27/11/2025

CODEX COMMITTEE ON FOOD HYGIENE
(Fifty-fifth Session)
Nashville, USA
15 – 19 December 2025

European Union Comments on

Agenda item 8

REVISION OF THE GUIDELINES FOR THE CONTROL OF CAMPYLOBACTER AND SALMONELLA IN CHICKEN MEAT (CXG 78-2011)

(CX/FH 25/55/8)
(Reply to CL 2025/61-FH)

Mixed Competence
European Union Vote

In response to the request for comments, the European Union and its Member States (EUMS) would like to thank and congratulate the United States of America, Australia, Brazil, Denmark, Honduras and India for the very useful work undertaken as regards the revision of the Guidelines on for the Control of *Campylobacter* and *Salmonella* in Chicken Meat (CXG 78-2011).

General comments

1. The EUMS regret that the revision was not used to ensure full structural alignment with the General Principles of Food Hygiene. This position may undermine the alignment of other Guidelines as based on the "specific nature of the scope and the preferred format". The proposals for alignment under point 6 of the agenda of CCFH55, clearly illustrate that full alignment might be challenging but is possible. The EUMS would like to discuss at CCFH55 the consequences for alignments of other guidelines.
2. The EUMS understand and agree that the guidelines do not have the intention to set quantitative limits for *Campylobacter* and *Salmonella* in raw chicken meat for international trade (food safety criteria). It is however regrettable that criteria to verify or indicate the acceptability of performances of a process, as recommended in the *Principles and Guidelines for the Establishment and Application of Microbiological Criteria related to Foods* (CXG 21-1997) were hardly considered. Some suggestions were made in the section on monitoring.

3. The EUMS miss a section addressing the need for prudent use of antimicrobials at primary production in view of control of antimicrobial resistance. Such use should be discouraged or even prohibited unless the animals show symptoms of disease.
4. The impact of non-culturable but viable forms of *Campylobacter* and *Salmonella* is completely missing in the text. Many studies point out the effect of chilling, freezing or organic acid applications producing mainly viable but non-culturable (VBNC) forms of *Campylobacter* and *Salmonella*. It should be mentioned in the text that efficacies of these measures might be limited due to VBNC-formation.
5. When hazard control measures are stated, often only *Salmonella* specific or general measures are named. More *Campylobacter* specific measures could be added to the document. Or the other way around: measures that apply to both agents could be mentioned in a general chapter. E.g., p.19 (line 8): "Post-Chill Applications - Post-Chill Applications Hazard-Based Control Measures": A general section or *Campylobacter* specific section is missing and could be implemented. Most of the examples stated in "Specific to *Salmonella*" are relevant for *Campylobacter*, too.
6. By lack of numbering of paragraphs during the drafting phase, it is difficult to make references in specific comments.

Specific comments

- **Section 1, paragraph 1, third sentence:** The EUMS proposes the following change: "The risk in different countries varies according to control measures and practices implemented along the chain from primary production to final preparation of the meat for consumption, **as well as by geographical and climatic factors."** **Rationale:** Variations in the risk of *Campylobacter* infection are also influenced by geographical and climatic factors, such as a seasonal increase in prevalence in northern countries compared with consistently higher prevalence in southern regions.
- **Section 1, paragraph 2, second sentence: "**Organisms of the genus have optimal growth at a pH between 6.5 and 7.5, and at temperatures between 42°C and 43°C (ICMSF 1996)". The EUMS consider that this sentence should be clarified, or, alternatively, it should be added to footnote 2: "**References to *Campylobacter* relate only to thermotolerant spp." Rationale**: Reference to temperatures between 42°C and 43°C is not true for all *Campylobacter* spp. relevant to human health, e.g. *C. fetus* and *C. lanienae*. Range should be 37-42°C to cover all *Campylobacter* spp. of relevance to human health.
- **Section 9, last paragraph before Figure 1:**
  The EUMS would like to propose the following amendment: 'A generic flow diagram is presented …. and should adapt the design of the HACCP plans accordingly **when applied**.' **Rationale:** HACCP plans are not always applied at primary production, a food hygiene system might be sufficient.

- **Section 9.1, General flock management control measures for *Campylobacter* and *Salmonella***
  - i (feed), the EUMS would like to propose the following change: 'Feed should be treated, stored, and delivered in a manner that prevents contamination. Feed should preferably be delivered in dedicated vehicles **or closed receptacles,** used only for feed transport. The effectiveness of these measures can be verified by testing ~~critical control points~~ (e.g., feed, dust from feed silos, storage containers). **Rationale:** closed recipients do not create a risk of contamination. The introduction of CCP at this stage seems disproportionate.
  - j (free-range): the EUMS would like to propose deleting the second paragraph. It could be replaced by a sentence indicating that '**Prevention of *Campylobacter* is unlikely in case of free-range production systems and should be taken into account in further processing steps.' Rationale:** the implementation of the current recommendation is too vague and unrealistic.
- **Section 9.1, Specific flock management control measures for *Salmonella***
  - a. The EUMS propose to delete the second sentence and to amend the first sentence as follows; 'The use of *Salmonella*-infected eggs ~~will increase the likelihood of~~ **will most likely result in** the flock being infected.' **Rationale:** Taking into account the conditions during hatching, the chance of infection is very high. MRA 45 does not recommend the cleaning and sanitation of hatching eggs as contradictory opinions exist on the effect on *Salmonella* control (destruction of cuticula)**.**
  - d. The second sentence seems also relevant for *Campylobacter* infected broiler flocks and should therefore be moved to the common section.
- **Flock Management Hazard-based Control Measures**
  Second bullet: the EUMS propose to add an additional sentence at the end reading '**In particular the vaccination of breeders against vertically transmitted *Salmonella* serovars has been demonstrated to be very efficient**.' **Rationale**: demonstrated by several studies and in practical circumstances.
- **Section 9.3 Slaughter and dressing**
  - The Section on "Slaughter Hazard-based Control measures" seems a repetition of the first bullet in the Section "Depopulation and Transport Hazard-based Control measures" and could be deleted.
  - In the Section "Specific scalding control measures for *Campylobacter* and *Salmonella*", it would be interesting to provide a recommendation on the optimal scalding temperature. **Rationale**: Regarding "Raising the temperature during processing breaks high enough for a long enough time to kill *Campylobacter* and *Salmonella* in the scalders" we consider the text should give an indication of adequate temperature/time combinations to kill pathogens.
- **Section 9.4, Chill carcass, point f, third bullet:** The EUMS propose the following change: " Chlorine in the chill tank may not act as a decontaminating agent directly on the contaminated carcass but ~~by both inactivating Campylobacter and Salmonella~~

~~washed off the carcass into the water, and~~ **instead may inactivate *Campylobacter* and *Salmonella* when these are washed off the carcass into the water,** thereby preventing re-attachment and cross-contamination." **Rationale**: initial sentence somewhat unclear.

- **Section 9.4 Post Evisceration processing: the EUMS propose the introduction of two new paragraphs at the end of section 9.4:**
  - **"Several hazard-based control measures as presented in these guidelines are based on the use of chemical decontaminants to reduce the prevalence and/or concentration of *Campylobacter* and/or *Salmonella* in broiler carcasses. Where chemical decontaminants are considered necessary, the processor should conduct studies to determine the most effective processing step for their use." Rationale:** Guidance is provided on the use of chemical decontaminants at multiple processing steps. They should be used at the step at which they have the greatest effect in reducing the prevalence and/or concentration of *Campylobacter* and/or *Salmonella* in broiler carcasses in an individual slaughterhouse.
  - **"The use of chemical decontaminants should never replace good hygienic practices in slaughter houses and biosecurity measures in the farms of origin." Rationale:** Guidance is provided on the use of chemical decontaminants at multiple processing steps. Multiple applications of chemical decontaminants should not be used to compensate for poor hygiene practices at slaughter and dressing and inadequate biosecurity measures at primary production.
- **Section 9.6:** General retail control measures for *Campylobacte*r and *Salmonella,* point f **:** The EUMS proposed the following change: "Products should be stored at temperatures that prevent the growth of *Campylobacter* and *Salmonella* and in a manner that prevents cross-contamination with other foods and surfaces (~~(-18°C to 5°C~~ **frozen, or chilled at 3-5°C**)" **Rationale:** suggestion including the same refrigeration temperature range as in the storage section: 3-5ºC**.**
- **Section 9.6**, Consumers (Step 6.6), Text box: The EUMS suggest rewriting this sentence because consumers will not follow the time-temperature combinations established by a Competent Authority. **Rationale** Easier and clearer instructions should be provided.
- **Section 12. Monitoring**
  - Section Primary production and processing, first bullet: The EUMS suggest adding at the end: '**Preferably the sampling frequency in breeders should allow to take control measures before progeny chicks are transported from the hatchery.'**
  - Section Primary production and processing, third bullet: The EUMS suggest adding at the end: '**A moving window approach as described in Section 4.9 of CXG 21-1997 can be considered.'**