

The following aspects might be addressed in a common position to the upcoming Salmonella criteria:

- **Transitional measures:** by introducing traditional measures only and not reconsidering the policy on microbiological criteria and the consistency of the legislation, the problem will just be postponed.
- **Consistency in legislation:** the Salmonella criteria in different legislations should be reconsidered in line with the principle of better regulation. The S. criterion in 2160/2003 should be eliminated and the criteria in 2073/2005 should be reconsidered. Fresh poultry meat that is not intended to be eaten raw should only be tested for S.e. und S.t.
- **Harmonisation:** the rules and procedures on sampling, testing and interventions should be harmonised in the MS.
- **Date of application:** the date of 12 December 2010 should be postponed and the S.e. and S.t. criterion should come into force at the earliest by the end of 2013.
- **Scope of Salmonella criterion:** it should only apply at slaughterhouse level which would mean that once the meat has left the establishment and if later on it is found positive for Salmonella the corrective measure and intervention is directed to the slaughterhouse and not to the distribution chain. Thus the withdrawal and the recall become superfluous.
- **Salmonella serotypes:** because flocks are only be tested for S.e. and S.t. the meat should also only be tested for the two serotypes and if it is found positive it should not be marketed unless it has undergone sufficient treatment to eliminate Salmonella.
- **Sampling procedure:** should be practicable and economically justifiable and an additional stocking period of poultry meat should be excluded.
- **Sampling method:** in the depth of the muscle after the surface of the poultry meat has been denatured by heat.
- **Sample size:** 10 grams instead of 25 grams.
- **Derogation:** might be introduced similar to the derogation in regulation 2073/2005 and meat from derogating MS might be marketed on the internal market only if the derogating MS can safeguard sufficiently the other MS and guarantee the poultry meat complies with the EU requirements.
- **Communication:** an EU wide campaign targeting consumers and food business on how to prepare and cook food properly and more specifically poultry meat should be launched. A lot of expensive measures are undertaken at the levels of primary production and food production. Due to lack of hygiene at consumers' level the outcome of measures is wasted.

The Commission, as expressed in the stakeholders' meeting and in its responses to our previous common letters, is not very willing to amend the regulations 2160/2003 and 2073/2005. This would mean that some of the abovementioned points will not be accepted.