codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 4 **CX/FFP 02/4**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS
Twenty-fifth Session
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DRAFT STANDARD FOR SALTED ATLANTIC HERRING AND SALTED SPRATS
GOVERNMENT COMMENTS AT STEP 6
(Canada, Israel, United States)

CANADA

General Comments:

1. Canada generally supports this document but recognizes that the specific issues in this standard require further discussion by the Committee.

2. Existing Codex standards for fish and fishery products have prescribed a systematic approach to conduct sensory and physical examination on a product in order to determine its compliance. These steps are historically incorporated into Codex fish and fishery standards and identified in "Annex "A": Sensory and Physical Examination. To ensure uniform application of the Draft Standard for Salted Atlantic Herring and Salted Sprats, Canada recommends that the procedures for sensory and physical examination of a product should be elaborated and the format should be consistent with existing Codex Standards.

Specific Comments:

SECTION 2 - DESCRIPTION

Section 2.2 - Process Definition

3. The numerical references in this draft standard should be verified. For instance, the numerical reference (5.3.1.1) for "*Very lightly salted fish*" should be "**2.2.2.1**".

Section 2.2.2.1 - Very lightly salted fish

4. The proposed definitions for "very lightly salted fish" and "lightly salted fish" do not address the salt content when it is exactly 4g/100g water phase. Canada recommends using the definition in the Salted Fish section of the Code of Practice which reads as follows: "the salt content in the fish muscle is 4g/100g **or less** in the water phase."

SECTION 3 - ESSENTIAL COMPOSITION AND QUALITY FACTORS

Section 3.4 - Decomposition

5. The histamine level of 10 mg/100 mg cited in this draft standard is incorrect. The histamine level should read "**10 mg/ 100g**" as stipulated in paragraph 115 of the report of the 24 th Session of the CCFFP (Alinorm 01/18).

SECTION 5 - HYGIENE AND HANDLING

6. Certain foreign material (glass, etc.) can present a physical public health hazard. Canada suggests including a provision to address this in the Hygiene section. Wording from existing Codex Commodity

Standards is as follows: "**The final product shall be free from any foreign material that poses a threat to human health.**"

Section 5.1

7. The numerical reference (iv) for "the Recommended International Code of Practice for Frozen Fish (CAC/RCP 16-1978) is inaccurate and should be replaced with "(iii)".

Section 5.3.1 - Parasites

8. Canada is of the opinion that the proposed wording of "*Fish flesh shall not be obviously infested with parasites*" could be open to several interpretations. The term "obviously infested" could apply to parasites that are noticeable to the naked eye or could imply that fish flesh has an abundance of parasites present. Canada further notes that living larvae of nematodes that are of public health significance have already been covered in Section 5.3.2 and questions the need for Section 5.3.1 - Parasites when Section 8.1.2 - Parasites, in the "Defectives" section, covers the same issue. Canada feels that the provision in Section 8.1.2 - Parasites in the "Defectives" Section is much clearer in addressing the infestation of parasites and would recommend that Section 5.3.1 be deleted to improve clarity.

9. Please refer to comments on Section 8.1.2 - Parasites

SECTION 6 - LABELLING

10. Since the product can also be marketed for further processing and packed in bulk, Canada is of the view that labelling provisions for non-retail containers should be included in this section and recommends that the text of the "**Labelling of Non-Retail Containers**" section that appears in existing Codex Commodity standards should be used.

SECTION 7 - SAMPLING, EXAMINATION AND ANALYSIS

Section 7.4 - Determination of Water Content

11. Canada questions the need to specify a method for the determination of water content when "water content" has not been used as an inspection criteria in the standard. Canada recommends that the method for the determination of water content should be deleted.

SECTION 8 - DEFINITION OF DEFECTIVES

Section 8.1.2 - Parasites

12. Canada has a slight concern with the proposed wording of this provision because the "*presence of*" parasites in a sample unit, (this being, the entire container), would mean that the finding of any parasite in a piece of fish would render the entire container defective. This would not be very applicable since parasites in fish are known to occur. In addition, the proposed wording would create confusion with the application of Section 5.3 - Parasites that allows for parasites and describes the requirement for addressing viable parasites in fish. The elaboration of tolerances and consideration for the various products described in the Section 2.1 - Product Definition, would help clarify the defective of parasites for this product.

Section 8.1.3 - Odours and flavour / taste

13. "*Contamination by foreign substances*" can have adverse human health implications because the nature of chemicals such as "fuel oil" and "cleaning compounds" is unknown and their toxicity could be potentially high. Canada is of the view that chemical contamination of a health and safety nature should not be allowed in any sample unit. Consideration should be given to deleting the phrase "*or contamination by foreign substances (such as fuel oil, cleaning compounds, etc.)*" To retain its importance in the standard, a provision could be included in the Hygiene section to address this issue. Wording from existing Codex Commodity Standards is as follows: "**The product shall not contain any other substance in amounts which may present a hazard to health in accordance with standards established by the Codex Alimentarius Commission**"

ISRAEL

Paragraph 2 – Distribution

We propose the introducing of the definition Matje herring. The product definition may be young fat herring with gonads only slightly or not developed.

2.2 Process definition

The salting process of very lightly salted fish, lightly salted fish and medium salted fish can't prevent the development of *Clostridium botulinum*. So I propose to change this paragraph.

Paragraph 4 – Food Additive

Color: In many countries it isn't permitted the utilization of colors in salted fish. This is also the case in the EEC directives and U.S.

The color E 143 Fast Green FCF don't appear on the list of the approved food colors in EEC directives and the using of this color is problematic.

Paragraph 5.4 – Histamine

The contain of 20 mg. histamine per 100 g fish muscle is in contradiction with the paragraph 3.4

UNITED STATES

We are concerned that the *Clostriduim botulinum* hazard has not been fully addressed in this Standard. We believe that *C. bot* is a likely hazard in salted uneviscerated fish greater than 12.5 cm. in length. Also, *C. bot* is a likely hazard of modified atmosphere packaged salted fish especially product below 5g/100g water phase salt.

Specific comments follow:

Section 2.1, Product definition, add "Whole uneviscerated fish, "headed only" or "gibbed fish" of 12.5 cm or greater in size are excluded as raw material."

Reason: The viscera of whole fish are known to harbor *C. bot* and its spores. A reduced oxygen tension can exist in the cavity. Per definitions in Section 2 for headed and gibbed we believe there can be enough viscera remaining for *C. bot* spores to be present and produce with the right time/temperature for the formation of toxins.

Section 2.2.2.1, very lightly salted fish, delete "4" and substitute "5."

Section 2.2.2.2, lightly salted fish, delete "4" and substitute "5."

Reason: When salt is used as the only barrier to *C. botulinum*, 5% water phase salt (wps) inhibits the outgrowth and toxin production by nonproteolytic strains of *C. botulinum*, and refrigeration at 4^0 C inhibits proteolytic strain of *C. botulinum* as well as other pathogens. These definitions add clarity as to when product temperature is critical for control of *C. botulinum* toxin formation.

Section 5, Hygiene And Handling, add a new section on *Clostridium botulinum*:

"5.5 Product below 5g/100g water phase must be frozen or have temperature monitors indicating that the product is maintained at 3.3^0 C."