CODEX ALIMENTARIUS COMMISSION

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World Health Organization

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Agenda Item 6 **CX/FFP 14/33/8 Add.2**
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Thirty-third Session

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PROPOSED DRAFT CODE OF PRACTICE ON THE PROCESSING OF SCALLOP MEAT (At Step 3 of the Procedure)

Comments submitted by Australia and African Union

AUSTRALIA

GENERAL COMMENTS

Australia would like to thank the working group for their efforts in progressing the Code of Practice. We feel that this work has greatly improved the brevity of the document. Australia offers the following general comments on the document as it currently stands:

Consistency with the Standard for Raw, Fresh and Quick Frozen Scallop Products

Australia agrees with the working group in that there is a lack of consistency between the Draft Standard for Raw, Fresh and Quick Frozen Scallop Products (currently at Step 6 of the procedure) and the draft Code of Practice; this is particularly the case in the definitions set out in the two documents. Australia considers that the Code of Practice should be brought into alignment with the standard, which is at a more advanced stage. However, in order to reduce workload of the committee in updating each document to reflect changes in the other, it may be appropriate to delay progression on this draft Code of Practice until the Standard is finalised.

Current draft Code of Practice not reflective of the Australian Fishery

Australia notes that the draft Code of Practice is primarily focused on long haul harvest vessels and, as such, is not reflective of some scallop fishery practices in Australia and possibly other countries.

In contrast to fisheries where scallops are shucked at sea and stored under refrigeration, some Australian fishery regulations prohibit shucking at sea and prescribe that all scallops must be landed in their shell. In this case, fishing efforts are short haul in nature and usually only extend for one to two days. Scallops are processed either as snap frozen in the shell (at sea) or live chilled in the shell for processing ashore as roe on scallops. Very few, if any, are processed as roe-off scallops.

In this vein, much of the draft is not relevant to these fisheries and further guidelines may be required to ensure different practices employed internationally are adequately covered.

Accordingly, Australia suggests amending Section X.3 to add a new section on ‘short haul voyages’ to the current Processing Operations section. This amendment results in 3 sub-sections: Long Haul Voyages; Short Haul Voyages and Processing facilities.

Most Australian vessels land the catch onto a stainless steel or aluminum tray and transport the product by conveyor to a tumbler where it is deluged in clean seawater under pressure to remove grit and dead shell and small scallops are returned to the sea through a series of holes that sort by shell size. Dead scallops are sorted from the catch and discarded at the final sorting before the scallops are transported by conveyor to be frozen

or chilled in a process that has them exposed to the elements for less than 10 minutes. This is a different method to those methods described in the draft document. Australia therefore recommends that t the draft be amended to reflect alternate practices, including that used in Australia.

In relation to dead scallops, Australia considers that there are two different scenarios. One is the scenario described in the present draft, where scallops that are dead when they come aboard should be discarded as it unknown how long they have been dead. A second scenario, relevant to Australia's short haul fisheries and one that is not accounted for in the present draft, is that scallops that were alive and healthy when landed on the vessel have been kept chilled on the vessel and some may have died after unloading and before processing. These scallops will have been kept chilled and unloaded within a time period that would not allow microbial growth and as such, likely do not present a risk to human health, unless biotoxins are a consideration. Australia recommends that the draft should also reflect this aspect and that whole scallops to be processed on-shore should be chilled immediately after catch and kept chilled through the landing, transportation and processing stages. If adequate chilling is not applied, dead scallops (that were live at capture) may have unacceptable meat and roe.

The Australian scallop industry does not support the use of adding water to scallops and considers this to be a misleading practice; this includes "inadvertently" adding ice to bagged scallops. Australia's preference would be to remove this category under the Code of Practice, but recognise that it may be acceptable in some countries. Therefore, Australia supports efforts to ensure that this issue be adequately dealt with through using appropriate labeling regulations.

Specific Comments:

Australia offers the following specific comments:

Section 2 Definitions

Amend the following definitions as follows:

~~**Roe On scallop** is the raw scallop adductor muscle meat and the attached roe remaining after the shell and viscera have been completely removed.~~

Roe on Scallops are fresh or quick frozen roe on scallops which are prepared by completely removing the adductor muscle and attached roe from the shell and detaching all other viscera to the extent practical. Roe-on scallops contain no added water, phosphates, or other ingredients. The adductor muscle and roe are presented whole.

~~**Scallop Meat** is the raw scallop adductor muscle meat remaining after the shell , viscera and roe have been completely removed.~~

Scallop Meat is fresh or quick frozen scallop meat which is prepared by completely removing the adductor muscle from the shell and completely detaching the viscera and roe from the adductor muscle of live scallops. Scallop meat contains no added water, phosphate or other ingredients. The adductor muscle is presented whole.

~~Scallop meat OR Roe- on Scallops with added solution of water and phosphate - is the quick frozen Scallop Meat or Roe- on Scallop with the addition of a solution of water and phosphate and optionally salt.~~

Quick frozen Scallop Meat or Roe-on Scallops processed with Added water and /or with Solution of Water and Phosphates is quick frozen "scallop meat, or "Roe-on Scallops", as defined above, with added water and /or solutions of water and /or phosphates. These may also contain salt.

~~**Scallop Meat or Roe- on Scallops with Added Water**: is the fresh Scallop Meat or Roe-on Scallop with water added as an ingredient.~~

Fresh Scallop meat or Roe-on Scallops with added water is fresh scallop meat or roe-on scallops with added water which contain roe-on scallops or scallop meat as defined above, with added water.

Scallop products include all of the above

Rationale: Definitions changed to bring them more closely into line with the draft Standard.

X.2.1.1 Marine Biotoxins

Marine biotoxins such as paralytic shellfish poisoning (PSP), amnesic shellfish poisoning (ASP) and diarrhetic shellfish poisoning (DSP) are not reasonably likely to present a hazard in properly processed commercial scallop adductor muscle meat. Scientific data has shown that when present, PSP, ASP and DSP toxins are concentrated in the viscera. ~~[During periods of high toxicity~~ **When algal blooms are present with high toxicity**, toxins can accumulate at a hazardous level in roe-on scallops and preventive measures should be in place in accordance with the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008).~~]~~ Biotoxins may also migrate into the adductor muscle (meat) if the viscera and roe are not removed while the scallop is alive. Scientific information is still limited for toxins in some scallop species therefore the hazard analysis will need to consider marine biotoxins in scallop meat as a potential hazard. This hazard will be excluded or included based upon the species, processing methods, and the available country specific scientific evidence data for toxins in that species.

During shucking to produce scallop ~~Meat~~ **products**, ~~incomplete~~ removal of the viscera and/or roe **to the best extent practical** ~~could~~ **should** occur ~~and mayintroduce~~ **to avoid** biotoxin and pathogen health hazards associated with whole bivalves.

Rationale: Editorial change to beginning of square bracketed text as the current wording makes the latter part of the sentence redundant .Changes to the second paragraph are made to reflect that if the roe remains, it is not possible to achieve a 100% removal of the viscera. Note: Australia has no objection to the removal of square brackets in the first paragraph.

X.3.1 ~~Operations~~ **Long Haul Harvest Operations**

Rationale: Changed for consistency with Table of Contents

X.3.1.1 Scallop Landing/Deck Dump (Processing Step1)

~~[~~Preventative measures such as on-board biotoxins screening methods should be used when the intent is to produce scallop meat for which marine biotoxins cannot be excluded as a hazard.~~]~~

Rationale: Australia has no objections to the removal of the square brackets in this section for long haul harvest vessels. If a new section is implemented for short haul vessels, this text may need adjustment in the new section.

X.3.1.3 Shucking (Processing Step 3)

- ~~[~~Dead scallops observed during shucking should be discarded because once a scallop dies

  biotoxins, if present in the viscera and roe, can migrate into the meat. In addition, the quality of the meat and roe in dead whole scallops may be unacceptable because the time of death is unknown.~~]~~
- Removal of the viscera and roe in live freshly harvested scallops prevents the migration of

  biotoxins, if present, into the adductor muscle (meat).
- For scallop meat, care should be taken to ensure that the viscera and roe are completely removed.
- For roe-on scallops, care should be taken to ensure that the viscera is removed **to the best extent practical**
- If biotoxins are present in the viscera control measures should be in place to ensure the roe-on scallops are safe for human consumption (i.e. further sampling of the edible portion).
- Care should bet ~~aken~~ **taken** to insure that shucking tables, containers, and knives are properly cleaned and sanitized.
- The shucked scallops should proceed immediately to the next steps to minimize their exposure to ambient temperatures above 4 °C.

Rationale: Australia has no objections to the removal of the square brackets in this section for long haul harvest vessels. If a new section is implemented for short haul vessels, this text may need adjustment in the new section. Changes to dot point 4 are made to reflect that if the roe remains, it is not possible to achieve a

100% removal of the viscera. Editorial change in the fifth dot point to remove spelling error. Changes to dot point 5 are made to reflect the need to sample the edible product, not just the roe.

X.3.2. Short haul harvest operations

[Text to elaborated]

Rationale: a new section added to ensure the Code of Practice represents the different practices used internationally.

X.3.2.1 Scallop Reception (Processing Step 8)

- ~~[~~For the marketing of roe-on scallops, a processor should have a process in place to ensure that the toxicity content meets the regulatory requirements of the official agency having jurisdiction over the harvest area. This could be accomplished by adhering to a toxin monitoring programs or end product testing.~~]~~

Rationale: Australia has no objections to the removal of the square brackets in this section.

- Scallop handlers and appropriate personnel should acquire skills in sensory **and physical examination** ~~evaluation~~ techniques to ensure incoming lots meet essential quality provisions of the Standard for Raw, Fresh and Quick Frozen Raw Scallop Products (under development).

Rationale: To increase consistency between the Code of Practice and the Standard.

Section X.3.2.11 Weighing (Processing Step 17)

Add the following text:

- **Measurement of net weight should comply with the provisions of the *Standard for Raw, Fresh and Quick Frozen Raw Scallop Products.***

Rationale: To increase consistency between the Code of Practice and the Standard.
AU

Comments/observations	Recommendations
Table of contents • **Section X.3.1** **Draining** should come as a separate step after the washing step as **X.3.1.5**. This is an important step to ensure adequate drainage. • **Section X.3.2** **Draining** should come as a separate step after the washing step as **X.3.2.5.** this is an important step to ensure adequate drainage.	Introduce drainage step as X.3.1.5 and change the subsequent nomenclature. Introduce drainage step as X.3.2.5 and change the subsequent nomenclature.
X.2.2.3 Added water undeclared or exceeding level declared • Second paragraph, 1st sentence to read: In the case of scallop products processed with a solution of water and phosphate, added water alone or optionally salt...	
• Figure X.1 – Flow chart Long Haul Harvesting Vessel Operation - Drainage step to be introduced after the washing step Processing facility operations - Drainage step to be introduced after the washing step - Temperature conditions to be indicated at the appropriate places in the flow chart	

X.3 Processing operations - Drainage shold be separated as a separate step from washing as X.3.1.5 - X.3.1.7: GMPs and GHPs should be applied in the listed processes during chilled storage (processing step 7) - X.3.2.5: All traceability rules should be applied.	