

The European Guide to Good Practice for Smoked Fishes and/or
Salted and/or Marinated
by ESSA (European Salmon Smokers Association)

MAC WG 3, 18.10.2018

The conclusion of the Polish Member- Polish Association of Fish Processors
PSPR

- The Guide will apply to salmon processing, where Poland is the largest processor and supplier, not only in the European Union but also globally.
- Historically France was the largest producer of smoked salmon but this has changed over the course of the last decade during which Poland has now a leading position.
- Volumes of the salmon processed daily and distributed globally by an average Polish plants, are times higher than in a average salmon plants in France usually supplying domestic markets.
- It is estimated that Poland has a total European market share in smoked salmon of approximately 35%.

2

- In the point of stiffening(part of the technological process) the Guide redefines existing "defrosted" labelling rules.

though

- Member States have already stated that there is no need for any other approach than the one already agreed, where the European food law imposes responsibility on the food business operators for ensuring the compliance with the legal requirements.
- All Polish comments (8) related to the ***stiffening as the technological processing step for slicing (NOT STORAGE)*** for **a big scale and big volume technological process** were rejected by ESSA.-"*as not in line with current EU legislation*" – (*namely French law*).
- ESSA set unilaterally, in the Guide, the time limit of maximum 96h for "technological " stiffening prior for slicing of a cold smoked salmon, and refused to have any discussion over this point.
- In result the Guide provides the guideline for request that if smoked product was kept stiffened, during the technological process, for more than 96 hours, prior to slicing, then it has to be labelled as "defrosted" and can not be labelled as "fresh" anymore.
- Practically- within the complex technological process of processing of the cold smoked salmon such time limitation can be reached only by the small scale production facilities.

3

Asking the EC for the bilateral consultations Poland highlighted its three points of concern:

- *If the current text of the Guide would be adopted, without removing specific labelling requirement included and forced by ESSA this will lead to breaking the general EU rule of the equal access to the EU market.*
- *If not being the collective outcome of the experience and cooperation of all EU industry the Guide cannot be regarded as The European one.*
- *The Guide will favour particular group of the EU processors against the others irrespectible of process safety and quality.*

After a bilateral consultations between Polish administration, industry and the EC (Health&Food Safety DG), prior to the meeting of the Standing Committee on Plants, Animals, Food and Feed, scheduled on July 3rd, both sides worked out, on June 25th, the good compromise text.

From: Paolo.Caricato@ec.europa.eu [mailto:Paolo.Caricato@ec.europa.eu]

Sent: Monday, June 25, 2018 9:56 AM

To: krystian.krolik@msz.gov.pl; Eric.Thevenard@ec.europa.eu

Cc: Słowik Piotr <Piotr.Slowik@mgm.gov.pl>; Agnieszka.Sobkiewicz@msz.gov.pl; Kołodziejczyk Monika <Monika.Kolodziejczyk@mgm.gov.pl>; SANTE-CONSULT-G4@ec.europa.eu

Subject: RE: Polish Comments on ESSA Guide.- request for a meeting

Dear Mr Krolik,

Thank you for your mail.

This is the text that ESSA will submit to its members.

We think that it is a good compromise and we are happy with the proposal (that reflects the legislation in force). I hope this will be supported by Poland.

Today we probably receive the agreement (or not) from ESSA members.

I will keep you informed

Regards

PC

1 Stiffening in a cold room

This is the most popular technology. After smoking or maturation, fish is placed in a cold room to reduce the temperature as rapidly as possible to approx. -7°C to -8°C. The fish is then transferred into a stabilisation room to allow the temperature of fillet to homogenize to approx. -11°C. Depending on the stiffening equipment and the objective of the stiffening temperature, related to the type of a slicer being used, the kinetics of stiffening will not be the same.

*Given the batch nature of the process, it is crucial that the core product temperature is reached and maintained **homogenously** homogeneity throughout the whole product.*

The technological time to achieve the best temperature is up to 24h.

Due to ~~Constraints linked to the organisation of work~~ (for examples situations such as week-ends/bank holidays), products may have to be maintained at stiffening temperature for some time, which should however be as short as possible. Stiffening temperature cannot be used for storage or transportation. ~~should also be considered as a business can maintain the products exceptionally in a cold room up to 96h.~~

Paolo Caricato
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The same day the compromise text was rejected unilaterally by ESSA. Recent text became even more restricted in this particular point of concern.

Od: "Paolo.Caricato@ec.europa.eu" <Paolo.Caricato@ec.europa.eu>
Temat: RE: Polish Comments on ESSA Guide.- request for a meeting
Data: 25 czerwca 2018 16:39:03 CEST
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Dear Mr Krolik,

We have just received from ESSA the comments from its members. They confirmed the importance for having in write the limit of 96 hours. The new sentence will be as follows:

1 Stiffening in a cold room

This is the most popular technology. After smoking or maturation, fish is placed in a cold room to reduce the temperature as rapidly as possible to approx. -7°C to -8°C. The fish is then transferred into a stabilisation room to allow the temperature of fillet to homogenize to approx. -11°C. Depending on the stiffening equipment and the objective of the stiffening temperature, related to the type of a slicer being used, the kinetics of stiffening will not be the same.

Given the batch nature of the process, it is crucial that the core product temperature is reached and maintained homogeneously throughout the whole product.

The technological time to achieve the best temperature is up to 24h.

Due to the organisation of work (for examples situations such as week-ends/bank holidays), products may have to be maintained at stiffening temperature for some time, which should however be as short as possible, less than 96 hours.

Stiffening temperature cannot be used for storage or transportation.

Taking into account that this is an industry guideline and that the content is not going against the EU legislation, we have nothing in contrary for proposing the above mentioned text to the MS for endorsement. I understand that the revision will be difficult to be accepted by Poland, however I hope you can endorse the guide and continue to discuss with ESSA for further improvements.

Regards

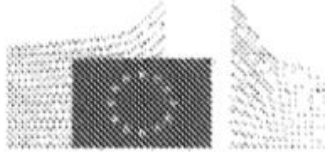
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European Commission
 Health & Food Safety Directorate General
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Current status, after July 3rd 2018.



EUROPEAN COMMISSION

Health and Food Safety Directorate General

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Standing Committee on Plants, Animals, Food and Feed

Section *Biological Safety of the Food Chain*

3 July 2018

CIRCABC Link: <https://circabc.europa.eu/w/portal/13617910-0f11-41e0-8ee0-8fec985e3c37>

SUMMARY REPORT

A.01 Presentation by ESSA (European Salmon Smokers Association) for a possible endorsement by the Member States of a European guide to good practice for smoked fishes and/or salted and/or marinated.

ESSA presented its guide that takes into account all the comments received from the Commission and the Member States. Poland asked to postpone the adoption as they are doing scientific studies to demonstrate the safety of the using the so called stiffening technological step (where the fish temperature is lowered at -10°C for allowing an easy cutting) for storing the products. Editorial comments from other Member States. The United Kingdom asked to take into account some comments presented. The guide was endorsed. Remaining comments will be taken into account before the publication.

Considering above, Polish member of the MAC is asking MAC Members for providing its recommendation, addressed to the EC and the Member States- members of the PAFF Standing Committee for amending the text of the endorsed Guide with the compromise text worked out by Poland and the EC on June 25th, 2018.

We believe that such act will be direct implementation of the one of the main principle of European co-operation and one of the principles which comes from the EU founding fathers - the equality between states and seeking the compromise.