

01/12/2004

**European Community comments on the
Proposed Draft Standard for Ready-to-Eat Smoked Fish
(CL 2004/43-FFP)**

General comments

The European Community (EC) supports in general terms the “Proposed Draft Standard for Ready to Eat Smoked Fish” and thanks the Committee and the Working Group led by Denmark for the work done.

This work is particularly welcomed in view of the increasing trade problems of smoked fish and in particular those affecting public health.

However, the European Community would like to submit the following comments:

2. DESCRIPTION

Point 2.1 Product Definition

- The smoked fish should be easily recognised by the consumer and therefore it is proposed: to complete the definition by adding the following wording: “*It should have smoked sensory characteristic*”

Point 2.2 Process Definition

- *Listeria* is one of the most important microbiological hazards in smoked fish. It may create sanitary problems, but it could also jeopardize the trade. Therefore, it is proposed to introduce a mention to *Listeria* in the last paragraph.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

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Point 3.1 The Raw Material

- In order to be consistent with the Draft Standard for Salted Atlantic Herring and Salted Sprat, the EC proposes to delete the term “*visibly*” between brackets in the second sentence.

Point 3.4 Liquid Smoke

- The EC would like to add to the existing text: '.....approved for food use.'

Point 3.6 Decomposition

- The EC agrees with the proposed text consistent with other fish Codex Standards and therefore proposes to delete the brackets and maintain the sentence.

5. HYGIENE AND HANDLING

Point 5.1 Codes of Practices

- The current version of recommended International Code of Practice – General Principles of Food Hygiene is CAC/RCP 1-1969, rev. 4, 2003.

Point 5.2 Microbiological criteria

- There is a mistake in the number of the Code referred in this point. It should be CAC/GL 21-1997 as CAC/RCP 21 (1979) is a document entitled Foods for Infants and Children.

Point 5.4 Parasites

- The presence of live parasites in fish may represent a risk for public health. Therefore the EC proposes the following wording for the first sentence:
- *“Smoke fish products shall not contain living parasites, which present a risk for human health (e.g. larvae of nematode).”*

6. LABELLING

Point 6.1.1 Name of the Food

- To be consistent with points 2.2 and 3.4, it is suggested to delete the brackets and maintain the sentence: *“Where liquid smoke is used it must be declared on the label.”*
- Point 6.2 Storage instructions
- To complete the sentence by adding the following words at the end: *“such as temperature and shelf life”*.
- Point 6.3 Labelling of Retail Packages
- The EC agrees in principal with the proposal and therefore would propose to delete the brackets. However EC reserves its final opinion and the possibility to require the inclusion of additional information in the labelling, as far as the present proposal for standard is being developed.

7. SAMPLING, EXAMINATION AND ANALYSIS

Point 7.4 Determinations of Dead Parasites

- To be consistent with the title of Annex IV it is proposed to change the wording of the title and in the paragraph: *“Determination of the presence of visible parasites.”*

8. DEFINITION OF DEFECTIVES

Defective serves to the acceptance of the lot as provided in point 9. Point 9 refers to the Codex Standard 233-1969 to define the total number of defectives which may make a lot acceptable or not.

Since point 2.1 of Codex Stan 233-169 provides “They are not intended however, to cover factors which may represent a hazard to health or which are unwholesome or otherwise highly objectionable to the consumer on the basis of which responsible authorities would reject the lot”, the EC proposes to only keep under point 8 those defectives affecting the quality and not the safety. Therefore:

Point 8.1 Microbiological defects

- should be deleted, and

Point 8.3 Parasites

- In order to be consistent with the Draft Standard for Salted Atlantic Herring and Salted Sprat (ALINORM 04/27/18, Appendix II), the EC proposes replacing the sentence by: “The presence of readily visible parasites in a sample of the edible portion of the sample unit detected by normal visual inspection of the fish flesh (see Annex 4).”

ANNEXES

It is proposed to include a new Annex related to *Listeria*, in the same line as the current Annex I related to *Clostridium*. This new annex should be drafted taking into account the conclusions of the CCFH on *Listeria*, or making a reference to decisions that CCFH may adopt in the future on the grounds of the outcome of the current work of the “CCFH Drafting Group on *Listeria*”.