EUROPEAN COMMUNITY POSITION PAPER

Comments on the proposed draft revised recommended international code of practice for the processing and handling of quick frozen foods
(at Step 3)

(CL 2005/39-CAC)

Introduction

The European Community and its 25 Member States (ECMS) would like to thank the Codex Secretariat for the possibility to comment on the proposed draft revised recommended international code of practice for the processing and handling of quick frozen foods (Codex Circular letter CL 2005/39-CAC). The European Community and its Member States would like to make the following comments.

I. GENERAL COMMENTS

In respect of the specific questions posed in the CL document:

• The language taken from the Code of Practice for Fish and Fishery Products regarding Defect Action Point (DAP) is acceptable and should be helpful.

• The references in the draft Code to the Recommended International Code of Practice: General Principles of Food Hygiene (GPFH) and its Annex are sufficiently clear and adequately cover any concerns regarding safety. There is no need to add further references to safety in the text.

• The separation of safety and quality issues has improved the document.

II. DETAILED COMMENTS

Introduction

Where the words “essential quality” are used in reference to different Codex Product Standards, this is usually the codex terminology used in that standard (i.e para. 2.2 - definition of “defect” and “temperature abuse”; section 5 - para. 1). Therefore, in these cases, the term “essential” should be retained as it is linking the issue to “essential composition and quality factor” sections which is a standard title in most Codex Product Standards.

However, where the text is not referring to a section in another Codex Standard, the ECMS are of the opinion that the word “essential” may be deleted (i.e in para. 3 of the introduction).
1. Objective

- At the end of the first sentence the following words should be added at the end:
  "… and Defect Action Point (DAP) analysis."
  In order to take into account this measure which is very important for the quality of the products.

2.2 Definitions

- Definition of “cold chain”
  The definition is very much narrowed down to quick frozen foods as is stated at the start of 2.2: “for the purpose of this code only”. However, within such a narrow definition the word “slaughter” is not appropriate. Therefore it is suggested to widen the definition and remove the words “quick frozen”.

- Definition of “cold store”
  The same argument applies to cold store. A cold store can be a chiller store or a freezer store or both. It would be preferable to widen the definition rather than limit it to quick frozen foods.

3. Prerequisite Programme

- The first sentence should be supplemented as follows:
  "Prior to the application of HACCP and the optional use of a DAP analysis to any segment…".

3.1 Location

- The word "perishable" should be deleted, since finally all raw materials are perishable and it is not clear, how to differentiate between perishable and non perishable raw materials.

3.2.3 Cold Store Design

- In order to take into account the harmlessness of the materials in relation to food, it may be necessary to add "and chemical" after "physical damage".

3.3 Facilities

- The ECMS suggest, that under section 3.3 on Facilities, an additional point should be added after “3.3.3 Pest Control Systems”, to read:
  (new) 3.3.4 Maintenance Regimes
  “Proper maintenance and repairs of any damage to the cold store and its infrastructure should ensure that insulation and refrigeration performance is maintained (e.g. prevention of rust, etc.).”
3.5 Training

- It is suggested to revise the end of the sentence as follows:
  “…of good temperature control **for guaranteeing food safety** and maintaining **food** quality.”

3.6.2 Traceability/Product Tracing

- After the first bullet point, the ECMS suggest to expand the bullet point to cover product tracing for products that are unfit for human consumption:
  "…that may pose a risk to consumer health **or are unfit for human consumption** by appropriate…".

5.2 Processing before Freezing

- At the first sentence the ECMS propose to add the term “blanching”. The word “blanching” should follow the term “slicing”.

5.8 Transfer Points

- The second sentence of the first bullet point is useful in that it provides advice on minimising the time at ambient temperature during external handling of quick frozen foods. The ECMS suggest that it would be useful to retain this sentence as it is only a recommendation and not a mandatory requirement.

Annex 2

- The chart always envisages the same course of operations: packaging, casing, freezing, which does not correspond to the reality of the industry. Freezing in paperboards is increasingly rare; in the most cases, either freezing is carried out on the units of sale to the consumer (freezing by air blowing), or the product is frozen before packaging (freezing on plates, or freezing on fluidised bed or IQF). It is necessary that these practices used by a major part of the industry are envisaged in the chart, i.e.: freezing before conditioning, and freezing after conditioning. This would be translated as indicated below:

```
...                  ...                  Freezing
Packaging          Metal Detection          Packaging
Freezing           Cold Store               Cold Store
Cold Store
...
```
Table 2 of Annex 2

- The DAP limit for DAPs 11 to 14 should state “Product temperature warmer than –18°C”. This is consistent with the text used in the rest of the Code.

- In points 13 and 14 in the third column it is stated that the DAP limit is a “product temperature above -18°C”. However, the text allows a rise of 3°C during transport (on page 10) or 6°C during distribution to retail establishments (on page 10) within any limits set by national legislation (to note, the latter point is mentioned at 5.7). These permitted deviations should be mentioned in the table.

III. EDITORIAL CHANGES / TRANSLATION ISSUES / TYPING ERRORS

- Point 3.1.: “Processing facilities should be located so as...”

- Point 4.2.1. in the third line: marinading should be “marinating”.

- Point 5.4 (French version only): Au 2ème paragraphe, à la 2ème ligne l’expression « n’affecte pas à l’inverse la qualité du produit. », devrait être remplacée par : « n’affecte pas de manière défavorable la qualité du produit. ».

- Point 5.6 (proposed changed linked to a translation issue - from English to French): In paragraph 6: It is noted that in previous versions, only distribution to the retailers was mentioned. While the quick frozen foods are distributed in increasingly large quantities to various caterers, such as restaurants, hospitals, canteens; the phrase "catering establishments" was inserted in the first sentence. However, it remains too restrictive (in particular when translated into the French language). It would be preferable to say: "... to the retailers and to the end-users, such as the catering establishments should be carried out...".

- Point 5.7 (French version only): Au 3ème paragraphe, il conviendrait de remplacer « radiateurs » par « source de chaleur », ce qui correspond plus à la réalité (par exemple présence d’un four à proximité du meuble frigorifique).

- Rephrase the headings of Annex 1 and Annex 2: “each step should be analyzed in order to decide if a CCP is necessary”.

- Table 2 of Annex 2 and Transport and Distribution (point 5.6): the DAP limit for DAPs 11 to 14 should state “Product temperature warmer than –18°C”. This is consistent with the text used in the rest of the Code. Similarly, the first sentence of section 5.6 should read: “temperature of –18°C or colder.”

- Second bullet of point 1.1 of Annex 3: devise should be ‘device’.

- Fourth bullet of point 2.1.4 of Annex 3: freeing should be “freezing”

- Last paragraph of point 4 of Annex 3: should be bullet point 4 (starting with: “Only if the non-destructive product measurement is outside...”).