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CFA secures shelf-life review

CFA has secured an FSA scientific review of the research underpinning the proposed FSA Guidance that would restrict the shelf-life of vacuum packaged/modified atmosphere packaged (MAP) products (foods stored at 5–8°C) to 5 days.

Introduction of a 5-day rule would create exceptional problems with the continued production of all chilled products other than sandwiches and sushi, which have particularly short shelf-lives. CFA has, therefore, sought a scientific review of the issue since there is sound evidence that current measures (the 10 day rule) are effective at assuring the safety of chilled prepared foods.

CFA has been working with researchers and industry specialists and has lobbied the FSA directly, with the British Retail Consortium and through the Food & Drink Federation. We have also presented our arguments to the ACMSF (the Advisory Committee for the Microbiological Safety of Food) who, at their December meeting, agreed with CFA and opposed the introduction of the proposed FSA Guidance, particularly regarding the 5 day element, concluding that a scientific review needs to take place.

The scope of the review is to be determined by the ACMSF but it is anticipated that it will not only review the science but determine the safety margins applicable to various control procedures as well as consider the applicability of the need for controls on all chilled products. This is in line with CFA's approach and we have offered to assist in this work.

Microbiological Criteria Regulations

In June this year, the EC will publish Microbiological Criteria Regulations which will define microbiological safety in the EU from 1 January 2006. The MCR relate to a package of new EU hygiene regulations that are also due to

come into effect on that date, and to the General Food Law (178/2002) Regulation, which came into force on 1 January this year.

Over the past 4 years, CFA has played a key role, both in the UK and internationally, in the development of the MCR, lobbying for the HACCP focus to be maintained and for science-based targets to be set. Whilst this principle seems to have been accepted by the regulators there are still a number of outstanding issues that need to be resolved. For example, the MCR does not require increased product testing where GMP and HACCP are in place and verification is carried out as it is now. However, this needs to be made clear to all parties, particularly enforcement authorities as vague wording could result in different approaches across the EU.

The EC recognises that microbiological testing *per se* is not a control measure and, in itself, does not ensure food safety, whereas the implementation of GMP and HACCP do. Beyond periodic HACCP verification the only time that pathogen testing is required is during validation of a new process or in the case of a new material being used.

In addition, the EC has stated that a company that has implemented GMP and HACCP and supporting systems and is following the shelf-life assessment approach set out in Annex II of the MCR is not expected to carry out *Listeria monocytogenes* (Lm) challenge testing. However, the EC has also proposed Lm levels which are technically unachievable, particularly where uncooked ingredients are used. This approach is contrary to that taken by WHO, Codex, the EC's own Scientific Committee for Food and Scientific Committee for Veterinary Measures, and the UK's ACMSF and Health Protection Agency.

The next few weeks are critical to shaping the final detail of the MCR and CFA will continue to monitor developments and lobby for sound science and common sense.

NEWS

CFA Day at the IFR

CFA members and (Institute of Food Research) IFR research staff attended a CFA day at the Institute of Food Research on 15 February 2005 to learn more about specific research programmes of interest. Topics included chilled food shelf-life; microbiological risk assessment software, predictive models, nutrition, packaging, and produce decontamination research. Speakers included Professor Mike Peck, Dr Gary Barker, Dr Aline Metris, Dr Richard Faulks, and Professor Tim Brocklehurst. The day was a huge success and other CFA days at IFR are planned for the future.

Free CFA publications on website

CFA is publishing many of its publications on its website as free pdf downloads. The aim is to help companies in ensuring food safety by increasing the availability of key CFA information particularly given the increasing emphasis on HACCP in legislation.

Most of the existing documents are to be made available during the coming year, and in future CFA documents will become freely available once they are two years old. CFA documents available now as pdf downloads:

- CFA High Risk Area Best Practice Guidelines (This is a supplement to the main CFA Good Hygiene Practice Guidelines which are only available as printed copy);
- CFA Packaging Guidelines for Suppliers to the Chilled Food Industry;

Next month, the following will also be available from the website:

- CFA Due Diligence Guidance on the Agricultural Use of Pesticides for Suppliers to Chilled Food Manufacturers;

- CFA Micro Guidance for Produce Suppliers to Chilled Food Manufacturers.

Several other CFA-related publications, such as Sous Vide Guidelines, and Microwaveable Products Design Guidelines, will also be accessible via direct weblinks to the publisher. Visit <http://www.chilledfood.org/> now to download your free copies.

New research projects go ahead

In 2003 and 2004, CFA and DEFRA jointly held two successful workshops on waste technology at which several technological issues were identified as requiring further investigation in order to help the industry implement the Animal By-Products Regulations which come into force on 1 January 2006.

From this date, the landfilling of Category 3 material containing animal by-products will be banned and currently there is no infrastructure for handling this material. Contracts and investments need to be made urgently in this highly dynamic industry with multi-product factories and just-in-time systems.

As a result of the workshops CFA is participating in two DEFRA-funded research projects on waste disposal. The first will investigate where waste arises within production and how companies can minimise that waste. The second involves a DEFRA sponsored PhD at Imperial College studying whole chain impact on waste. CFA is working to establish sustainable disposal routes.

CFA is also co-sponsoring work at IFR which aims to identify pathogen attachment mechanisms to cut-produce surfaces. The results of this work will help determine how pathogens may be detached from these surfaces and hence removed.

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