



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

Thirty-fifth Session

Working by correspondence

7 - 17 October 2024

MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION
AND OTHER SUBSIDIARY BODIES

A. MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION (CAC44 and CAC46)

MATTERS FOR ACTION

Inclusion of two species (*Sardinella fimbriata* and *Sardinella sirm*) to the Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981)¹

1. CAC44 (2021) discussed an issue concerning two species, *Sardinella fimbriata* and *Sardinella sirm*, that were not included in the *Standard for Canned Sardines and Sardine-Type Products* (CXS 94-1981), despite the decision of CAC13 (1979) and CCFFP22 (1996) to include them in CXS 94-1981, and of CAC15 (1983) to issue a corrigendum rectifying the accidental omission of the two species.
2. CAC44 agreed to refer this issue to CCFFP36 for further consideration.

Adoption of the General Standard for the Labelling of Non-Retail containers of Foods (CXS 346-2021) and consequential amendments to the Codex Procedural Manual

3. CAC44 adopted:
 - the *General Standard for the Labelling of Non-retail Containers of Foods* (CXS 346-2021); and
 - the consequential amendment to the Codex Procedural Manual (i.e., the Format for Codex Commodity Standards, section on labelling) (Annex I).
4. CAC44 requested the commodity committees to review the labelling provisions for non-retail containers in existing and draft standards in light of the new standard for the labelling of non-retail containers.
5. Proposals for the consequential amendment in the fish and fishery products standards are contained in Annex II.
 - Table 1 includes standards for which it is suggested that the existing provision for non-retail containers be replaced with the Procedural Manual text for the labelling provision for non-retail containers.
 - Table 2 includes standards for which it is suggested that the existing provision for non-retail containers be replaced with the Procedural Manual text for the labelling provision for non-retail containers, but with some additional text.
 - Table 3 includes standards for which the addition of a provision for non-retail containers in line with the Procedural Manual text for the labelling provision for non-retail containers is suggested.

MATTERS FOR INFORMATION

Editorial amendments to *Standard for Canned Sardines and Sardine-Type Products* (CXS 94-1981)²

¹ REP21/CAC paragraph 103 and 104

² REP21/CAC paragraph 102

6. CAC44 (2021) adopted editorial corrections to most of the species names in Section 2.1, product definition of the English version of the *Standard for Canned Sardines and Sardine-Type Products* (CXS 94-1981).

Application of the Statements of Principle concerning the role of science in the Codex decision-making process and the extent to which other factors are taken into account (SoP)³

7. CAC46 (2023) reiterated its previous conclusion that the draft guidance remained serviceable and available as practical guidance for Chairpersons of CAC and its subsidiary bodies and for Members in situations when there is agreement on science but differing views on other factors/considerations. CAC46 also agreed on the need to gain more experience on application of the draft guidance, and to revisit the draft guidance in the light of experience gained.

New Food Sources and Production Systems (NFPS)⁴

8. CAC46 (2023) highlighted the importance of addressing challenges posed by NFPS and the important role Codex could play in this; noted that the current working mechanisms were adequate to address any new work on NFPS that Members might propose; and encouraged Members to submit discussion papers or new work proposals, either to active Codex committees or to the Executive Committee through the Codex Secretariat.

Codex Strategic Plan 2026-2031⁵

9. The preparation of the Codex Strategic Plan 2026-2031 started at CCEXEC84 (2023), at which CCEXEC agreed a structure and timetable, with the goal of delivering a new Codex Strategic Plan, a monitoring framework, and implementation work plans before 1 January 2026, and ensuring Member's engagement and ownership throughout the process. CCEXEC85 (2023) further agreed that a Circular Letter be issued to Members and Observers to gather their comments on this part and that the Chairperson and Vice-Chairpersons of CAC, with the support of the Coordinators, convene informal consultations to encourage interaction, discussion and reflection.

10. CCEXEC86 following a thorough discussion, agreed:

- i) on the following three strategic goals and one functional goal:

Strategic goals

- Respond to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards
- Strengthen relationships with relevant international organisations, promoting an integrated approach to address global challenges
- Maximize the impact of Codex by increasing the visibility and use of standards

Functional goal

- Enhance work management systems and practices that support the efficient and effective achievement of all strategic plan goals

- ii) to request the Codex Secretariat to issue a Circular Letter in September 2024 requesting comments on the agreed draft strategic goals and outcomes from all Codex Members and Observers.

New standards or review of standards and guidelines⁶

11. At the request of the WHO representative, CCEXEC83 (2022) agreed to request that Codex committees, when prioritizing and undertaking work on new standards or the review of standards and guidelines relating to composition of foods, have due regard to ongoing global efforts to achieve health and nutrition related goals through reducing non-communicable diseases (NCD) risk factors such as sodium intake.

Classification of Foods and Animal Feeds (CXA 4-1989)⁷

12. CAC46 adopted the revision to the *Classification of Foods and Animal Feeds* (CXA 4-1989): Revised Class B – Primary commodities of animal origin, and Class E – Processed foods of animal origin, which completed the revision of the Classification.

³ REP22/EXEC2 paragraph 82; REP22/CAC paragraph 22 (iv-vi); REP23/CAC paragraph 194 (ii, vi, vii)

⁴ REP23/CAC paragraph 206 (i, ii & iii); REP22/CAC paragraph 31 (ii & v)

⁵ CX/EXEC 24/86/4; EXEC86/CRD05 (Chairperson of CAC); REP24/EXEC1, paragraph 79

⁶ REP22/EXEC2, paragraph 154 (v)

⁷ REP23/CAC, paragraph 98

B. MATTERS ARISING FROM CODEX SUBSIDIARY BODIES

42nd Session of the Codex Committee on Methods of Analysis and Sampling (CCMAS42)⁸

13. CCMAS42 (2023) agreed to inform relevant Codex committees of the revised *General Guidelines on Sampling* (CXG 50-2004) and request these committees to review their sampling plans in light of the revised Guidelines and reminded them that sampling plans should be developed as needed in compliance with CXG 50-2004 and not by a reference to CXG 50-2004.

43rd Session of the Codex Committee on Methods of Analysis and Sampling (CCMAS43)⁹

14. CCMAS has been reviewing all methods in the single reference, the *Recommended Methods of Analysis and Sampling* (CXS 234-1999), to ensure it is up to date. CCMAS has completed the review of methods for fish and fishery products, and all methods in the CCFFP standards will be moved into the *Recommended Methods of Analysis and Sampling* (CXS 234-1999).
15. CCMAS43 (2024);
- i) agreed to remove methods for which there were no provisions in corresponding fish and fishery product standards; or for which numeric performance criteria had been developed from the *Recommended Methods of Analysis and Sampling* (CXS 234-1999); and
 - ii) endorsed the methods as recommended in MAS43/CRD03 Appendix VII, Table 1 and took the following decisions:
 - a. the AOAC 920.04 and AOAC 920.03 methods for the determination of amino acid nitrogen in fish sauce currently listed in CXS 234-1999 were retained unchanged as no replacement methods could be found at this stage; and
 - b. noted that these AOAC methods determined ammoniacal nitrogen and not amino acid nitrogen and agreed to request clarification from CCFFP for the intended use of the provision in order to determine more appropriate methods for this provision.
16. Accordingly, CCMAS43 (2024) agreed to request CCFFP to clarify the intended use of the provision for amino acid nitrogen in the *Standard for Fish Sauce* (CXS 302-2011).
17. CCMAS43 endorsed the amended sampling plan for methylmercury contamination in fish.

52nd Session of the Codex Committee for Food Additives (CCFA52)¹⁰

18. CCFA52 (2021) agreed to:
- i) publish on the Codex website the document titled “Guideline on avoiding future divergence of food additive provisions in the *General Standard for Food Additives* (CXS 192-1995) (GSFA) with Commodity Standards” as an information document and inform the corresponding commodity committees of this document; and
 - ii) update the alignment future work plan contained in the Information Document titled “Guidance to Commodity Committees on the Alignment of Food Additive Provisions”.

54th Session of the Codex Committee for Food Additives (CCFA54)¹¹

19. CCFA54 (2024) agreed to the following goals for the work on alignment:
- i) to strengthen the GSFA as the single reference for food additives;
 - ii) to minimise the incorporation of specific food additive provisions in commodity standards as much as possible; and
 - iii) to ensure that the alignment work is completed, with any future specific food additive provisions developed by Commodity/Regional Committees being incorporated into the GSFA.

26th Session of the Codex Committee on Food Inspection and Export Certification Systems (CCFICS26)¹²

⁸ REP23/MAS paragraphs 75-81

⁹ REP24/MAS paragraphs 12, 24 (i),(ii), 25 and 26

¹⁰ REP21/FA, paragraphs 107 (i),(ii), Appendices XII and XIII

¹¹ REP24/FA, paragraph 149

¹² REP23/FICS paragraph 117 (a-c)

20. CCFICS26 (2023) agreed to inform other Codex committees about the proposed review and update of the *Principles for Traceability/Product tracing as a tool within a food inspection and certification system* (CXG 60-2006).

33rd Session of the Codex Committee on General Principles (CCGP33)¹³

21. CCGP33 (2023) following its discussion on update to the Guide to the procedures for the amendment and revision of Codex standards and related texts in the Codex Procedural Manual, agreed to inform other Codex committees of the ongoing work in this regard to better align with current practices in Codex and international publishing standards.

54th Session of the Codex Committee on Food Hygiene (CCFH54)¹⁴

22. CCFH54 (2024) agreed to postpone consideration of histamine sampling plans until the work on supporting information and tools for the application of the *Guidelines for sampling* (CXG 50-2004) was completed.
23. CCFH54 also agreed to return the draft Annex II on Fish and Fishery Products of the *Guidelines for the Safe Use and Reuse of Water in Food Production and Processing* (CXG 100-2023) to step 2/3 for further elaboration in particular of Sections 2 and 8, noting the general agreement on all other sections in Annex II, followed by circulation for comments at Step 3.
24. CCFH54 further agreed to forward the proposed draft revision on the *Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood* (CXG 73-2010) to CAC47 (2024) for adoption at Step 5, noting that all references to water remained in square brackets and that this document had been aligned with CXC 1-1969.
25. CCFH54 also agreed to revisit this text as soon as Annex II on Fish and Fishery Products of the *Guidelines for the Safe Use and Reuse of Water in Food Production and Processing* (CXG 100-2023) was completed.

17th Session of the Codex Committee on Contaminants in Foods (CCCF17)¹⁵

26. CCCF17 (2024) agreed to forward the:
- i) sampling plan for methylmercury contamination in fish to CAC47 for adoption at Step 5/8; and send the sampling plan to CCMAS43 for endorsement (see paragraph 17); and
 - ii) code of practice for the prevention and reduction of ciguatera poisoning to CAC47 for adoption at Step 5/8; and request the Codex Secretariat to publish the information on resources (examples of monitoring programmes and training and guidance resources) with the relevant links, as an information document.

RECOMMENDATIONS

27. CCFFP36 is invited to:
- i) note the information provided above;
 - ii) review the labelling provisions for fish and fishery products standards and consider whether the existing labelling provision for non-retail containers can be wholly replaced by reference to CXS 346-2021, if specific requirements should be retained or added in addition to the reference to CXS 346-2021, or if a labelling provisions for non-retail containers be added (see Tables 1 – 3 in Annex II);
 - iii) clarify the intended use of the provision for amino acid nitrogen in the *Standard for Fish Sauce* (CXS 302-2011) in response to the request from CCMAS43; and
 - iv) discuss and agree on the possible inclusion of *Sardinella fimbriata* and *Sardinella sirm* in the *Standard for Canned Sardines and Sardine-Type Products* (CXS 94-1981).

¹³ REP23/GP, paragraph 69

¹⁴ REP54/FH, paragraphs 15 and 89

¹⁵ REP54/CF, paragraphs 69 and 97 (i) and Appendix III and V

ANNEX I**AMENDMENT TO THE PROCEDURAL MANUAL**

CAC44 adopted the *General Standard for the Labelling of Non-retail Containers of Foods* (CXS 346-2021), as proposed by the CCFL46¹⁶. CAC44 also adopted consequential amendments to the section on Labelling in the Format for Codex Commodity Standards in the Procedural Manual (PM).

Section II - Elaboration of Codex Standards and Related Texts: Format for Codex Commodity**Standards: Section on labelling**

Replace the following text:

Where the scope of the Standard is not limited to pre-packaged goods, a provision for labelling of non-retail containers may be included:

In such cases the provision may specify that:

“Information on¹² shall be given either on the container or in accompanying documents, except that the name of product, lot identification, and the name and address of the manufacturer or packer shall appear on the container.¹³

However, lot identification, and the name and address of the manufacturer or packer may be replaced by an identification mark provided that such a mark is clearly identifiable with the accompanying documents.”

¹² Codex Committees should decide which provisions are to be included

¹³ Codex Committees may decide that further information is required on the container. In this regard, special attention should be given to the need for storage instructions to be included on the container.

With the following text:

Where the scope of the Standard is not limited to prepackaged foods, a provision for the labelling of non-retail containers may be included as follows:

“The labelling of non-retail containers should be in accordance with the *General Standard for the Labelling of Non-Retail Containers of Foods* (CXS346-2021).”

The section may also contain provisions which are exemptions from, additions to, or which are necessary for the interpretation of the General Standard in respect of the product concerned provided that these can be justified fully.

¹⁶ REP21/FL, paragraph 60 i, appendix III

ANNEX II**LABELLING PROVISIONS FOR NON-RETAIL CONTAINERS IN FISH AND FISHERY PRODUCTS STANDARDS**

As of July 2024, twenty-four (24) standards are under the purview of CCFFP.

Table 1 includes standards (14) where the Procedural Manual text for the labelling provision for non-retail containers is proposed to replace the text in the existing provision for non-retail containers, with no additional text required.

Table 2 includes standards (2) where the Procedural Manual text for the labelling provision for non-retail containers is proposed to replace the text in the existing provision for non-retail containers, but with some additional text.

Table 3 includes standards (8) where the Procedural Manual text for the labelling provision for non-retail containers is proposed to be added as there was no such existing provision. CCFFP is requested to consider for each of these standards to add the Procedural Manual text for the labelling provision for non-retail containers and also if there is a need to include some additional text.

Table 1: Standards (14) where the Procedural Manual text for the labelling provision for non-retail containers is proposed to replace the text in the existing provision for non-retail containers, with no additional text required. All the text in the current provisions listed would be replaced with “The labelling of non-retail containers should be in accordance with the *General Standard for the Labelling of Non-Retail Containers of Foods* (CXS 346-2021)”.

Reference	Title	Section	Current provision
CXS 36-1981	<i>Standard for Quick Frozen Finfish, Uneviscerated and Eviscerated</i>	6.4	Information specified above shall be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name and address, as well as storage instructions shall always appear on the container. However, lot identification, and the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.
CXS 92-1981	<i>Standard for Quick Frozen Shrimps or Prawns</i>	6.4	Information specified above shall be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name and address as well as storage instructions shall always appear on the container. However, lot identification, and the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.
CXS 165-1989	<i>Standard for Quick Frozen Blocks of Fish Fillets, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh</i>	6.4	Information specified above shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer or packer as well as storage instructions, shall appear on the container. However, lot identification, and the name and address of the manufacturer or packer may be replaced by an identification mark provided that such mark is clearly identifiable with the accompanying documents.
CXS 166-1989	<i>Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish</i>	6.3	Information specified above shall be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name and address of the

	<i>Portions and Fish Fillets - Breaded or in Batter</i>		manufacturers or packer, as well as storage instructions, shall always appear on the container. However, lot identification, and the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.
CXS 167-1989	<i>Standard for Salted Fish and Dried Salted Fish of the Gadidae Family of Fishes</i>	6.2	Information specified above shall be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name and address of the manufacturer or packer shall always appear on the container. However, lot identification, and the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.
CXS 189-1993	<i>Standard for Dried Shark Fins</i>	6.2	Information on the above provisions shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer or packer, shall appear on the container. However, lot identification, and the name and address of the manufacturer or packer may be replaced by an identification mark provided that such a mark is clearly identifiable with the accompanying documents.
CXS 190-1995	<i>Standard for Quick Frozen Fish Fillets</i>	6.4	Information on the above provisions shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer or packer as well as storage instructions, shall appear on the container. However, lot identification, and the name and address of the manufacturer or packer may be replaced by an identification mark provided that such a mark is clearly identifiable with the accompanying documents.
CXS 244-2004	<i>Standard for Salted Atlantic Herring and Salted Sprat</i>	6.2	Information specified above should be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name of and address of the manufacturer or packer or importer as well as storage instructions shall always appear on the container. However lot identification, and the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with accompanying documents.
CXS 302-2011	<i>Standard for Fish Sauce</i>	8.2	Information on the above provisions shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer or packer, as well as storage instructions shall appear on the container. However, lot identification, and the name and address of the manufacturer or packer may be replaced by an identification mark provided that such a mark is clearly identified with the accompanying document.
CXS 311-2013	<i>Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish</i>	7.4	Information specified above shall be given either on the container or in accompanying documents, except that the name of the product, lot identification, and the name and address of the manufacturer or packer, as well as storage instructions, shall appear on the container.

			However, the name and address of the manufacturer or packer may be replaced by an identification mark (e.g. plant approval number) provided that such a mark is clearly identifiable with the accompanying documents.
CXS 315-2014	<i>Standard for Fresh and Quick Frozen Raw Scallop Products</i>	7.4	Information specified above shall be given either on the container or in accompanying documents, except the name of the food, lot identification, and the name and address of the producer or the packer as well as storage instructions shall always appear on the container. However, the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents. The product shall be identified by common and/or scientific names as determined by the competent authority. The country where the product is sold can determine if the scientific name must be indicated on the label.
CXS 95-1981	<i>Standard for Quick Frozen Lobsters</i>	6.4	Information specified above shall be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name and address of the manufacturer or packer as well as storage instructions shall always appear on the container. However, lot identification, and the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.
CXS 191-1995	<i>Standard for Quick Frozen Raw Squid</i>	6.4	
CXS 312-2013	<i>Standard for Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for further Processing</i>	I-7.4 II-7.4	

Table 2: Standards (2) where the Procedural Manual text for the labelling provision for non-retail containers is proposed to replace the text in the existing provision for non-retail containers, but with some additional text. The text in the current provisions would be replaced with the text in the proposed provision listed in each case.

Reference	Title	Section	Current provision	Proposed provision
CXS 291-2010	<i>Standard for Sturgeon Caviar</i>	7.4	Each primary container shall be labelled with the number markings of the lot and the species. Information specified above shall be given either on the container or in accompanying documents, except that the name of the food, lot identification, and the name and address as well as storage instructions shall always appear on the container. However, lot identification as well as the name and address may be replaced by an identification mark, provided that such a mark is clearly identifiable with the accompanying documents.	Each primary container shall be labelled with the number markings of the lot and the species. The labelling of non-retail containers should be in accordance with the <i>General Standard for the Labelling of Non-Retail Containers of Foods</i> (CXS 346-2021).

CXS 292-2008	<i>Standard for Live and Raw Bivalve Molluscs</i>	1.7.4	<p>Labelling for live bivalve molluscs shall contain the following information:</p> <p>(i) Identification of the product by common and/or scientific names as determined by the competent authority. The country where the product is sold can determine if the scientific name must be indicated on the label.</p> <p>(ii) Information that might be needed in the event of a food safety problem, including lot identification which could be lot code or date and location of harvest, information about harvest area, date of harvesting, purification or relaying as appropriate, as well as identification of the despatch centre or other establishment from which they were shipped.</p> <p>(iii) Durability or shelf life.</p> <p>Date of minimum durability may be replaced by the statement "Bivalves must be alive when sold".</p>	<p>The labelling of non-retail containers should be in accordance with the <i>General Standard for the Labelling of Non-Retail Containers of Foods</i> (CXS 346-2021).</p> <p>In addition, the following should be included:</p> <p>(i) information that might be needed in the event of a food safety problem, including lot identification which could be lot code or date and location of harvest, information about harvest area, date of harvesting, purification or relaying as appropriate, as well as identification of the despatch centre or other establishment from which they were shipped.</p> <p>(ii) Durability or shelf life.</p> <p>Date of minimum durability may be replaced by the statement "Bivalves must be alive when sold".</p>
		2.7.4	<p>Refer to 1.7.4 Labelling of Non-retail Containers.</p> <p>Every package containing bivalve molluscs that have been processed to reduce or limit target organisms must be provided with a label certifying that all molluscs have been processed to reduce the target organism to levels acceptable to the official agency having jurisdiction.</p> <p>Safety claims for bivalve molluscs processed to reduce or limit target organisms should be specific to the target organisms that have been reduced or limited as described in the <i>Code of Practice for Fish and Fishery Products</i> (CXC 52-2003).</p>	<p>Refer to 1.7.4 Labelling of Non-retail Containers.</p> <p>Every package containing bivalve molluscs that have been processed to reduce or limit target organisms must be provided with a label certifying that all molluscs have been processed to reduce the target organism to levels acceptable to the official agency having jurisdiction.</p> <p>Safety claims for bivalve molluscs processed to reduce or limit target organisms should be specific to the target organisms that have been reduced or limited as described in the <i>Code of Practice for Fish and Fishery Products</i> (CXC 52-2003).</p>

Table 3: Standards (8) where the Procedural Manual text for the labelling provision for non-retail containers is proposed to be added as there is no such existing provision. CCFFP is requested to consider for each of these standards to add the Procedural Manual text for the labelling provision for non-retail containers and also if there is a need to include some additional text.

Reference	Title
CXS 3-1981	<i>Standard for Canned Salmon</i>
CXS 37-1991	<i>Standard for Canned Shrimps or Prawns</i>

CXS 70-1981	<i>Standard for Canned Tuna and Bonito</i>
CXS 90-1981	<i>Standard for Canned Crab Meat</i>
CXS 94-1981	<i>Standard for Canned Sardines and Sardine-Type Products</i>
CXS 119-1981	<i>Standard for Canned Finfish</i>
CXS 222-2001	<i>Standard for Crackers from Marine and Freshwater Fish, Crustaceans and Molluscan Shellfish</i>
CXS 236-2003	<i>Standard for Boiled Dried Salted Anchovies</i>