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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 12

Request for Comments: Appendices for Optional Final Product Requirements for Commodities in the Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003)

(Codex Circular Letter CL 2013/27-FFP)

*Member States Competence.
Member States Vote.*

The Member States of the European Union and its (MSEU) would like to submit the following comments on the appendices:

GENERAL COMMENTS:

Before the CCFFP agreed to transfer these Appendices to the Code of Practice, they were an important part of the Standards for fish and fishery products to describe in detail quality aspects. From the MSEU point of view, these quality parameters and characteristics for fish and fishery products are particularly relevant. Therefore, the MSEU consider that the Appendices should be retained and completed, as required, because they are an important tool for international trade. The MSEU believe that if these special quality requirements in fishery products are not retained, trade problems may arise because different countries may have different quality concepts about certain fishery products.

Many countries and particularly developing countries rely on Codex Standards and related texts to produce safe and high quality fish and fishery products. For example, about 50 % of the seafood exported to USA, Japan and EU is from developing countries.

SPECIFIC COMMENTS:

APPENDIX III – OPTIONAL FINAL PRODUCT REQUIREMENTS - FRESH, FROZEN AND MINCED FISH

In point 1.1 (Quick Frozen Finfish, Uneviscerated and Eviscerated) the dehydration of the surface should be taken into account by analogy to points 1.2 and 1.3 (Quick Frozen Fish Fillets or Quick Frozen Blocks of Fish Fillet, Minced Fish Flesh and Mixtures of Fillets and Minces Fish Flesh).

The MSEU suggest adding the following:

"Moderate Dehydration

A loss of moisture from the surface of the sample unit, which is colour masking, but

does not penetrate the surface and can be easily removed by scraping.

Over 10% of the total surface area or Pack Size Defect Area:

- a) <200 g units >25cm²
- b) 201-500 g units >50cm²
- c) 50 i - 5000 g units > 150cm²
- d) 5001-8000 g units >300cm²
- e) 8000 g units >500 cm²

APPENDIX IV – OPTIONAL FINAL PRODUCT REQUIREMENTS -FROZEN SURIMI

1.1.1 Moisture

The unit of the Pre-dry weight in the denominator should be expressed in [g]. The moisture parameter should be multiplied by 100 in order to express it as a percentage.

Pre-dry weight (g) - Alter-dry weight (g)

$$\text{Moisture (\%)} = \frac{\text{Pre-dry weight (g)} - \text{Alter-dry weight (g)}}{\text{Pre-dry weight (g)}} * 100$$

1.2 Cooked Surimi Gel Tests

1.2.1.1 Puncture Test

There are two additional methods, which may be used in determination of surimi quality.

1. The Compression Test, commonly used in surimi industry, conducted with the Texture Analyser apparatus.

The test measures the gel strength and deformability of the sample of surimi gel using a spherical pin of which the diameter is 5 mm and gives the penetration force in g and the deformation in mm at breakage.

Typical T.A setting product parameters:

Pre-Test Speed: 1,0 mm/sec

Test Speed: 1,1 mm/sec

Points per second: 500

Post-Test Speed: 10,0 mm/sec

Probe: P/5S: 5ram SP11F.RICAL STAINLESS

Distance: 15,0 mm

Load Cell Capacity: 5000g

Trigger Force: 20,0 g

2. Texture Profile Analysis (TPA) has been widely used in determination of surimi quality as well. There are many scientific articles describing usage of this test in the area of surimi production (list of selected research papers in the TPA Annex). TPA involves compression of the piece of food to 25% of its original height (75% of compression) two times in reciprocating motion. The textural attributes of hardness, cohesiveness, springiness, gumminess, chewiness and resilience were then calculated from the curve force-time.

2.1.4 Crude Fat Content

"S" in the denominator of the calculation of crude fat content should be expressed as weight of the sample taken (g), not quantity of the sample taken (g).

2.2.2.2 Expressible Moisture

The calculations of the expressible water and water holding capacity should be multiplied by 100 in order to express them as a percentage (See the comment to point 1.1.1).

APPENDIX V – OPTIONAL FINAL PRODUCT REQUIREMENTS -COATED QUICK FROZEN FISHERY PRODUCTS

The MSEU propose to replace in the second column of the table in the **Spanish version** the term "*peligro*" with "*defecto*".

APPENDIX VI – OPTIONAL FINAL PRODUCT REQUIREMENTS - SALTED FISH – [PART 1,ALREADY ADOPTED, REST TO BE COMPLETED)

Quality classification

Imperial / Superior - Fish without defects, according to a thorough description of defects mentioned in the defect list below.

Universal - Fish broken, amputee or with defects from a) to f) of the defect list below.

Popular - Fish with the characteristics of universal classification, but with a higher severity in the accepted defects.

Salted fish with defects listed from g) to o) is not fit for human consumption.

Definition of defects

- a) Split with amputations, with removal of the entire backbone of the fish or without removal of its anterior two-thirds;
- b) Deep cracks in the anterior two thirds of the fish, with depth corresponding to or exceeding half the thickness of the fish;
- c) Cracks not deep affecting more than 15% of fish in the area bounded continuously or more than one third of the total surface of the fish;

- d) Blood clots and blood spots or liver affecting more than 5% of the surface of the fish;
- e) Clavicular bone exposed, with tearing of the muscle;
- f) Excess of salt adherent to dried fish and or mucus in the dorsal, as a result of an inadequately washed or rinsing the wet salted fish;
- g) Deficient curing - when the ratio between the concentrations of sodium chloride and water in the tissue is less than 0.32 or greater than 0.37;
- h) Burning - fish showing sticky on the back side with disordered texture resulting from excess heat;
- i) Red - caused by the existence of halophilic bacteria;
- j) Dun - caused by the existence of halophilic mould clusters;
- k) Distinctly unpleasant smell, not characteristic of the species or the type of treatment;
- l) Unusual colouring - uncharacteristic colour stains or staining, around the fish, which is not due to the technological process of manufacture;
- m) Ressoado - defective conservation fish resulting from deficient storage temperature and aeration, which causes the rotting of fatty tissue with total disorganization of the texture of the fish - looks cooked;
- n) Presence of foreign matter;
- o) Visible parasites.

The MSEU consider that the proposed defects are precise, objective and simplify the understanding and the limits to the operators.

APPENDIX VIII – OPTIONAL PRODUCT REQUIREMENTS - LOBSTERS AND CRABS

The MSEU propose the following amendment in the **Spanish version**. In the first column of Quick Frozen Lobsters section it is suggested to replace “*peligro*” by the word “*defecto*”.

APPENDIX XI – OPTIONAL FINAL PRODUCT REQUIREMENTS CANNED FISH

2. Canned sardines and sardine-type products

Recommended defect description in the field of appearance " (vi) *The packing medium is not of normal colour and consistency for the type*" is not clear. Maybe it should be expressed as "*The contents of the can/container ...*"