CODEX ALIMENTARIUS COMMISSION

E

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.net

Agenda Item 8 **CX/FH 10/42/8**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Forty-second Session

Kampala, Uganda, 29 November - 3 December 2010

CCFH WORK PRIORITIES

(PROPOSALS FOR NEW WORK AND/OR REVISION OF EXISTING STANDARDS)

Prepared by Finland

Background

1. The 41st Session of the Codex Committee on Food Hygiene (CCFH) considered the Report of the Working Group for Establishment of CCFH Work Priorities (for details see ALINORM 10/41/13, paras 125 - 138).

2. Amongst others, the Committee agreed to re-establish the Working Group for Establishment of CCFH Work Priorities under chairmanship of Finland which will consider proposals for new work to be submitted in reply to CL 2010/12-FH. This working group will meet the day before the 42nd Session of the Committee (November 28, 2010).

3. CL 2010/12-FH was sent out to all Members and Interested International Organisations in May 2010. In it, Member Governments were invited to propose new work for consideration by the above working group and were asked to do so by 31 July 2010 in accordance with the Criteria for the Establishment of Work Priorities (see Codex Alimentarius Commission, Procedural Manual, 19th Edition) and in accordance with the process described in Appendix V of ALINORM 07/30/13.

Based on the above:

4. In response to the abovementioned Circular Letter, one proposal for new work was received:

"Guidelines for control of specific zoonotic parasites in meat: **Trichinella spiralis** ***and*** **Cysticercus bovis"**[1]

5. The proposal, prepared by the European Union and New Zealand, for new work in the area of meat hygiene under the umbrella of the CCFH represents a continuation of standards development for priority zoonoses that may be transmitted by meat and meat products. With the adjournment of the Codex Committee on Meat Hygiene (CCMH) in 2006 following completion of the new "Code of Hygienic Practice for Meat", progressing priority new work under the umbrella of CCFH would reflect an efficient and flexible approach to meeting needs of Member countries. The proposal was brought to the attention of the 64th Session of the Codex Executive Committee (CCEXEC) in June 2010 (see paragraph 178 of ALINORM10/33/3A).

6. The purpose of the proposed new work is to provide risk-based guidance on the control of high-priority biological hazards in meat. It is envisaged that initial work would be on control measures for *Trichinella spiralis* in pigs, together with parallel work on *Cysticercus bovis* in cattle.

[1] Project document is attached as Appendix I

7. The scope of the proposed new work would include the following:

- Identification of specific control measures that may be applied
- Application of a farm-to-plate approach in identifying and evaluating risk management options
- Provision of quantitative guidance on testing / control regimes (depending on the prevalence in a specific country, region or farming system) to be applied in order to ensure consumer protection.
- Reference to the current OIE standards, and avoiding duplication of relevant components.

Recommendation:

- To consider whether it is appropriate for CCFH to undertake work related to meat hygiene.
- Establish as a priority for the development of proposals for new work by the CCFH.
- In respect of "Scope of work and establishment of priorities between the various sections of the work", CCFH should discuss whether to progress the work on *T. spiralis* ahead of that on *C. bovis*, or develop both sets of guidance in parallel (as has been the case with "Draft Guidelines for the Control of *Salmonella* and *Campylobacter* in Chicken Meat").
- In respect to the location of any guidelines possibly prepared as a result of this proposal for new work, CCFH should discuss varying options for locating the guidelines:

a) As an Appendix to the Code of Hygienic Practice for Meat (CAC/RCP 58-2005), with a view to further Appendices for other priority hazards over time

b) As a risk-based guideline for a specific hazard / food product combination.

APPENDIX I

Project document for new work on "Guidelines for control of specific zoonotic parasites in meat: *Trichinella spiralis* and *Cysticercus bovis*"

(Prepared by the European Union and New Zealand)

A proposal for new work in the area of meat hygiene under the umbrella of the CCFH represents a continuation of standards development for priority zoonoses that may be transmitted by meat and meat products[2]. With the adjournment of the Codex Committee on Meat Hygiene (CCMH) in 2006 following completion of the new "Code of Hygienic Practice for Meat", progressing priority new work under the umbrella of CCFH would reflect an efficient and flexible approach to meeting Member country's needs. If required, New Zealand (as chair of CCMH) would be very willing to organise and provide technical assistance to an intersession working group.

This proposal has already been discussed and noted by the 64th Session of the Codex Executive Committee (CCEXEC) in June 2010 (see paragraph 178 of ALINORM 10/33/3A).

1. Purpose and scope of the new work

The purpose of the proposed new work is to provide risk-based guidance on control of priority biological hazards in meat. It is envisaged that initial work would be on control measures for *Trichinella spiralis* in pigs, together with parallel work on *Cysticercus bovis* in cattle.

The scope of the proposed new work would include:

- Identification of specific control measures that may be applied
- Application of a farm-to-plate approach in identifying and evaluating risk management options
- Provision of quantitative guidance on testing / control regimes (depending on different prevalence's in country, region or farming system) to be applied in order to ensure consumer protection.
- Reference to current OIE standards, and avoiding duplication of relevant components.

2. Relevance and timeliness

With the rapid uptake of risk-based approaches to food hygiene by national governments and the subsequent re-evaluation of their food control systems, problems in trade can arise from inadequate knowledge of the value of specific measures in reducing public health risks. This is particularly important in the case of meat hygiene.

A risk-based approach to meat hygiene requires re-evaluation of traditional practices and re-focusing of regulatory and industry resources proportionate to risks. While this approach is now strongly advocated by national governments and the recently adopted Codex Code of Hygienic Practice for Meat presents a detailed framework for implementation, there has been very uneven uptake on a global basis. As a consequence the import requirements for meat and meat products of most countries represent an unbalanced and inconsistent mix of "new" (risk-based) and traditional procedures and tests.

At the final session of the CCMH before adjourning *sine die* in 2005, the Committee discussed the need for Appendices providing guidance on risk-based control measures for specified hazards. CCMH was highly supportive in principle but considered that the guidance in the new code of practice needed time to bed in before more specific work was undertaken.

As governments modernise their meat hygiene systems, it is evident that in the national situation, some traditional control measures for meat and meat products in trade as now applied can be singularly inappropriate in terms of proportionality to risk. Routine slaughterhouse testing of pig meat for *Trichinella* and intensive post mortem inspection for *Cysticercus bovis* are two such examples. These two cases provide strongly contrasting examples for application of risk analysis principles to different types of traditional meat hygiene procedures.

The need for risk-based guidance from Codex for these biological hazards is a global issue. These parasites exist at some level in the large majority of countries throughout the world and traditional control measures are a fixture of the

---

[2] Other work currently being undertaken is "Draft Guidelines for the Control of *Salmonella* and *Campylobacter* in Chicken Meat"

import requirements of most countries. In the absence of a Codex standard that facilitates application of risk-based control measures at the national level, trade problems and wasting of food control resources will continue to occur at a significant level. In addition, outcomes in terms of risk reduction are highly questionable in many trade situations.

The guidelines would provide a consistent and transparent technical base for establishing national control measures and this should satisfy judgement of equivalence by importing countries where such measures differ from their own.

The proposed work could lead on to further risk-based evaluation of other priority meat-borne hazards that are causing problems in trade.

3. Main aspects to be covered

The proposed guidelines would be based on Codex principles for food safety risk analysis and provide both qualitative and quantitative advice for implementation of specific control measures at the national level. Depending on the decision of the Committee, the work on *T. spiralis* could precede that on *C. bovis*, or both sets of guidance could be developed in parallel.

The preamble to the guidelines would describe the nature and epidemiology of the hazards, drawing heavily on cross-referencing to OIE texts so as to not duplicate existing material.

Similarly, a description of good hygienic practice at farm level would rely heavily on existing OIE texts.

Risk analysis principles governing the identification, selection, validation, verification and monitoring of control measures would be presented.

The format of the body of the guideline would be similar to that utilised in the "Draft guidelines for the Control of *Salmonella* and *Campylobacter* in Chicken Meat" now in the CCFH step process i.e. a process flow approach that identifies possible control measures at different steps in the food chain. However, the guideline would be much more simple than that referred to above because of the very limited number of specific control measures available[3]. Specific control measures for *T. spiralis* other than on-farm GHP and feedback loops if a positive animal / positive line is detected are essentially limited to laboratory testing (and cooking). Specific control measures for *C. bovis* other than on-farm GHP and feedback loops if a positive animal / positive line is detected are essentially limited to post mortem inspection and further (Company) inspection during boning.

Provision of quantitative guidance would be based on levels of detection of infected animals that is afforded by implementation of specific control measures. This guidance would include calculations of residual non-detection rates where there are different prevalence's in a country, region or farming system e.g. comparing outcomes where prevalence of infection is medium, low, or negligible. In the case of *C. bovis*, outcomes would be compared using different intensities of post mortem inspection.

It is not envisaged that the Codex standard would apply a risk assessment model to determine actual levels of consumer protection afforded in different exposure scenarios. However, a qualitative narrative would be provided, drawing on outcomes from risk assessment models that have been developed by some countries.

A description of recommended on-farm responses when infected animals are detected, proportionate to likely risks to consumers in different detection scenarios, would be a key part of the guidelines.

CCFH could proceed on the basis of the content of the draft guidelines to set a risk-based standard for *T. spiralis* and/or *C. bovis* for meat and meat products in trade. OIE have set such a standard for BSE. And there are precedents in other CCFH work e.g. *Cronobacter sakazakii* in infant formula.

4. Assessment against the criteria for the establishment of work priorities

4.1. General criterion

The proposed work is clearly focused on meat-borne hazards to human health that commonly exist throughout the world, albeit at very different prevalences in different countries. In the case of *C.bovis*, suitability of product is also an issue.

In terms of fair practices in trade, undifferentiated application of traditional meat hygiene controls without a consideration of the equivalence of different approaches in different countries is a significant problem in trade. As well as wasting scarce food control resources in some situations, product wastage and undue cross-contamination consequential to traditional approaches can cause further inequities.

---

[3] Noting that control measures based on GHP will largely be dealt with by reference to OIE texts

4.2. Criteria applicable to general subjects

In respect of "Diversification of national legislations and apparent resultant or potential impediments to international trade", it is highly apparent from review of importing country requirements that considerable differences currently exist. Notwithstanding this, many countries now have risk analysis principles embedded in their national legislation and are committed to application of the principle of equivalence as stated in the WTO SPS Agreement. Availability of Codex guidelines would greatly assist a flexible approach to import requirements based on the proportionality of risk.

The guidelines would also significantly contribute to judging the equivalence of different control measures by importing countries where measures applied by exporting countries differ from their own.

In respect of "Scope of work and establishment of priorities between the various sections of the work", CCFH could decide to progress the work on *T. spiralis* ahead of that on *C. bovis*, or develop both sets of guidance in parallel (as has been the case with "Draft Guidelines for the Control of *Salmonella* and *Campylobacter* in Chicken Meat".

In respect of "Work already undertaken by other international organisations in this field and/or suggested by the relevant international intergovernmental bodies", OIE texts provide extensive general information but do not progress to risk-based guidance in a manner that would reduce current problems in international trade.

5. Relevance to Codex strategic goals

5.1. Goal 1: Promoting sound regulatory frameworks

The proposed work is a direct reflection of Codex strategic goals and recent national legislative frameworks in that standards for food in international trade should be based on science and risk assessment to the greatest extent practicable.

A Codex guideline of the nature intended would provide a strong reference point for harmonising national regulatory requirements on a global basis.

Further, Codex advocates validation, verification and monitoring of food control measures to assure risk-based performance and these aspects would be a feature of the proposed guidelines.

5.2. Goal 2: Promoting widest and consistent application of scientific principles and risk analysis

The food safety risk analysis principles and the farm-to-plate approach advocated by the Codex will provide the core structure for development of the guidelines. Quantitative aspects of the guideline will reflect the Codex principle that application of control measures should be proportional to risk.

5.3. Goal 3: Strengthening Codex work management capabilities

With the adjournment of the CCMH in 2006 following completion of the new "Code of Hygienic Practice for Meat", progressing priority new work under the umbrella of CCFH would reflect an efficient and flexible approach to meeting Member country's needs. If required, New Zealand (as chair of CCMH) would be very willing to organise and provide technical assistance to an intersession working group.

5.4. Goal 4: Promoting maximum and effective participation of members

The proposed work would promote Codex objectives in this area.

6. Information on the relation between the proposal and other existing documents

The proposed work relates to a number of "horizontal" Codex texts as referred to above and the intent of these horizontal texts would be fully realised in guidelines that are developed.

7. Identification of any requirement for and availability of expert scientific advice

Expert scientific advice needed for development of the quantitative guidance embedded in the proposed work would be provided via intersession working group processes. It is envisaged that this guidance would be limited to calculation of non-detection rates for infected animals in different exposure scenarios. It could lead to a quantitative Codex standard being set if that was decided by CCFH.

8. Identification of any need for technical input to the standard from external bodies so that this can be planned for

While JEMRA provides risk assessment advice and peer review for microbiological hazards in foods, there has been no call on JEMRA expertise to date for risk assessment of other biological hazards such as parasites. Irrespective of this, the principles of risk assessment are similar for all types of biological hazards (and in fact are more readily applied to parasites that do not multiply in the food). Consequently, JEMRA could be called on to provide scientific advice or peer review.

9. Proposed timeline for completion of the new work

November 2010: Endorsement of new work proposal by CCFH

May 2011: First physical working group to prepare draft guidelines

July 2011: Approval of new work by CAC

November 2011: Consideration of proposed draft guidelines by CCFH,

May 2012: Electronic working group to further development guidelines

November 2012: Consideration of proposed draft guidelines by CCFH, and advancement to Step 8

July 2013: Adoption by CAC

If this new work proceeds, options for locating the guidelines once adopted by the Codex Alimentarius Commission (CAC) are:

- As an Appendix to the CCMH Code of Hygienic Practice for Meat, with a view to further Appendices for other priority hazards over time
- As a CCFH risk-based guideline for a specific hazard / food product combination.