

Codex Updates (October 2017 – March 2018)

The number of correspondence items from the horizontal Codex Committees between 1 October 2017 and 31 March 2018, and those of relevance to the seafood industry are shown in Figure 1.

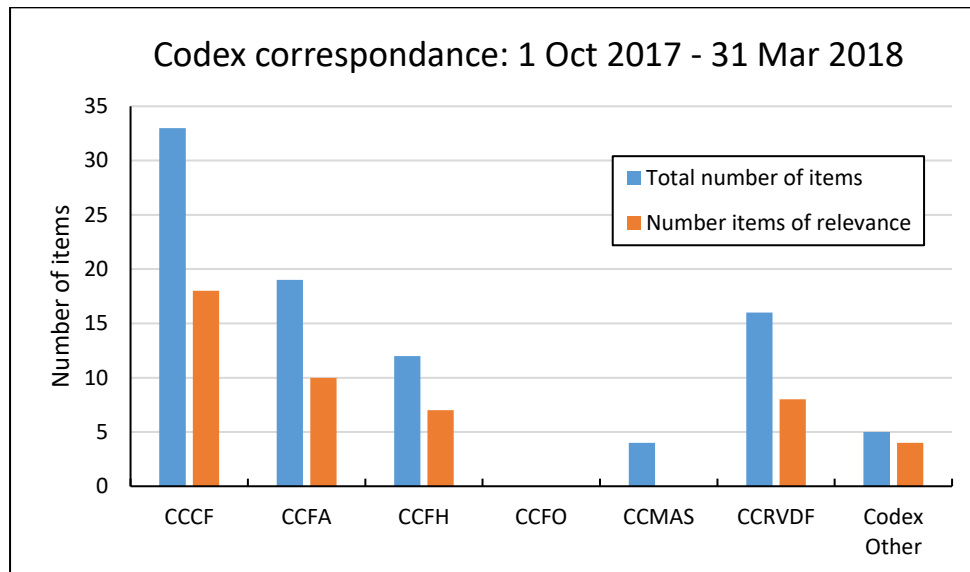


Figure 1 Codex correspondence: 01 October 2017 – 31 March 2018

The pertinent Codex activities that relate to seafood include:

- [Ciguatera – Call for experts and data](#)
- [Methylmercury – Update on establishing maximum levels \(ML\) in fish species](#)
- [Travel Report to CCFH49](#)
- [Histamine - Update on control guidance](#)
- [Food Hygiene – Revision to the Recommended Code of Practice](#)
- [Lead – Review of maximum levels \(MLs\) in foods](#)
- [Non Dioxin-like PCBs – Revision to cover non dioxin-like PCBs in food and feed](#)
- [MRLs in Seafood – Grouping Fish Species](#)
- [Alignment of Food Additives – Notification of changes to a variety of seafood products](#)

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Ciguatera – Call for experts and data

Following the request from the 11th Session of the Codex Committee on Contaminants in Food (CCCF11), the Joint FAO/WHO Expert Committee for Food Additives (JECFA) has called for scientific data on ciguatera including occurrence and chemical data, toxicological, epidemiological and clinical data, exposure assessment data, and risk management measures. JECFA also called for experts in the field to develop scientific advice.

SafeFish has initiated an Australian working group to respond to the call for data. Data must be supplied to JECFA by 1 May 2018.

Methylmercury – Update on establishing maximum levels (ML) in fish species

In early January 2018 SafeFish provided comments to Codex Australia on the draft report for the proposed maximum levels for methylmercury in fish. Due to an insufficient timeframe SafeFish could not engage with industry or adequately interrogate the data. Later in January SafeFish notified its communication list (225 industry, researcher and regulator contacts) on the proposed changes and called for industry engagement and involvement in developing future SafeFish responses. Limited responses were received.

In February 2018 SafeFish updated key industry sectors on the developments and highlighted some issues that were likely to be raised during the 12th Session of the Codex Committee on Contaminants in Food (CCCF12). SafeFish discussed a number of these issues with the Australian lead delegate to CCCF12 and submitted a response to Codex Australia. SafeFish continued to advise that a risk-benefit approach should have been used when establishing the MLs for methylmercury, and that it would like to see CCCF request new work be undertaken to consider the risk-benefit approach.

CCCF12 was held in The Netherlands on 12-16 March 2018. A copy of the Draft Report from the meeting is available from SafeFish or can be accessed on the CCCF12 meeting website. At the meeting **CCCF agreed on the proposed draft Codex MLs for methylmercury in tuna, alfonsino, marlin and shark (see Table 1 for details). The proposed MLs will be advanced for adoption at the 41st Session of the Codex Alimentarius Commission (CAC41).**

Table 1 Proposed draft Codex MLs for methylmercury in selected fish species

Commodity /Product Name	Maximum Level (ML) (mg/kg)	Portion of the Commodity/Product to which the ML applies	Notes/Remarks
Tuna	1.2	Whole fresh or Frozen	Countries or importers may decide to use their own screening when applying the ML for methylmercury in fish by analysing total mercury in fish. If the total mercury concentration is below or equal to the ML for methylmercury, no further testing is required and the sample is determined to be compliant with the ML. If the total mercury concentration is above the ML for methylmercury, follow-up testing shall be conducted to determine if the
Alfonsino	1.5		
Marlin	1.7		

Shark	1.6		<p>methylmercury concentration is above the ML.</p> <p>The ML also applies to fresh or frozen fish intended for further processing.</p> <p>Countries should consider developing nationally relevant consumer advice for women of childbearing age and young children to supplement the ML.</p>
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The EU, Switzerland and Norway expressed their reservation at these proposed Codex MLs for methylmercury as they are higher than their current limits for total mercury. The Commission Regulation (EC) No. 1881/2006 sets a ML for total mercury of 0.5 mg/kg for most fish and fishery products, with the exception of a number of species including tunas, marlin and sharks, for which the ML for total mercury is 1.0 mg/kg.

The proposed Codex MLs for methylmercury are also generally higher than what is currently prescribed in the Australia New Zealand Food Standards Code for total mercury. The Australia New Zealand Food Standards Code specifies a variety of mean levels and maximum levels for total mercury in fish and fishery products, which are dependent on fish species and sampling plan.

CCCF also agreed to discontinue the development of MLs for kingfish/amberjack (new data indicated low mean methylmercury levels) and swordfish (no consensus could be reached on a suitable ML).

CCCF agreed to send the sampling plan to CCMAS for endorsement and have requested advice from CCMAS on performance criteria, the variability of methylmercury within lots of fish and the portion of fish to be sampled.

A discussion paper will be developed by New Zealand and Canada to consider the establishment of MLs for additional fish species.

[Travel Report to CCFH49](#)

Stephen Pahl travelled to Chicago, USA in November 2017 and provided technical input and support to the Australian delegation during the 49th Session of the Codex Committee on Food Hygiene. The pertinent issues related to seafood was the development of the histamine control guidance and the revision of the General Principles of Food Hygiene. More details below and a copy of the travel report will be uploaded on the SafeFish website.

[Histamine - Update on control guidance](#)

At the 49th Session of the Codex Committee on Food Hygiene (CCFH49) the guidance on the control of histamine in fish was modified to improve flexibility, clarity and consistency. Significant discussions were held on reference to typical histamine levels in freshly harvested scombrototoxin forming fish, achievable histamine levels by applying HACCP (hazard analysis and critical control points), requirement for on-board HACCP, and if Salmonidae should be included or excluded from the list of at-risk species.

- No agreement could be reached by CCFH on specifying histamine levels in freshly harvested scombrototoxin forming fish and achievable histamine levels by applying HACCP. Concerns were

raised that if levels were stated in the guidance document then these could become de-facto limits. It would also depend on where in the supply chain fish were taken for assessment. As a result the guidance document refers to levels published in an FAO/WHO Expert Report.

- The Committee agreed that harvest vessel operations are primary production and do not need to apply HACCP principles, as GMP is sufficient to control histamine. However if a fishing vessel operation has not implemented a histamine control system including monitoring and record keeping that provides document evidence of control, then histamine testing becomes a CCP (critical control point) for the receiver.
- **No consensus could be reached by the Committee regarding the inclusion or exclusion of Salmonidae, and as a compromise the Committee agreed to list the six families (i.e. Scombridae, Clupeidae, Engraulidae, Coryphaenidae, Pomatomidae, Scomberesocidae)** that are already referenced in *Code of Practice for Fish and Fishery Products* that are considered to present the greatest potential for developing hazardous levels of histamine. Morocco and Mauritania expressed their reservation to the non-inclusion of Salmonidae. It was also noted by the Committee that the list could be expanded in future.

The guidance document provides information on what can be done to manage the potential of histamine production over the entire supply chain. This includes **establishing time limits from death of fish to chilling, monitoring methods, record keeping and making record available to receiving establishments. If histamine control records are not available to the receiving establishment, then the receiving establishment should perform histamine testing on each vessel delivery to monitor and to document that the histamine levels in the raw material received are acceptable.**

The Committee agreed to advance the guidance for the control of histamine for adoption at the 41st Session of the Codex Alimentarius Commission and noted that the guidance would be published only once consequential alignments to the relevant sections of the *Code of Practices for Fish and Fishery Products* were finalised.

Food Hygiene – Revision to the Recommended Code of Practice

The Codex Committee on Food Hygiene (CCFH) have been working on a revision to the Recommended Code of Practice *General Principles of Food Hygiene* (CAC/RCP 1-1969) which is applicable to all stages of the food chain.

At the 49th Session of CCFH (CCFH49) the discussions focussed on the fundamental principles rather than detailed discussions on the text. **The Committee agreed to accelerate progress with the aim of delivering a final draft to the 50th Session of CCFH.** There is likely to be a significant restructure to the document and a number of other changes including stipulating if all food businesses should complete a hazard analysis.

No further information has been made available at this time.

Lead – Review of maximum levels (MLs) in foods

CCCF are continuing to review existing and establish new MLs for lead. In 2017 an electronic working group prepared a discussion paper to establish a structured approach to prioritise commodities not contained within the General Standard for Contaminants and Toxins in Food and Feed.

In November 2017 SafeFish notified 111 industry members of the proposal. Only one comment was received from industry and this related to potential impacts for products sold on the domestic market. In November 2017 SafeFish also submitted a response to Codex Australia on the 1st draft

discussion paper. This response outlined a need to consider to what extent these categories contribute to total lead exposure.

In December 2017 SafeFish submitted a second response to Codex Australia on the 2nd draft discussion paper and noted that **processed fish has moved from an 'intermediate' to a 'high' priority.**

In March 2018 at CCCF12, the Committee noted the need to take exposure data into account when establishing priorities as occurrence and trade data alone did not fully capture those commodities with high contribution to the exposure. Brazil will lead an electronic working group to develop a revised discussion paper for CCCF13. **JECFA will publish a call for occurrence data for lead in the priority commodities.**

Non Dioxin-like PCBs – Revision to cover non dioxin-like PCBs in food and feed

CCCF12 agreed that non dioxin-like PCBs be included in the *Code of Practice for the Prevention and Reduction of Dioxin and Dioxin-like PCB Contamination in Food and Feeds* (CAC/RCP 62-2006). The practices of reducing the presence of non-dioxin-like PCBs are similar to that of dioxin-like PCBs. **A proposed Code of Practice for the Prevention and Reduction of dioxins, and dioxin-like PCBs and non dioxin-like PCB contaminations in food and Feed will be advanced for adoption** at the 41st Session of the Codex Alimentarius Commission.

MRLs in Seafood – Grouping Fish Species

The Codex Committee on Residues of Veterinary Drugs in Food (CCRVDF) have prepared a discussion paper that considers:

- the possibility of grouping fish for establishment of MRLs
- a database and potential prioritisation approaches for ranking veterinary drugs to enable future JECFA (Joint FAO/WHO Expert Committee on Food Additives) evaluation.

In November 2017 SafeFish sought recommendations to find people with the right expertise in this area. In March 2018 SafeFish notified aquaculture industry associations and the Australian Pesticides and Veterinary Medicines Authority of the proposal and requested feedback if there were any comments or issues that they wanted SafeFish to raise. No feedback was received on the issue.

The main reason for grouping fish is to reduce resources necessary for MRL evaluation whilst maintaining public health protection. **There is potential that fish may be grouped according to phylogeny, common physiology, common behaviour, temperature, salinity etc., or MRLs could be extrapolated using a conservative approach.**

Alignment of Food Additives – Notification of changes to a variety of seafood products

Codex Committee on Food Additives (CCFA) have continued the process of aligning the remaining nine seafood commodity standards to the *General Standard for Food Additives* (CODEX STAN 192-1995). This follows recent alignment of other fresh and frozen seafood commodity standards.

The list of approved food additives and maximum permitted level within the individual commodity standards will be replaced with reference to **permissions listed within the General Standard for Food Additives (CODEX STAN 192-1995).**