

LACTIC ACID WASHES WILL DILUTE OUR FARM TO FORK APPROACH TO FOOD SAFETY

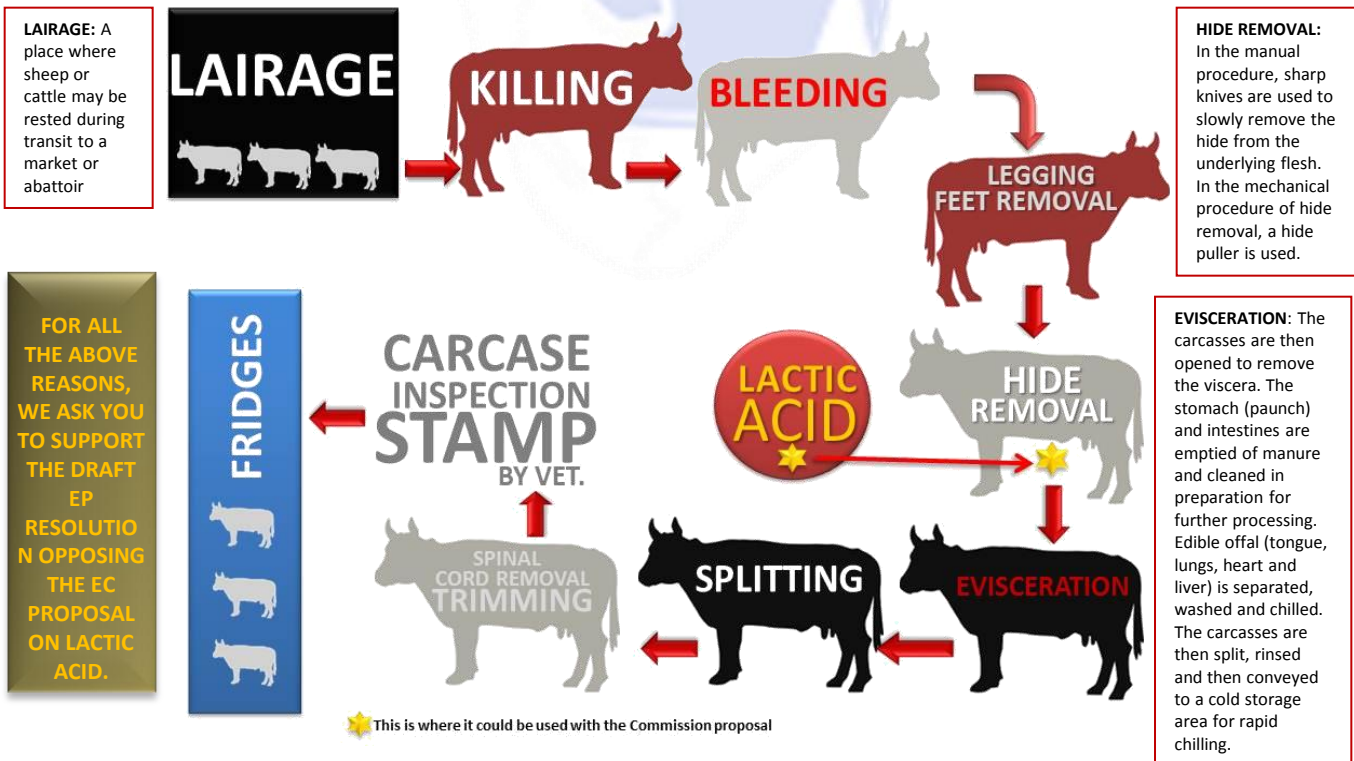
BEUC, the European Consumer Organisation, strongly supports the draft EP resolution objecting to the European Commission proposal to authorise the use of lactic acid to reduce microbial surface contamination on bovine carcasses.

To date, no such decontamination treatment has been approved in the EU where the “farm to fork” approach to food hygiene - whereby good hygienic practices must be in place all along the chain to guarantee that food is safe - has resulted in a high level of safety for EU food.

The use of lactic acid is being promoted as a means of even further reducing trace microbial contamination on carcasses. Although this may sound like a good idea, BEUC is not convinced that lactic acid use will help produce “safer” meat - rather the opposite.

We fear indeed that lactic acid may be used to mask poor hygiene practices in the slaughterhouse. Strong safeguards are needed to ensure this would not be the case, which are missing from the current proposal. It is essential that, if it were ever to be permitted, lactic acid may only be applied after final inspection by the official vet guaranteeing that meat is fit for consumption.

However, the proposal which is on the table would allow slaughterhouse staff to use lactic acid at any time on the slaughter line (e.g. skin removal): given the way the line operates (see figure below), there is the potential for recontamination at a later stage (e.g. evisceration) but, in addition, this would also prevent the random sampling of non-treated carcasses to check compliance with microbiological criteria demonstrating proper food safety management. Ultimately, we are concerned that, if application of lactic acid washes is adopted in the EU, we will move to a system where even less care is taken to prevent the contamination of meat during the dressing procedure.





BEUC Q&A ON LACTIC ACID

Why is BEUC generally not supportive of any kind of meat decontamination treatments?

BEUC firmly supports the EU's "farm to fork" approach to food hygiene whereby good hygienic practices (GHP) must be in place all along the production chain to guarantee that food sold to the final consumer is safe.

As long as GHP are complied with and HACCP systems are well managed by food business operators (FBOs) - as required by EU law – there should be no need for additional treatments of meat. Rather, we are concerned that such treatments may result in a lowering of EU hygiene standards as less scrupulous FBOs might see them as a convenient substitute for good husbandry and hygienic practices on the farm or in the slaughterhouse.

A number of Member States share our concerns and either voted against or abstained from voting on the EC lactic acid proposal at Standing Committee level on 21 September.

What would be the purpose of using lactic acid on bovine carcasses?

The European Commission has proposed lactic acid as an "extra" safety tool to reduce further trace microbial contamination on bovine carcasses. However, this would not be a guarantee of "zero risk": several factors may affect the efficacy of the treatment (concentration, temperature, etc.).

Additionally, it could not be excluded that meat is re-contaminated further along the line (and since lactic acid may remove the normal competitive micro flora – i.e. "good" bacteria -, it may render carcasses susceptible to the preferential growth of pathogens). Another reason which is being given for authorising lactic acid in the EU is the fact that this and other treatments are commonly used in some third countries, therefore it is expected that it would ease some trade barriers.

BEUC does not believe we should compromise the EU's high standards when it comes to our approach to food safety. Rather, it should be up to third countries to meet our strict standards.

Why is BEUC concerned with the contemplated approval of lactic acid use on meat?

Lactic acid itself is not a risk. It occurs naturally (including in muscle) and EFSA itself concluded that its use on beef carcasses would pose no safety issues ¹. Our main concern lies with the timing of application of lactic acid in the slaughter line. The proposal which is on the table would allow application of lactic acid prior to final inspection by the official vet (who declares meat fit for consumption with the "health mark") and we therefore believe there is the risk that lactic acid could be used as a substitute for GHP rather than a complement to it, hence putting consumers' health at risk.

¹EFSA did note, however, that the studies on which it based its assessment of the efficacy of lactic acid used a wide range of experimental designs. As several factors can affect efficacy of lactic acid (concentration, temperature of application, etc.), EFSA recommended that FBOs should validate the antimicrobial efficacy under their specific processing conditions.



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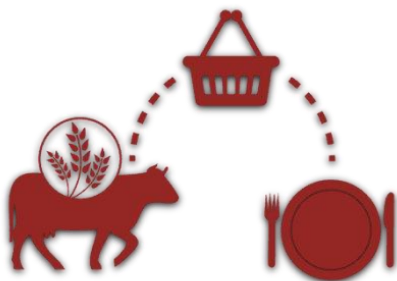
In other words, lactic acid may be used to mask poor hygiene practices: for instance, slaughterhouse staff might use it to “clean up” faecal contamination. Even though the EC proposal provides that this should not happen, it would be difficult to control in practice (which is why, today, no carcasses are authorised to be washed before final inspection). Applying lactic acid early in the slaughter chain (e.g. skin removal) might also mean running the risk that meat is re-contaminated at a later stage (e.g. evisceration), hence rendering lactic acid inefficient.

Moreover, it would prevent the reliable sampling of (non-treated) carcasses to check compliance with the microbiological criteria set by EU law to demonstrate proper food safety management by FBOs. As some carcasses would have to pass the slaughter line without the application of lactic acid, slaughterhouse staff would necessarily know beforehand which carcasses would be sampled and may therefore treat these with extra care. This would make sampling non-representative – hence unfit to control GHP compliance.

What is consumer acceptance of meat treated with decontamination agents?

Recent research by the consumer organisation Which?² showed that most consumers would not be willing to buy meat (chicken) that has been treated chemically.

In another study³ in Finland, nearly 90% of respondents were of the opinion that they would not choose chemically treated poultry meat. We therefore insist that use of decontamination agents should be transparent for consumers, meaning that proper labelling should be in place to let them know whether or not their meat has been treated.



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² Survey of 1,406 UK adults. 60% of respondents were unlikely to buy chicken that had been sprayed or washed with a mild acid such as lactic acid, and 67% were unlikely to buy chicken that had been treated with chlorine).

³ Heikkilä, J., Pouta, E., Forsman-Hugg, S., Mäkelä, J. (2011) Consumer risk perceptions of zoonotic, chemical and gm risks: the case of poultry purchase intentions in Finland. Paper prepared for presentation at the EAAE 2011 Congress Change and Uncertainty.

