

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. 3

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 AND PROPOSED DRAFT SECTIONS

GOVERNMENT COMMENTS AT STEP 3 AND STEP 6

(Canada)

CANADA

General Comments:

1. Canada generally supports the Draft Code of Practice for Fish and Fishery Products but recognizes that a number of issues will need to be resolved by this Committee.
2. In previous sessions, the Codex Committee on Fish and Fishery Products revised the text in Section 5 - HACCP & Defect Action Point (DAP) Analysis, to:
 - emphasize flexibility in the optional use of HACCP principles for DAP analysis;
 - provide necessary guidance in addressing non safety attributes.Canada supports these two fundamental principles.
3. The question of allergens in connection with the processing of fish and fish products does not appear to be addressed by this Code. Allergens, especially when included as non-fish ingredients, are a potential hazard for many of the types of products which are covered by this Code, including canned products, surimi, coated QF products, and aquaculture products. Consideration of allergens, either as part of the individual sections, or as a general topic pertinent to the whole code, would be a worthwhile addition.
4. Canada is of the view that Sections 3, 4 and 5 should concentrate primarily on the principles applied for the hygienic handling and production of fish and fishery products. Although Section 4.1 - Potential Hazards Associated with Fresh Fish and Shellfish contains important general information, Canada questions its current location in the Code because the nature of the information differs somewhat by presenting the principles of the pre-requisite program, HACCP and DAP analysis. To enhance continuity of presenting the principles of a food safety management system, Canada suggests that Section 4.1 should be moved into an annex and then referenced in Section 5.
5. Canada notes that the relevance of the potential hazards and defects identified in some of the processing sections should be further assessed and carefully considered. In the eventual task of examining and possibly revising the lists of potential hazards and potential defects across the relevant sections of the Code, consideration should be given to take into account the guidance from the "How to Use this Code" section. In the 4th paragraph, it states that the ". . . format in these Processing Sections has been designed for maximum 'ease of use' and therefore the '**potential hazards**' or '**potential defects**' are listed only where they may be introduced into a product or where they are controlled, rather than repeating them at all the intervening processing steps."

6. Canada believes that the presentation of potential hazards and defects across the processing sections within the Code will require further evaluation. There is a concern that variations in wording of a potential hazard will lead to confusion and reduce the user-friendliness of the document. For instance, Canada notes that there are eight different terms being used to describe “pathogenic microorganisms” as a potential biological hazard.

Specific Comments:

SECTION 2 - DEFINITIONS

7. **Section 2.3 - Molluscan Shellfish (“Purification”)**

The definition of “*purification*” in this section which states “. . . *the removal of microorganisms from the molluscan shellfish . . .*” differs from the text in Section 7.4 - Relaying which states “*Relaying is intended to reduce the level of biological contaminants . . .*” The term “*removal*” could imply total elimination.

Canada is of the view that the wording in Section 7.4 is more appropriate in light of safety limits that exist for microorganisms and therefore suggests that the definition for “purification” should be amended as follows: “. . . the **reduction** of microorganisms from the molluscan shellfish . . .”

SECTION 4 - GENERAL CONSIDERATIONS FOR THE HANDLING OF FRESH FISH AND SHELLFISH

Section 4.1 - Potential Hazards Associated with Fresh Fish and Shellfish

8. Section 4.1.1.2 - Bacteria, 3rd Paragraph (beginning with “*Indigenous pathogenic bacteria . . .*”), last sentence: Concerning the clause “*hazards from these pathogens can be controlled by heating seafood sufficiently to kill bacteria . . .*” Canada is of the view that heat treatment is one measure that can be used to control pathogens. There are other methods such as the use of salt and adjusting pH, that can also inhibit pathogenic microorganism activity. In providing useful guidance for the application on HACCP principles for controlling food safety issues, a statement dealing with the control measures for the pathogens should be strengthened. A suggested wording is as follows: “**When controlling hazards associated with pathogens in the finished product, the use of the following processes, where appropriate, should be explored: heating seafood sufficiently to kill the bacteria, the application of safety parameters (pH, water activity, salt), holding fish at chilled or frozen temperatures and minimizing the potential for post process cross-contamination.**”

AQUACULTURE PRODUCTION - SECTION 6 (Part II - Annex 2)

Section 6.3 - Production Operations:

9. Section 6.3.2 - Veterinary Drugs, 2nd Bullet: Concerning the clause, “. . . *with particular attention to withdrawal periods,*” Canada believes that proper control of withdrawal periods is the primary means of ensuring that veterinary drug residues meet regulatory and international requirements. Consequently, Canada is of the opinion that the issue of “*withdrawal period*” should be given greater attention in this section. Consideration should be given to addressing “*withdrawal period*” independently with specific technical guidance on how withdrawal could be controlled. Canada suggests the addition of the following bullet point: “**Prior to administering veterinary drugs, a system should be in place to monitor the application of the drug to ensure that the withdrawal time of the batch of treated fish can be verified.**”

MOLLUSCAN SHELLFISH - SECTION 7 (Part II - Annex 2)

Section 7.1 - General Remarks, Addition to Pre-requisite Programme

10. 4th Paragraph (beginning with “*The control of hazards . . .*”):
3rd sentence: Concerning the clause, “. . . *although it is known that for especially viruses and for natural occurring bacterial pathogens the indicator is not working properly,*” Canada would like clarification on its purpose in the Code. The statement appears to be contradictory to the first portion of the same sentence which suggests that “*E. coli/faecal coliforms or total coliforms may be used as an indicator for . . . bacterial and viral pathogens.*” Rewording is suggested.

Last sentence: Concerning the clause, “. . . *long term relaying is required . . . risk of viral contamination,*” Canada’s distinction in the criteria used for relaying and purification is based on bacterial load, not necessarily viral contamination risk. Therefore, Canada suggests that the circumstances for relaying should be broadened and wishes to provide the following suggested wording: “. . . long term relaying is required

. . . risk of **microbiological** contamination.”

11. 8th Paragraph (beginning with “*Mussels, oysters, manilla . . .*”): Concerning the clause, “. . . scallops may not be suitable for purification”, Canada is of the view that the Code should not discount the possibility of applying purification systems for cleansing scallops at this time because science and emerging technology may support their application in the future. We suggest that the clause, “. . . scallops may not be suitable for purification,” should be deleted.

Section 7.2 - Classification and monitoring of growing areas

Section 7.2.1 - Classification of growing areas

12. 2nd Paragraph (beginning with “*When pollution sources have been identified . . .*”); 1st Sentence: Concerning the clause “. . . sampling stations for water, molluscan shellfish and/or sediments should be established . . .”, Canada wishes to note that in some countries, the established national shellfish sanitation program classifies growing areas based on the sampling of growing water only and recommends that this practice should be recognized. Canada recommends amending the clause and a suggested wording is as follows: “. . . sampling stations for water **and/or molluscan shellfish and/or sediments should be established . . .**”
13. 5th Paragraph (beginning with “*In determining the public health suitability . . .*”):
1st point: Concerning the clause, “*Classification/reclassification of growing areas by frequent monitoring of E. coli/faecal coliforms or total coliforms,*” Canada supports the classification/ reclassification of growing areas by monitoring of E. coli/faecal coliforms or total coliforms. However, we have a slight concern with recommending “*frequent monitoring*” since it is unclear in this provision as to what “*frequent*” means. Therefore, Canada would like to suggest an amendment that would allow competent authorities to develop a frequency of monitoring classification/ reclassification of growing areas that can be deemed appropriate. A suggested wording is as follows: “*Classification/reclassification of growing areas by the monitoring of E. coli/faecal coliforms or total coliforms **at an appropriate frequency.***”
2nd Point: Canada wishes to note that in some countries, the established national shellfish sanitation program classifies growing areas based on the sampling of growing water only and recommends that this practice should be recognized. Canada recommends amending the clause and a suggested wording could be as follows: “*Closure/Reopening of growing areas by the monitoring of algae in seawater **and/or** biotoxins in shellfish **at an appropriate frequency.***”

Section 7.4 - Relaying

14. 2nd Paragraph (beginning with “*Relaying is intended . . .*”), last sentence: Concerning the clause “. . . soft shell clam *Mya arenaria* can not be relayed,” Canada is of the view that the Code should not discount the possibility of applying relaying for cleansing soft shell clams. We would support relaying of this clam provided that the process is scientifically validated and can be verified. Therefore Canada suggests that the clause “**Some species such as the soft shell clam *Mya arenaria* can not be relayed**” should be deleted.

PROCESSING OF FRESH, FROZEN AND MINCED FISH - SECTION 6 (Part I - Annex 1) / SECTION 8 (Part II - Annex 2)

Section 8.1 - Finfish Preparation:

15. Section 8.1.3 (AKA 6.1.3 in Part I - Annex 1) - Frozen Storage: Canada is of the opinion that “*viable parasites*” should be the only potential hazard at this step. If measures outside of the prerequisite program are not considered, inadequate freezing time may result in an inadequate treatment of living parasites. Where freezing is used to control the hazard of “*viable parasites,*” Canada believes that consideration should be given to provide additional technical guidance. A suggested wording could be as follows: “**For killing of parasites harmful to human health, the freezing temperature and monitoring of duration of freezing should be combined with good inventory control to ensure sufficient cold treatment.**”

PROCESSING OF LOBSTERS AND CRABS - SECTION 13 (Part II - Annex 2)

Section 13.2 - General considerations for the Handling of Lobsters and Crabs

16. Chemical Hazards, Biotoxins Section: Canada would recommend that the reference to PSP toxin in lobsters be clarified in that accumulation of PSP is generally limited to the hepato-pancreas (*Shumway, S.E, 1995*). This may also be the case for crabs identified in the first sentence and should be verified. For the last sentence, Canada would like to provide the suggested wording as follows: “**PSP toxins have also been**

identified in the hepato-pancreas of lobsters.”

PROCESSING OF CANNED FISH AND SHELLFISH - SECTION 13 (Part I - Annex 1) / (Part II - Annex 2)

Section 16.2 (AKA 13.2 in Part I - Annex 1) - Identification of hazards and defects

17. Section 16.2.1(A2) (AKA 13.2.1 in Part I - Annex 1) - Hazards (Microbiological Toxins - Clostridium botulinum), 1st sentence: Concerning the clause, “The botulism risk usually appears after an inadequate heat processing and inadequate container integrity,” Canada believes that the potential risk of post process contamination due to contaminated cooling water or wet, unsanitary conveying equipment should be incorporated. We would like to offer the following suggested wording to help strengthen this section: **“A higher risk of botulism could result from any of the following: inadequate heat processing, inadequate container integrity, unsanitary post process cooling water and unsanitary wet conveying equipment.”**
18. Section 16.2.1(A2) (AKA 13.2.1 in Part I - Annex 1) - Hazards (Microbiological Toxins - Staphylococcus aureus): If warm wet containers are handled in an unsanitary manner, the post process contamination with S. aureus becomes a potential risk. This should be incorporated. Canada would like to suggest the inclusion of an additional sentence, after the first sentence and would offer the following wording: **“After canning, there is also the potential risk of post process contamination with S. aureus if the warm wet containers are handled in an unsanitary manner.”**

Section 16.4 (AKA 13.4 in Part I - Annex 1) - Pre-cooking and other treatments

19. Section 16.4.9.2 (AKA 13.4.9.2 in Part I - Annex 1) - Heat Processing Operation: An important aspect of the vent procedure is that it must produce results consistent with the temperature distribution study. A suggested wording for an additional technical guidance point, after the 4th bullet is as follows: **“In applying the venting procedure, valves need to be fully opened or closed during the venting steps and therefore it may be necessary to use an orifice plate in the steam supply line so that the steam valve does not need to be adjusted during the vent.”**
20. Section 16.4.10 (AKA 13.4.10 in Part I - Annex 1) - Cooling, 1st bullet, 2nd sentence: Concerning the clause, “only potable chlorinated water should be used . . .,” Canada wishes to recognize that there are other treatments such as UV, which could successfully treat recirculated water. Canada is of the view that the Code should not discount the possibility of applying other methods of water treatment at this time because science and emerging technology may support their application in the future. The existing wording could also be strengthened in relation to the potential hazard. For clarity, a suggested wording could be as follows: **“in the case of recycling, potable water should always be chlorinated (or other appropriate treatments used) to minimise the risk of contamination from water being sucked into the container while the can is forming a vacuum during the cooling stage.”**