“The Hygiene package”
a new approach to food safety

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Summary

• the “hygiene package”
• the three Hygiene Regulations
• implementing rules
• guidance documents
“the hygiene package”

✓ Regulation (EC) No 178/2002 - General food law
✓ Regulation (EC) No 852/2004 - Hygiene of foodstuffs
✓ Regulation (EC) No 854/2004 - Official controls (meat inspection)
“the hygiene package”

✓ Regulation (EC) No 183/2005 - Hygiene of feedstuffs
✓ Implementing Regulations of the hygiene package (4 + 9)
General food law

Regulation (EC) No 178/2002

- general principles (definitions)
- risk analysis
- traceability
- precautionary principle
- RASFF
- EFSA
Regulation (EC) No 852/2004 characteristics

- all food (replaces 93/43/EEC)
- stable to table (integrated approach)
- all stages of production, processing, distribution, exports
- primary responsibility: food business operator
- not: direct sale of primary products to final consumer
Regulation (EC) No 852/2004 “a new approach”

- registration of all food businesses
- hygiene requirements
- HACCP (all 7 principles)
- guides to good practice
- microbiological criteria
- temperature control requirements

Tartu, 18-6-2007
Regulation (EC) No 853/2004 characteristics

- food of animal origin: red and white meat, farmed and wild game, MSM, meat products, live bivalve molluscs, fishery products, raw milk & dairy products, eggs (& products), frogs’ legs, snails, rendered animal fat & greaves, treated stomachs, bladders & intestines, gelatine, collagen

- not: retail (new definition)
Regulation (EC) No 853/2004  
“a new approach”

- (conditional) approval of establishments
- health mark for red meat carcase (by vet.)
- identification mark (by operator)
- (simplified) requirements for slaughterhouses & cutting plants
- emergency slaughter
Regulation (EC) No 854/2004 characteristics

- quantitative assessment of risks determining the ante-mortem and p.m. examination
- food business operator is responsible
- verification by competent authority
- goal more important than the means
Regulation (EC) No 854/2004
“a new approach”

- action if animals are not clean
- food chain information
- risk-based meat inspection
- use of slaughterhouse staff
Commission Regulation (EC) No 2074/2005
food chain information

- gradual implementation
- preferably in advance (24 hours)
- may accompany animals (horses, markets, emergency, a.m. at farm)
- not all information necessary (QA scheme)
feedback to farmer

- observations on live animal (health, welfare, clean animals)
- observations on dead animal
- slaughter findings:
  - lung or joint diseases
  - tail biting
  - injection sites, etc.

form and coding suggested
risk-based meat inspection

fattening pigs (calves, lambs and kids)

- housed under controlled conditions
- in integrated production systems
- since weaning (pigs)
- regular serological and/or microbiological monitoring
risk-based meat inspection

- calves
  - 8 months old
  - officially bovine tuberculosis-free herd
  - always palpation of lymph nodes
requirements for management

- feed
- all-in/all-out
- no outdoor access
- food chain information
- treatment of bedding material
- farm staff/ access procedures
- pest control

GAP
flexibility

• Derogations to facilitate SME’s
• National measures adapting the requirements for:
  ✓ continued use of traditional methods
  ✓ special geographic constraints
  ✓ establishments with low throughput
  ✓ construction, layout, equipment
national measures taken by MS

• small slaughterhouses (AT and SI)
• slaughter on farm (LU)
• reindeer meat (FI and SE)
• raw-dried and raw-smoked meat products (BG)
implementing rules

some examples:

- microbiological criteria
- *Trichinella* testing
Commission Regulation (EC) No 2073/2005
microbiological criteria

Food safety criteria

- defines the acceptability of the product/batch
- applicable to products placed on the market
- action: withdrawal
food safety criteria: *Salmonella*

- minced meat and meat preparations
- from poultry (intended to be cooked)
- absence in 10 g until 1/1/2010
- absence in 25 g thereafter
- n=5, c=0
- sampling once a week
Commission Regulation (EC) No 2073/2005
microbiological criteria

Process hygiene criteria

- indicates the acceptable functioning of the production process
- applicable during the process, not to products placed on the market
- action: improvement of production hygiene, selection of raw materials
process hygiene criteria: *Salmonella*

Carcases of broilers and turkeys

> 15 carcases

10 g of neck skin after chilling

absence in 25 g of pooled sample,

"rolling window" system (7 out of 50 samples can be positive)
flexibility

- operator can choose frequency and method
  - based on risk
  - in the context of HACCP
- fixed frequency of sampling (carcases, etc.)
- once weekly ⇒ fortnightly sampling
- reduced frequency for small establishments
Commission Regulation (EC) No 2075/2005

*Trichinella*

new approach:

- larger sized sample of meat (animals at risk)
- reference method
- not any longer *trichinoscopic* method (except)
- derogations

- freezing (except horse and game meat)
- *Trichinella* free farms (fattening pigs only!)

Tartu, 18-6-2007
Commission Regulation (EC) No 2075/2005

registrations of *Trichinella* free holdings
farmer: husbandry (feed, not outdoors)
pest control (= GAP)
CA: regular farm controls
monitoring program
annual report
contingency plan

but testing of horses, wild boar, breeding pigs, “organic” pigs
flexibility for small slaughterhouses

- discontinuous slaughter
  - p.m. inspection by OA
  - sufficient facilities to detain meat
  - procedure to assess the performance of the OA
  - OV visits once a day
  - a.m. inspection by OV
Guidance documents

Guidance documents:

- Regulation (EC) No 852/2004*
- Regulation (EC) No 853/2004*
- HACCP (2 parts)*
- Import requirements*
- Multi-annual control plans/auditing
- Official controls of microbiological criteria*
- CD-ROM
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additional info:

http://ec.europa.eu/food/food/biosafety/hygienelegislation/index_en.htm
http://europa.eu.int/eur-lex/lex/
www.vetimpleg.eu
http://ec.europa.eu/food/training/index_en.htm
transitional derogation (Art. 8)

- n=5, c=1
- notify Commission and MS
- labelling
  - only for the domestic market
  - to be thoroughly cooked
Commission Regulation (EC) No 2074/2005

- food with traditional characteristics
  - derogation from 852
  - simplified procedure
  - does not apply to traditional methods
Commission Regulation (EC) No 2076/2005
transitional arrangements

- use of clean water
- for heading, gutting, filleting, cutting of fishery products
- on land establishments
- on board vessels