

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Forty-eighth Session

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COMMENT OF SOUTH AFRICA

RECOMMENDATIONS TO CCFH:

1. Japan and the United States should draft revised histamine guidance taking into consideration the existing format of the Code and minimization of cross-references. Elaboration of a new annex or section for histamine control guidance should be considered; however, the Code needs to be carefully studied, and the final format may need to be reconsidered when the draft document is available for comment.

SOUTH AFRICA'S POSITION - South Africa supports the consolidation of a histamine control technical guidance into one document - to be annexed to the COP for fish and fishery products. Rationale: Histamine control is fairly uniform during various operations and process steps for fishery products.

2. Integrate the Table without data on annual production, histidine level, and market names (Family and scientific names only). CCFH should discuss the purpose of inclusion of the table, and, depending on the purpose, the inclusion of Salmonidae should be decided.

SOUTH AFRICA'S POSITION - South Africa supports the removal of the mean annual production, market name and histidine levels from an adapted version of Table 2.3.

Rationale: Mean annual production is not directly relevant to the table of susceptible species and it is a criterion to assist in determining the amenability to propose a new standard. Only Scientific names should be used because market names vary between countries and some countries may have several different market names for a single species. Providing histidine levels from the limited studies that have been done may also give a false impression of relative risk from the different species so inclusion of histidine (or histamine) levels should be avoided.

South Africa request Salmonidae to be excluded when incorporating Table 2.3 into the Code.

Rationale: Not enough data is available to support the inclusion of the Salmonidae in the table. As more information and data become available, the table to be updated to include not only Salmonidae, but also other susceptible species.

3. Replace the existing susceptible Family lists in commodity standards with a reference to the updated susceptible species list (reformatted table). Locate the list in the Code (as appropriate during revision). Consider locating the list (or applicable species in the list) as an annex in the applicable commodity standards, in addition to the Code.

SOUTH AFRICA'S POSITION - South Africa supports to replace the existing species lists with a reference to the new table which will be updated during revision of the Code.

Rationale: this will facilitate the updating of one table.

4. Japan and the U.S. should draft the revision of the Code of Practice for Fish and Fishery Products for EWG comment following CCFH48 (November 2016). Subsequently, Japan and the U.S. should prepare the histamine sampling plan guidance document for EWG comment following CCFH49 (November 2017).

SOUTH AFRICA'S POSITION - South Africa supports the start on Histamine Control Guidance first, followed later by Histamine Sampling Plan Guidance.

Rationale: This approach is logical and allows adequate time to reflect on the possible content of the future sampling plan guidance to be developed.

5. CCFH should discuss and determine if alternative sampling plans are needed (in commodity standards or the Code), and if so, clearly define the purpose. If an alternative sampling plan purpose is agreed to, then Japan and the U.S. should research and draft sampling guidance for this purpose, in addition to drafting guidance for the risk-based plan used to determine individual lot compliance with the commodity standard. It is recommended that only the purpose, and not a specific plan, is discussed before the EWG document is produced. CCFH work in this subject area should be scientifically sound and feasible to implement.

SOUTH AFRICA'S POSITION - South Africa supports the development of sampling plans for different purposes that are based on risk taking into consideration the safety limit in the specific commodity standards. Such sampling plans to be feasible and practical.

Rationale: South Africa mainly trade in susceptible species that consist of lots with various suppliers of the raw materials.
