



Agenda Item 11

CX/FFP 12/32/11-Add.2

ORIGINAL LANGUAGE ONLY

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

Thirty-Second Session

Bali, Indonesia

1 – 5 October 2012

Proposed Draft Code of Practice for Fish and Fishery Products (section on Sturgeon Caviar)

COMMENTS AT STEP 3

(United States of America)

USA

General Comments

We commend the thorough research and attention to detail that is evident in the proposed draft. While much has been done, we feel that the document should remain at step 3 at this time for continued discussion and work, perhaps in a second electronic working group.

We believe that every effort should be made to remove or change the term “as allowed by the competent authority” because these phrases are not appropriate in international standards and codes of practice.

Since caviar is packaged anaerobically, the “General considerations” section could include a discussion of the combined water phase salt and refrigeration temperature required to control *Clostridium botulinum* growth and toxin formation (i.e., 5% WPS and 5° C).

Where 3-5% salt is suggested throughout the document, the required water phase salt (WPS) is not always listed. We recommend always listing “Greater or equal to 5% water phase salt” concurrently because 3% salt can result in less than 5% WPS (depending on egg moisture content).

Specific Comments

Definitions, Pasteurization: Define, or remove the word “grains” throughout the document:

Subjecting caviar ~~grains~~ to heat for a time and at a temperature, which inactivates spoilage and non-spore forming pathogenic micro-organisms of public health concern.

Reason: The term “grains” may not be understood, and is not needed. This may also be confusing in section 9.3 of the Caviar Standard where a defect is defined as “the presence of hard cover of caviar grains”.

X.1 Live fish reception: The title is not consistent with the discussion which includes receiving dead fish.

X.7 Laying induction by injection of hormones: Remove section.

Reason:

Hormones are only an example of an ovulation method in the Standard and countries do not agree on the use of hormones; therefore, a step dedicated to hormone injection should not be included in the COP.

This section discusses injecting the fish 1 to 3 times until the eggs are released, and then waiting between the injection time and consumption time to allow removal of residual hormones. We do not understand how hormone residue can be removed from the fish eggs after they are released and processed into caviar.

Withdrawal times would apply to live fish, not harvested eggs. Without evidence of a recognized scientific procedure for the methods listed, this step should be excluded.

X.8 Anaesthesia for big fish: This section needs more work.

Reason:

We do not understand the line, “the waiting time between application and harvest for human consumption must be respected”. Anesthesia is used at the time of harvest so there cannot be any waiting time.

Every effort should be made to reach agreement on allowed anesthesia because the term “as allowed by the competent authority” indicates that agreement has not been reached. Which anesthesia products are used?

X.10: Eggs treatment with shell improving agents: Remove section, or rework section and reach agreement on allowed texture improving agents to be listed in the Standard.

Reason:

“Texture improving agents” are specifically disallowed in the Caviar Standard. Agreement must first be reached on allowed texture improving additives in order to include this section. The conflict with the Caviar Standard is not resolved by listing “as approved by the competent authority”.

What are “hormonal releasing factors”? Are these drugs different from the synthetic hormones or carp pituitary extracts?

X.21 Weighing and labelling: Add the following technical guidance.

Refrigeration instructions must be clearly labelled because caviar with 5% water phase salt must be held at 5° C or below to prevent *Clostridium botulinum* growth and toxin formation.

X.22 Refrigeration, X.23 Cold storage and caviar recheck, and X.24 Transportation and distribution:

The refrigeration temperature is listed as “0° C to -4° C”. The first number is usually the lower temperature, therefore we wonder if the upper temperature should be positive 4 degrees Celsius instead of negative 4 degrees Celsius?