

## **Guest column\***

### **Harmonisation of microbiological criteria in Europe: a long way to go?**

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The production of safe food is a top priority in the European Community. Improving consumer confidence would undoubtedly stimulate the regional economy and the European Commission insists that foods need to be ‘absolutely’ safe.

To produce microbiologically safe food, a number of key objectives must be met, especially:

- 1) harmonising the patchwork of different microbiological criteria that currently exist in Member States;
- 2) setting end-product criteria that are based on microbiological risk analysis;
- 3) the use of a food-safety management system, such as HACCP.

Because food production is not co-ordinated, microbiological criteria have been used in various ways. Examples include the testing of raw materials to ensure their quality and testing of the end-product to determine the efficacy of heat processing or whether re-contamination has occurred. For these purposes, use has been made of so-called ‘indicator organisms’ and specific criteria have been set for key pathogens. However, from statistical considerations, it is obvious that end-product testing does not provide any guarantee that the food in question is necessarily safe.

In the new **Food Hygiene Regulation 853/2004**, the European Commission is trying to harmonise the patchwork of existing criteria. Those proposed previously, however, are being hotly debated. The main reason is that some are directed at end-product safety and others are

more concerned with commercial acceptability of the product in manufacture, handling and distribution. In addition, the absence criteria set for certain types of consumer products, such as fresh, ready-to-eat vegetables and certain raw meat products, are difficult to meet, if they can be met at all.

The use of microbiological criteria may result in at least two problems:

*Firstly:* Guidance criteria could interfere with the HACCP system, which is a legal responsibility of the food producer.

*Secondly:* The penalty for a product that does not meet the necessary criteria (suspect batches cannot enter the market or must be re-called) might easily result in additional criteria that are set by customers, but are not legally based.

Indeed, there is a long way to go before harmonised and unequivocal microbiological criteria can be established in Europe.

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