

## RESPONSES TO COMMENTS RECEIVED FROM THE PUBLIC CONSULTATION ON DRAFT FOOD (AMENDMENT NO. X) REGULATIONS 2022

The Singapore Food Agency (SFA) initiated a public consultation on the Draft Food (Amendment No. X) Regulations 2022 concerning provisions for the use of Pathogen Reduction Treatments (PRTs) (hereinafter referred to as the “new PRT regulations”), from 7 February 2022 to 8 April 2022. Concurrently, trading partners and interested parties were notified via World Trade Organisation (WTO) SPS notification G/SPS/N/SGP/76 during the same period.

At the close of the public consultation exercise and WTO notification period, SFA received comments from 5 respondents. SFA’s responses are tabulated in **Table 1**.

SFA appreciates the time taken by stakeholders to submit feedback and comments which would contribute to the decision-making process. The amendments are targeted to come into effect in the third quarter of 2022. We would like to encourage all parties to actively participate in future consultations.

**TABLE 1**

<b>A. Comments on labelling of meat treated with PRT</b>	<b>SFA's response</b>
<p>1. Two respondents sought clarification on whether PRTs need to be declared in the statement of ingredients when used on meat.</p> <p>2. One of the two respondents further enquired if PRTs need to be declared in the statement of ingredients of a food product that contains PRT-treated meat as an ingredient.</p>	<p>PRTs, when used in accordance with the new PRT regulations, would be regarded as processing aids. Prepacked meat that has been treated with permitted PRTs, as well as prepacked food products containing PRT-treated meat as an ingredient, do not need to label the presence of the PRT in the statement of ingredients of the prepacked food product.</p>
<b>B. Comments on the list of PRTs in the new Seventeenth Schedule</b>	
<p>3. One respondent sought clarification on whether the PRTs listed in the new Seventeenth Schedule could be used in blends.</p> <p>4. The same respondent commented that the US Food Safety Inspection Service's (FSIS) Export Library contained a list of acidifiers / alkalizers that may be used to adjust the pH of the antimicrobial agents used on meat and poultry products exported to Singapore. However, as these compounds are not listed in the new Seventeenth Schedule, the respondent enquired if they are permitted in Singapore.</p> <p>5. One other respondent enquired on the meaning of "good manufacturing practice" in the context of maximum permitted levels for PRT.</p>	<p>The PRTs listed in the new Seventeenth Schedule may be used in blends, at levels not exceeding their respective limits.</p> <p>In the case of acidifiers and alkalizers listed in the US FSIS Export Library, SFA notes that these are added to the PRT preparation prior to application on meat and would be considered to be processing aids. SFA has no objections to the use of these acidifiers and alkalizers as long as they comply with the Codex Guidelines on Substances Used as Processing Aids (CAC/GL 75-2010), or, are listed as permitted food additives in Part 1 of the Eighth Schedule of the Food Regulations.</p> <p>"Good manufacturing practice", means that the quantity of the PRT added to the specified food in the proposed Seventeenth Schedule shall be limited to the lowest possible level necessary to accomplish its desired effect.</p>

<b>C. Comments on the scope of the new PRT regulations</b>	
<p>6. Three respondents collectively enquired if “meat” that is allowed to be treated with PRTs includes beef, pork, poultry and seafood.</p> <p>7. One respondent enquired if the use of PRTs on cattle hides would fall under the scope of the new PRT regulations, noting that PRTs could be used on cattle hides as an intervention step to reduce microbial loads on the hide prior to slaughter, but the PRTs do not come into contact with meat.</p> <p>8. One respondent sought clarification if the direct use of PRTs on minced or chopped meat, as well as food products containing meat ingredients, was allowed.</p>	<p>Permitted PRTs may be used only on the three types of meat specified in the new Seventeenth Schedule, namely carcass, muscle cut and offal. “Meat”, as defined under section 59 of the Food Regulations, means “any edible part of the carcass of any animal or bird, healthy at the time of slaughter, which is ordinarily used as food by man, whether fresh, or prepared by freezing, chilling, preserving, salting or by any other process”.</p> <p>Hides are not edible and do not fall under the definition of “meat”. Therefore, the new PRT regulations do not apply to hides.</p> <p>PRT-treated meat may be used as ingredients in other food products, or to make minced or chopped meat. The direct addition of PRTs to minced or chopped meat, as defined under Regulation 64 of the Food Regulations, is not allowed. Nonetheless, PRTs may be carried over into the minced or chopped meat from its use on raw meat (e.g. carried over from use on carcass or muscle cut). Therefore, amendments will be made to Regulation 64 to allow the presence of permitted PRTs in minced or chopped meat as a result of carryover from usage on raw meat.</p> <p>Seafood is not covered under the new PRT regulations. SFA will review the use of PRTs on seafood in the future.</p>

<p><b>D. Comments on non-liquid forms of PRTs</b></p>	
<p>9. One respondent asked if non-liquid forms of PRTs were allowed under the new PRT regulations.</p>	<p>Non-liquid forms of PRTs (gaseous or solid) are allowed, as indicated by the word “spray”, in the new PRT regulations, which would allow the PRT to be in gaseous or solid forms.</p>
<p><b>E. Comments on approval process for new PRTs</b></p>	
<p>10. Three respondents enquired on Singapore’s process for reviewing and approving the use of new PRTs.</p>	<p>Upon request and submission of full information by interested parties, SFA will assess the safety of a new PRT and, if safety can be established, subsequently approve its use. This is in line with the current approach for assessment and approval of new food additives, as described in the document <a href="#">“Guidance Information on Requirement for Food Additives”</a> published on the SFA website. The information SFA would require for assessment is as follows:</p> <ol style="list-style-type: none"> <li>a) Identity of the PRT, including its mechanism of action and efficacy;</li> <li>b) How is the PRT used (i.e. proposed usage levels, type of food to be applied on, and time and temperature of use), including a process flowchart indicating points of usage in a meat establishment;</li> <li>c) Residual levels of the PRT in the finished food product, and degradation products (if any) and the methods of detection; and</li> <li>d) Safety assessments of the PRT (may be from the company, food safety authorities, international bodies or peer-reviewed scientific studies) and legislation showing that the PRT is approved by food safety authorities.</li> </ol>

<p><b>F. Comments on parties responsible for record keeping</b></p>	
<p>11. One respondent sought clarification on the parties responsible for keeping records of PRT usage.</p>	<p>The record keeping requirements in the new PRT regulations apply only to parties who use PRTs on meat, in this case, it would be the SFA-licensed slaughterhouses and meat cutting plants that use PRTs on meat. The record keeping requirements do not apply to importers or retailers.</p>
<p><b>G. Comments on adopting the EU's approach towards PRTs</b></p>	
<p>12. One respondent suggested to adopt the approach of the EU towards PRTs as he was of the view that the EU has the public good in mind when it comes to food safety.</p>	<p>SFA approves PRTs after a rigorous safety assessment process which involves examining how the PRT acts on microbes, how it is applied, the levels of residues left on the meat product and whether these residues are safe.</p> <p>SFA recognises that PRTs, when used properly, reduce the concentration of pathogenic microbes on meat. There is clear scientific evidence that PRTs are an efficacious additional food safety measure that the food industry can utilise to improve the safety of meat. The Codex Alimentarius' "Guidelines for the Control of on Campylobacter and Salmonella in Chicken Meat (CAC/GL 78/2011)" recommends the use of certain PRTs as a risk mitigation step.</p> <p>The EU has allowed the use of lactic acid as a PRT on bovine carcasses. Other major developed countries, namely the United States, Australia, Japan and Canada have approved the use of a range of PRTs on meat.</p>