CODEX ALIMENTARIUS COMMISSION

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World Health Organization

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Agenda Item 4 **CX/FFP 15/34/5 Add.2**
Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS
Thirty-fourth Session
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19 – 24 October 2015
PROPOSED DRAFT CODE OF PRACTICE ON THE PROCESSING OF FRESH AND QUICKFROZEN RAW SCALLOP PRODUCTS
(Comments at Step 3)

Comments submitted by Australia, European Union and India

AUSTRALIA

General comments on the report (CX/FFP 15/34/5)

SUMMARY: Point 7

b. In the process of elaborating guidance relevant to short haul voyages, the eWG has acknowledged a degree of overlap occurring with Section 7 of the code (Live and raw Bivalve Molluscs). While cross references to Section 7 are indicated throughout, additional perspectives are welcome on whether the overlap is considered reasonable/ consistent, or whether there are areas where this overlap creates opportunity for confusion/inconsistency.

Comment: Australia believes that the overlap is reasonable. However, an improvement would be to make references to section 7 more specific to refer to the monitoring rather than classification of growing areas (i.e. a reference to 7.2.2 directly).

SUMMARY: Point 7

c. 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: Australia believes that the flowchart is complicated but usable. All required and relevant information is displayed for both scenarios however care will be required to interpret the data correctly.

Specific Comments on the Proposed Draft Code of Practice

X.1.1.1 Marine Biotoxins

Scientific data has shown that when algal blooms producing marine biotoxins[1] are present in harvest areas, toxins may accumulate at a hazardous level in the viscera and roe. Therefore, for roe-on scallop meat products, preventive measures should be in place in accordance with the *Standard for Live and Raw Bivalve Molluscs* (CODEX STAN 292-2008)

With respect to scallop meat products, marine biotoxins are not reasonably likely to present a hazard. While the hazard analysis will consider marine biotoxins a potential hazard, this hazard will be excluded or included based upon the species and the available country specific scientific evidence for toxins in that species. During shucking to produce scallop meat, incomplete removal of the viscera and roe may introduce biotoxin health hazards. If marine biotoxins are an identified hazard in the meat of the species then biotoxin control measures should be in place.

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

~~**[Biotoxins may migrate into the adductor muscle (meat) if the viscera and roe are not removed**~~

[1] Marine biotoxins: paralytic shellfish poisoning toxin (PSP); amnesic shellfish poisoning toxin (ASP); and diarrhetic shellfish poisoning toxin (DSP)

~~while the scallop is alive.]~~

~~[Toxins may accumulate at a hazardous level in the adductor muscle (in some 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 & Rationale: Australia suggests that the text in square brackets is not included. This is warranted because the first sentence is repeated in the text, the level of risk associated with second is unquantified and the third sentence is covered by the last sentence in the paragraph above.

X.2.3.1 Reception (shucked scallops) (Processing Step 8)

Potential Hazards: Marine biotoxins, microbiological, chemical and physical contamination

Potential Defects: Decomposition; excess water uptake; parasites; objectionable matter; foreign matter

Technical Guidance:

- Product specifications could include the following provisions:
  - organoleptic characteristics such as appearance, flavour, odour, texture, etc.;
  - species identification;
  - acceptable upper limit moisture content;
  - workmanship (e.g., presence of viscera/roe;
  - chemical contamination such as heavy metals, pesticide residues, etc.;
  - presence of foreign matter;
  - visible parasites.
- For receiving of roe-on scallop meat, a processor should have a process in place to ensure that the toxicity content meets the regulatory requirements of the official agency having jurisdiction over the harvest area. This could be accomplished by adhering to a toxin monitoring programs or end product testing. As per X.1.1.1 this consideration would also apply to scallop meat where the hazard analysis has determined that marine biotoxins are a hazard in the scallop meat. Refer to Section 7.2 Classification and monitoring of growing areas of the Code of Practice for Fish and Fisheries Products for further information on the classification and monitoring of growing areas.
- Scallop handlers and appropriate personnel should acquire skills in sensory and physical examination techniques to ensure incoming lots meet essential quality provisions of the Standard for Raw, Fresh and Quick Frozen Raw Scallop Products (under development).
- Appropriate procedures should be in place for scallop handlers and appropriate personnel to verify that specifications are met. This could include, but is not limited to, inspecting the product and reviewing product information in commercial documentation.
- ~~For the production of roe-on scallop meat, a processor should have a process in place to ensure that the toxicity content meets the regulatory requirements of the official agency having jurisdiction over the harvest area. This could be accomplished by adhering to a toxin monitoring programs or end product testing. As per X.1.1.1 this consideration would also apply to scallop meat where the hazard analysis has determined that marine biotoxins are a hazard in the scallop meat~~

Comment & Rationale: Australia suggests that the text for this section is amended as shown above. This is warranted because the information in this section is repeated in dot point 2 above (starting *'for receiving of roe-on scallop meat'*…)

EUROPEAN UNION

X.1.1.1 Marine Biotoxins

Scientific data has shown that when algal blooms producing marine biotoxins are present in harvest areas, toxins may accumulate at a hazardous level in the viscera and roe. Therefore, for roe-on scallop meat products, preventive measures should be in place in accordance with the Standard for Live and Raw Bivalve Molluscs (CODEX STAN 292-2008).

With respect to scallop meat products, marine biotoxins are not reasonably likely to present a hazard **in properly processed commercial scallop adductor muscle meat shucked live.** While the hazard analysis will consider marine biotoxins a potential hazard, **for instance during periods of high toxicity,** this hazard will be included based upon the species and the available country specific scientific evidence for toxins in that species. During shucking to produce scallop meat, incomplete removal of the viscera and roe may introduce biotoxin health hazards. If marine biotoxins are an identified hazard in the meat of the species then biotoxin control measures should be in place.

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

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

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

Reason:

The text as redrafted includes the information between brackets and is coherent with the Standard for Fresh and Quick Frozen Raw Scallop Products “Section 5 - Contaminants”.

The European Union and its Member States suggest deleting the square brackets in the last paragraph considering that the text as it stands adds clarity to the text above.

INDIA

Para 7:

b: In case of short haul voyages, overlap with Section 7 of the Code (Live and raw Bivalve Molluscs) does not create any inconsistency. However, short haul voyages must be properly defined and elaborated.

Figure X.1 Example of a flow chart for production of scallop products:

India feels that the flow chart is too complex. Separate flow chart with regard to whole scallop and shucked scallop (including roe-on scallops) as well as optional processing with phosphate addition should be prepared.

Rationale: Complexity of handling and operation as well as uncertainty of handling dead scallop in land operation leading to contamination of edible meat with biotoxins. Also the possibility of shucking dead scallops onboard fishing vessel as a fraudulent practice must be addressed.

X.1.1.1 Marine Biotoxins:

Square bracket 1, 2, 3:

Since, there is no evidence, the text included in these brackets seem to be unacceptable. Moreover, India would like to have scientific evidence on the low probability of migration of biotoxins to adductor muscle (meat) in scallops shucked live as the draft does not discuss about the possibility of shucking dead scallops on-board fishing vessel (where biotoxins might have migrated from the roe and viscera to the meat) and subsequently received by the processing establishments.

Square bracket 4: [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).]

India suggests that Scallop need to be harvested only from water free of Harmful Algal Bloom (HAB). If presence of HAB is noticed, then the produce should be harvested after closed period (**15 days**.)

X.2.1.2. Washing whole scallop/size grading (Processing Step 2)

Technical Guidance:

Bullet 4:

The text may be modified as under:

- Bullet 4: Washing should be carried out using pressurized clean sea water or salt water made from potable water. If salt water other than sea water is used it should be prepared from potable water and of 3% of food grade salt to minimize the uptake of moisture. The salinity of the salt water should be monitored. **Salt used should be of food grade and confined to Codex STAN 150-1985.**

X.2.1.3. Shucking (Processing Step 3, 21)

Technical Guidance:

India would like to add another bullet at the end with the following text:

- **As extensive handling is involved, the hygiene protocol should be in place for working environment**

Rationale: Environment is good source of microbial contamination.

X.2.3.2. Reception (Processing Step 20)

Technical Guidance:

Bullet 2: Whole scallops should be unloaded without undue delay and with care and adequately chilled to avoid microbiological contamination and decomposition.

The text may be modified as under:

Whole scallops should be unloaded without undue delay and with care and adequately chilled **(0-3 ^{0} C)** to avoid microbiological contamination and decomposition.

Rationale: The chilled temperature should be specified in the text..