

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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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

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REVISION OF THE CODE OF PRACTICE FOR FISH FISHERY PRODUCTS (CXC 52-2003) AND REVISIONS OF THE SECTION ON SAMPLING, EXAMINATION AND ANALYSIS RELATED TO HISTAMINE FOOD SAFETY

Comments of Norway, African Union

Norway

We appreciate this opportunity to submit additional comments upon the proposed amendments to the Code of practice for fish and fishery products (CXC 52-3002), in order to align the code with histamine control guidance.

(i) General Comments

Section 12 - Processing of salted and dried salted fish in the Code of Practice

With reference to our comments given in CX/FH 18/50/6 Add.1, we would like to clarify that Norway agrees that Section 12 covers all species of salted and dried salted fish. Furthermore, we support the inclusion suggested by the USA in CX/FH 18/50/6 Add.1.

To clarify the introduction even more, we suggest the following wording:

"This Section applies to ~~fresh~~, **all species of** salted and dried salted fish. ~~of the~~ **The** following species, all belonging to the Gadidae family, ~~intended for human consumption~~ **have the following scientific and common names:** Cod (*Gadus morhua*), Pacific cod (*Gadus macrocephalus*), Polar cod (*Boreogadus saida*), Greenland cod (*Gadus ogac*), Saithe (*Pollachius virens*), Ling (*Molva molva*), Blue ling (*Molva dypterygia*), Tusk (*Brosme brosme*), Haddock (*Gadus aeglefinus/Melanogrammus aeglefinus*), Forkbeard (*Phycis blennoides*) and Pollock (*Pollachius pollachius*). **Other species, including those that are susceptible to scambrotoxin formation, are covered by this section.**

Measures to control scrombrotoxin is not relevant for species that are non-susceptible for scrombrotoxin formation, such as species from the Gadidae family.

Sampling plans in the commodity standards

We support to use a 3-class sampling plan.

Rationale:

Table 8 (after Table 10 of the ICMSF publication) with examples on page 34 in CAC/GL 50-2004 describes classification of sampling plans according to nature of concern and hazard. According to Morocco's comment in CX/FH 18/50/6 Add.1, ICMSF consider histamine as a moderate hazard and not as a severe hazard. For moderate hazards ICMSF suggests using a 3-class sampling plan.

(ii) Specific Comments

Section 12 – Processing of salted and dried salted fish

12.2.1 Splitting, washing and rinsing (Processing Step 7)

Potential hazards: **unlikely scambrotoxin**

Potential defects: improper splitting, **decomposition**

Rationale:

The processing step "splitting" is only relevant for the production of salted, dried fish (klippfish), which is only produced from the species belonging to the Gadidae family. Scambrotoxin is not a potential hazard in these species. Therefore we suggest to remove "Scambrotoxin" as a hazard. Further, we suggest to remove

“decomposition”, in order to assure the consistence between scombrotoxin and decomposition as potential hazards and defects in the code. “Decomposition” is linked to the content of histamine in fish, as described in relevant Codex standards for fish.

12.4 Salting and maturing

Two particular conditions can adversely affect the quality of salted fish **of species belonging to the Gadidae family**, are the occurrence of bacteria and mould. Both defects can be combated by maintaining a temperature lower than 8° C (**ideally below 4° C**).

Rationale:

A temperature above 4° C is necessary to facilitate the maturing of salted fish. This paragraph applies to dried salted fish (klippfish), as it refers to halophilic bacteria present in salt. (With reference to the standards: Halophilic mould and pink are listed as defectives in the Codex standard for salted fish, not in the standard for salted herring and sprat.) Halophilic bacteria do not grow at temperatures below 8° C.

African Union

General Comments

The document as revised by the EWG has provided the necessary alignment of commodity standards across the relevant standards for fish and fishery products. African Union considers the proposed amended sampling plan as appropriate, however, African Union is of the opinion that the section on sampling may not be practicable due to the large sample size.

Section 12: Processing of salted and dried salted fish

Issue

Para. 1: Changing of the scope of the section not only to include fresh fish but all fish and the use of the term “**all species of**” in the first sentence.

Position

African Union does not support the amendment in the 1st paragraph

Rationale

The 1st section as amended seeks to change the scope of Section 12 (Processing of salted and dried salted fish). This was not the mandate of the EWG. The scope of the work of the EWG is to align the commodity standards and not to change their content.

Issue

Clause 9.1.1: The use of the terms ‘**parasites**’ and “**viable parasites**” is not harmonised in the text.

Position

African Union recommends the need to adopt the use of either “viable parasites” or ‘parasite’ throughout the document. This is necessary to ensure consistency in the use of the term.

Section 17.3.5.1 Fish preparation (Gutting, trimming etc.)

Issue

The use of the term “**biochemical development**” and ‘**histamine**’

Position

African Union recommends to delete the terms “**biochemical development**” and ‘**histamine**’ in bracket but to retain ‘scombrotoxin’. The sentence will therefore read “**microbiological contamination and biochemical development (histamine scombrotoxin)**”. Similarly modify potential hazards listed in Section 20.1 to read “**scombrotoxin and microbiological contamination**”

Rationale

To ensure clarity since scombrotoxin is the primary food safety hazard of concern.

Section 12: Processing of salted and dried salted fish

Issue

Use of the term “**species of**” in the sentence.

Position

African Union recommends to delete the word “**species of**” in the 1st sentence so that the sentence reads “**This Section applies to fresh, all species of salted and dried salted fish.**”

Rationale: There are no salted species of fish.

Issue

Section 9 of CXC 52 - 2003, 1st Sentence. The sentence includes detailed text that is already provided in the Guidance document for prevention of scombrototoxin contamination

Position

African Union recommends the sentence to read “*For fish susceptible to scombrototoxin formation, refer to Section 9-bis **for technical guidance for control of scombrototoxin**” ~~“Harvesting, Processing, Storage and Distribution of Fish and Fishery Products at Risk for Scombrototoxin (Histamine) Formation” for information on the control of histamine, including guidance for harvest vessel operations.~~*

Rationale

To ensure consistency in the way the guidance document is referenced.

Issue

Clause 9.1.5: Use of the terms, ‘**biotoxin**’ and ‘**scombrototoxin**’ in the same sentence.

Position

African Union recommends that scombrototoxin should be included as an example so that the sentence reads “**Potential hazards: microbiological contamination, biotoxins and e.g. scombrototoxin.**”

Rationale: Scombrototoxin is one of the biotoxins.

Issue

Para. 7.1 of Appendix II: “*Freshly harvested fish typically have histamine levels below 2 mg/kg and that operators applying HACCP may achieve a histamine level of less than 15 mg/kg.*”

Position

AU recommends the removal of the example that makes reference to 15mg/kg histamine.

Rationale: The example can be mistaken for acceptance criteria.

Issue

Use of the term “large lot” in the document.

Position

African Union recommends that the term “large lot” should be defined.