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**European Union Comments**  
**CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS**  
**Thirty-third Session**  
**Bergen, Norway, 17 – 21 February 2014**

**AGENDA ITEM 7**

**PROPOSED DRAFT CODE OF PRACTICE FOR FISH AND FISHERY  
PRODUCTS (SECTION ON STURGEON CAVIAR)**

(At Step 3 of the Procedure)

**Prepared by the Electronic Working Group led by Iran**

*Mixed Competence.*

*Member States Vote.*

The European Union and its Member States (EUMS) would like to thank Iran for having chaired the electronic working group and would like to submit the following comments:

**GENERAL COMMENTS:**

The EUMS consider it essential to align the provisions of the Code of Practice with all relevant Codex texts, and in particular with the Standard for Sturgeon Caviar (CODEX STAN 291 – 2010). Therefore, discussions on definition for caviar should not be re-opened as they already exist in the Standard for Sturgeon Caviar (CODEX STAN 291-2010). Consistency with the Standard in relation to the use of hormones should also be ensured.

**DEFINITIONS:**

As mentioned in the general comments, the EUMS consider that it is not necessary to include any definition on caviar or fish eggs in the Code of Practice since these definitions are already included in section 2.1 of the Standard (291-2010).

**Extra pure food grade salt**

The proposed definition is not in line with the Standard for Sturgeon Caviar (CODEX STAN 291-2010), where section **3.2 Salt** reads:

“Salt shall be of food grade quality and conform to all applicable Codex Standards”. The Standard for Food Grade Salt (CODEX STAN 150-1985) in **section 3.1** Minimum NaCl content reads: “The content of NaCl shall not be less than 97% on a dry matter basis, exclusive of additives”.

Therefore, the EUMS propose deletion of the definition of “Extra pure food grade salt”.

As a consequence section X.11 Ingredients reception would need to be amended.

## **GENERAL CONSIDERATIONS:**

### **2<sup>nd</sup> Paragraph:**

For the sake of clarity and in order to align the text with the provisions of the existing Standard for caviar, the EUMS propose to replace the second paragraph with the following text:

~~This section applies to caviar production from sturgeon fish both by slaughtering [and by extracting the eggs after ovulation (without slaughtering the sturgeons; allowing multiple harvests). Ovulation can be induced by releasing factors (synthetic or natural), naturally by homogenates/lysates of carp or sturgeon pituitary gland containing these factors and/or environmental means to trigger natural hormone release from the fish brain under appropriate conditions (light/temperature).]~~

~~“This section applies to sturgeon caviar production, both by slaughtering of the sturgeon and also by induction of ovulation by natural means as well as by the use of authorized products”~~

### **3rd paragraph**

The EUMS would also like to propose **deletion of third paragraph** of the general considerations.

~~“Caviar is produced traditionally using basic practices which have never been mechanized due to the sensitivity of the product and the depletion of wild sturgeon stocks. The use of advanced complex machinery has been less popular for caviar production due to the simplicity of caviar production.”~~

### **4<sup>th</sup> paragraph**

The EUMS would suggest to clarify the **4<sup>th</sup> paragraph** since it is indicating that “there is also no step which eliminates microorganisms (e.g. thermal processing)[...]” but there is a special point relating to pasteurisation in X.19. Thus, the use of pasteurisation should be clarified further (by indicating that it is not often used since it is likely to change taste and flavour but still, remains an option).

## **Chemical hazards:**

The EUMS propose to eliminate "...*case of farmed fish*". The amended text would read as follows:

"Contaminants such as heavy metals, pesticides, oil derivatives, residues of veterinary drugs *in the case of farmed fish* need to be considered...."

## **X.1 Fish reception**

**4<sup>th</sup> bullet point** should be deleted as dead fish should not be used.

~~*'In case of fresh (non-live) fish, sensory evaluation charts and tables should be accessible at fish reception sites according to section 8.1.1.1 (Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003)) and the person who receives the fish should assess the fish accordingly and dispose of the unacceptable fish'*~~

## **X.2 Fish storage**

The 3<sup>rd</sup> bullet point of this section should be placed under section X.3 Slaughter. The EUMS would also like to propose an amendment to the text of this bullet point as there are different methods for stunning, not only the use of voltage. The final text would read as:

Stunning may be used to reduce stress after fish are harvested. It should be done by a skilled person *using appropriate voltage that would in order* not *to* damage the fish or eggs

## **X.6 Laying induction**

The EUMS suggest deleting the square brackets and keeping the text as drafted.

## **X 7 Anaesthesia for big fish**

The EUMS propose to remove the brackets and to maintain the section as drafted.

## **X.8 Micro caesarean, roe vacuuming or hand stripping - Potential hazards**

The wording "*roe vacuuming*" (used as synonym for hand stripping) should be eliminated as it could give the wrong impression of a mechanical suction of the roe.

~~*"Micro caesarean, roe vacuuming or hand stripping - Potential hazards"*~~

## **X.9: Treatment of eggs with shell improving methods**

The EUMS support deletion of the square brackets and to maintain the section as drafted.

## **X.11 Ingredients reception**

**Technical guidance, fourth bullet**

“Salt that is used for caviar processing should be extra pure food grade salt (99,9 % pure sodium chloride) with minimum impurities such as magnesium and calcium. These elements affect the taste of the caviar and the penetration of sodium chloride into the eggs.” is not in line with the Standard for Sturgeon Caviar (CODEX STAN 291 – 2010), and the Standard for Food Grade Salt (Codex Stan 150 – 1985).

The EUMS are not aware of any food safety issue related to impurities in caviar and we consider that this Code of practice is not the right document to consider this issue, in particular taking into account that the Standard for Food Grade Salt was recently updated.

Therefore, the EUMS propose the following amendment:

- “Salt ~~that is~~ used for caviar processing should be ~~extra pure~~ food grade salt (~~99,9% pure sodium chloride~~) with ~~minimum impurities such as magnesium and calcium.~~ ~~These elements affect the taste of the caviar and the penetration of sodium chloride into the eggs.~~”

## **X.20 Weighting and labelling**

The EUMS consider that the country of origin should be included in the labelling since it is important information for the consumer and its omission could mislead or deceive the consumer. The text proposed would read as follows:

***“Technical guidance:***

- *Information printed on the labels should be in compliance with General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985) and The Standard for Sturgeon Caviar (CODEX STAN 291-2010). **The country of origin shall be labelled.**”*

## **X.23 Repacking**

Editorial comment: *See section X.~~19~~**18.***