Industry Notice

April 13, 2012

TO: All Canadian Exporters of Fish Products

SUBJECT: Monitoring for Polycyclic Aromatic Hydrocarbons in Smoked Fish Products Destined For Export to the European Union

The Canadian Food Inspection Agency (CFIA) wishes to advise that export certification requirements for fish products destined for the European Union (EU) are updated to include the standards for polycyclic aromatic hydrocarbons (PAHs). PAHs are a class of contaminants which may be present in foods due to contamination from the environment or due to processing methods such as cooking or smoking. According to European regulations, the levels of benzo-a-pyrene (measured in µg/kg) that are currently permitted are 2.0 in the muscle meat of fish, 5.0 in crustaceans and smoked fish, and 10.0 in bivalve molluscs [Commission Regulation (EC) No. 1881/2006]. Please be aware that the EU standard will be changing on Sept. 1, 2012, so that an additional standard will be based on the sum of benzo-a-pyrene, benz(a)anthracene, benzo(b)fluoranthene and chrysene [Commission Regulation (EU) No. 835/2011]. Further details on the future standards are available at:


According to the CFIA’s Fish Export Policy, exporters are responsible for ensuring that the products they export are harvested, processed, transported, handled and stored in a manner that meets both Canadian requirements and the requirements of the importing country. In line with this policy, companies who wish to export fish products to the EU are responsible for conducting monitoring for PAHs in these products in order to demonstrate that they meet the EU standard. Exporters are advised that they should begin now to collect analytical results to demonstrate this compliance. Beginning Oct. 1, 2012, the CFIA may request to see analytical results for PAHs in fish products presented for export to the EU. Based on risk, the CFIA will initially be verifying these data only for smoked fish. CFIA will develop guidance for determining the number of samples required to demonstrate compliance with reasonable assurance. Until this guidance is provided, exporters should test one out of every 10 export shipments of smoked fish exported to the EU as a minimum.

Analytical results should be obtained from laboratories accredited by the standards Council of Canada (SCC) under the Program for Accreditation of Laboratories (PALCAN), in conformity with CAN-P-4D (ISO/IEC 17025), General Requirements for the Competence of Testing and Calibration Laboratories. SCC accredited laboratories which offer testing for PAH’s can be located by typing the word “PAH” INTO THE “Keywords” field of the search tool on the PALCAN website at:

http://palcan.scc.ca/?SpecsSearch/GLSearchForm.do?language=en
For general information on the formation and control of PAHs in dried and smoked fish products, processors and exporters are encouraged to read the “Codex Code of Practice for the Reduction of Contamination of Food with PAH from Smoking and Direct Drying Processes (CAC/RCP 68-2009)”, which is accessible at:

http://www.codexalimentarius.net/web/standard_list.do?lang=eng

Sincerely,

Terence McRae
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