

Reply of the European Union on

CL 2021/35/FH:

Request for comments on the proposed draft Guidelines on the control of STEC in raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts

Mixed Competence European Union Vote

Concerning the questions raised in paragraph 16 of the EWG report:

- a. The European Union and its Member States (EUMS) can accept different formats of the Annexes.
- b. The EUMS can support an suspension of work on the fresh leafy vegetables if JEMRA is willing to provide further input on STEC-specific control measures.

Appendix I

- Concerning paragraph 51, the EUMS prefer “(relevant) food business operators” since the term “stakeholders” is very vague. Monitoring information should be provided in the first place to the relevant food business operators who has the responsibility for the safety of the food and for taking additional measures if needed (e.g. informing the consumer).
- Section 11.2 is not only on laboratory analysis criteria but contains also important information on the consideration of risk management measures related to the presence of certain virulence factors. A large part therefore does not belong to Section 11 but should be moved to a separate section on the relevance of virulence factors in risk management decisions. This section should also address other factors that may influence risk management decisions such as whether or not it is a ready-to-eat food.
- The EUMS propose to merge paragraphs 55 and 59 since they cover the same issue.

Annex I (beef)

- The added value of this Annex is limited and can be largely replaced by a cross-reference to Annex I of the Guidelines for the Control of Non-typhoidal Salmonella spp. in beef or pork meat (CAC/GL 87-2016), in particular as regards GHP-based measures.

Annex II (fresh leafy vegetables)

Q1: The EUMS will explore whether the requested information is available.

Q2: The EUMS support the recommendation of the EWG Co-chairs. As for beef, the added value of this Annex to existing guidelines should be assessed.

Q3: It could be useful to consider if GHPs alone are sufficient to control STEC in fresh leafy vegetables at certain steps. If yes, this must be based on a (included) hazard analysis and may then also be considered for Annexes I and III.

Q4: The EUMS do not oppose a request to JEMRA but is not convinced on the need for it. The EUMS consider that a minimal distance between fields and animal operations is not realistic e.g. on mixed farms. In addition, this is not specific for VTEC control and rather concerns a recommendation in CXC 53-2003 or the upcoming guidelines on the use of water in fresh produce.

Q5: A cross-reference to CXC 53-2003 seems more appropriate.

Q6: The EUMS are of the view that this has been addressed in the (draft) JEMRA report

Q7: The EUMS can support both versions.

Q8: The EUMS prefer “It is recommended that” since it is unclear when such records are not appropriate.

Q9: The EUMS propose to delete this section. The EUMS consider that CXC 53-2003 will need to be revised in any case to ensure alignment when these Guidelines and the one on use and re-use of water have been adopted. Since these recommendations are not STEC specific, it seems more appropriate to consider such paragraph in that revision.

Q10: A flow diagram, including steps at primary production might be relevant. Again it can be considered to put such flow diagram (at least the part on primary production and fresh market post-harvest) in a revision of CXC 53-2003. The flow diagram needs in any case further consideration since a cooling step in the fresh market might not always be needed, while for other fresh produce (e.g. pre-cut ones) such requirement seems also relevant at retail.