



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

Thirty-third Session

Bergen, Norway

17 – 21 February 2014

**DRAFT STANDARD FOR RAW, FRESH AND QUICK FROZEN SCALLOP PRODUCTS
(At Step 6 of the Procedure)**

Comments submitted by Egypt, European Union, France, Norway and United States of America

EGYPT

2.2.1 Scallop Meat and Roe-on-scallops

Suggest:

After removal of the shell, viscera, and roe as applicable, under good hygiene practices, the product is rinsed, **drained**, and stored with a method that minimizes absorption of water to the extent that is technologically practicable. The fresh product shall be kept **at 4°C to below freezing temperature**. Product, intended to be frozen shall be subjected to a freezing process ~~carried out in appropriate equipment~~ in such a way that the range of temperature of maximum crystallization is passed quickly (**at -18°C**), in accordance with the requirements of the *Code of Practice for the Processing and Handling of Quick Frozen Foods* (CAC/RCP 8-1976).

Justification:

It is recommended that rinsing is followed by draining especially when freezing process is applied. The statement (in such a way) is preferable and quite enough as it includes both the appropriate equipment and the applied method. Mentioning the suitable freezing temp(. at -18°C) that minimizes the maximum crystallization is essential as a guidance for application.

The recognized 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.

Comment :

It is Egypt's view that defrosting and refreezing are not permitted during repacking and that the steps of repacking and reapplication of the quick freezing should be if applied included in the Code of practice for the processing of fresh and quick frozen raw scallop meat[with or without roe], figure X.1 :example of flow chart of processing of scallop meat.

2.2.2 Quick Frozen Scallop Meat Processed with Added Water and/or solution of water and phosphates

After removal of the shell, viscera, and roe as applicable, under good hygiene practices, the product is rinsed and stored with a method that minimizes absorption of water to the extent that is technologically practicable. The fresh product shall be kept at or below 4°C. The product is subject to the addition of water and/or phosphate solution (e.g., soaked, sprayed). The **amount of added solution shall be controlled and accurately measured** for labelling purposes. Product, intended to be frozen shall be subjected to a freezing

process carried out in appropriate equipment in such a way that the range of temperature of maximum crystallization is passed quickly, in accordance with the requirements of the *Code of Practice for the Processing and Handling of Quick Frozen Foods* (CAC/RCP 8-1976).

Comment :

Egypt suggests that both the amount and the time of contact-dipping- of the added solution to be accurately controlled as both of them are factors affecting the water uptake percentage of the final product later on.

The recognized 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.

2.3 Presentation

Any presentation of the product shall be permitted provided that:

- **It meets all requirements of this standard**, and it is adequately described on the label to avoid confusing or misleading the consumer.
- The scallop meat may be packed by count per unit weight.
- 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.

Comment :

Egypt would like to draw the attention to the importance of not only meeting the requirements of this standard but also the other relevant standards that were referred to throughout this draft as the code of practice and the mollusks standard

3.4 Glazing

Suggest:

If glazed, the water used for glazing or for preparing glazing solutions shall be potable water¹ or clean water². **and all ingredients that are included in for that to be of food grade.**

Justification:

It is suggested referring here that all ingredients included in preparing the glazing solutions are to be of food grade

5. CONTAMINANTS.

5.2 The product shall not contain marine biotoxins⁴ exceeding the levels set out in section I-5.2 of the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008) and as sampled and analysed in accordance with the same Standard .

i) Scallop Meat – When prepared in accordance with the *Code of Practice for Fish and Fishery Products* (CAC/RCP 52-2003) – section “X” [under elaboration], marine biotoxins are not reasonably likely to present a hazard in scallop meat. While the hazard analysis will consider marine biotoxins as a potential hazard, **this hazard will be excluded or included based upon the species and the available data for toxins in that species.**

Comment:

Egypt supposed that any used species must not constitute a hazard concerning public health through acquiring the relevant knowledge about the scientific name of different utilized species- and the appropriate data with regard to its possible marine biotoxine content and these information should be available through the trade processes.

7.1.3 In addition to the name identified in 7.1.1 and 7.1.2, the product shall be identified by common and/or scientific names as determined by the competent authority. **The country where the product is sold can determine if the scientific name must be indicated on the label.**

Suggest:

7.1.3 In addition to the name identified in 7.1.1 and 7.1.2, the product shall be identified by common and scientific names as determined by the competent authority. **The country where the product is sold can determine if the scientific name must be indicated on the label.**

Comment:

It is Egypt point of view that the scientific name shall be indicated along with the common name on the label for conformity with the requirement at 5.2 concerning exclusion or inclusion of marine biotoxins as a potential hazard based upon the species and the available data for toxins in that species.

7. LABELLING**Suggest:**

Egypt proposes grading scallops by size as small, medium, large, very large and indicating this grade on the label for better quality assessing

7.3 Water added as an ingredient to scallop products shall be declared in the list of ingredient⁵ and the percentages of scallop meat and percentage of added water shall clearly appear on the label.

Comment:

Egypt would prefer using the same expression to indicate the amount of water added to the scallop in both items 3.3 and 7.3 – water uptake or percentage of added water, at the same time it is suggested that both the net and drained weight should be indicated to the label

7.4 Net Contents (Glazed Products)**8.4 Determination of Net Weight****[8.7 Determination of added water]****Comment:**

Egypt suggests that indicating the net and drained weight on the label by the importing country would be of great help concerning assessing the quality and to avoid consumer misleading

EUROPEAN UNION**2. Description:**

The EUMS would like to slightly modify the definitions in sections 2.1.3 and 2.1.4 in order to make it clear that addition of phosphates only apply to frozen scallop meat and roe-on scallops and not fresh products.

Modification proposal:**2.1.3 Quick Frozen Scallop Meat or Roe-on Scallops Processed with Added Water and with solution of water and phosphates**

Quick frozen “scallop meat”, or **quick frozen** “Roe-on scallops”, with added solutions of water and/or phosphates contain the products defined in 2.1.1. and 2.1.2, and a solution of water and/or phosphates and optionally salt.

2.1.4 Fresh Scallop meat, Roe-on Scallops with added water

Fresh scallop meat or roe-on scallops **processed** with added water contain **only** the **fresh** products defined in 2.1.1, 2.1.2 and added water.

The proposed text clarifies that the definition in point 2.1.3.is related to both quick frozen products.

5. Contaminants

Editorial remark: Footnote 4 to be deleted in the text.

8. Sampling, examination and analysis

The EUMS fully support the text under Section **8.7 'Determination of added water'** and propose to remove the square brackets.

ƒ« In order to check the conformity with subsections 3.1, 3.2 and 3.3, a country may establish a scientifically supported criterion. Where a country has relevant scientific information on the characteristics of the scallop species it exports, it may approach an importing country to discuss the implementation of this criterion on a species by species basis. »ƒ

9. Definition of defectives

9.4 Parasites

The EUMS are of the opinion that the mention « objectionable level » should be subject to interpretation.

Being aware that zero parasite is not practicable, we would suggest modifying the sentence by **« Products covered by this Standard shall not contain readily visible living parasites. »**

If the parasites are **readily** visible, the product should not be placed on the market, especially if it is fresh product to be eaten raw (possibly).

9.6 Exceeding level of added water

The EUMS fully support the sub section '9.6 Exceeding level of added water' and propose to remove the square brackets. To be kept in accordance with 7.3.

Moreover, it is well indicated in 2.2.2 and 2.2.3, that the amount of added water shall be controlled and accurately measured for labelling purposes.

FRANCE

France would like to propose some linguistic comments about the draft standard for raw, fresh and quick frozen scallop products:

Please find below correction proposals related to translation of several terms in order to put it in accordance with English version /

CHAMP D'APPLICATION

i) 'Chair de coquilles Saint-Jacques ou de pétoncles **frais ou surgelés**', c'est-à-dire la chair du muscle adducteur qui reste après séparation complète de la coquille [**et de tous les viscères y compris le corail**].

ii) 'Coquilles Saint-Jacques ou pétoncles avec corail **frais ou surgelés**', c'est-à-dire la chair du muscle adducteur avec le corail attaché qui restent après séparation complète de la coquille et ~~de tous les autres des~~ viscères.

iii) ~~'Chair de coquilles Saint-Jacques ou de pétoncles' ou 'Coquilles Saint-Jacques ou pétoncles avec corail' avec de l'eau ajoutée et/ou ajout d'une solution d'eau et de phosphates.~~

Chair de coquilles Saint-Jacques ou de pétoncles **surgelés** (avec ou sans corail) avec de l'eau ajoutée et/ou ajout d'une solution d'eau et de phosphates.

iv) Chair de Coquilles Saint-Jacques ou de pétoncles **fraîches** avec ou sans corail avec de l'eau ajoutée.

DESCRIPTION

2.1.2 Coquilles Saint Jacques ou pétoncles avec corail

*On prépare les 'coquilles Saint-Jacques ou pétoncles avec corail' **fraîches ou surgelées** en séparant complètement le muscle adducteur et le corail attaché de la coquille et en détachant complètement les viscères dans la mesure de ce qui est pratiquement faisable. Les coquilles Saint-Jacques ou pétoncles avec corail ne contiennent pas d'eau, de phosphates ou d'autres ingrédients ajoutés. Le muscle adducteur et le corail sont présentés entiers.*

- Reprendre les titres 2,2,2 en 2,1,3 et 2,2,3 en 2,1,4 à savoir

~~2.1.3 Chair surgelée de coquilles Saint Jacques ou de pétoncles ou Coquilles Saint Jacques ou pétoncles avec corail surgelés transformés avec de l'eau ajoutée et/ou avec une solution d'eau et de phosphates~~
 Chair surgelée de coquilles Saint-Jacques ou de pétoncles transformée avec de l'eau ajoutée et/ou avec une solution d'eau et de phosphates

et

~~2.1.4 Chair de Coquilles Saint Jacques ou de pétoncles, Coquilles Saint Jacques ou pétoncles avec corail avec de l'eau ajoutée~~ Chair fraîche de Coquilles Saint-Jacques ou de pétoncles transformée avec de l'eau ajoutée

- A modifier dans les paragraphes 2.2.1, 2.2.2 et 2.2.3 : Le produit frais devra être conservé à une température inférieure **ou égale** à 4°C.

NORWAY

Chapter 2

Comment: We would like to suggest that CCFFP make sure that the definitions are the same in the standard and in the code as this is not the case at the moment. Definitions are recently discussed during the work on the COP, and we suggest that we look at these when discussing this chapter.

Reason: For consistency.

2.2.2 Quick frozen Scallop Meat Processed with Added Water and/or solution of water and phosphates

Comment: There should be no doubt that products under this heading shall be frozen. To make this clear, we would like to suggest the following amendment:

After removal of the shell, viscera, and roe as applicable, under good hygiene practices, the product is rinsed and stored with a method that minimizes absorption of water to the extent that is technologically practicable. The fresh product shall be kept at or below 4°C. The product is subject to the addition of water and/or phosphate solution (e.g., soaked, sprayed). The amount of added solution shall be controlled and accurately measured for labelling purposes. ~~The product~~ **Product, intended to be frozen** shall be subjected to a freezing process carried out in appropriate equipment in such a way that the range of temperature of maximum crystallization is passed quickly, in accordance with the requirements of the Code of Practice for the Processing and Handling of Quick Frozen Foods (CAC/RCP 8-1976).

Reason: This makes it very clear that phosphates are only to be used in products that are to be frozen.

Chapter 4

The food additive provisions in chapter 4.2 where not endorsed by the CCFA with the following comment: *More information is needed from the CCFFP on this proposal and that the information should be presented in tabular form as demonstrated in Annex 1 of CX/FA 13/45/2, for consideration and endorsement and the CCFA should ask CCFFP for further information on this issue for reconsideration at the next session of CCFA.*

Comment: We support the comments from CCFA, and would like to provide the following proposal for CCFFP to consider:

4.2 Quick Frozen Scallop Products	INS	Max Level	Function
Phosphates		2200 mg/kg as phosphorus	humectant / sequestrant

The phosphates are defined at the additive group level, and thus apply to the total content of the additives participating in this group. Additives that make up this group are provided for reference only.

We would also like to point out that there seems to be an error in the reference in the last sentence: It should be 2.1.3 and not 2.1.2.

Chapter 5

Comment: We suggest that we either delete footnote 4 (empty now), as we believe that the intent of this footnote is covered by 5.2 i) or insert a text which explains the footnote.

Chapter 7

The food labelling provisions in chapter 7 were endorsed by the Committee on Labelling with the following comments: *The Committee noted that there could be some redundancy in section 7.3 as it required both the percentage of scallop meat and percentage of added water to appear on the label. The Committee noted further the suggestion to replace “and” with “and/or” but also noted the diversity of views on this question in the Committee and that it would be further addressed in the CCFFP. The Committee further noted a proposal to amend sections 7.1.1, 7.1.2 and 7.1.3 to make them clearer and avoid confusion (see CRD 23) and noted that as the standard was at step 6 this could be further discussed at the CCFFP.*

Comment: We agree that both the percentage of scallop meat and added water does not need to appear on the label at the same time. This might be misleading and confusing for the consumer. This can also be difficult to get right both in a technical and practical way.

We also agree that 7.1.1, 7.1.2 and 7.1.3 should be clearer to avoid confusion.

First of all we would like to support keeping “x” before “the name” (in 7.1.1 and 7.1.2) and therefore clarifying the use of the “X” at the beginning of section 7, or including this information as a footnote to every “X” used in these two paragraphs:

New para under 7. or footnote: In section 7.1.1 and 7.1.2 “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.

Furthermore we think that the document needs consistency in the use of the terms “scallops” or “scallop meat”. In 2.1.1 – product definition, the product is defined as “Scallop meat”, and in 7.1.1 Name of the food, the term “scallops” is used. We would like to suggest discussing whether we use the term “Scallops”, when we are describing “scallop meat” or whether we should use “scallop meat”. The standard is named “Standard for Raw, Fresh, and Quick Frozen Scallop Products” and describes products where the shell etc. of the Scallop has been removed, and the use of the term “Scallop” might imply that the shell is unprocessed, and therefore we would prefer the term “scallop meat”.

In regards section 7.1.1 and 7.1.2 we would like to suggest the following amendments:

7.1.1 Scallop Meat or Roe-on Scallops

“X scallops **scallop meat**” and “X roe-on scallop meat if it conforms to the product descriptions outlined in 2.1.1. **and 2.1.2 respectively.**”

Reason: For clarity

7.1.2 Scallop Meat, Roe-on Scallops, with added water

“ X scallops **meat** with added water’, ‘Preparation of X scallops **meat** with added water’, or a like name as allowed in the country of sale, which differentiates the product from “X scallop meat” **and “X roe on scallop meat”** and is not misleading to the consumer if it conforms with the product description outlined in 2.1.23.

Products described in paragraph 2.1.4 also need to be addressed. We will come back to this.

As regards labelling of the use of phosphates in quick frozen “products”, we consider that this is covered by the general reference to CODEX STAN 1 – 1985 (GSFL).

Chapter 8

8.1 Sampling

(Sampling of lots for examination of the product shall be in accordance with the General Guidelines on Sampling (CAC/GL 50-2004) **with an AQL of 6,5**. The sample unit is the primary container, or for individually quick frozen or bulk packaged products, is at least a 1 kg portion of the package.

UNITED STATES OF AMERICA**General comments:**

- The loop of intestine that passes through the gonad is not removed during processing, and causes a potential biotoxin hazard in scallop roe. This piece of intestine becomes toxic when filled with toxic algae, resulting in overall roe toxicity, although the surrounding gonadal tissue may be non-toxic. (Bourne 1965¹, Bogan et al. 2006²)
- The intestinal loop can also retain viral and bacterial pathogens from the harvest area.
- With regard to domoic acid reported in scallop adductor muscle, the literature indicates that this only occurs when the adductor muscle and roe are tested together, or the adductor muscle is tested in whole scallops after death or freezing, which allows toxin migration.
- The U.S. has never detected saxitoxin in commercially processed scallop adductor muscle meat, even when the viscera are highly toxic.
- Scallops to which only water has been added are considered adulterated by some countries (including the U.S.). Without the use of a moisture retention agent, any added water results in increased drip loss for the buyer, and, if cooked, the added water is lost, providing no legitimate benefit. We are opposed to including this questionable product traded by only a few countries.
- The products included in this Standard are confusing, even for our committee, so every effort should be made to clearly differentiate and consistently name each product.
- Appendix 1 contains the Draft Scallop Standard with the U.S. proposed changes.

TITLE, Revise as follows:

DRAFT STANDARD FOR ~~RAW~~, FRESH AND QUICK FROZEN, **RAW** SCALLOP PRODUCTS

Reason: For clarity because it may be misunderstood that quick frozen scallops may be cooked.

1. SCOPE, This standard applies to bivalve species of the *Pectinidae* family in the following product categories: Revise numbered items as follows:

i) Fresh or quick frozen ‘Scallop Meat’, which is the scallop adductor muscle meat, ~~remaining after the shell and all viscera (including roe) have been completely removed.~~

Reason: To simplify. No need to include what is removed. This is covered in the product definition (2.1) and Code of Practice.

ii) Fresh or quick frozen ‘Roe-On Scallops’, which is the scallop adductor muscle meat and ~~the attached roe, remaining after the shell and all other viscera have been completely removed.~~

Reason: To simplify. No need to include what is removed. This is covered in the product definition (2.1) and Code of Practice.

iii) Quick frozen ‘Scallop Meat’, or ‘Roe-on Scallops’, with added ~~water and/or~~ solutions of water and phosphates.

Reason: Added-water-only products are covered separately under item ‘iv’ of this section.

[iv] Fresh **“Scallop Meat”** ~~with or without roe~~ **and “Roe-on Scallops”** with added water]

Reason:

- *Clarity.* To use terminology consistent with ‘i’ and ‘ii’ above that clearly differentiates these products.
- *Placed in brackets because water-added-only products have questionable justification for inclusion in the Standard:*

¹ Bourne N. Paralytic shellfish poison in sea scallops (*Placopecten Magellanicus* Gmelin). J. Fish. Res. Bd. Canada, 22(5):1137-1149, 1965

² Bogan YM, Kennedy D, Harkin AL et al. Comparison of domoic acid concentration in king scallops, *Pecten maximus* from seabed and suspended culture systems. J. Shellfish Res. 25(1):129-135. 2006

- *These products are considered adulterated in some countries, including the United States.*
- *Without a water retention agent, the added water will increase drip loss.*
- *Raw consumption cannot be assumed, and if cooked all the added water will be lost, thus providing no benefit to the end consumer.*
- *More information is needed on the extent of trade in these products outside the EU.*

1. SCOPE, This standard does not apply to: Revise item “ii” as follows:

ii) Whole scallops (live, fresh or frozen in which the shell and all viscera are attached-) **and half-shell scallop products (fresh or frozen in which one half of the shell is left attached as part of the presentation).** These products are included in the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008).

Reason: To avoid any confusion about half-shell products.

2. DESCRIPTION

2.1 Product definition

2.1.2 Roe-on Scallops: Edit first sentence as follows:

Fresh or quick frozen “~~R~~roe-on ~~S~~callops” are prepared by completely removing the adductor muscle and attached roe from the shell and detaching all other viscera to the extent practical. **The roe should remain attached to the adductor muscle.**

Reason: Editorial. Remove quotation marks and capitals for consistency with 2.1.1. To clarify that the roe remain attached to the meat.

2.1.3 Quick Frozen Scallop Meat or Roe-on Scallops Processed with Added Water and with solution of water and phosphates: Delete footnote #1, and revise heading and text as follows:

2.1.3 Quick Frozen Scallop Meat, or Roe-on Scallops, Processed with Added Water and with Solution of Water and Phosphates

Quick frozen “scallop meat”, or “~~R~~roe-on scallops”, with added solutions of water and ~~or~~ phosphates contain the products defined in 2.1.1- and 2.1.2, and a solution of water and ~~or~~ phosphates and optionally salt. **These products are frozen.**

Reason:

- *Proposed added-water-only products cannot be frozen and are covered separately under 2.1.4 below.*
- *To clarify that these products are frozen, not fresh.*
- *The term “added solution” is more accurate than “added water” and consistent with the text.*
- *The word “processed” provides no useful information because all these products are processed.*
- *Footnote #1 is no longer applicable.*

2.1.4 Fresh Scallop meat, Roe-on Scallops with added water - Revise heading and text and place in brackets as follows:

[2.1.4 Fresh Scallop Meat, or Roe-on Scallops, with Added Water

Fresh scallop meat, or roe-on scallops, with added water contain the products defined in 2.1.1, ~~or~~ 2.1.2, and added water. **These products are not frozen]**

Reason:

- *Editorial, and for clarity of product names.*
- *To prevent confusion about freezing because the products referred to “in 2.1.1 or 2.1.2” are allowed to be frozen.*

- *Placed in brackets because we question the inclusion of water-added-only products in this Standard (see comment for the Scope section):*

2.2 Process definition:

2.2.1 Scallop Meat and roe-on scallops - Revise heading as follows:

2.2.1 Scallop Meat and ~~Ơ~~Roe-on ~~s~~Scallops

Reason: Editorial, for consistent capitalization.

2.2.2 Quick Frozen Scallop Meat Processed with Added Water and/or solution of water and Phosphates - Revise heading and first paragraph as follows:

2.2.2 Quick Frozen Scallop Meat, or Roe-on Scallops, ~~Ơ~~Processed with Added Water ~~and/or~~ ~~s~~Solution of wWater and ~~p~~Phosphates

After removal of the shell, viscera, and roe as applicable, under good hygiene practices, the product is rinsed and stored with a method that minimizes absorption of water to the extent that is technologically practicable. The fresh product shall be kept at or below 4°C. The product is subject to the addition of ~~water and/or~~ phosphate solution (e.g., soaked, sprayed). The amount of added solution shall be controlled and accurately measured for labelling purposes. ~~The P~~product, ~~intended to be frozen shall be~~ is subjected to a freezing process carried out in appropriate equipment in such a way that the range of temperature of maximum crystallization is passed quickly, in accordance with the requirements of the *Code of Practice for the Processing and Handling of Quick Frozen Foods* (CAC/RCP 8-1976).

Reason:

- *To align with the product definitions*
- *Proposed added-water-only products should not be included here because they must be fresh and are covered separately under 2.2.3 below*
- *Phosphate treated products must be frozen, so should not state “intended to be frozen.”*

2.2.3 Fresh Scallop Meat Processed with Added Water – Revise heading and place in brackets:

[2.2.3 Fresh Scallop Meat, or Roe-on Scallops, ~~Ơ~~Processed with Added Water]

Reason:

- *To align with the product definitions in section 2.1*
- *The word “processed” provides no useful information because all these products are processed.*
- *Placed in brackets because we question the inclusion of a water-added-only product in the Standard (see comments for Scope section)*

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Scallop Meat and Roe-on Scallops – Move the glazing provision from 3.3 to here, as follows:

The product shall be prepared from sound and wholesome scallops which are of a quality suitable to be sold fresh for direct human consumption.

If glazed, water used for glazing or for preparing glazing solutions shall be potable water² or clean water³.

Reason: To move the glazing provision to the applicable products, consistent with other provisions organized by product. This eliminates the need for a dangling glazing section.

3.2.1 Quick Frozen Scallop meat, or roe-on scallops with added water and/or with solution of water and phosphates – Revise section number, heading and text as follows:

~~3.2.1~~ 3.2 Quick Frozen Scallop ~~m~~Meat, ~~Ơ~~Roe-on ~~s~~Scallops, with ~~a~~Added water ~~and/or~~ with ~~s~~Solution of wWater and ~~p~~Phosphates

The product shall be prepared from sound and wholesome scallops which are of a quality suitable to be sold quick frozen for direct human consumption.

Added ~~water and/or~~ solution of water and phosphates and salt are permitted to the extent that the ~~water~~ **solution** uptake is accurately measured and labelled and ~~their~~ **its** use is acceptable in accordance with the law or custom of the country in which the product is sold. Water shall be of potable quality², phosphates shall be food grade, and salt shall comply with the *Standard for Food Grade Salt* (CODEX STAN 150-1985).

Water used for glazing or for preparing glazing solutions shall be potable water² or clean water³.

Reason:

- *Editorial, and to align with the product definitions*
- *To remove proposed added-water-only products because they are not frozen and are covered separately under 3.2.2 below*
- *To move the glazing provision to the applicable products, consistent with other provisions organized by product.*
- *To change the section number to 3.2 to be consistent with previous section 3.1*

3.2.2 Fresh scallop meat, or roe-on scallops, with added water – Place section in brackets and revise heading and text as follows:

[~~3.2.2~~ 3.3 Fresh sScallop mMeat, or rRoe-on sScallops, with aAdded wWater]

The product shall be prepared from sound and wholesome scallops which are of a quality suitable to be sold fresh for direct human consumption.

Added water and/or salt are permitted to the extent that the added water uptake is accurately measured and labelled and ~~their~~ **its** use is acceptable in accordance with the law or custom of the country in which the product is sold. Water shall be of potable quality² and salt shall comply with the *Standard for Food Grade Salt* (CODEX STAN 150-1985).]

Reason:

- *Editorial, and to align with the product definitions*
- *To change the section number to 3.3 to be consistent with section 3.1*
- *Placed in brackets because we question the inclusion of a water-added-only product in the Standard (see comments for Scope section)*

3.3 Glazing – Remove section

Reason: Text moved to revised sections 3.1 and 3.2, per previous comments.

3.4 Final Product – Revise as follows:

3.4 Final Product

Products shall meet the **defectives** requirements of this Standard when lots examined in accordance with section 10 comply with the provisions set out in section 9 (**Definition of Defectives**). Products shall be examined by the methods given in section 8.

Reason: Products do not meet the requirements of this Standard simply by complying with the provisions set out in Section 9 (Definition of Defectives); products must meet all the provisions of the Standard.

4. FOOD ADDITIVES

4.1 Fresh Scallop Meat and Roe-on Scallops with or without added water – Revise heading and text as follows:

4.1 Fresh Scallop Meat and Roe-on Scallops; and Fresh Scallop Meat and Roe-on Scallops with or without Added Water

No food additives are permitted in ~~this~~ **these** products (defined in Sections 2.1.1, 2.1.2, and 2.1.4.)

Reason: To clearly differentiate and describe the products in order to reduce confusion associated with this Standard.

4.2 Quick Frozen Scallop Meat and Roe-on Scallops Processed With Phosphates – Revise the heading and text as follows:

4.2 Quick Frozen Scallop Meat, and or Roe-on Scallops, Processed With Added Solution of Water and Phosphates

The phosphates listed below are allowed for use as humectants or sequestrants in only the products defined in ~~2.1.2~~ **2.1.3** (Quick Frozen Scallop Meat, or Roe-on Scallops with Added Solution of Water and Phosphates).

Additives must be applied in conformance with section 3 of the *General Standard for Food Additives* (CODEX STAN 192-1995) and with good manufacturing practices as provided in section “X” of the Code of Practice for Processing of Quick Frozen Scallop Meat⁴.

“Phosphates” allowed for food category 09.2.1 (Frozen fish, fish fillets, and fish products, including molluscs, crustaceans, and echinoderms) of the *General Standard for Food Additives* (CODEX STAN 192-1995) are also allowed in the products defined in subsection ~~2.1.2~~ 2.1.3 of this Standard at a maximum level of 2200 mg/kg expressed in P₂O₅ (including phosphates naturally present in the shellfish).

Reason: Consistency.

5. CONTAMINANTS

5.2 - Remove reference to footnote #5 because the footnote text is now included in section 5.2 (i).

6. HYGIENE AND HANDLING – Add new subsection 6.3 as follows:

6.3 Roe-on scallop products 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 (CODEX STAN 292-2008) and as sampled and analyzed in accordance with the same Standard.

Reason:

- This provision reflects the previous CCFPP decision that the hazard characteristics of roe-on scallops align more closely with whole bivalve molluscs than with scallop meat.
- CCFPP agreed to include this provision, as presented by Canada, during the discussion of the Hygiene Section and during the review of the Draft Session Report.
- The gonad contains a loop of the intestine that will retain the pathogens from the harvest area that are a concern in whole bivalve molluscs harvested from unapproved areas.

7.0 LABELLING

7.1 Name of the Food – Delete the following:

The name of the product shall be:

Reason: This wording is incorporated better into the proposed text in the subsections below.

7.1.1 Scallop Meat or Roe-on Scallops – Delete the following:

“X scallops” if it conforms with the product description outlined in 2.1.1 or

And replace with the following:

The names for scallop meat (as defined in 2.1.1) and roe-on scallops (as defined in 2.1.2) shall be “Scallop Meat” and “Roe-on Scallops” respectively, or like names allowed in the country of sale that do not mislead or confuse the consumer.

Reason:

- *The name for roe-on scallops should not be “X scallops”. Roe-on scallops should include the term “Roe-on” (or similar) in the name.*
- *Too restrictive. For example, the common name “scallops” should be allowed.*
- *The term “X” implies that the common name is required; however the provision for a common is covered in subsection 7.1.3, and does not need to be represented by an “X” in this section.*
- *Section 2.1.1 only applies to scallop meat, and not to roe-on scallops (roe-on is covered in section 2.1.2).*

7.1.2 Scallop Meat, or roe-on scallops, with Added Water – Revise title and first paragraph as follows:**7.1.2 Scallop Meat, or Roe-on Scallops, with Added Solution of Water and Phosphates**

~~“X scallops with added water”, ‘Preparation of X scallops with added water’,~~ **The name for scallop meat, or roe-on scallops, with added solution of water and phosphates (as defined in 2.1.3) shall be “Scallop Meat, or Roe-on Scallops, with X Percent Added Solution of Water and Phosphates” or a like name as allowed in the country of sale, which differentiates the product from scallop meat, or roe-on scallops, and is not misleading to the consumer, if it conforms with the product description outlined in 2.1.2.**

The percentage added solution (“X Percent”) is calculated from the product net weight before and after treatment, and prior to freezing.

Reason:

- *The proposed provision for listing the percentage added solution in the name may be modified “as allowed in the country of sale”. This allows countries to require both the percentage scallop meat and the percentage added solution, if desired.*
- *To appropriately cover “Scallops with an Added Solution of Water and Phosphates” described in Section 2.1.3, rather than the separate product “Scallops Meat, or Roe-on Scallops, with Added Water” described in Section 2.1.4 that should be in a separate section for consistency and to prevent confusion.*
- *The section references are incorrect. Section 2.1.2 refers to roe-on scallops, Section 2.1.3 refers to frozen products with added phosphate solutions and Section 2.1.4 refers to fresh products with added water.*
- *To define “X Percent”.*
- *See comments for Section 7.1.1 regarding “X Scallops”.*

7.1.2 Scallop Meat, or roe-on scallops, with Added Water – Delete the following

~~“X” in 7.1.1 and 7.1.2 being 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: *This paragraph is not needed because the provisions in Section 7.1.3 cover the listing of the common or species name on the label (See comment for 7.1.1 above).*

Add new Section 7.1.3 (previous 7.1.3 is moved to 7.2 below) as follows:

7.1.3 Fresh Scallop Meat, or Roe-on Scallops, with Added Water

The name for fresh scallop meat, or roe-on scallops, with added water (as defined in 2.1.4) shall be “Scallop Meat, or Roe-on Scallops, with X Percent Added Water” or a like name as allowed in the country of sale, which differentiates the product from scallop meat, or roe-on scallops, and is not misleading to the consumer.

The percentage added water (“X Percent”) is calculated from the product net weight before and after treatment.

Reason:

- To provide a name for the water-added-only product in alignment with the phosphate treated product in section 7.1.2 above.
- Placed in brackets because we question if this product should be included in the Standard (see comment for Scope section)

7.1.3 – Change section number to 7.2 (renumber the other sections accordingly), and modify the text as follows:

7.2 In addition to the name identified in 7.1.1 and 7.1.2 **7.1**, the product shall **may** be identified by a common and/or scientific **species** names ~~as determined by the competent authority~~ **that is allowed in the country of sale and does not mislead or confuse the consumer**. The country where the product is sold can determine if the scientific name **or common name** must be indicated on the label.

Reason:

- The first and second sentences are redundant and inaccurate. The intention of the first sentence is to allow the option to include the common or scientific species name with the product name. The second sentence provides that the competent authority in the country of sale may require the labeling the scientific species name or common name.
- To improve section numbering

7.3 – Remove section and footnote:

~~**7.3** Water added as an ingredient to scallop products shall be declared in the list of ingredient⁶ and the percentages of scallop meat and percentage of added water shall clearly appear on the label.~~

~~⁶ As prescribed in section 4.2.1.5 and 5.1.2 in the *General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985)~~

Reason:

- This requirement is allowed by an importing country (see section 7.1).
- This is not a comminuted product where the scallop meat is not recognizable; therefore, labeling the percentage scallop meat is unnecessary.
- The CCFL “noted that there could be some redundancy in section 7.3 as it required both the percentage of scallop meat **and** percentage of added water to appear on the label.” (REP13/FL)
- This provision would require special labels for exported scallop products that would be an unnecessary burden for U.S. industry.
- The *General Standard for the Labelling of Prepackaged Foods*, sec. 5.1.1 (d) provides that the commodity standard takes precedence for specific labeling provisions.
- The Codex Stan 1-1985 sections cited in the footnote are unnecessary for this product (see second bullet above), and should be replaced by specific provisions in this Standard.

8. SAMPLING, EXAMINATION AND ANALYSIS

[8.7 Determination of added water]

General comment: The U.S. has investigated the use of moisture content limits for scallops, and they are not a practical regulatory control for added water because of natural moisture variance, particularly in scallops located in low salinity areas. In addition, these type regulatory limits lend themselves to abuse because processors then add water to meet the moisture limit, which by necessity is significantly higher than the average natural moisture content. However, moisture or moisture/protein limits may be useful to detect gross abuse in certain species, and countries are free to use a limit if it remains scientifically valid.

9. DEFINITION OF DEFECTIVES

9.4 Parasites: Remove brackets:

{The presence of readily visible parasites at an objectionable level}

Reason: Parasites are not a food safety hazard in scallops, but can cause the product to have an objectionable appearance. An “objectionable level” is subjective; however quantitative criteria are not practical because of the variability in parasite shape, size, color, and location.

[9.6 Exceeding level of added water - Level of added water exceeding that declared in the label.] – Remove section.

Reason:

- CCFFP has not agreed on moisture/protein limits, or on what method to use.
- This would be a stand-alone criterion, and should not be added into the defect count.

Add new Section 9.7 Viscera as follows:

9.7 Viscera

The presence of viscera workmanship defects affecting more than 10% of the sample by weight, where it has been demonstrated that the toxicity associated with the viscera satisfies the biotoxin requirements of subsection 5.2 of this Standard.

(i) If it has not been demonstrated that the biotoxin requirements of subsection 5.2 of this Standard are satisfied for the viscera, then there is no tolerance for viscera workmanship defects.

(ii) Traces of membrane or stain due to viscera or roe are not considered a workmanship defect.

Reason: To provide a needed provision for workmanship defects (safety and quality).