

IACFO

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International Association of
Consumer Food Organizations

Association Internationale
des Organisations de
Consommateurs de Produits
Alimentaires

Asociación Internacional
de Organizaciones de
Alimentos Para el
Consumidor

食品國際消費者機構

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Positions from the International Association of Consumer Food Organizations for the 42nd Session of CCFH

The International Association of Consumer Food Organizations (IACFO) is an association of a dozen national non-governmental organizations serving consumer interests in the areas of nutrition, food safety and related food policy matters. IACFO members work on food policy concerns unique to diverse populations and regions, including India, Uganda, Malaysia, Japan, and others.

We thank the members of the Working Group for their consideration of issues involved with the control of *Campylobacter* and *Salmonella* spp in poultry meat in preparation of the proposed text. The resulting document incorporates many different views. This comment reflects the views of consumers with regard to the proposed Agenda items, and includes suggestions that would strengthen public health protections in the document.

AGENDA ITEM 4: PROPOSED DRAFT GUIDELINES FOR CONTROL OF *CAMPYLOBACTER* AND *SALMONELLA* SPP. IN CHICKEN MEAT (AT STEP 3)

In order to prevent *Campylobacter* and/or *Salmonella* outbreaks resulting from improperly produced and/or mishandled chicken meat, IACFO urges the Committee to adopt the following changes that will better ensure effective utilization of the guidelines.

Note that recommended language is *italicized*, and language from the Draft Guidelines as currently written remains un-italicized.

9.11.1 GHP-based control measures

Proper storage of chicken meat, along with handling and cooking, is critical in limiting the growth of *Campylobacter* and/or *Salmonella*. Because clear labeling can alert consumers to the risks of raw or undercooked poultry, IACFO recommends amending paragraph 91 as follows:

Pre-packed chicken products intended to be cooked by the consumer should be labeled with safe handling, cooking, *and storage* instructions as appropriate to the National situation.

12.4.2 Regulatory Systems and 12.5.2 Regulatory Systems

In order to eliminate confusion, IACFO recommends merging 12.4.2 and 12.5.2 into one.

12.5.1 Industry

IACFO recommends the following addition to paragraph 141:

Verification frequency should vary according to operational aspects of process control, the historical performance of the establishment and the results of the verification itself. The frequency of verification should be sufficient to confirm that the control measures are working effectively.

Further, IACFO advocates several additional paragraphs in 12.5.1:

Industry should establish documentation concerning all verification procedures and records.

and

Failure of a process control system may require recall as appropriate to the national condition. Industry should have effective procedures to identify implicated product and enable market withdrawal.

and

Recalled products should be held under supervision until they are destroyed, treated to ensure their safety, or used for purposes other than human consumption.

AGENDA ITEM 5: PROPOSED DRAFT GUIDELINES ON THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF VIRUSES IN FOOD

Viruses are an important contributor to foodborne illness outbreaks, and IACFO supports the efforts to develop these proposed guidelines. The following suggestions would enhance their public health protections.

Paragraph 5.6 Management Supervision

IACFO recommends the addition of the following sentence to strengthen this paragraph:

Regular observation of employee hand washing prior to entry into food handling areas should be practiced.

Section IX Product Information and Consumer Awareness

IACFO supports the recommendation that countries give consideration to labeling so consumers can make informed choices whether to consume certain ready-to-eat foods, given the high risk associated with viruses in these products.

Paragraph 10.1 Awareness and Responsibilities

IACFO recommends the addition of the following sentence to strengthen this paragraph:

Monitoring includes regular observation of employee hand washing prior to entry into food handling areas.

In Annex 1 Control of Hepatitis A Virus (HAV) and Norovirus (NoV) in Bivalve Molluscs

IACFO recommends the following changes to provide great consumer protection:

Section III – Primary Production, 2nd sentence from the end (proposed change in *italics*)

When there has been a shellfish-borne outbreak caused by an identified pathogen such as NoV or HAV and the area has been closed, viral testing of the bivalve molluscs *or an equivalent approach to ensure safety should* be used as part of the process of reopening the affected harvesting area . . .

Paragraph 5.1.3 first sentence (proposed change in *italics*)

When there has been a shellfish-borne outbreak caused by an identified pathogen such as NoV or HAV and the area has been closed, viral testing of the bivalve molluscs *or an equivalent approach to ensure safety should* be used as part of the process of reopening the affected harvesting area . . .

Section 5.8 Recall procedures, second paragraph (proposed change in *italics*)

In addition, based on the determined level of risk associated with the presence of NoV and HAV in a given food product, *product recall or an equivalent approach to ensure safety should be taken to remove* the contaminated product from the market. The need for product warnings should be considered.

Annex II Control of Hepatitis A Virus (HAV) and Norovirus (NoV) in Fresh Produce

Section 5.8 Recall procedures, second paragraph (proposed change in *italics*)

In addition, based on the determined level of risk associated with the presence of NoV and HAV in a given food product, *product recall or an equivalent approach to ensure safety should be taken to remove* the contaminated product from the market. The need for product warnings should be considered.