

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 8

CX/FH 04/8 -Add.1

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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

Comments on the

**PROPOSED DRAFT REVISED CODE OF HYGIENIC PRACTICE FOR EGGS AND EGG
PRODUCTS (CAC/RCP 15-1976)**

**Submitted by Argentina, Canada, Colombia, Iran Islamic Republic of, Mexico and the United
States of America**

GENERAL COMMENTS

CANADA

Canada would like to extend its appreciation to Australia for the work done on this document which as a result is greatly improved. We have a few comments as follows.

IRAN, ISLAMIC REPUBLIC OF

We suggested that some changes to be made in the above document. Fortunately all suggestions have been accepted except the followings:

1. enteritidis should be written in italics, with small e. also the

abbreviation should be in small letters :se

2. Add a new item: some control measures must be conducted to avoid transmission of contamination from hens to personnel. Would you please reconsider these items, particularly No 2.

UNITED STATES OF AMERICA

The United States would like to express its appreciation to Australia and the other drafting partners for their efforts in the further development of this document. While this document represents an improvement over previous versions, we believe that further details are necessary to enable the implementation of the different control measures that can be used to assure the safety of eggs and egg products. To that end, we look forward to continued participation in the efforts of the drafting group.

At this time, we offer the following drafting suggestions in preparation for the upcoming deliberations on this document during the 36th Session of CCFH.

2.1 SCOPE**COLOMBIA**

First paragraph, first sentence, modify to read "This Code applies to the production, sorting or storage, and processing of egg products of domesticated birds..."

2.3 PRINCIPLES APPLYING TO THE PRODUCTION, HANDLING AND PROCESSING OF ALL EGGS AND EGG PRODUCTS**COLOMBIA**

First paragraph, modify to read, "The following principles should apply, where appropriate and practicably applicable, to the production, sorting, and processing of egg products."

We consider that production includes egg laying in farms, sorting, the various stages of receiving, grading and packaging, storage in a distribution center, and processing into final products.

Third bullet, (second paragraph), last sentence, modify to read:

In the case where HACCP is not implemented at the producer level, good hygienic or manufacturing practices, as well as good agricultural and biosafety practices, should be followed. (It would be ideal to define these terms in Section 2.5 Definitions.) There (are) would be repeated references to... good hygienic or manufacturing practices as well as good agricultural and biosafety practices...

UNITED STATES OF AMERICA

Section 2.3, first paragraph: Change "practicably applicable" to "practicable," since the preceding paragraph states that "where practicable" is the parenthetical statement that will be used in the document to indicate flexibility.

2.4 RELATIVE ROLES OF EGG PRODUCERS, PROCESSORS AND TRANSPORTERS**UNITED STATES OF AMERICA**

Section 2.4, first paragraph: Insert comma between "packaging" and "processing" in the second sentence.

2.5 DEFINITIONS

[Collection and handling –

COLOMBIA

This term should not be used; only egg handling should be used because handling includes everything described in this term, in fact, the term is used throughout the chain. Collection is a step in the chain and it also includes handling.

Egg laying establishment –

CANADA

Egg Laying establishment should be moved to the next line.

Laying flock-

CANADA

We would like to suggest that this definition also include reference to age. Only one age group should be retained in a laying facility (*laying establishment*) as this makes complete cleaning and disinfecting possible. Therefore the definition would be as follows:

Laying Flock - a group of domesticated birds **of one age** kept for the purpose of production of eggs for human consumption

[Pasteurization]

COLOMBIA

Modify to read " Pasteurization of eggs, egg whites and yolks - a heat treatment or microbiocidal control measure where eggs, egg whites and liquid yolks are subjected to a process to reduce the load of pathogenic microorganisms to an acceptable level to ensure safety."

MEXICO

We suggest that the term “pasteurization” be harmonized with definitions established in other Codex documents.

Producer –

COLOMBIA

Sometimes the producer is responsible for the whole chain; the producer is not only the one who participates in primary production (egg laying).

3 PRIMARY PRODUCTION

Contamination of eggs from personnel, animal and environmental sources during primary production should be minimized.

CANADA

First paragraph, the text is not clear. We suggest the following:

Producers should obtain domesticated birds from breeding stocks that have been subject to control measures to reduce and, if possible, eliminate the risk of introducing **into laying flocks** poultry diseases and pathogenic organisms transmissible to humans. The breeding flocks should be subject to a programme **which** will monitor the effect of the control measures.

Last paragraph (9th paragraph), the text is not clear. We suggest the following:

The microbial load of eggs should be as low as achievable, using good egg production practices, taking into account the requirements for subsequent processing. Measures should be implemented at the primary production level to reduce the initial load of pathogenic microorganisms affecting safety and suitability. ~~to the extent possible to provide for a greater margin of safety and/or to prepare the eggs in a way that~~ Such measures would permit the application of microbiological control measures of lesser stringency ~~effectiveness than might otherwise be needed to assure~~ and still ensure product safety and suitability.

3.1 ENVIRONMENTAL HYGIENE

CANADA

5th bullet point (3rd dash), because rodents can be an important issue in egg laying establishments and could be considered as wild animal, we would like to suggest to add a statement in this section even though it may be covered under 3.2.3.3.:

As far as possible, domestic and wild animals, including wild birds, **as well as rodents**, should be excluded from egg laying establishments.

1st paragraph after the bullet points, first sentence, "...should be analysed... We would like to suggest that the word "analysed" be replaced by "**tested**".

In the same paragraph "and judicious selection and use of natural fertilizers and agricultural chemicals should also occur." The word "natural" could be interpreted as suggesting that the industry use "organic" fertilizers and chemicals.

Therefore, we would like to suggest to delete the word natural as per the following: "and judicious selection and **use of fertilizers** and agricultural chemicals should also occur."

3.2.1 Flock Management and Animal Health

CANADA

4th bullet point, we would like to suggest that the word "following up" be replaced by "**investigating**".

7th bullet point, Monitoring for SE through faecal testing and the use of a vaccination protocol may reduce the risk of human illness. Faecal testing should not be the only acceptable testing procedure. For example, the Canadian industry has adopted environmental testing e.g. testing of ventilation fans and egg contact surfaces.

Therefore, we would suggest to add the following:

Monitoring for SE can also include environmental testing of litter, dust, ventilation fans, etc.

3.2.2 Areas and Establishments for Egg Laying Systems

CANADA

2nd bullet point, We would like to suggest to add the following:

The facilities used to house flocks should be cleaned and disinfected in a way that reduces the risk of transfer of zoonotic pathogens **to the next flock. An All-in, all-out step should be followed. Such a process would give the opportunity to eliminate rodents and insects before the next flock is introduced.**

In addition, since rodents have been found to be a source of reinfection we suggest to add another bullet point as per the following:

Since rodents have been found to be a source of re-infection in barns following clean-ups, special attention should be given to prevent harbourage and infestation from rodents.

MEXICO

Fourth bullet - In the Spanish version of the document, we propose modifying the text as follows: “Debería manejarse el uso de la cama de tal manera que reduzca el riesgo...” (Use of litter should be managed in a manner that reduces the risk...).

3.2.3.1 Watering

MEXICO

Fourth bullet -(First bullet) In the Spanish version of the document, we recommend changing the term “agua potable” (potable water) to “agua para beber” (drinking water).

UNITED STATES OF AMERICA

Section 3.2.3.1, first bullet point: Change “in” to “is.”

3.2.3.2 Feeding

ARGENTINA

Third bullet, considering the risk involved in using contaminated raw materials for feed production, Argentina proposes the addition of a second and third paragraph under item **3.2.3.2 Feeding** that expresses the following:

The current wording of the document says:

Good purchasing practices for feed and feed ingredients, to minimize the risk associated with hazards in the feed may include using vendor assurances or contractual agreements.

The following wording is proposed

Good production practices for feed as well as purchasing practices for feed and feed ingredients where appropriate, should be used to minimize the risk associated with hazards in the feed, providing for verifications of the above mentioned, by means of bacteriological controls of raw materials, such as viscera or meat flour, and of the finished product; these controls may be included within vendor assurances or contractual agreements.

3.3 COLLECTION, HANDLING, STORAGE AND TRANSPORT OF EGGS

COLOMBIA

Modify the title to read "**3.3 Collection, Grading or Storage and Transport of Eggs**"

3.3.2 Packaging and storage

COLOMBIA

3.3.2 Grading, Packaging, and Storage

The grading operation, where available, should meet the following requirements:

Maintenance, cleansing and disinfection will be applied to equipment, which will be kept clean.

Equipment operation and its physical or mechanical elements, including lubrication substances used in the equipment or in sorting machines, will not present a contamination risk to the product.

For occupational health or industrial safety purposes, the exposure and working schedules of the personnel responsible for machinery operation will be evaluated in order to perform the pertinent labor rotation for workers in the required tasks.

Packaging system...

Personnel participating in this process, within the grading establishment, should be different from the personnel working in primary production or egg laying processes.

3.4.1 Cleaning and maintenance of egg laying establishments

CANADA

2nd paragraph, second sentence, we suggest to replace the word "refer" by "include" to read "...Such programs should include all equipment, housing and buildings.

MEXICO

Second paragraph - Delete the square brackets surrounding the term "appropriate".

3.4.2.3 Health status

CANADA

First paragraph, states "...disease or illness likely to be transmitted to birds..." It may be useful to list examples of such diseases and illnesses in order to understand better what is referred to in this paragraph.

3.5 DOCUMENTATION AND RECORD KEEPING

MEXICO

We recommend including a bulleted point regarding "Health status of personnel."

We recommend identifying the meaning of SE throughout the document.

Principles Applying to the Processing of Eggs:

5.1 CONTROL OF FOOD HAZARDS

UNITED STATES OF AMERICA

Section 5.1, first italicized paragraph: Add sentence to end of paragraph, “Dirty eggs should be visibly clean prior to breaking and subsequent processing into egg products.”

5.2.2 GRADING AND PACKAGING

ARGENTINA

Subheading "Storing", first bullet, footnote, On page 23 (of the document version in Spanish) there is a footnote identified under 7; it should be identified under 12. Moreover, the following wording is proposed:

¹²Storage of eggs at 15°C (<50°F) at relative humidity of 80% approximately or limiting storage at ambient temperatures, at the conditions of the storage place, the distribution system and the geographical area, are conditions projected to comparably reduce risk of human illness, with the actual reduction dependant on the prevalence of SE within flocks and other variables. Joint FAO/WHO Expert Consultation on Risk Assessment of Microbiological Hazards in Foods, FAO Headquarters, Rome, Italy 30 April – 4 May 2001, page 14.

MEXICO

Storage - The footnote identified as no. 7 should be no. 12.

UNITED STATES OF AMERICA

Section 5.2.2, 8th paragraph: Change the last sentence to read “These eggs should be identified in such a way that they cannot be used for human consumption, for example by a denaturing agent (additive that makes it clearly visible that the eggs should not be processed into human food) that indicates membrane penetration/damage or unsuitability for human consumption.”

5.2.3 *Egg Processing*

UNITED STATES OF AMERICA

Section 5.2.3, first italicized paragraph: Insert “unintentionally” between “may” and “occur,” since the paragraph preceding this states that commingling of shell and egg contents should never occur. Also, in the same paragraph, delete the phrase “the use of cleans eggs and” since the preceding paragraph states that only clean eggs should be used in processing.

Section 5.2.3, 5th paragraph after the heading “Treatments”: Change “planned” to “appropriate.” We recommended this during the meeting in Brussels, and thought the group agreed to the change.