



Delegate Report, 32nd Session of the Codex Committee on Fish and Fishery Products (CCFFP)

October 1-5, 2012
Bali, Indonesia

The 32nd Session forwarded four items to the Codex Commission for adoption at Step 8 and 5/8:

- Draft Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish
- Draft Standard for Live Abalone and for Raw Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing;
- Proposed Draft Amendment to the Standard for Quick Frozen Fish Sticks
- Proposed Draft Revision of the Procedure for the Inclusion of Additional Species in Standards for Fish and Fishery Products

Items of particular importance to the United States included:

- The biotoxin and pathogen hazards in roe-on scallops that differ from scallop meat.
- The inclusion in the Bivalve Standard of functional bioassays for biotoxin analysis.
- The inappropriate use of hormones in the production of caviar.
- The use of histamine in fish as an indicator of decomposition.

The Report of the session can be found in REP13/FFP on the Codex website, www.codexalimentarius.org. The United States was represented by the U.S. delegates, Bill Jones, FDA, Office of Food Safety, and Timothy Hansen, USDC, Seafood Inspection Program. The following is a brief discussion of key topics.

Draft Standard for Quick Frozen Scallop Adductor Muscle Meat

The U.S. did not support the inclusion of roe-on scallops in this Standard because scallop roe has pathogen and biotoxin hazards not found in scallop meat. The U.S. proposed a compromise that allowed inclusion of roe-on scallops with clear differentiation of their special hazards. (CRD

18: ftp://ftp.fao.org/codex/meetings/CCFFP/CCFFP32/CRDs/fp32_CRD18e.pdf)

The committee revised the Standard along the lines of CRD 18; however, the United States will continue to oppose some of the provisions that were included:

- Scallop products with only added water (no phosphates) were included in the Standard as these products are apparently produced in the United Kingdom and Japan. The U.S. does not recognize any technological purpose for adding only water, other than to increase net weight, which is not permitted in the U.S.
- Guidelines for viruses and *Vibrio* were applied to both roe-on scallops and to scallop meat; however, they should not be applied to scallop meat because the meat does not have these hazards.
- The Standard requires labeling the percentage scallop meat and the percentage added solution for products processed with added phosphate solutions. In the U.S., only the percentage solution is required on the label. The Committee agreed to return the Draft Standard to Step 6 for comments and consideration by the next session.

Proposed Draft Code of Practice on the Processing of Scallop Meat

A pre-session working group made progress on the Code of Practice led by the detailed comments offered by the United States (CRD 2: ftp://ftp.fao.org/codex/meetings/CCFFP/CCFFP32/CRDs/fp32_CRD02e.pdf). It was decided to continue work on aligning the document with the Draft Scallop Standard and to develop a definition for viscera (a topic of considerable debate) in an intersession Electronic Working Group led by Canada. The document was returned to Step 2/3 for editing and comments for consideration at the next Session.

Proposed Draft Performance Criteria for Reference and Confirmatory Methods for Marine Biotoxins in the Standard for Raw and Live Bivalve Molluscs



The U.S. did not support advancement of the draft because of errors and shortcomings, including the exclusion of functional-based methods such as the widely used mouse bioassay for paralytic shellfish poison (PSP). The U.S. submitted comments along with a revised draft. The Committee agreed that the U.S. proposal (CX/FFP 12/32/7, Appendix I, ftp://ftp.fao.org/codex/meetings/CCFFP/CCFFP32/fp32_07e.pdf) was better aligned with the *Codex Procedural Manual* and agreed to use it as the basis for an in-session working group led by the U.S.

Prior to the Session, the U.S. had agreed in principle with Canada, Australia, and New Zealand on a stripped-down version of the U.S. proposal, and this version emerged from the in-session Working Group. The revised proposal does not include the important procedures for estimating multi-analog method conformance with the performance criteria, but does allow the continued use of the mouse bioassay for determining compliance with the Bivalve Standard.

Some countries consider the agreed provision only temporary until the HPLC method for PSP is further refined and the allowed use of the mouse bioassay is rescinded in line with national legislation in those countries. The U.S. believes that the mouse bioassay for PSP should continue to be included because it is the only method that can be practically used by all Codex members, has over 60 years of successful use, and is the definitive method used to establish the current maximum limit. Some issues remaining with HPLC methods include high cost, longer turnaround times, need for agreement on toxicity equivalent factors, and lack of certified reference standards.

The Committee agreed to forward the Proposed Biotoxin Criteria to the Codex Commission for adoption at Step 5. The committee also agreed to discontinue work on the Proposed Draft Performance Criteria for Screening Methods for Marine Biotoxins in the Standard for Raw and Live Bivalve Molluscs because the intent of the document—to list the mouse bioassay as a screening method—was no longer a concern as it will be an allowed reference method in the Bivalve Standard.

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

The U.S. objected to the inclusion of the production step entitled, "Laying induction by injection of hormones." Hormone use in caviar is considered a potential health hazard, and the United States believes that its inclusion in the Code will be misleading. In addition, the United States seeks removal of the production step entitled, "Eggs treatment with shell improving agents" because these texture improving agents have not been identified and are specifically disallowed in the Caviar Standard. The document uses the language, "as approved by the competent authority," in order to address the above issues, but this language is inappropriate in a Codex document designed to achieve international harmonization. The committee agreed to return the document to Step 2/3 for redrafting by an electronic working group led by Iran.

FAO presentation of the conclusions of the *Joint FAO/WHO Expert Meeting on the Public Health Risks of Histamine and other Biogenic Amines from Fish and Fishery Products* .

The Expert Meeting agreed that a dose of 50 mg of histamine was the no-observed-adverse-effect-level (NOAEL) for healthy adults. Assuming a serving size of 250 g, the NOAEL in fish would be 200 mg/kg of fish. The Expert Report makes no specific recommendation for safety limits for histamine. The NOAEL is a reference point for determining a safety limit in fish, and does not include the usual 10X safety factor for sensitive persons and other variables. This will be a consideration of an electronic working group chaired by Japan and the United States that will review the Expert Report and make any recommendations related to fish and fishery product standards and further work.

The U.S. and another country objected to an implication in the CCFFP Session Report that the Expert Report concluded that histamine is not a reliable indicator of histamine. Some countries question the current histamine provisions for decomposition in Codex fish standards. The contention that histamine is not a reliable indicator of decomposition is technically incorrect because histamine is a result of bacterial breakdown of protein (decomposition). Only certain species of fish produce histamine, and other kinds of decomposition can occur without the formation of histamine; however, whenever elevated histamine is present, temperature abuse and decomposition have always occurred. The Expert Committee reviewed the health impacts of histamine, but not its use as an indicator of decomposition. The U.S. strongly supports retaining histamine as an indicator of decomposition in Fish Standards, and considers this one of the most important issues for the electronic working group and the next CCFFP session.

Amendment to the Standard for Quick Frozen Fish Sticks (Nitrogen Factor for South Atlantic Hake):



The U.S. did not support the proposed nitrogen factor for South Atlantic Hake because it is based on fish blocks rather than fresh whole fish and is not comparable to the other nitrogen factors in the Standard. Added water usually found in minced fish blocks was the reason that the nitrogen method for determining fish content was proposed; therefore, it is inappropriate to use minced fish blocks with added water as the basis for determining nitrogen factors in the Standard. South Africa indicated that the nitrogen factor for Cod was partially derived from frozen blocks; therefore, the Committee decided to list two different nitrogen factors for South Atlantic Hake, one for fillet and one for mince, and to advance the amendment to Step 8, omitting Steps 6 and 7.

The U.S. does not support the nitrogen method. The listed nitrogen factors for different species are not significantly different due to wide variance caused by reproductive cycle, habitat, culture methods, and testing methodology. Most of the nitrogen factors are set 8% below the average level found in the fish, and the Fish Stick Standard gives an additional 10% leeway. Combined, this brings into question the listed nitrogen factors and the usefulness of the method for determining fish content.

The U.S. supports the official Codex method for determining percentage fish flesh (AOAC gravimetric scrape method). The Committee previously agreed on an allowed variance for the official AOAC method of 2% for raw breaded and 4% for precooked breaded fish, which was not incorporated into the Standard.

The Committee agreed that the U.S., U.K. and New Zealand would prepare a discussion paper to address the usefulness of nitrogen factors and the need to review the list of existing nitrogen factors.

Other Matters

Draft Standard for Fresh/Live and Frozen Abalone (Haliotis spp): Corrections were made to the statistical calculations for acceptance/rejection based on defective sample units. It was determined that antioxidants are only used in canned abalone, which is not covered by the Standard, and, therefore, additives are not permitted in any products covered by the Standard. It was determined that diarrhetic shellfish poison (DSP) can accumulate in abalone meat, and The Committee agreed to remove the provision that the biotoxin hazard does not apply to abalone that have the viscera and epithelium removed. The Standard was advanced to Step 8 for adoption by the Commission.

Proposed Draft Revision of the Procedure for the Inclusion of Additional Species in Standards for Fish and Fishery Products (for inclusion in the Codex Procedural Manual): The U.S. did not take a position on this document, but questioned the need for an overly complex procedure that could pose a barrier to trade. The Committee made some modifications to increase flexibility; however, the new procedure is more burdensome than the previously adopted procedure. The Committee advanced the proposed draft revision to the Commission for adoption at Step 5/8 with the recommendation to omit Steps 6&7.

Food additive provisions for the Draft Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish: The Committee established an in-session working group, chaired by the United States, to finalize the additive provisions for the Smoked Fish Standard based on the proposal from the inter-session electronic working group, (CX/FFP 12/32/3, Appendix). The in-session working group proposed additive provisions and justifications that were discussed and modified by the Committee (CRD 24: http://ftp.fao.org/codex/meetings/CCFFP/CCFFP32/CRDs/fp32_CRD24e.pdf). The Committee could not agree on the provisions for Brilliant Blue FCF, Caramel 1-plain caramel or sodium nitrite. These provisions were returned to Step 6 for further consideration. The Committee agreed to propose to the Codex Committee on Food Additives the insertion of notes identifying the additives listed in the GSFA under food category 09.25 that are not allowed in products covered by the Smoked Fish Standard. The Committee agreed to move the Standard to Step 8 for adoption by the Commission.

Proposed Food Additive Provisions in Standards for Fish and Fishery Products: The Committee agreed to form an electronic working group chaired by the European Union and the United States to consider proposals for food additive provisions in the standards for fish and fishery products.

Criteria for Salmonella in the Standard for live and Raw Bivalve Molluscs: Based on a proposal from the Codex Committee on Food Hygiene, the CCFFP agreed to remove the criteria for *Salmonella* in the *Standard for Live and Raw Bivalve Molluscs*, and to include wording in the *Code of Practice for Fish and Fishery Products* allowing the implementation of salmonella criteria if warranted through environmental monitoring.



United States Department of Agriculture