

AQUATIC ANIMAL HEALTH STANDARDS COMMISSION REPORT

USA COMMENTS

OCTOBER 2008

**CRITERIA TO ASSESS THE SAFETY OF AQUATIC ANIMAL PRODUCTS
DESTINED FOR HUMAN CONSUMPTION**

Comment: there needs to be an introductory paragraph providing some context for developing these criteria—mentioning the relevance to importing countries, the application of science- or risk-based approaches, how the disease status of receiving country may impact risk tolerance, and some cross-reference to various OIE Code or Manual chapters dealing with similar issues. In addition, clarity is requested as to the purpose for the focus on waste tissues as these are the parts that will not be consumed but discarded during processing.

1. The ~~aquatic animal~~ *aquatic animal* product is prepared and packaged ~~for direct retail trade~~ for human consumption;

AND

2. Includes only a small amount of waste tissues;

AND

- 3a. The ~~disease~~ *disease* agent is unlikely to be present in the waste tissues;

OR

- 3b. The ~~disease~~ *disease* agent does occur in the waste tissues but the processing (i.e. post importation such as cooking) to produce the final consumable product involves processes known to inactivate ~~and/or reduce~~ the ~~load of disease~~ *disease* agent:

- i) Physical (e.g. temperature, drying, smoking);

AND/OR

- ii) Chemical (e.g. pH, salting, smoking);

AND/OR

- iii) Biological (e.g. fermentation).

Rationale: Since *aquatic animal* and *disease* are defined within the *Code*, their use should be italicized.

In Point 1, there are many ways for a product, once it is prepared and packaged, to reach the point of human consumption. Retail trade is one way; however, movement through wholesale

markets and food service entities is also possible. The identified deletion would allow for alternative means by which aquatic animal products may reach the end consumer.

Under Point 3b., including the terms ‘and/or reduce’ is not consistent with the criteria used in assessing safety of imported aquatic animal commodities irrespective of country disease status.

General comment: The United States recommends that the chapter be further developed:

- There should be greater emphasis and explanation for assuring food safety (the Aquatic Commission may want to refer it to the OIE Working Group on Food Safety).
- Consideration may need to be given as to whether or not this chapter should address all products intended for human consumption, and not just those intended for retail trade, including wholesale products and products destined for reprocessing.
- Some context may need to be provided for what is meant by “small amounts” and “waste tissues”.