

**SafeFish Technical Expert Report of the
Codex Committee on Fish and Fishery Products
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SafeFish Delegate:

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Executive Summary

Successful outcomes for the Australian seafood industry were achieved at the 33rd Session of the Codex Committee on Fish and Fish Products. These outcomes were supported by active contribution by SafeFish and Australian seafood industry representatives, particularly on key items such as the biotoxin testing methodology criteria and the Scallop Standard. Continued involvement by SafeFish and engagement by Australian seafood industry representatives will be important if Australia is to continue to play a lead role in the development of international fish and fishery product standards.

For Australia, highlights from the 33rd Session included:

- leading an in-session working group on the draft performance criteria of biotoxins (for which the position of participating countries was divided) which resulted in work being progressed to Step 8 for adoption and endorsement by the Codex Committee on Methods of Analysis and Sampling (CCMAS); and
- adoption of positions within the Standard for Fresh and Quick Frozen Raw Scallop Products such that the Australian production system was better reflected, and commitment to consider the Australian production system when progressing the draft Code of Practice on Scallop Meat.

In preparation for the 34th Session, SafeFish should continue to provide technical input from research experts and representatives of the Australian seafood industry. Effort should continue to be directed towards active participation in relevant working groups, including the working groups on the scallop code of practice and histamine, and to the provision of sound, scientifically justified written comments on draft documents.

Matters referred to the Commission and other Committees:

Agenda Item	Commission / Committee	Reason for referral
Matters Referred – Sampling Plans for the Standard for Live Abalone and Raw, Fresh Chilled or Frozen Abalone for Direct Consumption of For Further Processing and the Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke Dried Fish	CCMAS	Request guidance on what is expected from CCFFP to include sampling plans for quality parameters or request CCMAS to provide proposed sampling plans for consideration by CCFFP. Request will also apply to the draft Standard for Fresh and Raw Quick Frozen Scallop Products.
Draft Performance Criteria for Reference and Confirmatory Methods of Marine Biotoxins (Section I-8.6 Determination of Biotoxins) in the Standard for Live and Raw Bivalve Molluscs.	Commission	Adoption at Step 8
	CCMAS	Endorsement at Step 8
Standard for Smoke Fish, Smoke-Flavoured Fish and Smoke-dried Fish (Section 4 – Food Additives)	CCFA	Inform CCFA of CCFFP decision in reply to comments made in the endorsement process regarding tartrates, dextrin roasted starch, polyoxyethylene (20) sodium monooleate, sodium erythrobate. Request removal of Brilliant Blue from the GSFA for use in smoked fish.
Draft Standard for Fresh and Raw Quick Frozen Scallop Products	CCFA	Inform CCFA that phosphates are widely used and technologically justified for quick frozen products. Endorsement at Step 8
	CCMAS	Request guidance on what is expected from CCFFP to include sampling plans for quality parameters or request CCMAS to provide proposed sampling plans for consideration by CCFFP.
	CCFL	Endorsement at Step 8
	Commission	Adoption at Step 8
Proposed Draft Code of Practice for Processing of Fish Sauce	Commission	Adoption at Step 5
Proposed Food Additive Provisions in Standards for Fish and Fishery Products (Food Additive Provisions in Adopted Standards)	CCFA	Forward a revised list of additives in the Standards below for endorsement <ul style="list-style-type: none"> - General Standard for Quick Frozen Fish Fillets - Standard for Quick Frozen Blocks of Fish Fillets, Minced Fish Flesh and Mixtures of Fillets and Minced Fish Flesh - Standard for Quick Frozen Lobsters - Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter - Standard for Quick Frozen Shrimps of Prawns

Summary of recommended future work for SafeFish:*(See report below for context)*

Agenda Item	Stage	Recommended Actions for SafeFish
Draft Performance Criteria for Reference and Confirmatory Methods for Marine Biotoxins (Section I-8.6 Determination of Biotoxins) in the Standard for Live and Raw Bivalve molluscs	37CAC (adoption Step 8)	N/A – pending endorsement.
Draft Standard for Smoked Fish, Smoke-flavoured Fish and Smoke-dried Fish – Section 4 _Food Additives	37 CAC (adoption Step 8)	N/A –pending endorsement
Draft Standard for Fresh and Quick Frozen Raw Scallop Products	37CAC (adoption Step 8)	N/A – pending endorsement
Proposed Draft Code of Practice on the Processing of Scallop Meat	34CCFFP (Step 3) eWG	Actively participate in eWG and provide written comment for 34CCFFP
Proposed Draft Code of Practice for Fish and Fishery Products (Section on Sturgeon Caviar)	34CCFFP (Step 3) eWG	Low priority, monitor development and provide written comment for 34CCFFP if required
Proposed Draft Code of Practice for Processing of Fish Sauce	37CAC (adoption Step 5) 34CCFFP (Step 5)	Low priority, consider draft CoP and provide written comment for 34CCFFP if required.
Proposed Food Additive Provisions in Standards for Fish and Fishery Products	34CCFFP eWG	Participate in eWG, particularly note developments around sulphites and provide written comment for 34CCFFP
Discussion paper on Histamine	34CCFFP eWG	Actively participate in eWG and provide written comment for 34CCFFP if required
Discussion Paper on Nitrogen Factors	34CCFFP	Low priority, consider discussion paper and revised Section 7.4 of the Standard and provide written comment for 34CCFFP if required
Code of Practice for Fish and Fishery Products (Optional Final Product Requirements For Commodities)	34CCFFP	Consider circular letter inviting proposals for sections to be integrated into the Code and provide written comment for 34CCFFP if required
Proposed new work – Standard for Fresh Chilled Pirarucu	34CCFFP	Low priority, consider project document (to be developed by Columbia) and provide written comment for 34CCFFP if required

Agenda Item 2a - Matters Referred

1. Food Additives & Biotxin Criteria

Associated CRD(s) – 2, 13

Discussion on the items relating to food additives and biotoxin criteria was deferred for discussion under the relevant agenda item.

Sampling plans

The Committee was uncertain about the request from CCMAS in relation to sampling plans for the Abalone Standard and the Smoked Fish Standard. The committee agreed to request guidance from CCMAS on what is expected from CCFFP in relation to including sampling plans for quality parameters, or request CCMAS to provide proposed sampling plans for consideration by CCFFP. This request will also apply to the draft Standard for Fresh and Raw Quick Frozen Scallop Products.

Recommended actions for SafeFish:

Nil

Agenda Item 2b - Matters Arising from the Work of FAO and WHO

Associated CRD(s) – 2

Information was presented and noted by the Committee.

Recommended actions for SafeFish:

Nil

Agenda Item 2c - Matters Arising from the OIE

Associated CRD(s) – 2

Information was presented and noted by the Committee.

Recommended actions for SafeFish:

Nil

Agenda Item 3 - Draft Performance Criteria for Reference and Confirmatory Methods for Marine Biotoxins (Section I-8.8 Determination of Biotoxins) in the Standard for Live and Raw Bivalve Molluscs

Associated CRD(s) – 3, 14, 20

This was a key agenda item for SafeFish and was preceded by an in-session working group, chaired by Australia (CRD 20 refers). At the beginning of the session, the progression of this document Step 8 for adoption by the Commission and endorsement by CCMAS was considered to be most unlikely, with many delegations believing that the Committee had hit a stalemate and that work could not be progressed.

The CCFFP chair met with the Australian delegation prior to the plenary and discussed the potential option of taking the Australian position forward, with allowance for functional assays as well. This recommendation was further supported by the fact that CCMAS was actively discussing the issue of functional and chemical methods, and had not yet landed on a set position. Furthermore, previous CCFFP meetings had shown that all countries could support a compromise that allowed both functional and chemical methods to be included in the Standard, if the correct wording could be found.

The in-session working group agreed to follow this path, and the result was the development of criteria for both chemical and functional assays. Determination of chemical criteria for individual saxitoxin analogs followed the procedural manual, with text inserted to explain how total toxicity was determined following quantification of analogs. The initial proposal put forward by the US during the in-session working group was to attempt to use criteria similar to that of chemical methods to describe the functional assays, however it was widely agreed that this was not appropriate. As such the final proposal, which was supported by the Committee, listed the mouse bioassay or equivalent tests as appropriate methods.

Recommended actions for SafeFish:

Provide additional technical support to Australian delegation if/when requested.

Agenda Item 4 – Standard for Smoked Fish, Smoked Flavoured Fish and Smoke-Dried Fish – Section on Food additives

Associated CRD(s) – 4

The Committee considered the recommendations of the CCFA and developed a position based on consideration of technological justification. While the delegation of the US pushed for continued acceptance of Sodium Nitrate, consensus was achieved in relation to not allowing sodium nitrate based on consumer safety concerns and noting that alternative measures were available to address the technological need of *Clostridium botulinum* control as advocated by the US.

Recommended actions for SafeFish:

Nil

Agenda Item 5 – Draft Standard for Raw, Fresh and Quick Frozen Scallop Products

Associated CRD(s) – 5, 11

This was a key agenda item for SafeFish.

Following extensive and successful progress during the session, this Standard was progressed to Step 8 for adoption by the Commission, and endorsement at Step 8 by CCFL and CCFA. The section on sampling plans is to be referred to CCMAS for advice.

SafeFish's proposals in relation to introducing a generic description for the product types combined, and the removal of section 6.2 were supported. The main points of contention during the session related to labeling of product with added water and parasite provisions.

Recommended actions for SafeFish:

SafeFish to actively participate in the eWG and provide written comment for CCFFP34 if required.

Agenda Item 6 – Proposed Draft Code of Practice on the Processing of Scallop Meat

Associated CRD(s) – 6, 19

Following the progress made on the associated Standard during this session (refer agenda item 5, above), and noting the revised document drafted by Canada during the session to bring the Code of Practice into alignment with the Standard (CRD 19), the Committee agreed that the document as presented in CRD19 would be circulated for comment at Step 3 and further developed through an electronic working group, led by Canada. If necessary, a physical working group would also be held immediately prior to the next session.

In regards to written comments received ahead of CCFFP33, it was agreed that there are still a few outstanding issues which need to be addressed including the appropriateness of using dead scallops, the risk of biotoxin presence, and the need for further guidance on short haul voyages.

Recommended actions for SafeFish:

SafeFish to actively participate in the eWG and provide written comment for CCFFP34 if required.

Agenda Item 7 – Proposed Draft Code of Practice for Fish and Fishery Products (Section on Sturgeon Caviar)

Noting that the associated Standard for Sturgeon Caviar had only recently be concluded, the Committee was reminded that debate on certain aspects such as food additive provisions etc had occurred during the standard development process and that the Code of Practice should align with the Standard.

Due to time constraints, the Committee agreed to establish an electronic working group to re-draft the document on the basis of comments made in writing ahead of, and comments made during, CCFFP33. This document will then be circulated at Step 3 ahead of the next session.

Recommended actions for SafeFish:

Nil

Agenda Item 8 – Proposed Draft Code of Practice for Processing of Fish Sauce

Associated CRD(s) – 8, 16

CRD 16 was used as the basis for discussion in plenary. Following discussion, this item was progressed to Step 5 for adoption by the Commission.

Good progress was made on this document and no interventions by the Australian delegation were required. Due to time constraints, comments of an editorial nature were not invited.

Recommended actions for SafeFish:

Upon circulation, consider the document at Step 5 and provide written comment for CCFFP34 if required.

Agenda Item 9 – Proposed Food Additive Provisions in Standards for Fish and Fishery Products (food additive provisions in adopted standards)

Associated CRD(s) – 9, 15, 22

This agenda item was preceded by an in-session working group, chaired by the US (CRD 22 refers). Due to competing priorities, SafeFish was unable to participate.

Significant progress was made in relation to the review of food additive provisions in existing fish and fishery product standards, with agreement being reached on the food additive provisions in 11 of the 12 standards reviewed. It was agreed that the food additive provisions for phosphates and humectants in the Standard for Canned Crab Meat required further consideration at the next session.

In addition to forwarding the work completed during this session to CCFA for endorsement, the Committee agreed to establish an electronic working group to continue to review food additive provisions in fish and fishery product provisions and correct inconsistencies/inaccuracies based on technological justification/need.

Recommended actions for SafeFish:

Participate in the eWG and provide written comment for 34CCFFP if required

Agenda Item 10 – Discussion Paper on Histamine

Associated CRD(s) – 10, 21

This agenda item was preceded by an in-session working group, chaired by Japan (CRD 21 refers). SafeFish through the Australian delegation actively participated. While there was a common understanding that histamine formation can be controlled by applying HACCP/GHP, there was lack of consensus in relation to the need to develop an uncertainty factor (UF) and, if required, the role of CCFFP in doing so. Debate on these points continued within plenary.

An intervention made by the Chair advocated the need for the Committee to act promptly in relation to the recommendations of the Joint FAO/WHO Export Meeting on the Public Health Risks and Other Biogenic Amines from Fish and Fishery Products and noted that the development of an UF was the responsibility of CCFFP. Following discussion, the Committee agreed to conduct an electronic working group to further consider histamine management tools, including HACCP/GHP, development and application of an UF, and revision of the susceptible species list.

Recommended actions for SafeFish:

Actively participate in the eWG and provide written comment for 34CCFFP if required

Agenda Item 11 – Discussion Paper on Nitrogen Factors

The main intent of this paper was to propose an avenue forward in relation to the determination of nitrogen factors, noting that as currently written, continued work by CCFFP would be needed in order to review and update the details referenced in the Standard. It was proposed that the table for nitrogen factors and the procedure for obtaining nitrogen factors be hosted outside of the Codex environment (e.g. FAO website or the UK Royal Society of Chemistry). Due to the late distribution of the discussion paper, the Committee agreed to postpone any decisions until the next meeting.

Recommended actions for SafeFish:

Consider the information presented in the discussion paper along with the proposed amendments to the Standard (to be circulated prior to the next session), and provide written comment for 34CCFFP if required.

Agenda Item 12 – Code of Practice for Fish and Fishery Products (optional final product requirements)

Associated CRD(s) – 11, 12

While many delegations expressed a view that the elaboration of optional final product requirements (Appendices II-XI) fell outside of the remit of Codex, some delegations (notably the EU delegation as led by the position of France) firmly stated a need to retain the information. Despite a proposal by the FAO to host such information on the GLOBEFISH website (www.globefish.org), the Committee eventually agreed that a Circular Letter would be sent inviting countries to assess those sections of the appendices already drafted or adopted with a view to making recommendations for text to be integrated into the Code at the next session. The Committee also recalled the decision at the last session to continue work on Appendix I: Modified Atmosphere Packaging.

Recommended actions for SafeFish:

- **Upon circulation, consider what elements of the optional appendices (II-XI) should be integrated into the Code and provide written comment for 34CCFFP if required.**
- **Upon circulation, develop written comment on Appendix I: Modified Atmosphere Packaging, noting the decision of the Committee to integrate this information into the Code.**

Agenda Item 13 – Other business and future work

Associated CRD(s) – 18

The delegation of Columbia tabled CRD 18 – request for new work for the development of a Standard for Fresh Chilled Pirarucu (*Arapaima gigas*) Fillet or Whole Fish. This matter was not considered during the session. The delegation of Columbia agreed to prepare a project document for consideration at the next session.

Recommended actions for SafeFish:

Upon circulation, consider the request for new work and provide written comment for 34CCFFP if required.