

TECHNICAL COMPANION

UN Code 1180

Species, Specifications and the Evidence Behind Acceptance

Fish snapper whole frozen | Educational case study

9 October 2026

This guide analyses the supplied UNSTD-COM 1180 Edition 05, dated 1 April 2024, together with the supplied GEN documents identified below. For a live purchase, use the editions incorporated into the tender or contract and its written amendments. Scientific nomenclature, contractual wording and destination requirements are identified separately.

1. The sourcing decision behind one product code

A request for ‘snapper’ leaves several acceptance questions unresolved. The buyer needs a named species, the required presentation and size, an approved source, a suitable testing plan and matching shipment records. A photograph or familiar commercial name cannot establish all of these facts. This case study follows the connections between the product sheet, supplier validation, laboratory evidence, labels and delivery acceptance. [\[S1-S5\]](#)

The useful lesson is an operational one: translate each requirement into evidence, an owner, a timing rule and an acceptance decision before placing the order. Technical sourcing, quality assurance, logistics and contract administration each hold part of the evidence. An ERP can preserve their approved decisions, but a completed field does not establish that the underlying statement has been checked.

Document	Question it answers
COM 1180	What product, species, dimensions, condition, tests, packaging and delivery warranty are specified?
GEN-01 / GEN-02	Which contaminant controls apply, and what information must labels communicate?
GEN-03 / GEN-04	How is conformity verified, and which source/product combination has been validated?
Shipment and destination documents	Does the evidence identify this consignment and satisfy the applicable import route?

2. Four entries in the clause; many species in the family

FAO’s 1985 Snappers of the World catalogued 103 lutjanid species in 17 genera. This is a dated catalogue count, not a claim about the exact current taxonomic total. COM 1180 names four species entries. A broad family count does not make all snappers contractually interchangeable. [\[S1 §2; S6\]](#)

The supplied sheet contains ‘Lutjunus’ in the first two entries. Accepted scientific usage is Lutjanus. The third entry is correctly spelled agennes. Preserve the original document and resolve any contractual ambiguity in writing rather than silently rewriting its terms. [\[S1 §2; S7\]](#)

Literal entry in COM 1180	Scientific spelling for explanation	FAO common name
Lutjunus sanguineus	Lutjanus sanguineus	Humphead snapper
Lutjunus malabaricus	Lutjanus malabaricus	Malabar blood snapper
Lutjanus agennes	Lutjanus agennes	African red snapper
Lutjanus erythropterus	Lutjanus erythropterus	Crimson snapper

- Require the full scientific name in the supplier specification and reconcile it with labels, source records and laboratory reports.
- Treat ‘red snapper’, a regional trade name or ‘Lutjanus spp.’ as insufficient to identify which permitted species is offered.
- FDA’s 2012-2013 investigation recorded five samples labelled Lutjanus sanguineus that DNA testing identified as Lutjanus malabaricus. This illustrates a documented identity mismatch; it is not a prevalence estimate for all suppliers or proof that every mismatch is intentional fraud. [\[S8\]](#)

3. Presentation, dimensions and physical acceptance

COM 1180 is classified as a high-risk product. It requires a whole, eviscerated, head-on fish, 50-70 cm each. The 2-5 kg figure elsewhere in the sheet describes the primary package’s net mass. No individual-fish kilogram range is specified. A supplier’s weight grade therefore cannot establish compliance with the length requirement. [S1 §§2, 8]

The sheet does not identify total, fork or standard length, and it gives no numeric size tolerance. Agree the measurement method and sampling/acceptance basis before production or dispatch. Do not infer a kilogram equivalent from length or introduce a tolerance that has not been authorized.

Control	Requirement in COM 1180	Evidence to inspect
Presentation and freezing	Whole, eviscerated, head-on; kept deep frozen after freezing.	Approved specification, representative inspection and condition records.
Individual length	50-70 cm each.	Measurements using the agreed length method; no assumed kg conversion.
Texture	No breakdown or pasty texture indicative of decomposition or parasitic infestation; flesh not separated from bones.	Physical inspection using suitable sampling and handling.
Odour/flavour	Free of foreign odours indicative of decomposition, rancidity or feed.	Recorded organoleptic assessment.
Colour	Less than 10% white/yellow areas indicative of dehydration; red-tinted exterior.	Dehydration and appearance assessment; this is not a glazing allowance.
Foreign matter	Absent: matter not derived from the fish.	Inspection record and corrective action where needed.
Frozen integrity	No signs of thawing and refreezing.	Condition inspection reconciled with transport records.
Storage/transport	-18°C to -25°C.	Continuous temperature history, device identity and arrival checks.

4. Microbiology, chemistry and ingredient controls

The essential ingredient is whole snapper. Antioxidants are the other permitted ingredient category, subject to the applicable Codex General Standard for Food Additives database provisions. The sheet does not authorize every antioxidant or any unrestricted dose. Check the actual additive, food category, conditions of use and declaration. [S1 §3]

For the microbiological plans below, n is the number of sample units. The pathogen plans permit no positive unit. For the three-class hygiene plans, c is the permitted number of results in the marginal range between m and M; no result may exceed M. Preserve the full plan, units and analytical target when commissioning tests. 'Pathogenic E. coli' should not silently become a generic E. coli count. [S1 §4; S4 §6.3]

Microbiological parameter	Exact specified plan/limit
Salmonella/Shigella	n=5; c=0; absent in 25 g
Pathogenic Escherichia coli	n=5; c=0; absent in 25 g
Vibrio cholerae	n=5; c=0; absent in 25 g
Vibrio parahaemolyticus	n=5; c=0; absent in 25 g
Listeria monocytogenes	n=5; c=0; absent in 25 g
Staphylococcus aureus	n=5; c=2; m=5×10 ² cfu/g; M=10 ³ cfu/g
Total coliforms	n=5; c=3; m=10 cfu/g; M=10 ² cfu/g

Chemical parameter	Limit	Unit check
Total volatile basic nitrogen	<300 mg/kg	Equivalent to <30 mg/100 g.
Histamine	<10 mg/100 g	Equivalent to <100 mg/kg.

- The chemical inequalities are strictly 'less than'; do not change them to 'less than or equal to'.
- A compliant result concerns the tested samples, method and stated lot. Check sample identity, dates, units, method scope and the link to the shipment; a report title alone proves little.
- GEN-01 adds contaminant requirements beyond these two COM 1180 chemical indicators. A short microbiology report is not the complete required evidence.

5. Packaging, glaze and remaining warranty

If the product is glazed, its declared net contents must exclude the glaze. COM 1180 gives no fixed maximum glazing percentage. A supplier’s 10%, 20% or other commercial glazing claim must not be presented as a universal UN allowance. Verify edible product mass using the appropriate agreed method and keep packaging, glaze and fish mass distinct. [\[S1 §6; S3 §2.2.1\]](#)

Requirement	Specified condition	Practical implication
Primary pack	Layer packaged, food-grade polyethylene, heat sealed; or equivalent recyclable/biodegradable material preserving organoleptic qualities and sanitary integrity.	Confirm material suitability, seal integrity and handling/transport resistance.
Secondary pack	Corrugated paper box or packing protecting primary packs and withstanding transport/handling.	No universal outer-carton kilogram size is stated.
Primary pack net mass	2-5 kg.	Excludes glaze if glazed; does not define each fish’s mass.
Warranty at delivery location	Minimum four months.	Plan remaining warranty at the contractual delivery location, allowing for transport, storage and possible holds.

Approximate nutritional value per 100 g	COM 1180 value
Energy	100 kcal
Protein	20.5 g
Carbohydrate	0 g
Fat	1.3 g

- Four months is the minimum warranty at delivery; the sheet does not state total factory shelf life.
- The nutritional figures are approximate, not additional minimum/maximum analytical acceptance limits. GEN-02 Annex II allows a nutrition-declaration exemption for unprocessed single-ingredient products. [\[S1 §§7-8; S3 Annex II\]](#)

6. GEN-02: reconcile the labels with the supply chain

Labels must be accurate, understandable and securely attached. Supplementary labels must accurately reflect the original information, and primary and secondary labels must not contradict each other. English is the primary language. The UN-specific code, product name and consumption statement may be on either primary or secondary packaging; product and producer information requirements apply to both. [\[S3 §§1-2.2\]](#)

Label check	Evidence and interpretation
UN identity	UN code/product name and 'NOT For Resale. UN CONSUMPTION ONLY'.
Species and production method	Species name; wild-caught or farmed where appropriate. Match to the approved product and source evidence.
Origin	Distinguish primary-ingredient origin from processing that changes the product's nature. A trading address is not catch evidence.
Producer/packer	Producer name, address, country and registration number; appropriate packer name, address and registration number.
Traceability and dates	Lot/batch, production or appropriate packaging date, and minimum durability. Reconcile against reports and packing list.
Weight and storage	Net contents excluding glaze; appropriate storage and use instructions.
Allergens and ingredients	Conspicuous FISH allergen information. Declare actual additives; assess the single-ingredient ingredients-list exemption correctly.

- An operator that only packs or repacks is excluded from GEN-02's producer definition. Do not erase the actual producer by substituting a packer or trader. [\[S3 §§2.2.3-2.2.4\]](#)
- A single-ingredient food may be exempt from an ingredients list when its name is identical to the ingredient name. Do not apply that exemption automatically when an antioxidant or another ingredient is added. [\[S3 Annex II\]](#)

7. GEN-01 and GEN-04: qualify the actual source

GEN-01's fish chapter covers veterinary residues, pesticides and other contaminants, including heavy metals, dioxins/PCB and radionuclides. Agree a relevant analytical scope against the applicable requirements and exposure history. For wild-caught fish, GEN-04 Package 6 expressly links contaminant-testing scope to the FAO area. For farmed product, farming origin and controls also matter. [\[S2 §4; S5 Annex C, Package 6\]](#)

The available GEN-01 is Edition 02, dated 30 October 2011. Its date alone does not prove supersession. Confirm the edition incorporated into the live contract and destination requirements before choosing limits; this guide does not reproduce hundreds of residue entries as a universal current legal panel.

GEN-04 requires the contractor to qualify sources and obtain UN validation for the proposed supplier/product relationship before supply, subject to its defined waiver procedure. Certification must cover the relevant operations. Primary and secondary suppliers are identified separately; an approved intermediary does not automatically validate an unnamed producing source. [\[S5 §§2, 4.1-4.8\]](#)

Validation record	What to check
Annex A1 / A2	Primary and secondary supplier requests, actual business roles and supporting evidence.
Annex B	Mission supplier matrix, proposed products and validation identity.
Registration and certification	Country registration, operational scope, validity and required accredited certification.
Level 1/2 source for this high-risk product	Food safety management certification; Level 2 also requires relevant export-approval evidence.
Level 3 primary supplier	FSMS certification; applicable control plan including CCPs/CPs, PRPs and contaminants; most recent internal and external food safety audits.
Level 4 primary supplier	HACCP/sanitary registration; HACCP plan; applicable control plan, PRPs and contaminants; two years of internal audits; competent-authority inspection/third-party audit reports; contractor food safety audit assessment.

- Validate a secondary supplier separately. GEN-04 Table 2 requires business registration plus Level 1 HACCP/sanitary registration or FSMS; Level 3 FSMS, PRPs/control measures and internal/external audits; or Level 4 HACCP/sanitary registration, HACCP plan, PRPs/control measures, two years of internal audits, competent-authority/third-party reports and contractor assessment.
- The reviewed GEN-04 Table 2 also requires a broker to be ISO 9001 certified. Check the exact incorporated edition and certificate scope; do not treat a broker certificate as validation of its undisclosed primary sources.

8. Package 6: packer plus farmer or fisherman

GEN-04 Annex C maps code 1180 to Package 6. The packer follows §4.9. The second source is the farmer or fisherman. For a fisherman the text lists MSC OR CoC OR RFM OR GSA OR a fisherman licence issued by an official competent authority of the country/region of origin. These are alternatives, not a requirement to collect all five. Check the document’s actual scope and validity. [S5 Annex C, pp14, 31]

Farmer classification	Package 6 evidence
Level 1	National competent health/veterinary authority licence/approval, or BAP, or FSMS.
Level 2	The Level 1 alternatives plus relevant EU/USA export-approval certification.
Level 3	National competent authority licence/approval plus food safety certification: BAP or FSMS.
Level 4	National competent authority licence/approval plus product laboratory report covering microbiological, chemical and contaminant safety parameters, no older than six months.

- For wild-caught product, Package 6 bases the establishment inspection classification on the packer’s country; contaminant-test scope remains based on the FAO catch area.
- For farmed product where farmer and packer countries differ, Package 6 uses the farmer’s country, where the fish was raised, for this classification.
- If packer and farmer are the same entity, the specified §4.9 route still requires evidence of farming activity.
- A sustainability, chain-of-custody or establishment certificate does not automatically replace a mandatory destination catch certificate or the consignment’s sanitary certificate.

9. GEN-03: who tests, when, and before which decision?

Product risk and establishment level combine to determine inspection frequency. For high-risk snapper, Level 1/2 establishments lead to medium inspection; Level 3/4 lead to high inspection. The special Level 4 rule requires comprehensive laboratory analyses for every shipment of high-risk product, with rejection of consignments lacking the required tests. [S4 §§2.3-2.5; S5 §4.9]

Contractor verification	First/new supplier or product	Subsequent frequency
Medium inspection	Full panel, microbiology and applicable authenticity.	Physical / chemical / contaminants / quality, microbiology and authenticity: six-monthly.
High inspection	Full panel, microbiology and applicable authenticity.	Microbiology: three-monthly. Physical / chemical / contaminants / quality and authenticity: six-monthly.
Level 4 high-risk source	Apply the enhanced requirement.	Comprehensive laboratory analyses each shipment.
Suspicion/detected adulteration	Apply §2.5 incident controls.	Authenticity on each batch of each shipment until the risk is considered eliminated.

Evidence package	Owner and content	Timing
Package A	Supplier: microbiology; physical / chemical / contaminant / quality evidence; appropriate certificates, packing list and pre-shipment report.	Microbiology and consignment documents each consignment; other analyses follow the risk frequency.
Package B	Contractor: independent re-inspection/verification, applicable authenticity, original commercial invoice and shipping documents.	Risk frequency; re-inspection before inventory booking, loading and mission shipment.
Combined report and track sheet	Contractor inspection report, physical verification and mission-specific re-inspection tracking.	Report within 48 hours of completed re-inspection and/or receipt; share tracking at least each consumption period.

- Use accredited laboratories and methods within accreditation scope. Separate contractor verification from the supplier's laboratory as far as possible. [S4 §1.3]
- Do not advertise routine DNA testing of every snapper shipment as a universal requirement. Apply §2.5 and the contract's Annex D; its specific 1180 workbook entry was not independently verified in this review.
- Arrival checks reconcile package integrity, labels, lot, warranty, weight, quantities and continuously recorded transport temperature. Missing or inconsistent evidence can prevent release. [S4 §§4.1-4.4]
- GEN-03 §3.8 provides a documented exception: if a supplier refuses Package A laboratory checks in writing, the contractor performs all Package A tests without duplicating them under Package B. This is not a general exemption from testing.

10. Certificates and shipment evidence: purpose and limits

CAC/GL 48-2004, now identified as CXG 48-2004, provides a model sanitary certificate for fish and fishery products, issued by an official or officially recognized body. It identifies the consignment through product/species, processing, net quantity, establishment and destination information. Its attestations address regulatory standing, HACCP-based controls and sanitary production, handling, storage and transport conditions. Reconcile those statements with the actual lot and shipment. The model is not a certificate issued by Codex, a guarantee of DNA identity or a substitute for evidence of lawful fishing. The receiving authority may prescribe a different approved format. [\[S9\]](#)

Evidence	What it supports	What it does not establish alone
Sanitary/health certificate	Official consignment attestations and identity fields.	DNA identity, fishing legality or every contractual quality criterion.
Catch/fishing documentation	Applicable vessel, catch, area and legality evidence.	Product microbiology or a continuous cold chain.
Origin certificate	The origin statement certified under its applicable rules.	That trading, processing and catching countries are identical.
Establishment/FSMS evidence	Approved activity and management-system scope.	Conformity of every lot without verification.
Laboratory report	Results for identified samples, parameters and methods.	Untested hazards or a different lot's conformity.
Packing list / invoice / transport record	Commercial identity, quantities, lot movement and dispatch route.	Sanitary acceptance or source validation by themselves.
Temperature/pre-shipment record	Recorded handling history, device identity and loading checks.	Correct species or all events outside the record's coverage.

- For applicable EU imports, CATCH digital catch certification became mandatory on 10 January 2026. Treat this as a route-specific example; assess product coverage and exemptions. It is separate from the sanitary certificate. [\[S10\]](#)
- COM 1180 §10 prints CAC/RCP 8-2008 (Rev. 3), Recommended International Code of Practice for the Processing and Handling of Quick Frozen Foods; CAC/RCP 52-2003 (Rev. 4), Code of Practice for Fish and Fishery Products; and CAC/GL 48-2004, Model Certificate for Fish and Fishery Products. Check the incorporated reference and current Codex title/status without silently substituting editions. Their scope guides practices; a reference number is not a blanket product approval. [\[S1 §10\]](#)
- Package A lists Halal documentation, and GEN-04 §4.10 makes it mandatory for Halal products. COM 1180 is not titled as a Halal product. Establish applicability from the product and contract rather than automatically adding a Halal certificate to every fish consignment.

11. Hypothetical lot review and clarification checklist

The example below is invented and redacted for training. It is a comparison of records, not an official certificate, audit result or allegation about a supplier. Assume lot [REDACTED-A] is proposed under the reviewed COM 1180 edition.

Requirement/evidence	Hypothetical discrepancy	Decision before release
Approved species	Offer says <i>L. sanguineus</i> ; inner label says <i>L. malabaricus</i> .	Reconcile identity and approval; being named in the same clause does not resolve conflicting records.
Each fish 50-70 cm	Offer gives only a kilogram grade.	Obtain measurements using the agreed method.
Primary pack 2-5 kg net	A 4 kg declaration includes 0.6 kg of glaze.	Verify deglazed mass and correct label/quantity evidence; 4 kg has not been demonstrated as net fish.
Lot-linked laboratory evidence	Report names [REDACTED-B].	Establish the sample-to-lot link or obtain valid replacement evidence.
Catch/packer information	Only a trader's address appears.	Identify catch area and actual packer; confirm source validation and contaminant scope.
Four-month delivery warranty	Projected arrival leaves three months.	Do not treat the factory's total shelf life as meeting delivery warranty.
Transport record	Device identity or part of the journey is missing.	Investigate the gap and obtain a documented quality decision.

- Confirm the contract editions, amendments and approved species / source / product combination.
- Resolve scientific-name spellings, length method, sampling basis and any requested deviation in writing.
- Verify pack mass excluding glaze, actual additives, labels and remaining warranty at delivery.
- Record farmer/fisherman, packer and intermediary roles; reconcile FAO area, origin and establishment identifiers.
- Assign responsibility for Package A, Package B, route-specific certificates, temperature evidence and release.
- Check each record's lot, quantity, validity and purpose. Escalate contradictions before booking accepted inventory or dispatching onward.

Source register

Source identifiers correspond to the references throughout this guide.

S1 UNSTD-COM 1180 FISH SNAPPER WHOLE FROZEN

Edition 05 | 1 April 2024 | Pages 1-2

Supplied complete product sheet read; first two genus entries are printed *Lutjanus*.

S2 UNSTD-GEN-01 Contaminants

Edition 02 | 30 October 2011 | Pages 2 and 26-30

Supplied edition read. Its older date alone does not establish supersession; confirm contract incorporation.

S3 UNSTD-GEN-02 Product Labeling

Edition 05* | 1 August 2024 | Pages 1-9

Complete supplied document read, including Annex II exemptions.

S4 UNSTD-GEN-03 Inspection

Edition 05* | 25 October 2024 | Pages 1-19

Complete supplied document read. Annex D is a separate workbook; its 1180 row was not independently verified in this review.

S5 UNSTD-GEN-04 Certification

Edition 05* | 15 November 2024 | Pages 2-9, 14 and 31

Relevant complete sections read, including Package 6. Older ISO edition references in this source are not silently rewritten.

S6 FAO Species Catalogue, Volume 6: Snappers of the World

1985

Historical count: 103 lutjanid species, 17 genera; common/scientific-name reference.

<https://www.fao.org/4/ac481e/ac481e00.htm>

S7 World Register of Marine Species

Accepted scientific spellings reviewed for the four species records below.

Lutjanus sanguineus

<https://marinespecies.org/aphia.php?id=218487&p=taxdetails>

Lutjanus malabaricus

<https://www.marinespecies.org/aphia.php?id=218481&p=taxdetails>

Lutjanus agennes

<https://www.marinespecies.org/aphia.php?id=276520&p=taxdetails>

Lutjanus erythropterus

<https://www.marinespecies.org/aphia.php?id=276534&p=taxdetails>

S8 FDA seafood species-label investigation, 2012-2013

PDF pages 10 and 12 (FY13 report pages 4 and 6)

Five tested samples labelled *Lutjanus sanguineus* identified as *Lutjanus malabaricus*. Use as a documented mismatch example, not a population prevalence estimate.

<https://www.fda.gov/media/89943/download>

S9 Codex CXG 48-2004: Model Certificate for Fish and Fishery Products

Official model and explanatory scope reviewed. The guide does not create an official certificate or signed attestation.

https://www.fao.org/input/download/standards/10127/CXG_048e.pdf

S10 European Commission: New digital certification system to tackle illegal fishing

12 January 2026

Mandatory EU CATCH implementation from 10 January 2026; assess applicable import/product coverage.

https://oceans-and-fisheries.ec.europa.eu/news/new-digital-certification-system-tackle-illegal-fishing-2026-01-12_en

S11 UN Procurement: Food Rations in Support of United Nations Peacekeeping Operations

Public standards access point. Detailed clauses in this guide are drawn from the supplied source documents and identified editions.

<https://www.un.org/procurement/rations>