

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
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ORGANIZATION



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Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Thirty-sixth Session

Washington DC, United States of America, 29 March – 3 April 2004

PROPOSED DRAFT GUIDELINES ON THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE TO THE [MANAGEMENT] OF *LISTERIA MONOCYTOGENES* IN FOODS

Comments at Step 3 submitted by Canada, and the United States of America

GENERAL COMMENTS

UNITED STATES OF AMERICA

The United States would like to thank Germany and its drafting group partners for the improvements that have been made in this document since the last Session. The United States notes that the document provides practical advice on the management of *Listeria monocytogenes* during primary production, processing and transportation of ready-to-eat foods. The document also does an excellent job of articulating the need for an effective environmental testing program.

The United States believes that the approach taken in the document - i.e., to follow the structure of the "International Code of Practice – General Principles of Food Hygiene", elaborating only on those provisions that are specific to *L. monocytogenes* while taking into account the Joint FAO/WHO Expert Consultation on Risk Assessment of Microbiological Hazards in *Listeria monocytogenes* in Ready-to-Eat Food – is reasonable and appropriate. However, we believe consideration should be given as to whether similar guidance is needed on how to identify and manage critical control points within the context of HACCP or other preventative control systems in situations where *Listeria* has been identified as a hazard.

INTRODUCTION

CANADA

Canada would like to extend its appreciation to Germany for leading the working group in the development of this document. The document is informative and provides clear guidance on key aspects to consider in the management of *Listeria* in foods.

Canada is supportive of the proposed draft document. We note, however, that a few sections and sub-sections are not numbered according to the Recommended International Code of Practice - General Principles of Food Hygiene CAC/CRP 1-1969, Rev. 3-1997, Amd. (1999). We recommend that this be corrected in the next version of this document.

UNITED STATES OF AMERICA

The 8th paragraph of the Introduction should indicate that one of the primary outcomes of the USDA FSIS risk assessment was that combinations of interventions are the most effective in controlling the risk rather than any single intervention.

In the 9th paragraph of the Introduction, consideration should be given to the fact that some products handled after opening may present lower risk for being a vector for cross-contaminating other than ready-to-eat products due to their packaging and handling requirements.

SECTION V - CONTROL OF OPERATION**UNITED STATES OF AMERICA**

This section should be revised to emphasize that ready-to-eat foods that do not support the growth of *Listeria monocytogenes* but may have low levels of this pathogen should not be a source of contamination to other ready-to-eat foods that may support the growth of this pathogen.

5.2.1 TIME AND TEMPERATURE CONTROL**UNITED STATES OF AMERICA**

Parameters should be developed to enable the users of the document to draw a distinction between foods that support the growth of *Listeria* and foods that do not support the growth of *Listeria*.

5.2.3 MICROBIOLOGICAL AND OTHER SPECIFICATIONS**UNITED STATES OF AMERICA**

Delete this Section. Although it is recognized that this section normally appears in the General Principles of Food Hygiene, the subject of microbiological criteria was effectively separated from this document and will be developed as a separate document.

SECTION VI - ESTABLISHMENT: MAINTENANCE AND SANITATION**UNITED STATES OF AMERICA**

The objective should stress that the ready-to-eat foods that do not support the growth but may contain low levels of *Listeria monocytogenes* should not be a source of contamination for other ready-to-eat foods that do support the growth of *Listeria monocytogenes*.

SECTION VIII – TRANSPORTATION**8.1 GENERAL****UNITED STATES OF AMERICA**

First paragraph – The phrase "to prevent an unacceptable increase in *L. monocytogenes*" should be reworded to read "to prevent the growth of *L. monocytogenes*". We believe the use of the phrase "unacceptable increase" would be dependent upon microbiological criteria which have not yet been established.

SECTION IX - PRODUCT INFORMATION AND CONSUMER AND INDUSTRY AWARENESS**CANADA**

We note that Section IX - Product Information and Consumer and Industry Awareness makes reference to treatment of patients by health care providers (2nd paragraph of Objectives in the boxed text) and to facilitating the rapid diagnosis of foodborne listeriosis (3rd paragraph of 9.1- Communication Programs). We question the appropriateness of including this type of recommendation as it appears to be outside the scope of Codex. The role of health care providers, in the Codex context, may be of providing information on food choices to individuals with particular health status as already noted in the Objectives of Section IX (in the boxed text, 1st paragraph, bullet point 2).

Also in Section IX, we recommend that text pertaining to industry awareness be moved to Section X - Training which appears to be the most appropriate placement for this type of recommendations.

9.1 COMMUNICATION PROGRAMS**UNITED STATES OF AMERICA**

The last bullet should have "or serve as a source of contamination" after "the growth of".

ANNEX 1: RECOMMENDATIONS FOR AN ENVIRONMENTAL MONITORING PROGRAM FOR LISTERIA SPP. IN PROCESSING AREAS**UNITED STATES OF AMERICA**

The Annex should be more fully developed to provide guidance regarding what should occur if a positive is found, either in terms of environmental sanitation or product disposition.

EDITORIAL CHANGES**UNITED STATES OF AMERICA****Editorial Suggestions****Background**

The background section should refer to the 35th and not the 34th session

Introduction

The 3rd paragraph of the introduction should begin “*L. monocytogenes* can cause“

The last sentence of the 6th paragraph of the introduction should be reworded to read “. . . and (3) a product pathway analysis conducted by the USDA Food Safety and Inspection Service which examined the risk of contamination of processed meat from food contact surfaces.”

Section I – Objectives

The first sentence should be changed to read “. . . framework for the management of *L. monocytogenes* . . .“

Section II – Scope

Add “/recontamination” after “contamination” in the second sentence.

Section III – Primary Production

Add “listericidal” after “more” in the first sentence

Add “and level” after “prevalence” in the second sentence

5.2.1 Time and Temperature Control

Add “preferably below” before “2° – 4° C” in the second sentence. This change should be made throughout the document for consistency.

Section 6 – Establishment: Maintenance and Sanitation

The first sentence of “Objectives” should be revised to make it less awkward and difficult to read.

6.1.1 General

In the second paragraph, delete “and support structures for equipment” at the end of the 3rd sentence, since it appears twice in the sentence.

Add “during” after “or” in the last sentence of the 3rd paragraph

Section VIII – Transportation

Objectives box - Delete the boxes and fix spacing after “Measures should be taken where necessary.”
Delete colon after “Objectives”

8.1 General

Replace parenthetical in the first sentence to read “preferably below 2° - 4° C”. Change “temperature” to “temperatures” and delete “which” before “should”.