

19 September 2017

**European Union comments on
Codex Circular Letter CL 2017/70-FH:
Proposed draft guidance for histamine control in the *Code of Practice for Fish
and Fishery Products* (CAC/RCP 52-2003) (at Step 3)**

*Mixed Competence.
European Union Vote.*

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

Specific Comments

X.4.1 Reception (processing establishment)

- If fish are delivered directly from the fishing vessel to the processing establishment, then refer to Section X.2 Reception (receiving establishment).
- If fish are delivered by transport vehicle or vessel, then refer to Section X.3 Transportation.
- If the processing establishment is a secondary processor receiving product from a primary processor (e.g. receiving establishment or factory vessel), then the secondary processor should ensure that the primary processor uses HACCP ~~or a similar control system designed to prevent formation of hazardous levels of histamine.~~
- When it is impractical for the initial receiving establishment to conduct all the appropriate histamine controls listed in subsection X.2 (i.e. vessel records review, temperature monitoring, sensory evaluation, and histamine testing), then the processing establishment should conduct these activities, and should ensure that the controls and decisions are applied to intact fishing vessel lots that are not comingled with other lots. However, fish internal temperatures (and adequacy of ice, where applicable) should always be monitored at vessel delivery (to evaluate vessel control), as well as at the processing establishment (to evaluate transport control).

Rationale

The notion of similar control system is not defined in the document; a receiving establishment or a factory vessel should have in place a control system based on HACCP.

Editorial Comment:

The link in the **footnote 7** should be corrected. The correct form is:
<http://tools.fstools.org/histamine/>.

