



COMMISSION CONSULTATION ON FOOD IRRADIATION

FVE COMMENTS

FVE welcomes the opportunity to comment on the European Commission consultation paper on food and food ingredients irradiation.

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General

FVE agrees that the basic principle should be restrictive in allowing irradiation.

FVE fully endorses the view that food irradiation should only be authorised when there is a reasonable technological need, when it is of benefit to the consumer, when it does not present a health hazard and provided it is not used as a substitute for hygiene and health practices or for good manufacturing or agricultural practice.

Good hygiene practice and technological need

In general, FVE does not object to the intention to irradiate special raw food. FVE strongly believes however that irradiation should be strictly limited only to those foodstuffs, where the correct implementation of general and specific hygiene measures (i.e. HACCP, quality assurance schemes) is not sufficient to guarantee or allow a high level of consumer protection.

FVE thus considers that the crucial point is to define a technological need for the irradiation.

Content of the positive list

In principle, the use of irradiation must be limited to very special food. Spices and dried herbs are an example of products, which are suitable for irradiation.

However, FVE finds it difficult to judge the need and the benefit to the consumer of treating the additional products suggested. FVE can agree to the fact that the listed products may present a risk from the hygienic point of view but is of the opinion that improving hygiene during earlier production stages and throughout the whole processing would be a better approach.

Furthermore, the present proposal would enlarge the list of food being treated and would pave the way for further application of these techniques.

FVE supports the view of the Commission, that fresh red meats and poultry meat should not be included in the positive list. The emphasis should instead be placed on the implementation of HACCP procedures in slaughterhouses and meat processing plants to

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reduce microbiological contamination and on the development of assurance schemes at farm level to control pathogen prevalence.

FVE does however not see the technological need for allowing ionisation of mechanically recovered chicken meat, offal from chicken or egg white. Again, good hygiene practices throughout the food chain, HACCP procedures in slaughterhouse and meat processing plants as well as quality assurance schemes at farm level should be enough to guarantee a high level of consumer protection.

FVE recognises that an increased microbiological risk may be associated with frog legs and peeled shrimp imported from third countries. In this case, consumer protection might indeed benefit from a ionisation treatment applied to these products.

Finally, FVE considers that the positive list must be regularly re-assessed as techniques evolve rapidly. FVE would therefore recommend that the need to maintain a food on the positive list be re-evaluated at regular interval (i.e. 1-2 years).

Consumer acceptance and information

FVE recognises that consumers have or may have strong objections to food irradiation. It can thus be expected that opening the positive list too widely would result in consumer rejecting food irradiation techniques, which would not contribute to restoring consumer confidence in food safety. Food irradiation must therefore remain and be seen as a default choice when no other approaches are technologically suitable.

Furthermore, labelling of irradiated food must be mandatory and must be clear to allow consumers to make an informed choice.

Finally, it is important to stress that like any other decontamination method, irradiation can only provide a logarithmic reduction of the microflora, including pathogens, probably 2-3 logs. Irradiated food can therefore only be as safe as the raw material allows it to be. Labelling should therefore be unambiguous on that point and should not give the false impression that the product is safer because treated.

Harmonisation across the EU

The establishment of a common European positive list is welcomed as it will provide for an equal level of consumer protection throughout Europe.