

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 3

CX/FFP 03/3-Add.1

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

Twenty-sixth Session
Ålesund, Norway, 13 - 17 October 2003

DRAFT STANDARD FOR SALTED ATLANTIC HERRING AND SALTED SPRATS

GOVERNMENTS COMMENTS AT STEP 6 (Canada, Israel, United States)

CANADA

General Comment

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

Specific Comments:

SECTION 5 - HYGIENE AND HANDLING

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

SECTION 6 - LABELLING

1. Paragraph 2 and 3: With respect to the two requirements which states: "*Information specified above . . . on the container*" and "*However, lot identification . . . identifiable with accompanying documents,*" Canada notes that these requirements are associated specifically with the labelling of non-retail containers. For consistency with existing Codex fish and fishery products standards, Canada recommends adding a new subsection called "**Labelling of Non-Retail Containers**" where these two requirements can be included.

SECTION 7 - SAMPLING, EXAMINATION AND ANALYSIS

1. Section 7.1 - Sampling Plan for Containers (Barrels)

Canada has a concern that this standard is proposing that the entire barrel is a sample unit. For the inspection of salted Atlantic herring and sprats especially by an importing country, treating the entire container as a sample unit will have great cost ramifications for the processor and/or importer due to economic loss. Canada is of the view that Codex should allow flexibility for applying other validated sampling schemes that are statistically-based, minimizes costs and practical to apply.

Canada notes that the Section 7.1 Sampling Plan for Containers (Barrels) is identical to the adopted sampling plan in the “Standard for Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh” (CODEX STAN 165-1989 (REV. 1 - 1995)). While the frozen fish block sampling plan applies to bulk products, a fundamental difference between salted Atlantic herring and sprats and frozen fish block is that it is relatively simple to sample a single salted fish from a barrel compared to sub-sampling an individual fish from a frozen fish block.

Canada is of the opinion that since it is possible and practical to sub-sample salted Atlantic herring and sprats in barrels, **we recommend replacing the sampling plan for containers (Section 7.1 (i) and (iii)) with the adopted sampling plan outlined in the Standard for Quick Frozen Finfish, Uneviserated and Eviscerated (CODEX STAN 36-1981 (REV. 1 - 1995) or the Standard for Quick Frozen Fish Fillets (CODEX STAN 190 - 1995).** This would mean that the sampling of lots for examination of this product should be performed in accordance with the FAO/WHO Codex Alimentarius Sampling Plan for Prepackaged Foods (AQL-6.5) CAC/RM 42-1977 and that a sample unit could be either the individual fish or the primary container.

SECTION 8 - DEFINITION OF DEFECTIVES

2. Section 8.1.2 - Parasites

With regards to the clause under discussion: “*the presence of readily visible parasites in a sample of the edible portion of the sample unit detected by normal visual inspection of the fish flesh,*” Canada would like to propose the following provision for discussion:

8.1.2 Parasites:

The presence of two or more parasites, with a capsular diameter greater than 3 mm or a parasite not encapsulated and greater than 10 mm in length, per kg of the edible portion of the sample unit detected by normal visual inspection of the fish flesh.

Our proposal is based on the knowledge that raw material used to produce salted Atlantic Herring and Sprats would presumably have to meet the requirements of “Standard for Quick Frozen Fish Fillets” (CODEX STAN 190 - 1995) or the “Standard for Quick Frozen Finfish, Uneviserated and Eviscerated” (CODEX STAN 36-1981, Rev. 1 - 1995) therefore, Canada has incorporated the parasites provisions, as appropriate, into this standard for consistency purposes. Canada did not feel a need to deviate widely from adopted standards. See comparison chart attached.

Section 8.1.3 - Odours and flavour / taste

1. With respect to the clause “. . . *contamination by foreign substances (such as fuel oil, cleaning compounds, etc.,*” Canada recalls the discussion on the Definition of Defectives section of the “Draft Standard for Dried Salted Anchovies” where the Committee agreed to delete this phrase. To retain its importance in the standard, the Committee also agreed to include a new paragraph on contamination by foreign substances in the Hygiene section. The Committee recognized that this was consistent with the approach taken in other standards for fish and fishery products (Alinorm 03/18, para 23). For consistency, Canada recommends deleting the phrase “*or contamination by foreign substances (such as fuel oil, cleaning compounds, etc.,*”

Comparison of Parasites Requirements (as a Quality Defect)

This table was designed to compare the requirements across existing Codex Quick Frozen Fish Standards addressing parasites as a quality defect. Taking into consideration the Codex approach and for maintaining consistency, Canada recommends revisions to the sampling and inspection of parasites in the Draft Standard for Salted Atlantic Herring and Sprats (Alinorm 03/18, Appendix IV).

SECTION	Standard for Quick Frozen Fish Fillets (CODEX STAN 190 - 1995)	Standard for Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh (CODEX STAN 165-1989 (REV. 1 - 1995)	Standard for Quick Frozen Finfish, Uneviscerated and Eviscerated (CODEX STAN 36-1981, Rev. 1 - 1995)	Draft Standard for Salted Atlantic Herring & Sprats (at Step 6)
Scope	This standard applies to quick frozen fillets of fish as defined below and offered for direct consumption without further processing. It does not apply to products indicated as intended for further processing or for other industrial purposes.	This standard applies to quick frozen blocks of cohering fish flesh, prepared from fillets ¹ or minced fish flesh or a mixture of fillets and minced fish flesh, which are intended for further processing.	This standard shall apply to frozen finfish uneviscerated and eviscerated.	The standard applies to salted Atlantic herring (<i>Clupea harengus</i>) and sprats (<i>Sprattus sprattus</i>). The product is prepared from fresh or frozen fish. The fish is salted as whole fish or as headed or nobbed or headed and gutted or gibbed or filleted (skin-on or skin-off) fish. The product is either intended for direct human consumption or for further processing
Defect Definition and Limit	Parasites The presence of two or more parasites per kg of the sample unit detected by the method described in 7.4 ¹ with a capsular diameter greater than 3 mm or a parasite not encapsulated and greater than 10 mm in length.	Parasites The presence of two or more parasites per kg of the sample unit detected by a method described in 7.4 ¹ with a capsular diameter greater than 3 mm or a parasite not encapsulated and greater than 10 mm in length.	None Specified Only flesh abnormalities - gelatinous condition/ > 86% moisture, resulting from parasitic infestation are dealt with.	Provision at Step 6: [The presence of readily visible parasites in a sample of the edible portion of the sample unit detected by normal visual inspection of the fish flesh.] <u>Proposed Revised Wording:</u> <i>The presence of two or more parasites, with a capsular diameter greater than 3 mm or a parasite not encapsulated and greater than 10 mm in length, per kg of the edible portion of the sample unit detected by normal visual inspection of the fish flesh.</i>

¹ Procedure for the Detection of Parasites (Type 1 Method) in skinless fillets

<p>Sampling (for examination of parasites)</p>	<p>Codex sampling plan AQL 6.5. A sample unit is the individual fish or the primary container.</p>	<p>The sample unit is the entire block according to a specific sampling plan in S. 7.1 of the Standard. (not AQL 6.5)</p>	<p>Codex sampling plan AQL 6.5. A sample unit is the individual fish or the primary container.</p>	<p>Sampling plan for barrels has been copied from the adopted sampling plan in the Standard for Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh (CODEX STAN 165-1989 (REV. 1 - 1995) For products in smaller containers the Codex Sampling Plan (AQL 6.5) should be applied. <i>Canada recommends replacing the sampling plan for containers (Section 7.1 (i) and (iii)) with the adopted sampling plan outlined in the Standard for Quick Frozen Finfish, Uneviscerated and Eviscerated (CODEX STAN 36-1981 (REV. 1 - 1995)).</i> This would mean that the sampling of lots for examination of the product could also be performed in accordance with the FAO/WHO Codex Alimentarius Sampling Plan for Prepackaged Foods (AQL-6.5) CAC/RM 42-1977 and that a sample unit could be either the individual fish or the primary container.</p>
---	--	--	--	---

Method of Analysis	Procedure for the Detection of Parasites (Type 1 Method) in skinless fillets The entire sample unit is examined non-destructively by placing appropriate portions of the thawed sample unit on a 5 mm thick acryl sheet with 45% translucency and candled with a light source giving 1500 lux 30 cm above the sheet.	Procedure for the Detection of Parasites (Type 1 Method) in skinless fillets The entire sample unit is examined non-destructively by placing appropriate portions of the thawed sample unit on a 5 mm thick acryl sheet with 45% translucency and candled with a light source giving 1500 lux 30 cm above the sheet.	None specified	See proposed revised wording in the “ <i>Defect Definition and Limit</i> ” section above.

ISRAEL

Section 2 – Description

2.1 Israel suggests the following text: The product is prepared from fresh or frozen fish. The fish is salted as gutted or filleted.

2.2 We propose the following text: In order to prevent the development of *Clostridium botulinum* the fish should be eviscerated prior to brining and the temperature should be sufficiently controlled.

4. Food Additive.

We propose to delete the antioxidant E 310 Propyl gallate. This antioxidant is not permitted in European Community in fish products.

7. Sampling, Examination and Analysis

It isn't clear if the sampling plan included also histamine sampling.

9. Lot Acceptance

In this section isn't included the requirement about histamine. In our opinion no sample unit shall contain Histamine that exceeds 20 mg. per 100g fish muscle and no more than one unit that exceeds 10mg per 100g fish muscle.

UNITED STATES

Amend **2.1 Product Definition** as follows:

After the first sentence, insert a new second sentence as follows:

“Countries may allow this product in an uneviscerated state or may require evisceration since the margin of error in the control of *Clostridium botulinum* is small even when good practices are followed and the consequences are severe.”

Amend **2.2. Process Definition** by deleting the second sentence and replacing it with the following:

“In order to control *Clostridium botulinum* in uneviscerated fish, the fish must be held at or below 3.3C (38F) throughout the brining or salting process until the salt concentration at the core – the deepest part of the viscera – has reached a concentration of at least 5% salt by weight or a water activity below 0.97. If proteolytic *C. botulinum* may be present, the salt concentration must reach 10% or there should be a water activity below 0.93.”