

EUROPEAN COMMUNITY COMMENTS ON

CL 2004/42-FFP

**Subject : Code of Practice for Fish and Fishery Products: Draft
Section on Aquaculture – Request for comments at step 6**

The European Community has the following comments on the above-mentioned code of practice:

Section 2 Definitions:

The definition of **chemicals** should be replaced by **contaminant** as defined in the *Codex Manual* (page 49) as: “*any substance not intentionally added to food, which is present in such food as a result of the production (including operations carried out in crop husbandry, animal husbandry and veterinary medicine), manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food or as a result of environmental contamination. The term does not include insect fragments, rodent hairs and other extraneous matter.*”

The definition of **residues** should be replaced by **residues of veterinary drugs** defined in the *Codex Manual* (page 51) as: “*the parent compounds and/or their metabolites in any edible portion of the animal product, and include residues of associated impurities of the veterinary drug concerned*”.

The definition of **withdrawal time** should be replaced by **Withdrawal Time and Withholding Time** defined in the *Glossary of Terms and Definitions* (Residues of Veterinary Drugs in Foods, CAC/MISC 5-1993, amended 2003, point 28, page 4) as: “*: This is the period of time between the last administration of a drug and the collection of edible tissue or products from a treated animal that ensures the contents of residues in food comply with the maximum residue limit for this veterinary drug (MRLVD)*”.

All definitions drawn from other Codex documents that are repeated in the *Code of Practice for Fish and Fishery Products* for transparency (e.g. also that of veterinary drugs from page 51 of the *Codex Manual*) should be accompanied by a reference to the source.

6.1.1. Site selection

The EC proposes the following amendments to the 2nd paragraph:

*The physical environment with regard to temperature, current, **salinity** and depth should also be checked since different species have different environmental requirements. **Closed recirculation systems should be able to adapt the physical environment to the environmental requirements of the farmed fish species.***

6.2 Identification of hazards and defects

The EC suggests the following amendments to the paragraph:

Consumption of fish and fishery products **can be** associated with a variety of human health hazards. Broadly the same hazards are present in aquaculture products as in corresponding varieties caught in the wild, (Section 4.1). The risk of harm from a particular hazard might be increased, under some circumstances in aquaculture products compared with fish caught in the wild - for instance **if the withdrawal time for residues of veterinary drugs has not been observed.** ~~the presence of residues of veterinary drugs.~~

High stocking densities, compared with the natural situation, might increase the risk of cross-infection of pathogens within a population of fish **and might lead to a deterioration of the water quality.**

6.3.1 Feed Supply and 6.3.2 Veterinary Drugs in the Aquaculture Section

The European Community supports the position of the 15th of the Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF, point 11, page 2 of ALINORM 05/28/31). The CCRVDF “recommended that the Committee on Fish and Fishery Products refers to the relevant Codes of Practice, instead of listing specific recommendations under the heading “Technical Guidance”. The Representative of the OIE underscored the importance of taking into account the work of the OIE Working Group on food safety that is preparing Good Farming Practices, which also includes aquaculture”.

Paragraph 6.3.1

The European Community would moreover like all items listed under the paragraph *Technical guidance* to be deleted. This is because they are more precisely addressed in the specific section on aquaculture of the Draft *Code on Good Animal Feeding*. If necessary for the sake of transparency reference should be made to the above-mentioned *Code on Good Animal Feeding*.

6.3.3 Growing

The EC would like to suggest the following amendments to paragraph 3 and suggests to add a new paragraph :

- *Diseased fish should be quarantined when necessary and appropriate and dead fish should be disposed **immediately** in a sanitary manner that will discourage the spread of disease and investigate cause of death.*
- *All equipment and holding facilities should be easy to clean and to disinfect and should be cleaned and disinfected regularly and as needed.*

6.3.4 Harvesting

The EC proposes the following amendments to the 2nd paragraph and suggests to add a new paragraph :

- *Live fish should not be subjected to extremes of heat or cold or sudden variations in temperature **and salinity.***
- *All equipment and holding facilities should be easy to clean and to disinfect and should be cleaned and disinfected regularly and as needed.*

6.3.5 Holding and Transportation

The EC proposes to add the following paragraph as under points 6.3.3. and 6.3.4.:

- *All equipment and holding facilities should be easy to clean and to disinfect and should be cleaned and disinfected regularly and as needed.*

6.3.8 Life fish stored and transported at low temperatures

- The EC proposes that the second sentence of the first paragraph: “*Conditioning is a biological operation to reduce the metabolic rate of fish minimising the stress to them.*” could be rather included in Section 2.2 “*Definitions*”.