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# *Communique*

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**TO: Fresh and frozen fish processors and importers**

**SUBJECT: Common name for fresh and frozen fish fillets and shucked shellfish**

The purpose of this communique is to inform Canadian fish processors and importers of requirements regarding the proper common name for fresh and frozen fish fillets and shucked shellfish.

It has been brought to our attention that some processors label fish fillets with a common name that does not include the name of the species. In some cases, they are also using the descriptive term “grilled” as a part of the common name on fillets or scallops adorned with grill marks even though the products are not actually “grilled”.

Since these products contain salt and seasonings, in addition to the grill marks, there is a misconception that these are unstandardized products and are exempt from the regulations regarding the use of common names for standardized fish products.

According to B.21.003 of the *Food and Drug Regulations*, these are standardized products:

B.21.003 states that standardized fish fillets;

- if fresh may or may not contain salt and seasoning;
- if frozen may or may not contain salt and seasonings, and also the additives listed in section B.21.003(a)(i)(ii).

B.21.004 regulates shellfish meats and similarly permits the use of salt and seasonings in standardized fresh and frozen shellfish.

Section 26.(1) (a) of the *Fish Inspection Regulations* requires that standardized fish products be labelled to include the name of the species as a part of the common name, e.g. salmon fillets, cod fillets. A generic common name such as “fish fillets” is **not** acceptable. If the fillets or shellfish meats were treated with any seasonings, salt or additives, a list of ingredients must be present on the label and the name of the fish species repeated in the ingredient list.

When raw seafood product such as frozen fish fillets or shellfish is adorned with grill marks and the product’s label contains a descriptive term “grilled” as part of the common name, this practice is false and misleading. The labelling of these products as “grilled” may suggest that the products are ready-to-eat and do not require a proper cooking process. As per Bulletin 42 of the Fish Products Inspection Manual that applies to fish products that may be mistaken for ready-to eat foods, the products with grill marks must be additionally labelled with cooking instructions.

Processors and importers are hereby requested to take immediate action to bring labels to compliance. The labels must be corrected no later than 31 December, 2003, when the Canadian Food Inspection Agency will take enforcement action on any labels on fresh and/or frozen fish and shellfish where the common name does not comply with the regulatory requirements, namely:

- the name of the species is not included in the common name of the product; or
- the word "grilled" forms part of the common name on fish products that are not ready-to-eat.

After this date, products with non compliant labels will be rejected, and product will not be allowed to be marketed until the label is brought into compliance.

*Original signed  
July 17, 2003*

Mary Ann Green  
Director  
Fish, Seafood and Production Division