

15/10//2015

European Union comments

CODEX COMMITTEE ON FOOD HYGIENE

Forty-seventh Session

Boston, Massachusetts, United States of America,

9 – 13 November 2015

Agenda Item 4: Proposed draft guidelines for the control of nontyphoidal *Salmonella* spp. in beef and pork meat

(CX/FH 15/47/5)

***Mixed Competence
European Union Vote***

The European Union and its Member States (EUMS) would like to congratulate USA and Denmark for leading the work on the proposed draft guidelines for the control of nontyphoidal *Salmonella* spp. in beef and pork meat and for the good progress made. It was a pleasure to host the physical WG on this issue in Brussels in May 2015.

The EUMS would like to submit the specific comments outlined below:

Specific comments

Main document

- Paragraph 4, first bullet point last sentence,
 - Proposal: "~~They are usually prescriptive and may differ considerably between countries.~~"
 - **Justification:** Several other paragraphs already express the flexibility for selecting measures (e.g. paragraphs 8 and 10) and often control measures are very similar (everybody should apply most GHP measures proposed in the guidelines). Deletion of this part, or at least the word "considerably" is therefore proposed.
- Paragraph 4, second bullet point last sentence,
 - Proposal to delete: "~~They have an effect on consumer protection, but the actual degree of protection is unknown.~~"
 - **Justification:** This is not only applicable to hazard-based control measures in our views and therefore does not belong here. The added value of this statement in the guidelines is not clear.

Annex I (beef)

- Title:
 - Proposal: "**Specific** Control Measures for Beef"
 - **Justification:** In line with paragraph 22 of the main document. It also underlines that there are general control measures to be considered e.g. in Section 11 of the main document.
- Section 7.2. table: Footnote numbers should be updated.
- Paragraph 15 (b):
 - The following change is proposed: "If food chain information is available, **indicating the presence of *Salmonella* on the** herds ~~with a high incidence of *Salmonella*~~ **appropriate measures** can **be considered such as segregating the animals and processing them** ~~segregated and processed~~ at the end of the production day, **reduction of the slaughter speed to better prevent faecal contamination and the application of additional hazard-based control measures on the carcasses.**
 - **Justification:** Additional control measures should be recommended for this known high risk group.
- Paragraph 18:
 - The following change is proposed: 18. Routinely cleaning the ~~unloading~~ **lairage** areas, pens and water sources may help reduce cross-contamination. Cleaning of areas when stock is not in the pens and walkways could avoid contamination of cattle through aerosols.
 - **Justification:** unloading docks are already covered in the previous point (para 14), this should be about lairage.
- Paragraph 20 (a) last sentence:
 - It is proposed to put this sentence in a separate bullet point (b).
 - **Justificaton:** Segregation of dirty animals and limiting overspray of water are different measures and should be separated in the document.
- Paragraph 21:
 - The EUMS would like to request clarification on whether the reference to the reduction of the bacterial load is general or specific for *Salmonella*.
 - **Justification:** If specific, it might not be considered as a hazard-based measure.
- Paragraph 33b):
 - It is proposed to delete the term "**decontamination**" in the second sentence.
 - **Justification:** The EUMS do not understand the meaning of 'decontamination' in this paragraph.
- Paragraph 55:
 - Proposal: Merge with paragraph 53 (or put after paragraph 53).
 - **Justification:** Both paragraphs are on bung bagging, which is in our understanding a GHP-based control measure.
- Paragraph 57:

- A new measure b) to prevent the introduction of contamination into the carcass during brisket opening could be considered:
 - b. If the gastrointestinal tract has been punctured causing a major contamination no further work should be carried out on the carcass until it has been removed from the slaughterline otherwise the risk of cross contamination will increase significantly.**
- Paragraph 59 :
 - The following changes are proposed: Changing or ~~sanitizing~~ **disinfecting** the weasand rod between each carcass.
 - Cleaning the weasand to minimize cross-contamination, and chilling it quickly to prevent the growth of ~~Salmonella~~ **Salmonella**."
 - **Justification:** Editorial amendment: Codex language and bacterial names in italics (also to be adjusted in other areas in the document, e.g. 61d, 97, 105, 110)
- Paragraph 65:
 - The following change is proposed: "65. This is the point in the process where detailed inspection of carcasses is carried out. ~~so it is a key point to characterize a healthy carcass."~~
 - **Justification:** There seems to be no added value of this wording. *Salmonella* is not visual.
- Paragraph 67
 - An additional paragraph or an additional paragraph is proposed: "**The need for routine palpations and incisions, with the potential risk of Salmonella cross-contamination, should be weighed against the potential impact on public or animal health by hazards for whom these techniques are applied during post-mortem inspection.**"
 - **Justification:** a risk-based approach should be recommended balancing different risk depending on the epidemiological situation of different hazards.
- Section 9.13 – 9.14
 - A new section with hazard based control measures should to be added after post-mortem inspection and before chilling, following the same scheme as the previous chapters) should be added with reference that these are listed under step 8 – dehyding.
 - **Justification:** The guidelines do not suggest hazard-based control measures (decontamination) of carcasses after evisceration and splitting. It is not clear why this is the case since scientific advice exists on decontamination at this stage (e.g. EFSA opinions) and such practice seems to be common in many countries.
- Paragraph 70:
 - The following change is proposed: "70. Implement temperature control and ~~sanitation~~ **cleaning and disinfecting** procedures (e.g. define and monitor refrigeration parameters so that carcasses reach a temperature that will prevent the growth of *Salmonella*)."
 - **Justification:** The guidelines do not suggest hazard-based control measures (decontamination) of carcasses after evisceration and splitting. It is not clear why this is the case since scientific advice exists on decontamination at this stage (e.g. EFSA opinions) and such practice seems to be common in many countries.

- **Justification:** Editorial amendment.
- Paragraph 79:
 - The following change is proposed: "79. Equipment used for this operation should be adequately ~~maintenance~~ **maintained** and adjusted."
 - **Justification:** Editorial amendment.
- Paragraph 88:
 - Propose to put earlier in the document for example at step 14
 - **Justification:** The recommendation is on carcasses, while this is a section on packaging finished products.
- Paragraph 109: Proposal to delete this paragraph.
 - **Justification:** The section is about mechanical tenderization, therefore, there would not be injection of marinade or brine.
- Paragraph 113, d):
 - The EUMS propose the following addition: "thorough cooking, **where appropriate.**"
 - **Justification:** Due to certain consumption habits, beef is not always thoroughly cooked.

Annex II (pork)

- Title
 - Proposal: "**Specific** Control Measures for Pork"
 - **Justification:** In line with paragraph 22 of the main document. It also underlines that there are general control measures to be considered e.g. in Section 11 of the main document.
- **General editorial comments:** put again "*Salmonella*" in italics (para 22, 27, 37, 102) vs microbial not (para 39) + replace sanitizing and similar by disinfecting and similar (para 20, 26).
- Section 7.2, table: Footnote numbers should be updated.
- Paragraph 16 last sentence:
 - The following change is proposed: "For example the establishment may choose to segregate pigs with a ~~high~~ **known** incidence of *Salmonella* at the end of the day, **reduce the slaughter speed to better prevent faecal contamination and/or apply additional hazard-based control measures on the carcasses.**"
 - **Justification:** Additional control measures should be recommended for this known high risk group.
- Paragraph 24:
 - There is repetition; it is proposed to delete either the 1st or 2nd sentence.
- Paragraph 25:
 - The following change is proposed: "This is the point in the process where the animal is bled. Regardless of the slaughter method, it is important for the establishment to minimize contamination of the carcass during any cut made at this step, avoiding any contamination by opening ~~where the pig is rendered unconscious.~~"
 - **Justification:** Editorial amendment.

- Paragraph 26:
 - It is suggested to replace "limit carcass contact with the floor" by "**avoid** carcass contact with the floor"
 - **Justification:** A slightly stronger wording seems appropriate from a risk point of view.
- Paragraph 33:
 - "33. At the end of the shift, remove all organic material and debris from de-hairing equipment. Consider the importance of mechanical action and cleaning. Chemical cleaners and disinfectants should be selected based on several factors including but not limited to the soil type, equipment materials and water hardness."
 - It should be clarified, what is meant with "soil type"?
- Paragraph 75:
 - The following change is proposed: "75. This is the point in the process where inspection of carcasses is carried out. , ~~so it is a key point to characterize a healthy carcass.~~"
 - **Justification:** No added value. *Salmonella* is not visual.
- Paragraph 77
 - An additional paragraph or an additional paragraph is proposed: "**The need for routine palpations and incisions, with the potential risk of *Salmonella* cross-contamination, should be weighed against the potential impact on public or animal health by hazards for whom these techniques are applied during post-mortem inspection.**"
 - **Justification:** a risk-based approach should be recommended balancing different risk depending on the epidemiological situation of different hazards.