

September 2009

USA COMMENTS

CHAPTER 7.3.

SLAUGHTER OF FARMED FINFISH
FOR HUMAN CONSUMPTION

Rationale : As several countries use the term “fish” to apply to many species of aquatic organisms (including invertebrates), it is preferable if the term “finfish” were used throughout this chapter to remove any ambiguity. The revision suggested here is only for the title; additional revisions will be needed throughout this new chapter to ensure consistent use of the term “finfish. »

General comment for the entire chapter: Additional information is needed to address actual slaughter methods that precede processing.

In addition, although this new chapter addresses stunning methods that will result in rendering finfish unconscious, it does not address the actual slaughter process (killing) that precedes processing, which we believe should be included in this chapters.

...

Article 7.3.5.

Unloading, transferring and loading fish prior to slaughter

1. ...
2. ...
 - a) ...
 - b) ...
 - c) ...
 - d) ...
 - e) Where feasible, and when applicable, fish should be allowed to swim directly into a stunning device without handling to avoid handling stress.
 - f) ...

- g) There should be a contingency plan to address emergencies and minimise stress during unloading, transferring and loading fish prior to slaughter.

General comment suggesting that clarification is needed for Article 7.3.5., point 2g. We question which “emergencies” during unloading, transferring and loading fish prior to slaughter will need “contingency plans,” and, further, what might be included in these plans. Clarification is needed to remove any ambiguity and assure standard application of these new *Code* recommendations.

Article 7.3.6.

Stunning and killing methods

General comment : Practical stunning and slaughter approaches for small farmed finfish establishments need to be added. The new chapter, and in particular, this article, tends to emphasize sophisticated processes and procedures easily accommodated by large commercial farmed finfish establishments, but omits practical approaches for small establishments. Although Article 7.3.6, point 4 (Other stunning and killing methods) suggests that carbon dioxide or chilling may “result in poor welfare,” it is unclear what alternatives are being suggested for small farmed finfish establishments. Alternatives should be provided to assure small establishments can comply with any *Code* recommendations.