#### **Additional**

# **European Union Comments**

## CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

# **Thirty-fourth Session**

Ålesund, Norway - 19 – 24 October 2015

# Agenda Item 4: PROPOSED DRAFT CODE OF PRACTICE ON THE PROCESSING OF FRESH AND QUICK FROZEN RAW SCALLOP PRODUCTS (CX/FFP 15/34/5) - at Step 3 of the Procedure

Mixed Competence Member States Vote

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

# Presentation / Formatting of the Code

The EUMS recognise the merits of a single flow diagram (Figure X.1) but due to the volume of information presented there is potential for confusion especially for practitioners new to scallop processing.

The EUMS consider that two separate flow diagrams showing 'shucking at sea' and 'shucking on land' separately is preferable for clarity and ease of use of the Code. Although this would make the document longer and repetitive, we believe clarity should take precedence over brevity for users of the Code (see attached diagram, as starting point, which we understand was discussed by the scallop e-WG).

## X.2.1.1 Scallop Landing/Deck Dump (Processing Step 1)

The EUMS support deletion of the square brackets and keeping the term "live" in the second and third bullet points subject to the maintenance of the text in the sixth bullet point "Scallops showing evident signs of death or damage should be disposed of in a proper manner. Unfit scallops can be identified through sensory evaluation, covering characteristics such as shell gaping, lack of response to percussion, sour odour, and/or viscera exposed outside the shell, picking of muscle or mantle, evident signs of decomposition, or other effective methods to assess viability".

The proposed final text would read as follows:

- •Refer to Section 7.3 Harvesting and transportation of live bivalve molluscs of the Code of Practice for Fish and Fisheries Products
- •For at-sea shucking voyages, {live} scallops should be collected and placed in clean storage containers made from material that is easy to wash and disinfect and that is

suitable for contact with seawater, without undue delay and with care to avoid contamination.

- •For short haul voyages [live] scallops should be collected and placed on deck or clean work surface to allow for washing of scallops. This should be carried out without undue delay and with care to avoid contamination.
- •To reduce stress and increase longevity, provide shade, seawater spray, or quickly transfer to a chilled environment to minimize the time scallops are exposed to elevated temperatures and dry conditions.
- •Clean seawater must be used and surfaces should be clean and impervious.
- •Scallops showing evident signs of death or damage should be disposed of in a proper manner. Unfit scallops can be identified through sensory evaluation, covering characteristics such as shell gaping, lack of response to percussion, sour odour, and/or viscera exposed outside the shell, picking of muscle or mantle, evident signs of decomposition, or other effective methods to assess viability.
- •Rough handling of live scallops should be avoided to minimize stress and injury which could lead to the death of scallops prior to processing.

# X.2.1.3 Shucking (Processing Steps 3, 21)

# X.2.1.4 Washing (Processing Steps 4, 22)

The EUMS would like to propose that for clarity and ease of use of the Code the text for Steps 21 and 22 should be included in the text according to the flowchart in order to differentiate 'shucking at sea' and 'shucking on land'. Although the text would be duplicated and this would make the document longer and repetitive, the EUMS believe that clarity should take precedence over brevity for users of the Code.

## X.2.2 Shucking on land

The EUMS support deletion of the square brackets and keeping the term "live".

This section covers the handling and storage of [live] whole scallops on board short haul harvesting vessels where shucking is done in the land based processing facility. The common steps for harvest vessel operations and subsequent land based processing for scallops shucked on land are shown in the right branch of the example flow diagram (Figure X.1). [Drafting note – On this second sentence, we suggest that this may need to be reviewed if it is agreed that a separate flow diagram (e.g. Figure X.2) is prepared for 'shucking on land' for clarity and ease of use of the Code.]

#### X.2.3.1 Reception (shucked scallops) (Processing Step 8)

The EUMS suggest an 'editorial comment' on bullet 3 that the words 'under development' should be deleted as the Scallop Standard has now been agreed. The same editorial comment on deleting 'under development' applies to the first bullet of X.2.3.4.

## **New X.2.3.3 Shucking (Processing Step 21)**

See previous comments from EUMS for sections X.2.1.3 and X.2.1.4 If this comment is accepted subsequent heading numbers should be reviewed.

Potential Hazards: Physical contamination, marine biotoxins in viscera and roe; microbiological contamination

Potential Defects: Remaining viscera; remaining roe (in the case of Scallop Meat); dead or damaged scallops, foreign matter, cuts and tears in the flesh

#### Technical Guidance:

- •Refer to Section 7.8 Shucking of the Code of Practice for Fish and Fisheries Products.
- •Scallops should be shucked as soon as possible.
- •For at-sea shucking voyages, dead scallops observed during shucking should be disposed of in a proper manner because the time of death is unknown and the quality of the meat and roe may be unacceptable. Dead scallops can be identified through sensory evaluation, covering characteristics such as shell gaping, lack of response to percussion, sour odor, and/or viscera exposed outside the shell, picking of muscle or mantle, or other effective methods to assess viability. [EUMS comments: this bullet would not be transferred here (from step 3) as 'processing step 21' relates to 'shucking on land'only and this bullet is about 'at sea shucking'.]
- •For Scallop Meat, care should be taken to ensure that the viscera and roe are completely removed in order to reduce the risk of contamination with biotoxins and pathogens associated with the viscera.
- •For Roe-on Scallop Meat, care should be taken to ensure that the viscera is completely removed.
- •Care should be taken to insure that worker's hands, shucking tables, containers, and knives are properly cleaned and sanitized.
- •Workers should be trained so as to avoid damage to scallops.
- •The shucked scallops should proceed immediately to the next steps to minimize their exposure to ambient temperatures above 4°C.

The EUMS would like to propose that a **Washing Step is added** as reflected in the diagram.

See previous comments from EUMS for sections X.2.1.3 and X.2.1.4 Washing

## X.2.3.4 Washing (Processing Step 22)

We suggest repeating text from Washing 'processing step 4' here for the same washing steps undertaken under 'shucking on land' operations (i.e. Step 22).

## X.2.3.5 3 Chilled Storage (Processing Step 23)

Subsequent heading numbers should be reviewed.

Potential Hazards: Microbiological contamination

Potential Defects: Decomposition

#### Technical Guidance:

- Refer to Sections 7.6.5.2 Storage of raw bivalve molluscs and 8.1.2 Chilled Storage of the Code of Practice for Fish and Fisheries Products.
- Stock rotation schemes should be used to ensure proper utilization of the scallop products. For scallops packed in containers, their identification tag facilitates the determination of the harvest date.
- Products should be stored between 0°C and 4°C. The temperature should be monitored during chilled storage.
- Product should be stacked in a manner that would facilitate adequate and uniform temperature distribution to all parts of the stored product.

