CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda 3, 4, 5, 8 **FFP/34 CRD/13**

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

Thirty-fourth Session

Ålesund, Norway, 19 – 24 October 2015

COMMENTS OF KENYA

AGENDA ITEM 3 PROPOSED DRAFT CODE OF PRACTICE FOR PROCESSING OF FISH SAUCE

Example of a flow chart of fish sauce processing

GENERAL COMMENT

For the purpose of this proposed draft code of practice for processing of fish sauce, Kenya proposes that all the Potential hazards on different processing steps as per the flow chart to be classified into the three hazard categories as; physical, chemical and biological hazards for clarity.

SPECIFIC COMMENTS

8. Blending

Technical Guidance:

All utensils should be clean.

Comment:

We propose to add to bullet number three above, the word "and sanitized" at the end of the statement. The statement to read as follows*: All utensils should be clean and sanitized*.

9. Filtering

Technical Guidance:

• Filtering system should be cleaned **and sanitized** kept in an appropriate environment to prevent contamination.

• An appropriate filtering system should be checked regularly **serviced.**

Comment: we propose to add the words "and sanitized" in bullet one and the word "serviced" in bullet two

10. Storage

Technical Guidance*:*

• The storage tanks with lid should be **easy to** clean **and sanitized**, resistant to rust and salt, located in an appropriated area.

Comment: we propose to add the words " easy to' 'and sanitized" in bullet one. This is to prevent contamination during storage

11. Filling in containers

Potential hazards: **Chemical contaminants such as** residual chemical cleaning agent, physical contamination such as glass fragments.

Comment: we propose to add the words "Chemical contaminants such as' to the statement a bove for categorizing the potential hazards.

13. Labelling/packaging

Potential hazards: unlikely

Potential defects: incorrect labelling

Comment: *The labeling of the product should be in accordance to General Standard for the Labelling of Prepackaged Foods* (CODEX STAN 1-1985) and labelling provisions of the *Standard for Fish Sauce* (CODEX STAN 302-2011)

to prevent incorrect labeling.

Technical Guidance:

• Refer to Sections 8.2.3

16. Heating

Potential hazards: microbiological contamination

Potential defects: overheating and ***under heating***

Comment: *we propose to add the words 'and under heating' which can be as well a defect as over heating*

AGENDA ITEM 4 PROPOSED DRAFT CODE OF PRACTICE ON THE PROCESSING OF FRESH AND QUICK FROZEN RAW SCALLOP PRODUCTS

GENERAL COMMENT:

Para 7c. page two;

Whether the degree of complexity of the current flowchart warrants re-organization into two separate flowcharts - one for 'shucking on vessel' and another for 'shucking on land'. Use of separate flowcharts would trigger a subsequent re-organization of the guidance.

Comment:

Para 7c on page two mentioned above is one of the issues which was not reached consensus by the EWG. However we feel that the flow chart does not warrant reorganization into two separate flow charts. We propose that it be retained as it is for it adequately covers both "shucking on land" and "shucking on vessel"

SPECIFIC COMMENTS

X.1 IDENTIFICATION OF HAZARDS AND DEFECTS

X.1.1.1 Marine Biotoxins

Para 3

[Marine biotoxins are not reasonably likely to present a hazard in ~~in properly~~ **hygienically** processed commercial scallop adductor muscle meat shucked **from live Scallop**.~~]~~

COMMENT:

In para 3 under marine biotoxins, we propose to open both the opening and closing brackets and replace the word "properly" with "hygienically" and add at the end of the statement the phrase "from live scallop".

RATIONALE: The scallop meat is safe consumed when it's shucked live.

[Biotoxins may migrate into the adductor muscle (meat) if the viscera and roe are not removed while the scallop is alive.~~]~~

COMMENT:

In para 4 under marine biotoxins, We propose to open both the opening and closing brackets.

RATIONALE:

The marine biotoxins are less likely to migrate into the adductor muscles if the viscera and roe are removed when its alive.

[Toxins may accumulate at a hazardous level in the adductor muscle (in some species)**]**

Comment:

In para 5 under marine biotoxins; for clarity, We propose to request for more data and information needs to be provided by the EWG so that the country can respond to the bioaccumulation of toxins in all species.

[If there is information from monitoring of the harvesting area or from on-board biotoxin screening that toxins are present in the viscera/whole body analysis, control measures should be in place to confirm that scallop products are safe for human consumption (i.e. further testing of meat or roe-on scallops).**]**

COMMENT:

In para 6 under marine biotoxins, We propose to open both the opening and closing brackets.

RATIONALE:

Once information from monitoring of harvesting area or from on-board biotoxin screening that toxins are present, control measures should be in place to confirm the scallop products are safe for human consumption by increasing the sample size for further testing.

X.2.1.1 Scallop Landing/Deck Dump (Processing Step 1)

 Refer to Section 7.3 Harvesting and transportation of live bivalve molluscs of the Code of Practice for Fish and Fisheries Products.

 For at-sea shucking voyages**, [live]** scallops should be collected and placed in clean storage containers made from material that is easy to **clean, disinfect and non-corrosive,** ~~wash and disinfect and that is suitable for contact with seawater,~~ without undue delay and with care to avoid contamination.

Comment:

we accept bullet two above as is and therefore opened the opening and closing brackets on "live" and modify the statement above as indicated in bold .

Rationale:

we support the retention of the word alive within the statement to emphasise on the status of scallop before the processing stage.

 For short haul voyages **[**live**]** scallops should be collected and placed on deck or clean work surface to allow for washing of scallops. This should be carried out without undue delay and with care to avoid contamination.

Comment:

on bullet three mentioned above, we accept as is and therefore open the opened the opening and closing brackets on "live".

Rationale:

we support the retention of the word alive within the statement to emphasise on the status of scallop before the processing stage.

X.2.2 Shucking on land

This section covers the handling and storage of **[live]** ~~whole~~ scallops on board short haul harvesting vessels where shucking is done in the land based processing facility. The common steps for harvest vessel operations and subsequent land based processing for scallops shucked on land are shown in the right branch of the example flow diagram (Figure X.1).

Comment: we accept the brackets and therefore open the brackets that the scallops

AGENDA ITEM 5 PROPOSED DRAFT CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS (SECTION ON STURGEON CAVIAR)

SPECIFIC COMMENTS

X.1 Live fish reception

Potential Hazards: Microbiological and chemical contamination (e.g. oil pollutants, heavy metals, pesticides, drugs residue (e.g **use of hormones)**)

COMMENT: we propose the inclusion of use of hormones bracketed under drugs residues as a potential hazards during live fish reception processing step.

X.2 Slaughter (bleeding and washing)

Technical guidance:

- Suitable facilities for **hygienic and safe** waste disposal should be available in bleeding site.

Comment: we propose to add "hygienic and safe" on the bullet six (above) on technical guidance.

X.3 Belly cutting and ovary removal

Technical guidance:

Bullet 6 :Knives that are used for belly cutting should be distinct from those used for ovary **cutting to prevent cross contamination.**

Bullet 7: All equipment/utensils should be made of food grade materials, easy to clean, disinfect and non-corrosive

Comment: we propose modify bullet 6 and to add an additional bullet 7 to describe the material used for the equipment/utensils to read as… "all equipment/utensils should be made of food grade materials, easy to clean, disinfect and non-corrosive"

X.8: Treatment of eggs by shell improving methods

Technical guidance:

- ~~Shell texturizing agents are not permitted in accordance with Section 4 (Food Additives) of the Standard for Sturgeon Caviar (CODEX STAN 291-2010)~~

- Treatment of eggs by shell improving methods should occur in a manner that does not result in chemical or microbiological contamination and growth.

Comment: ***Bullet one and bullet two are contradicting each other and therefore we request more clarification on CODEX STAN 291:2010 regarding the texturizing agents usage.***

X. 17 Caviar packing

Technical guidance:

- During the exhausting process, the cans/jars should be kept clean from salt water that **drains** ~~**leaves**~~ **from** the cans/jars.

- The ~~**ambient temperature and**~~ duration of exposure to the ambient temperature should be controlled and monitored to minimize microbial growth by maintaining caviar temperature **at** ≤ 4ºC.

Comment: Bullet one above, delete "leaves" and then input "drains from" for clarity. Bullet two delete words "ambient temperature and" for clarity and addition of 'at"

X.20 Weighing and labelling

~~[~~Pasteurization treatment or a reference to pasteurization should be indicated on the label.~~]~~

Comment*: we accept the sentence the way it is and propose to open the brackets on the clause x.20 above.*

AGENDA ITEM 8 CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS (OPTIONAL FINAL PRODUCT REQUIREMENTS FOR COMMODITIES / APPENDIX ON MAP)

ANNEX 1 GOOD PROCESS CONTROLS ARE ESSENTIAL WHEN PACKING FILLETS AND SIMILAR PRODUCTS IN A MODIFIED ATMOSPHERE

Para 3

Determination of the shelf life of a particular product should be *by* ***a suitably qualified person such as a food technologist~~es~~ or microbiologist****.*

Comment on para 3 above: ***We propose the change of the clause above in for the term 'technologies" to "technologist"***

Para 4 on para 4 below

Seal integrity, "GMP and GHP should be adhered to;" of MA packs is a critical control point since it determines whether a MA pack is susceptible to external microbial contamination and air dilution of the gas mixture. Essential checks on heat sealing should include proper alignment of the sealing heads or jaws, dwell time, temperature, pressure and machine speed. Great care should be taken to ensure that the seal area is not contaminated with product, product drip or moisture since seal integrity may be reduced. In addition, the quality of the film used is important, particularly with regard to gas permeability, and only film with a clearly defined specification from reputable manufacturers should be used.

Comment: Addition of "GMP and GHP should be adhered to" to ensure no contamination occurs.

APPENDIX III OPTIONAL FINAL PRODUCT REQUIREMENTS2 - FRESH, FROZEN AND MINCED FISH

1.2 Quick Frozen Fish Fillets

Defect	Recommended Defect Description
k) Packaging Material	Each instance.
l) Viscera	Each instance of the internal organs

1.3 Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minces Fish Flesh

Defect		Recommended Defect Description
l)	Viscera	Each instance.
m)	Packaging Material	Each instance.~~]~~

Comment on k), i), l) and m) above:

1. **We agree to open the closing bracket on part 1.3 (m) above.**
2. **the term "Each instance" on part 1.2 and 1.3 that any part of an internal organ is found is a defect.**

APPENDIX IV OPTIONAL FINAL PRODUCT REQUIREMENTS - FROZEN SURIM

1. Primary Quality Attribute

1.1.1 Moisture

Moisture (%) = Pre-dry weight (g) - After-dry weight

Pre-dry weight**(g)**

Comment: Concerning the formula on the %tage moisture mentioned abovenwe propose that the final value should be multiplied by 100 to make it a percentage.

2.1.4 Crude Fat Content

Comment:

The specifications of the reagents for extraction of crude fat should be provided. I.e. the boiling point and residue points and the purity of the organic solvents to be used.

2.2.1.1 Water-added Surimi gel:

A. Comminution

Comment: we propose an overhaul of the "comminution" method above for clarity.

2.2.2.2 Expressible Moisture

Comment: the formulars in this section should be expressed in percentage by multiplying by 100.

APPENDIX V OPTIONAL FINAL PRODUCT REQUIREMENTS - COATED QF FISHERY PRODUCTS

Comment:

we propose the editing of column one within the table provided in this appendix to be as the "state of the product" rather than the "state of the product". As provided below.

(State ~~Type~~ of product, Frozen ~~state,~~ Thawed ~~state).~~

APPENDIX VIII OPTIONAL FINAL PRODUCT REQUIREMENTS – LOBSTERS AND CRABS (TO BE COMPLETED)

The following definitions are recommendations for use by purchasers or sellers of lobsters in designing specifications for final product. These specifications are optional and are in addition to the essential requirements prescribed in the appropriate Codex Product Standard.

Quick Frozen Lobsters

Defect	Recommended Defect Description
a) Appearance(i) Not easily separated without thawing when labelled as individually quick frozen.	***(ii) Colour ~~not generally uniform and non characteristic of the product, species and habitat or areas from which~~***

~~harvested~~

Comment: Colour not a defect since lobsters are multicolored for ii above.

(iii) In the case of products in the shell, the shell is not firm and is broken

b) Damaged Broken telson, cuts or scars penetrating the shell, crushed or cracked shell.

c) Soft Shell The shell is easily flexed by hand.

d) ~~Opacity~~ ~~The raw meat is not characteristically translucent. (% affected by weight)~~

Comment: opacity not a defect lobsters

e) Texture The meat of lobster, rock lobsters, spiny lobsters and slipper lobsters is ~~tough,~~ **soft** fibrous, mushy or gelatinous. (% affected by weight).

f) odour putrid-smell

Comment: we propose addition of bullet number f) on odour and its description as " putrid smell".

APPENDIX IX OPTIONAL FINAL PRODUCT REQUIREMENTS - SHRIMPS & PRAWNS A. FROZEN AND IQF PEEL AND DE-VEIN SHRIMPS OR PRAWN

QUALITY FACTOR

Determination of Grade

Black spots: The shell and/or meat of the shrimps or prawns should be ~~**absent**~~ **free** of black spots that affect the appearance.

Odour: Characteristic. ~~**Y**~~**iodoform** odour isn't considered a defect.

Comment: Editorial

Evaluation of flavour and odour:

For the evaluation of odour hold the shrimps or prawns close to the nose for evaluation. If the results of the raw odour evaluation indicate the existence of any off-odours, the sample shall be cooked ~~**to verify**~~ **and** the flavour and odour **verified.**

Examination for physical defects:

~~**Each of the**~~ shrimps or prawns in the sample should be examined for defects using the list of defect definitions.

Comment:

we propose the editing of column one within the tables provided in this appendix to be as the "state of the product" rather than the "state of the product". As provided below.

(State ~~Type~~ of product, Frozen ~~state,~~ Thawed ~~state).~~

APPENDIX XI OPTIONAL FINAL PRODUCT REQUIREMENTS - CANNED FISH

GENERAL COMMENT ON APPENDIX XI.

We propose the revision of the entire appendix to capture the real description of the defects accordingly and as per the other accompanying appendices in this document.