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Feedback on draft amending regulation 853/ 2004

The Norwegian Veterinary Association wishes to give the following feedback on amending and correcting Annex III to Regulation (EC) No 853/2004 regarding the introduction of the obligation to set, at not more of 28 days after laying, the date of minimum durability for eggs, and suppression of the obligation to deliver eggs to the consumer within a maximum period of 21 days after laying.

The argument for this amendment is to reduce the risk of illness caused by Salmonella Enteridis infection. Since many Member States have no requirements regarding time and temperature conditions during the storage and transportation of eggs it is important to lay down a date of minimum durability(a best before date) for eggs.

Norway is for all practical purposes free from Salmonella Enteritidis infections caused by consumption of eggs, with a negligible prevalence of Salmonella in eggs.

For this reason some countries, such as Norway, Sweden, Finland and Denmark have been granted special guarantees concerning salmonella in eggs, and a monitoring program is in place to ensure the country's salmonella status for eggs.

In addition to this, Norway has a national regulation with requirements for an unbroken cooling chain for eggs. Eggs should be kept at no more than 12 degrees Celcius from the time of laying until they reach the consumer.

Norwegian consumers then keep their eggs refrigerated.

Because of these factors, Norwegian eggs are fit for human consumption for a considerably longer time period than 28 days after laying. Investigations have shown that table eggs are fit for consumption several months after laying.

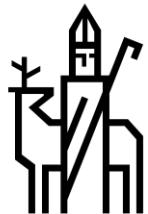
Food waste is an issue that all parts of society can unite in reducing. It is the responsibility of Food Business Operators to set shelf lives such that food safety is assured. However, the shelf life of a food must be assessed carefully and with the full knowledge of the risks involved. Eggs are the only food category in the hygiene regulation that have such detailed rules for shelf life. We understand that salmonella is a considerable problem in many Member States, and we support the concern for food safety. However, providing more

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flexibility for the countries that have a demonstrable low prevalence of salmonella and cooling systems for transport and storage, would improve the regulatory framework and be a good tool against food waste, in line with the "Farm to fork" strategy.

In Norway, we have an agricultural structure with small flocks of maximum 7500 hens per farm. Eggs are therefore normally collected only once a week, meaning that they have lost 7 days of their shelf life when they reach the egg packing facility. By increasing the flexibility for the sell-by date, this would mean that it would be easier to keep our structure of small flocks spread throughout the country. Collecting the eggs several times a week, as they do in several other European countries, means increased costs and increased transport times, something which we believe is not compatible with sustainable agriculture.

High Patogenic Avian Influenza can be a threat to the supply of eggs and chicken meat. Maintaining good animal health status is important. The suggested amendment will have a centralizing effect on the Norwegian poultry industry, with higher risks for serious animal health problems and negative effects on climate change.

The regulatory framework should aim to reward good management, in order to maintain good public health, diminish food waste, and reward sustainable systems for production.

This suggested amendment could in our opinion lead to the opposite result if it excludes the possibility for flexibility and incentives to more healthy and sustainable production. By adopting this amendment, the only incentive is that eggs are safe to consume within 28 days after laying. The effect will be a competitive disadvantage for best practice farmers in countries with stricter national rules and better preventive measures, compared to farmers and countries with poorer quality assurance procedures.

In order to reward good health management with reduced public health incidents, reduced food waste and good sustainable food production systems, we strongly recommend a regulatory framework that is flexible to support countries with lower salmonella prevalence. This is a good example which can leads to a great change in all European countries.

Regards

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