

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda 3, 4, 5

FFP/34 CRD/15

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

Thirty-fourth Session

Ålesund, Norway, 19 – 24 October 2015

COMMENTS OF REPUBLIC OF KOREA

Agenda Item 3

- **Related Section**

1. Reception of raw materials

1.1 Fish

Technical Guidance:

The 3rd bullet point:

Fish greater than 12 cm in length that required gutting on arrival at the processing facility should be gutted efficiently, without undue delay and with care to avoid contamination.

- Gutting is considered complete when the intestinal tract and internal organs have been removed.
- **Clean seawater** should be used.

- **Comments**

The Republic of Korea considers that “clean seawater” is an ambiguous expression. Thus, the Republic of Korea believes that it is necessary to set ~~separate~~ the water quality standard for seawater separately, and specify that it is required to wash by using seawater suitable for the water quality standard.

Agenda Item 4

- **Related Section**

X.2.3.1 Reception (shucked scallops) (Processing Step 8)

Technical Guidance:

The 5th bullet point:

Chemical contamination such as heavy metals, pesticide residues, **veterinary drugs**, etc.;

- **Comments**

The Republic of Korea believes that it is necessary to control veterinary drugs for the fishery products such as scallops, etc. Therefore, we propose adding “veterinary drugs” to the chemical contamination.

Agenda Item 5

- **Related Part**

Microbial hazards:

Proteolytic and non-proteolytic *Clostridium botulinum* is spore forming microbial hazards which should be controlled in packed caviar. These pathogens are controlled by and adequate quantity of salt (product salt content $\geq 3\text{g}/100\text{g}$ and $\leq 5\text{g}/100\text{g}$, $\geq 5\%$ in the water phase, or a water activity of ≤ 0.97 **≤ 0.94** and proper cold storage, (temperatures $\leq 4^\circ\text{C}$).

- **Comments**

According to several international scientific references, the conditions for the prevention and control of the survival, growth and toxin production of *Clostridium botulinum* are controlled in a water activity of <0.94 and temperature $\leq 4^{\circ}\text{C}$. Thus, the Republic of Korea requests to revise water activity as <0.94.

- **Related Section**

X.1. Live fish reception

Technical guidance:

The 9th bullet point:

In the case of fresh fish, the fish should be stored under refrigeration or in cold ($\leq 4^{\circ}\text{C}$) and clean water.

- **Comments**

The term, “fresh” implies the fish is dead so that it is necessary to clearly specify the temperature of refrigeration as $\leq 4^{\circ}\text{C}$ in order to control *Clostridium botulinum*.