

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 8

CX/FH 05/37/08 - add.1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Thirty-seventh Session

Buenos Aires, Argentina, 14 - 19 March 2005

COMMENTS ON THE

PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR EGGS AND EGG PRODUCTS (CAC/RCP 15-1976 (AMENDED 1978, 1985))

In response to CX/FH 05/37/08, comments were submitted by Argentina, Canada, Venezuela, and the United States of America.

GENERAL COMMENTS

ARGENTINA

Argentina appreciates the opportunity to submit comments on this document.

Argentina believes that this is a complete document which encompasses all shell egg and egg product-related aspects. We therefore appreciate the drafting group's good work.

CANADA

Canada would like to congratulate Australia for the work done on the document which we consider to be greatly improved. We only have one minor comment as follows.

UNITED STATES OF AMERICA

The United States would like to thank and congratulate Australia and the other members of the drafting group for the significant progress shown in this document. We are generally very pleased with and strongly support this Draft Code of Hygienic Practice for Eggs and Egg Products.

In preparation for the upcoming deliberations on this document during the Committee's 37th Session, we appreciate the opportunity to provide the following comments on this important document and look forward to the discussion of this agenda item.

TITLE**VENEZUELA**

Applies to the Spanish version only], modify the title to read as follows:

ANTEPROYECTO DE CÓDIGO DE PRÁCTICAS DE HIGIENE PARA LOS HUEVOS Y PRODUCTOS **DERIVADOS** DEL HUEVO

INTRODUCTION**VENEZUELA**

First paragraph, first sentence, replace with “This International Code of Hygienic Practice for Eggs and Egg Products is intended to provide guidance for the safe **hygienic** production of eggs and egg products.

UNITED STATES OF AMERICA

In the third sentence of the second paragraph, replace the phrase “egg producing bird” with the word “avian.”

1 OBJECTIVES**VENEZUELA**

Replace first sentence with “The objective of this Code is to ensure the safety and suitability of eggs and egg products by applying the Recommended International Code of Practice: General Principles of Food Hygiene, CAC/RCP 1- 1969, Rev. 3, 1997, **to this particular case** of eggs and egg products.”

2.1 SCOPE**VENEZUELA**

First paragraph, replace first sentence with “This Code applies to the **primary** production, sorting, grading, storing, **transport**, and processing, **and distribution** of eggs and egg products of domesticated birds, intended for human consumption. Traditional delicacy eggs...”

2.2 USE OF THE DOCUMENT**VENEZUELA**

We propose the following text for the subtitle:

Application of this Document in the Production and Processing of Eggs by Small-Scale **and/or** Less Developed Egg Producers/Businesses

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

Replace the Subtitle with “**PRINCIPLES APPLYING TO THE **PRIMARY** PRODUCTION, HANDLING AND PROCESSING OF ALL EGGS AND EGG PRODUCTS**”

Second paragraph, first principle, [Applies to the Spanish version only], modify the sentence to read as follows: **Desde la producción primaria hasta el punto de consumo los huevos y productos**

derivados de huevo deberían ser sometidos a mediadas de control que han demostrado su capacidad para lograr el nivel adecuado de protección a la salud pública

Third paragraph, revise first sentence to read “The code is aimed at encouraging the safe production of eggs and egg products for human consumption, and gives relevant guidance to producers and processors, large and small, on the application of control measures throughout the entire food chain.”

2.4 RELATIVE ROLES OF EGG PRODUCERS, PROCESSORS AND TRANSPORTERS

VENEZUELA

Substitute the title with “**RELATIVE ROLES OF EGG AND EGG PRODUCTS PRODUCERS, PROCESSORS, AND TRANSPORTERS AND DISTRIBUTORS**”

Introductory paragraph, first sentence, replace with “All parties involved in the egg production chain share responsibility for food safety and suitability. ~~This~~ These can include those involved in primary production, handling, grading, packaging, processing, supplying, distributing and commercial ~~ooking~~ preparation of eggs and egg products for human consumption.

2.5 DEFINITIONS:

VENEZUELA

Substitute the definition for **Microbiocidal treatment** with the following; “**Microbiocidal treatment** is a control measure, for example, pasteurization, that practically eliminates the number of ~~microorganisms, including~~ pathogenic microorganisms present in a food or reduces them to a level at which they do not constitute a health ~~hazard~~ risk.”

Pasteurization - a microbiocidal control measure where eggs or egg products are subjected to a thermal process, ~~using heat~~ to reduce the load of pathogenic microorganisms to an acceptable level to ensure safety.

Note: To facilitate the understanding of the text, the definitions for Pasteurized Egg and Processed Egg Product should be included.

UNITED STATES OF AMERICA

- Add a definition for “Avian – members of the class Aves.”
- Delete the definition for “Domesticated birds” and replace with a definition for “Domesticated – tame.”
- Add a definition for “Infected flock - a group of birds that have been determined by environmental sampling, serological sampling, egg testing or other procedure as determined by the relevant authority, to be infected with Salmonella.”
- In the definition for “table egg,” add the word “functional” before “properties.”

3 PRIMARY PRODUCTION

UNITED STATES OF AMERICA

In the first sentence of the fourth paragraph, delete the word “on” between “impact” and “the.”

VENEZUELA

Tenth paragraph, first sentence replace it with “Laying flock management is key to safe **hygienic** primary production of eggs. Laying flocks...”

Note: From this point forward, the term “safe production” should be changed to “hygienic production” since it not only includes the safety but also the suitability of the food.

3.2.1 Flock Management and Animal Health

VENEZUELA

Improve the wording or translation of the following paragraph (first). We propose the following: “Eggs should come from flocks (both breeding and laying) in good health so that flock health does not adversely affect the safety and suitability of the eggs.” (Eliminate the term “adversely”)

Second paragraph, [Applies to the Spanish version only], modify the sentence to read as follows: La evaluación del riesgo de *Salmonella enteritidis* (Se) ha mostrado **que** la reducción de prevalencia de parvadas infectadas con Se resultará en una reducción en el riesgo de enfermedades humanas debido al consumo de huevos **contaminados con Se**

UNITED STATES OF AMERICA

In the eighth main bullet point, add the following sentence: “If a vaccination protocol is used, it should be approved by the relevant authority.”

VENEZUELA

In the ninth bullet point, substitute it with “Eggs from infected flocks still in production and that represent a risk to human or flock health, should be disposed of ~~in a safe manner~~ or **specifically** diverted ~~ing them~~ to a process that ensures elimination of a hazard.”

3.2.2 Areas and Establishments for Egg Laying Systems

VENEZUELA

Second paragraph, to improve the wording and translation, we propose the following: [Applies to the Spanish version only], modify the sentence to read as follows: Las áreas y locales **para el alojamiento de las parvadas y la postura indebidamente protegidos y mantenidos**, en especial para los sistemas de producción a campo abierto y en gallineros, puedan contribuir a la contaminación de los huevos.

3.2.3.1 Watering

VENEZUELA

Improve the wording and translation. We propose the following: [Applies to the Spanish version only]

Modify the first sentence to read as follows: “El agua debería ser manejada de manera tal que se reduzca la posibilidad de la transmisión de peligros, directa o indirectamente, al interior o en la superficie de los huevos.”

Fourth paragraph, modify it to read, “As drinking water ~~water~~ can be a source of contamination, the need to ~~treatment of drinking water~~ it to reduce or eliminate pathogens including Salmonella should be considered.”

3.2.3.4 Agricultural and Veterinary Chemicals

UNITED STATES OF AMERICA

In the seventh bullet point, add the words “national legislation and/or” before “the manufacturer’s directions.”

3.3 Collection, Handling, Storage and Transport of Eggs

UNITED STATES OF AMERICA

In the second bullet point, delete the words “or packing.”

3.4 CLEANING, MAINTENANCE AND PERSONNEL HYGIENE AT PRIMARY PRODUCTION

ARGENTINA

Argentina believes that the wording of item 3.4 is not appropriate and thus suggests that it be redrafted as follows:

“De-populated cleaning procedures should cover cleaning and/or sanitising nest boxes/cages, poultry houses, disposing of contaminated litter, nesting materials and faeces and, where necessary, safe disposal of eggs from infected flocks and dead or diseased birds.”

VENEZUELA

We propose the following wording:

CLEANING AND MAINTENANCE OF THE ESTABLISHMENT AND PERSONNEL HYGIENE AT PRIMARY PRODUCTION

3.4.1 Cleaning and maintenance of egg laying establishments

UNITED STATES OF AMERICA

In the third paragraph, delete the word “contaminated” and the phrases “from diseased birds,” and “and dead or diseased birds.”

3.4.2.2 Health status

VENEZUELA

Second paragraph, last sentence, substitute with “**Any person so affected should immediately report illness or symptoms of illness to the management his/her immediate supervisor**”

3.4.2.4 Sanitary facilities

CANADA

We suggest adding another bullet point in that section:

Facilities should:

Not open directly in the laying room

3.5 DOCUMENTATION AND RECORD KEEPING**VENEZUELA**

Second paragraph, replace it with “With respect to food safety, records should be kept, **at least for one year**, on **the following**:”

5 CONTROL OF OPERATION**VENEZUELA**

Second paragraph, first sentence, **we propose the following wording**: “This section refers to control measures that should be taken to prevent, eliminate or reduce hazards when processing eggs **with shells** and when producing egg products.”

5.1 CONTROL OF FOOD HAZARDS**ARGENTINA**

Argentina believes that the section in item 5.1 referring to the possibility of using dirty eggs if they are cleaned appropriately should point out that no wet cleaning programs should be used, as the protective cuticle of the egg—which prevents the shell from becoming permeable—may be eliminated.

VENEZUELA

Substitute the following:

Table **eggs**

~~Unsafe or~~ **unsuitable eggs include**:

Egg Products

First bullet, replace it with “Cracked or dirty eggs that.....or be disposed of in a **safe hygienic** manner.”

5.2.1 Temperature and time issues**VENEZUELA**

Replace the subtitle with “**5.2.1 Time and Temperature Issues**”

First paragraph, first sentence, [Applies to the Spanish version only], modify the sentence to read as follows; Desde **la recepción** de huevos, la manipulación.....

5.2.2.1 Processing of table eggs**UNITED STATES OF AMERICA**

- In the third paragraph under the third principle, change the word “process” to “method.”
- In the first bullet point under “washing, disinfection and drying,” change the word “soaked” to “submerged.”

- In the second bullet point under “Shelf life for table eggs,” delete the words “methods and.”

VENEZUELA

Cleaning

Third bullet, [Applies to the Spanish version only], modify the sentence to read as follows:

“Si se procede **a la limpieza** en seco...”

(iii) **Storage and distribution**

[Applies to the Spanish version only], first sentence, modify the sentence to read as follows:

Los huevos deberían ser almacenados y transportados bajo condiciones que no **afecten** adversamente **su** inocuidad e idoneidad.

(iv) **Shelf life for table eggs**

Fifth bullet, substitute it with “Type of packaging; **preferably utilizing polystyrene or other hygienic materials.**”

ARGENTINA

As regards **footnote 7 on page 24** of the Spanish version, Argentina suggests changing its wording by omitting the last two sentences. Thus, the text should be read as follows:

“Joint FAO/WHO Expert Consultation on Risk Assessment of Microbiological Hazards in Foods, FAO Headquarters, Rome, Italy 30 April – 4 May 2001, page 14.”

5.2.2.2 Egg Product Processing:

UNITED STATES OF AMERICA

- We are concerned that a literal interpretation of the fourth principle (“Separating the egg contents from the shell should be done in a manner that will, as far as possible, avoid cross-contamination between the shell and egg contents, and avoid contamination by personnel or from equipment”) will allow the use of centrifuge egg breaking (or “crushing”), an unsanitary practice that allows cross-contamination of liquid egg meat with crushed shells and the bacterial and material contaminants associated with the shells. The current wording of this principle may allow centrifuge egg breaking as long as liquid egg meat is quickly removed from the crushed eggs, since the time of cross-contamination would be minimized. Unfortunately, rapid removal of the egg shells from the liquid will not undue the contamination. Further, it is impossible to examine egg meat from individual shell eggs. Even badly decomposed eggs are not detected and rejected in centrifuge egg breaking. Modern egg-breaking machines are designed to cause breaking of eggs on an individual basis and minimize contact between the shell and egg meat. The United States recognizes that smaller firms or less-developed countries may not have modern mechanized egg breaking equipment readily available; however, this should not deter handling eggs in a safe and sanitary manner. Long before egg breaking was mechanized, eggs in the United States were required to be individually hand broken using unsophisticated equipment that allowed examination of the contents of each egg and that prohibited commingling of the shell and

egg contents. For these reasons, we strongly recommend the language in this principle be strengthened to clarify that the Code does not permit centrifuge egg breaking or breaking by any means that does not permit individual examination of egg contents or prevent gross cross-contamination of egg meat and shells. We propose the following alternate language for the fourth principle: “Separating the egg contents from the shell should be done in a manner that permits individual examination of egg contents, avoids cross-contamination between the shell and egg contents, and avoids contamination by personnel or from equipment.”

- In the fifth bullet point under “Shelf life for egg products,” insert the word “Processing” before “methods.”

9.1 Lot Identification

UNITED STATES OF AMERICA

In the second sentence of the last paragraph, replace the phrase “no shorter than the shelf life” with “of at least 6 months from the date of production.”