

# codex alimentarius commission



FOOD AND AGRICULTURE  
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JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

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: Canada, Germany, New Zealand, Switzerland, United States, European Community and the International association of Consumers Food Organizations - IACFO in response to CL 2002/06-MPH, Part A “and CL 2002/31-MPH “

**General remarks**

**SWITZERLAND<sup>1</sup>**

Although the explanatory text in italics after each principle was informative to understand the background of each statement, it should be deleted in the next version. The principles need to be self-explanatory.

**IACFO**

The purpose of meat hygiene is assuring public health protection. The goal should be meat that is clean, safe and unlikely to cause food-borne illness. This requires a credible government inspection program, performance standards for the reduction of pathogens, and adequate enforcement authority. We urge the Committee to assure that these goals are fully reflected and addressed in both the Draft Principles and the Draft Code.

The Report of the Eighth Session of the Codex Committee on Meat and Poultry Hygiene (page 4) states that the Committee agreed that the italicized text accompanying each of the principles was useful for information purposes and therefore retained it for the time being, with a final decision on the retention or deletion of the text to be taken at a future meeting. We encourage the Committee to retain the italicized text accompanying each of the principles since it provides needed clarification and emphasis of each principle and removes certain ambiguities.

**Principle 1**

1. Meat must be safe and suitable for human consumption and all interested parties including government, industry and consumers have a role in achieving this outcome.<sup>1</sup>

*This draft principle addresses the primary goals of meat hygiene i.e. meat must be both safe and suitable for human consumption. In a risk-based, farm-to-plate meat hygiene system, all interested parties i.e. industry, government and consumers, have a role to play in ensuring safety and suitability.*

<sup>1</sup> Specific meat hygiene requirements should address biological, chemical and physical hazards; and pathophysiological and other characteristics associated with suitability for human consumption

## CANADA

Canada suggests to add producers to the list of stakeholders having a role in achieving the outcome. To identify the producers in the list does carry forward the increased importance of on-farm food safety practices. As well, it is not usually understood that producers are included in the industry category. Hence the principle could read:

*Meat must be safe and suitable for human consumption and all interested parties including government, **producers**, industry and consumers have a role in achieving this outcome.*

## SWITZERLAND

Principle 1 states that "*meat must be safe and suitable for human consumption*". It is not quite clear how this general requirement must be understood with regard to pathogenic microorganisms (zoonotic agents). Does it mean that raw (fresh) meat must be safe for human consumption? If this would be the case, pathogenic bacteria such as *Salmonella*, *Campylobacter* and EHEC would have to be absent in 25 grams of raw meat. However, such a requirement is not realistic. It is well known that some categories of raw meat (for example poultry meat) are quite frequently contaminated with pathogenic microorganisms. There is no doubt that efforts should be made to reduce the contamination rates of pathogens on raw meat and especially on poultry meat. However, pathogen-free meat cannot be guaranteed on a large scale on the market. For this reason, Swiss Food Authorities recommend the consumers to consider raw meat as microbiologically unsafe and to handle it accordingly in the kitchen.

Correct meat-handling in the kitchen means among other things the application of an adequate heat-treatment. Exceptions from this general rule are certain raw meat dishes such as "Beefsteak Tatar". These foods are considered to be "ready-to-eat" by the authorities and have to meet microbiological criteria decreed in the Ordinance on Hygiene. Pathogens such as *Salmonella* and *Campylobacter* must be absent in 25 grams and *E. coli* (hygiene indicator) should not exceed 100 cfu per gram. In practice, however, it is impossible to analyze every batch or portion of raw meat before it is eaten and to warrant safety. For this reason, Food Authorities do not consider raw meat dishes to be completely safe in their consumer recommendations.

We hope that the concerns expressed in this comment can be addressed by the working group either by differentiating the wording of principle 1 or by some modification of the definitions for "Meat" or "Safe for consumption" in the "Proposed Draft Code of Hygienic Practice for Fresh Meat" at step 3. In this context, it might be clarifying to introduce the term "ready-to-eat". This term is in so far legitimate as Principle 6 of the "Proposed Draft General Principles of Meat Hygiene" stipulates hygiene measures along the entire food chain. The endpoint of the food chain is the plate with the ready-to-eat meat, which is seldomly raw and mostly heat treated.

## UNITED STATES

The U.S. has no objection to use of the term *suitable for human consumption* with the understanding that its meaning ensures meat is processed under sanitary conditions, and meets meat hygiene standards established by the competent authority for processing defects and gross pathology that could make meat unsuitable for human consumption even though it might be safe. The term does not encompass production practices employed to meet preferences by individual countries (e.g., safe use of growth hormones in cattle).

## EUROPEAN COMMUNITY

The term 'industry' does not clearly cover primary production. Primary producers however play a very important role as regards the safety of meat. Principle 1 should therefore be amended as follows:

Meat must be safe and suitable for human consumption and all interested parties including government, *primary production*, industry and consumers have a role in achieving this outcome.

Apart from this, it should be considered whether the words 'meat establishment operators' would be more appropriate than the word 'industry', as the words 'meat establishment operators' cover more clearly the small and traditional meat establishments.

**IACFO**

Principle 1 should be broadened to recognize the role of consumers, as end-users of fresh meat, in defining what constitutes meat that is safe and suitable for human consumption. We urge that Principle 1 be revised as follows:

“1. Meat must be safe and suitable for human consumption and all interested parties, including government, industry and consumers, have a role in achieving this outcome. *Consumers, as the end-users, have an important role in defining the appropriate level of health protection for fresh meat.*”

**Principle 2**

2. The competent authority should have the legal power to set and enforce regulatory meat hygiene requirements, and have final responsibility for verifying that regulatory meat hygiene requirements are met. It should be the responsibility of the establishment operator to produce meat that is safe, suitable and in accordance with regulatory meat hygiene requirements. There should be a legal obligation on relevant parties to provide any information and assistance as may be required by the competent authority.

*Although all interested parties have a role in meat hygiene, the competent authority is responsible for setting standards and has the final responsibility for ensuring that safety and suitability requirements as specified in regulations are met.*

**UNITED STATES**

The 2<sup>nd</sup> sentence should be amended to invert the words “...suitable, and...”

New wording: “It should be the responsibility of the establishment operator to produce meat that is safe and suitable in accordance with regulatory meat hygiene requirements.”

Rationale: A competent authority cannot require an establishment operator to produce meat that is safe and suitable outside regulatory meat hygiene requirements.

**EUROPEAN COMMUNITY**

To bring the narrative in line with the wording of the principle, it should be amended as follows:

Although all interested parties have a role in meat hygiene, the competent authority is responsible for setting standards and has the final responsibility for *verifying* that safety and suitability requirements as specified in regulations are met.

**Principle 3**

3. Meat hygiene programmes should have as their primary goal the protection of public health and should be based on a scientific evaluation of meat-borne risks to human health and take into account all relevant food safety hazards, as identified by research, monitoring and other relevant activities.

*For food in international trade, the WTO SPS Agreement requires that sanitary measures be based on scientific principles and an assessment of the risks to human health, using risk assessment techniques developed by the relevant international organisations. It is now generally accepted at both the international level i.e. Codex, and the national level i.e. Member government competent authorities, that food hygiene standards should be based on science and risk assessment to the extent possible and practicable.*

**CANADA**

Canada notes some potential confusion between the use of the phrase “evaluation of meat-borne risks” and “risk evaluation” as used later in the text, and recommends changing the text to more clearly reflect the intent as outlined in the explanatory text. Hence, the principle should read:

*Meat hygiene programs should have as their primary goal the protection of public health and should be based on **scientific principles and an assessment** of meat-borne risks to human health and take into account all relevant food safety hazards, as identified by research, monitoring and other relevant activities.*

**SWITZERLAND**

Replace “evaluation of meat-borne risks” with “assessment of meat-borne risks”.

**EUROPEAN COMMUNITY**

The WTO SPS agreement does not speak about ‘scientific principles’ but about ‘scientific justification’ (Article 3.3). Furthermore, it states that sanitary or phytosanitary measures shall be based ‘on an assessment, as appropriate to the circumstances, of the risks to human, animal or plant life or health...’.

Taking into account this wording, it is proposed to amend the first sentence of the narrative of Principle 3 as follows:

For food in international trade, the WTO SPS agreement requires that sanitary *measures have a scientific justification and be based on scientific principles and* ~~be based on scientific principles and~~, *as appropriate to the circumstances*, on an assessment of the risks to human *or animal life* or health, using risk assessment techniques developed by the relevant international organisations.

**IACFO**

Principle 3 should be clarified to acknowledge that scientific risk assessment of food-borne hazards should not be used to delay management of known risks. We recommend that the following new sentence be added at the end of Principle 3:

*“3. Consistent with the goal of public health protection, the use of risk assessments should not delay public health management of the risk posed by known food-borne hazards.”*

**Principle 4**

4. The principles of food safety risk management should be incorporated wherever possible and appropriate in the design and implementation of meat hygiene programmes.<sup>2</sup>

*The Codex system is working on several fronts to develop practical guidelines for incorporating risk assessment into the design and implementation of food hygiene standards. Development of a framework for management of food-borne risks to human health is based on four steps: risk evaluation (including risk assessment), assessment of options for managing risks, implementation of hygiene measures, and monitoring and review.*

**CANADA**

Canada recommends the addition of text within the explanatory section of this principle to more clearly reflect the intent and definition of risk evaluation currently being considered by CCGP. Risk evaluation does not include risk assessment (in the same way that risk management does not include risk assessment), however, it does require the consideration of the results of risk assessment.

<sup>2</sup> Codex Committee on Food Hygiene, proposed draft Principles and Guidelines for the Conduct of Microbiological Risk Management (CX/FH 01/7 and ALINORM 03/13 paras. 99-128); Codex Committee on General Principles, proposed draft Working Principles for Risk Analysis, CX/GP 02/3

## 4. (Explanatory Text)

*The Codex system is working on several fronts to develop practical guidelines for incorporating risk assessment into the design and implementation of food hygiene standards. Development of a framework for management of food-borne risks to human health is based on four steps: risk evaluation (including **consideration of risk assessment results**), assessment of options for managing risks, implementation of hygiene measures, and monitoring and review.*

**SWITZERLAND**

Replace "risk management" with "risk analysis". Risk management is part of the risk analysis process and therefore the more general term including risk management. In the footnote, reference is made to both risk management and risk analysis.

**Principle 5**

5. [Wherever possible and practical, competent authorities should formulate food safety objectives (FSOs)<sup>3</sup> according to a risk-based approach so as to objectively express the level of hazard control that is required to meet public health goals.]

*FSOs are a relatively new concept in Codex. Given the primacy of HACCP systems in food control, it is apparent that achievement of risk-based food safety goals requires a "bridge" between the level of protection desired for the consumer population ("appropriate level of protection") and the level of hazard control that the HACCP system must necessarily deliver. The concept of a FSO is founded on the need for an objective measure of the level of control of hazards in the food that is required to achieve a desired level of consumer protection.*

**CANADA**

Based on the discussion and agreements reached by the Drafting Group for the Meat Code, the term "Performance Parameters" should be added to this Principle in order to introduce the term into the "Draft General Principles of Meat Hygiene" and to support its use in the Proposed Code of Hygienic Practice for Meat. Hence, the Principle could read:

5. [Wherever possible and practical, **the competent authority** should formulate **performance parameters (including food safety objectives)** according to a risk-based approach so as to objectively express the level of hazard control that is required **to achieve its appropriate level of protection**].

**GERMANY**

Replace in footnote 3 after the first sentence the full stop by a colon and add before the words "Food Safety Objective" a quotation mark.. This is necessary to improve readability.

**SWITZERLAND**

Retain square brackets.

**EUROPEAN COMMUNITY**

The wording of Principle 5 should remain between square brackets until a definition of 'Food Safety Objectives' has been decided upon in the context of Codex Alimentarius.

<sup>3</sup> As a temporary compromise solution, the 34<sup>th</sup> Session of the Codex Committee on Food Hygiene decided that its drafting group should use the following definition proposed by the ICMSF as a basis for its discussions. Food Safety Objective: The maximum frequency and/or concentration of a [microbiological] hazard in a food at the time of consumption that provides the appropriate level of health protection [(ALOP)]." (ALINORM 03/13 Para. 123)

### Principle 6

6. Meat hygiene requirements should control hazards to the greatest extent practicable throughout the entire food chain. Information available from primary production should be taken into account so as to tailor meat hygiene requirements to the spectrum and prevalence of hazards in the animal population from which the meat is sourced.

*Food safety measures can be implemented at many points in the food chain and an optimal meat hygiene system will apply available measures at those points where they are the most efficient and effective in terms of reducing food-borne risks to human health. Because of the particular nature of meat production systems, optimisation of meat hygiene activities at the processing level requires appropriate information to be supplied from the primary production level.*

### Principle 7

7. The establishment operator should apply HACCP principles. To the greatest extent practicable, the HACCP principles should also be applied in the design and implementation of hygiene measures throughout the entire food chain.

*HACCP is now acknowledged as the food hygiene system of choice, and the establishment operator has the primary responsibility for its application. However, there are some concerns over the practicality of HACCP at the farm level and therefore this draft principle must remain flexible in terms of application to all sectors of the food chain.*

### IACFO

Principle 7 should be broadened to recognize that effective HACCP systems must include objective measures to determine whether a plant is producing meat that is clean and safe. Establishing, testing for, and enforcing limits on disease-causing organisms is the vital element that turns HACCP from an industry-driven quality assurance program to one that has a human health rationale and value. A key component of effective HACCP systems is pathogen testing both by the competent authority and the establishment operator.

We urge that Principle 7 be amended to as follows:

*“7. The establishment operator should apply process control (HACCP) principles. To the greatest extent practicable, the process control principles should also be applied in the design and implementation of hygiene measures throughout the entire food chain. Process control systems should include objective measures of whether a plant is successfully controlling the presence of pathogens. Pathogen testing by both the competent authority and the establishment operator is an important mechanism for verifying the effectiveness of process control systems in controlling product contamination.”*

### Principle 8

8. When voluntary quality assurance systems have been put in place, competent authorities should take the contribution of such systems into account during verification of regulatory requirement.

*QA systems are widespread in the food industry. Voluntary inclusion of meat hygiene activities in an overarching QA system operated by the establishment operator is likely to result in enhanced delivery, and 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. The Codex Committee on Import and Export Inspection and Certification Systems is currently considering a discussion paper entitled “Proposed Draft Guidelines for the Utilisation of Quality Assurance Systems to Meet Requirements in Relation to Food” which explores the possible role of the competent authority in officially recognising such QA systems.*

**CANADA**

To maintain consistency within the principles, Canada recommends that the term “competent authorities” in this principle be replaced with “the competent authority”. Hence the principle should read:

8. *When voluntary quality assurance systems have been put in place, **the competent authority** should take the contribution of such systems into account during verification of regulatory requirements.*

**GERMANY**

Add after the words "quality assurance system" the abbreviation "(QA)", because it is used in the following text.

**SWITZERLAND**

Last word "requirements" (missing s).

**EUROPEAN COMMUNITY**

Quality assurance systems can be operated at the level of the establishment operator but can also be operated more broadly at the level of (part of) the food chain, including for example primary producers. The second sentence of the narrative should therefore be amended, either by deleting the words ‘operated by the establishment operator’ or by broadening this to: ‘operated by the establishment operator or at the level of (part of) the food chain’. In the same sentence, the words ‘is likely to’ should be changed to ‘may’. The last sentence of the narrative should be amended to indicate that the CCFICS-paper is, in general, exploring the role of the utilisation and assessment of QA-systems to meet requirements in relation to food. The following wording is proposed for the narrative of Principle 8:

QA systems are widespread in the food industry. Voluntary inclusion of meat hygiene activities in an overarching QA system ~~operated by the establishment operator is likely to~~ *may* result in enhanced delivery, and competent authorities may take properly-functioning QA systems into account when carrying out their regular responsibilities e.g. by decreasing the frequency of HACCP verification checks. The Codex Committee on Import and Export Inspection and Certification Systems is currently considering a discussion paper ~~entitled “Proposed Draft Guidelines for the Utilisation of Quality Assurance Systems to Meet Requirements in Relation to Food”~~ which explores the possible role of the ~~competent authority in officially recognising such QA systems~~ utilisation of QA systems to meet requirements in relation to food.

**IACFO**

Principle 8 should either be redrafted or deleted. Quality assurance programs are not designed to assure product safety, only product consistency and quality, and do not provide the same functions as process control (HACCP) systems. They are not a substitute for and should not replace adequate verification by the competent authority of regulatory requirements and their implementation does not provide a basis for decreasing the frequency of verification checks by the competent authority. Moreover, because quality assurance programs are voluntary, they are not enforceable.

**Principle 9**

9. The range of activities involved in meat hygiene should be carried out by personnel with the appropriate training, knowledge, skills and ability as and where defined by the competent authority.

*Meat hygiene involves a complex range of activities and the personnel carrying out those activities are not always directly employed by the competent authority e.g. a number of countries are trialing ante-mortem and post-mortem inspection systems that partly involve industry personnel. The training and competency of all personnel involved in meat hygiene is a key element in ensuring food safety and suitability, and defining training, knowledge, skills and ability, and roles of appropriately-trained personnel remains the responsibility of the competent authority.*

**EUROPEAN COMMUNITY**

The responsibility of the competent authority should be to define the *minimum* requirements for training, knowledge, skills and ability, leaving industry the possibility to introduce extra requirements. Apart from this, Principle 9 is focussing on the aspect of training, and the narrative should reflect this. It is therefore proposed to amend the narrative of Principle 9 as follows:

The training, knowledge, skills and ability of all personnel involved in meat hygiene are a key element in ensuring food safety and suitability, and defining *the minimum requirements for this* ~~and roles of appropriately trained personnel~~ remains the responsibility of the competent authority.

**Principle 10**

10. The competent authority should define the role of those personnel involved in meat hygiene activities where appropriate, including the specific role of the veterinary inspector.

**GERMANY**

It is proposed to add a narrative with the following wording:

„Ante- and post-mortem inspection are central meat hygiene activities in achieving that meat is safe and suitable for human consumption. These activities should be based on science. Thus the competent authority should define the activities reserved to the veterinary inspector and the activities which may be performed by other personal.“

**EUROPEAN COMMUNITY**

The words ‘involved in meat hygiene activities’ should be replaced by ‘involved in inspection and verification activities’.

It is suggested to invert the Principles 9 and 10, as it seems more appropriate to cover the issue of the role before covering the training-issue.

**Principle 11**

11. The competent authority should verify that the establishment operator has adequate systems in place to trace and withdraw meat from the food chain. Communication with consumers and other interested parties should be considered where appropriate.

*Adequate systems for recall of product are an increasingly recognised requirement of industry.*

**NEW ZEALAND**

In relation to principle 11, second sentence, we suggest that this sentence could be reworded as: "Communication with consumers and other interested parties should be considered and undertaken where appropriate."

**SWITZERLAND**

The last sentence is not specific enough. Suggestion "The communication of risks to consumers and other interested parties should be considered where appropriate."

**EUROPEAN COMMUNITY**

From the wording of the Principle it is not clear who should communicate with the consumer, the competent authority or the establishment operator. As the first sentence of this Principle concerns the competent authority, it could be understood that the second sentence also refers to the competent authority. The establishment operator however has the first responsibility to communicate with consumers. The following wording is suggested for the second sentence:



In the case of withdrawal of meat from the food chain, the establishment operator should effectively and accurately communicate with consumers and/or other interested parties.

### Principle 12

12. As appropriate to the circumstances, the results of monitoring and surveillance of animal and human populations where available should be considered with subsequent review and/or modification of meat hygiene requirements whenever necessary.

*A framework for effectively managing food-borne risks to human health requires monitoring and surveillance of the consumer population to determine if hygiene measures are achieving the required level of consumer protection. Further, monitoring of the animal population for specified hazards may be required to determine the prevalence of infected or contaminated animals entering the food chain.*

#### **GERMANY**

Other than the results of the 8<sup>th</sup> Session of the Codex Committee on Meat and Poultry Hygiene the words "where available" were added after "results of monitoring and surveillance of animal and human populations". These words should be deleted, as they are dispensable. Only if the results mentioned are available, they can be taken into account.

#### **IACFO**

Principle 12 should be revised to reflect the crucial role of the competent authority in monitoring and surveillance of animal and human populations for food safety purposes and in enforcing food safety requirements.

We recommend that Principle 12 be amended as follows:

“12. As appropriate to the circumstances, the results of monitoring and surveillance of animal and human populations where available should be considered with subsequent review, modification and/or *enforcement* of meat hygiene requirements whenever necessary.

### Principle 13

13. Competent authorities should recognise the equivalence of alternative hygiene measures where appropriate, and promulgate meat hygiene measures that achieve required outcomes in terms of safety and suitability and facilitate fair practices in the trading of meat.

*The equivalence of food hygiene measures is an increasingly important issue in the international trade in foods. “Equivalence is the state wherein sanitary measures applied in an exporting country, though different from the measures applied in an importing country, achieve, as demonstrated by the exporting country, the importing country’s appropriate level of protection” (Codex Committee on Import and Export Inspection and Certification Systems; ALINORM 01/30A, Appendix III).*

#### **SWITZERLAND**

Reference should be made to the text on equivalence developed by CCFICS.

#### **EUROPEAN COMMUNITY**

The narrative of Principle 13 only refers to international trade. The Principle itself however seems to have a more broad application, covering meat production in general. This should be reflected in the narrative.