



## **SafeFish Report of the Codex Committee on Fish and Fishery Products (CCFFP) meeting**

**Alesund, Norway**

**19-24 October 2015**

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## Executive Summary

All in all, successful outcomes for the Australian seafood industry were achieved at the 34<sup>th</sup> Session of CCFFP as a result of active contribution by SafeFish and Australian seafood industry representatives.

Prior to the meeting extensive technical briefs had been prepared for two agenda items:

1. Proposed Draft Code of Practice on the processing of Fresh and Quick Frozen Raw Scallop Products,
2. Discussion Paper on Histamine.

The Australian delegation participated in physical working groups on both of these agenda items prior to, and during CCFFP34. Preparatory work was also conducted for a further two agenda items: Sampling Plans in Standard for Fish and Fishery Products, and Proposed Food Additive Provisions in Standards for Fish and Fishery Products, Code of Practice for Fish and Fishery Products (Optional final product requirements for commodities/Appendix on Modified Atmosphere Packaging).

The finalised Code of Practice on the processing of Fresh and Quick Frozen Raw Scallop Products aligns with current Australian practices, with the exception that in some cases, a hazard analysis for biotoxins in scallops may be necessary, and/or regular biotoxin monitoring.

An electronic working group was proposed to continue discussions on histamines as agreement could not be reached on safe maximum levels, and more work was considered necessary in this area.

Actions for SafeFish arising from CCFFP34 are summarized below.

Agenda item	Action for SafeFish
2a. Sampling Plans in Standard for Fish and Fishery Products	Discuss specifics of outcome with the Australian delegation for Codex Committee of Measurement Analysis and Statistics
4. Proposed Draft Code of Practice on the processing of Fresh and Quick Frozen Raw Scallop Products	Distribute finalized Standard and Code of Practice to regulators and the scallop industry in Australia
8. Code of Practice for Fish and Fishery Products (Optional Final Product Requirements for Commodities/Appendix on MAP)	Monitor the workplan of CCFH and actively contribute to any work which may be undertaken in relation to Modified Atmosphere Packaging
9. Discussion Paper on Histamine	Support the proposal for new work and actively participate in the electronic and/or physical working group/s

As a result of completing or referring to other Committees all but one piece of work on the agenda for the Codex Committee on Fish and Fishery Products (CCFFP), it was agreed during this session to suspend physical meetings and, where needed, work by correspondence. In this regard, the Committee agreed to continue new work on histamine by correspondence; however physical working groups will be convened if required.

Continued involvement on fish and fishery product related issues which will be addressed by horizontal Committees, as well as the ongoing work on histamine, will be required to ensure Australia's position is continued to be reflected in the development of international standards.

**Matters referred to the Commission and other Committees:**

Agenda Item	Commission / Committee	Reason for referral
Matters Referred – Codex Strategic Plan	CCEXEC and Commission	Consideration of CCFFP replies to the Strategic Pan 2014-2019.
Matters Referred – Sampling plans in standards for fish and fishery products	CCMAS	<p>The Committee considered that the sampling plans for parasites were not appropriate with respect to the AQL as per Table 10 of CAC/GL 50-2003.</p> <p>The Committee will request CCMAS consider making CAC/GL 50-2003 more user friendly.</p>
Draft Code of Practice for Processing of Fish Sauce	CCFH	Endorsement at Step 8.
	Commission	Adoption at Step 8.
Proposed Draft Code of Practice on the Processing of Fresh and Quick Frozen Raw Scallop Products	Commission	Adoption at Step 5/8 (with omission of Steps 6/7) and inclusion in the Code of Practice for Fish and Fishery Products.
Proposed Draft Code of Practice for Fish and Fishery Products (Section on Sturgeon Caviar).	CCFH	Section X.16 Extra saltwater removal - endorsement at Step 5/8.
	Commission	Adoption at Step 5/8 (with omission of Steps 6/7) and inclusion in the Code of Practice for Fish and Fishery Products.
Proposed Food Additive Provisions in Standards for Fish and Fishery Products	CCFA	<p>Request alignment of the provision of ethylene diamine tetra acetates (INS 385-3860 in food category 9.4 of the GFSA with that of the Standard for Canned Shrimps or Prawn.</p> <p>Request revision of the text of Note 299 of the GFSA.</p>
	CCFA	Inform CCFA regarding the technological function of phosphates INS 342 (i), (II) and INS 343 (i) – (iii) in the Standard for Fresh and Quick Frozen Raw Scallop Products.
	Commission	Forward amendments for adoption.
Discussion Paper on Nitrogen Factors	FAO	<p>Request FAO develop a table of nitrogen factors for the chemical analysis method.</p> <p>Request the FAO develop a uniform</p>

		nitrogen factor study, design and procedure to support the table.
	CCMAS	Endorsement of Amended section 7.4 of the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter .
	Commission	Adoption of Amended section 7.4 of the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter .
Code of Practice for Fish and Fishery Products (Optional Final Product Requirements for Commodities/Appendix on MAP)	Commission	Adoption of amended Section 11.  Inform that work on Appendices 1-11 will be discontinued and all references removed from the relevant sections of the Code.

**Summary of work program of the Codex Committee on Fish and Fishery Products (see below for context)**

Work Item	Details	Australian Participation
Draft Code of Practice for Processing of Fish Sauce	39CAC (adoption Step 8)	N/A – pending endorsement.
Draft Code of Practice for Processing of Fish Sauce	39CAC (adoption Step 8)	N/A – pending endorsement
Proposed Draft Code of Practice on the Processing of Fresh and Quick Frozen Raw Scallop Products	39CAC (adoption Step 5/8)	N/A – pending endorsement
Proposed Draft Code of Practice for Fish and Fishery Products (Section on Sturgeon Caviar).	39CAC (adoption Step 5/8)	N/A – pending endorsement
Proposed Food Additive Provisions in Standards for Fish and Fishery Products	39CAC (adoption)	N/A – pending endorsement
Discussion Paper on Nitrogen Factors	39 CAC (Adoption of amended section 7.4)	N/A – pending endorsement
Code of Practice for Fish and Fishery Products (Optional Final Product Requirements for Commodities/Appendix on MAP)	39 CAC (Adoption of amended section 11)	N/A – pending endorsement
Discussion Paper on Histamine	New work/eWG	Actively participate in the eWG and, if convened, pWGs.

## **Agenda Item 2a – Matters Referred**

*Associated CRD(s) – 8*

Discussion on food additives was deferred for discussion under the relevant agenda item.

### *Codex Strategic Plan 2014-2019*

The Committee considered the template for monitoring and implementing selected activities as prepared by the Codex Secretariat and agreed that the selected activities were relevant to CCFFP

### *Sampling Plans in Standard for Fish and Fishery Products*

The Committee considered the sampling plans proposed by CCMAS and accepted all bar the sections for parasites. These were not considered appropriate with respect to acceptance number and acceptable quality limit (AQL) as per the recommendations in General Guidelines on Sampling CAC/GL 50-2004. The main point of concern revolved around whether the aspect was a critical or no-critical aspect.

<i>Action points for SafeFish</i>	<b>Discuss specifics of outcome with the Australian delegation for CCMAS</b>
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## **Agenda Item 2b - Matters Arising from the Work of FAO and WHO**

*Associated CRD(s) – Nil*

Information was presented and noted by the Committee.

<i>Action points for SafeFish</i>	<i>Nil</i>
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## **Agenda Item 3 – Draft Code of Practice for the Processing of Fish Sauce**

*Associated CRD(s) – 6, 13, 15, 19, 21*

CRD 6 was used as the basis for discussion in plenary. Following discussion, this item was progressed to Step 8 for adoption by the Commission. Good progress was made on this document and no interventions by Australia were required.

<i>Action points for SafeFish</i>	<i>Nil</i>
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## **Agenda Item 4 – proposed Draft Code of Practice on the processing of Fresh and Quick Frozen Raw Scallop Products**

*Associated CRD(s) – 2, 4, 13, 15, 16, 17, 19, 25.*

This was a key agenda item for Australia and was preceded by an electronic working group (eWG), a physical working group (pWG) (refer CRD4) and an in-session working group (Refer CRD25). Australia attended and actively contributed in all working groups.

Discussion during plenary were based on both CRD4 and CRD25.

Definitions for roe-on scallop meat, and scallop meat were adopted from the Standard for Fresh and Quick Frozen Raw Scallop Products (Codex Stan 315-2014).

The Committee confirmed the importance of hazard analysis for informing control measures suitable for risk management of biotoxins in scallop products, including roe-on and roe-off products.

Technical guidance was given around the handling of scallops showing evidence of death and damage. The Standard for processing Fresh and Quick Frozen Scallop Products prevents handling of dead scallops, and this was reflected throughout the Code of Practice, at both scallop landing and reception in processing premises. Some countries questioned the need to repeat this process twice for short haul vessels where biotoxins were not identified as an issue, however the consensus was to retain the two steps from removal of dead scallops.

<i>Action points for SafeFish</i>	<i>Distribute finalized Standard and Code of Practice to regulators and the scallop industry in Australia</i>
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**Agenda Item 5 – proposed Draft Code of Practice for Fish and Fishery products (Section on Sturgeon Caviar)**

*Associated CRD(s) – 3, 5, 14, 15.*

This item was preceded by a pWG (refer CRD5). As Australia does not produce sturgeon caviar, and as a review of the draft document did not reveal any significant issues, Australia did not attend the pWG.

Discussion during plenary was based off CRD5. Following discussion, this item was progressed to Step 5/8 for adoption by the Commission. Good progress was made on this document and no interventions by Australia were required.

<i>Action points for SafeFish</i>	<i>Nil</i>
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**Agenda Item 6 – Proposed Food Additive Provisions in Standards for Fish and Fishery Products.**

*Associated CRD(s) – 9, 19, 20, 21, 23, 24.*

Discussion during plenary was based off CRD24, the report from an in-session working group during which 12 recommendations were made.

It was clarified that the mandate of the in-session working group was to review any outstanding issues to correct inconsistencies/inaccuracies in the relevant standards for fish and fishery products and not to reconsider any previous decisions made by CCFFP.

As per previous sessions, significant progress was made in relation to the review of food additive provisions in existing fish and fishery product standards, with agreement being reached during plenary on all additives which were subject to review.

While not within the scope of the work being completed during this session, the delegation of the United States raised a concern about the revocation of the permissible use of Sodium Aluminum Phosphate (INS 541) in the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets Breaded or in Batter (CODEX STAN 166-1989). The delegation of the United States advised the Committee that Sodium Aluminum Phosphate is a commonly used raising agent (baking soda).

Noting previous discussion and agreement by the Committee on this issue (CCFFP33), the matter was not reopened; however, it is likely that the delegation of the United States will seek an opportunity to have this issue discussed at CCFA. Should this occur, Australia could support the position of the United States.

<i>Action points for SafeFish</i>	<i>Nil</i>
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**Agenda Item 7 – Discussion Paper on Nitrogen Factors**

*Associated CRD(s) – 10*

*Section 7.4*

The Committee agreed to an amendment to Section 7.4 of the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets – Breaded or in Batter (CODEX STAN 166-1989), noting the importance of the method for verification of the fish content declared on the label but recognising that confirmation was not required for fully cooked products. The Committee also agreed to remove the table on average nitrogen factors and replace it with a link to the FAO website (the FAO previously agreed to manage (e.g. update) and make this table available on their website).

*Draft Uniform Procedure to Determine Nitrogen Factors*

In relation to the development of a uniform procedure to establish nitrogen factors, the Committee agreed that this should occur outside of the Codex process and agreed that the FAO was best placed for this work. The Committee further provided guidance to the FAO in relation to the request being made.

<i>Action points for SafeFish</i>	<i>Nil</i>
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**Agenda Item 8 – Code of Practice for Fish and Fishery Products (Optional Final Product Requirements for Commodities/Appendix on MAP)**

*Associated CRD(s) – 18*

Noting that many if the appendices are considered to be optional trade requirements and therefore should not be a part of Codex text, it was agreed that further work on Appendices II –XI should not occur but that the information should be made available on the FAO GLOBEFISH website if applicable.

In relation to Appendix I (Modified Atmosphere Packaging (MAP)), the Committee acknowledged the importance of providing guidance on MAP for seafood products, but also noted that MAP is not unique to seafood. It was therefore agreed that any new work on guidance on MAP should be made by interested countries to CCFH.

<i>Action points for SafeFish</i>	<i>Monitor the workplan of CCFH and actively contribute to any work which may be undertaken in relation to MAP.</i>
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## **Agenda Item 9 – Discussion Paper on Histamine)**

*Associated CRD(s) – 11, 12, 22.*

This item was preceded by an eWG which Australia actively participated in. The eWG focused on four key areas: control guidance, susceptible species, safety limits and sampling plans.

During plenary, it was agreed that the following work needs to be undertaken:

- a) Revise the guidance in the different sections of the Code of Practice for Fish and Fishery Products, including revising the list of susceptible species. Note: there was general consensus that salmon be removed from the list.
- b) Revisit the safety limits when further knowledge and information becomes available. Note: in the meantime, both of the current limits (decomposition and safety) would be maintained.
- c) Consider other biogenic amines only once more evidence becomes available.
- d) Develop sampling plans.

It was also broadly agreed that the issue of histamine should be considered as a whole and the work on guidance and control measures and sampling plans should not be separated.

Once agreement on what is required was achieved, the discussion during plenary shifted to the most appropriate Committee to undertake the work. Some delegations considered that CCCF was best placed, while others (including the Secretariat) advocated that the CCFH was the most technically applicable Committee. However, after interventions from a number of largely third world nations (led by Morocco), it was agreed that CCFFP would remain responsible for taking the work forward.

In order to address the action points outlined above, the Committee agreed that a proposal for new work needed to be submitted to CCExec and CAC and, pending endorsement, an eWG co-chaired by Japan and the United States should be convened. It was also agreed that, if necessary, the work could be supplemented by a pWG.

The proposed basis for new work was agreed as follows:

- a) Develop more specific guidance in the Code of Practice for Fish and Fishery Products, and include a revised list of susceptible species.
- b) Provide necessary alignment of the sampling plans across the relevant standards for fish and fishery products, acknowledging that the FAO/WHO histamine sampling tool provides a sound basis for further development and CX/FFP 15/34/10 and discussion during plenary of CCFFP34 is a good source for further work.
- c) Elaborate sampling plans for different purposes, bearing in mind that when sufficient safety control measures are implemented through the entire chain and are demonstrated as effective, then increasing the sample size does not necessarily increase accuracy nor improve the safety of the products. Sampling plans must be risk-based, practical, feasible and not add unnecessary burden to producers.

<i>Action points for SafeFish</i>	<i>Support the proposal for new work and actively participate in the eWG/pWG.</i>
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## **Agenda Item 10 – Other Business and Future Work**

*Associated CRD(s) – Nil*

### *10 (a) – Proposed New Work on a Standard for Fresh Chilled Pirarucu Fillet of Whole Fish*

Due to the absence of any documented work proposal, the Committee agreed to discontinue consideration of this matter. Should it be raised in the future, and should it be determined that a specific standard is required, Australia should recommend that the standard be developed through the relevant regional Codex Committee (CCLAC).

### *10 (b) – Future of the Committee*

As a result of completing or referring to other Committees all but one piece of work on the agenda for the Codex Committee on Fish and Fishery Products (CCFFP), it was agreed during this session to suspend physical meetings and, where needed, work by correspondence. In this regard, the Committee agreed to continue new work on histamine (refer Agenda Item 9) by correspondence; however physical working groups will be convened if required.

<b><i>Action points for SafeFish</i></b>	<b><i>Inform the delegation leaders of relevant horizontal Committees as well as CCExec and CAC of any concerns that may be raised.</i></b>
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## **Agenda Item 11 – Date and Place of Next Session**

Noting the discussion under Agenda item 10 (b), the Committee agreed to suspend physical meetings, noting that it would work by correspondence.