Opinion 05-2022 of the Scientific Committee established at the FASFC on the draft Royal Decree on the infrastructure, hygiene and traceability of establishments handling food of animal origin and regulating the inspection of slaughtered animals

Background & Terms of reference

The Scientific Committee is requested to assess the draft Royal Decree (RD) on the infrastructure, hygiene and traceability of establishments handling food of animal origin and regulating the inspection of slaughtered animals. The draft Royal Decree is the result of the wish of the FASFC to thoroughly revise all legislation on food hygiene in order to improve consumer protection, simplify legal requirements and update Belgian legislation by reducing the number of Decrees.

In addition, a number of specific questions are asked with regard to the draft Royal Decree.

Method

The assessment of the draft RD was carried out on the basis of expert opinion and available data in the scientific literature.

Conclusions

The Scientific Committee formulated several remarks to improve the draft RD.

In addition, a number of specific questions are answered:

Is the minimum sampling area (at least 100 cm^2 (50 cm^2 for carcasses of small ruminants) per sampling zone) sufficient to provide sufficient guarantees for the detection of pathogenic micro-organisms that may develop during the transport of an incompletely cooled carcass?
For the Scientific Committee this sampling area is sufficient. However, it is only necessary to determine the aerobic germ count. No research into pathogens is required since no significant outgrowth of pathogens is to be expected at 7°C.

The RD of 30 November 2015 provides for sampling over larger areas than the minimum areas laid down in Regulation (EC) No. 2073/2005. Is this justified or does the minimum sampling area provide sufficient guarantee for the detection of pathogenic micro-organisms?
The Scientific Committee is of the opinion that this larger sampling area can be retained. The larger the sampling area, the higher the chance of detecting any pathogens present. However, it should be noted that the sampling location may play an even greater role than the sampling area with regard to the sensitivity of pathogen detection. After all, contamination is highly variable on the same carcass.

The draft RD stipulates that stomachs, intestines and bladders that are not salted or dried can be transported at a temperature higher than 3°C if such transport takes place on the same day as the slaughter of the animals from which they originate. In this case, is it necessary to establish a temperature above which these stomachs, intestines and bladders should not be transported in order to guarantee the safety of the food chain or a maximum time limit for such transport.
The Scientific Committee proposes a number of conditions for the transport of stomachs, intestines and bladders that have not been salted or dried and which are collected at the slaughterhouse before reaching a temperature of 3°C. A similar procedure is proposed as is currently the case for blood that has not been fully cooled.

The draft RD envisages that in slaughterhouses, cutting plants and game handling establishments, microbiological controls of cleaning and disinfection are carried out by the operators. This consists of an aerobic germ count on surface samples. Should the incubations for these analyses be done at 30°C or better at 37°C?
The Committee conducted a literature study on the influence of an incubation at 30°C (for 48-72 hours) versus an incubation at 37°C (for 24 hours) on the aerobic colony count to verify the correct implementation of cleaning and disinfection. The influence of the incubation temperature appears to be relatively limited. In general, incubation at 37°C is carried out for the detection of mesophilic bacteria, to which various pathogens belong. The incubation at 30°C is rather performed for the enumeration of environmental bacteria (mesophiles and psychrotrophs). However, there is a difference in incubation time and shifts in the identified bacterial species are to be expected.

The draft RD considers the sampling and analysis of cut meat from farmed game, as well as the compliance with microbiological criteria. To be able to demonstrate that there is no growth of pathogenic micro-organisms, would it be relevant to extend these requirements to cut meat of wild game or to provide for more appropriate requirements?
Wild game meat is in a similar product to farmed game meat. However, the potential risk is possibly greater because of the possibility of organs being shot during the hunt with a consequent contamination of the carcass and because of the generally longer period between the killing of the animal and the start of refrigeration.
If such sampling and analysis were to be carried out on wild game meat, process hygiene criteria would need to be defined. However, these process hygiene criteria do not yet exist for wild game. Field data on contamination of carcasses and wild game meat in the game handling units should be available first. Process hygiene criteria can then be set based on these data. However, this does not fall within the reference terms of this request for advice.

After the initial request for advice was submitted, another paragraph was added to Article 32 of the draft RD: '§3. Offal from private slaughter in an approved slaughterhouse may be introduced into the commercial circuit provided that it has been approved by the official veterinarian as fit for human consumption'. The Scientific Committee is asked to evaluate this addition.
The Scientific Committee can agree with this addition to the draft RD. It concerns offal that originates from animals that have undergone a veterinary inspection at slaughter and that have been found fit for human consumption.

The full text is available on this website in dutch and in french.