



## SafeFish Update

October 2019 to April 2020 inclusive

The SafeFish Secretariat Executive Team has made the decision to cancel the meeting that was to be held at the Sydney Fish Markets on 03/04/2020 because of the unprecedented situation we are facing with the COVID-19 viral pandemic.

The Secretariat is currently working remotely; however please be assured that these arrangements have been assessed and tested, and usual operations will continue. We are conscious of the heightened need to reassure consumers of the safety of their food supply during this crisis and it is critical that SafeFish can continue to do this on your behalf. Any food safety incident associated with seafood food safety in the current climate would add to the consumer anxiety burden and be catastrophic for our industry.

The following information provides an update on the activities and major developments since the last partners meeting with a few items requiring your input/feedback as shown below:

- The likelihood of processors having x-rays or metal detectors in use and/or if these measures would be practical to implement to detect lead sinkers in products. – *see page 3 for more information.*
- FSANZ call for comment on food safety management tools for the food service industry – *see page 4 for more information.*

The Secretariat will determine if the meeting scheduled for July 24<sup>th</sup> will go ahead closer to the date based on how the pandemic develops.

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## **1. Codex update**

### **Upcoming Codex Meetings**

The Codex Secretariat, in agreement with the respective global host secretariats are rescheduling all upcoming sessions due to the COVID-19 pandemic. Sessions rescheduled currently include the Codex Committees on General Principles (CCGP), Pesticides Residues (CCPR52), Contaminants in Foods (CCCF), Food Import and Export Inspection and Certification Systems (CCFICS), Methods of Analysis and Sampling (CCMAS), Residues of Veterinary Drugs in Foods (CCRVDF), and the Executive Committee of the Codex Alimentarius Commission.

An announcement regarding the Codex Committee on Food Additives (CCFA), which has already been postponed once, will be made following further consultation with the host secretariat of CCFA, China. The status of the Codex Alimentarius Commission meeting (scheduled for 6-11 July 2020) will also be made soon.

However, SafeFish does not consider there are foreseeable or ongoing risk exposures for Australia's seafood industries as the result of these postponements. SafeFish will continue to monitor risks and exercise due diligence on behalf of partners and the industry.

### **Methylmercury – Maximum levels in other fish species and sampling plans**

Codex recently adopted maximum levels (MLs) of methylmercury in tunas, alfoncino, marlin and shark, and the Codex Committee on Contaminants in Food (CCCF) is currently in the process of considering MLs of methylmercury in Orange Roughy and Cusk-eels. The Codex Committee on Methods of Analysis and Sampling (CCMAS) has also endorsed the method of analysis for methylmercury, but did not endorse the sampling plans for methylmercury as originally proposed by CCCF. Further considerations on these topics are scheduled to occur during the 14<sup>th</sup> Session of CCCF (originally scheduled for 20-24 April 2020 – but currently postponed due to COVID-19).

SafeFish has been in correspondence with representatives from Austral Fisheries, Australian Longline, Tuna Australia, Australian Southern Bluefin Tuna Industry Association, Sarin Group, Tony's Tuna, South East Trawl Fishing Industry Association and Atlantis Fisheries Consulting Group on the developments. Austral Fisheries and Australian Longline have subsequently uploaded total mercury and/or methylmercury data in Patagonian and Antarctic toothfish to the international GEMS Food Contaminants database.

SafeFish was sponsoring Dr Hazel Farrell to join the Australian delegation and represent SafeFish at CCCF14. Dr Farrell has offered to help upload other mercury data and arsenic data into GEMS and this will occur over the coming months.

### **Lead sinkers and X-rays/Metal Detectors**

The Codex Committee on Contaminants in Food (CCCF) is reviewing the Code of Practice for the Prevention and Reduction of Lead Contaminations in Foods (CXC 56-2004). It has been proposed that seafood processing facilities can use metal detectors or x-rays to detect and facilitate removal of fish sinkers from fish.

This could be an unnecessary requirement given that most fish would be consumed after evisceration. Stakeholders are welcome to provide comment to the [SafeFish secretariat](#) on

how many processors they expect would have x-ray or metal detectors in place for other GMP/HACCP practices, and/or how necessary this measure would be to implement.

### **FSANZ – Review of Food Safety Management Tools**

FSANZ is currently reviewing all food safety management tools to strengthen food safety in the food service and closely related retail sectors. Retailers of RTE processed seafood products were identified as one of eight sectors where food safety management could be improved.

SafeFish notified processing representatives from Austral fisheries, Darwin Fish Markets, Decosti Seafood's, Ferguson's Australia, Melbourne Seafood Centre, Kailis, Mures, Raptis, Safcol, Samtass, Simplot Australia, and the Sydney Fish Market to advise them on the proposed changes and the current call for comment to provide feedback.

### **Korea SPS Notification – Revised maximum residual limits for antimicrobials in fishery products**

On 09 January 2020, the Republic of Korea issued a SPS notification (KOR673) that included its intention to review the maximum residual limit (MRL) of antimicrobials in fishery products. Information was disseminated through the SafeFish website, as well as included in the Seafood Trade Advisory Group February update (publication pending). An unofficial translation suggests that the limit of detection for veterinary drugs without established Korean MRLs will be reduced from 0.03 mg/kg to 0.01 mg/kg.

### **Korea SPS Notification – Revised limits for cadmium in squid**

On 01 October 2019, the Republic of Korea issued a SPS notification (KOR665) that included its intention to revise the maximum levels (ML) for cadmium in squid from 2.0mg/kg to 1.5mg/kg. The ML for cadmium in all other molluscs is to remain at 2.0mg/kg, excluding octopus (with viscera) that has an ML for cadmium of 3.0mg/kg. The amended provisions came into force on 1 March 2020. Information was disseminated through the SafeFish website and can be found by [clicking here](#), or feel free to contact the Secretariat for more details.

### **Vibrios in Seafood**

Japan and New Zealand are preparing a discussion paper for a review of *the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood (CXG 73-2010)*. The discussion paper is scheduled to be raised at the 52<sup>nd</sup> Session of Codex Committee on Food Hygiene (currently scheduled for November 2020). This follows a 2019 Joint FAO/WHO Expert Meeting on Microbiological Risk Assessment (JEMRA) meeting that reviewed and updated the existing risk assessment models/tools on *Vibrio parahaemolyticus* and *Vibrio vulnificus* in seafood. FAO/WHO have also recently released a 2010 meeting report on risk assessment tools for *Vibrio parahaemolyticus* and *Vibrio vulnificus* associated with seafood (report available at <https://apps.who.int/iris/handle/10665/330867>).

## Viruses in food

Canada and The Netherlands are preparing a discussion paper for the Codex Committee on Food Hygiene on the possible revision of *Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012)*. No additional information is available at the present time.

## 2. Project updates

### Vibrio risk reduction in bivalve molluscan shellfish

#### a) Workshop

Communication has been undertaken with the Tasmanian industry (most impacted by Vibrio illness), ASQAAC, and Dorothy-Jean McCoubrey (co-author of a recent NZ risk profiles for *V. vulnificus* and *V. parahaemolyticus* in NZ, and author of the Tasmanian industry guide to reducing risk of Vibrio growth in bivalve molluscan shellfish). A draft TOR has been developed to run a full day workshop in Tasmania, building on the industry guide. The workshop will be open to all Australian stakeholders. The Tasmanian industry is keen to leverage this by extending the consultant's tour to include visits to individual growing areas across the state, discussing practical approaches with growers in each area.

As part of the workshop, we will discuss potential regulatory interventions. Enrico Buenaventura, Section Head, Risk Assessment, Bureau of Microbial Hazards, Health Canada has agreed to participate in a live-link to discuss the implementation of new stringent standards on Vibrio numbers in bivalve shellfish in Canada. A Canadian industry representative will also be asked to participate to discuss the impact of these from an industry perspective.

Valeria Torok at SARDI has agreed to run a session on methods to detect and enumerate pathogenic Vibrio in association with the workshop. New Zealand researchers in Plant and Food Research Industries have been contacted and are also keen to participate.

The recent COVID-19 measures have called a halt to this process. The situation will be reviewed in June 2020. A further option is to combine the workshop with the annual ASQAAC meeting later in the year. There is also an opportunity to leverage this workshop at the national level to build ASQAAC policy on Vibrio, alongside the US Market Access proposal (see below).

#### b) Article in Communicable diseases

The Health Department of Tasmania has been contacted and an in-principle agreement established on publishing the recent cases of vibriosis. SafeFish would add to the publication by drawing in inter-state cases, and the developing risk of vibriosis from northern Australia as shellfish aquaculture is developed in these areas. Further work has been put on hold as the Tasmanian Health Department deals with COVID-19.

#### c) Liaison with OzFoodNet in each state to promote listing of vibriosis as a notifiable disease.

This action has been delayed until after COVID-19, as state epidemiologists will be highly involved in managing this pandemic.

## **Review of the microbiological standards relating to seafood in the FSANZ Food Standards Code**

Terms of reference for a consultant to assist with this review were developed and sent to four potential consultants. Dr. John Sumner was selected as the preferred candidate and contracted to complete the work. He has been speaking with industry and government stakeholders, and collating all the background documentation on domestic and international microbiological standards and guidelines relevant to seafood, in consultation with SafeFish and Seafood NZ.

A call for experts was released to attend a workshop in Melbourne on the 20<sup>th</sup> April 2020, and Wellington on the 21<sup>st</sup> April 2020. Expressions of interest to attend were received from 11 government representatives, 6 researchers and consultants and 9 industry representatives for the Australian workshop.

Unfortunately, the workshops have been postponed due to COVID-19, however the background document will still be distributed to the registered participants for comment in April 2020.

## **Ciguatera awareness strategy**

### *a) Health Care worker survey*

Nineteen general practitioner (GP) networks have been identified and approached to distribute the Ciguatera awareness survey. These include the state and territory Rural Doctors Associations, GP Alliance and various GP colleges that maintain mailing groups. Particularly promising is the distribution through the states' and jurisdiction public health networks (PHN). Despite the current focus on COVID-19, sufficient positive responses have been received to continue with developing the survey. The Northern Territory PHN has offered to include a link and brief description of the survey in its newsletter and two Australian GP mailing groups (400+ recipients) have agreed to distribute it in their publications. An expression of interest for health care professionals on Ciguatera was distributed through these mailing groups and the Northern Director of Medical Services (Torres and Cape Hospital and Health Services) has expressed an interest to be involved.

As the focus of health care workers currently is on COVID-19, developing these contacts and networks has been put on hold (to be revisited in June 2020). In the meantime, we will continue to develop the survey and prepare an article summarising key aspects of the SafeFish national Ciguatera strategy for GPs. The editor of the Australian Communicable Disease Intelligence journal has offered to include the article as a Notice to Readers. Key survey content has been determined and we are in the process of acquiring the French Polynesian health care worker survey from Clémence Gatti (invited guest speaker at the 2019 SafeFish Ciguatera workshop). The focus will then shift to the design and finalisation of the survey to seek ethics approval through the University of Adelaide.

### *b) Recreational fishermen*

As requested by the Game Fishing Association of Australia at the National Recreational Fishing Conference in Hobart last December, a short article summarising key Ciguatera fish poisoning information was prepared and will be published in the April 2020 issue of BlueWater to increase awareness among recreational fishers. A video of the presentation that was given at the conference is currently available on their website (available for the next couple of months). If there is interest, it may be possible to acquire a copy of the recording to upload on the SafeFish website.

SafeFish is in the process of following up with contacts made at this Regional Fishing conference to determine funding opportunities to build an open online platform for recreational fishers to enter and view Ciguatera case details (catch location, size etc.). Queensland Fisheries has already expressed interest in linking such a map to its recreational fishing phone application.

### **Biotoxin Harmonisation Application to Food Standards Australia**

Work is still ongoing for this project. The first of two applications have been completed and the Secretariat is still on-track to meet the end of April 2020 deadline at this stage, however due to increasing workloads resulting from COVID-19, this has the potential to be extended until the end of May. Finances are available in the SafeFish budget to have the applications peer reviewed once they are finalised to ensure that the content is thorough, robust and effectively meets FSANZ requirements. If a consultant is engaged to undertake a peer review, the expected completion date for this will likely be extended until mid-2020.

### **Microplastics Research**

The second steering group meeting for the joint SafeFish/Adelaide University project investigating the incidence of plastic in Australian commercial seafood was held on March 19 2020. The majority of the samples for this project have been collected and tested with the remaining samples to be analysed within the next few months. Preliminary results have found that there is a high incidence of fish and shellfish that contain plastics across all regions of Australia; however, the amount detected is low and variable. The next step of the project is to compare these findings with that of other international data to contextualise and benchmark these results for Australia. The project team expressed an opinion that to date the results have shown no evidence that this represents a public health concern. Once the samples have been completely analysed, SafeFish will be working with the University of Adelaide to prepare a fact sheet/info graphic to communicate the findings. The project is due to finish in August 2020.

### **New Project: US Market Access for bivalve shellfish**

The Department of Agriculture, Water and Environment informed SafeFish that the Package Assisting Small Exporters (PASE) would be re-opening the grant scheme in 2020. SafeFish developed a collaborative project application to access the US Market for bivalve shellfish with consultant Dorothy-Jean McCoubrey and the SA Department of Trade and Investment (DTI). The application was driven by considerable interest from bivalve shellfish growers and exporters, and follows a gap analysis that SafeFish, DJ McCoubrey and Oysters Tasmania conducted in the previous PASE scheme.

The project will involve extensive negotiations with the US FDA, however the following tasks must be completed prior to this dialog being opened:

1. The viability of the trade and a long- term model for cost recovery of DAWE services determined; and
2. Regulatory guidance in ASQAAC adapted to cover the major differences between the Australian and US programs (e.g. Vibrio control).

DTI will conduct a market analysis to determine the demand and potential price points in the US. It will assist industry to explore and understand the US market and build trade relations. Models of cost recovery and the potential cost impacts for market access into the US market will be investigated and interested stakeholders will be consulted to determine the likelihood of long-term arrangements succeeding.

ASQAAC policy is required for Vibrio risk management. Policy will be developed that is flexible enough for each state to take a unique and risk commensurate response to this issue but will also satisfy US requirements. Other minor issues will also be addressed. The policy will be presented at an ASQAAC meeting and finalised out of session.

When these tasks have been completed, negotiations for equivalence will be instigated with the US FDA, starting with a technical survey of Australian regulations and implementation of these, responses to questions and concerns and concluding with a US FDA visit to Australia.

The project proposal was submitted on the 27th February 2020 with the outcome of funding still pending.

### **Assistance to other project development aligned to SafeFish goals**

The latest FRDC round included a call for projects to address the strategic issues facing the development of a shellfish aquaculture industry in northern Australia. SafeFish distributed this expression of interest to consultants and researchers in Australia and New Zealand and assisted in bringing a team together to submit a project application. The team has considerable domestic and international expertise in shellfish quality assurance programs. It is led by Sarah Ugalde (UTAS), and includes Phil Baker (ASQAAC Chair), DJ McCoubrey (Consultant with shellfish QA experience in NZ and with FAO in developing countries), Matthew Osborne (NT Fisheries) and Alison Turnbull. Consultation with industry in northern Australia will be extensive to ensure the final recommendations are practical and implementable in the northern Australian context.

## **3. Communications**

The 2018-2019 SafeFish Annual Report was completed in November 2019 and distributed to stakeholders. An electronic copy can be found on the SafeFish website or by [clicking here](#).

Highlights in the report include:

- the review and drafting of advice into 20 standards, guidelines and policies relating to seafood at the international Codex Forums;
- increased collaboration with our New Zealand stakeholders to share research in areas where there is a similar need or issue. This has also included exploring the potential for leveraging funding opportunities for new projects around food safety and market access between both countries;
- supporting technical representation to ensure industry representation and input to the Australian delegation at the Codex Committee on Contaminants in Food;
- conducting a future-looking prioritisation workshop with industry representatives to identify the current and emerging food safety and market access issues of highest significance to the seafood sector.

- Supporting industry and independent technical discussions through invited presentations and attendance at 34 industry conferences, workshops and meetings.
- Progressing significant and emerging risk technical work on Ciguatera fish poisoning, microplastics in seafood, and biotoxin incident management and research.

#### **4. Enquiries, Meetings and Workshops**

- In the period from Nov 2019 to April 2020, SafeFish has assisted with 32 direct enquiries relating to food safety and/or market access in seafood.
- On the 28<sup>th</sup> February 2020 Alison Turnbull was an invited expert at the WA shellfish quality assurance program classification framework workshop where she was asked to provide input on behalf of ASQAAC as well as advice on incident response. In addition to the workshop, she also met with the Department of Fisheries and the Department of Health to discuss and advise on current *Alexandrium* bloom events in the region.
- On the 9th to 11th of March 2020, Alison Turnbull took part in a review of the New Zealand Seafood Safety Research Platform as part of an International Advisory Panel. This extends the collaboration between Australia and New Zealand in the non-competitive seafood food safety space. The research conducted by this platform is exemplary, and demonstrates leadership in NZ's seafood industry. The platform includes research on a mix of novel ideas, development of proven ideas, and application of successful research into industry and regulatory practice. Much of the research has direct application in Australia, and collaborations with Australian partners will continue to provide benefits to both countries.

#### **5. Action Items from previous meetings**

Action items pending from meetings held on 08/04/2019 and 09/10/2019 are shown at the end of this document with notes on the progress that has been made to date. If you would like further information on anything reported, please feel free to contact the [secretariat](#).

The team at SafeFish would like to wish you and your families the very best in this difficult and uncertain time. As always, SafeFish will continue to provide services on behalf of the seafood industry, our members and investors to continue to assure consumers of the safety and quality of Australia's seafood. Please don't hesitate to reach out to us if there is anything that we can do to assist you or your organizations.

<b>Actions from meeting 08/04/2019</b>				
<b>Number</b>	<b>Action Detail</b>	<b>Responsible Party</b>	<b>Date Due</b>	<b>Progress</b>
2a	Check on the process and timeframe for the pending review of Chapter 4.2.1 'Primary production and processing standard for seafood'.	FSANZ	December 2019	No update provided on this
2b	Send links/documents on existing guidelines relating to microbiological process control to SafeFish secretariat to collate for working group discussions.	Partners and Secretariat	March 2020	Information received from Simplot 20/06/2019
4a	Liaise with Seafood Industry Australia (SIA) and seafood industry associations to inform them of the National Traceability project and coordinate an industry plan.	Nicole Stubing	July 2020	
4b	Discuss with the traceability team if SafeFish can be provided an excerpt of the seafood review that was included in the confidential Stage 1 report. Secretariat to distribute the non-confidential Stage 1 report that is available online.	Secretariat	July 2020	Pending
6.1b	Investigate if the Ciguatera sufferer's personal account could be re-presented and captured on video for future use.	Secretariat	November 2020	Pending
6.2b	Progress written aspect of the FSANZ biotoxin harmonization application.	Secretariat	April 2020	Pending. See update above

<b>Actions from meeting 09/10/2019</b>				
<b>Number</b>	<b>Action Detail</b>	<b>Responsible Party</b>	<b>Date Due</b>	<b>Progress</b>
3a	Discuss with FSANZ how risk communication for vulnerable populations has been addressed in other cases (e.g. alcohol, soft cheese, mercury etc.). This is to assist with future project development on the 'better understanding risks associated with consuming ready-to-eat seafood' concept.	Secretariat	Early 2020	AT to progress
3b	Invite OzFoodNet coordinator to attend and present at next SafeFish meeting to better understand how data collation and reporting occurs.	Secretariat	February 2020	Deferred to July meeting
3c	Request Andreas Seger scopes a position paper on the impact of climate change and food safety for the seafood industry. Identify what research is being undertaken and the gaps. For consideration at next meeting.	Secretariat	July 2020	In progress
3d	Speak to Julie Stratford about registered training organization documents relating to skills impact to assist with data gathering of the risks associated with ready-to-eat fish outlets for the FSANZ micro criteria review.	Chair	July 2020	In progress
3e	Ensure that the prioritization process assessment framework is reviewed/amended to include a weighted non-vote option (either for lack of expertise in that area or if the category is not relevant to the issue being ranked).	Secretariat	Late 2019	Captured for next process
4a	Develop a MoU with STAG to detail relationship and working arrangements. The MOU will focus on relationships between the entities while specific project and operational activities will be agreed and included in schedules attached to the MOU for ease of delivery and management as well as demonstrating the continuing commitment to the relationship.	Secretariat	Early 2020	Teleconference to be scheduled for April to progress

4b	Include an item to discuss the STAG Draft Trade Agenda at the March meeting.	Secretariat	July 2020	Completed – Deferred
5a	Contact partners to nominate a proxy/deputy/succession candidate for their position on the SafeFish panel.	Secretariat and Partners	Early 2020	Completed
5b	Send reminders to partners that have not yet completed the skills map survey.	Secretariat	November 2019	Completed
5c	Include an agenda item for next meeting to discuss the final skills map results and finalise.	Secretariat	February 2020	Completed - Deferred
6b.1	Send out Microplastic fact sheet research in Aus./NZ to the RACs and Alison Connelly/Leah Fergusson for their information.	Nicole Stubing	November 2019	Completed
7a	Organise participation of Hazel Farrell at CCCF in April 2020.	Secretariat	Early 2020	Completed. Meeting postponed
7b	Discuss with Andy Pierson about the process for uploading data into the GEMS database and inform the secretariat. Secretariat to potentially investigate the practicality of requesting Hazel Farrell upload Australian mercury data into GEMS as an offset of her role as SafeFish technical delegate to CCCF.	Cathy Webb	Late 2020	Hazel has agreed to do this – SafeFish to assist and progress by late 2020
8a.1	Formally acknowledge Rochelle Prattley for her effort and contributions to SafeFish.	Secretariat	November 2019	Email sent
8c.1	Explore how to engage in the FRDC planning process for the new Research Strategy Plan for 2020-2025.	Secretariat	February 2020	Pending
10b.1	Draft a process/guideline for the Charter detailing how external parties will be selected and invited to attend partner meetings as observers.	Secretariat	July 2020	Deferred to July meeting
12a.1	Contact AAGA to understand more about the service request.	Alison Turnbull	July 2020	Not completed