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FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 4

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PROPOSED DRAFT GUIDELINES FOR CONTROL OF *CAMPYLOBACTER* AND *SALMONELLA* SPP. IN CHICKEN MEAT

(N08-2007)

LATE COMMENTS AT STEP 3 SUBMITTED BY:

EUROPEAN COMMUNITY, GUATEMALA, THAILAND, UNITED STATES OF AMERICA, INTERNATIONAL ASSOCIATION OF CONSUMER FOOD ORGANIZATIONS (IACFO)

EUROPEAN COMMUNITY

The European Community and its Member States (ECMS) would like to congratulate Sweden and New Zealand for the important progress made at the working group developing the draft guidelines.

The ECMS welcome the approach taken in the document covering the entire production to consumption continuum, including control measures based on GHP and/or hazard control at each step in the food chain.

The ECMS highly appreciate the work done by FAO/WHO and JEMRA in developing the web-based decision support tool and are in favour of the further development of this tool. In particular, the ECMS support the extension of the scope of the tool to include pre-harvest and post-processing steps in the production to consumption continuum, as requested by the WG.

As for the future of CRD 5 from the 40th session of CCFH, the ECMS consider that this document contains useful information on Campylobacter and Salmonella control and it served as useful background for developing the draft guidelines. However, the ECMS do not see the need for maintaining and updating this document in the future as it does not carry an official Codex status.

The ECMS reiterate their position that the potential use of decontaminants (hazard based control measures) cannot be seen as a replacement of GHP at farm level and slaughterhouses masking poor hygienic practices. Therefore, the ECMS are pleased to note that the draft guidelines make it clear that GHP is a pre-requisite to application of hazard-based controls (paragraph 13).

The ECMS would like to alert the Committee to the impending report of the WHO/FAO expert consultation[1] on active chlorine. That document, when published, will contain a review of decontamination measures with chlorine compounds and is therefore of direct relevance to a number of hazard control measures described in the draft guidelines.

In the EC, detailed scientific assessments have been carried out to evaluate the efficacy and safety of the use of antimicrobial substances for decontamination of poultry carcasses. There are outstanding concerns regarding the potential risks that antimicrobial substances can cause to the aquatic environment, the health of staff working in waste water systems and the operation and performance of sewerage systems and/or waste water treatment plants. The use of antimicrobial substances containing chlorine can also lead to the formation of chloro-organic compounds, several of which are persistent, bio-accumulable or carcinogenic.

Moreover, taking into account scientific information available, it cannot be excluded that the approval of antimicrobial substances may lead to increased antimicrobial resistance in humans.

The ECMS encourage further data collection and research so that both the efficacy of the antimicrobial treatments and the development of antimicrobial resistance as well as possible environmental impact could be fully assessed. EFSA has published a guidance document on the submission of data for this purpose which is being updated.

In addition to the scientific uncertainties and concerns related to the use of antimicrobial substances for decontamination of poultry, the ECMS wish to underline that there is also very strong consumer opposition in the EU to the issue of chemical treatments for decontamination. European consumers are not willing to accept chemical treatments for the decontamination of poultry carcasses when the appropriate level of protection can be achieved without their use.

Due to the above outstanding issues, the ECMS do not support the inclusion of references to antimicrobial treatments in the draft guidelines at this stage. The ECMS propose to keep the draft guidelines at step 3 pending the availability of further scientific information on the efficacy and safety of antimicrobial treatments, including the final report of the WHO/FAO expert consultation on active chlorine.

As for the controls at primary production, the ECMS note that the revised version of Chapter 6.4 of the OIE Terrestrial Animal Health Code *"Biosecurity Procedures in Poultry Production"* is scheduled for adoption at the next OIE General Session in May 2010. Section 8 of the draft guidelines concerning control measures at primary production refers to the OIE text and will need to be reviewed in the light of the revised OIE text before advancing the draft guidelines in the step procedure.

GUATEMALA

Guatemala agradece la oportunidad de poder presentar comentarios al documento de trabajo CX/FH 09/41/4 "Proyecto de Directrices para el Control de *Campylobacter y Salmonella* en la Carne de Pollo", al mismo tiempo felicita la labor realizada por Nueva Zelandia y Suecia con la ayuda de varios países y organizaciones internacionales gubernamentales y no gubernamentales.

Guatemala considera las siguientes observaciones a:

[1] Joint FAO/WHO Expert meeting on the benefits and risks of the use of chlorine-containing disinfectants in food production and food processing, Ann Arbor, USA, 27-30 May 2008

3.1 Ámbito de Aplicación.
Párrafo 9. Estas directrices se aplican para el control de todas las especies de Campylobacter y Salmonella que se pueden contaminar….

Se considera importante que este documento en su ámbito de aplicación debiera referirse solamente a los dos tipos de Salmonella, de importancia para la Salud Pública considerados por la OIE, siendo estas la *Salmonella enteritidis* y *Salmonella typhimurium.* Esto se debe a que debe haber concordancia entre Codex y la OIE a lo largo de todo el documento.

4. Definiciones

LOTE. El subconjunto de una parvada. ~~Un grupo de pollos enviados juntos en un vehículo para ser procesados.~~
Eliminar el resto de la definición debido a que no necesariamente los pollos enviados en un "lote" se tienen que ir a proceso. En países latinoamericanos en las ventas al detalle se venden vivos y son sacados por lotes.

ESTABLECIMIENTO: se sugiere que se coloque **"Establecimiento o granja"** ya que la definición también aplica para las granjas y el término granja es frecuentemente utilizado en la redacción del documento.

RECOLECCIÓN PARCIAL: Se sugiere una nueva definición para recolección parcial, la cual debiera ser: ***Procedimiento por el cual se acopian lotes de una parvada.*** Si no se llega a un acuerdo para una mejor definición se sugiere eliminarla. Por aspectos de semántica se está redundando en Recolección parcial: recolección parcial de los pollos de una parvada en crecimiento. Realmente no da una definición concreta de lo que es recolección.

RECOLECCION TOTAL: Se sugiere una nueva definición para recolección total, la cual debiera ser: **Acopio completo de todos los pollos de una parvada**. Si no se llega a un acuerdo para una mejor definición se sugiere eliminarla. Por aspectos de semántica se está redundando en Recolección total: Recolección total de los pollos de una parvada en crecimiento. Realmente no da una definición concreta de lo que es la recolección.

5. Principios para el control de Campylobacter y Salmonella en la carne de pollo
Párrafo 16. Los principios del modelo **globar** para las buenas prácticas de higiene de la carne…..…..En la traducción al español se cree que la palabra **globar** corresponde a **global** por lo que se sugiere se cambie.

7.1 Diagrama de flujo genérico para la aplicación de medidas de control
Los párrafos 21 y 22 debieran de cambiarse de orden para que haya concordancia y secuencia con lo que se describe después. ¨Primero debiera ir lo descrito en el párrafo 21 y luego lo descrito en el párrafo 22.

Diagrama de Flujo del Proceso: De la producción primaria al consumo

Paso 3 La descripción correcta debiera ser: **Incubación de huevo fértil para producción de aves reproductoras**. Esto debido a que da confusión y un diagrama de flujo describe las actividades de un proceso "incubadora" no es un paso en el proceso.

Paso 7: La descripción correcta debiera ser **Incubación de huevo fértil,** en lugar de Establecimiento**.** Se presta a confusión y "establecimiento" no es un paso en el proceso.

Paso 14. Rastro. Actualmente el término internacionalmente reconocido es Matadero, pero esto tampoco es una actividad dentro del diagrama de flujo de proceso. El termino correcto a utilizar es **Sacrificio**, ya que según el diagrama 2 las actividades ahí descritas corresponden al sacrifico del animal

Paso 15. Presentación/Eviscerado: La terminología correcta sería de **Faenado**. Las actividades descritas en el diagrama 3 corresponden a la faena, la cual incluye el eviscerado.

Paso 21: Debe ir centrado y debajo del paso 20, no a un lado de las actividades.

Paso 25 y 27: se debe colocar que es "transporte refrigerado" Esto debido a que se está hablando de directrices para controlar bacterias y es importante ser lo más específico posible.

Diagrama 3
Se sugiere que el inciso "E" o el paso "E" en el diagrama de flujo del proceso 3 (Paso 15); se traslade al final, después del inciso o paso "I". El oreado en un paso en el proceso que generalmente se hace al final, después del lavado que es cuando escurre.

Numeral 8.1.Manejo de las parvadas
Numeral 8.1.1 Medidas basadas en las BPH
Párrafo 24 Se sugiere que se defina el alcance de la "bioseguridad". No se tiene claro si la bioseguridad también abarca la "sanidad animal" porque esta medida también sirve para controlar la S*almonella* y *Campylobacter*.

Numeral 8.2 Transporte de los huevos a la incubadora
Numeral 8.2.1 Medidas Basadas en la BPH
Párrafo 29. Solo deberían enviarse a incubar aquellos huevos de parvadas que ~~no presenten Salmonella (negativas para).~~
Se sugiere una mejor redacción para este párrafo que podría quedar así: **Solo deberían enviarse a incubar aquellos huevos de parvadas que hayan salido negativas a las pruebas de Salmonella.**

Numeral 9.4.1.2 Desplumado
Párrafo 50, última viñeta:

- Reemplazo seguido de los dedos de la desplumadora.

La palabra "seguido" es muy ambigua por lo que se sugiere: **Reemplazo programado o bajo verificación de funcionamiento de los dedos de la desplumadora.**

Numeral 9.13 Almacenamiento
Párrafo 90. Los productos deberían ser almacenados a temperaturas que prevengan el crecimiento de la Salmonella.
Se sugiere que se indique o se recomiende cual es la temperatura adecuada para que se prevenga el crecimiento de la Salmonella, ya que esta es una directriz y no se debe dejar a criterio de cada quién, máximo cuando se está tratando de controlar bacterias de importancia para la salud pública.

Numeral 10.4.1 Venta al detalle
Párrafo 94.Luego de manipular carne cruda de pollo todos los individuos deberían lavarse y desinfectarse las manos**.**

Se sugiere que el párrafo quede de la siguiente manera: ***Antes y Después de manipular carne cruda de pollo todos los individuos deberían lavarse y desinfectarse las manos***. *Es importante recalcar,*

recordar e insistir en lavarse las manos antes de manipular cualquier alimento, esta actividad se debe de llevar a cabo no solamente después de manipular la carne.

Numeral 10.6 Consumidor
10.6.1 Medidas basadas en las BPH
Párrafo 105. Los consumidores deberían lavar y desinfectar las superficies de contacto luego de haber preparado pollo crudo, para reducir significativamente la posible contaminación cruzada en la calle:

Se sugiere que el párrafo quede de la siguiente manera: ***Los*** **consumidores deberían lavar y desinfectar las superficies de contacto <u>Antes y Después</u> de preparar pollo crudo, para reducir *significativamente la posible contaminación cruzada en la calle.*** *Es importante recomendar que las superficies que vayan a entrar en contacto con los alimentos deban estar limpias y desinfectadas antes de su uso. La contaminación cruzada no solamente existe después de preparar el pollo si no también cuando colocamos este sobre una superficie contaminada.*

Párrafo 106. Se sugiere que se indique el tiempo de cocción para lograr la temperatura interna mínima de 165°F(74°C). Ya que solamente indica que se bebiera cocinar el pollo de acuerdo a un proceso que sea capaz de lograr una reducción del 7 log10 y la nota a la que hace referencia el pie de página indica a que temperatura debe hacerse pero no por cuánto tiempo.

Numeral 11.1 Desarrollo de las medidas de control basadas en el riesgo
Párrafos 110 y 111 Se sugiere por aspectos de semántica y mejor comprensión que en lugar de la palabra ***<u>modelaje</u>*** *de riesgos se utilice "****Modelo de riesgos"***

Numeral 12.5.1 La Industria
Párrafo 131 La verificación por parte de la industria debería demostrar que se han implementado como se pretende todas las medidas de control para Campylobacter y/o Salmonella.

Se sugiere*: La verificación por parte de la industria debería demostrar que se han implementado como se pretende todas las medidas de control para Campylobacter y/o Salmonella,* ***de acuerdo a lo que establece la normativa nacional.*** *Agrega****r "de acuerdo a lo que establece la normativa nacional"*** al final del párrafo debido a que en ésta se deben establecer las medidas de control.

Numeral 13 Monitoreo y Revisión
Párrafo 133. El monitoreo y revisión de los programas de control de la inocuidad de los alimentos es un componente esencial de la aplicación del marco de la gestión de riesgos (MGR). Ya que se contribuye a la verificación del control de proceso, así como para demostrar el progreso hacia el logro de las metas de la salud pública.

Se sugiere: El monitoreo y revisión de los programas de control de la inocuidad de los alimentos es un componente esencial de la aplicación del marco de la gestión de riesgos (MGR). Ya que se contribuye a la verificación del control de proceso, **haciendo monitoreo para determinar los posibles lugares de contaminación,** así como para demostrar el progreso hacia el logro de las metas de la salud pública.

Numeral 13.1
Monitoreo
Agregar una viñeta donde indique:
Se debieran monitorear las Materias Primas que se utilizaran en alimentos balanceados ya que estos pueden venir contaminados.

Numeral 13.2 Revisión
Párrafo 143. Donde el monitoreo de los peligros o de los riesgos indican que las metas ~~de~~ regulatorias de rendimiento no están..…..
En la traducción al español Se sugiere eliminar la palabra "de" y dejar solamente metas regulatorias. Por aspectos de semántica no está bien dicho "metas de regulatorias"

En la traducción al español se sugiere cambiar la palabra "eses" por la correcta "heces" ya que está mal escrita.

THAILAND

Thailand acknowledges the effort of the working group led by Sweden and New Zealand in drafting this document. Generally, Thailand supports the guidelines that have been developed for control of *Campylobacter* and *Salmonella* spp. in chicken meat. And, we are pleased to provide the following comments.

Specific comments

3.1. Scope (paragraph 9)
We are of the opinion that serotypes of Salmonella which are regularly found and generally cause foodborne illness in various countries are *Salmonella enteritidis* and *Salmonella typhimurium*. This is in line with what is mentioned in Article 6.5.2 Purpose and scope of OIE-Terrestrial Animal Health Code, Chaptor 6.5: Prevention, Detection and Control of Salmonella in Poultry as followings:
"6.5.2 Purpose and scope (OIE- Terrestrial Animal Health Code)
The recommendations presented in this chapter are relevant to the control of all Salmonella with special attention to *S. Enteritidis* and *S. Typhimurium*, as these are common Salmonella serotypes in many countries."
Thus, we would like to propose an amendment as follows:
"3.1. Scope
9. These Guidelines apply to control of all *Campylobacter* and *Salmonella*, <u>with special attention to *S. Enteritidis* and *S. Typhimurium*</u>, that may contaminate chicken meat (*Gallus gallus*) and cause food borne disease. The primary focus is on chicken meat in the form of broiler carcasses and portions, with the exclusion of offals. These guidelines can be applied to other classes of chickens, e.g. end-of-lays, as appropriate."

3.2. Use
7.2. Availability of control measures
8. Control measures for Steps 1 to 11 (Primary Production)
For the benefit of the user of this guideline and clarification of the control measure, the specific Chapter and Article of OIE Code should be added to each Measure based on GHP of each step that is referring to OIE Code in Section 8.

7.1. Generic flow diagram for application of control measures
We would like to recommend an amendment of the length of the brackets "}" to indicate primary production (step 1-11), processing (step 12-24), and distribution channels (step 25-30) as mentioned in Section 8, 9 and 10

9.5 Step 16: Inside/outside wash

9.5.1 Measures based on GHP (paragraph 64)
By using brushing apparatus installed in line with the inside/outside wash, the pathogens might be accumulated on the apparatus. So, we are of the opinion that the last sentence of paragraph 64 might be deleted or otherwise added the text specified that there is a control measures to prevent the accumulation of pathogens.

14. Scientific References

Putting Scientific References as part of the Guidelines are uncommon Codex format. So, we are of the view that the references to the scientific literature should be consistent with the other Codex Guidelines.

UNITED STATES

General Comments

The United States recognizes the progress made to date on the draft guidelines and supports the continued development of these guidelines in accordance with the original purpose for which they were developed, i.e., to provide an all-inclusive approach toward the various interventions for the control of *Campylobacter* and *Salmonella* in chicken meat. Therefore, we believe that the data supporting the use of chemical interventions during processing, which was contained in previous versions of the document and subsequently deleted, should be reinserted.

In addition, the United States recommends the working group consider the following supporting information that may not have been evaluated or previously available.

Specific Comments

1. Step 11: Transport to slaughter house - Sec. 8.11.1, Measures based on GHP

Paragraph 43: There is research suggesting that cleaning and sanitizing cages is important also for minimizing *Salmonella* cross-contamination during transport to slaughter facilities. The United States proposes the GHP measures in section 8.11.1 on cleaning and sanitizing transport cages are applicable to *Salmonella* control as well. Therefore, we believe the heading under 8.11.1 should read, "For *Campylobacter* and *Salmonella*."

1. Corry, JEL, Allen, VM, Hudson, WR, Breslin, MF and RH Davies.2002. Sources of *Salmonella* on broiler carcasses during transportation and processing: modes of contamination and methods of control. Journal of microbiology. 92: 424-432.
2. Rigby, C.E. & J.R. Petit. 1980. Changes in the *Salmonella* status of broiler chickens subjected to simulated shipping conditions. Can.J. Comp.Med 44:374-378.

2. Step 12: Receive at slaughterhouse - Sec 9.1.1, Measures based on GHP

Paragraph 47: The United States believes these statements are also applicable for *Campylobacter*. Therefore, the heading above paragraph 47 should read, "For *Salmonella* and *Campylobacter*"

1. Allen, V. M., Corry, J.E.L., Domingue, G., Jorgensen, F., Frost, J.A. Whyte, R., Gonzalez, A., Elviss, N., and T.J. Humphrey. 2007. Campylobacter spp. contamination of chicken carcasses during processing in relation to flock colonization. International Journal of Food Microbiology 113: 54-61.

3. Step 15: Dress - Section 9.4.2: Measures based on hazard control

Paragraph 63: In keeping with the original intent of this document, the United States recommends reinserting information on Trisodiumhosphate (TSP) as an intervention during dressing thereby providing information on many potentially relevant interventions. This will enable each country to choose from a variety of approaches in developing risk management strategies they deem appropriate for their own particular situation.

The technical expert group's comment that TSP should be excluded because "it is rarely used in poultry processing" conflicts with the original intent of the document, which, again is to be inclusive of the different control measures and provide countries with the information necessary to decide which control measures to use.

Furthermore, as environmental concerns fall outside the purview of Codex Alimentarius, the United States questions the appropriateness of taking the expert group's comment that there are negative environmental impacts from the use of phosphates. The United States recommends the paragraph read:

Trisodium Phosphate (TSP): TSP used in pre- or postchill application has in experiments as well as under natural conditions been shown to achieve a 1-2 log reduction of *Salmonella* (Salvat et al, 1997 ref 250; Rio et al 2007, ref 487; Yang et al 1998, ref 550; Fabrizio et al 2002, ref 350; Xiong et al 1998, ref 544; Wei Chi et al 1997, ref 526; Lillard 1994, ref173; Jeong Weon et al 1994, ref 154; Rodriguez De Ledesma et al 1996, ref 581; Ozdemir and Pamuk 2006, ref 466).

Paragraph 63: The United States proposes that research by Northcutt, et al referenced in the 2008 draft be reconsidered relative to the effectiveness of chlorine in spray wash against both *Campylobacter* and *Salmonella*. The United States suggests the following wording:

Spray washing poultry carcasses with electrolyzed oxidizing water (EO) or sodium hypochlorite (HOCL) for 5-10 seconds significantly reduced levels of *Salmonella* (2.0 and 1.2 log cfu/ml, respectively) and *Campylobacter* (5.2 and 4.2 log cfu/ml, respectively) when compared to unwashed carcasses (3.9 log cfu/ml (*Salmonella*) and 6.3 log cfu/ml (*Campylobacter*) (Northcutt, et al, 2007).

1. Nothcutt, J., Smith, D. Ingram, K.D., Hinton, A., and M. Musgrove 2007. Recovery of bacteria from broiler carcasses after spray washing with acidified electrolyzed water or sodium hypochlorite solutions. 86(10): 2239-2244.

4. Step 17: Online reprocessing - Section 9.6.1: Measures based on hazard control

Paragraph 67: The United States recommends including statements on the effectiveness of Trisodium Phosphate (TSP) and Acidified Sodium Chlorite (ASC) against *Campylobacter*. The United States suggests the following wording:

Commercial washer systems, on average, reduced *Campylobacter* by log 0.5 cfu/ml. Systems using processing aids such as 12% Trisodium Phosphate (TSP) at pH 11 and contact time of 15 seconds and Acidified Sodium Chlorite (ASC) at 1200 ppm, pH 2.5 and 0.04L per bird and contact time 15 seconds, further reduced *Campylobacter* on average by log 1.03 (TSP) to log 1.26 (ASC). (Bashor et al, 2004) Ref 662

1. Bashor, M.P., Curtis, P., Keener, K.M., Sheldon, B.W., Kathariou, and JA Osborn. 2004 Effects of carcass washes on *Campylobacter* contamination in large broiler processing plants. Poultry Science, 83:1232-1239.

5. Step 19: Chill carcass (air or immersion) – Section 9.8.1.2: Immersion chilling

Paragraph 72, bullet 2: The United States recommends adding peracetic acid to the list of examples

1. Bauermeister, L.J., Bowers, J.W.J., Townsend, J.C., and S.R. McKee. 2008. The microbial and quality properties of poultry carcasses treated with peracetic acid as an antimicrobial treatment. Poultry Science, 87: 2390-2398.

6. Step 19: Chill carcass (air or immersion) - Section 9.8.2: Measures based on hazard control

Paragraph 77: The United States recommends including statements regarding the effectiveness of chlorine and chlorine dioxide in reducing bacterial counts of carcasses – and if accepted, identify them as such in the table under Section 7.2. The United States recommends that the statement read:

Research by Lillard (1980) demonstrated that chill water treated with 20 ppm or 34 ppm chlorine (Cl2) or 5 ppm or 3 ppm chlorine dioxide (ClO2) had significantly fewer bacterial counts than untreated chill water.

1. Lillard, H.S. 1980. Effect on broiler carcasses and water of treating chiller water with chlorine or chlorine dioxide. Poultry Science 59: 1761-1766.

IACFO

The International Association of Consumer Food Organizations (IACFO) is an association of a dozen national non-governmental organizations from all over the world that represent consumer interests in the areas of nutrition, food safety, and related food policy matters. IACFO members work on food policy concerns unique to diverse populations and regions, such as India, Uganda, Malaysia, Japan, and others. We respectfully submit the following comments for consideration at the Forty first Session of the Codex Committee on Food Hygiene.

IACFO would like to commend the working group for the progress that has been made on the draft document, and would like to thank the hosts, the Brazilian, Swedish and New Zealand governments, for their excellent leadership.

AGENDA ITEM 4: PROPOSED DRAFT GUIDELINES FOR THE CONTROL OF *CAMPYLOBACTER* AND *SALMONELLA* SPP. IN CHICKEN MEAT AT STEP 4

IACFO recommends including provisions it deems necessary to better protect consumers from contracting *Campylobacter* and *Salmonella* from improperly produced and/or mishandled chicken meat. These provisions call for the inclusion of stronger language on labeling and for the encouragement of effective recall systems.

Section 10: Control Measures for Steps 25-30 (Distribution channels)
Labeling is briefly discussed as a measure to improve public health, but must be further explained. We ask that retailers as well as others along the food chain should be specifically included in the following section regarding labeling:

10.4.1.1 Retail
IACFO recommends adding a provision that underlines the importance of labeling for all parts of the food chain, not just consumers, to reduce risk of *Campylobacter* and *Salmonella* contamination. After step 95, an additional step should be added:

> "Where product is packaged at retail for individual selection by consumers, the package should be labeled with clear instructions to enable the next person in the food chain to handle, display, store and use the product safely."

This provision should be based on language present in the 2003 report of the ninth session of the Codex Committee on Meat and Poultry Hygiene, which reads:

> Appropriate product information and adequate knowledge of food hygiene is necessary to prevent mishandling at the later stages in the food chain. Pre-packaged foods should be labeled with clear instructions to enable the next person in the food chain to handle, display, store and use the product safely.

11.2 Availability of a web-based decision tool
IACFO supports the development of a web-based decision tool. The developed tool should be made available and easily understandable by non-technical users.

SECTION 12: IMPLEMENTATION OF CONTROL MEASURES

12.5.2 Regulatory systems
Paragraph 132 calls for preventative regulation, but IACFO believes that a subsequent step should be added that allows competent authorities to effectively mandate a recall in case of the failure of preventative measures. Thus step 133 should be based on the recall language found in the 2003 report of the ninth session of the Codex Committee on Meat and Poultry Hygiene, which reads:

> Establishments should have adequate systems that enable the tracing and withdrawal of product from the food chain. The competent authority should require verification that the systems are adequate. In the case of a recall, communication with consumers and interested parties should be considered and undertaken where appropriate.

13.1 Monitoring

IACFO believes that a subsequent step should be added that allows competent authorities to effectively mandate a recall in the case that monitoring information from the food chain shows presence of contamination. Step 140 should include recall language based on the 2003 report of the ninth session of the Codex Committee on Meat and Poultry Hygiene, which reads:

> "In the case that the monitoring information shows presence of pathogenic contamination, there should be an adequate system in place that enables the tracing and withdrawal of the product from the food chain. Communication with consumers and other parties should be considered and undertaken appropriately."