

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
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Agenda Item 3b

CX/FFP 09/30/4

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 (CRABS AND RELEVANT DEFINITIONS)

COMMENTS AT STEP 6

(Australia, Brazil and Japan)

AUSTRALIA

xx.2.2 Minimise the Deterioration of Crabs – Handling

Under the third dot point "tanks and wells for pounding" should be changed to "tanks and wells for holding".

Reason: "holding" is the word used in the flow diagram and is less confusing than the word "pounding".

xx.3.1.1 Live Crab Reception (Processing Step 1)

- Under 'Potential Hazards', delete "Biotoxins (for certain species)"
- Delete of the second dot point under 'Technical Guidance'.
- Include in xx2.2, "Crabs should not be harvested during a toxic phytoplankton bloom to minimise the risk of the brown meat being contaminated with biotoxin."

Reason: Testing after harvesting is not an effective way of controlling biotoxin risk. It is more effective not to harvest when there is a potential for contamination.

xx.3.1.4 Cooking (Processing Step 4)

Insert a new dot point which says, "different staff should be involved in operations with cooked and uncooked crabs to minimise cross-contamination."

Reason: See comments below under xx.3.1.6.

xx.3.1.6 Sectioning/Meat Extraction (Processing Step 6)

- Under 'Technical Guidance' delete the second dot point.
- In xx.3.1.4 Cooking (Processing Step 4) insert a new dot point which says, "different staff should be involved in operations with cooked and uncooked crabs to minimise cross-contamination."

Reason: Appropriate section for this advice and minimises repetition.

- Fourth dot point - delete "it is recommended that all types of meat are" and replace with, "all types of meat should"

xx.3.2.7 Meat Extraction (Processing Step 7)

Delete the first dot point.

BRAZIL

Definitions:

Brazil proposes to add cooling definition:

Cooling: step after cooking and pasteurization to avoid overcooking and the development of thermophilous.

Delete the following definitions:

Systems lot, Tails and the separation of tail, the case of lobsters.

Brazil suggests that the definitions are in alphabetical order.

Section XX - Development of Crabs

xx.2.1.1 Parasites : add the following text:

...freshwater crabs eaten raw or uncooked.

Reason: it is considered a hazard only if consumed raw or uncooked crabs.

xx.2.1.1 Biotoxins. Brazil suggests deleting the term: PSP and ASP biotoxins.

Reason: replace the specific toxins for a generic term. Consistency with the text xx.3.1.1.

xx.3.1.5. Potential Hazards: replace microbiological contamination to microbiological growth.

Reason: if you used good manufactured practices, contamination should be under control.

xx.3.1.5., second bullet: Brazil suggests to mix the second bullet with the third bullet. The phrase will be rewritten: cooling should be completed as quickly as possible and a continuous basis.

Reason: improve the text

xx.3.1.5., fourth bullet: Brazil suggests the following text: the process of cooling should be done in a place without direct contact with the raw product:.

Reason: raw product and cooked product should not be in the same place to avoid cross contamination.

xx.3.1.6 Potential Hazards: Brazil suggests to add microbiological growth and biotoxins.

Reason: consistency with the bullet 1 in Technical Guidance and an abuse of time/temperature should be permit a microbiological growth.

xx.3.1.8. Potential Hazards: Brazil suggests to change survival of *Clostridium botulinum* spores to unlikely.

Reason: there is no such hazard, in weighing step.

xx.3.1.9 Primary Packing. First bullet. Change the word should to must.

Reason: These are primarily conditions to packages.

xx.3.1.10, Seventh bullet: Delete the bullet (in Spanish version)

Reason: there is a extra bullet in the Spanish version.

xx.3.1.11 Cooling. Third bullet. Change should to must.

Reason: To avoid contamination, should be used a chlorinated water.

xx.3.1.12. packaging / labeling. Potential defects: Delete dehydration.

Reason: The product has already packaged.

xx.3.1.12. packaging / labeling. Keep only the defect of incorrect labeling. Remove all the technical guidelines, but the first.

Reason: These guidelines fits (sets) only for primary packaged not for secondary.

Figure xx.2 Brazil suggests that the flowchart should be replaced by Frozen Cooked Crab (see Annex.)

Reason: The refrigerated one was cover by Figure xx.1. The new flowchart makes it easier to understand the whole process.

xx.3.2.5. Potential hazards: Replace microbiological contamination to microbiological growth.

Reason: the prerequisites should control the contamination.

xx.3.2.5., second bullet: replace the second and the third phrase to: “the cooling should be carried out continuously and as quickly as possible.”

Reason: The purpose of cooling is to avoid the overcooking and to prevent microbial proliferation. This process should be done as quickly as possible.

xx.3.2.5., fourth bullet: rewrite the sentence to: cooling in chill room should not be done with the raw product due to avoid cross contamination.

Reason: Raw product and cooked product must not be in the same sector.

xx.3.2.5. eighth bullet. Remove all examples.

Reason: It is better not to give examples in a general code.

xx.3.2.6. Potential hazards: Add microbiological growth and biotoxins and remove microbial toxin formation.

Reason: a deviation in time and temperature of this product may cause the multiplication of microorganisms and consistency with the bullet one of technical guidance.

xx.3.2.7. third bullet. Delete the brackets.

Reason: consistency with previous text.

xx.3.2.9 first bullet. Delete examples.

Reason: It is not recommended to use brine freezing systems because it can cause an excessive salt content in flesh.

xx.3.2.9 second bullet. Remove it.

Reason.: The same reason above.

xx.3.2.10. Glazing. Potential defects. Brazil suggests including another defect: add glazing water in the net weight.

Insert a new technical guidance: the weight of glazing water should not be included in the net weight of the product.

Reason: to avoid economic fraud to the consumer.

JAPAN

xx 2.1.1. Potential hazards

Biotoxins

Insert “DSP (okadaic acid esters) in Brown crabs” after “Brown crabs (*Cancer pagurus*)”.

PSP toxins (saxitoxins) and ASP toxin in viscera of Dungeness crabsred rock crabs (*Cancer productis*) and Brown crabs (*Cancer pagurus*). **DSP (okadaic acid esters) in Brown crabs.**

Reference: T. Torgersen *et al.* (2005) Diarrhetic shellfish poisoning by okadaic acid esters from Brown crabs (*Cancer pagurus*) in Norway. *Toxicon* 46(5): 572-578.

In 2002, there was an outbreak of DSP in Norway caused by contaminated brown crabs (*Cancer pagurus*).

xx.3.1.5 Cooling (Processing Step 5)*Technical Guidance:*

The 4th bullet point; “must” should be replaced by “should”.

xx.3.1.6 Sectioning/Meat Extraction (Processing Step 6)*Technical Guidance:*

The 2nd last bullet point; replace “free from” with “minimize”.

- Claws, leg tips and shell partsshould be kept chilled and ~~free from~~ contamination **should be minimised.**

Rational: Contamination can be minimised, but it is almost impossible to be free from contamination.

xx.3.1.8 Weighing (Processing Step 8)*Potential Hazards:*

Remove “Survival of *Clostridium botulinum* spores” from the *Potential Hazards*.

Rational: Survival of *Clostridium botulinum* spores is not relevant to weighing. It should be transferred to the Section XX.3.1.10 Pasteurization.

xx.3.1.10 Pasteurisation (Processing Step 10)*Technical Guidance:*

The 6th and 8th bullet points, “must” should be replaced by “should”.

xx.3.2.5 Cooling (Processing Step 5)*Technical Guidance:*

The 4th bullet point, “must” should be replaced by “should”.

xx.3.2.6 Sectioning (Processing Step 6) and xx.3.2.7 Meat Extraction (Processing Step 7)*Potential Hazards:*

“Recontamination with pathogenic micro-organisms” should be modified as “microbiological contamination” as it is the standardised terminology used in the Code of Practice for Fish and Fishery Products.