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April 13, 2000

Dockets Management Branch  
HFA - 305  
Food & Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Dear Sir:

REF: Docket NO .00N-0120

I am a US importer of Dried Seafood from Norway. My product of import is Norwegian Dried Stockfish. As you know, stockfish is harvested in their natural state and processed under natural environmental conditions without the use of chemical and preservatives. Even with the careful attention and best processing equipment available, we should keep in mind that stockfish is dried outside during the cold winter months. During this process of drying in the open air, an unseasonable warm weather could subject the fish to parasites such as flies. The stockfish when dried may have maggot hooks, which poses no severe public health threat.

Just like any farm product, as an example corn or potatoes, some level of exception should be established for the tolerance of unavoidable parasites that are not harmful to human beings. For centuries, stockfish has been process the same way and has been eaten by people all over the world with no complains of ill health due to the consumption of stockfish.

In the preparation of dried stockfish for consumption, it is thoroughly washed or soaked over night to expose the inner core of the fish. The stockfish is then cooked for 30 to 45 minutes to soften it and then it is prepared in various ways, which requires additional cooking.

As you implement your initiative to ensure safety of imported foods, let it be known to you that stockfish is safe and offers great nutritional values greater than fresh fish.

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Many times, the FDA, based on laboratory report of few dead maggots or maggot hooks denies imported stockfish. These parasites are washed away during preparation for consumption.

Your office needs to establish a uniform level of parasite tolerance, which should be communicated to the Norwegian stockfish export group, and the F D A laboratories. No body has been taken ill or suffered any food poisoning due to the consumption of dried stockfish .It is my opinion that a new tolerance standard be initiated for the evaluation, lab testing and approval of imported dry stockfish into the United States.

I am enclosing brochures on stockfish and its processing.

Yours very truly,



Rosebery Ngumezi

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**NORGES TØRRFISKNÆRINGS LANDSFORENING**  
THE NORWEGIAN STOCKFISH ASSOCIATION



## STOCKFISH

**The Norwegian Stockfish Association was founded in 1937 to promote the interests of Norwegian stockfish producers and exporters, and to foster cooperation between its members.**

### Valuable Source of Protein

Norway has exported stockfish for more than a thousand years, but it is only in recent years that the nutritional value of this outstanding product has been fully recognized.

The fish are caught off the coast of northern Norway, north of the Arctic Circle. Upon landing, the heads are cut off and the fish are gutted and thoroughly cleaned, before being hung on wooden racks for a drying period of up to 12 weeks. When the drying period is over, the fish contain no more than 15 % moisture. A breakdown of dried stockfish produces the following results:

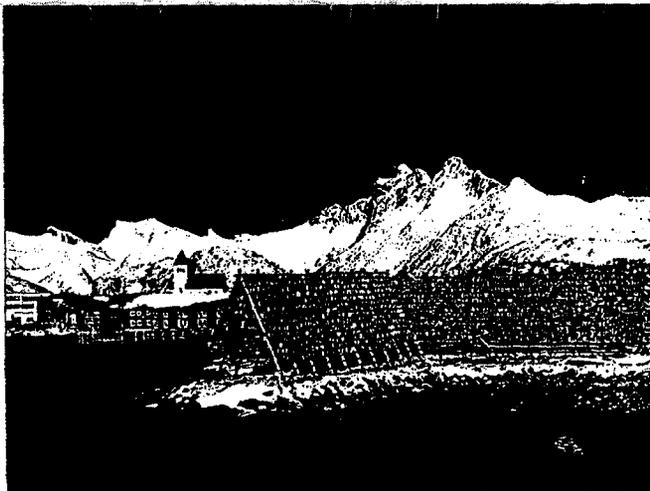
- Fat: approx. 2 %
- Minerals: approx. 3 %
- Protein: approx. 80 %
- Water: approx. 15 %

The high protein content of Norwegian stockfish makes it an extremely valuable food source. None of the nutritional value of fresh fish is lost in the drying process. The World Health Organization calculates that one kilogram of stockfish has the same nutritional content as five kilograms of fresh fish.

### Cold, Clean Environment

Climatic conditions in northern Norway are ideal for the production of stockfish

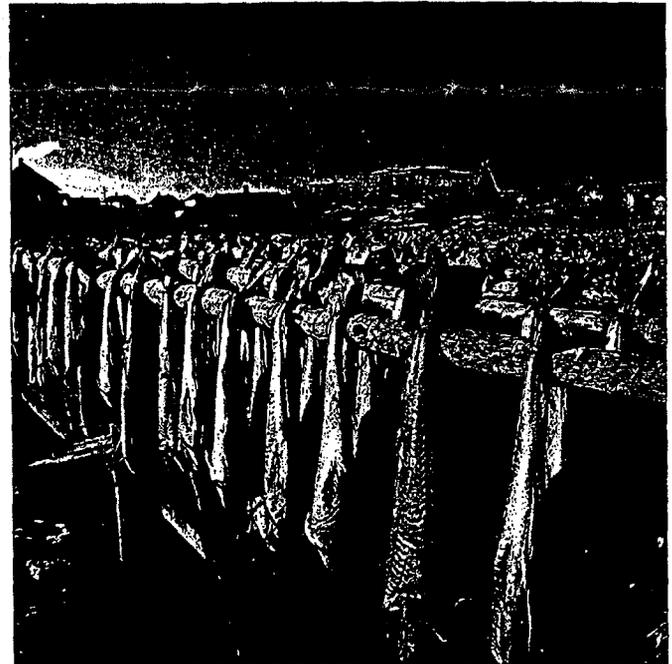
Trym Ivar Bergsmo / © Norwegian Seafood Export Council



because the air is cold, dry and free from pollution.

### No Refrigeration Needed

Well-proven production methods, experienced exporters and careful grading, sorting and packing have earned Norwegian stockfish an excellent reputation. Norwegian stockfish can be stored for months without refrigeration – even in tropical climates.



Kari-Ivar Thorbjørnsen

### Delicious & Nutritious

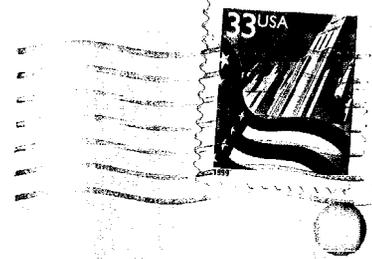
Norwegian stockfish is produced solely from first-class fresh fish, without the use of chemicals or preservatives. In addition to providing an excellent source of body-building protein, stockfish forms the basis for a wide range of mouth-watering ethnic and international recipes.

### Export Markets

The Norwegian Stockfish Association assists its member companies in exporting their products worldwide, primarily to Italy and Nigeria, but also to:

- Croatia
- Netherlands
- Scandinavia
- UK
- USA
- Western Africa

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