

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 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 3.2

CX/FFP 24/36/3 Add.2

September 2024

ORIGINAL LANGUAGE ONLY

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

Thirty-sixth Session
Working by correspondence
7 – 11, 17 October 2024

Comments in reply to CL 2024/69-FFP

*Comments by Canada, Chile, Egypt, European Union, Iran,
Iraq, Norway, Peru, Philippines, Saudi Arabia, United Arab Emirates, USA*

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/69-FFP issued in September 2024. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
Canada would like to thank the EWG Chair and co-chairs. Canada agrees with the proposed amendment to include S. lemuru in Section 2.1 of CXS 94-1981.	Canada
Chile agradece la invitación a participar en el grupo de trabajo electrónico. Chile apoya el trabajo realizado en lo que se refiere a las conservas y preparados en sardinas.	Chile
<p>Egypt appreciates the work which was done in the document and proposes the following amendments.</p> <p>Egypt suggests to add the following item :</p> <p>1- adding new item (2.4) Packing media texts on :</p> <p>The canned sardine product shall be presented in one of the following packing media with or without permitted optional ingredients:</p> <ul style="list-style-type: none"> a) Own juice — Fish packaged without added liquid. b) Potable water — In conformity with the requirements of the Fish Inspection Regulations for water used in registered establishments. c) Spring water or mineral water — Potable water from an underground source but not obtained from a public community water supply and which meets the requirements of EAS 13. d) Vegetable broth — The liquid arising from the cooking of sound wholesome vegetables in water and which may be prepared from one or more types of vegetables. Vegetable broth may also be prepared from hydrolysed vegetable protein, but a broth so prepared requires that its components be declared in a list of ingredients. e) Olive oils — In conformity with CODEX STAN 33, Standard for olive oils and olive pomace oils or fish oils In conformity with CXS 329, Fish Oils f) Other vegetable oils — Clear, refined, deodorized, edible vegetable oil in conformity relevant East African Standards. g) Sauces — A thickened liquid made from acceptable food ingredients giving a characterizing flavor and odor to the product. h) Marinades — A thin liquid made from acceptable food ingredients, usually containing a sweetener, an acid solution or an alcoholic solution, with or without spices, herbs, seasonings, vegetables and other condiments. <p>2.5 Optional ingredients</p> <ul style="list-style-type: none"> a) Salt. <p>Salt shall be clean, free from foreign matter and foreign crystals, show no visible signs of contamination with dirt, oil, bilge or other extraneous materials and comply with the CXS150, Food Grade Salt</p> <ul style="list-style-type: none"> b) Natural starches. c) Other optional ingredients provided that all ingredients are suitable for human consumption, are free from abnormal taste, flavour or odour. Examples of such ingredients are spices, herbs, vegetable seasonings, vinegar and wine and vegetables and fruits for decorative and flavouring purposes only <p>2- regarding item 3.2 (other ingredients) Egypt suggests adding the following sentence: One or more of the following ingredients which are of food grade quality shall be used depending on type of presentation: edible oil, common salt, tomato ketchup, tomato puree, spices and condiments.</p>	Egypt

<p>The European Union (EU) would like to thank the Philippines, chair of the Electronic Working Work (EWG), for the efforts and work carried out to produce the report. It has been an honour for the EU to co-chair this EWG.</p> <p>The EU supports the inclusion of the candidate species <i>Sardinella lemuru</i> in Section 2.1, Product Definition, of the Standard for Canned Sardines and Sardine-Type Products (CXS 94- 1981).</p> <p>Rationale:</p> <ul style="list-style-type: none"> - A sensory evaluation has been carried out by designated laboratories following appropriate methods. The result of that assessment is favourable to the inclusion of the candidate species in the Codex Standard. - In terms of sustainability, the EU's goal is to ensure long-term sustainability for fisheries and aquaculture. The EU has encouraged through the Regional Fisheries Management Organisation's (RFMO) improved sustainability to their fisheries management and control systems. However, the species proposed in this instance is not included within the framework of these RFMOs and we do not have access to any source of information regarding the status of the stock. On the other hand, FAO confirmed that <i>S. lemuru</i> stocks could not be considered of particular concern compared to other species listed in the Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981). FAO also acknowledged the fisheries management plan adopted by the Philippines to ensure that stocks are exploited at their optimal biological potential. Hence, the EU has not got any additional comments to make concerning the sustainability of the species. 	<p>European Union</p>
<p>1-In "Process definition" section it is better to mention what types of containers are acceptable under this standard. 2- In section "Raw material" it is better to mention what criteria are used to determine if the fish are "sound" and fit for human consumption. 3- Adding a note about the importance of quality control checks to ensure compliance with these preparation requirements could be useful</p> <p>Head and gills shall be completely removed; scales and/or tail may be removed. The fish may be eviscerated. If eviscerated, it shall be practically free from visceral parts other than roe, milt or kidney. If ungutted, it shall be practically free from undigested feed or used feed.</p> <p>How visceral parts and roe, milt and kidney portions are distinguishable?</p> <p>Head and gills shall be completely removed; scales and/or tail may be removed. The fish may be eviscerated. If eviscerated, it shall be practically free from visceral parts other than roe, milt or kidney. If ungutted, it shall be practically free from undigested feed or used feed.</p> <p>The term "practically" in "practically free from" product definition is not technically clear. It is suggested acceptable limits or tolerances might be declared.</p>	<p>Iran</p>
<p>Agree with proposal</p>	<p>Iraq</p>
<p>Norway have no comments on the proposed amendment to the standard, and support the inclusion of <i>S. lemuru</i> in Section 2.1 of CXS 94-1981.</p>	<p>Norway</p>

<p>El Perú agradece al Comité del Codex sobre Comité del Codex sobre Pescado y Productos Pesqueros (CCFFP), presidido por Noruega, por el esfuerzo emprendido a la fecha y que se encuentran plasmados en la propuesta de enmienda anexado en el documento CX/FFP 24/36/3 Add.1 de la 36.a Reunión del Comité del Codex sobre Pescado y Productos Pesqueros (CCFFP), y en atención y respuesta al documento Carta Circular CL 2024/69-FFP (de Julio 2024) los miembros de la Comisión Técnica Nacional sobre Pescado y Productos Pesqueros, refieren que, se ha identificado la inclusión de la especie de sardina lemuru en el grupo de especies que pueden ser usados para preparar conservas entre otros productos análogos.</p> <p>De acuerdo a ello, es meritorio precisar que, para la inclusión de dicha especie, el país proponente “Filipinas” ha seguido los pasos que corresponden de acuerdo a lo descrito en las normas del Codex para el pescado y los productos pesqueros del Manual de Procedimiento; seguidamente, en base a los resultados obtenidos durante su evaluación, el Codex Internacional advierte que dicho país cumple con lo señalado en el citado manual, por ende, puede incluirse dicha especie en la NORMA PARA LAS SARDINAS Y PRODUCTOS ANÁLOGOS EN CONSERVA” - CXS 94-1981.</p> <p>Ante lo expuesto, la Autoridad Sanitaria en el marco de su competencia y el ámbito de sus funciones, además, de las coordinaciones realizadas en su momento con el grupo de trabajo formado con instituciones públicas y privadas del sector pesquero y acuícola, da su conformidad con respecto a la propuesta de enmienda a la norma para las sardinas y productos análogos en conserva (CXS 94-1981).</p>	Peru
<p>The Philippines supports the recommendation to amend the Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981) to include <i>Sardinella lemuru</i> (Bali Sardinella) in the list of <i>Sardinella</i> species outlined in Section 2.1, Product Definition.</p> <p>REASON As reflected in the CCFFP35 Sardine Species EWG report, <i>Sardinella lemuru</i> shares similar organoleptic properties with the other species listed in the standards, i.e., <i>S. aurita</i>, <i>S. maderensis</i>, and <i>S. pilchardus</i>. Additionally, data from the FAO indicate that <i>S. lemuru</i> stocks do not present sustainability concerns compared to the other species included in the list.</p>	Philippines
Saudi Arabia supports the proposed amendment to include <i>S. lemuru</i> in Section 2.1	Saudi Arabia
United Arab Emirates agrees with the proposed amendment to include <i>S. lemuru</i> in Section 2.1 of Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981).	United Arab Emirates
The United States appreciates the opportunity to provide comments on the proposed amendment of the Standard for Canned Sardines and Sardine-Type Products (CXS 94-1981). The United States supports the proposed amendment to include <i>S. lemuru</i> (Bali Sardinella) in the list of <i>Sardinella</i> species under Section 2.1 of CXS 94-1981.	USA