European Community comments on

Agenda Item 5

Codex Committee on Food Hygiene (37th Session)


(CX/FH 05/37/5)

Mixed competence

Member States vote

The Member States of the European Community (MSEC) would like to thank Germany and its drafting partners for developing the *proposed draft guidelines on the application of general principles of food hygiene to the [control] of Listeria monocytogenes in ready-to-eat foods.*

The MSEC would like to submit the following comments:

**General comment**

The document fulfils the mandate given to the drafting group during the 36th session of CCFH. While the body of the document and Annex I have been refined, Annex II is new and it is not clear what purpose it serves in relation to the rest of the document. Annex II contains important details that would need further consideration.

Relevant information in Annex II concerning specifically *Listeria monocytogenes* could be maintained in Annex II or alternatively they may be transferred to the main document (point 5.2.3 Microbiological and other specifications). Furthermore, consideration could be given to incorporating elements of Annex II relevant for various microbiological risks into the proposed draft principles and guidelines for the conduct of microbiological risk management (CX/FH 05/37/6) developed by France and its drafting partners or to developing Annex II as a separate document setting out a generic approach to deriving microbiological limits and sampling plans etc, for general application.

**Specific comments**

**Title**

Following the suggestion already made by CCFH-36, the square brackets surrounding the word “control” should be deleted.
Introduction

The introductory part is rather long and could be shortened by a reference to the FAO/WHO expert consultations of 2000 and 2001.

The MSEC are of the opinion that in addition to the five key factors listed (5 bullet points in the middle of the introduction, page 5 of the EN version), the two additional factors could be added:
- “use foreseen by the final consumer of the food
- type and size of packaging used for presentation”

Section II – Scope

In its present form the document is voluminous. This depends on the internal structure. The structure of the document is essential for the future elaboration of guidelines for the control of food pathogens.

Throughout the text 36 references are given to the Recommended International Code of Practice - General Principles of Food Hygiene. All these references could be omitted by a short paragraph in the scope along the following lines:

“The General Principles of Food Hygiene (CAC/RCP 1-1969, Rev.3, 1997) lay a firm foundation for ensuring food hygiene along the food chain from primary production to consumer awareness and training. This document should be consulted for essential and general information regarding control of Listeria monocytogenes in ready-to-eat foods. These guidelines focus on specific characteristics related to Listeria monocytogenes in the food chain.”

Section V – Control of Operation

5.2.1 Time and temperature control

The responsibility of the food business operators to carry out appropriate studies to assess the growth of Listeria monocytogenes in ready-to-eat foods up to the end of shelf-life, which support the growth of this micro-organism, should be stressed in the text.

The origin of the specific temperature limits/recommendations in this section and elsewhere in the draft guidelines should be clearly referenced.

5.2.3 Microbiological and other specifications

It is important to complete this part, drawing from Annex II. Such paragraph should indicate in particular the circumstance in which testing of food is recommended.

5.9 Monitoring of effectiveness of control measures from Listeria monocytogenes

Although environmental monitoring is very important, we believe that the combination including both monitoring of environment and foodstuffs would be most effective in certain cases. Therefore, a cross reference to part 5.2.3 could be added.
ANNEX I: Recommendations for an environmental monitoring program for *Listeria monocytogenes* in processing area

Annex I focuses only on monitoring of *Listeria monocytogenes* in the environment. The EC considers that for environmental monitoring the option to use *Listeria* species as indicator organisms should also be developed in the text.

ANNEX II: Deriving microbiological limits and sampling plans in microbiological criteria from food safety objectives

The MSEC acknowledge the interest of this example of microbiological risk management.

The introduction part is relatively clear, but highly technical.

A further concern is how FSOs, POs and possible microbiological criteria related to them can be applied to international trade.

As regards the examples, considering the focus of these draft guidelines to control *Listeria monocytogenes*, it is suggested to further refine them in a practical way, e.g. giving alternatives like reduction of shelf-life, reduction of temperature... Furthermore, it is clearly stated in connection of pasteurized milk that it is not feasible to set a microbiological criterion, but no conclusion is drawn on the means to meet the FSO. As regards cold smoked fish and pre-cut leafy vegetable the conclusion is unclear.

The MSEC are of the opinion that within Table 1 of Annex II, “Eggs for human consumption (shell contamination)” currently listed under III b (sixth indent), should be moved to section IV of Table 1 (Foods not ready to eat...).