

<ul style="list-style-type: none"> <li>Do you believe that the <b>structure</b> of the draft is correct?</li> </ul> <p><b>Yes/No – if No, please suggest an alternative structure</b></p>
<p>Yes</p>
<ul style="list-style-type: none"> <li>Do you believe that there are <b>aspects</b> of this draft guidance that are <b>missing or considered to be redundant</b>?</li> </ul> <p><b>Yes/No – if Yes, please specify which these are and the reasons why.</b></p>
<p>Yes.</p> <p>In various places within the draft guidance (e.g. Paragraph 31 and Paragraph 35, Section 8) there is reference to potentially pathogenic bacteria and microbiological hazards. In addition to these hazards, chemical contamination and hazards should also be monitored and controlled.</p> <p>Similarly, treated water should be monitored to ensure that it complies with trace chemical limits.</p> <p>Paragraph 43 states “Irrespective of the source, water used in the production and processing of fish and fishery products must be frequently monitored to ensure that it is safe for use on food products processing, food contact surfaces and to make ice.” IFST recommend that this section should be expanded to specify that in addition to the water being monitored, that irrespective of the source, water should meet the requirements based on appropriate risk assessment (e.g. HACCP principles) commensurate with the intended process or use.</p>
<ul style="list-style-type: none"> <li>Please provide <b>any general comments on Section 5.5</b> that you may have to make in the box below.</li> </ul>