

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 6

CX/FFP 09/30/7-Add.1

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

Thirtieth Session

Agadir, Morocco

28 September – 2 October 2009

DRAFT CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS (OTHER SECTIONS INCLUDING SMOKED FISH)

COMMENTS AT STEP 3

(Ghana)

GHANA

Section 2.8 SMOKED FISH

Process Definition

“Wood”

Revision: In addition to the definition under wood, the following should be added:

Wood must come from a sustainable source and source must be traceable. Resinous wood and wood from mangrove should not be used.

Reason: Mangrove wood should not be used because of their peculiar importance for wetlands. Wood from sustainable source would protect the environment and promote environmental friendliness.

Section 12 Processing of smoked fish

Comments under this section are in relation to **hot smoked fish**.

Specific Comments on Fish Preparation

In Ghana, fish produced from the hot smoking process is not pre-salted **prior to** hot smoking. The flow chart in Figure 12.1 should therefore have a link where one can proceed directly to Hot Smoking after Fish Preparation. The fish should, however, be eviscerated during the fish preparation processing step as this can control and prevent *Clostridium botulinum* toxin formation.

Figure 12.1: Although Section 12.1 - Fish preparation, is incorporated in the flow chart, potential hazards and defects associated with this processing step as well as implementation control measures are not stated.

Revision: Ghana proposes that “**Fish Preparation**” be made Processing Step 1 and Pre-Salting Processing Step 2. Subsequent steps should be renumbered accordingly.

Reason: “Fish Preparation” is a major processing step and necessary to ensure that all Critical Control Points are identified in the HACCP Plan.

Ghana also proposes the inclusion of the following Potential Hazards, Potential Defects and Technical Guidance under Fish Preparation:

Fish Preparation

Potential Hazards: Microbiological, chemical and physical contamination, biochemical development

Potential Defects: Decomposition, physical contamination

Technical Guidance:

- Fish should be eviscerated
- The drying phase should be kept short as prolonged exposure to ambient temperature may lead to unwanted microbial growth.
- Avoid use of wood for the drying phase
- Materials impervious to water should be used
- Drying should not be done on the floor as rodents, flies may contaminate the fish
- Follow first in first out principle

Labelling/Cooling or Freezing/Storage

In Ghana, hot smoked fish are not cooled or frozen after labelling. This is because the storage process involves warm smoking. Moreover, there is some level of smoking to lower the moisture content of the fish in order to reduce any potential fungal growth.

Packing of hot and cold smoked products (Processing Step 7)

Revision: 1st Sentence under Technical Guidance (beginning with “Hot smoked fish is presented...”)

1. The sentence should read “Hot smoked fish are presented to the market in many forms but mostly in **aerated** boxes...”
2. “Prepackaged in plastic bags” should be replaced with “pre-packaged in **brown paper** or materials that do not generate heat nor pose a health risk”

Reason: Using aerated boxes ensures that too much heat is not generated unnecessarily as this can promote microbial contamination.

Storage, Distribution and Retail (Processing Steps 10, 11 & 12)

Revision:

1. Addition to the Potential Hazards, Potential Defect and Technical Guidance.
2. Editorial: 3rd sentence under Technical Guidance – change “en evacuated plastic bags” to “in evacuated plastic bags”.

Potential Hazards: Insect Infestation

Potential Defects: Broken pieces of fish

Technical Guidance:

- Re-smoking of hot smoked products at low temperatures if not going to be used immediately