



November 1, 2004

Ms. Melissa Ellwanger
FDA Office of Seafood (melissa.ellwanger@cfsan.fda.gov)

Re: Codex Alimentarius Commission- Code of Practice for Fish and Fishery Products:
Draft Section on Aquaculture Request for comments at Step 6

Dear Ms. Ellwanger:

The National Aquaculture Association (NAA), an aquaculture industry trade association representing a diversity of domestic farm raised fin and shellfish interests, offers the following comments on the Draft Aquaculture Section Code of Practice for Fish and Fishery Products:

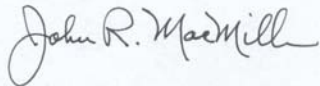
- **Section 2. Definitions. Diseased fish means fish on or in which pathological changes or other abnormalities are apparent.** This definition includes conditions that do not necessarily impact safety or quality. For example, abnormalities might include slight developmental anomalies that do not impact safety or quality. We suggest deleting abnormalities but keep pathological changes.
- **Section 6. Aquaculture Production. Preamble.** The second paragraph in the preamble states that chemicals used at fish farms should not be released into the surrounding environment. This is overly restrictive and not necessarily consistent with good aquaculture practices or environmental protection. We suggest rephrasing to state as follows: When using chemicals at fish farms, special care should be exercised so that these substances are not released into the surrounding environment unless such release is approved by the official agency having jurisdiction.
- **Section 6.1.2. Growing water quality.** Statement is made that fish farms should not be sited where there is a risk of contamination. Regardless of where a site it, unusual things could happen thus there is always some, albeit perhaps minimal risk. We suggest rewriting in the affirmative as follows: fish farms should be sited where risk of contamination of the water in which fish are reared is unlikely.
- **Section 6.1.3. Feed supply.** Bullet 2 statement is that feed should be stored in a cool and dry area. This makes sense as long as the feed is not a moist pellet. We suggest stating that feed should be stored according to manufacturer's instructions.
- **Section 6.1.3. Feed supply.** Bullet 14 statement is that farmers should follow manufacturer's instructions on use of veterinary drugs or medicated feeds. Since

this is a section dealing with feed, we suggest limiting the comment to just feed. We also suggest including veterinarian instructions for use of medicated feed (in addition to instructions of the supplier.)

- **Section 6.3.2. Veterinary drugs. Bullet 4 and 5.** We suggest adding “veterinary” in front of products.
- **Section 6.3.3 Growing Bullet 3.** We suggest rewording to first emphasize determination of the cause of death before disposal e.g. The cause of death or disease should be determined. Dead or diseased fish should be disposed in a sanitary manner that will discourage the spread of disease.
- **Section 6.3.4 Harvesting. Bullet 2.** Suggest emphasizing that it is during transport that live fish should not be exposed to environmental extremes.
- **Section 6.3.6. Bullet 4.** Statement is made that human sewage should not contaminant water. Contamination should not be limited to just human sewage. Fecal matter of mammalian or avian origin can carry similar pathogens as human sewage. If there is need to prevent contamination from human sewage then there is equal need to prevent contamination from other mammalian and avian fecal sources. Since the real safety issue is probably the use of sewage to fertilize ponds rather than the incidental contamination that can occur from animals such as birds or rodents, we suggest this should be the focus of bullet 4. We suggest the use of animal sewage (human or other homeothermic i.e. warm blooded, animals) should be discouraged.
- **Section 6.3.7. Live fish stored and transported bullet 4.** Statement is made that fish could be tied. This seems impractical. We suggest different terminology to emphasize restraining or constraining systems.

We hope these suggestions are helpful.

Sincerely,

A handwritten signature in cursive script that reads "John R. MacMillan". The signature is written in dark ink on a light blue background.

John R. MacMillan, Ph.D.
President