

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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Agenda Item 5

CX/FH 05/37/05- Add.1

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Thirty-Seventh Session

Buenos Aires, Argentina, March 14 – 19, 2005

### COMMENTS ON THE

### PROPOSED DRAFT GUIDELINES ON THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE TO THE [CONTROL] OF *LISTERIA* *MONOCYTOGENES* IN READY-TO-EAT FOODS

Submitted By: the United States of America and International Dairy Federation (IDF)

#### GENERAL

##### UNITED STATES OF AMERICA

The United States would like to thank Germany and other members of the working group for the significant improvements that have been made to the guideline document and annex I since the last Session. As directed by CCFH, these documents are based on the existing General Principles of Food Hygiene guidelines and specifically address unique issues related to *L. monocytogenes*. The U.S. believes that the guidelines document and Annex I are well written and, after incorporating suggested changes, can advance to Step 5. CCFH may consider an accelerated advancement with these documents going to Step 8.

Annex II This is the first draft of this annex. It appropriately focuses on describing the FSO, PO and MC paradigm and on the process for determining appropriate values for these control points.

CCFH should consider a JEMRA Expert Consultation to further articulate the concepts that are presented in this annex. These concepts are applicable to all microbial pathogens, not just *L. monocytogenes*.

The progress through CCFH of Annex II should be separated from the Guidelines document and Annex I. We recommend Annex II should be returned to the Step 2 of the Codex process.

##### IDF

IDF would like to congratulate the Codex CCFH Drafting Group under the leadership of Germany for the excellent work done in revising the document. We would like to put forward the following comments for consideration by the CCFH.

The main body and Annex 1 of the present draft are concise and clear. The messages coming from published risk assessments have been taken on board. The draft clarifies the peculiarities of *L. monocytogenes* as regards the persistence of this micro-organism in food industry premises including its ability to grow at temperature close to 0°C and to dwell in “harbourage sites”. The focus is set appropriately on the importance of temperature and maximum duration of shelf life, and on the needed information that should be brought to the consumers and health care providers.

Annex 2 is highly innovative, as it contains the first occurrence in a Codex document of the application of the new concepts, Food Safety Objectives and Performance Objectives. The underlying notions may be new to many people and especially the order of magnitude of FSO relative to microbiological criteria, the influence of uncertainties introduced by the sampling plans and measurement errors. CCFH may wish to consider the inclusion of some explanatory notes in the final version of the document in order to facilitate the understanding of these new concepts. For example the nature of the sampling plans and the way to apply them would need further explanation.

## **5.1 CONTROL OF THE FOOD HAZARD**

### **IDF**

Second paragraph refers to "The factors and attributes described below ... " that typically may be identified as CCPs. There is no specific list or sub-paragraphs of 5.1 - so it is unclear which components are referred to. If the intention is to refer to all the listed measures in 5.2-5.9 - then the statement cannot be true as these sections include a number of measures that cannot or should not be CCPs.

## **5.2 KEY ASPECTS OF HYGIENE CONTROL SYSTEMS**

### ***5.2.1 Time and temperature control***

#### **UNITED STATES OF AMERICA**

Second paragraph, last sentence, the discussion on selecting an appropriate length of shelf-life (Section 5.2.1) states that “[shelf-life studies] should account for the fact that appropriate low temperatures may not be maintained throughout the entire food chain...” Further elaboration is needed to indicate what degree of temperature abuse should be accounted for by the specified storage time. For growth supporting foods, there would be no feasible designated shelf-life that would ensure safety after a severe abuse.

### ***5.2.2 Specific process steps***

#### **IDF**

The document seems to categorize food very roughly into those not supporting growth and those that do (the word “listeriostatic” [or “listeristatic”] could be used in parallel to the word listericidal). We have serious doubts about the usefulness of such a classification of foods (Annex 2, Table 1), because it cannot be fully comprehensive; for example soft cheeses are presented as one homogeneous category whereas some of them, because they are purposely made acidic, are “no growth” products. Considering growth dynamically, e.g. within temperature ranges, in order to account for all possible scenarios, might be better but would also complicate the classification without clear benefit to the reader. In section 5.2.2 this would imply that the last para should include the concept of using control measures that reduce the growth rate (in addition to those that stop growth).

A pH of 4.0 could be replaced by more realistic values such as 4.2 or 4.5.

## **9.4 COMMUNICATION PROGRAMS**

### **UNITED STATES OF AMERICA**

Second paragraph, consumer information (Section 9.4) should recommend the placement and use of thermometers inside home refrigerators. A mention of Time-temperature indicators could be mentioned as a possible tool to prevent consumption of foods that have been abused.

## **ANNEX I: RECOMMENDATIONS FOR AN ENVIRONMENTAL MONITORING<sup>1</sup> PROGRAM FOR *LISTERIA MONOCYTOGENES* IN PROCESSING AREAS**

### **d) Sampling locations and number of samples**

#### **IDF**

first sentence: “complexity of the process” could be replaced by “process and complexity of the equipment”; “and with the control system applied”» could be added to the end.

**ANNEX II. Deriving microbiological limits and sampling plans in microbiological criteria from food safety objectives; example: *Listeria monocytogenes* in ready-to-eat food products.**

## **1.3 MICROBIOLOGICAL CRITERIA**

### **UNITED STATES OF AMERICA**

Section 1.3 will necessarily be a concise discussion, references should be included where readers can get more complete explanations. Figures 3 and 4 need to be added.

#### **IDF**

Annex II - section 1.3 (MC): The missing figures 3 & 4 are essential in order to provide a good understanding in regard to the nature of sampling plans.

## **3.1 PASTEURIZED MILK**

### *3.1.2 Product/process specific assumptions*

#### **IDF**

Third bullet, a growth rate following a linear model of 1.0 log/day is unrealistically high and does not take into account for lag time (broth models use 0.9/day - for milk. 0.5-0.6 seems more realistic with 1-2 days of lag time) - but no need to comment on this if it is clear that the assumptions are only for illustrative purposes.

### *3.2.4 Conclusions*

### **UNITED STATES OF AMERICA**

Final sentence in 3.2.4 is not needed and may not be accurate.

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<sup>1</sup> Environmental monitoring is not to be confused with monitoring as defined in the HACCP.