COMMISSION OF THE EUROPEAN COMMUNITIES

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COMMUNICATION FROM THE COMMISSION TO THE COUNCIL

Coordination of the position of the Member States in relation to the 12the session of the Codex

Alimentarius Committee on Processed Meat and Poultry Products (Copenhagen, 2 – 8 October 1982

COMMUNICATION FROM THE COMMISSION TO THE COUNCIL.

Subject: Coordination of the position of the Member States in relation to the 12th session of the Codex Alimentarius Committee on Processed Meat and Poultry Products (Copenhagen, 4 - 8 October 1982).

In relation to the above-mentioned meeting, the joint secretariat of WHO/FAO requests in document CL 1982/7 of February 1982 comments on the proposed Draft Code of Hygienic Practice (1st revision) for Processed Meat and Poultry Products (CX/PMPP 85/5) at step 3 of the Procedure. These comments should be sent to the Chairman of the Codex Committee on Processed Meat and Poultry Products in Copenhagen and to the Chief, Joint FAO/WHO Food Standards Programme in Rome before 31 July 1982.

As by virtue of Directive 77/99/EEC this matter is already subject to Community legislation, Member States should coordinate their reply. The Commission proposes that the Council agrees that:

- the comments set out in the Annex of the present document are sent to the Chairman of the Committee and to the Chief, Joint FAO/WHO Food Standards Programme by the Commission on behalf of the Community,
- the usual on-the-spot coordination will take place if necessary.

Proposed Draft Code of Hygienic Practice (1st Revision) for Processed Meat and Poulty Products to be examined by the 12th session of the Committee of Codex Alimentarius on Processed Meat and Poultry Products.

COMMENTS BY THE EUROPEAN COMMUNITY

After having examined document CX/PMPP 82/5 of the Codex Committee on Processed Meat and Poultry Products, for hygienic considerations, for consistency and clarity of the text, the European Community has the following comments:

1. ad point 2.17.

To avoid confusion in the text later on and for clarity of the text, there should be a clear distinction between "wrapping" and "packaging". Therefore, the following definitions should be included:

- wrapping: the protection of meat products by the use of an initial wrapping or initial container in direct contact with the product concerned as well as the initial wrapper or initial container itself
- packaging: the placing of a wrapped or unwrapped meat product or products in a second container, as well as the container itself.

2. ad point 3.4.9.

- The words "non absorbent" should be replaced by "rot-proof".
- The second sentence of the second indent should be replaced as follows:
 "Up to a height of 2 meter at least, the walls should be smooth....".
- 3. ad point 3.4.12.

 Office accomodation for the meat inspection service should be available.

 Therefore, the brackets have to be deleted.
- 4. ad point 3.5.1.2.

The phrasing of paragraph 28(f) of the Code of Hygienic Practice for Processed Meat Products should be kept.

- 5. ad point 3.5.1.4.

 All water used in premises should be potable. Therefore, this point should be deleted, as it is covered already by point 3.5.1.1.
- 6. ad point 3.5.1.5.

 All water used should be potable. However, in exceptional cases, non patable water may be used. It should be made clear, that non potable water used, in

the case of refrigeration, is used for the cooling of the refrigeration equipment only. Therefore, this point should read as follows:

"Potable water must be used for all purposes including the retorts. However, non potable water may in exceptional cases be used in closed circuit for steem production, fire fighting and the cooling of refrigeration equipment, provided that the pipes installed for this purpose preclude the use of this water for other purposes."

7. ad point 3.5.4.

For hygienic reasons, following considerations are made:

- Hand washing facilities should be equipped with "disposable hand towels" instead of "suitable hygienic means of drying hands".
- "Taps should be of a non-hand operable type" instead of "taps of a non-hand operable type are desirable".

The wording in this point should be adapted as such.

8. ad point 3.6.1.

It should be considered that the use of wood for equipment, implements and utensils is forbidden. Therefore, this paragraph should read as follows:

"Rooms where work on fresh meat and meat products is undertaken must have at least instruments and working equipment such as cutting tables, tables with detachable outting surfaces, containers, conveyor balts and saws, of non-corrodible material, not liable to taint meat and easy to clean and disinfect. The use of wood in particular is forbidden".

9. sd point 4.2.4.

The use of rooms for other purposes than the preparation of food may present hygienic hazards. Therefore our text should read as follows:

"Rooms, instruments and working equipment must be used only for the preparation of meat products. However, they may be used for the preparation of other foodstuff either simultaneously or at different times following authorization by the competent authority, provided that all appropriate measures are taken to prevent contamination or adverse changes in the products covered by this Code of Hygienic Practice.".

10. ad point 5.2.1.

The medical examination should be renewed annually. Therefore, the following text is proposed:

"A medical certificate shall be required from every person working on fresh meat or meat products. It shall attest that there is no impediment to such employment; it shall be renewed annually and each time the competent authority so requests; it shall be kept at the disposal of the latter.".

11. ad points 6.3.2. and 6.3.3.

These points are confusing, since they are covered already under point 3.5. They should therefore be deleted.

12. ad point 6.5.1.

The meaning of this point is not clear. The Community proposes that the first phrase of point 33 of the Code of Hygienic Practice for Processed Meat Products is kept, provided the word "stored" is included, as follows:

"No containers, wooden crates, wooden boxes or cartons should be assembled or stored in any part of an establishment in which meat or meat products are prepared, processed, handled, packed or stored".

Furthermore, an additional paragraph should be added to point 3.6., which reads as follows:

"A room for the storage of cleaning and maintenance tools and products should be provided.".

13. ad point 6.6.2.3.

The draft would be clearer if the text is drafted as follows:

- "Fresh meat and meat products, their ingredients and containers shall not:
- come into direct contact with the ground,
- be deposited or handled under conditions which might conteminate them.

 Care must be taken to ensure that there is no contact between raw materials and finished products.

Fresh meat and meat products shall be stacked in such a way that there is an adequate air circulation.".

- 14. ad point 6.8.1.

 This point is already covered by point 3.4.12. and should therfore be deleted.
- 15. ad point 6.8.2.

 Since laboratory facilities for the purpose of meat inspection are essential, the brackets should be deleted.
- 16. ad point 6.8.4.

 The words in brackets should be deleted.
- 17. ad Annexes A and B under d)

 To be consistent with the rest of the text, littera d) should be deleted, because requirements for potable water are already covered by point 3.5. of document CX/PMPP 82/5.