

European Union Comments

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Thirty-fourth Session

Ålesund, Norway - 19 – 24 October 2015

Codex Circular Letter 2014/25-FFP

Request for Comments at Step 6:

Draft Code of Practice for Processing of Fish Sauce

Mixed Competence

Member States Vote

The European Union and its Member States (EUMS) would like to submit the following comments:

1st paragraph:

In general, the size of fish used as raw material in fish sauce processing is small, not greater than 12 cm in length. Traditional fish sauce fermentation relies on endogenous enzymes and indigenous bacteria of raw materials. For non-traditional fermentation parts of fish (by-products), other ingredients or processing aids may be ~~added~~ **used** to ~~assist~~ perform the fermentation process. Raw fish and parts of fish shall be in a good condition, suitable for human consumption.

Reason: Beside traditional fermentation of small whole fish species, it should be emphasized that for reasons of sustainability, parts of fishes (for instance by-products of other processing) can also be fermented with enzymes as processing aids.

The sentence added reflects the quality conditions stipulated in the Codex Standard for Fish Sauce¹.

1. Reception of raw materials

1.1 Fish

Potential hazards: histamine, microbiological contamination biotoxins, chemical contamination (including pesticides and veterinary residues), physical contamination, heavy metals

Reason: To align with the description of the technical guidance.

1.2 Salt requirements

- The size of the salt granules used should be carefully considered. Medium size salt crystal should used. ~~Use clean salt without contaminants~~. If small size salt is used, the outer skin of fish...

Reason: The sentence is redundant as under the first bullet point the Standard for Food grade Salt already includes this requirement.

¹ Section 3.1.1. Fish sauce shall be prepared from sound and wholesome fish or parts of fish in a condition fit to be sold fresh for human consumption.

2. Mixing of fish and salt

- ~~• Salt burn should be avoided by using right type of salt.~~

Reason: The last bullet point should be deleted because salt burn is already mentioned under 1.2. Salt requirements (last bullet point).

5. Brine preparation

Technical Guidance:

- Brine, preferably saturated, added to fish residues should be **freshly** prepared from potable water and food grade salt for succeeding extraction.

Reason: In general, food production requires clean and fresh ingredients. Due to the description “preferably saturated” the fresh preparation of brine should be a must.

12. Capping

Potential hazards: **unlikely**, residual chemical cleaning agents

Potential defects: loose plastic matter, broken caps, foreign matter

Technical Guidance:

- Caps should be **randomly and regularly** checked **for defects and cleanliness** before capping.
- After capping foreign matter should be checked.

Reason: For reasons of GMP also caps should be checked for defects and cleanliness as containers under point 11.

17. Ingredients and additives

Potential hazards: chemical, physical and microbiological contamination

Potential defects: depends on ingredient

Technical guidance:

- Ingredients and additives should be stored **in a clean place** appropriately in terms of temperature, humidity **and hygienic conditions**.
- ~~• Ingredients and additives should be stored in a dry and clean place under hygienic conditions.~~
- Ingredients and additives should be properly protected and segregated to prevent cross-contamination.
- Defective ingredients and additives should not be used.

Reason: To simplify the technical guidance.