

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

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Agenda Item 6

CX/FFP 00/6

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Twenty-fourth Session
Ålesund, Norway, 5-9 June 2000

DRAFT STANDARD FOR CRACKERS FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND MOLLUSCAN SHELLFISH GOVERNMENT COMMENTS AT STEP 6 (Malaysia, Poland)

MALAYSIA

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.4 FINAL PRODUCT

3.4.2 The product shall comply with the requirements prescribed in Table 1.

Malaysia is of the view that fish crackers in this Draft Standard shall specifically address the connotation of a snack with high protein content. This is to maintain an appropriate level of fish protein for nutrition and, therefore, safeguard consumer interest.

Therefore, Malaysia would like to propose that the Committee consider a minimum requirement of 12% (w/w) crude protein in fish crackers and a minimum requirement of 7% (w/w) crude protein in crustacean or molluscan shellfish. This requirement was presented at the 10th Session of the Codex Coordinating Committee for Asia in 1996 (PART C: REVISED PROPOSED DRAFT STANDARD FOR CRACKER FROM MARINE AND FRESHWATER FISH, CRUSTACEAN AND MOLLUSCAN SHELLFISH, CX/Asia 96/4 (a-c) Dec 1995).

In view of this, Malaysia would also like grades to be excluded since only one level of protein in any one type of cracker is necessary for consumer protection. Therefore, Malaysia proposes that section 7.3 be deleted, and Table 1 of Section 3.4.2 to read as follows:

Table 1: Requirements for Crackers from Marine and Freshwater Fish, Crustacean and Molluscan Shellfish

Characteristics	Fish	Crustacean or Molluscan Shellfish
Crude protein (N X 6.25), Percent w/w min.	12	7
Moisture content, Percent w/w	8 to 14	8 to 14

2. DESCRIPTION

2.1 PRODUCT DEFINITION

Malaysia would like to clarify that the Draft Standard is for single ingredient crackers and not crackers made of a mixture of fish and shellfish. Therefore, Malaysia proposes to amend the product definition to read as follows:

“The product is a traditional snack food made from fresh fish or frozen minced flesh of either marine (including both the red meat and white meat species) and/or freshwater fish, or crustacean (including prawns and shrimps) or molluscan shellfish (including squids, cuttlefish, oysters, clams, mussels and cockles) as described in section 3.1 and other ingredients as described in section 3.2.”

4. FOOD ADDITIVES

Additives

- i. Malaysia would like to propose that “Polyphosphates” be categorized as a “Sequestrant” instead of a “Food conditioner” as the technological function of the latter was not covered under the phosphate group. This amendment was discussed and proposed at the 29th Session of the Codex Committee on Food Additives and Contaminants, 1997 (para. 14, ALINORM 97/12A)

Malaysia would also like to propose the maximum level of polyphosphate in the final product to be replaced by “5g/kg expressed as P₂O₅, singly or in combination” instead of “Limited by GMP”.

This is because Section 2.2 states that product prepared from frozen minced flesh may contain phosphate which acts as a water retention agent for frozen minced flesh. Therefore, Malaysia would like to propose the limit as 0.5% as stated in CX/ASIA 96/4 (a-c), December 1995, but expressed in the units g/kg. The unit expressed is in line with other Codex standards, i.e. CODEX STAN 166-1989, Codex Standard for Quick Frozen Fish Sticks (Fish Fingers) Fish Portions and Fish Fillets – Breaded or in Batter.

- ii. Malaysia would also like to retain the maximum level in the final product for Monosodium Glutamate as “Limited by GMP”. This is because glutamic acid is naturally present in fresh fish, crustacean and molluscan shellfish and its level varies among species. Therefore, it is not practical to limit the level of Monosodium Glutamate (MSG). Furthermore, MSG has an ADI not specified and is listed in Table 3 of the Codex General Standard for Food Additives (Additives Permitted For Use In Food In General, Unless Otherwise Specified, In Accordance With GMP) to be adopted at the 23rd. Session of the Codex Alimentarius Commission in June 1999.

6. PACKING

In response to the question by the Delegation of Thailand on the need for transparent packaging material, Malaysia is of the view that the use of transparent packaging material would enable consumers to view the product quality at the time of purchase. In view of the effect of transparent packaging material on the product quality as a result of lipid oxidation reactions being initiated by light, Malaysia proposes Section 6.1 to be amended as follows:

“6.1 *The product shall be packed in a suitable packaging material which is moisture proof, gas impermeable and light impermeable. The package shall have an appropriately sized transparent window at the back of the package.*”

The inclusion of a transparent window will enable consumers to view the product quality (breakage, colour, and any other visible quality attributes) at the time of purchase. When the packages are stacked on the shelves for sale, the transparent window will be at the back of the package, and therefore, the product will not be exposed to light.

7. LABELLING

Malaysia proposes that the preamble of this section be amended to replace “CODEX STAN 1-1985” with “CODEX STAN 1-1985 (Rev. 1-1991)”.

POLAND

We propose to set up limits for heavy metals especially which are harmful to health.
We do not agree to add polyphosphate to fish products.