

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 3

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON MEAT AND POULTRY HYGIENE
Ninth Session
Wellington, New Zealand, 17-21 February 2003**

PROPOSED GENERAL PRINCIPLES OF MEAT HYGIENE

Comments at Step 5 and 6

Comments from: Consumers International

in response to CL 2002/06-MPH, Part A “and CL 2002/31-MPH “

General Remarks

CI would welcome further discussion of the term ‘suitable’ and how it differs from the term ‘wholesome’, a traditional term of food hygiene. CI appreciates that the term “food suitability” is used in the Codex General Principles of Food Hygiene *CAC/RCP 1-1969, Rev. 3-1997, Amd. (1999)*, the current version of which was adopted by the Commission in 1997, with minor amendment in 1999. Nonetheless, since then not only have primary production and meat manufacture practices and national regulatory requirements and structures changed, but so have consumer practices and expectations about the consumer role in food hygiene. CI believes that a re-examination of the General Principles of Food Hygiene, which forms the foundation of this document, is warranted, particularly as the GPFH regards the roles of different stakeholders in ensuring safe food, and in light of further developments in incorporating risk analysis principles into the work of Codex. CI believes that the roles of all of the stakeholders in this principle should be updated and specified. CI proposes that CCMPH recommend to the Codex Committee on Food Hygiene that it consider such a re-examination.

CI's believes that a review of the rationale for the shift from the traditional term “wholesome” to “suitable” and its variants may provide needed context for the discussion over the role and definitions of inspection and enforcement in food hygiene, evident at the Eighth Session. The range of comments received by CCMPH on these roles and definitions reveal a difference of opinion about whether governments can delegate competent authority to industry employees or to third parties and still provide reliable evidence that food is fit and safe for human consumption. The recent increase in the number and magnitude of meat and poultry product recalls is grim testimony to the failure to produce food that is safe and fit for human consumption. CCMPH should discuss inspection and enforcement definitions and issues in light of this grim testimony.

CI believes that resolution of these issues over inspection, enforcement and related matters can best be achieved through further discussion of the draft Code of Hygienic Practice, in which many draft definitions, such as “inspector,” “suitable for human consumption” and “verification” are bracketed in whole or in part. In our view, the Principles and the Code should be discussed and advanced interactively, lest Principles already advanced inhibit a thorough discussion of the practices for which the Principles are a statement of purpose. CI believes that the next CCMPH session should focus its attention on improving the draft Code to which the Principles will be subordinated, particularly because many of the definitions of terms used in the draft Principles remain in brackets in the draft Code. Despite our preference for focusing on the rest of the draft Code, CI submits the following comments on Principles language, with proposed changes put in *italics*.

First principle

CI would partially redraft the first principle to read: “Meat must be safe [*and wholesome/suitable*] for human consumption and all interested parties including government, industry, and consumers have roles to play in achieving this outcome.”

Rationale: The shift from “safe and wholesome,” the traditional description in many countries of what food safety policies try to achieve, to “safe and suitable” comes with the shift of Hazard Analysis Critical Control Point (HACCP) from a quality assurance program to a food safety program of industry self-control monitored by competent authority. The difference of opinion in CCMPH over the meaning of such terms as “official inspector” in the draft Code pertains to this shift in the function of HACCP. CI has put its proposed change in brackets to signify the need for a discussion about the historic shift in HACCP, in order to address differences of opinion about how competent authority is to protect consumer health. CI believes that a discussion of the bracketed terms may lead to a better understanding of the differences of opinion over inspection and enforcement issues and definitions in the draft Code.

Second principle

CI believes that the competence of competent authority not only resides in legal statutes, but also in administrative means to enforce regulatory requirements pursuant to those statutes. Therefore CI recommends the following changes: “The competent authority should have the legal power *and administrative means* to set and enforce regulatory meat hygiene requirements, and have final *responsibility to verify that establishments are following hygienic practices and to inspect meat and poultry products to identify and remove unsafe food. This authority and responsibility should not be delegated to establishments or to certified third party agents except as allowed by statutory law.* It should be the responsibility of the establishment operator to produce meat that is safe, [*wholesome/ suitable*] and in accordance with regulatory meat hygiene requirements. There should be a legal obligation on relevant parties to provide *in a timely fashion* any information and assistance as may be required by the competent authority.”

Rationale: The purpose of the above changes is to clarify and strengthen language on the role of the competent authority in achieving the outcome of producing safe food for human consumption.

Third principle

Because inspection of animals presented for slaughter and of meat products can be an essential means for the competent authority to enforce meat hygiene requirements, the role of inspection should be explicit in the Principles. Furthermore, as the characterization of microbiological hazards still suffers from many data gaps, we do not believe that “all relevant food safety hazards” adequately portrays the current state of microbiological hazard knowledge. Therefore, CI would amend this principle, as we urged in comments to the eighth session, to read “Meat hygiene programmes should have as their primary *outcome* the protection of public health and should be based on scientific evaluation of meat-borne risks to human health and take into account all relevant food safety hazards, *including new and emerging risks where scientific data still may be incomplete*, as identified by research, *inspection*, monitoring and other relevant activities.”

Fourth principle

In its comments to the Eighth Session, CI stated: “We support principle 4, including the “wherever possible and appropriate” language, in recognition of the fact that risk management uses the results of risk assessment, which in the microbiological context is still a new discipline, and that the best way to achieve meat hygiene objectives, particularly in developing countries, may be through more fundamental improvements and adherence to good hygienic practices.” In recognition of the importance of the interactive nature of risk management, risk assessment and risk communication in protecting public health, CI would amend this principle to read: “The principles of food safety risk *analysis* should be incorporated wherever possible and appropriate in the design, implementation *and enforcement* of meat hygiene programs *in order to protect public health.*”

Fifth principle

CI supports retaining this principle in brackets.

Sixth and seventh principles

In its comments to the eighth session of CCMPH, CI urged that such qualifiers as “wherever appropriate” and “wherever possible and practical” be clarified. This clarification needs to occur in the Code, and we believe that further discussion of how/where it should be clarified in the Code can lead to a more precise principle about how information about primary production is to be gathered and analyzed in order to better coordinate meat hygiene and animal husbandry requirements to protect consumers from the “spectrum and prevalence of hazards in the animal population from which the meat is sourced.” CI suggests to amend the seventh principle to state “the HACCP principles should be applied in the design, *implementation and enforcement* of hygiene measures throughout the entire food chain.”

Eighth principles

The eighth principle suggests that to a certain extent voluntary quality assurance programs can be used to verify regulatory requirements, such as conformity with the HACCP plan of an establishment. The italicized wording accompanying the principle further explains that “*competent authorities may take properly functioning QA systems into account when carrying out their regulatory responsibilities, e.g. by decreasing the frequency of HACCP verification checks.*” CI believes that the functioning of QA systems does not allow the competent authority to reduce its enforcement of food safety regulations. CI believes that a principle that advocates adducing evidence from voluntary QA systems not subject to regulatory monitoring and enforcement for the purpose of determining conformity with regulatory requirements is unacceptable. Furthermore, while QA systems can be useful, we do not think this concept deserves the status of a “principle.” CI recommends that the principle be deleted. Information about the proper role of QA systems could appear elsewhere in the Code.

Ninth and tenth principles

The distinction between the role of public employees and the employees of establishments in performing specific functions related to meat hygiene needs to be clarified in the Code. Accordingly, CI proposes the following amendments to the ninth principle: “The range of activities involved in meat hygiene should be carried out by personnel with the appropriate training, knowledge, skills, ability *and technology* as and where defined by the competent authority. *These definitions should be specified by competent authority for public employees, establishment employees and certified third party agents.*”

For the aforementioned rationale, CI proposes the following amendments to the tenth principle: “The competent authority should define the *roles of public employees, establishment employees and certified third party agents* involved in meat hygiene activities.

Eleventh principle

CI believes that efficient, thorough and rapid systems for recall and traceback are not at the discretion of the establishment, but are essential legal requirements to protect consumer health. Furthermore, the competent authority should work with industry and consumers to ensure that recalls and the results of the tracebacks of unsafe products are widely and promptly publicized to ensure that consumer health is protected. Consumers have become ill and even died when such information was not promptly communicated.

Recognizing that some terms underlying the principle, such as “verification,” remain in square brackets in the draft Code, CI proposes the following amendments: “The competent authority should verify that the establishment operator has adequate systems in place to trace and withdraw *unsafe or potentially unsafe meat products* from the food chain. *The competent authority should monitor the history of the operation of such systems to ensure that any failings in the systems can be remedied.* Timely notification and communication with consumers, *public health authorities*, and other interested parties *about recalls of unsafe or potentially unsafe product should occur, in accordance with national requirements.* *A risk communication program should be developed by the competent authority in consultation with all interested parties.*

Twelfth principle

CI proposes that this principle be strengthened, as follows: “*Monitoring and surveillance of meat products, human populations and slaughter animals should be a continuous activity of the competent authority within a meat hygiene program in a robust food safety system to determine whether existing policies and procedures are effective in preventing and reducing health risks associated with meat and meat products. State of art technologies should be employed to equip government inspectors, industry employees and public health agencies to obtain valid and reliable data for these ongoing evaluation purposes.*”

Thirteenth principle

CI believes that this principle should acknowledge the technical difficulties in determining equivalency. CI suggests that this principle read: “*Competent authorities should recognize the equivalence of alternative hygiene measures, where feasible and appropriate, and promulgate, implement and enforce meat hygiene measures that protect the health of consumers and ensure fair practices in the trading of meat.*”