



25 October 2017

(17-5802)

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Committee on Sanitary and Phytosanitary Measures

Original: French

**REVISION OF THE PRELIMINARY DRAFT GUIDELINES ON
HISTAMINE CONTROL IN THE CODE OF PRACTICE FOR
FISH AND FISHERY PRODUCTS (CAC/RCP 52-2003)**

COMMUNICATION FROM MOROCCO

This communication, dated 24 October 2017, is being circulated at the request of the delegation of Morocco.

1 INTRODUCTION

1.1. The Government of Morocco has the honour of drawing the attention of WTO Members to the fact that the fishery sector is a resource that provides structure to the Moroccan economy, and is one of the pillars of the domestic economy. It has contributed an average of 2.3% to GDP during the last ten years. In 2015, the fishery sector recorded an export turnover of US\$1.85 billion, representing 6.8% of total exports and 58% of exports of agri-food products (Trade, 2016).

1.2. The fishery sector creates over 26,000 direct jobs and 100,000 indirect jobs. The level of employment could be higher if units had the possibility to function at maximum capacity, instead of at 50%, which is currently the case.

1.3. Since 2011, within the Codex Alimentarius, the delegation of Japan has been proposing that the issues relating to histamine be examined from a broader perspective, that the public health risks linked to the presence of histamine in fish and fishery products be studied, and that the existing sampling plans and different levels of protection applied on a national scale be taken into account. It has emphasized that this work should be carried out in conjunction with the study on microbiological criteria currently being conducted by the Codex Committee on Food Hygiene. An electronic working group, co-chaired by Japan and the United States, has since been mandated to examine the issue of histamine from different angles, with a view to lowering the current histamine limit in fishery products.

1.4. Given that a potential reduction of the histamine level for fishery products would be problematic for its exports, Morocco, which is aware of the socio-economic challenges that come with this issue, has stressed the need to prepare the missions organized by the Codex Alimentarius over the last six years, and members of the Moroccan delegation have participated in the work of the different electronic working groups set up by the Codex Alimentarius secretariat.

1.5. The observations made by the members of the electronic working groups, of which Morocco is an active member, have addressed a large number of topics relating to histamine, in particular:

- maintaining the current histamine limit for health and safety within the standards or revising the current limit downward on the basis of dose-response data, taking into account uncertainty and other risk management factors;
- creating a new histamine sampling plan;
- considering different histamine limits for products based on consumption levels, or other product characteristics; and
- re-evaluating the histamine limit for decomposition to include it within the standards.

2 CONSEQUENCES OF LOWERING THE HISTAMINE LIMIT

2.1. If a reduction of the histamine safety limit were approved within the Codex Alimentarius, it would be very difficult for products from Morocco and other developing countries to meet this requirement, and as a result:

- Moroccan exports of fishery products would be impeded (particularly for pelagic fish such as: sardines, anchovies, mackerel, tuna, etc.).
- Lower exports would have a proportional effect on employment along the entire value chain. Between 16,000 and 17,000 direct jobs would be lost if exports decreased by 60%, and between 5,000 and 6,000 direct jobs if exports fell by 20%, with simultaneous negative repercussions for indirect jobs.
- The price of sought-after raw materials would rise and the supply of products would decrease, which would lead to an increase in the price of finished products, especially as demand is growing, particularly for exports to Africa. Such demand represents between 40% and 45% of exports, particularly to countries with limited revenue. This category of the population would be heavily affected, as it would have to pay higher prices or reduce consumption.

3 CONCLUSIONS

3.1. Given the fact that:

- the threshold toxic dose for histamine in fish is not clearly or precisely defined (Taylor, 1986). In most cases, histamine levels in illness-causing fish have been above 200 mg/kg, and often above 500 mg/kg (FDA, 2011);
- the potential lowering of the limit could have a damaging socio-economic impact on the sector;

Morocco calls on members of Codex Alimentarius to take into account the exports of developing countries in the definition of a new lower limit of histamine in fishery products and the new guidelines for histamine control, while preventing a negative impact on the economies of such countries.

3.2. It is paramount that the socio-economic repercussions of this action be taken into account. The Codex Procedural Manual clearly stipulates (page 121) that the chairperson of a Codex committee must ensure that matters are not progressed from step to step until all relevant concerns are taken into account and adequate compromises worked out.

3.3. Morocco proposes that Codex Alimentarius establish a group of experts to examine the preliminary draft guidelines on histamine control in the Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003), particularly the application of the HACCP system to artisanal fishing boats, which is very difficult to implement.
