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Subject: Report on the 31st Session of CCFPP, Tromso 11-16th April 2011.

Dear Dr. McLeod,

On behalf of SafeFish I have recently attended the 31st Session of the Codex Committee on Fish and Fishery Products in Tromso, in the position of technical advisor. From Australia's perspective the meeting went very well, with nearly all of the desired outcomes achieved.

Please find attached a summary of agenda items from this meeting that are of relevance to SafeFish, and a recommended list of actions for SafeFish resulting from the meeting. Note that this summary contains confidential information that is not for general distribution.

Outcomes of particular importance to the Australian Seafood Industry, and likely to require significant future SafeFish resources are:

1. New work on Screening Methods for Biotoxins

The measurement and management of biotoxins is a rapidly developing science.

Chemical testing procedures are highly technical and complex. Many countries are trying to come to grips with modern advancements, and it is important that regulations keep up with the science, whilst at the same time allowing enough flexibility to:

- enable the uptake of novel biotoxin quantification techniques in the future if they meet all the necessary criteria, and

- enable the utilisation of current techniques until the newer, improved techniques can be phased in.

There is considerable unease around chemical testing methods for biotoxin quantification, particularly by countries more familiar with mouse bioassay techniques. Acceptance of these improved methods hinges on accessible advice on implementation of the new methods and appropriate phase in periods. The offer by FAO to house advice on chemical methods has gone a long way to easing concerns. Australia uses various screening methods in the current biotoxin management of bi-valve growing areas: screening methods are often a cheap and rapid management tool. Appropriate guidelines around the use of screening methods will ensure this practice can continue with international acceptance.

Canada, Australia and New Zealand have been the main advocates for chemical biotoxin testing methods. It is important for the Australian industry to maintain this role, and ensure the development and acceptance of suitable screening criteria in line with the proposed reference and confirmatory criteria.

2. The ongoing work on the Draft Standard for Fresh/Live and Frozen Abalone.

In general good progress was made on this standard with countries in agreement that abalone posed a smaller health risk than bi-valve molluscs. However it was not accepted that processed abalone with the viscera and epithelium removed was of negligible biotoxin risk. Further work is needed to support this argument.

It was agreed that each country should be able to manage biotoxins in abalone via risk assessments. The Australia abalone industry will need scientific input into a risk assessment for this industry. This issue is particularly relevant in light of recent developments in the Tasmanian fishery where biotoxins have been detected in both the foot and viscera of abalone.

The use of sulfites in abalone products may also require some technical justification given the current focus on food additives as detailed below.

3. *New work to examine the public health significance of Histamine in Fish and Fishery Products*

This new work was proposed following the recognition of the significance of histamine in all fisheries products, not just fish sauce. The work will look at all countries sampling programs and risk management strategies, and also look at the potential trade implications.

The broad scope of the work indicates a potential for impact on Australian fish exports, and thus the importance of this issue to Safefish.

4. *A broadening of work on Foods Additives to include all commodities*

Work currently conducted by the CCFFP also highlighted Food Additives as an issue across more than one commodity group.

Concern was voiced at the 31st Session on alignment between individual commodity standards and the General Standard for Food Additives. It was recognised that in order to justify any differences, appropriate technological papers would be required. Similarly any new additives proposed will require appropriate scientific support.

Other work arising from the meeting and described in the attached summary are:

- Review of the FAO report on Salmonella in Bivalves and potential actions arising from this
- Review of the Draft Standard for Smoked Fish and Draft Code of Practice for Fish and Fishery Products
- Review of the Draft Standard for Quick Frozen Scallop Adductor Meat, including an expanded scope to add scallop with roe-on

I thank you for the opportunity of attending this Codex meeting, and look forward to discussing this report with you further.

Regards



Alison Turnbull.

Summary of recommended future work for SafeFish resulting from the 31st Session CCFFP:
(see report below for context)

Agenda Item	Stage	Recommended Actions for SafeFish
2a. Matters Referred – Criteria for <i>Salmonella</i> in bivalves	Final Report soon to be released by FAO	<ol style="list-style-type: none"> 1. Upon its release, carefully review the final report. <ol style="list-style-type: none"> a. Should the findings of the final report indicate that the removal of the criteria for <i>Salmonella</i> from the Standard for Raw and Live Bivalve Molluscs as the most appropriate avenue forward; support this position. b. Should the final report recommend the introduction of any risk management protocols; assess the recommendations carefully and ensure the proposed risk management protocols are both sensible and practical. 2. Provide feedback to the Australian delegates to the CCFFP with adequate briefing on a suitable position for Australia on this issue.
3. Draft Standard for Fish Sauce	Step 8	Actively participate in the electronic working group on histamine for all Fish and Fishery Products.
4. Draft Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish	Step 7 Food Additives section at step 4	<ol style="list-style-type: none"> 1. Actively participate in the electronic working group on food additives. 2. Assess the current draft Standard and, if required, provide written comments to the Australian delegates to the CCFFP.
5. Proposed Draft Code of Practice for Fish and Fishery Products (other Section Including Smoked Fish)	Step 5/8	Provide feedback, and if required rationale as to whether SafeFish supports the current text, to the Australian delegates to the CCFFP.
7. Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat	Step 5	Upon re-circulation for comment, assess the current draft Standard, particularly with regard to the new scope, and if required, provide written comments to the Australian delegates to the CCFFP.

Agenda Item	Stage	Recommended Actions for SafeFish
8. Proposed Draft Code of Practice on the Processing of Scallop Meat	Step 3	<p>Upon re-circulation for comment, assess the current draft Code and, if required, provide written comments to the Australian delegates to the CCFFP.</p>
10. Proposed Draft List of Methods for Determination of Biotoxins in the Standard for Live and Raw Bivalve Molluscs	Step 3	<ol style="list-style-type: none"> 1. Work with the Australian delegates to develop a first-draft of the proposal for new work for provision to Canada by mid-May 2011. 2. Assess the current draft criteria and, if required, provide written comments as requested. <ol style="list-style-type: none"> a. Provide the Australian delegates to CCFFP with support to actively work with those delegations, such as the delegation of United States, who hold reservations with respect to draft criteria for reference and confirmatory methods. 3. Should new work be approved, ensure appropriately skilled people are involved and actively participate in the electronic working group. <ol style="list-style-type: none"> a. Pay particular attention to the definition of 'screening methods' noting the comments below regarding the use of the mouse bioassay. b. Provide the Australian delegates to CCFFP with support to actively work with those delegations, such as the delegation of United States, who hold reservations around describing mouse bioassay as a "screening" method, and the use of screening methods for control purposes.

Agenda Item	Stage	Recommended Actions for SafeFish
<p>11. Proposed Draft Standard for Fresh/Live and Frozen Abalone (<i>Haliotis spp.</i>)</p>	<p>Step 5</p>	<ol style="list-style-type: none"> 1. Carefully assess the current draft Standard and, where required, provide written comments to the Australian delegates to CCFFP which are supported by clear, scientifically justified rationales. <ol style="list-style-type: none"> a. Particular attention should be paid to I-8.4 Determination of Biotoxins, I-9 Definition of Defectives, II-2 Description, II-3 Essential Composition and Quality Factors, and II-4 Food Additives as detailed above. 2. Provide scientific support to the Australian delegates to the CCFFP to actively work with those delegations who hold reservations with respect to the biotoxin risk of processed abalone from which the viscera and epithelium have been removed.
<p>13. Proposed Food Additive Provision in Standards for Fish and Fishery Products – Matters referred by CCFA</p>		<p>Ensure appropriately skilled people are involved and actively participate in the electronic working group.</p> <ol style="list-style-type: none"> a. Give careful consideration to the technological justification for future inclusion of additives used by the Australian industry, particularly sulfites.

Agenda Item 2 – Matters Referred

1. Criteria for Salmonella in the Standard for Live and Raw Bivalve Molluscs

Associated CRD(s) – 9, 12

The Committee was presented with an interim report of the Electronic Expert Group which considered the public health risk due to *Salmonella* in live and raw bivalves and the utility of sampling plans for public health protection.

The Expert Group, through their reporting in the interim report of issues, uncertainties, data gaps and challenges, did not seem convinced that *Salmonella* is a significant public health issue in bivalves. The Expert Group reported that the risk of potential *Salmonella* contamination seems to be managed effectively by current measures to manage faecal contamination in general. The exception may be Class B growing areas: more work is needed in this area.

Given this position, and based on the assumption that the finding presented in the final report should not differ markedly from those presented in the interim report, the Committee concluded that it might be necessary to remove the criteria for *Salmonella* from the Standard.

Recommended actions for SafeFish:

1. Upon its release, carefully review the final report.
 - a. Should the findings of the final report indicate that the removal of the criteria for *Salmonella* from the Standard for Raw and Live Bivalve Molluscs as the most appropriate avenue forward; support this position.
 - b. Should the final report recommend the introduction of any risk management protocols; assess the recommendations carefully and ensure the proposed risk management protocols are both sensible and practical.
2. Provide feedback to the Australian delegates to the CCFFP with adequate briefing on a suitable position for Australia on this issue.

Agenda Item 3 – Draft Standard for Fish Sauce

Associated CRD(s) – 4, 6, 9, 10, 14, 15, 16, 17, 18, 22, 26, 28, 29, 30

As a result of the work conducted during the 31st Session, the Committee agreed to advance the Proposed Draft Standard for Fish Sauce to Step 8 for adoption by the Commission.

Histamine Level

Hygiene and Handling, 6.4

While Australia initially held reservations regarding the proposed histamine level of no more than 40mg/100g of fish sauce, which is double the provision in the Australia New Zealand Food Standards Code, Australia supported the progression of the Standard to Step 8 for the following reasons:

- The Codex Committee on Food Hygiene considered and endorsed the hygiene provisions in the draft Standard (at Step 5), including proposed histamine levels.
- The delegation of Thailand presented to the Committee, for information and consideration, the executive summary of a risk assessment on histamine in fish sauce (CRD 18). The risk assessment demonstrated that, particularly due to the low daily consumption volume, the risk of consuming fish sauce with a histamine content of not more than 40mg/100g did not differ to consuming fish sauce with a histamine content of not more than 20mg/100g.

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- While the Australia New Zealand Food Standards Code prescribes a maximum histamine level for all fish products of 20mg/100g, for the purpose of histamine testing in imported products, the Australian delegation was informed that fish sauce is not considered a fish product unless visible pieces of fish are present in the liquid.

Proposal for new work

During discussion on histamine levels in the draft Standard for Fish Sauce, the delegation of Japan proposed that issues related to histamine should be considered more generally with a view to reviewing the public health risk of histamine consumption from fish and fishery products. The delegation of Japan suggested that this proposal should be considered in conjunction with the work on microbiological criteria underway in the Committee on Food Hygiene.

CRD 28 details the Terms of Reference for an electronic working group through which it is envisaged a project document detailing the proposal for new work will be developed.

Biotoxins

The Committee agreed to include additional information on biotoxins under Contaminants, Section 5.2 which states '*Raw material fish for fish sauce shall not contain marine biotoxins (e.g. Ciguatoxin, Tetrodotoxin and PSP) in amounts which could present a risk to human health*'.

Australia supported this provision, noting that it allows competent authorities to determine safety limits based on the fish species used in production, relative biotoxin risk, and consumption data.

Development of a Code of Practice for Fish Sauce

The delegation of Thailand recommended that new work be initiated on the development of a Code of Practice for Fish Sauce. A project document detailing the new work proposal will be developed by the delegation of Thailand and circulated for consideration at the next Session.

Recommended actions for SafeFish:

Actively participate in the electronic working group on histamine.

Agenda Item 4 – Draft Standard for Smoked Fish, Smoke-Flavoured Fish and Smoked-Dried Fish

Associated CRD(s) – 3, 7, 9, 11, 13, 14, 15, 16, 21, 22, 30

The Committee agreed to hold the draft Standard at Step 7 and return Section 4, Food Additives, for re-drafting by the electronic working group on Food Additives (refer Agenda Item 13) and circulation for comment (at Step 6) prior to the next Session.

Successful progress made to the proposed draft Code of Practice for Fish and Fishery Products (other sections including smoked fish) (refer Agenda Item 5) resulted in the need for alignment of many elements of the draft Standard with the revised text agreed to for the Code of Practice.

Determination of visible parasites

Prior to the Session, Australia considered whether the current text included under Section 8.10 Determination of Visible Parasites, was too prescriptive and not amenable to variations of inspection practices in different countries. It was suggested that, as an alternative, text could be proposed which allows for different procedures as approved by the relevant competent authority.

Following discussions with other delegations in the margins of the plenary, Australia ascertained that the current proposed text is standard across all existing fish and fishery product Standards in which parasite determination is required. This text was agreed to following favourable international consideration of the ability for all countries to meet the prescribed method.

Recommended actions for SafeFish:

1. **Actively participate in the electronic working group on food additives.**
2. **Assess the current draft Standard and, if required, provide written comments to the Australian delegates to the CCFFP.**

Agenda Item 5 – Proposed Draft Code of Practice for Fish and Fishery Products (other sections including smoked fish)

Associated CRD(s) – 2, 4, 6, 9, 10, 14, 16, 22

A physical working group on the Draft Code of Practice for Fish and Fishery Products (other sections including smoked fish) was held on Sunday, 10 April 2011, from 10am-5pm and 6pm-7pm. Australia actively participated in this working group.

Significant progress was made during the working group, and as a result, combined with the work conducted during plenary, the Committee agreed to advance the Draft Code of Practice for Fish and Fishery Products (other sections including smoked fish) to Step 5/8 for adoption by the Commission with the recommendation to omit Steps 6 and 7.

Biotoxins

During the working group, the delegation of the United States proposed the removal of the requirements for biotoxins under the technical guidance section of 12.1.2 Salting. This proposal addressed Australia's concerns and alleviated the need for the inclusion of additional detail such as species of fish for which biotoxins would need to be considered as a hazard.

Histamine

As foreshadowed in their written comments, the delegation of Canada recommended the inclusion of an example list of susceptible species for which histamine formation is a known risk. This proposal associated rationale was supported by the Committee and was also adopted into the Draft Standard for Smoked Fish, Smoke-Flavoured Fish and Smoked-Dried Fish.

Wood or Plant Material for Smoking

The delegation of Australia proposed the removal of the example 'eucalyptus' under Section 12.1.5, Reception of Wood or Plant Material for Smoking, bullet point two (species not suitable for smoke

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production). The delegation of Australia explained that eucalyptus saw dust is successfully used as a smoking agent in Australia with no known associated health effects.

The proposal was supported and adopted by the Committee.

Recommended actions for SafeFish:

Provide feedback, and if required rationale as to whether SafeFish supports the current text, to the Australian delegates to the CCFFP.

Agenda Item 6 – Proposed Draft Amendment to Section 3.4.5.1 Water of the Code of Practice for Fish and Fishery Products

Associated CRD(s) – 9, 16, 22, 24

As a result of discussions during the 31st session, the Committee agreed to advance the Draft Code of Practice for Fish and Fishery Products (other sections including smoked fish) to Step 5/8 for adoption by the Commission with the recommendation to omit Steps 6 and 7.

Noting the time, effort and expertise the Committee on Food Hygiene dedicated to a similar issue, the Committee supported the proposal to align Section 3.4.5.1, Water, in the Code of Practice for Fish and Fishery Products, with the text agreed to by the Committee on Food Hygiene with respect to the use of chemical decontaminants in the Guidelines for the Control of *Campylobacter* and *Salmonella spp* in Chicken Meat.

The proposed text, as provided in CRD 24, alleviated the concerns of several delegations by allowing for competent authority approval of higher concentrations of chlorine in water treatment, and by ensuring attention is paid to the possible formation of potential toxic compounds when adding chlorine to seawater.

No SafeFish action necessary.

Agenda Item 7 – Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat

Associated CRD(s) –5, 9, 14, 21, 22, 31-R

An in-session working group on the Draft Proposed Standard on Scallops, led by Canada, was held in the margins of the 31st Session. As a result of the work conducted the Committee agreed to forward the Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat to the Commission for adoption at Step 5.

Amendment of the Scope

During the 31st Session, following a request by the delegation of the United Kingdom, the Committee agreed to amend the scope of products under the Standard to included frozen roe-on scallop meat processed with water or food additives.

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It was noted that frozen roe-on scallop meat processed with water or food additives is widely traded and is not covered by the any other existing Standard. As such, it was deemed appropriate to expand the scope of the Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat and, if necessary, transfer relevant sections regarding biotoxins from the Standard for Live and Raw Bivalve Molluscs.

Recommended actions for SafeFish:

Upon re-circulation for comment, assess the current draft Standard, particularly with regard to the new scope, and if required, provide written comments to the Australian delegates to the CCFFP.

Agenda Item 8 – Proposed Draft Code of Practice on the Processing of Scallop Meat

Associated CRD(s) –4, 9, 10

Given the Committee had previously agreed to retain the Proposed Draft Code of Practice at Step 4, pending further progress on the development of the Proposed Draft Standard for Quick Frozen Scallop Adductor Muscle Meat, this item was not discussed during the 31st Session. However, it was agreed to return the draft Code of Practice to Step 3 for comments and consideration at the next Session.

It was also agreed that a physical working group, led by Canada, would meet immediately prior to the 32nd Session.

Recommended actions for SafeFish:

Upon re-circulation for comment, assess the current draft Code and, if required, provide written comments to the Australian delegate to the CCFFP.

Agenda Item 10 – Proposed Draft List of Methods for determination of Biotoxins in the Standard for Raw and Live Bivalve Molluscs

Associated CRD(s) –9, 19, 25, 32

This was a key agenda item for Australia

As a result of the work conducted prior to, and during, the plenary, the Committee agreed to circulate the proposed criteria for comments at Step 3.

An electronic working group on the Proposed Draft List of Methods for determination of Biotoxins in the Standard for Raw and Live Bivalve Molluscs, led by Canada, was conducted prior to the 31st Session. Australia actively participated in the electronic working group for which the mandate was to develop performance criteria for the determination of biotoxins in the Standard for Live and Raw Bivalve Molluscs.

Significant work conducted by Australia in the electronic working group, combined with active discussions with other delegations, including the representative to the FAO, in the margins of the plenary, was instrumental to the successful progress and decisions made during the Session.

Continued effort by Australia on this work, and specific engagement with delegations, such as the delegation of the United States, will be required to progress the work further and to allay the concerns of many delegations regarding the use of mouse bioassay for testing purposes.

For Australia, it became apparent that the Draft Performance Criteria/Parameters for Methods for the Determination of Biotoxins in the Standard for Live and raw Bivalve Molluscs apply to *reference* and *confirmatory* methods only. Many delegations, including the delegation of the United States and some member states of the European Union, expressed significant concern that the criteria, as written, exclude the use of the mouse bioassay which is used by these delegations at a national level for control purposes. In an attempt to allay these concerns, the delegation of Australia explained that methods that do not meet the criteria can still be used for screening purposes and proposed that the title of the criteria be amended to include the words '*reference and confirmatory*'. This proposal was accepted by the Committee.

However, significant concern remained was expressed by many countries regarding the ability of countries to continue to use the mouse bioassay for control purposes. The delegation of the United States went as far as to suggest that the draft criteria [for reference and confirmatory methods] be amended to 'fit' the mouse bioassay. While this proposal was not accepted during the plenary, in favour of developing a new set of criteria which apply to screening methods, concerns remain about the use of mouse bioassay. The delegation of Australia believes these concerns can be addressed through the development of criteria for screening purposes providing the definition for 'screening methods' clearly demonstrates that countries can continue to use the mouse bioassay at a national level for control purposes. This position is supported by the delegations of Canada and New Zealand.

During the plenary, discussion also centered on the need to list example methods in a Codex document (Standard or Code), in addition to including the criteria. As a direct result of a recommendation from the delegation of Australia during the margins (supported by the delegations of Canada and New Zealand), the representative to the FAO offered to host, on the FAO website, relevant information on the methods which could be used in line with the criteria. This information would be kept up-to-date and would draw upon current expertise, including the work carried out in the Expert Consultation on Marine Biotoxins. The existence of this information on the FAO website addressed concerns previously expressed by several delegations with regard to information availability, particularly for developing nations, and alleviated the need to include an example list of methods in a Codex document. The Committee warmly welcomed the proposal by the FAO.

New Work

The Committee agreed to the proposal by the electronic working group to develop criteria for screening methods in addition to criteria for reference and confirmatory methods. The Committee also agreed that consideration to extend the criteria for biotoxin testing methodologies to commodities other than bivalves, e.g. abalone, should be given.

At the request of the Chair, the delegations of Australia and Canada prepared draft Terms of Reference and mandate for this work (CRD 32). Subsequently, the Committee agreed to propose this new work to the Executive Committee and the Commission. It was agreed that Australia and Canada

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would prepare the complete project document for submission to the Executive Committee and the Commission by the end of May 2011.

Subject to approval of the new work, the Committee agreed to establish an electronic working group to progress this work prior to the 32nd Session.

Recommended actions for SafeFish:

1. Work with the Australian Delegates to CCFFP to develop a first draft of the proposal for new work for provision to Canada by mid-May 2011.
2. Assess the current draft criteria and, if required, provide written comments as requested.
 - a. Actively work with those delegations, such as the delegation of United States, who hold reservations with respect to draft criteria for reference and confirmatory methods.
3. Should new work be approved, ensure appropriately skilled people are involved and actively participate in the electronic working group.
 - a. Pay particular attention to the definition of 'screening methods' noting the comments above regarding the use of the mouse bioassay.
 - b. Actively work with those delegations, such as the delegation of United States, who hold reservations around describing mouse bioassay as a "screening" method, and the use of screening methods for control purposes.

Agenda Item 11 – Proposed Draft Standard for Fresh/Live and Frozen Abalone (*Haliotis spp.*)

Associated CRD(s) –9, 10

This was a key agenda item for Australia

Significant work conducted by Australia in providing advanced comments on this Standard prior to the 31st Session, combined with active discussions with the lead country (South Africa) prior to the plenary, proved integral in progressing the draft Standard forward in a constructive and positive manner during the Session.

As a result of the work conducted during the 31st Session, the Committee agreed to forward the Proposed Draft Standard for Fresh/Live and Frozen Abalone (*Haliotis spp.*) to Step 5 for adoption by the Commission.

Almost all of Australia's written comments (refer CX/FFP 11/31/11 – Add.1), some with minor amendments, were adopted into the revised draft Standard. Additional amendments of note, and areas for which future effort by Australia will need to be directed, are detailed below.

I-2.2 Process Definition

Following a proposal by the delegation of the United States, the need for approval of the harvesting area or farm by the official agency having jurisdiction was deleted. The Committee agreed that abalone pose a lesser microbiological hazard than filter feeding shellfish for which this kind of approval is required.

I-5 Contaminants

Australia's recommendation was adopted in part. At the request of the delegation of South Africa, the proposed wording '*edible portion of the abalone*' was replaced with '*the part of the abalone to be consumed*'. The recommendation to exclude the provisions of this section to processed abalone meat that has had the viscera and epithelium removed was not adopted (refer Section II-2 below for more information).

The Committee agreed to include reference to the marine biotoxin levels in the Standard for Live and Raw Bivalve Molluscs, and agreed that even though the levels in this Standard focused on bivalve molluscs, they would also be applicable to abalone. It was agreed that the levels should be forwarded to the Committee on Contaminants in Food for endorsement.

I-8.4 Determination of Biotoxins

Taking into account the decision on the work on the Proposed Draft Performance Criteria for Reference and Confirmatory Methods for Marine Biotoxins, the Committee agreed to retain the method for saxitoxin as presented but to include, in square brackets, reference to the proposed criteria.

Prior to the next Session, Australia should prepare comments which support the removal of the specific method for saxitoxin and advocate the inclusion of a reference to the performance criteria.

I-9 Definition of Defectives

Australia's proposal to add the word '*may*' and delete the words '*does not*' from section I-9.1 Foreign Matter was not accepted on the basis of consistency of wording with other Standards.

Under Section I-9.2, the second sentence was amended by replacing '*they can no longer function biologically*' with '*their integrity is questioned*'. The delegation of Australia questions the strength in this amendment and recommends that written comments be provided prior to the next Session.

II-2 Description

The proposal by the delegation of Australia to specify that 'Section II-5 of this Standard does not apply to processed abalone meat that has had the viscera and epithelium removed' was square bracketed.

Concerns about this recommendation were flagged by the delegation of Japan, with this delegation expressing concern about the presence of biotoxins in the foot. At the recommendation of the delegation of New Zealand, the Committee agreed to place the Australian proposal in square brackets until it could be verified that biotoxins were not relevant when the epithelium and viscera were removed.

To progress forward on this proposal, it will be important for Australia to convince the Committee, in particular the delegation of Japan, that removing the viscera and epithelium significantly reduces the risk of biotoxins. Australia will also need to give careful consideration to the potential ramifications should the proposal not be accepted in the future.

II- 3 Essential Composition and Quality Factors

Australia's proposal under Section II-3.4 Final Product, is directly linked to the issue flagged above at Section II-2.

II-4 Food Additives

The Australian delegation advocated, both in the Quad/Quad-EU meetings and in the plenary, that antioxidants as listed in Food Category 09.2.1 of the General Standard for Food Additives should continue to be permitted for use.

While this proposal was accepted during the 31st Session, it is important to note the outcomes of the discussions under Agenda Item 13 – Proposed Food Additive Provision in the Standards for Fish and Fishery Products, where it was stipulated that in the process for elaborating additive positions in new standards, clear technological justification should be provided for all additives proposed. Therefore, to justify the continued acceptance of additives used by the Australian industry, such as sulfites, in abalone products that fall within the scope of the standard, such as pouched product, Australia will need to work with like minded countries to develop clear technological justification.

Recommended actions for SafeFish:

- 1. Carefully assess the current draft Standard and, where required, provide written comments which are supported by clear, scientifically justified rationales.**
 - a. Particular attention should be paid to I-8.4 Determination of Biotoxins, I-9 Definition of Defectives, II-2 Description, II- 3 Essential Composition and Quality Factors, and II-4 Food Additives as detailed above.**
- 2. Provide scientific information to allow to the Australian delegates to the CCFFP to actively work with those delegations that hold reservations with respect to the biotoxin risk of processed abalone from which the viscera and epithelium have been removed.**

Agenda Item 13 – Proposed Food Additive Provision in the Standards for Fish and Fishery Products

Associated CRD(s) –9, 10, 19, 30,

An electronic working group on the Proposed Food Additive Provision in the Standards for Fish and Fishery Products, led by the United States and the European Union, was conducted prior to the 31st Session. Australia actively participated in the electronic working group for which the purpose was to establish a review/development procedure for additive provisions.

Additionally, an in-session working group was held in the margins of the 31st Session. The main purpose of the work on Proposed Food Additive Provision in the Standards for Fish and Fishery Products is to adopt uniformity in additive provisions contained in the various Standards for Fish and Fishery Products Manual and the General Standard for Food Additives.

The main purpose of the in-session working group was to consider the additive sections within the Standards currently under consideration. In the time available, and in order of the priorities set by the Committee, the working group was able to elaborate proposed positions on the Standard for Fish

Sauce, and the Draft Standard for Smoked Fish, Smoked Flavoured Fish and Smoke Dried Fish. The position for the Standard for Fish Sauce was later adopted by the Committee.

To further progress this work, the Committee agreed to establish a further electronic working group, led by the United States and the European Union, to:

1. continue to review the food additive provisions in adopted standards with a view of achieving alignment with the General Standard for Food Additives;
2. further review the additive section in the Draft Standard for Smoked Fish, Smoked Flavoured Fish and Smoke Dried Fish.

It was also agreed to that in the above process, and in the process for elaborating additive positions in new standards, clear technological justification should be provided for all additives proposed.

It will be important for Australia to actively and competently participate in the electronic working group to ensure that all additives currently used by the Australian industry remain in the relevant Codex Standard(s). It is also important to note the decision by the Committee for the need for technological justification of use. It will be important for Australia to work with like minded countries on this issue, particularly with respect to the use of sulfites.

Recommended actions for SafeFish:

1. **Ensure appropriately skilled people are involved and actively participate in the electronic working group.**
 - b. **Give careful consideration to the technological justification for future inclusion of additives used by the Australian industry, particularly sulfites.**