PRINCIPLES FOR THE ESTABLISHMENT AND APPLICATION OF MICROBIOLOGICAL CRITERIA FOR FOODS

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INTRODUCTION

These Principles are intended to give guidance on the establishment and application of microbiological criteria for foods at any point in the food chain from primary production to final consumption.

The safety of foods is principally assured by control at the source, product design and process control, and the application of Good Hygienic Practices during production, processing (including labelling), handling, distribution, storage, sale, preparation and use, in conjunction with the application of the HACCP system. This preventive approach offers more control than microbiological testing because the effectiveness of microbiological examination to assess the safety of foods is limited. Guidance for the establishment of HACCP based systems is detailed in *Hazard Analysis and Critical Control Point System and Guidelines for its Application* (Annex to CAC/RCP 1-1969, Rev. 3-1997).

Microbiological criteria should be established according to these principles and be based on scientific analysis and advice, and, where sufficient data are available, a risk analysis appropriate to the foodstuff and its use. Microbiological criteria should be developed in a transparent fashion and meet the requirements of fair trade. They should be reviewed periodically for relevance with respect to emerging pathogens, changing technologies, and new understandings of science.

1. DEFINITION OF MICROBIOLOGICAL CRITERION

A microbiological criterion for food defines the acceptability of a product or a food lot, based on the absence or presence, or number of microorganisms including parasites, and/or quantity of their toxins/metabolites, per unit(s) of mass, volume, area or lot.

2. COMPONENTS OF MICROBIOLOGICAL CRITERIA FOR FOODS

2.1 A microbiological criterion consists of:

- a statement of the microorganisms of concern and/or their toxins/metabolites and the reason for that concern (see § 5.1);
- the analytical methods for their detection and/or quantification (see § 5.2);
- a plan defining the number of field samples to be taken and the size of the analytical unit (see § 6);
- microbiological limits considered appropriate to the food at the specified point(s) of the food chain (see §

5.3);

- the number of analytical units that should conform to these limits.

2.2 A microbiological criterion should also state:

- the food to which the criterion applies;
- the point(s) in the food chain where the criterion applies; and
- any actions to be taken when the criterion is not met.

2.3 When applying a microbiological criterion for assessing products, it is essential, in order to make the best use of money and manpower, that only appropriate tests be applied (see § 5) to those foods and at those points in the food chain that offer maximum benefit in providing the consumer with a food that is safe and suitable for consumption.

3. PURPOSES AND APPLICATION OF MICROBIOLOGICAL CRITERIA FOR FOODS

3.1 Microbiological criteria may be used to formulate design requirements and to indicate the required microbiological status of raw materials, ingredients and end-products at any stage of the food chain as appropriate. They may be relevant to the examination of foods, including raw materials and ingredients, of unknown or uncertain origin or when other means of verifying the efficacy of HACCP-based systems and Good Hygienic Practices are not available. Generally, microbiological criteria may be applied to define the distinction between acceptable and unacceptable raw materials, ingredients, products, lots, by regulatory authorities and/or food business operators. Microbiological criteria may also be used to determine that processes are consistent with *the General Principles of Food Hygiene* (CAC/RCP 1-1969).

3.1.1 Application by regulatory authorities

Microbiological criteria can be used to define and check compliance with the microbiological requirements.

Mandatory microbiological criteria shall apply to those products and/or points of the food chain where no other more effective tools are available, and where they are expected to improve the degree of protection offered to the consumer. Where these are appropriate they shall be product-type specific and only applied at the point of the food chain as specified in the regulation.

In situations of non-compliance with microbiological criteria, depending on the assessment of the risk to the consumer, the point in the food chain and the product-type specified, the regulatory control actions may be sorting, reprocessing, rejection or destruction of product, and/or further investigation to determine appropriate actions to be taken.

3.1.2 Application by a food business operator

In addition to checking compliance with regulatory provisions (see § 3.1.1) microbiological criteria may be applied by food business operators to formulate design requirements and to examine end-products as one of the measures to verify and/or validate the efficacy of the HACCP plan.

Such criteria will be specific for the product and the stage in the food chain at which they will apply. They may be stricter than the criteria used for regulatory purposes and should, as such, not be used for legal action.

3.2 Microbiological criteria are not normally suitable for monitoring Critical Limits as defined in *Hazard Analysis and Critical Control Point System and Guidelines for its Application* (Annex to CAC/RCP 1-1969, Rev. 3-1997). Monitoring procedures must be able to detect loss of control at a Critical Control Point (CCP). Monitoring should provide this information in time for corrective actions to be taken to regain control before there is a need to reject the product. Consequently, on-line measurements of physical and chemical parameters are often preferred to microbiological testing because results are often available more rapidly and at the production site. Moreover, the establishment of Critical Limits may need other considerations than those described in this document.

4. GENERAL CONSIDERATIONS CONCERNING PRINCIPLES FOR ESTABLISHING AND APPLYING MICROBIOLOGICAL CRITERIA

4.1 A microbiological criterion should be established and applied only where there is a definite need and where its application is practical. Such need is demonstrated, for example, by epidemiological evidence that the food under consideration may represent a public health risk and that a criterion is meaningful for consumer protection, or as the result of a risk assessment. The criterion should be technically attainable by applying Good Manufacturing Practices

(Codes of Practice).

4.2 To fulfill the purposes of a microbiological criterion, consideration should be given to:

- the evidence of actual or potential hazards to health;
- the microbiological status of the raw material(s);
- the effect of processing on the microbiological status of the food;
- the likelihood and consequences of microbial contamination and/or growth during subsequent handling, storage and use;
- the category(s) of consumers concerned;
- the cost/benefit ratio associated with the application of the criterion; and
- the intended use of the food.

4.3 The number and size of analytical units per lot tested should be as stated in the sampling plan and should not be modified. However, a lot should not be subjected to repeated testing in order to bring the lot into compliance.

5. MICROBIOLOGICAL ASPECTS OF CRITERIA

5.1 Microorganisms, parasites and their toxins/metabolites of importance in a particular food

5.1.1 For the purpose of this document these include:

- bacteria, viruses, yeasts, moulds, and algae;
- parasitic protozoa and helminths;
- their toxins/metabolites.

5.1.2 The microorganisms included in a criterion should be widely accepted as relevant - as pathogens, as indicator organisms or as spoilage organisms - to the particular food and technology. Organisms whose significance in the specified food is doubtful should not be included in a criterion.

5.1.3 The mere finding, with a presence-absence test, of certain organisms known to cause foodborne illness (e.g. *Clostridium perfringens, Staphylococcus aureus* and *Vibrio parahaemolyticus*) does not necessarily indicate a threat to public health.

5.1.4 Where pathogens can be detected directly and reliably, consideration should be given to testing for them in preference to testing for indicator organisms. If a test for an indicator organism is applied, there should be a clear statement whether the test is used to indicate unsatisfactory hygienic practices or a health hazard.

5.2 Microbiological methods

5.2.1 Whenever possible, only methods for which the reliability (accuracy, reproducibility, inter- and intra-laboratory variation) has been statistically established in comparative or collaborative studies in several laboratories should be used. Moreover, preference should be given to methods which have been validated for the commodity concerned preferably in relation to reference methods elaborated by international organizations. While methods should be the most sensitive and reproducible for the purpose, methods to be used for in-plant testing might often sacrifice to some degree sensitivity and reproducibility in the interest of speed and simplicity. They should, however, have been proved to give a sufficiently reliable estimate of the information needed.

Methods used to determine the suitability for consumption of highly perishable foods, or foods with a short shelf-life, should be chosen wherever possible so that the results of microbiological examinations are available before the foods are consumed or exceed their shelf-life.

5.2.2 The microbiological methods specified should be reasonable with regard to complexity, availability of media, equipment etc., ease of interpretation, time required and costs.

5.3 Microbiological limits

5.3.1 Limits used in criteria should be based on microbiological data appropriate to the food and should be applicable to a variety of similar products. They should therefore be based on data gathered at various production

establishments operating under Good Hygienic Practices and applying the HACCP system.

In the establishment of microbiological limits, any changes in the microflora likely to occur during storage and distribution (e.g. decrease or increase in numbers) should be taken into account.

5.3.2 Microbiological limits should take into consideration the risk associated with the microorganisms, and the conditions under which the food is expected to be handled and consumed. Microbiological limits should also take account of the likelihood of uneven distribution of microorganisms in the food and the inherent variability of the analytical procedure.

5.3.3 If a criterion requires the absence of a particular microorganism, the size and number of the analytical unit (as well as the number of analytical sample units) should be indicated.

6. SAMPLING PLANS, METHODS AND HANDLING

6.1 A sampling plan includes the sampling procedure and the decision criteria to be applied to a lot, based on examination of a prescribed number of sample units and subsequent analytical units of a stated size by defined methods. A well-designed sampling plan defines the probability of detecting microorganisms in a lot, but it should be borne in mind that no sampling plan can ensure the absence of a particular organism. Sampling plans should be administratively and economically feasible.

In particular, the choice of sampling plans should take into account:

- risks to public health associated with the hazard;
- the susceptibility of the target group of consumers;
- the heterogeneity of distribution of microorganisms where variables sampling plans are employed; and
- the Acceptable Quality Level[1] and the desired statistical probability of accepting a non-conforming lot.

For many applications, 2-or 3-class attribute plans may prove useful. [2]

6.2 The statistical performance characteristics or operating characteristics curve should be provided in the sampling plan. Performance characteristics provide specific information to estimate the probability of accepting a non-conforming lot. The sampling method should be defined in the sampling plan. The time between taking the field samples and analysis should be as short as reasonably possible, and during transport to the laboratory the conditions (e.g. temperature) should not allow increase or decrease of the numbers of the target organism, so that the results reflect - within the limitations given by the sampling plan - the microbiological conditions of the lot.

7. REPORTING

7.1 The test report shall give the information needed for complete identification of the sample, the sampling plan, the test method, the results and, if appropriate, their interpretation.

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[1] The Acceptable Quality Level (AQL) is the percentage of non-conforming sample units in the entire lot for which the sampling plan will indicate lot acceptance for a prescribed probability (usually 95 per cent).

[2] See ICMSF: Microorganisms in Foods, 2. Sampling for Microbiological Analysis. Principles and Specific Applications, 2nd Edition, Blackwell Scientific Publications, 1986 (ISBN-0632-015-675).