



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

**Thirty-First Session**

**Tromsø, Norway**

**11 – 16 April 2011**

**PROPOSED DRAFT REVISION OF THE PROCEDURE FOR THE INCLUSION OF ADDITIONAL  
SPECIES IN STANDARDS FOR FISH AND FISHERY PRODUCTS  
COMMENTS AT STEP 3**

**(Argentina, Egypt, New Zealand)**

**ARGENTINA**

**GENERAL COMMENTS**

Argentina is grateful for the opportunity to comment on this document which we consider to be of enormous importance for clarifying the procedure that must be followed for the inclusion of additional fish species in the standards for fish and fishery products.

In general terms, Argentina agrees with the outline of the document, however, we believe that it is necessary to revise its scope and objectives as put forward at the 33rd meeting of the Codex Committee on Fish and Fishery Products held from 28 September to 2 October 2009, in Agadir, Morocco.

**SPECIFIC COMMENTS**

**Page 97 of the Spanish version, Point II.1) (*page 99 of the English version*)**

**With regard to sub-paragraph d)**

In particular, we consider that the conventional taxonomical methods are an appropriate tool for the classification of species within the context of the international trade of fishery products, so it is this procedure that should prevail for the reference classification.

*Justification:* Argentina considers that the difficulty of arriving at a consensus within the Codex when complicated commercial issues arise is not sufficient reason for limiting or underestimating the use of a procedure that has been proven to be appropriate and widely used historically as a reference method.

**With regard to sub-paragraph e) regarding “molecular data, achieved with recognized and appropriate methods (e.g. electrophoretic protein profile and/or specific DNA sequence3)”**

Argentina agrees with the concerns raised by some countries regarding the operational difficulty for its application, and the controversy that may arise in reaching agreements on the similarity between conventional species using this method.

Consequently, Argentina would see the said paragraph retained between brackets and analysed at the next Committee meeting to determine whether there is any imperative need to include in the supporting report data regarding the genetic sequence or electrophoretic profile as proof of the identification of a species.

Failing which, Argentina would suggest deleting the said requirement. On the other hand, if it were to be considered for inclusion for use in exceptional cases, said exceptional nature should be made evident through the establishment of criteria or parameters that clearly define the said situation.

**Page 97 of the Spanish version, Footnote No 3 referring to sub-paragraph (e) of Point II.1**

*“When the country does not have access to this type of method, it may obtain existing data from scientific institutions recognised at international level or request that a competent laboratory perform the analyses in order to have reference data for the description and identification of the species. Moreover, there are public access databases on the internet such as Fishtrace or Fishbol”.*

Argentina suggests the following changes to the wording:

**“When the country does not have access to this type of method, it may obtain existing data from scientific institutions recognised at international level or request that a laboratory recognized by the competent authority perform the analyses in order to have reference data for the description and identification of the species. Moreover, there are public access databases on the internet such as Fishtrace or Fishbol.”**

**Justification:**

Argentina considers that the proposed text more clearly defines the status of the competent laboratory.

**EGYPT**

Egypt approves the proposed draft.

**NEW ZEALAND**

New Zealand notes that the draft procedure seems unduly complex and requires too much active work by the CCFFP. Inclusion of species for the most part should be subject of a simple administrative procedure that does not consume a disproportionate amount of the Committee’s time.

Many cases for inclusion of species are straightforward and in recent times some have been dealt with by the CCFFP in expedient fashion. This draft procedure would appear to be much too onerous except in the case where inclusion of a species is contentious or the scientific justification presented by the applicant country is insufficient to be able to make a determination.

In many cases, provision of information adequately identifying the species and its taxonomy and anatomy, together with sufficient information about the nature of its products and volume in trade should suffice for the Committee to be able to agree to recommend inclusion of a species without further evaluation being required. For example, addition of a lobster or crab to the relevant standard. This information contained in sections II.1 to II.3 of the draft evidentiary dossier.

For some products, particularly processed products, further information may be required. The procedure should therefore note that for some products and species sensory evaluation may also be required.

It is New Zealand’s view that in the first instance, it should be for the applicant country to determine suitable laboratories that carry appropriate accreditation and submit that information in its evidentiary dossier as well. New Zealand notes that if the laboratories used for this work internationally routinely carry out inter-laboratory tests to ensure consistency between sensory panels it should not be necessary to submit samples to more than one laboratory.

The formation of an electronic working group to oversee work on every application is not a good use of Committee members’ time and these should only ever be employed in the event that there is major disagreement around inclusion of a species. These should only ever form with the agreement of the CCFFP and not because a procedure requires it.