

European Union comments

CODEX COMMITTEE ON FOOD HYGIENE

Forty-eighth Session

Los Angeles, California, United States of America,

7-11 November 2016

Agenda Item 6:

Proposed Draft Guidance on Histamine Control and Sampling Plans for Histamine

*Mixed Competence
European Union Vote*

The European Union and its Member States (EUMS) congratulate Japan and the United States for leading the electronic working group and for the work carried out on the guidance on histamine control and on the sampling plans for histamine.

The EUMS would like to submit the following comments on the recommendations made to CCFH.

RECOMMENDATION 1: Approach to revision of Code of Practice for Fish and Fishery Products.

The EUMS agree with the recommendation. The EUMS suggest and support drafting a single document (new annex or section).

The EUMS suggest that when in the different sections of the Code of Practice for Fish and Fishery Products (COP) a reference to this hazard is made, it should be indicated that a dedicated specific guidance is available.

RECOMMENDATION 2: Data in FAO/WHO Table of fish associated with scombrototoxin fish poisoning or high free histidine levels.

The EUMS agree with the recommendation and suggest removing from the table data on histidine levels, subject to great variations, annual production and market names.

As regards the fact that CCFH should discuss the purpose of inclusion of the table, and, depending on the purpose, the inclusion of Salmonidae should be decided, the EUMS agree with this proposal. It is questionable to keep the salmon species in the list for the purpose of the COP since the SFP-like symptoms that justified their inclusion to the list have been reported in one old publication (Bartholomew et al., 1987). This has never been published afterwards, which could suggest that, even if the mode of action has been

tentatively elucidated (not confirmed), it is not a major issue. Together with the fact that SFP-like outbreaks linked to Salmonidae consumption have never been published for more than 20 years, this supports the deletion of Salmonidae from the table.

RECOMMENDATION 3: Replace current Family lists in the commodity standards with reference to the FAO/WHO susceptible species list.

The EUMS agree to replace the existing susceptible species lists in the commodity standards with a reference to the new table of susceptible species that will be incorporated into the Code. The EUMS have no objections to locate the list (or applicable species in the list) as an annex in the applicable commodity standards, in addition to the Code.

RECOMMENDATION 4: Start histamine control guidance work first, followed later by work on sampling plans.

The EUMS agree with the recommendation.

RECOMMENDATION 5: Alternative sampling plans for different purposes.

The EUMS support the recommendation; in particular the EUMS recommend that before sampling plans are developed their purpose has to be clearly defined. Preference should be given to develop (a) sampling plan(s) which shall be included in the concerned commodity standards and whose purpose is to check compliance of an inspected lot with the provisions of the standard. Alternative sampling plans aiming at monitoring the proper functioning of established hygiene control programmes should be preferably placed in the Code of Practice for Fish and Fishery Products to avoid ambiguity in interpreting the commodity standard. Those alternative sampling plans must take into account what has been agreed at the last CCFPP as regards the decomposition limit and the safety limit.

The EUMS agree that if an alternative sampling plan purpose is agreed to, then Japan and the US should research and draft sampling guidance for this purpose, in addition to drafting guidance for the risk-based plan used to determine individual lot compliance with the commodity standard.

The EUMS support that only the purpose, and not a specific plan, is discussed before the EWG document is produced. CCFH work in this subject area should be scientifically sound and feasible to implement.