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FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 4 **CX/FH 09/41/4 Add.1**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Forty - first Session

The Loews Coronado Bay Hotel, San Diego, California, 16 - 20 November 2009

PROPOSED DRAFT GUIDELINES FOR CONTROL OF *CAMPYLOBACTER* AND *SALMONELLA* SPP. IN CHICKEN MEAT

(N08-2007)

COMMENTS AT STEP 3 SUBMITTED BY

AUSTRALIA, COSTA RICA, CUBA, INDIA, JAPAN, KENYA, MEXICO, PHILIPPINES &THE WORLD ORGANISATION FOR ANIMAL HEALTH (OIE)

AUSTRALIA

General Comments

Australia acknowledges the work undertaken by the working group lead by New Zealand and Sweden progressing the draft Guidelines for the Control of *Campylobacter* and *Salmonella spp.* in Chicken Meat. The document has been further consolidated following outcomes of the FAO/WHO Technical Meeting of *Salmonella* and *Campylobacter* in Chicken Meat and provides significant guidance for Member Countries on control of *Salmonella* and *Campylobacter*, particularly in regards to GHP-based measures.

While acknowledging the incorporation of quantifiable hazard-based controls are provided as examples only, Australia has some reservations regarding the certainty around the outcomes provided (see specific comments). As discussed in Paragraph 13, hazard-based controls have only been included where there is verification data under conditions of commercial use. If quantitative descriptions of outcomes are provided in the guideline document, we suggest that the variability and/or uncertainty be more explicitly expressed (or should be elaborated further in the introductory text). For example, the quantifiable outcomes reported for control measures are specific to the conditions of that particular study, and would need to be validated under local conditions to provide a meaningful estimate of hazard reduction. Consideration may also need to be given as to whether inclusion of this level of detail in the draft guidelines would require on-going review as new data becomes available.

Australia gives in-principle support for development of the web-based decision tool, however formal comment will be made following demonstration of the tool at the 41st Session of the Codex Committee on Food Hygiene.

Specific Comments

Paragraph 32 At the start of the sentence add "Personnel involved in the transportation of day-old chicks to parent flocks" so that the sentence would read "~~The driver~~ **Personnel involved in the transportation of day-old chicks to parent flocks** should not enter any livestock buildings and should prevent cross contamination of day old chicks during loading and unloading."

> Rationale: To avoid confusion regarding measures that should be undertaken by all personnel involved in the transportation of day-old chicks.

Paragraph 35 At the start of the sentence add the words "Personnel involved in the transport of day-old chicks" so that the sentence would read "~~The driver~~ **Personnel involved in the transportation of day-old chicks** should not enter any livestock buildings and should prevent cross contamination of day old chicks during loading and unloading."

Rationale: To remain consistent with paragraph 32.

Paragraph 37 Delete footnote so that the sentence would read "A pest programme should be designed according to local conditions[~~31~~]."

Rationale: There are many measures available to control pests (rodents/insects etc). It is not clear why control of flies has been highlighted.

Paragraph 39 Delete the footnote so that the sentence would read "Where specific control measures are intended to be used e.g. competitive exclusion[~~32~~], organic acids in pre-slaughter drinking water and organic acids or formaldehyde in feed, a competent authority may require such control measures to be approved before permitting their use."

Rationale: The example provided in the footnote of a 50% reduction in Salmonella prevalence from use of competitive exclusion treatments does not capture the variability of reported results.

Paragraph 63 If this hazard-based control measure is to be included, it would be useful to provide additional information on the study/test conditions e.g. free/total chlorine concentration, pH, flow/application rate etc. Also for Paragraphs 65 and 66.

Rationale: Clarification

Paragraph 68 The reference to reduction of *Salmonella* prevalence from 50% to 'zero' would be better described as reducing levels from 50% to 'levels below detection' so that the sentence would read "The use of acidified sodium chlorite (750ppm, pH 2.5, spray application) has in one industrial setting been shown to reduce *Salmonella* prevalence on carcasses from about 50% to ~~zero~~ **to levels below detection**."

Rationale: Clarification

Paragraph 79 Replace reference to 'zero' with 'levels below detection' so that the sentence would read "The use of acidified sodium chlorite (750 ppm, pH ≈ 2.5, immersion dip) post-chill has been shown to reduce prevalence of *Salmonella* positive carcasses from 16% to ~~zero~~ **levels below detection**.

Rationale: Clarification

COSTA RICA

Costa Rica thanks the Codex Committee on Food Hygiene and the working group for the discussion on the "Proposed Draft Guidelines for the Control of Campylobacter and Salmonella spp. in Chicken Meat." Our comments are presented below:

Regarding number 8.11.1.43, Measures based on GHP for *Campylobacter***.** Costa Rica thinks that the term "drying of the crates" [in the English version "dried"] should be deleted from the paragraph given that it has been scientifically proven that drying the crates has no effect on diminishing the growth of microorganisms on such crates.

CUBA

Cuba supports the document fh41_04.

INDIA

Section 3 Scope and use of the Guideline

3.1 Scope

In the second paragraph, it is stated that the guidelines are specifically meant for typical industries systems & controlled-environment housing systems. It excludes the larger group of the small stakeholders. In developing countries, most of the chicken meat producing units are in the small scale and cannot be

categorized in any of the above mentioned systems. In light of this, the scope should be modified to read as follows:

"These guidelines are intended for chicken meats and are applicable throughout the food chain from primary production through consumption. These guidelines highlight key control measures that influence the frequency & extend of contamination of chicken meat with Campylobacter and Salmonella Spp."

JAPAN

The Government of Japan is pleased to submit the following comments on the proposed draft guidelines for control of *Campylobacter* and *Salmonella* spp. in chicken meat for consideration at the forthcoming 41st Session of the Codex Committee on Food Hygiene.

Sections 9.4.2, 9.5.2, 9.6.1, 9.8.2, 9.9.1, 9.11.2, 9.12.1, 10.4.2 and 10.6.2

Japan proposes to replace the current title "measures on hazard controls" with "information on hazard controls" for accuracy. These sections provide information on hazard controls for use by member countries, but do not indicate required measures for application.

Consequently last sentences of paragraphs 13 and 14 and the whole text of paragraph 15 should be deleted as they are not necessary. Some amendments in paragraphs 13 and 14 should be made as follows:

> 13. The guidelines systematically present information on available control measures in three categories: ..... ~~Government and industry can use controls in the latter two categories to inform decisions on critical control points (CCPs) when applying HACCP principles to a particular food process.~~
>
> 14. Provision of flexibility in application of the Guidelines is an important attribute. Governments can adapt the guidelines in their legislation where necessary and appropriate, taking into account the information provided in relevant sections. . ~~They are primarily intended for use by government risk managers and industry in the design and implementation of food control systems.~~

Japan seeks for clarification on how to update the information in these sections. In fact, Japan wonders if there is any benefit in having the information in the Codex document while JEMRA provides the same information on the web-based risk management decision support tools, which should be constructed in response to the request made by the last session of the CCFH (see CRD 24 and para. 82 of ALINORM 09/32/13). The guidelines should simply provide a URL of the web-based risk management decision support tools to be maintained by JEMRA in future.

7.2 Availability of control measures

Regarding the Table, Japan seeks for clarification as to whether there is no need to develop required control measure for each step in which neither a tick nor the reference to OIE appears.

9.4.1.2 Defeathering

Paragraph 59

In the 6th dash point, the term "inspection" should be inserted as follows:

> - Regular inspection and replacement of plucker fingers

The following two dash points should be added to provide additional measures for minimizing cross contamination at defeathering:

> - Avoiding further processing of carcases with exceeding level of unremoved feather
>
> - Minimising lesions/damages of carcases by equipment

9.7.1 Measures based on GHP

Paragraph 69 should be amended as follows:

> Line speeds and the amount of light should be appropriate ……

13.1 Monitoring

For accuracy, the following changes should be made in paragraph 134 and the text should be merged with paragraph 137, as follows:

> 134. ~~Information on the level of control of~~ Data collected in the monitoring on the level of *Campylobacter* and *Salmonella* at appropriate points in the food chain should be obtained ~~can be used to~~ for ~~several~~ the purposes ~~e.g.~~ to validate and/or verify outcomes of food control measures, to monitor compliance with hazard-based and risk-based regulatory goals, and to help prioritise regulatory efforts to reduce foodborne illness. Systematic review of data obtained through the monitoring ~~information~~ allows the competent authority and relevant stakeholders to make decisions in terms of the overall effectiveness of the food control systems and make improvements where necessary. ~~137.~~ The type of data collected in monitoring systems should be appropriate for the outcomes sought.

KENYA

4. Definitions

We would like to comment on the definitions mentioned below

1. Batch-- *A subset of a flock. A group of chickens sent together ~~on a vehicle to~~ for processing.*

We propose to strike off the word "on a vehicle" to widen the mode of transport.

2.Partial depopulation-- ***~~partial~~ "incomplete"*** harvest of chickens from a growing flock

We propose to delete the word "partial" and insert the word "incomplete".

3.We also propose that the word "On-line Reprocessing" in process flow diagram 1 be included under the definition clause and defined:

On-line Reprocessing – needs to be defined (in process flow diagram 1)

8.7.1 Measures based on GHP

For *Salmonella*

We propose to delete the word **"**should**"** for clarification purposes.(editorial)

34. Where the use of eggs from flocks that are known to be contaminated is unavoidable, they should be kept separate and hatched separately from eggs from other flocks. Trace back of infection to the contaminated breeding flocks should be performed and control measures ~~should be~~ reviewed.

9.1.1 Measures based on GHP

For *Salmonella*

We have noted that to harmonize the last day of the week it better to use the word "**working cycle"** to suit every country.

47. If flocks that are positive for Salmonella are presented for slaughter this should be done in a manner that minimises cross contamination to other flocks, e.g. by slaughtering them at the end of the day, or all on one day and preferably the last day(s) of the **working cycle** ~~week~~

9.4.1 Measures based on GHP

We would propose to add the word "**approved by competent authority**" to the fourth bullet since the propose statement is a little ambiguous and most industries will take the advantage of the word "other" physical methods

53. So as to minimise contamination of carcasses, control measures may include:

. • Washing with abundant potable water

. • Trimming

. • Use of approved chemical decontaminants approved by the competent authority

. • Use of other physical methods ***approved by competent authority.***

9.4.2 Measures based on hazard control

For *Salmonella*

Comment para 63

We support the statement the way it is at 20-50ppm and take into consideration the amount of chlorine used in water tends to be lower than the amount used for sanitizing the equipments. The chlorine that is used to sanitize the equipment is **between 0.3 -0.5% which comes to 30-50ppm**.

63. Spray applications of 20-50 ppm chlorinated water following defeathering and carcass evisceration have been shown to reduce the prevalence of *Salmonella*-positive broiler carcasses by 22 and 20% respectively.

MEXICO

General comments:

- Mexico suggests that in the body of the document where the text states "it has been demonstrated," a footnote be provided with the respective bibliographical reference.

States	**Should Say**
Page 11 steps 25. Transport 26. Wholesale 28. Retail or food service, 29. Transport	We suggest emphasizing that there should be control either for *salmonella* or *campylobacter* at these steps.
Page 14 points 35. The ~~driver~~ should not enter any livestock buildings. 36. The ~~driver~~ should take measures to avoid cross contamination of day old chicks during loading and unloading.	We suggest replacing the term ***driver*** with ***transport personnel***.
Page 13 footnote [30] It has been demonstrated that only one *Salmonella*-contaminated egg can contaminate all eggs and newly hatched chicks within a hatching cabinet.	The following phrasing is suggested "It has been demonstrated that flies **are** *Campylobacter* and *Salmonella* vectors in broiler chickens and in some conditions, the use of **clean** mosquito nets (screens) can be a good control measure.
Point 9.6.1 ~~Measures based on hazard control~~	We suggest "Measures based on hazard control." [Note: this must be a reference to the Spanish translation. The English version already reads this way.]
Point 9.8.1 Chicken meat should be chilled, using air or immersion chilling, as quickly as possible to limit the growth of micro-organisms on the carcass.	We recommend the following phrasing "Chicken meat should be chilled, using air or immersion chilling, as quickly as possible **in accordance with the health legislation of each country**, to limit the growth of micro-organisms on the carcass."
Point 13.1 ~~Monitoring~~	In the Spanish version the word Monitoring was translated as *Monitoreo*. We suggest the translation be ***Seguimiento***,

PHILIPPINES

The Philippines supports the advancement of the draft guidelines to step 4 as well as the further development of the web-based decision tool undertaken by FAO/WHO and JEMRA.

THE WORLD ORGANISATION FOR ANIMAL HEALTH (OIE)

The World Organisation for Animal Health (OIE) welcomes the opportunity to participate in the work of the CCFH and contribute to the development of the Proposed Draft Guidelines for Control of *Campylobacter* and *Salmonella* spp. in Chicken Meat.

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General comments:

The OIE is very supportive of the approach taken in the draft Guidelines, not to repeat control measures based on GHP that are already presented in the more generic texts of the CCFH, CCMH and the OIE but rather make reference to these texts where appropriate.

Specific comments:

Proposed text change:

The OIE proposes that the OIE be added in all boxes under GHP-based Measures for *Salmonella* for points 1 to 11.

Rationale:

The OIE *Terrestrial Animal Health Code* standards include GHP control measures for *Salmonella* relevant to the Process Steps from 1 through to 11. Therefore, the OIE proposes that the OIE be added to the boxes for 1. Grand Parent Flocks; 2. Transport to Hatchery; 3. Parent Hatchery; 6. Transport to Hatchery; 7. Hatchery and 9. Manage Chicks.

Availability of Control Measures at Specific Steps in the Process Flow

Process Step	GHP-based Measures		Hazard-based Control Measures	
	Campylobacter	***Salmonella***	***Campylobacter***	***Salmonella***
1. Grand Parent Flocks ↓		OIE & ✓		
2. Transport to Hatchery ↓		OIE &✓		
3. Parent Hatchery ↓		OIE &✓		
4. Transport to Parent Farms ↓		OIE		
5. Manage Parents ↓		OIE		
6. Transport to Hatchery ↓		OIE &✓		
7. Hatchery ↓		OIE &✓		

Process Step	GHP-based Measures		Hazard-based Control Measures	
8. DOC to Grower Sheds ↓		OIE		
9. Manage Chickens ↓		OIE &✓		
10. Depopulate ↓		OIE		
11. Transport to Slaughterhouse ↓	✓	OIE		