

Brussels, 26th August 2010

RE: UECBV Statement on CONTROL OF CARCASS CONTAMINATION

How can we take the fight for food safety to the next level?

Background

The EU Food Law and the Hygiene package give a very good framework to FBOs to produce food with a very high level of food safety. Despite improvements by breeders, slaughterhouses, cutting-processing plants and related operators fully involved in proper implementation of the EU legislation, raw animal carcasses might accidentally still be contaminated with bacteria which could include pathogens.

European slaughterhouses have significantly reduced the risk of contamination, but there are still considerable challenges in the fight against low dose pathogens like VTEC/STEC. Based on experience, there is not much more the industry can do within the framework of current regulations to go further to eliminate any pathogen contamination of carcasses. The good reputation of any business is extremely important, no more so than in the food sector.

Food safety is a prime condition for food quality and an absolute, non-negotiable must. As EU legislation evolves towards a broader zero tolerance policy¹, new proficient tools are needed for the future.

For better control of salmonella and other microbial contamination risks, measures additional to compliance with Good Hygiene Practices and HACCP principles should be concretely evaluated. For operators in the EU, prerequisites for the use of any pathogen reduction treatment are the effective implementation of HACCP-based procedures together with the application of good hygiene practices. Therefore, decontamination tools might be an integrated part of a risk-based approach in meat inspection.

The following reflections have been formulated with the aim to provide the European operators with additional tools to reinforce their responsibility while helping them to enhance food safety and public health protection.

¹ The Commission intends to set down targets for the reduction of Salmonella in broiler and turkey flocks, and in herds of fattening and breeding pigs over the next few years. The reduction of Salmonella in live animals for food production will help to reduce the prevalence of Salmonella in meat. From 2011, fresh poultry meat should not be placed on the market unless there is an absence of salmonella in 25g tested.

Concrete proposals for a risk-based decontamination

Following broad consultation of experts at international level and being aware of the EFSA assessment of the use of certain substances², the UECBV would like to express its strong interest in exploring options which have the potential to reduce bacterial contamination risks in carcasses. The use of organic substances, naturally present in some food of animal origin such as lactic acid and sodium lactate has potential benefits for food safety. These substances are both permitted food additives, E 270 and E 325, and may be used already quantum satis in foods in general according to Directive 95/2/EC. Specifications for purity are laid out in Directive 96/77/EC. No toxic effects are found when using these substances. Besides this, lactic acid is found naturally in the body (e.g. in muscles) and it is already a common component of food.

Treatment of carcasses with lactic acid has been studied for many years. Lactic acid and its sodium, potassium and calcium salts were evaluated by the Scientific Committee on Food and allocated a non specified ADI³ (SCF, 1991).

In May 2006, the [EFSA Panel found](#) that products produced using these substances were of no safety concern provided that the substances used comply with the specifications for food additives. The EFSA Panel noted that the Scientific Panel on Biological Hazards was not able to evaluate the efficiency of these treatments for carcass decontamination because of insufficient information submitted.

The UECBV would like to stress that it would be worthwhile to conduct a review of scientific literature produced since then and to look at the operators' concerns and improved knowledge.

Some conclusions/recommendations

The UECBV would like to emphasize that the surface treatment of meat by steam, water as well as by lactic acid to allow a significant reduction of microbial surface contamination of foods of animal origin is of benefit both for consumers and food business operators (FBOs). For the operators in the EU, prerequisites to the use of any pathogen reduction treatment are good performances on procedures based on the principles of HACCP together with the application of good hygiene practices. The above mentioned treatments are intended as an additional tool to reinforce the food business operators' responsibility while helping them to enhance food safety and public health protection.

In the course of setting EU targets for food safety (e.g. micro-criteria on salmonella), the cost/benefit analysis should take into account proven methodologies; the UECBV strongly recommends a proper evaluation of the use of the aforementioned treatments taking an evidence-based approach before setting targets.

² Link to the EFSA web-page: [click here](#). EFSA has examined several substances used elsewhere in the world to decontaminate poultry carcasses, as requested by the European Commission. This work has focused on four substances - chlorine dioxide, acidified sodium chlorite, trisodium phosphate and peroxyacids.

³ ADI = Acceptable Daily Intake.

The meat industry's aim is to work with the EU regulatory system with the purpose of further promoting scientific evaluation over the individuation and development of concrete interventions to additionally decrease potential risks linked to carcass contamination levels.