



Agenda Item 7

CX/FFP 14/33/9-Add.3

ORIGINAL LANGUAGE ONLY

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

Thirty-third Session

Bergen, Norway

17 – 21 February 2014

**PROPOSED DRAFT CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS (SECTION ON
STURGEON CAVIAR)**

(At Step 3 of the Procedure)

Comments submitted by Brazil, Costa Rica and European Union

BRAZIL

Suggestion: Definitions. Brazil suggests adding at the end of sentence:

“ Extra pure food grade salt: Food grade salt which contain at least 99,9% sodium chloride in dry weight, exclusive of additives ”

Rationale: The sentence will be in accordance to Paragraph 3.1 from Codex Standard for Food Grade Salt - Codex Stan 150-1985.

Suggestion: Definitions. Brazil suggests a new sentence:

“Pasteurization is a microbiocidal heat treatment aimed at to reducing the number of any pathogenic micro-organisms in sturgeon caviar, if present, a level at which they do not constitute a significant health hazard.”

Rationale: The sentence will be in accordance to Pasteurization definition (adapted) in Code of Hygienic Practice for Milk and Milk Products – CAC/RCP 57-2004.

Suggestion: X.1 Fish reception. Potential defects: Discoloration. Brazil suggests linking this potential defect with an item on Technical guidance.

Rationale: It is not clear which procedure on Technical guidance will avoid discoloration.

Suggestion: X.2 Fish storage. Potential defects: Off flavour and off-odour. Brazil suggests linking this potential defect with an item on Technical guidance.

Rationale: It is not clear which procedure on Technical guidance will avoid off flavour and off-odour.

Suggestion: X.4 Belly cutting and ovary removal. Potential defects: tough fish body fragments. Brazil suggests to link this potential defect with an item on Technical guidance.

Rationale: It is not clear which procedure on Technical guidance will avoid off flavour and off-odour.

Suggestion: X.5 Ovary cutting to small pieces and sleving. Brazil suggests including a new potential defect:

*“Potential defects: Physical damage to the eggs, off flavour and off odour, **eggs with bad consistency.**”*

Rationale: The first point of Technical guidance indicates the use of cool potable water to improve consistency of the eggs.

Suggestion: X.8 Micro caesarean, roe vaccuning or hand stripping. Brazil suggests including a new potential defect:

*“Potential defects: Physical damage to the eggs, foreign matter, **off flavour and off odour.**”*

Rationale: Consistency to the second bullet point of the Technical guidance.

Suggestion: X.10 Washing and draining the eggs. Brazil suggests the inclusion of two new potential defects:

*“Potential defects: Quality loss (damage to the texture, off flavours and odours), **foreign matter, excess of water remaining in fish eggs.**”*

Rationale: Consistency to the second and third bullet points of the Technical guidance.

Suggestion: X.18 Caviar packing (vacuum sealing and primary coding). Brazil suggests including a new potential defect:

*“Potential defects: Oxidation, mould and yeast growth, physical damage, off flavour and discoloration due to corrosion of epoxy coatings, improper coding, **cans/jars did not fill with enough eggs.**”*

Rationale: Consistency to the second bullet point of the Technical guidance.

Suggestion: X.21 Refrigeration. Brazil suggests deleting the first potential hazard:

“Potential hazards: ~~Microbiological contamination~~, pathogenic microbial growth.”

Rationale: The product could not be contaminated since it is already packed.

COSTA RICA

Costa Rica agradece la oportunidad de poder expresar los comentarios al documento **CX/FFP 14/33/9**, sin embargo, por ser un producto que no es un hábito de alimentación en la cultura Costarricense, no se hacen comentarios al mismo.

EU

GENERAL COMMENTS:

The EUMS consider it essential to align the provisions of the Code of Practice with all relevant Codex texts, and in particular with the Standard for Sturgeon Caviar (CODEX STAN 291 – 2010). Therefore, discussions on definition for caviar should not be re-opened as they already exist in the Standard for Sturgeon Caviar (CODEX STAN 291-2010). Consistency with the Standard in relation to the use of hormones should also be ensured.

DEFINITIONS:

As mentioned in the general comments, the EUMS consider that it is not necessary to include any definition on caviar or fish eggs in the Code of Practice since these definitions are already included in section 2.1 of the Standard (291-2010).

Extra pure food grade salt

The proposed definition is not in line with the Standard for Sturgeon Caviar (CODEX STAN 291-2010), where section **3.2 Salt** reads:

*“Salt shall be of food grade quality and conform to all applicable Codex Standards”. The Standard for Food Grade Salt (CODEX STAN 150-1985) in **section 3.1** Minimum NaCl content reads: “The content of NaCl shall not be less than 97% on a dry matter basis, exclusive of additives”.*

Therefore, the EUMS propose deletion of the definition of “*Extra pure food grade salt*”.

As a consequence section X.11 Ingredients reception would need to be amended.

GENERAL CONSIDERATIONS:

2nd Paragraph:

For the sake of clarity and in order to align the text with the provisions of the existing Standard for caviar, the EUMS propose to replace the second paragraph with the following text:

~~*This section applies to caviar production from sturgeon fish both by slaughtering [and by extracting the eggs after ovulation (without slaughtering the sturgeons; allowing multiple harvests). Ovulation can be induced by releasing factors (synthetic or natural), naturally by homogenates/lysates of carp or sturgeon pituitary gland containing these factors and/or environmental means to trigger natural hormone release from the fish brain under appropriate conditions (light/temperature).]*~~

~~*“This section applies to sturgeon caviar production, both by slaughtering of the sturgeon and also by induction of ovulation by natural means as well as by the use of authorized products”*~~

3rd paragraph

The EUMS would also like to propose **deletion of third paragraph** of the general considerations.

~~*“Caviar is produced traditionally using basic practices which have never been mechanized due to the sensitivity of the product and the depletion of wild sturgeon stocks. The use of advanced complex machinery has been less popular for caviar production due to the simplicity of caviar production.”*~~

4th paragraph

The EUMS would suggest to clarify the **4th paragraph** since it is indicating that “*there is also no step which eliminates microorganisms (e.g. thermal processing)[...]*” but there is a special point relating to pasteurisation in X.19. Thus, the use of pasteurisation should be clarified further (by indicating that it is not often used since it is likely to change taste and flavour but still, remains an option).

Chemical hazards:

The EUMS propose to eliminate “...*case of farmed fish*”. The amended text would read as follows:

“Contaminants such as heavy metals, pesticides, oil derivatives, residues of veterinary drugs *in the case of farmed fish* need to be considered....”

X.1 Fish reception

4th bullet point should be deleted as dead fish should not be used.

~~*‘In case of fresh (non-live) fish, sensory evaluation charts and tables should be accessible at fish reception sites according to section 8.1.1.1 (Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003)) and the person who receives the fish should assess the fish accordingly and dispose of the unacceptable fish.’*~~

X.2 Fish storage

The 3rd bullet point of this section should be placed under section X.3 Slaughter. The EUMS would also like to propose an amendment to the text of this bullet point as there are different methods for stunning, not only the use of voltage. The final text would read as:

Stunning may be used to reduce stress after fish are harvested. It should be done by a skilled person *using appropriate voltage that would in order* not *to* damage the fish or eggs

X.6 Laying induction

The EUMS suggest deleting the square brackets and keeping the text as drafted.

X 7 Anaesthesia for big fish

The EUMS propose to remove the brackets and to maintain the section as drafted.

X.8 Micro caesarean, roe vacuuming or hand stripping - Potential hazards

The wording “*roe vacuuming*” (used as synonym for hand stripping) should be eliminated as it could give the wrong impression of a mechanical suction of the roe.

~~*“Micro caesarean, roe vacuuming or hand stripping - Potential hazards”*~~

X.9: Treatment of eggs with shell improving methods

The EUMS support deletion of the square brackets and to maintain the section as drafted.

X.11 Ingredients reception

Technical guidance, fourth bullet

“Salt that is used for caviar processing should be extra pure food grade salt (99,9 % pure sodium chloride) with minimum impurities such as magnesium and calcium. These elements affect the taste of the caviar and the penetration of sodium chloride into the eggs.” is not in line with the Standard for Sturgeon Caviar (CODEX STAN 291 – 2010), and the Standard for Food Grade Salt (Codex Stan 150 – 1985).

The EUMS are not aware of any food safety issue related to impurities in caviar and we consider that this Code of practice is not the right document to consider this issue, in particular taking into account that the Standard for Food Grade Salt was recently updated.

Therefore, the EUMS propose the following amendment:

- “Salt ~~that is~~ used for caviar processing should be ~~extra pure~~ food grade salt (~~99,9% pure sodium chloride~~) with ~~minimum impurities such as magnesium and calcium~~. ~~These elements affect the taste of the caviar and the penetration of sodium chloride into the eggs.~~”

X.20 Weighting and labelling

The EUMS consider that the country of origin should be included in the labelling since it is important information for the consumer and its omission could mislead or deceive the consumer. The text proposed would read as follows:

“Technical guidance:

- *Information printed on the labels should be in compliance with General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985) and The Standard for Sturgeon Caviar (CODEX STAN 291-2010). **The country of origin shall be labelled.**”*

X.23 Repacking

Editorial comment: *See section X.19-18.*