

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5

CX/FFP 02/5-Add.2

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Twenty-fifth Session
Ålesund, Norway, 3 - 7 June 2002

CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS: DRAFT SECTIONS (1, 2.1, 2.2, 2.9, 3 TO 6 AND 13) PART I - DRAFT SECTIONS AT STEP 6

COMMENTS SUBMITTED TO THE EXECUTIVE COMMITTEE AND TO THE COMMITTEE ON FOOD HYGIENE

1. EXECUTIVE COMMITTEE

MALAYSIA

Introduction

Malaysia is of the view that the optional use of DAP Analysis, as stated in the second paragraph of Section 5, should be emphasized in the Introduction. Therefore, Malaysia would like to propose the inclusion of the following text, as the last sentence in the third paragraph of the Introduction:

“However, Defect Action Point Analysis is optional.”

SECTION 2 DEFINITIONS

2.1 General Definitions

Malaysia would like the term **Food Suitability** be defined in line with the Recommended International Code of Practice, General Principles of Food Hygiene, CAC/RCP 1-1969, Rev.3 (1997). Therefore, the term food suitability should read as follows:

Food suitability: assurance that food is acceptable for human consumption according to its intended use.

2. COMMITTEE ON FOOD HYGIENE

In response to the CL 2001/15 - FH , comments were received from Canada, Finland, New Zealand, South Africa and the United States of America

General comments

CANADA

Canada is an active member of the Codex Committee on Fish and Fishery Products and of the Drafting Group working on the Proposed Draft Code of Practice for Fish and Fishery Products. Canada is pleased to advise that it endorses the hygiene provisions found in this Proposed Draft Code of Practice.

FINLAND

Finland would like to thank the drafting partners of good work. Finland considers the proposed document to be useful and recommends it to be forwarded. However, we have some detailed comments on the text.

SOUTH AFRICA

South Africa supports the endorsement of the texts, subject to the following amendments.

NEW ZEALAND

New Zealand supports the recommendation that the texts are “suitable for endorsement with amendments” and has the following comments on specific sections.

UNITED STATES OF AMERICA

The United States fundamentally endorses the sections of the Fish and Fisheries Products Code of Practice that are at Step 5. The structure reflects over five years of effort by the Codex Committee on Fish and Fisheries Products (CCFFP) to integrate Hazard Analysis Critical Control Point (HACCP) principles into the Code. The United States notes that, to that end, the CCFFP has had to deal with three overarching issues: (1) ensuring that the hazards addressed in the Code were scientifically appropriate and that the controls described for those hazards were also appropriate and feasible; (2) ensuring that the member nations of the CCFFP could achieve a consensus in support of the Code as upgraded by taking into account the needs and legitimate practices of the member nations; and (3) ensuring that the Code is formatted in a manner that the member nations find the useful and understandable. The United States believes that the sections of the Code at step 5 fundamentally achieve those objectives.

The United States notes that one key issue in the development of a consensus was how to address non-safety hazards. Some nations’ regulatory schemes involve the application of HACCP principles for safety only, while other nations apply HACCP principles to quality in addition to safety. Because it is possible to apply the activities contained in the HACCP principles to both safety and quality, this code of practice has been drafted to demonstrate how to do so, but is careful to distinguish between the two. The Code places appropriate emphasis on safety, emphasizing that HACCP is a system to ensure the safety of food. The Code refers to the application of the activities contained in the HACCP principles to quality as “a similar approach” to HACCP called “Defect Action Point Analysis” (introduction to section 4). The Code further emphasizes this distinction by advising that “each facility should implement a food safety management system based on HACCP principles and should at least consider a similar approach to defects” (section 4.3). The United States believes that this explanation -- that food processors should use HACCP for safety but need only consider the use Defect Action Points (DAPs) for quality-- places the emphasis where it belongs while still satisfying the needs of all countries.

In summary, the United States believes the upgrade reflected by these sections of the Code of Practice of Fish and Fish Products appear to meet the particular needs of member nations in producing and importing seafood products. The thousands of species of food organisms involved, the nature of their mostly wild capture source, and the complexity of safety and other serious defects characteristic of these products have been dealt with effectively through the use of safety and quality recommendations.

Section 2.1

UNITED STATES OF AMERICA

The definition for “**biotoxins**” is out of alphabetical order; it should be the first term defined.

“**Pre-Requisite Programs,**” the complete reference for the General Code of Practice for Food Hygiene should be used: *Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1-1969, rev. 3 (1997))

The definition of “**Shelf Life**” refers to the absence of excessive decomposition by citing sensory qualities. We suggest rewording the definition to account also for chemical analyses for decomposition as follows:

“**Shelf Life:** the period during which the product, at a specific storage temperature, maintains its microbiological and safety critical limits, and maintains its quality as determined by sensory or chemical analysis for decomposition.”

SECTION 3.4.1

FINLAND

The table concerning a typical cleaning and disinfecting process gives an impression that cleaning includes only the application of detergent. Perhaps mechanical treatment of surfaces would be more appropriate. Section 3.6 one point could possibly be added: containers used for dispatch or storage should provide adequate draining for melting water.

SECTION 3.7

FINLAND

Traceability should be extended up to the consumer: each container of fish or fishery product intended for the final consumer or for further processing should be clearly marked to ensure the traceability of the producer, of the lot and of the catch area.

UNITED STATES OF AMERICA

The term "traceability" should be in brackets until Codex defines the term.

Section 4

FINLAND

The first paragraph gives an impression that pesticides and veterinary drugs known to exist in fish can be processed to lower the concentration. The reactions of veterinary drugs for example in heat treatment are mostly unknown or even more toxic compounds can be formed. Processing is not an acceptable way to deal with residues.

UNITED STATES OF AMERICA

Section 4.1.1.4, paragraph 2, third sentence, "It concerns..." should be replaced by ""Ichthiosarcotoxins include ..."

The headings in Section 4.1.1.4, "Biotoxins" should be adjusted as follows: The three main headers, which should not be indented, are Scombrototoxin, Phycotoxins, and Tetrodototoxin. The other headers, Ciguatotoxin, PSP/DSP/ASP/NSP, should be indented as subheaders.

For style conformity, the Ciguatotoxin description should delete the first 6 words and begin with "Ciguatotoxin...".

4.2 last sentence contains a typographical error. The sentence should read, "...fish, fillets, and other fish and shellfish and their products..."

Section 5

NEW ZEALAND

Sections 5 to 13 use “potential” hazard as a standard terminology. It is suggested that this terminology be replaced with “hazards reasonably likely to occur”, followed by “examples”. This would be consistent with the *International Recommended Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1- 1969, Rev. 3, 1997).

SECTION 5.1

NEW ZEALAND

Add “commercially sterilised” into the example box for “Important final product characteristics” in Table 5.1.

Figure 5.1 should be presented as in diagram 2 of the *International Recommended Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1- 1969, Rev. 3, 1997), including the notes that assist in determination of unacceptable and acceptable level of hazard

UNITED STATES OF AMERICA

Section 5.1, last paragraph, last sentence; insert "processing plant/commodity" before "...specific basis...".
Figure 5.1, item 13 insert DAP as follows; "13. Review HACCP/DAP Based Plan"

1. Section 5.3 would benefit from the following:

- the Scope should not include hazard identification;
- paragraph four refers incorrectly to the processing facility or product being controlled. Suggested rewording, "The design of this programme should identify and analyse hazards, and identify critical control points in the operation where the hazards will be controlled";
- suggest that records should be maintained "to assist" verification and evidence of the plant's quality assurance programme; and
- the paragraph on verification activities should be included without italics, and further developed in respect of record-keeping, e.g., add a new sentence "Records demonstrating that verification activities are being undertaken on an on-going basis should be maintained" etc.

SECTION 5.3.3.2

NEW ZEALAND

Section 5.3.3.2 should be consistent with the application of hazard analysis as described in the *International Recommended Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1- 1969, Rev. 3, 1997). When a list of hazards that are reasonably likely to occur has been assembled, hazard analysis should be undertaken to decide whether they could be present at levels that would be unacceptable in terms of risks to human health. Using the word "significant" in relation to identification of hazards confuses this issue in 5.3.3.2.

SECTION 5.3.6

NEW ZEALAND

Section 5.3.6: use "critical limits(s)" rather than "critical limit"

SECTION 5.3.7

NEW ZEALAND

In Section 5.3.7, the second-to-last sentence should be reworded, e.g., "The record should demonstrate that control of the process has been re-established, that appropriate product disposition has occurred and that preventative action has been initiated"

SECTION 5.3.9

NEW ZEALAND

In Section 5.3.9, the following changes are suggested:

- "Documentation may include hazard analysis, CCP determination, critical limit determination, and procedures for monitoring, corrective action and verification"
- "Monitoring and corrective action records ..."

Section 6

FIGURE 6.1

SOUTH AFRICA

The flow diagram in Figure 6.1 must be revised to ensure that the correct sections are referenced (in some instances there is no correlation, e.g. Section 6.1.7)

The arrow in Figure 6.1 from “Packaging Storage” should also be connected to Processing Steps 11 and 25 in the flow diagram in order to be meaningful.

SECTION 6.2

SOUTH AFRICA

The heading should be changed to read “Processing of Vacuum and Modified Atmosphere Packed Fish. Frozen and fresh fish as well as fish portions are vacuum packed and the hazards are essentially the same.

SECTION 6.2.2

SOUTH AFRICA

(Processing steps 11,14 and 31). The hazard of the germination of *Clostridium botulinum* spores, which may be present in the product, should be considered.

Problems may arise when temperatures of chill storage (Step 14) and retail storage (Step 31) are above 4°C and there are no other obstacles (e.g. a high salt content) to inhibit the growth of *Clostridium botulinum*. Normal spoilage organisms may deplete any available oxygen and then anaerobic pathogens may grow. Studies in the USA have indicated that the temperature abuse of fish packed to the exclusion of oxygen may indeed be a hazard.

Steps 20, 30 and 31. These sections must still be developed. Under Section 6 provision should be made for a heading and reference to the relevant sections.

FIGURE 13.1. FLOW CHART FOR CANNED FISH.

SOUTH AFRICA

The following wording should be added at Steps 1 and 2: “Container and lids/caps reception” and “Container and lids/caps storage”. The inspection and storage of lids and caps should also be addressed.

PARAGRAPH 13.2.1. B. CHEMICAL HAZARDS

SOUTH AFRICA

We recommend that the words within brackets (e.g. lead.....) be replaced by the words (e.g. toxic metals or other compounds.) This wording will also provide for metal coatings or lacquers and sealing compound.

SECTION 13.4.7.2

NEW ZEALAND

Suggest “Subsequent microbiological contamination due to a bad seam”, and further consequential changes throughout the document.

MEXICO

SECTIONS 1, 2 (2.1, 2.2 y 2.9), 3 - 6 and 13.

- We suggest modifying the definition of raw materials, resulting in the following form:
"Raw materials, fish and/or parts of fish, fresh or frozen, that can be used to produce fish products intended for human consumption ".

- We suggest eliminating in the scope of application the word “retail”, since independently of the type of sale that is dealt with, the handling of the product should conform to the same Code.
- In the third bullet of point 3.2.2, we suggest removing the last part, which makes reference to detergents and disinfectants, since they have no relation to the point.
- We suggest including in point 3.5.1 a bullet indicating the need to have sanitary mats at the entrance and exit of the processing areas.
- In the fourth bullet of point 3.5.2, we suggest that in addition to the washing of hands, disinfection of hands be included, when applicable.
- In Table 5.4, in the “Chemicals” row, we suggest substituting the word “Recontamination” with “Additional contamination”, since the first term would only apply if the contamination in the product had first been eliminated, followed by a recontamination of the product at a later stage.
- In point 6.1.4, 4th bullet, we suggest modifying the text to the following: “Recycled water should be treated in order to avoid the presence of pathogenic microorganisms and recirculated to avoid the development of microorganisms”.
- In the heading for Table 5.6, we suggest modifying the title to the following: “Example of the hazard that the survival ... represents... “.

(Other comments concern only the Spanish version)