Proposed Draft.

II. SECTION 2.1 PROPOSING MEMBER

This clarification is required so that an appropriate comparison can be made of the candidate species for inclusion. Compare the new species with that from the same ocean and/or continental marine environment.

III. SECTION 2.2. COMMITTEE

This clarification is necessary to objectively assess the economic potential of the candidate species..

IV. SECTION 3.1. CANDIDATE SPECIES DESCRIPTION

The phrase “as appropriate” introduces an element of confusion. There is no clarity as to the cases in which this request may be made.

V. SECTION 3.2. ECONOMIC DATA OF THE CANDIDATE SPECIES

3.2.1 RESOURCES

It is recommended including “or aquaculture areas” since this may increase the economic data obtainable for the candidate species.

VI. SECTION 4. REPORT OF THE SENSORY ASSESSMENT OF THE CANDIDATE SPECIES

What does significantly different mean. It is considered that the phrase is the contrary, because the candidate species is the one that is being processed and from which the products are derived (FILLETTS, MINCED FISH FLESH PRODUCTS, Etc..)

COSTA RICA

Costa Rica expresses its appreciation for the opportunity to make the following comments on the document **CX/FFP 12/32/10** Proposed Draft Revision of the Procedure for the Inclusion of Additional Species in Standards for Fish and Fishery Products.

Costa Rica requests that changes be made to the document wording as set out below:

Introduction:

In Costa Rica, there is the Instituto Costarricense de Pesca y Acuicultura (INCOPECA) the responsibilities of which include the sustainable use of the biological resources of the sea and aquaculture.

At present, the country does not have a standard procedure for including new species of fish products in the country and as such the Codex Alimentarius document is an important basis for this activity in Costa Rica.

Justification:

With regard to Appendix II of the Proposed draft, it is stated in section 2 Responsibilities and Division of Committee Decisions, that the proposing member (2.1) must provide the Committee—if it so requests—the three most representative species on the market to compare them with the candidate species. With regard to this paragraph, Costa Rica considers that it is important to explain the technical reasons why this request is made, since the parameter for inter-species comparison does not provide any scientific argument for selecting the “most representative” species, so it must be selected using a parameter that refers to the taxonomic data of species similar to that for which inclusion is requested. The same applies to point 2.2 Committee, sub-paragraph “b”, bullet point 2 “Decides which are the species selected to be compared with the candidate species”.

In point 2.2 Committee, part “b”, bullet point 3: “Reviews the report of the Working Group on sensory evaluation”, Costa Rica considers the mechanism used for the said sensory evaluation needs to be established and that a reference be made to the Codex document to be used for this purpose. Further, Cost Rica considers that the sensory evaluation should state whether the acceptance or rejection is based on sensory parameters alone or backed by the results of laboratory analyses.

In point 3.3 “Principles of the sensory testing procedure”, the first paragraph states: “...The sensory testing procedure has to be carried out by three [accredited] independent laboratories...”. Costa Rica considers that this needs to be clarified as follows: “...The sensory testing procedure has to be carried out by three independent laboratories accredited under Standard INTE ISO 17025:2005 by an ILAC member...”

In point 3.3, it is stated in lines 5 and 6: “The Committee may decide to choose other laboratories than those suggested”, Costa Rica considers that the acceptability criteria for a laboratory must be referenced in a Codex document, in which it is possible to prove its aptitude, and not the criteria, which can be seen as a non-objective way to select them, since the criteria under which laboratories other than those presented may be considered are not known.

In point 4, regarding the Report of the sensory assessment of the candidate species, Costa Rica considers that the document should provide a standard or model with the minimum data it should contain and stating which are the comparative parameters against which it will be assessed.

GHANA

Comment: 1.SCOPE

We propose that the square bracket be removed as the revision of this should not apply to species currently included in standard or species dedicated for the non–food industry.

This procedure does not apply to species currently included in a standard or species dedicated for the non-food industry.

Comment: 2.3. WORKING GROUP

We recommend that the texts in the square brackets be deleted.

“Reviews ~~eventually~~ the documentation provided by the proposing member(s).

~~“If a working group is not established then the tasks of the working group will be conducted by the Committee.”~~”

Rationale: The final draft document would be reviewed irrespective of the timing, thus introducing the word eventually is inappropriate. Similarly, the Committee would have to establish a working group to facilitate and enhance effective collation of data in the development process.

Comment: 3.1. CANDIDATE SPECIES DESCRIPTION

Ghana proposes that the sentence reads:

To be valid, the information provided should originate from an internationally recognized institute(s) ~~{the Committee develops a list of approved institutions}~~ or sources, e.g. internet, literature databases, **provided that in every case its veracity can be proven.**

Species description should include, in order to allow the identification of the products (both as whole fish and commercially processed products):

a. The internationally recognized scientific name, either from e.g. FISHBASE, or if appropriate by attestation from a **(n) internationally** recognized institute(s) **at a national, regional or international level**;

Rationale: We recommend maintaining the proposed text. This emphasizes and ensures traceability of all relevant information during the inclusion process.

Comment: 3.2. ECONOMIC DATA OF THE CANDIDATE SPECIES

Ghana suggest that the proposed text “at least” be deleted in clauses 3.2.1b, 3.2.2 a and b; while retaining all other proposed texts in square brackets as follows;

3.2.1. Resources

b) Yearly catches or the aquaculture production of the candidate species, preferably [~~at least~~] for the past 5 years, **if data are available**.

c) Estimate of volume of stocks present in the natural environment if available.

3.2.2. Processing technology and marketing

a) Data on processed products of the candidate species

- types of marketed products,
- trade names used,
- main processing treatment(s) e.g. canning, marinating, smoking,
- annual production (preferably [~~at least~~] for the past 5 years **if data are available**).

b) Data on international trade of food products derived from the species (yearly quantity and values preferably [~~at least~~] for the past 5 years **if data are available**)

- **status: frozen, fresh, alive,**
- production data,
- import/export data

Rationale: The duration for collating economic data of the candidate species should not be limited provided data is available on resources, technology and marketing.

Comment: 3-3 PRINCIPLES OF THE SENSORY TESTING PROCEDURE

Ghana agrees with the proposed text. We recommend that the square brackets be removed.

“The sensory testing procedure has to be carried out by three **accredited** independent laboratories with relevant expertise in sensory assessment of fish and fishery products. Ideally, the three laboratories should be chosen from different Codex regions, **excluding the proposing member (s)**. The proposing member(s) may at this stage of the procedure suggest the three laboratories that can carry out independent verification. The Committee may decide to choose other laboratories than those suggested. **These three laboratories have to be recognized by the Committee as suitable for the task.**”

Rationale: Ghana is of the opinion that the above text adequately covers the principles

THAILAND

Thailand would like to express our appreciation to Chile and France for preparing this document. We would like to propose our comments on specific sections as follows:

Scope

We are of an opinion that the decision on whether the species is food should be based on considering history or information on using that species in food production ,consumption volume (different in each country) or trade volume.

It is agreed that the document should not include species intended for non-food industry. So, a square bracket should be removed from the last sentence of this section as follows: “~~¶~~ This procedure does not apply to species currently included in a standard or species dedicated for the non-food industry.~~¶~~”

Section 2.3 WORKING GROUP

It is proposed that a square bracket should be removed from the word “~~eventually~~” and the sentence “~~If a working group is not established then the tasks of the working group will be conducted by the Committee~~”.

Section 3.1 CANDIDATE SPECIES DESCRIPTION

First paragraph

From our understanding, the sentence “the Committee develops a list of approved institutions” means that the committee is responsible to prepare a list of approved institutions, whereas other internationally recognised organizations can propose the committee to approve additional institutes to be included in the list.

For the texts “provided that in every case its veracity can be proven”, we agreed that obtained information should be reliable or proven.

So, it is proposed to remove a square bracket from the texts “~~the Committee develops a list of approved institutions~~” and “~~provided that in every case its veracity can be proven~~”

Subsection a)

Scientific name could be frequently changed as a new species is regularly found by a research. So, to follow current information is important. And, from our point of view, FAO can provide reliable information.

For the recognised institute(s) that can propose scientific name, it is proposed that “Catalog of Fishes” should be included in the examples of the institute(s). In addition, a square bracket should be removed from the texts “at a national, regional or international level”; since these recognized institute(s) could be a national, regional or international level.

Therefore, this subsection should be read as follows:

“a. The internationally recognised scientific name, either from e.g. FISHBASE, Catalog of Fishes or if appropriate by attestation from ~~an internationally~~ recognised institute(s) ~~at a national, regional or international level~~.”

Section 3.2.1 Resources

In our views, the amount of fish is currently decreasing due to temperature change of the ocean current. Fish in a cold climate would not be much impacted; meanwhile fish in tropical climate is highly impacted. Moreover, the estimation of fish volume would aims to observe a trend of the production of the specific fish which is only information for decision of a trading partner.

So, our comments are as the followings:

Subsection b): The texts “at least” should be deleted and a square bracket should be removed from “if data are available”.

This section should be read:

b) Yearly catches or the aquaculture production of the candidate species, preferably ~~at least~~ for the past 5 years ~~if data are available~~.

Subsection (c) should be deleted, because information in (b) already cover those included in (c).

~~(c) Estimate of volume of stocks present in the natural environment if available.~~

It is proposed to add “*if available*” at the end of this texts to provide flexibility, when impractical. So it should be read:

“(Characteristics connected to market value such as: frequencies (length, height, amount of meat) but also, colour fish meat, frequencies roe, etc., *if available*)”.

Section 3.2.2. Processing technology and marketing

Subsection a) Data on processed products of the candidate species

- annual production (preferably [at least] for the past 5 years [if data are available]).

The word “at least” should be deleted, and a square bracket should be removed from “if data are available”.

Subsection b) Data on international trade of food products derived from the species (yearly quantity and values preferably [at least] for the past 5 years [if data are available])

- [status: frozen, fresh, alive,]

It is acceptable for Subsection (b) to concern information on product in terms of international trade volume and import or export volume. It is proposed that the word “at least” should be deleted, meanwhile a square bracket should be removed from “if data are available’

Therefore, this section should be read:

a) Data on processed products of the candidate species

- annual production (preferably ~~for the past 5 years~~ for the past 5 years ~~if data are available~~).

b) Data on international trade of food products derived from the species (yearly quantity and values preferably ~~for the past 5 years~~ for the past 5 years ~~if data are available~~)

- ~~status: frozen, fresh, alive,~~

Section 3-3 PRINCIPLES OF THE SENSORY TESTING PROCEDURE

In first line, a square bracket should be removed from “accredited” because it is agreed and appropriate to indicate that the three laboratories should be accredited in sensory assessment of fish and fishery product.

In 3rd line, a square bracket should be removed from “excluding the proposing member (s)” because it is agreed that the three laboratories should be chosen from different regions, not including the proposing member (s)]. and

In 5th line, a square bracket should also be removed from “These three laboratories have to be recognised by the Committee as suitable for the task” because it is agreed that the three laboratories should be recognised by the Committee as suitable for the task.