

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Fourteenth Session

Geneva, 29 June - 10 July 1981

REPORT OF THE ELEVENTH SESSION OF THE
CODEX COMMITTEE ON PROCESSED MEAT AND POULTRY PRODUCTS

Copenhagen, 22-26 September 1980

INTRODUCTION

1. The Codex Committee on Processed Meat and Poultry Products held its Eleventh Session in Copenhagen from 22 to 26 September 1980. Mrs. Anne Brincker, Acting Assistant Director, Danish Meat Products Laboratory acted as chairman. The session was attended by representatives and observers from the following 28 countries:

| | | | |
|-----------|-----------|--------------|---------------|
| Argentina | Egypt | Mexico | Spain |
| Australia | Finland | Netherlands | Sweden |
| Belgium | France | New Zealand | Switzerland |
| Botswana | Germany, | Nigeria | United |
| Brazil | Fed. Rep. | Norway | Kingdom |
| Canada | Hungary | Poland | United States |
| Chile | Japan | South Africa | of America |
| Denmark | Kenya | (observer) | Uruguay |

The following international organizations were also represented:

- Association des centres d'abattage de volailles et du commerce d'importation et d'exportation de volailles de la CEE (AVEC)
- Centre de liaison des industries transformatrices de viandes de la Communauté européenne (CLITRAVI)
- European Vegetable Protein Federation (EUVEPRO)
- International Commission on Microbiological Specifications for Foods (ICMSF)
- International Organization of Consumers Unions (IOCU)
- International Organization for Standardization (ISO)
- Nordik Committee on Food Analysis (NMKL)

The list of participants including officers from the Secretariat, is set out as Appendix I to this Report.

2. The Committee and the new chairman were welcomed by Mr. J. Madelung, Head of Division of the Danish Ministry of Agriculture. He recalled the many years of association of the late Dr. V. Engaard (Denmark) with Codex Alimentarius and the Committee on Processed Meat and Poultry Products. He informed the Committee about

the appointment of the new chairman, Mrs. Anne Brincker by the Danish Government. The Committee observed a minute's silence in memory of Dr. Enggaard.

3. The Committee was also welcomed by Mr. J.I. Waddington, Director, Environmental Health, WHO Regional Office for Europe on behalf of its regional director Dr. Leo A. Kaprio, Mr. Waddington outlined the work of the regional office related to environmental health and stressed the importance of the work being carried out by the Codex Committee on Processed Meat and Poultry Products which was particularly important from the viewpoint of food safety.

4. The chairman stressed the need for widespread dissemination of the work being carried out by Codex. She introduced to the Committee the new members of the FAO/WHO Codex Secretariat and the Danish Secretariat,

ADOPTION OF PROVISIONAL AGENDA

5. The Committee adopted the provisional agenda.

ELECTION OF RAPPORTEURS

6. The Committee appointed Mr. I. Adams (UK) and Mr. M. Gambon (France) as Rapporteurs of the Session.

REVIEW OF MATTERS RELEVANT TO THE CODEX COMMITTEE ON PROCESSED MEAT AND POULTRY PRODUCTS

7. The Committee had before it document CX/PMPP 80/2 containing matters of interest to the Committee arising from (i). the 13th Session of the Codex Alimentarius Commission and (ii) Reports of other Codex Committees.

8. The Committee noted that a considerable number of matters of interest reported would be discussed later under other agenda items and agreed to defer discussion of them until the particular agenda items were under consideration.

9. The Committee also noted that at the 13th Session the Commission had reviewed the general direction of its work priorities and had made some shifts in emphasis directed towards meeting the needs of the developing countries. The Commission decided that its subsidiary bodies should, if necessary, examine nutritional aspects when drawing up food standards, especially when they were of importance to developing countries. The Commission had confirmed that the economic impact of any standard being developed could be considered at all stages of development. This action was taken in order to respond to the wishes of the developing countries on the question of the economic impact or implications which the international standards might have for them. The Commission adopted the draft Code of Ethics for the international trade in foods as a recommended international code which should be sent to Governments for consideration. This code, if used universally by traders would reduce abuses in the international trading of foods and thus would fulfill one of the objectives of the Codex Alimentarius.

10. The Committee was informed that at its 13th Session the Commission adopted at Step 8 the amended Annex B entitled "Preservation of Meat Products Heat-treated prior to Packaging" as an Annex to the Recommended International Code of Hygienic Practice for Processed Meat Products and advanced the code on "Sampling and Inspection Procedures for Microbiological Examination of Processed Meat Products" to Step 6 of the Codex procedure.

11. The Committee noted that the Coordinating Committee for Asia had considered the question of developing harmonized labelling provisions for processed meat products in conformity with Islamic religious requirements. The Saudi Arabian authorities agreed to convene a working group in its country of qualified technical and religious experts on this topic. This has not yet been convened pending a review of the subject which was being made in Brazil.

12. The attention of the Committee was drawn to the decision of the Commission that no work on boneless meat should be undertaken by the Codex Committee on Meat or by the Coordinating Committee for Europe.

13. The Committee noted that the Commission at its Thirteenth Session had adopted a standard wording to be used when making provision in Codex Commodity Standards for Additives carried over from Raw Materials (see para. 19, ALINORM 79/12). The Committee also noted that the Committee on Food Additives will consider its approach to endorsement of food additives in Codex Standards in view of the changing attitude towards a more restrictive position with respect to food additives. The Commodity Committees were reminded that the justification for food additives should be carefully examined in all standards.

14. The Committee noted that the Committee on Methods of Sampling and Analysis had not endorsed the methods recommended by ISO for analysis of canned corned beef, luncheon meat and cooked cured ham pending collaborative studies.

15. The Committee was informed by the WHO representative of the WHO current activities which were of interest to their work. A joint FAO/WHO programme was launched on "Meat hygiene and meat handling under rural conditions where modern facilities are lacking". The main components of the development programme were: training, guidelines for the design and construction of slaughter facilities, slaughter and meat handling and meat inspection. A series of other guidelines were under preparation by WHO, which would have a great practical value for developing countries. The essential technical help to developing countries with respect to zoonoses and foodborne diseases would be provided by WHO Zoonoses Centres. At present adequate services for such technical cooperation were available in the Region of the Americas and in the Mediterranean area. In the area of microbiological specifications of food, WHO called attention to the last FAO/WHO Expert Committee Meeting in this field convened in Geneva (1979). The next meeting of the working group will be held in November 1980 in Washington when microbiological criteria for dried milk and natural mineral water will be discussed.

16. The attention of the Committee was drawn to the coordination and implementation of WHO Surveillance Programme for Control of Foodborne Infections and Intoxications in Europe. The last WHO meeting (1980) devoted to this programme was convened in Berlin (West) when the amended version of the paper "Organization and management of the WHO surveillance programme for control of foodborne infections and intoxications" was reviewed. This document enabled the programme to be operational in 1980.

17. With regard to microbiological contaminants of food, the WHO representative gave a summary of work done recently in Geneva by a meeting of experts in the use of hazard analysis and critical control point systems (HACCP). This concept includes an assessment of the health and aspoilage/risks associated with processing and marketing a given food product; determination of critical control points in the manufacturing process, and the establishment of programmes for monitoring at critical control points.

18. The WHO representative also brought to the attention of the Committee the tasks and expected outcome of forthcoming WHO/WAVFH meeting devoted to prevention and control of salmonella infection (Bilthoven, 6-10 October 1980), and the Joint FAO/IAEA/WHO Expert Committee on the Wholesomeness of Irradiated Food (Geneva, 27 October - 3 November 1980).

19. The WHO Regional Officer for Europe for food safety informed the Committee of its food control activities including aspects of implementation and enforcement of food law.

CONSIDERATION OF ACCEPTANCE OF RECOMMENDED CODEX STANDARDS FOR PROCESSED MEAT PRODUCTS

20. The Committee had before it document CX/PMPP 80/3 on Consideration of Acceptances of Recommended Codex Standards for Processed Meat Products.

21. The Committee noted that the Codex Alimentarius Commission at its 13th Session endorsed the views of the 25th Session of the Executive Committee that as a specific practical measure for encouraging more acceptances of the recommended standards there should be a standing item on the agenda of the Codex Committee that would cover a review of acceptances of standards elaborated by each Committee. The Committee was informed of the concern expressed in the Coordinating Committee for Asia at the comparatively slow response of developed countries in accepting the Recommended Codex Standards in general and also of the view of many developing countries that they would like to use these standards for their export trade.

22. The Committee was also informed that it would be a step in the right direction and fulfilling one of the objectives of the Codex Alimentarius i. e. the facilitation of international trade if countries which were not in a position to give formal acceptance to a standard, could agree to permitting entry into and circulation into their territory of products which are in conformity with the Recommended Codex Standards.

23. The Committee was informed that three kinds of acceptances (i) full acceptance, (ii) target acceptance and (iii) acceptance with specified deviation are possible under the Codex rules of procedure.

24. The Committee noted that it had elaborated so far five international standards: (i) canned corned beef, (ii) luncheon meat, (iii) cooked cured ham, (iv) cooked cured pork shoulder and (v) cooked cured chopped meat.

25. The Committee noted the acceptances of certain of the standards so far received and expressed satisfaction especially, in view of the fact that the standards elaborated are recent and that countries would need considerable time to accept international standards because their acceptance required approval of different Government Services.

26. Some countries reported the Committee on progress made so far as regards acceptances of the standards developed by the Committee and also the difficulties that they are facing to accept the standards. USA informed the Committee that it is reviewing all the standards and shall be in a position to report during the next 12 months regarding progress made so far with regard to acceptances.

27. The delegation from Switzerland brought the attention of the Committee to the regulations in its country which allow free circulation of foods conforming to 30 different Codex standards. The delegation suggested that the Codex secretariat in its publication

on "Acceptances" should include information about the present status of regulations in different countries which allow free circulation of foods conforming to Codex standards.

28. The Chairman drew the attention of the different delegations to the fact that it is important for the Committee to receive notifications regarding acceptances at an early date since such information would help the Committee considerably in revising the standards at a later date.

SAMPLING AND INSPECTION PROCEDURES FOR MICROBIOLOGICAL EXAMINATION OF PROCESSED MEAT PRODUCTS

29. The Committee examined the above document (ALINORM 79/16 Appendix m), which had been advanced by the Codex Alimentarius Commission to Step 6 of the Procedure, in the light of comments from governments and ICMSF (International Commission for Microbiological Specifications in Foods) as contained in CX/PMPP 80/4 and Add. 1.

30. The representative of the ICMSF informed the Committee that because the document was eventually intended to become Annex C to the Recommended International Code of Hygienic Practice for Processed Meat Products, ICMSF had considered that the present preface was unnecessarily detailed. It had therefore proposed for consideration by the Committee an abbreviated and up-dated preface and a text which included sections on scope, field of application, necessary references and key definitions of "lot" and "reject".

31. In addition, because the text manifestly applied to the inspection of stable or non stable products in hermetically sealed containers an appropriate amended title was also proposed.

32. The Committee examined the ICMSF proposal and made the following decisions:

Title

33. The ICMSF proposal for the following title was agreed "Sampling and Inspection Procedures for Microbiological Examinations of Meat Products in Hermetically Sealed Containers".

34. It was also agreed to refer to the document as Annex C to CAC/RCP 13-1976.

Scope and Field of Application

35. It was pointed out that the present provisions would be applied to all imported canned products but that data should be available only when required by the controlling authority for the examinations of suspect lots and not on a routine basis.

36. It was agreed to delete the following: "or where data on the production and shipment of the lot are inadequate or lacking".

37. The Committee also agreed that the scope and field of application provisions could be usefully combined as follows:

38. "These sampling and inspection procedures are to be used in international trade for investigational purpose for lots of meat products in hermetically sealed containers. The procedures apply where the controlling authority has reason to suspect a lot containing defectives. The procedure under A applies to shelf stable products and those under B to non shelf stable products."

References

39. The Codex Committee on Food Hygiene had not yet decided on the title nor had it examined the first draft of the proposed draft Code of Practice for Refrigerated Low-Acid Foods. It was therefore decided to delete the present reference to this code.

Definitions

40. "Lot". The Committee noted that the proposed definition was largely that of the ICMSF except that the statistical definition had been deleted. It was agreed to delete "supposedly" from the definition since the conditions under which a lot was produced was adequately defined.

41. "Reject". It was noted that the footnote present in the original text had been modified as a result of discussions which had taken place at the Joint FAO/WHO Working Group on Microbiological Criteria for Foods (WG/Microbiol/79/1). The Committee agreed to the interpretation given in the General Principles for the Establishment and Application of Microbiological Criteria for Foods (see ALINORM 79/13A, paras 30-40).

42. "Random". The Committee agreed that a definition of "random" should be added and agreed to the following "Random describes a manner of sampling which excludes bias. When applied to a sampling procedure it implies that the procedure will cause each sample unit to have an equal chance of being selected."

Section A. Shelf-stable meat products, heat treated after packaging

43. The Committee discussed the above section of ALINORM 79/16 Appendix HI. The following is a summary of the discussions and decisions.

(a) Sampling methods

44. The Committee was informed that there were valid statistical sampling techniques the results of which could be extrapolated to an entire lot with an agreed confidence level which would avoid the possibility of destructive sampling of valuable lots.

45. It noted however that the present proposal to select 200 containers when taken in combination with the defects (Rejection Nos) defined as in paragraph 'b' was thought to give the best cost benefit balance. Statistical sampling was made on the basis of operating characteristic curves which were only significantly influenced when the proportion of samples was large in relation to the size of the lot.

46. It was pointed out that the sampling and inspection procedures first required visual inspection of the samples and then incubation for microbiological contamination before a decision on destructive testing could be reached and that in international trade small lots for these types of products were very rare.

47. The Committee decided to maintain the present text.

(b) Examination for defects

48. The Committee agreed to some deletions and amendments to make the text clearer and more concise. With regard to "swells" the Committee noted that the delegation of Argentina was of the opinion that a definition was required as swells may be caused by factors other than microbiological growth. After some discussion it was agreed that the present procedure dealt with microbiological inspection only and that

swells other than microbiological (such as overfilling) were not appropriate for consideration here.

49. A general definition was therefore not appropriate to the present text and the proposal was not pursued.

(c) Sorting

50. It was agreed to clarify the sentence referring to the causes of defective containers by emphasizing the procedure to be followed when underprocessing is suspected.

(f) Incubation

51. It was noted that there was no provisions for the detection of thermophils in uncured meat products. Comments on whether extra provision was required had been requested at the last session of the Committee (see ALINORM 79/16, para. 18) but little response had been received.

52. The Committee was informed that for certain products destined for some countries, processing was modified to take account of high ambient temperatures. It was decided not to include provisions for thermophilic testing.

53. It was agreed however that the present provisions were not sufficiently precise. The following amended text was adopted "In the laboratory incubate the 200 containers at 35°C for 10 days or at 37°C for 7 days".

(g) Swells

54. It was agreed to amend the text to provide for rejection of swells after examination at ambient temperature.

(h) Tear down test

55. The Committee noted a proposal by the delegation of Australia to elaborate criteria for the tear down test. It was decided however that this was a general problem and that a more appropriate place for such criteria would be the Code of Hygienic Practice for Low-Acid and Acidified Low-Acid Canned Foods. It was agreed to refer the matter to the Codex Committee on Food Hygiene for consideration.

Section B. Non shelf-stable meat products, heat treated after packaging

Sampling procedures

56. It was decided to re-arrange the order of (a) and (b) to better reflect the sequence of events during examination.

Temperature requirement

57. There was some discussion on whether, in accordance with various regulations, a temperature lower than 10°C should be specified. The following wording was agreed: (a) "If the temperature does not exceed 10°C or any other lower temperature specified by the shipper" accept the lot.

Sample sizes

58. Some delegations were of the opinion that because the above products were at least as prone to microbiological hazards as those under Section A, the sample sizes should be similar, especially for visual examination. Other delegations pointed out the practical and economic difficulties of large scale sampling of this class of products which

could in some cases involve the removal of tons of products from cold storage. The delegation of Argentina expressed concern that an equivalent test procedure to that for the stable products should be developed. He also pointed out that economic considerations were not of prime importance in matters concerning public health.

59. The Committee noted that microbiological contamination in these products was easier to detect and in view of the practical and economic aspects, decided to maintain the present sample size in combination with the rejection nos specified in (c).

Laboratory treatment of samples

60. The representative of ISO informed the Committee that a method for the laboratory treatment of samples (ISO draft proposal 6563) would soon be circulated as an international standard. The Committee agreed to include the reference to the international standard in the final version of Annex C.

Status of Annex C

61. The Committee agreed to advance Annex C to Step 8 of the Procedure and to submit it to the Codex Committee on Food Hygiene for examination.

PROPOSED DRAFT CODE OF PRACTICE FOR THE PRODUCTION, STORAGE AND COMPOSITION OF MECHANICALLY SEPARATED MEAT AND POULTRY

62. The Committee had before it two documents CX/PMPP 80/5 and CX/PMPP 80/5 Add. 1, which contained government comments on the draft code of practice at Step 3 (see ALINORM 79/16, Appendix IV). The report of the third meeting of the FAO/WHO working group on microbiological criteria for foods (WG/Microbiol/79/1) was also available.

63. The Committee noted that the FAO/WHO working group on microbiological criteria for foods thought that elaboration of microbiological criteria for mechanically separated meat and poultry was not justified and agreed with this recommendation. The Committee then discussed the code paragraph by paragraph.

Title

64. The Committee noting that the mechanically separated meat was mainly intended for further processing and that very little if any goes for direct consumption agreed that the title of the code should be changed accordingly.

65. The amended title of code would read as "Proposed Draft Code of Practice for the Production, Storage and Composition of Mechanically Separated Meat and Poultry Intended for Further Processing".

Paragraph 1

66. The Committee noted that this paragraph concerned the type of equipment that should be used for mechanical separation of meat. Some delegations thought that the reference to the equipment should be retained in the paragraph since that would provide guidance to manufacturers in the selection of equipment to be used. Other delegations thought that approval of specific machinery for the purpose was undesirable and might pose problems in international trade in that importing countries could reject a consignment manufactured by machinery other than that approved and drew the attention of the Committee that references to equipment were not made in other codes of practice (e.g. CAC/RCP 11-13/1976).

67. The Committee agreed not to make a reference to the equipment to be used and deleted the first sentence.

Paragraphs 2 and 3

68. The Committee agreed to deal with paras 2 and 3 together since they dealt with the same question.

69. The Committee's attention was brought to the EEC draft regulations of mechanically separated meat. It was suggested that the proposed Codex Code of Practice should be brought into harmony with the EEC draft regulations. The Committee, however, noted that the EEC draft regulations are at a very preliminary stage and hence did not agree to the suggestion.

70. The delegation of the United Kingdom informed the Committee that this draft code only prohibited the use of bones from the skull and felt that it should also exclude limbs severed at the tarsus or carpus in addition to head bones. The delegation thought that at least the hoofs and feet should be excluded.

71. The Committee noted the definition of carcass as given in the Recommended International Code of Hygienic Practice for Fresh Meat (CAC/RCP 11-1976) and agreed to retain the text as covering the points made and excluding skulls. The version suggested by Denmark for the combined paragraphs 2 and 3 was accepted.

Paragraph 4

72. The Committee agreed that there was no reason for a distinction between time/temperature combinations for keeping bones, carcasses or parts of carcasses of mammals and poultry, and that those included in the provisions should reflect normal good manufacturing practice, need not be very specific and should serve as examples of suitable time/temperature combinations.

73. The Committee noted that the temperature for adequate preservation could vary significantly, especially if salt or chemicals were added.

74. The Committee agreed to the circulated text of a proposal made by Denmark in Document CX/PMPP 80/5 with the amendment suggested by the delegation of Norway and to add an additional clause which would cover freezing (see Appendix III).

Paragraph 6

75. The Committee did not think that a special provision for freezing was necessary in this paragraph as suggested by the delegation of New Zealand and agreed not to make any changes to the original text.

Paragraphs 8 and 9

76. The Committee noted that paras 8 and 9 should be combined to cover both storage and transport conditions. The Committee noted that the text suggested by the delegation of Denmark contained revisions which were only editorial in nature and agreed to adopt the revised text including the suggestion of the Netherlands to substitute 48 hours for the 24 hours provision.

Paragraph 10

77. There was considerable discussion on the provision for maximal levels of calcium in the code. The attention of the Committee was drawn to the decisions taken at its last session that compositional requirements should be included in the code since calcium content as bone could contribute to economic fraud. The Committee was informed that

the present provision of a maximal level of 2.5% calcium on dry weight basis may amount to the presence of 6-10% of bone particles in separated meat on fresh weight basis.

78. Several delegations thought that the content of 2.5% calcium provided in the code was too high and that current separation techniques could allow limits of 0.1 to 0.2% to be established thus ensuring greatly reduced bone content in the separated meat,

79. Other delegations thought that the figure of 2.5% for calcium content on dry weight basis should be retained in the code since such amounts were usually found in separated meat prepared by equipment presently used. If maximal permissible levels of calcium are reduced to 0.1-0.2%, it would preclude the use of certain equipment which was found satisfactory. The Committee was informed of the CLITRAVI acceptance of levels of 2.5% calcium on dry basis in separated meat.

80. The Committee could not agree to any revision of the levels of calcium suggested in the code, since they felt that such a revision would need substantive and detailed technical information, not at present available to the Committee. It decided to leave the figures for the calcium content in square brackets and to seek more comments from governments. It was decided not to discuss bone particle size since this should be covered by Good Manufacturing Practice.

81. The Committee noted that largely because of variable fat content of the final product there was a corresponding variation in the calcium content calculated on dry matter. It was noted that the development of methods for expressing calcium based on the protein content were in progress. The Committee decided to make no changes to the present text.

Status of the Code

82. The Committee agreed to advance the proposed draft Code of Practice for the Production, Storage and Composition of Mechanically Separated Meat and Poultry intended for further processing to Step 5 of the Codex procedure. The revised document is attached as Appendix m to this report.

PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR DRY AND SEMI-DRY SAUSAGES

83. The Committee had before it two proposed draft codes of hygienic practice for the above products, CX/PMPP 80/6 A and CX/PMPP 80/6 B, prepared respectively by the United States of America and Italy. A document, CX/PMPP 80/7, was also available which provided the Committee with data on the Volume of Production and Trade of Dry and Semi-dry Sausages.

84. The Committee noted that, following its recommendation to the Commission it had been agreed that work on a Code of Hygienic Practice for such products could be undertaken when the necessary data on international trade had been collected. It was also noted that the Joint FAO/WHO Working Group on Microbiological Criteria for Foods (see WG/Microbiol/79/1 Section 4.2.1) had welcomed the proposed elaboration of a Code of Practice but thought the code should be applied extensively before the establishment of microbiological criteria was considered.

85. The Codex Committee on Food Hygiene had endorsed this point of view.

86. The delegation of the Netherlands, while acknowledging that the criteria for international trade in dry and semi-dry sausages in general had been satisfied, was of

the opinion that the great majority of the extensive variety of sausages marketed presented no public health hazard. Only a restricted amount of the product resulting from a particular type of process (see ALINORM 79/16, para. 29) gave concern.

87. The Committee noted that in one of the two countries where outbreaks of food poisoning traceable to domestic production by the process had occurred, such products were already covered by a national guideline for Good Manufacturing Practice. It was further noted that many delegations of developing countries at the present session reported there was little consumption or production of these types of product in their countries.

88. In view of the restricted international trade in the type of product concerned and the lack of positive evidence from delegates that the wide range of products which the code would cover were of public health concern, the Committee decided to ascertain whether other developing countries not present at the session needed such a code and in the meantime to inform the Commission that work on the code was suspended.

LABELLING INCLUDING QUALIFYING DESCRIPTIONS OF PRODUCTS SIMILAR TO THOSE COVERED BY THE STANDARDS FOR PROCESSED MEAT PRODUCTS

89. The Committee had before it a working paper CX/PMPP 80/8 which had been prepared by the Danish Secretariat.

90. The Committee was informed that certain products existed which did not comply with all of the requirements of Codex standards, but which nevertheless were traded under names which were similar to those laid down by the standard. The scope of the standards was worded to contain a provision, which would continue to permit such products to be traded under the name laid down in the standard provided that it was properly qualified.

91. The Committee's attention was drawn to discussions at the 6th Session of the Codex Committee on General Principles where it was pointed out that the correct use of names and descriptions could only be tackled case by case and that the expression "name and description laid down in the standard" in the rules of acceptances meant the sum of all the relevant provisions in the name of the food part of the labelling section of the standard in question.

92. The Committee noted that the document CX/PMPP 80/8 contained the working documents prepared by the delegations of Denmark and Netherlands for the 10th Session of CX/PMPP on the subject and discussed the three proposals outlined in the Netherlands' submission.

93. The Committee thought that the second option which takes account only of foods that are in international trade and which reads "The Committee might decide not to deal with all the numerous possibilities of similar products but concentrate on those products which are of importance in international trade and to lay down labelling requirements for such similar products" appeared balanced.

94. The Committee noted that cooked cured ham and cooked cured pork shoulders which did not comply with the Codex standard requirements concerning protein on a fat-free basis fell into the category referred to in the above paragraph and discussed the labelling guidelines that need to be elaborated to cover the above products. Changing the name of the product in its entirety or providing qualifying statements to be added to the names were considered.

95. The Committee noted that a qualifying description such as - with less protein - reduced protein content - with extra brine - water added or increased water content appeared appropriate. The majority of the delegations who took part in the discussions showed preference for the expression "water added" as a qualifying statement to cooked cured ham and cooked pork shoulder and most felt that such expressions should be combined with a quantitative declaration of a compositional nature. The US delegation informed the Committee that to include a qualifying description "water added" was the practice in its country. The delegations of the Federal Republic of Germany and Sweden expressed their reservations to the above conclusion as not adequately informing the consumer on the true nature of the product with possible misleading consequences.

96. The Committee agreed to seek more comments from governments for discussion at the next session.

USE OF VEGETABLE PROTEINS IN PROCESSED MEAT AND POULTRY PRODUCTS

97. The Committee was reminded of the discussions that took place at the last session on the subject, when it was decided that a discussion document on the use of vegetable proteins in processed meat and poultry products should be prepared by the Danish Secretariat in cooperation with the delegations of Denmark, United Kingdom and USA for discussion at the present session.

98. The Committee was also informed that the Commission at its 12th Session had established a committee on vegetable proteins with the following terms of reference (see ALINORM 78/41, paras 491-492) "To elaborate definitions and worldwide standards for vegetable protein products (VPP) derived from oil seeds, cereals and other vegetable sources for use in human consumption and to elaborate guidelines on utilization of such VPP in the food supply system on nutritional requirements, safety labelling and any other aspects that may seem appropriate".

99. It was noted that specific provisions concerning vegetable proteins in foods will be dealt with in detail by the respective commodity committees. The use of vegetable proteins in processed meat and poultry products was the responsibility of CX/PMPP.

100. The Committee had before it a working document CX/PMPP 80/9 prepared by the Danish Secretariat and comments on the document from Denmark and USA contained in CX/PMPP 80/9-Add. 1 and 2. Two working papers CX/VP 80/6 and 80/7 prepared by consultants for the first session of the Codex Committee on Vegetable proteins were also available.

101. The Committee agreed that future work on the subject should be carried out in close collaboration with the newly established Codex Committee on Vegetable Proteins. It also agreed not to discuss general nutritional aspects at this session and to restrict discussions to the use of "Vegetable proteins in meat and poultry products" and not to extend it at present to other non-meat proteins.

102. The Committee agreed to consider three possible ways in which vegetable proteins could be used in meat products: vegetable proteins used (i) for functional purposes, (ii) as an optional ingredient or (iii) as replacement for meat.

103. The Committee accepted the following definitions for vegetable proteins used for functional purposes or as a replacement:

1. Vegetable proteins used for functional purposes means that they are used in small amounts for the purpose of a technological function.

2. Vegetable proteins used as replacement means that they are used for the purpose of substituting meat so that the product contains less meat than required or than is customarily expected.

104. The Committee did not elaborate a definition on vegetable proteins used as optional ingredient but agreed that the Danish Secretariat should take note of this and suggest a definition in the guidelines which they would be elaborating.

Vegetable Proteins used for functional purposes

105. The Committee discussed the three following questions:

- (i) To which processed meat products should the addition of vegetable proteins be permitted for functional purposes.
- (ii) Which level should be stipulated for the addition of vegetable proteins for functional purposes.
- (iii) What labelling requirements should be laid down for the addition of vegetable proteins for functional purposes.

106. The Committee agreed that the use of vegetable proteins should be considered for functional purposes in all meat products in the first instance, but the use in meat products consisting of whole pieces of meat should be considered separately in the guidelines.

107. The delegation of Belgium informed the Committee that in its country the use of vegetable proteins for technological reasons was being considered at levels of 1.5-2% in cooked cured ham and cooked cured pork shoulder which were not considered as first quality, and the changes of legislation in their country were under discussion.

108. The Committee observed that it was difficult to arrive at a definite figure which it could recommend for the level of vegetable protein to be used in meat products for functional purposes. The Committee agreed to put a level of 2-3% (on dry basis) in square brackets in the guidelines and to ask for government comments.

109. The Committee felt that the use of vegetable proteins for functional purposes did not require any specific provisions in the name of the product. Since vegetable proteins added for this purpose were not considered as a characterizing ingredient it was appropriate to indicate them in the list of ingredients by specific name and in order of weight on a dry basis.

Vegetable protein used as an optional ingredient

110. The Committee noted that another purpose which partly overlapped the functional purpose existed namely that of vegetable proteins used as an optional ingredient. The use of vegetable proteins in luncheon meat and cooked cured chopped meat was allowed in the same way as other optional ingredients without any specific limitations except those established by the required minimum ingoing meat content.

111. The Committee noted that the use of vegetable protein as an optional ingredient would not decrease the required meat content and consequently found little justification for changing the name of the product the labelling and ingredient list requirements being similar to the requirements for functional protein.

Vegetable proteins used as replacement

112. There was divided opinion regarding the use of vegetable protein as replacement in different meat products. Some delegations felt that the use of vegetable protein as

replacement should not be recommended for meat products containing whole pieces of meat but should be restricted to products like chopped meat and comminuted meat. Other delegations, however, felt that the use of vegetable protein as replacement should be allowed in all types of products provided the products were properly labelled.

113. The Committee agreed that the use of vegetable proteins as replacement should be permitted in all types of meat products. It thought that if any country did have more specific requirements they were free to restrict the replacement of such products.

114. There was divided opinion among delegations regarding the levels of vegetable proteins that should be allowed as replacement in meat products while still retaining the traditional name. The Committee was informed by the delegations of Belgium and Netherlands that in their countries national legislation limited the replacement of meat by vegetable protein or non-meat protein in certain meat products to 20% on a protein basis. In France the limit was 30%. The US suggested the possibility of 50% maximum of replacement.

115. There appeared to be a majority for a level of 30% as a figure in square brackets for consideration and government comments.

116. The delegation of Belgium informed the Committee that strict regulations on the % content of vegetable protein would cause difficulties for the producer who might like to vary slightly the composition of the product because of economic or other reasons especially if it is accepted that the percentage should be declared on the label.

117. The Committee thought that the guidelines on labelling should suggest consideration of (i) traditional name appropriately qualified for example "cured ham with/containing vegetable protein" and (ii) the notion of vegetable protein should be "built-into" the usual name of the product, for example "beef and vegetable protein sausage" and a decision taken after seeking government comments.

118. The Committee agreed that there was no need to put the source of protein in the name since such information was provided in the list of ingredients.

119. The Committee however noted that quantitative declaration of vegetable protein in the product would necessitate inclusion of methods of analysis.

120. The Committee noted that three different methods could be used for indicating the level of replacement by vegetable protein in meat products and showed a preference for the ration of vegetable protein/meat protein x 100. However, no decision was taken and it was agreed to include all the methods in the guidelines and to seek government comments.

121. The observer from ISO informed the Committee that the ISO Committee on Processed Meat Products was elaborating a method for detection and determination of non-meat protein, especially soya.

Other types of products

122. The Committee did not take a decision as regards points raised in Sections 9.2, 10, 10.1 in document CX/VP 80/7 and left it open to elaborate guidelines for these special types of products if need arises.

Recommendation

123. The Committee instructed the Danish Secretariat to prepare draft guidelines for the use of vegetable protein in meat and poultry in the light of the above discussions and those which would take place at the first session of the Codex Committee on Vegetable Proteins and send the proposed draft guidelines to governments for comments at Step 3 of the Codex Procedure. They should draw the attention of the Vegetable Protein Committee to this Report.

CONSIDERATION OF DRAFT GUIDELINES FOR THE LABELLING OF NON-RETAIL CONTAINERS OF FOOD

124. The Committee had before it the draft guidelines for the labelling of non-retail containers as elaborated by the Codex Committee on Food Labelling (ALINORM 79/22, Appendix V) and a working paper CX/PMPP 80/10 prepared by the Danish Secretariat.

125. The Committee was informed of the decision of the Commission at its 13th Session that the draft guidelines for the labelling of non-retail containers of food elaborated by the Food Labelling Committee should be considered by all Codex Commodity Committees in order to check whether the guidelines are applicable to the particular commodities which the Committee is dealing with.

126. The Committee noted that the non-retail containers suggested in the guidelines fall under four categories.

- Category 1: An immediate container in which food or food material is transported or stored principally for catering use or repacking into consumer size packs.
- Category 2: An immediate container in which food or food material is transported principally for further industrial processing.
- Category 3: An outer container for a quantity of prepackaged food, and
- Category 4: A freight container being of permanent construction, designed for re-use and intended for handling and transport of large consignments without intermediate reloading.

127. With regard to containers falling in Category 1 the Committee felt that these types of containers should when containing meat and poultry products be labelled with all the information required in the guidelines with the addition of lot identification, which it considered important.

128. The Committee felt that for containers falling in Category 2 lot identification is not applicable and agreed with the proposed labelling requirements outlined by the Food Labelling Committee.

129. With regard to labelling requirements of containers falling in Category 3, the Committee noted that most of the information for these products could be achieved by reading the label on the prepackages and therefore the information on the outer container would need not be complete. With regard to containers falling in Category 4, the Committee felt that provision should be made for handling and storage instructions if considered necessary but that other requirements would not be practical.

130. The Committee noted that the guidelines outlined by the Labelling Committee did not directly appear to cover all non-retail containers for example Intermediate Containers and that health marking requirements may be desirable in some instances.

FUTURE WORK

131. The Committee noted that its next session would be dealing with the following matters:

- (i) Code of Practice for the Production, Storage and Composition of Mechanically Separated Meat and Poultry Intended for Further Processing at Step 7.
- (ii) Labelling, including Qualifying Descriptions of Products Similar to those Covered by the Standards Elaborated by the Committee.
- (iii) Proposed Guidelines for the Use of Vegetable Protein in Processed Meat and Poultry Products at Step 3.

Revision of the Recommended Code of Hygienic Practice for Processed Meat Products (CAC/RCP 12-1976)

132. The representative of the ICMSF pointed out that although the above code was issued in 1976 most of the provisions were derived from the work done in the mid 1960's. A major revision both with regard to technical content and layout was proposed. The present text for instance gave equal weight to all the provisions: no indication was given of those which were considered of prime importance. In addition, it was proposed to use a system which had been used in the Codes of Practice developed by the Codex Committee on Fish and Fishery Products and had been acknowledged to be of great value especially by developing countries, that is to emphasize the recommended practices by placing them in capital letters and expanding them by explanatory texts in lower case. At the same time the code could also be revised to include the hazard analysis critical control points as a concept (HACCP) (see para. 17).

133. The Committee noted also that its terms of reference had changed since the Recommended Code was published and thought that this was a further reason for undertaking the proposed revision. It was agreed that the initial work could best be carried out by a small working group.

134. The representative of WHO agreed to enquire whether such a group could meet at WHO Headquarters in Geneva, possibly in Spring 1981, it being understood that the expenses and travel of participants would be borne by their governments and sponsoring agencies. A list of possible participants would be established in consultation with the Chairman of the Committee. The Committee agreed to this course of action.

Spices

135. The delegation of Denmark drew the Committee's attention to the fact that the use of ethylene oxide for sterilizing spices that were of value to meat industry is under heavy criticism because of the toxicological effects of ethylene oxide and ethylene chlorohydrine residues. The delegation therefore suggested that a comparative evaluation of the toxicological, bacteriological and technological aspects of the alternative methods of using spices should be carried out in order to ensure that the future need of spices can be met in an acceptable way.

136. The Committee noted that JECFI (Joint Expert Consultation of Food Irradiation) would discuss the question of the irradiation of spices at its next meeting and that both this and the question of the use of ethylene oxide for sterilizing spices used in meat products would be brought to the attention of the Codex Committees on Food Additives and Pesticide Residue.

137. It was also recognized that there was little data on the treatment and preparation of spices and spice derivative and it was decided to ask governments for information on those aspects so that a background document could be prepared for future consideration by the Committee.

Food Additives sections of standards

138. The Committee considered whether the food additives in existing standards should be reviewed. It was pointed out that the Codex Committee on Food Additives was at present examining the question of the technological justification for food additives and there was therefore no point in carrying out such a review at the present time. The Committee noted that at some future date other provision such as date marking should also be reviewed.

OTHER BUSINESS

139. The Committee was informed that the UNECE Secretariat had reported to the Joint ECE/Codex Alimentarius Group, of Experts on the Standardization of Quick Frozen Foods at its 13th Session that a UNECE Group of Experts on the Standardization of Poultry Meat was considering the standardization of poultry meat including deep (quick) frozen and frozen poultry and some concern was expressed that these standards, which covered grading and trade description would not adequately cover consumer protection e.g. food hygiene and food additives.

140. The Committee noted that these were fresh products and should therefore be considered within the Codex system by the Codex Committee on Meat. If food additives and other ingredients were used the products could be defined as "processed" and thus be considered by this Committee. Since information on this point was lacking the Committee decided not to pursue the matter. With regard to labelling provisions for fresh (quick) frozen poultry products it was pointed out that the UNECE should attach to its standards suitable labelling provisions elaborated by the Codex Committee on Food Labelling and the Code of Hygiene Practice for Poultry.

Date and place of next meeting

141. The next session of the Committee would take place before the 15th Session of the Codex Alimentarius Commission at a date to be agreed between the Danish Government and the Codex Secretariat.

142. The Committee noted that as a result of discussions at the 13th Session of the Commission the host governments of Codex Committees had been asked to enquire into the possibility of holding future sessions in developing countries. No delegations present at the session were able to suggest an alternative meeting place for the next session.

1. SUMMARY STATUS OP WORK

| <u>Standard/Code/Document</u> | <u>Status (Step)</u> | <u>To be dealt with by</u> | <u>ALINORM /Appendix/Document</u> |
|--|----------------------|----------------------------|-----------------------------------|
| Standard for Canned Corned Beef | 9 | Governments | CAC/RS 88-1976 |
| Standard for Luncheon Meat | 9 | “ | CAC/RS 89-1976 |
| Standard for Cooked Cured Ham | 9 | “ | CAC/RS 96-1978 |
| Standard for Cooked Cured Pork Shoulder | 9 | “ | CAC/RS 97-1978 |
| Standard for Cooked Cured Chopped Meat | 9 | “ | CAC/RS 98-1978 |
| Code of Hygienic Practice for Processed Meat Products | 9 revision | 12th CCPMPP | 81/16 (paras 132-134) |
| Meat Products Heat Treated Prior to Packaging (Annex B to Recommended International Code of Hygienic Practice for Processed Meat Products) | 9 | “ | To be distributed in due course |
| Sampling and Inspection Procedure for Microbiological Examination (Section I, paras 1 and 2) | 8 advanced | 17th CCFH and 14th CAC | 81/16, App. II |
| Code of Practice for the Production of Mechanically Separated Meat | 5 advanced | 14th CAC and 12th CCPMPP | 81/16, App. III |
| Code of Hygienic Practice for Dry and Semi-Dry Sausages | | Further action suspended | 81/16, paras 83-88 |
| Guidelines for the Use of Vegetable Proteins in Processed Meat and Poultry Products | | 12th CCPMPP | 81/16, paras 97-123 |
| Labelling including qualifying descriptions of products similar to those covered by the standards elaborated by the Committee | | 12th CCPMPP | 81/16, paras 89-96 |
| Position paper on the evaluation of alternative treatment of spices to be used in meat products | | 12th CCPMPP | 81/16, paras 135-137 |

2. Work undertaken by various countries/organizations

- 2.1 Guidelines for the use of vegetable proteins in processed meat and poultry products Danish Secretariat (see para. 123 of the Report).
- 2.2 Position paper on the evaluation of alternative treatments of spices to be used in meat products - Danish Secretariat (see para. 37 of the Report).

3. Request for special comments.

Governments are requested to comment specifically on the matters referred to in paras 77-81 (Appendix III, para. 7), 83-88, 89-96 and 137 of the Report.

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ALINORM 81/16

APPENDIX II

SAMPLING AND INSPECTION PROCEDURES FOR MICROBIOLOGICAL
EXAMINATION OF MEAT PRODUCTS IN HERMETICALLY SEALED CONTAINERS

(Advanced to Step 8 of the Procedure)

(Annex C of Code of Practice for Processed Meat Products (Ref. No. CAC/RCP 13-1976))

SECTION I - Scope

1. These sampling and inspection procedures are to be used in international trade for investigational purposes for lots of meat products in hermetically sealed containers.
2. The procedures apply, where the controlling authority has reason to suspect the lot contains defectives. The procedures under A apply to shelf-stable products, and those under B to non-shelf-stable products.

SECTION II - References

1. Recommended International Code of Hygienic Practice for Low-Acid and Acidified Low-Acid Canned Foods. (ALINORM 79/13A, Appendix IV).
2. Annex A of Recommended International Code of Hygienic Practice for Processed Meat Products: Preservation of Meat Products in Hermetically Sealed Rigid Metal Containers (CAC/RCP 13-1976).

SECTION III - Definitions

1. "Lot" is a quantity of food produced under identical conditions, all containers of which would normally bear a lot number that identifies the Production during a particular time interval, and usually from a particular line, retort or other critical processing unit.
2. "Reject" shall be interpreted in the sense described in General Principles for the Establishment and Application of Microbiological Criteria for Foods (Codex Alimentarius Food Hygiene Committee)*.

* When a product is rejected there are in principle several options as to the action to be taken, depending on the findings and the circumstances. Such options include sorting, reprocessing (e. g. by heating), and destruction, and may need to be specified in the criterion. In deciding on the option the major consideration should be to keep to a minimum risk that unacceptable food reaches the consumer. However, food must not be needlessly destroyed nor declared unfit for human consumption.

3. "Random" describes a manner of sampling which excludes bias. When applied to a sampling procedure, it implies that the procedure will cause each sample unit to have an equal chance of being selected.

SECTION IV - Procedure

- A. 200 containers of shelf-stable meat products are inspected visually. Depending on the number of defective containers, the lot is passed, rejected or subjected to an incubation test.
- B. The temperature is measured between the containers and 10 containers of non-shelf-stable meat products are inspected visually. Depending on the number of defectives and the temperature the lot is passed, rejected or an additional number of containers subjected to a microbiological analysis.

A. Shelf-stable meat products, heat-treated after packaging

(a) Select 200 containers from cartons distributed at random in the lot. The 200 containers are randomly selected from the cartons in accordance with the following schedule:

| <u>No. of containers per carton</u> | <u>No. of containers taken from each carton</u> |
|-------------------------------------|---|
| 5 or less | all |
| 6 - 12 | 6 |
| 13 - 60 | 12 |
| 61 - 250 | 16 |
| 251 or more | 24 |

If, for example, each carton contains 24 containers, 17 cartons shall be opened. 12 containers shall be taken at random from 16 of them, totalling 192 containers and 8 containers shall be taken at random from the 17th carton. Identification of individual containers at this point is unnecessary.

(b) Examine visually the 200 containers for "swells", pinholes, and seam defects. Measure and inspect an appropriate number of the containers concerning the proper dimensions of the seams.

If no defective containers are found the lot is accepted.

If 3 or more defective containers are found reject the lot.

If 1 or 2 defective containers are found proceed to step (c).

(c) When 1 or 2 defective containers among the 200 containers are found, sort the whole lot for removal of defective containers.

If this sorting reveals more than 1% of defective containers reject the lot.

The 1 or 2 containers initially found defective are included in the number of defective containers. If the sorting reveals less than 1% defective cans caused by transit damage or poor can construction, proceed to step (d).

If there is doubt about the cause of the defective containers and especially when underprocessing may be suspected, the abnormal containers should be sent to a laboratory for cultural examination before proceeding to step (d).

If outgrowth of spore-forming bacteria are found in the containers, the entire lot should be rejected.

(d) 200 of the sorted, sound containers are taken at random for incubation testing, and the remaining containers of the lot are withheld.

(e) Identify the 200 containers mentioned under (d) in a proper manner and send them to a laboratory for incubation testing.

(f) In the laboratory incubate the 200 containers at 35°C for 10 days or at 37°C for 7 days.

(g) If any of the incubated containers show "swells" at ambient temperatures, reject the lot. If no "swells" occur choose 20 containers at random and proceed to step (h).

(h) Examine the 20 containers for pinholes and seam defects. The seams should be checked by a tear down test. If none show defects, accept the lot. Otherwise reject.

(i) If necessary to proceed beyond step (b), it will not alter the result, whether the sorting of the whole lot, or the incubation and testing under (d) to (h) is done first. If therefore incubation appears to be the less costly or more convenient of the two

procedures It may be done first. The sample number of 200 should be restored by the addition of one or two sound containers, and if this sample passes incubation testing, the lot should be sorted and judged under (c). If the sample does not pass, the lot should be rejected.

B. Non-shelf-stable meat products, heat-treated after packaging

- (a) Measure the air temperature, preferably with an electronic measuring device in the space between containers.
- (b) Sample 10 containers at random from at least 5 different cartons. Identification of individual containers at this point is unnecessary. Examine the 10 containers for "swells" and seam defects.
- (c) If the temperature does not exceed 10°C or any lower temperature specified by the shipper and if no defective containers are found, accept the lot. If one or more defective containers are found, reject the lot. If the temperature exceeds 10°C or any lower temperature specified by the shipper, proceed to step (d).
- (d) Sample 5 containers from the warmer places in the lot and withhold the lot. Proceed to step (e).
- (e) Identify the 5 containers mentioned under (d) in a proper manner and send them to a laboratory for microbiological examination. The transportation should take place under refrigeration, 10°C or less.
- (f) In the laboratory draw test portions from the 5 containers with aseptic precautions, so as to obtain one test portion from the center of each container and one test portion from the periphery of each container.
- (g) Examine these 2x5 test portions for aerobic plate count. Use ISO Standard (IS 2293) Aerobic Count at 30°C (Reference Method).
- (h) Reject if any of the 10 samples has an aerobic plate count exceeding 10,000 per gramme. Also reject if samples from the centre or the periphery of 3 or more of the containers show an aerobic plate count higher than 1000 per gramme. Otherwise accept
- (i) In case of rejection an investigation for specific organisms might be indicated.

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APPENDIX III

**PROPOSED DRAFT CODE OF PRACTICE FOR THE PRODUCTION, STORAGE
COMPOSITION OF MECHANICALLY SEPARATED MEAT AND POULTRY INTENDED
FOR FURTHER PROCESSING**

(At Step 5 of the Procedure)

NOTE

- | |
|---|
| <ol style="list-style-type: none">1. In the preparation of this Code recognition has been given to the need to avoid precluding the adoption of new technical developments provided these are consistent with the hygienic production of wholesome meat.2. This code should be read in conjunction with the Recommended International Code of Hygienic Practice for Processed Meat Products (CAC/RCP 13-1976). |
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1. Only bones, carcasses or parts of carcasses from slaughter animals or from poultry which have been approved for human consumption, should be used. Skulls should not be used.
2. Bones, carcasses or parts of carcasses should be kept or transported in at time/temperature combinations that will assure their hygienic acceptability when used for mechanical separation.

A selection of some suitable time/temperature combinations follow:

- (a) maintained at 10°C and mechanically separated within 5 hours of boning; or
 - (b) chilled to 4°C and mechanically separated within 72 hours of boning; or
 - (c) chilled to -2°C and mechanically separated within 120 hours of boning; or
 - (d) immediately placed in a freezer and frozen within 48 hours of boning.
3. The separating process should be carried out in such a way that bones and mechanically separated meat do not accumulate in the processing room in excess of good manufacturing practice. The temperature in the processing room should be controlled and held suitably low.
 4. Unless mechanically separated meat is used directly after the separating process as an ingredient of a meat product, it should be cooled down to a maximum of +4°C in conjunction with the deboning process or immediately afterwards.
 5. If not frozen or otherwise stored or transported in a hygienically acceptable state, the mechanically separated meat should be kept at a temperature not higher than +4°C measured in the meat and used for further processing within 48 hours. Mechanically separated meat which is intended to be frozen should be placed in a freezer at a maximum of -18°C and should be stored and transported at this temperature.
 6. Dismantling, cleaning and disinfection of the separate equipment should be carried out in accordance with section 34(f) of the Recommended International Code of Hygienic Practice for Processed Meat Products (CAC/RCP 13-1976).
 7. Composition: The calcium content of mechanically separated meat may not exceed [2.5%] calculated on dry matter.