

SALDICOD project - Norwegian Seafood Research Fund (FHF)





¿Why and how to properly give information to consumers about cod products?

The description and commercial name is the business card of a food product. It is also the essential element to assure communicating relevant information that allows the purchaser to know its real nature, and distinguish it from products it might be confused with.

One of the attractions of codfish is the variety of forms and presentations, as well as industrial and salting processes applied to bring specific sensory characteristics. Each one of these varieties of cod requires different conditions during transport and storage in order to stabilized the product, and ensuring the strictest hygienic safety of the product.

The degree of the salt-curing and/or drying applied to cod products is also an important quality parameter which should be addressed, avoiding any false interpretation derived from national terms translated to other languages.

Lately, change in consumers' lifestyle has increased their interest for ready-to-use and less time-consuming products. This has motivated the cod industry to develop new products which match consumer needs, as is the case of **light salted cod** and industrially **desalted** cod products. It is generally considered that sensorial profiles of these two products are significantly different. Specific flavor and texture changes arising from heavy salting and controlled ripening through prolonged storage are appreciated characteristics from southern Europe consumers. Nevertheless, recent studios within the SALDICOD project (unpublished) have revealed that a general consumer panel is only able to recognize product sensorial specific features after cooking, and not at the moment of purchase.

Similarly, in the present situation in market, there are certain difficulties for a general consumer to differentiate light salted cod from simply frozen cod products (without any brine injection). Some products avoid the use of the descriptive name "al punto de sal" (light salted in Spanish) accompanying the customary name of the product and even checking the list of ingredients for added salt and/or water or additives ensures the correct identification of the product by consumer.

Therefore, a clear identification of the product in market, as well as proper information to allow conscious choice by consumers should be addressed.

It seems appropriate to propose a systematic classification of the commercial varieties of cod, based on the technological process applied. The present document contains useful technical elements to define commercial categories intended to inform consumers about the real nature of the food and distinguish it from foods it might be confused with. Document also contains other elements for discussion regarding trade and production aspects of cod products.

I. Regulatory framework and legal discussion.

a. The name of the food.

According to the Regulation UE No 1169/2011 ¹ on the provision of food information to consumers, labeling of food should allow consumer to know the real nature of the product and its basic features, to make it possible to distinguish them from other similar products.

Article 7: Fair information practices.

- 1. Food information shall not be misleading, particularly:
- (a) as to the characteristics of the food and, in particular, as to its <u>nature</u>, <u>identity</u>, properties, composition, quantity, durability, country of origin or place of provenance, <u>method of manufacture</u> or production;

To achieve these purposes, Article 9 of Regulation 1169/2011 provides a series of mandatory information, among which include the name of the food and the list of ingredients available.

CHAPTER IV . MANDATORY FOOD INFORMATION. SECTION 1. Content and presentation Article 9: List of mandatory particulars.

- 1. In accordance with Articles 10 to 35 and subject to the exceptions contained in this Chapter, indication of the following particulars shall be mandatory:
- (a) the name of the food;
- (b) the list of ingredients;.

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Regulation UE 1169/2011 gives to the *Name of the food* a main role to enable consumers to know its true nature and distinguish it from other products. In this sense, three different types of Names of the food could be considered; *Legal name*, *customary name* and *descriptive name*:

- (n) **'legal name'** means the name of a food prescribed in the Union provisions applicable to it or, in the absence of such Union provisions, the name provided for in the laws, regulations and administrative provisions applicable in the Member State in which the food is sold to the final consumer or to mass caterers;
- o) 'customary name' means a name which is accepted as the name of the food by consumers in the Member State in which that food is sold, without that name needing further explanation;
- (p) 'descriptive name' means a name providing a description of the food, and if necessary of its use, which is sufficiently clear to enable consumers to know its true nature and distinguish it from other products with which it might be confused;

¹ Regulation UE No 1169/2011 of the European Parliament and of The Council of 25th October, 2011 on the provision of food information to consumers,......



In the case of cod products, no *'legal name'* could be considered at a Community level since no common marketing standards have been laid down governing the sales description of the different preparations of cod. Specific regulation, presently into force, exists only in the case of Portugal².

Article 17 and Annex VI details some of the conditions regarding the implementation of the Name of the food.

Article 17: Name of the food.

- 1. The name of the food shall be its **legal name**. In the absence of such a name, the name of the food shall be its **customary name**, or, if there is no customary name or the customary name is not used, a **descriptive name** of the food shall be provided.
- 2. The use in the Member State of marketing of the name of the food under which the product is legally manufactured and marketed in the Member State of production shall be allowed. However, where the application of the other provisions of this Regulation, in particular those set out in Article 9, would not enable consumers in the Member State of marketing to know the true nature of the food and to distinguish it from foods with which they could confuse it, the name of the food shall be accompanied by other descriptive information which shall appear in proximity to the name of the food.

In Annex VI, mandatory particulars accompanying the name of the food are laid down;

1. The name of the food shall include or be accompanied by particulars as to the physical condition of the food or the specific treatment which it has undergone (for example, powdered, refrozen, freeze-dried, quick-frozen, concentrated, smoked) in all cases where omission of such information could mislead the purchaser.

The underlined text in the two previous sections above, refers to an essential element which should be considered. In the present situation of absence of common standards applicable to marketing cod preparations, it is necessary to provide the necessary elements which shall accompany the Name of the food, by defining the main characteristics of cod products and a proposal for their correspondent proposed descriptive names, taking into account present market situation and in order to fulfill the mandate of information to consumer.

b. <u>Misleading Practices.</u>

Apart for the legal document, recently into force regarding the food information given to consumers, Directive 2005/29/CE on 'Unfair Commercial Practices³ is also supporting the present proposal.

² Decreto-Lei nº 25/2005 de 28 de Janeiro. Normas de comercialização para o bacalhau e espécies afins, salgados, verdes e secos. DIÁRIO DA REPÚBLICA — I SÉRIE-A N.o 20 — 28 de Janeiro de 2005.

³ Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market.......



Directive directly, and not only, protects consumer economic interests from unfair business-to-consumer commercial practices, but also guarantees fair competition in market by defending legitimate businesses from competitors who do not play by the rules in the document. Document also supports legal harmonization and the development of a single regulatory framework based on clearly defined legal concepts concerning unfair commercial practices.

In Article 6, the term *Misleading Action* is defined;

- 1. A commercial practice shall be regarded as misleading if it contains false information and is therefore untruthful or in any way, including overall presentation, deceives or is likely to deceive the average consumer, even if the information is factually correct, in relation to one or more of the following elements, and in either case causes or is likely to cause him to take a transactional decision that he would not have taken otherwise:
- (a) the existence or nature of the product;
- (b) the main characteristics of the product, such as its availability, benefits, risks, execution, composition, accessories, after sale customer assistance and complaint handling, method and date of manufacture or provision, delivery, fitness for purpose, usage, quantity, specification, geographical or commercial origin or the results to be expected from its use, or the results and material features of tests or checks carried out on the product;

Article 7 also defines Misleading Omission as;

1,2. A commercial practice shall be regarded as misleading if, in its factual context, taking account of all its features and circumstances and the limitations of the communication medium, it omits,.... hides, or provides in an unclear, unintelligible, ambiguous manner material information that the average consumer needs, or fails to identify the commercial intent of the commercial practice if not already apparent from the context, and where, in either case, this causes or is likely to cause the average consumer to take a transactional decision that he would not have taken otherwise.

c. <u>Interpretation of "Salting" and "processing" and related legal aspects.</u>

An example of the previously commented unfair practices might be the use of the term "desalted" in cases where the product has not undergone salting. In this sense, the term **salting** has been defined by (CODEX STAN 167-1989)⁴ as such that is a prolonged action of the salt, which is associated with the maturation or curing which involves enzymatic proteolysis. As applicable to salted fish and dried salted family Gadidae a minimum salt content of 12% by weight shall be reached.

We may also to consider that proper use of the term "salted" should be based on the guidelines above, and associated with "curing" introduced in point m) of Article 2 of Regulation (EC) No

 $^{^4}$ CODEX STAN 167-1989. Standard for salted fish and dried salted fish of the Gadidae family of fishes.



852/2004 ⁵, meaning "any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes;…

Recently, there has been certain controversy about the different categorization of light salted cod in international trade. The problem started when chicken lightly salted (up to 3%) imported from Brazil and Thailand was authorized to be classified under the category of salted chicken, which implied a lower customs tariff.

As a consequence, some customs offices across Europe changed to classify light salted cod from the original frozen fish fillets (030471) to salted fish (030532) leading to an increase on general customs tariff from 7,5% to 20%. Claiming from European importers and associations led the European Commission to the release of the *Commission Implementing Regulation (EU) Nº 388/2014* in order to clarify nomenclature on the Common Customs Tariff, and finally allocating light salted products under the frozen fish fillets (030471) category.

In Annex VI, of Regulation 1169/2011 concerning specific particulars accompanying the name of the food the name of the food, Point 2 includes:;

2. In the case of foods that have been frozen before sale and which are sold defrosted, the name of the food shall be accompanied by the designation 'defrosted'.

This requirement shall not apply to the following:

- (a) Ingredients present in the final product;
- (b) Foods for which freezing is a technologically necessary step of the production process;
- (c) Foods for which the defrosting has no negative impact on the safety or quality of the food.

Complementary, provisions of Article 35.d of **Regulation 1379/2013** ⁷ detail the circumstances when the term defrosted could be obviated.

Article 35: Mandatory information.

1. Without prejudice to Regulation (EU) No 1169/2011, fishery and aquaculture products referred to in points (a), (b), (c) and (e) of Annex I to this Regulation which are marketed within the Union, irrespective of their origin or of their marketing method, may be offered for sale to the final consumer or to a mass caterer only if appropriate marking or labelling indicates:

d) whether the product has been defrosted;

⁵ Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs.

⁶ Commission Implementing Regulation (EU) No 388/2014 of 10 April 2014 amending Annex I to Council Regulation (EEC) No 2658/87 on the tariff and statistical nomenclature and on the Common Customs Tariff.

Regulation (EU) No 1379/2013 of The European Parliament and of The Council of 11 December 2013 on the common organization of the markets in fishery and aquaculture products, amending.....



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The requirement in point (d) shall not apply to:

- (a) ingredients present in the final product;
- (b) foods for which freezing is a technologically necessary step in the production process;
- (c) fishery and aquaculture products previously frozen for health safety purposes, in accordance with Annex III, Section VIII, of Regulation (EC) No 853/2004;
- (d) fishery and aquaculture products which have been defrosted before the process of smoking, salting, cooking, pickling, drying or a combination of any of those processes.

Therefore, it seems necessary to open discussion to define whether the addition of discrete amounts of salt, or moreover, the use of brine during industrial processes causing the product to lightly absorb salt, are within the scope of the term "salting". This controversy also applies to the concept of smoking vs. smoke-flavoring, and the regulatory conditions applicable to their respective products.

Although Codex Standards do not have represent legal mandate, direct interpretation of Codex Standard 167/1989 leads not to include light salting within the scope of "salting", in the same way as smoke-flavoring is not considered smoking from the interpretation of *Codex Stan 311 – 2013* 8.

From that point of view and since both light salted and smoke-flavored products seems not to fulfill any of the exceptions cited above, they shall include the term "defrosted" accompanying the name of the food in the case the product has undergone freezing, even prior or after light salting or smoke-flavoring, and finally put into market in any thawed format.

Recently, it has been detected the presence in the Italian market of a product with the ambiguous trade name "refreshed cod", produced from Alaskan Gadus macrocephalus that undergoes a very discrete injection of salt (0,2-0,5%) after defrosting. This product avoids the use of the term "defrosted" by including an additional processing step (injection of salt), based on previous section 2.(b). Apparently, the intention of such a discrete addition of salt is no other than trying to avoid the declaration of the term "defrosted" accompanying the name of the food.

d. <u>Concept of processing.</u>

Discussion is also open to the interpretation of the concept "food processing" as defined in Article 2. 1,m) from Regulation (EC) 852/2004 on the hygiene of foodstuffs; since this concept entails several legal implications.

⁸ Codex Stan 311 – 2013. Standard for smoked Fish, smoke-flavored fish and smoke-dried fish.



- (m) <u>"processing"</u> means any action that substantially alters the initial product, including heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.
- (n) "unprocessed products" means foodstuffs that have not undergone processing, and includes products that have been divided, parted, severed, sliced, boned, minced, skinned, ground, cut, cleaned, trimmed, husked, milled, chilled, frozen, deep-frozen or thawed;

It seems obvious that once any fish has been salted, the final product is a "processed product". This is important whenever salted products are being further processed, and an example to this is regarding the use of additives during desalting. Since heavy salted products are considered as processed products, only the additives corresponding to category "09.2: "Processed fish and fishery products including mollusks and crustaceans" in the list of the Regulation 1129/2011 9 with their specific conditions of use could be considered after heavy salting.

The consideration of light salting as "processing" should also be open for discussion, and specifically whether the discrete addition of salt substantially alters the initial product.

e. Rehydrated vs. desalted.

These are terms arbitrarily used in trade and production of cod. Rehydration of salted products also leads to a loss of salt and therefore the desalting term could be used. The same does not occur with stockfish since the absorption of water does not imply the release of important amounts of salt to water used for rehydration.

Since stockfish and heavy salted fish can also be matter of confusion for consumers, it may be also appropriate to apply desalting to heavy salted products, and reserve the term "rehydration" to unsalted dehydrated products; just like stockfish.

II. International interpretation of concepts regarding fish salting.

The definition of certain aspects regarding production processes and commercial categories of salted fish is generally associated with customary national practices. Despite certain proposals and technical documents are available in different countries¹⁰, only Portugal has developed specific regulation². Brazil has also legally established minimum criteria for the differentiation of salted fish and dry-salted fish, based in moisture contents ¹¹. Several discrepancies have been found among the concepts used in different countries. In addition, the degree of curing of heavy salted cod is highly dependent of the internal market of the country of consumption. Finally, the

⁹ Commission Regulation (EU) No 1129/2011 of 11 November 2011 amending Annex II to Regulation (EC) No 1333/2008 of the European Parliament and of the Council by establishing a Union list of food additives.

¹⁰ Standard Saltfisk-og klippfiskprodukter. Norsk Bransjestandard for fisk: NBS 20-01.

¹¹ Ministério Da Agricultura, Pecuária E Abastecimento Secretaria De Defesa Agropecuária Portaria № 52, de 29 De Dezembro de 2000. Regulamento Técnico de Identidade e Qualidade de Peixe Salgado.



recent permission of use of phosphate additives during cod salting, has possibly modified the previous reference moisture contents for the different degrees of salt curing of cod.

Discussion of the terms to be used seems necessary. This document intends to open discussion for the harmonization of international criteria. A comparative table of international criteria concerning cod salting is laid down in Annex II.

III. Proposal

This proposal applies to cod (*Gadus spp.*), matured by salt or not and not submitted to thermal preservation processes. Present classification does not affect the anatomical portion used, using established terms as loins, belly, crumbs, sticks, chunks etc., which is also relevant information for the consumer. Additional classification regarding nutritional aspects; just like the final salt content (low salt, etc...) are not considered in this proposal.

Key elements of the proposal

- Avoid consumer confusion and unfair practices due to labeling of features that the product does not really possess.
- Encourage cod product differentiation, based on their positive aspects and added value as well as taking into account their versatility and suitability for different final uses and preparations.
- Propose a simple and easy systematization for the consumer to assimilate.
- Provide customary name with reference to specific product features and / or conservation mode.
- Enhance capacity to appreciate the particular characteristics of the different forms and presentations of cod.
- Avoid improper handling of the products during distribution and storage in the market chain and/or at home, with consequent loss of merchantable quality and hygienic safety.

I. Products which have undergone salt curing (i.e. traditional heavy salted cod).

Heavy Salted Cod: Subjected to the action of common salt at least to 12% by weight, in solid form or in brine, with or without other spices, which leads to a greater or lesser extent to an enzymatic maturation, and to distinct organoleptic characteristics. These products are presented in bulk or packaged and often desalted before consumption.
 We differentiate subcategories, depending on the degree of curing and the moisture content present. As previously detailed, some of these categories vary across countries of



consumption. Although this proposal tries to lay down a common ground resulting in the different commercial names at an international level, national subcategories and denominations could also be applied.

- ✓ Salt-cured cod (wet): Bled, headed and gutted fish, partially deboned, washed with seawater and finally heavy salted using brining and/or kench salting or picklesalting. Salt contents of at least 18%, expressed in sodium chloride, and moisture no less than 52%.
- ✓ Salt-cured cod (medium cure / Semi-dried): Corresponds to previously wet salted cod generally submitted to more intense maturing in humidity controlled environment. The moisture content in semi-dried cod samples lies between 52% and 47%.
- ✓ **Dry-salted cod.** With a more intensive or extended drying process leading to final moisture contents below 47% by weight.
- ✓ Yellow salt-cured cod: products subjected to the above operations and also, to a stage of partial desalting by immersion. After the maturation step these products have salt content generally between 12-16% and with moisture levels below 52%.
- Desalted Products: Produced from a salted product (as defined in Codex Standard 167/1989) and desalted to the recommended salt content, acceptable to the consumer, generally between 1.5% and 3%. Two sub-categories are distinguished depending on the final format of the product:
 - ✓ Chilled. Either unpacked or packed using vacuum packing, modified atmosphere packaging, high pressure processing, etc..
 - ✓ Frozen or "quick-frozen". Those that have been subjected to the action of cold, as established by law to at least -18 ° C. Term "quick-frozen" could be applied if it corresponds to the requirements prescribed by Directive 89/108 / EEC 12 . Either packed or unpacked, individually or bulk.

Products not subject to salt curing processes. II.

 $^{^{12}}$ Council Directive 89/108/EEC of 21 December 1988 on the approximation of the laws of the Member States relating to quick-frozen foodstuffs for human consumption.



- Fresh / Chilled Cod: Products not submitted to freezing stages and commercialized in refrigerated conditions. Unlike its predecessors, this is a product that has not been intentionally added any salt, with only natural sodium chloride contents.
- Frozen / Quick-frozen Cod: Those that have been subjected to the action of cold, as established by law to at least -18 °C. Again, no salt has been intentionally added to the product, apart from the use of seawater or diluted brines for washing and glazing steps. Final salt content is generally not higher than 0,5%. Term "quick-frozen" could be applied if it corresponds to the requirements prescribed by Directive 89/108 / EEC.
- <u>Light salted:</u> Cod products with a discrete addition of salt during manufacturing, mainly by injection of brine, in order to obtain a ready to cook product and not for preservation purposes. Since this is a group of products that can be presented as frozen or thawed, and never subjected to salt curing, so the words "desalted" or other terms suggesting a previous salting should not be included in the label.
 - ✓ <u>Chilled.</u> Either unpacked or packed using vacuum packing, modified atmosphere packaging, high pressure processing, etc.. . The name of the product shall be accompanied by the term "defrosted".
 - ✓ <u>Frozen or "quick-frozen".</u> Those that have been subjected to the action of cold, as established by law to at least -18 ° C. Term "quick-frozen" could be applied if it corresponds to the requirements prescribed by Directive 89/108 / EEC. Packed or unpacked in parallel to chilled light salted cod.
- Smoked Cod: Cod products from exposing fish to smoke from smouldering wood or plant materials, either under hot or cold smoking processes (Codex Stan 311 2013. Standard for smoked fish, smoke-flavored fish and smoke-dried fish). Although this process is generally characterized by a combination of salting, drying, heating and smoking, addition of spices, etc.., the level of salt applied to fish is discrete enough not to consider these products as matured in salt. Generally final salt content in these products is not higher than 5 g/100g.
- <u>Smoked-flavored cod</u> are not considered as smoked products since they have not strict undergone smoking processes but an addition of smoke flavor by different techniques. These products shall be included in the Chilled or Thawed cod section.
- <u>Dried Cod (Stockfish):</u> Corresponds to air-dried unsalted cod with moisture contents generally around 20%.
- Rehydrated Stockfish: Rehydrated products from stockfish.



- ✓ <u>Chilled.</u> Either unpacked or packed using vacuum packing, modified atmosphere packaging, high pressure processing, etc.. .
- ✓ <u>Frozen or "quick-frozen"</u>. Those that have been subjected to the action of cold, as established by law to at least -18 ° C. Term "quick-frozen" could be applied if it corresponds to the requirements prescribed by Directive 89/108 / EEC. Generally correspond to packed products.

Vigo, 28th of April, 2015.

ANNEX I: Proposal of commercial names (English, Spanish, Italian).

		Proposed name* (English)	Proposed name* (Spanish)	Proposed name* (Italian)			
Submitted to salt curing	Heavy salted Cod	Salt-cured cod (Wet)	Bacalao salado / en salazón (verde)	Baccalá salinato			
		Salt -cured cod (Medium cure / Semi-dried)	Bacalao salado / en salazón (semi-curado / semi-seco)	Baccalá salinato (semi-secco)			
		Dry salted cod	Bacalao seco-salado.	Baccalá secco			
		Yellow salt-cured cod	Bacalao salado de cura amarilla o "tipo inglés".	Baccalà San Giovanni/ Baccalà Gaspè			
	Desalted Cod	Desalted Cod	Bacalao desalado	Baccalá ammollato			
salt curing	Fresh / Chilled	Fresh / Chilled Cod.	Bacalao fresco/ refrigerado	Merluzzo nordico fresco / refrigerato			
	Frozen / Quick-frozen	Frozen / Quick-frozen Cod.	Bacalao congelado / ultracongelado	Merluzzo nordico surgelato			
	Light salted Cod	Light salted Cod	Bacalao " al punto de sal"	Merluzzo nordico leggermente salato			
9 2							
Not submitted to salt curing	Smoked Cod	Smoked Cod	Bacalao ahumado	Merluzzo nordico affumicato			
	Smoke flavoured cod	Smoke flavoured cod	Bacalao con aroma de humo.	Merluzzo Nordico all'aroma di fumo			
	Stockfish	Dried Cod / Stockfish	Bacalao seco	Stoccafisso			
	Rehydrated Stockfish	Rehydrated Stockfish	Bacalao seco rehidratado	Stoccafisso ammollato			

ANNEX II: Criteria for heavy salted cod in different countries.

Salted fish / Fully salted fish

	Norway	Spain	Portugal	Brasil
		ANFABASA internal document. Repealed regulations: *Resolución del 17 de Octubre de 1968 de la Dirección General de Comercio Exterior por la que se dictan Normas de calidad comercial que regulan el comercio exterior de bacalao y especies similares, salado en verde y salado seco. **ORDEN de 20 de Enero de 1971 por la que se regula el comercio exterior de bacalao y especies similares salado verde y salado seco.	Decreto-Lei nº 25/2005 de 28 de Janeiro. Normas de comercialização para o bacalhau e espécies afins, salgados, verdes e secos. DIÁRIO DA REPÚBLICA — I SÉRIE-A N.o 20 — 28 de Janeiro de 2005.	Ministério da Agricultura, Pecuária e Abastecimento Secretaria de Defesa Agropecuária Portaria № 52, de 29 De Dezembro de 2000. Regulamento Técnico de Identidade e Qualidade de Peixe Salgado.
Wet salted fish		Pescado salado (verde): Bled cod, headed, gutted and partially boned, washed and salted to a salt content of at least 18% and moisture contents higher than 54% by weight. Pescado salado semi-seco (3/4): Fish bled,gutted, headed,, submitted to salt curing with final salt contents over 16%, and dried up to moisture contents between 54% and 50% by weight. *** Wet salted (salado verde) defined as bled, gutted and cutted fish, partially (3/5) deboned, sea water washed and salted at least to a 12% by weight.	Bacalhau salgado verde / espécies afins salgadas verdes: Fish bled,gutted, headed,, submitted to salt curing and with final salt contents over 16% and moisture contents between 51 and 58%.	
Dry salted fish	Klippfisk: Saltfish submitted to drying (generally betwen 2 and 1 week. Klippfisk moisture contents are less than 50% by weight. Based on the degree of drying, products could be divided in: 3/4 torr 7/8 torrr Skipningstorr LagertorrEkstra lagertorrkassetorr Ekstra Kassetor.	Pescado salado seco (7/8): Fish bled,gutted, headed,, submitted to salt curing and with final salt contents over 16% and moisture contents bellow 50% by weight. **Dry salted (salado seco): Wet salted product submited wash of superficial salt,extraction of the black abdominal lining (peritoneum), and subsequently dried (* below 50%). Depending on the final salt content the product can be poor salted, moderate salted and high salted.	Bacalhau salgado semi-seco e espécies afins salgadas semi-secas: Fish bled, gutted, headed,, submitted to salt curing and with final salt contents over 16% and moisture contents between 47 and 51%. Bacalhau salgado seco e espécies afins salgadas secas: Fish bled, gutted, headed,, submitted to salt curing and with final salt contents over 16% and moisture contents below 47 %.	Peixe salgado: Salted fish until a saturation level of 100 %, with or without additives, with moisture contents below 50% for lean species and up to 55% for fatty species. Peixe salgado seco: Salted fish until a saturation level of at least 95%, with or without additives, appropiately dried and with moisture contents below 40% for lean species and up to 45% for fatty species.
Yellow cured cod.		Bacalao salado seco "amarillo" o "tipo inglés": Fish bled,gutted, headed,, submitted to salt curing and including and additional step of partial desalting, with final salt contents from 12% up to 16% and moisture contents bellow 45% by weight.	Bacalhau salgado seco de cura amarela: Fish bled.gutted, headed,, submitted to salt curing with final salt contents between 12% and 16%, and moisture contents below 45%.	

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