

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

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Agenda Item 8

**CX/FFP 00/8-Add.1
English and Spanish**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS
Twenty-fourth Session
Ålesund, Norway, 5-9 June 2000

PROPOSED DRAFT STANDARD FOR SMOKED FISH
GOVERNMENT COMMENTS AT STEP 3
(Canada, United States, Spain)

CANADA

Canada congratulates Denmark on their work in preparing the draft Standard for Smoked Fish and offers the following comments for consideration at the Codex Committee on Fish and Fishery Products (CCFFP).

SCOPE

At the 22nd Session (June, 1996) of the CCFFP¹, the Committee agreed to develop a standard for cold smoked fish and noted that the inclusion of other products be considered at a later stage. Canada suggests that consideration be given to the inclusion of fish products that have undergone the “hot-smoked” process and to smoked fish products that are not “pre-packed”.

DESCRIPTION

Product Definition

Canada suggests that the list of fish species should be expanded to include more finfish species, or should be generalized to allow for the inclusion of all finfish species, to allow for broader application of the standard.

Process Definition

Canada feels that there should be further discussion on the proposed salt content limit of less than 3% in the water phase as the basis for vacuum packaged products to be presented in the frozen state. The safety parameters used to control the hazard of Clostridium botulinum in vacuum packaged products must be identified and scientifically validated in discussing this issue.

In several existing Codex standards, such as the Standard for Quick Frozen Fish Fillets (CODEX STAN 190-1995), the freezing process is clearly described. For consistency, the Proposed Draft Standard for Smoked Fish should adopt the same terminology.

ESSENTIAL COMPOSITION AND QUALITY FACTORS

Since this standard covers species (e.g. herring) typically associated with histamine development, it would be appropriate to include a sub-section called “**Decomposition**” to address histamine as a spoilage indicator, using terminology similar to that in existing Codex standards for fish products.

Food Additives

¹ ALINORM 97/18, para 82

A list of food additives and their maximum levels should be elaborated in this section. This will allow the CCFFP and other appropriate Codex Committees to discuss those food additives which can be used in the production of smoked fish.

Final Product

The format of this section differs from the “Final Product” section of existing Codex standards. For consistency, Canada suggests using wording similar to that used in existing standards.

HYGIENE AND HANDLING

Under “**Test Results**”, in part (ii) dealing with histamine, it should be indicated that this only applies to the species of the *Clupeidae*, *Scombridae*, *Scombrosocidae*, *Pomatomidae* and *Coryphaenidae* families, to be consistent with existing Codex standards.

LABELLING

Net Contents

Paragraph 1 - The clause: “*Where sliced products are interleaved . . . including the interleaving sheets,*” appears to discuss specific details regarding the determination of net content. Canada is of the view that this methodology would be more appropriate in the “Sampling, Examination and Analysis” Section.

SAMPLING, EXAMINATION AND ANALYSIS

Determination of Net Weight

This section does not describe the procedures to be used for net content determination. Consideration should be given to further elaboration on the methodology to be employed in the determination of net content.

DEFINITION OF DEFECTIVES

Parasites

For the sections dealing with parasites, the same terminology as used in existing Codex standards, such as the Standard for Quick Frozen Fish Fillets (CODEX STAN 190-1995) should be adopted for consistency.

“ANNEX A” - END PRODUCT SPECIFICATIONS

Canada would like clarification on the intent of “Annex A” as it does not seem to be referenced in the Standard.

UNITED STATES

Process Definition:

Second paragraph, second sentence, change “3.0%” to “3.5%” so sentence reads:

“If the salt content of the product is less than 3.5% in the water phase and the product is packaged. To the exclusion of oxygen (e.g. vacuum packed) the product shall be presented deep frozen.”

Labelling:

If the product is frozen, the labelling should specify that the product must be kept frozen.

ESPAÑA

1.- OBSERVACIONES DE CARÁCTER GENERAL.-

Se deberían numerar de forma correlativa las distintas secciones que integran esta norma siguiendo el esquema general de las restantes Normas Codex para productos pesqueros.

2.- OBSERVACIONES DE CARÁCTER ESPECIFICO

Ambito de aplicación:

Se propone la siguiente corrección a la versión en español: donde dice “.. cortado en rodajas enfriado o congelado..” debe decir “... cortado en **láminas refrigerado** o congelado...”

Definición del procedimiento:

Donde dice: “ salazón según lo acostumbrado...” debería decir:” Se procede a la salazón según costumbre,...”

Donde dice: “...Ahumado según...”, debe decir: “...Se procede al ahumado según...”

Donde dice “... de Na Cl en la fracción acuosa...”, debe decir “... de Na Cl en la fase acuosa...”

Donde dice: “ ...a la que determinaría coagulación visible.”, debe decir :”... a la que causaría coagulación visible.”

Presentación:

En el apartado ii) donde dice “... cortado en rodajas o...” debe decir :”... cortado en láminas o.”

Materia Prima:

Donde dice: “...pescado de aleta eviscerado...”, debe decir: “...pescado eviscerado...”

Otros Ingredientes:

Debería especificarse que la sal debe cumplir con los requisitos establecidos en la Norma Codex para la sal de calidad alimentaria (Norma Codex Stan 150-1985)

Materias Extrañas:

Donde dice: “... amenaza para la salud humana.” debe decir: ”...peligro para la salud pública.”

Etiquetado:

En el apartado contenido neto, donde dice: “ ...entre las hojas de papel u otro material, etc..”, debería decir:” ...entre las hojas de papel u otro material adecuado para el contacto con alimentos, etc...”

Instrucciones de almacenamiento:

Donde dice: “...en condiciones de congelador...”, debe decir: “...en congelación...”

Además, si el producto que se vende es un producto descongelado, debe indicarse claramente en la etiqueta que se trata de un producto descongelado y no fresco.

Determinación de parásitos:

Donde dice: “...no destructivos a ojo descubierto.”, debe decir: “... no destructivos a simple vista...”

Definición de defectuoso:

Debe sustituirse “Definición de defectuoso” por “Definición de unidades defectuosas”.

Donde dice: “...propiedades que se definen..”, debe decir: ”...las características que se definen..”

Materias extrañas:

Donde dice: “...cualquiera materia...”, debe decir: “... cualquier materia...”.

Parásitos:

Apartado i), donde dice: “presencia de cualesquiera parásitos...”, debe decir: “presencia de cualquier parásito...”

Apartado ii), donde dice “>3mm o un parásito sin cápsula...”, debe decir: “>3 mm o un parásito no encapsulado...”

Olor y sabor:

Donde dice: “...sabores objetables...”, debe decir “... sabores extraños...”

Aceptación del lote:

En el apartado i) debe aclararse la referencia a la Sección 7, ya que al no estar numeradas las secciones en el texto, debería referirse a “Definiciones de Unidades Defectuosas”.

En el apartado iii) debería indicarse a que Norma se refieren los requisitos indicados en las secciones 3,4 y 5.

Microorganismos:

Donde dice: “ Tomando en cuenta...”, debe decir: “ Considerando ...”

SPAIN

(English version)

1. General Comments

The numbering of the various sections should follow the format of other Codex standards for fishery products.

2. Specific comments

Scope

Process Definition

Presentation

Raw Material

Spanish version only

Other ingredients

It should be specified that salt should comply with the requirements of the Codex Standard for Food Grade Salt (CODEX STAN 150-1985).

Foreign material

Spanish version only

Labelling – Net contents

Replace "interleaved with sheets of paper/other material.." with "interleaved with sheets of paper/other material suitable for contact with food..".

Storage instructions

Spanish version only

In addition, if the product has been thawed, the label should clearly indicate that the product is not fresh but frozen.

Determination of parasites

Definition of defectives

Foreign matter

Parasites

Odour and flavour

Spanish version only

Lot Acceptance

In point (i) the reference to section 7 should be clarified since sections are not numbered, so it should refer to "Definition of Defectives".

In point (iii) it should be clarified to which text belong the requirements specified in sections 3, 4 and 5

Microorganisms

Spanish version only

EUROPEAN COMMUNITY

Proposed Draft Standard for Smoked Fish CX/FFP 00/8

The European Community generally supports this document, but certain specific issues require more discussion. In particular the European Community suggests that:

1. In the scope the words "*similar transformed products*" are replaced by the words "*transformed products*".
2. Point b) of Description (list of species) is deleted because all cold smoked fish species should be covered by the standard.
3. The following point iv is add to the Section Hygiene and Handling:
"*iv Shall not be obviously infested with parasites. If a presence of live nematodes is detected, products must not be placed on market for human consumption*".
4. The following wording shall be inserted in the section Raw material:
"*in order to destroy the larvae of nematodes, the following species: herring, mackerel, sprat and wild salmon must be frozen at a temperature of equal to lower than -20°C for not less than 24 hours*".
5. In the Section on Definition of Defectives, the European Community proposes the following wording:
"*Parasites*
i) *The presence of ~~two or more~~ visible parasites.*"