

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD  
HEALTH  
ORGANIZATION



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Agenda Item 4

CX/MPH 03/4 Add...

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON MEAT AND POULTRY HYGIENE

Ninth Session  
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### INDIA's COMMENTS

#### PROPOSED DRAFT GENERAL CODE OF HYGIENIC PRACTICE FOR FRESH MEAT (at step 3 of the Codex Procedure)

#### 3. Definitions

**Risk base:** In this principle Hazard Analysis Critical Control Points (HACCP) is now accepted as the food control system of choice. An introductory remark to codex guidelines say that the implementation of HACCP should be guided by “scientific evidence of risk to human health”. As regards definitions, generally there should not be any problem except that it has taken up primary production in the ambit of this committee which is **objectionable** and may create problems for us.

#### 5. Primary Production

Under primary production, it is stated that this is a significant source of hazard associated with need and a risk based system of primary production needs to be adopted to remove these hazards. This would mean that whatever bird or animals are slaughtered would have to follow the principles of primary production management and the producers should maintain health and hygiene records of the poultry/animals, records of treatment, records of the feedstuffs, records of the relevant environmental factors and should also include application of HACCP principles. The animal or the bird management practices should follow the traceability system to allow regulatory investigation wherever necessary. This would further imply that the primary producers should record relevant information on the health status of the birds and animals as it relates to the production of meat which is safe and suitable for human consumption and also have records of traceability of feedstuffs, treatment with veterinary drug, details of other pest control, pesticides, their residues and provide monitoring and surveillance system that establishes baseline data and a guide of a risk based approach to control such hazards in meat.

India should take a stand to omit the use of word HACCP in primary production at farm level. We should stress on good hygiene practices(GHP) at the level of primary production and HACCP at the level of processing plant. It is not possible and feasible to develop comprehensive HACCP system for primary production as there are large number of small farmers and farms which runs into hundreds of thousands in India.

## **5.2 Hygiene of slaughtered animals Para 15**

Both farmer and competent authorities should work together and implement science based meat hygiene programme at the level of primary production. Rationale behind this is that meat and hygiene programme should be based on prevention and minimization of hazard including disease conditions affecting hygiene processes.

Similarly, any reference to animal, though, deserve attention of the Government, the issue is outside the scope of the Codex in the present reference and hence be omitted.

## **Para 17**

Animal identification system may be deleted.

## **5.4 Hygiene of Feeding stuffs**

There is a separate Committee/Task Force on code of practice on good animal feeding which has to submit its report by 2004 and issues addressed from para 2.5 to 27 will be discussed by the Task Force. Till the response of the ad-hoc intergovernmental task force on animal feeding is available, this section should be omitted.

## **5.5 Hygiene of the environment**

This is the responsibility of other agencies and this codex Committee does not have the mandate as far as the environmental actors are concerned and this portion can be omitted.

### **5.6.1 Transport of slaughtered animals**

We can take the stand taken that “due consideration should be given to avoid stress on poultry animals” and no issue should be flagged.

## **6.1 Principles of meat hygiene applying to animals presented for slaughter**

This also talks about primary production, risk based analysis during ante-mortem. Here we should not stress on all the information but only relevant information form the primary production and results of ante-mortem inspection to the greatest extent should be utilized in processing operations following GHP.

### **8.3 Design and construction of slaughter areas**

Para 64. May be deleted as this has been discussed at para 71.

### **8.7 Temperature control**

An effective disinfection is the goal of any sanitation process, which should appropriately be achieved. Similarly the storage of chilled and fresh meat at temperature suitable to minimize microbial growth should be mentioned as minimizing microbial growth is the objective of the required temperature.

### **14.1 Principles of training for meat hygiene**

The sub.-sections(iii), (iv) and (v) of this Section should be omitted. Rationale behind this is that the competent authority should verify the establishment which is producing safe and suitable food and need not verify the establishment personnel competent or recognized training programme.

**14.2** Training programme should also be omitted as this section is out of the scope of this document.

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