

SUMMARY OF SUBSTANTIVE COMMENTS TO THE CONSULTATION ON THE ACMSF'S THIRD REPORT CAMPYBACTER

Respondent	Comment	Response
British Poultry Council Richard Griffiths (Chief Executive)	On behalf of the British Poultry Council; we welcome the ACMSF Third Report on Campylobacter and appreciate the work that has gone into compiling it. We feel that it is a broadly accurate representation of the subject for the period it covers, and therefore have no comments to make at this time.	Thank you for welcoming ACMSF's Third Report on Campylobacter.

Respondent	Comment	Response
<p>Moy Pack Gary McMahon (Company Microbiologist)</p>	<ul style="list-style-type: none"> • Chapter 5 – Growing demand for broiler meat which can only be satisfied by using broiler systems that may affect bird health, welfare and performance.....it is essential that disease and poor welfare which can compromise productivity, are better controlled and associated antimicrobial use is reduced. <ul style="list-style-type: none"> ○ Due to the significant reductions already taken the poultry industry which have been publicly recognised and the engagement of the industry in the antibiotic stewardship working groups, we feel these published facts should be included here as well to provide a more balanced chapter. 	<p>Thank you for your helpful comments. Paragraph has been amended (see red text) to reflect UK industry’s efforts to reduce the use of antibiotics in animal husbandry.</p> <p>Chapter 5 – Growing demand for broiler meat which can only be satisfied by using broiler systems that may affect bird health, welfare and performance.....it is essential that disease and poor welfare which can compromise productivity, are better controlled and associated antimicrobial use is reduced. <i>It is recognised that the UK poultry industry has made improvements in recent years in reducing the use of antibiotics.</i></p>
	<ul style="list-style-type: none"> • Paragraph 5.11, “Chicken production should be sustainable, with a safe product and good bird welfare. The international poultry industry can find this difficult to achieve and birds can experience poor welfare....” <ul style="list-style-type: none"> ○ It is felt that this can be interpreted that good welfare is in the minority which sends out the wrong message, particularly about the UK industry. 	<p>Thank you for comment. The queried sentence has been revised to the following (see red text for changes):</p> <ul style="list-style-type: none"> • Paragraph 5.11 has acknowledged this comment with the words in red inserted, “Chicken production should be sustainable, with a safe product and good bird welfare. The international poultry industry can find this difficult to achieve <i>on occasions</i> and birds can experience poor welfare....”.
	<ul style="list-style-type: none"> • Paragraph 5.103 – spelling mistake on Sonasteam 	<p>Noted. Spelling correction has made in the report Paragraph 5.103..</p>

	<ul style="list-style-type: none"> Paragraph 6.3 – reference to impending EU PHC Reg and not knowing what the levels will be – this is already out of date as the PHC detailed in EU2073/2005 (amended) with its levels between now and 2025 have been in place since January 2018. 	<p>Thank you for highlighting this. Chapter 6 Paragraph 6.3 has been reworded as follows (red text reflects changes):</p> <p><i>Campylobacter</i> is acknowledged as a concern in broiler production across Europe and the European Commission has initiated preliminary talks with Member States on a number of measures related to the control of <i>Campylobacter</i>. The main measure is the introduction of a process hygiene criterion (PHC) for <i>Campylobacter</i> in broilers (EU 2017/1495), but the UK is far ahead of many MS in reducing <i>Campylobacter</i> levels in poultry meat. Whilst many MS accept the need for PHC to help reduce levels of <i>Campylobacter</i>, they are less ambitious than the UK regarding the criteria, and current targets of <40% >1000 reducing to 20% by 2025 are well above those set voluntarily by food business operators as part of the FSA campaign, ‘Acting on <i>Campylobacter</i> Together’.</p>

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<p>British Retail Consortium Elizabeth Andoh-Kesson (Food Policy Adviser)</p>	<p>Emergence of Aerotolerant strains</p> <p>We would welcome more research in this area and whether there is any effect from commercially used gas mixes used in retail packaging may have in selecting for these tolerant stains.</p>	<p>Thank you for your comment. We recognise the value of funding research in this area.</p>
	<p>Vaccine Development</p> <p>Given some of the conclusions within the report relating to the tolerant state of some strains we fully support further work to develop suitable vaccines.</p>	<p>Thank you comment which is noted.</p>
	<p>Increased <i>D</i> values</p> <p>Work in this area is limited and we would be keen to understand the significance of the conclusions cited. Retailers require their suppliers to validate cooking regimes used for manufacture and instructions given on pack, we welcome the recommendation to determine the reproducibility of the results found. This is of particular significance for catering establishments, domestic cooking and production of ready to eat products.</p>	<p>We note your agreement with our recommendations.</p>
	<p>Retail Surveillance and Other Sources</p>	

	<p>We acknowledge the recommendations relating to food vehicles with poultry indicated as remaining the greatest risk. The link to raw milk is unsurprising and should be monitored particularly as this product has a core following and its consumption is growing in popularity. Raw milk is already on the FSA's agenda but we are not clear whether microbiological assessment of campylobacter in this product is undertaken to determine correlation to strains found in campylobacteriosis cases. Anecdotally we understand that this is not a routine area for microbiological screening by public analysts.</p> <p>We welcome the recommendations for more information/research to fully investigate source attribution in food and the environment. The affinity for campylobacter to colonise chickens is also an area where we would welcome further research.</p>	<p>We note your comments on this section of the report.</p>
	<p>Consumers</p> <p>Major retailers continue to work with suppliers to ensure that incidence of campylobacter is as low as possible. Interventions including leak proof, gas flushed packaging and clear labelling on hygiene best practice and cooking of chicken is provided by all.</p> <p>The FSA's work to monitor consumer practice is helpful and we support the recommendations to continue this and implement targeted interventions where necessary.</p>	<p>Thank you for this comment which is noted.</p> <p>Thank you for supporting our recommendations.</p>

	<p>We hope that the recommendations of the ACMSF will receive appropriate consideration by the FSA and the resource will be made available to support our continued efforts to minimise campylobacter levels.</p>	<p>We will work with the FSA in taking these recommendations forward.</p>
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