

Joint scientific advice of the Scientific Committee of the FASFC (Advice 22-2017) and of the Superior Health Council (N° 9428) in regard to the draft royal decree amending the royal decree on food hygiene: medical certificate

Background & Terms of Reference

The Scientific Committee (SciCom) has been asked by the DG Control Policy of the Federal Agency for the Safety of the Food Chain (FASFC) to give an opinion on the revocation of the requirement for all persons handling foodstuffs to be in possession of a medical certificate. Given that the issue concerns employee protection and food safety as well as protection of public health, SciCom has involved the Superior Health Council (SHC) in the present opinion in order to provide a joint scientific opinion.

Methodology

SciCom and SHC have evaluated the revocation of the requirement to be in possession of a medical certificate for all persons handling foodstuffs. This is based on expert opinion, data from scientific literature and data collected from outbreaks.

Result

Persons handling foodstuffs can represent a source of contamination for foodstuffs, either as carriers or as vectors. Carriers are persons infected with pathogenic microorganisms and may or may not have symptoms. Persons acting as vector are contaminated while handling foodstuffs or after contact with an infected person and may transfer this contamination to (other) foodstuffs. The opinion applies solely to contamination of foodstuffs by carriers of pathogenic microorganisms.

Persons coming in direct contact with foodstuffs are currently required to undergo a medical examination on entering employment. Every three years, the medical examination must be repeated. Moreover, a medical examination is mandatory before activities can be resumed following a work stoppage for medical reasons.

The result of a medical examination is a mere snapshot and moreover, in numerous cases, asymptomatic carriers of pathogenic agents are not detected during such examinations. A medical certificate which is issued three-yearly is therefore not meaningful.

A medical examination on entering employment could however prove judicious e.g. to determine the presence of antibodies against hepatitis A virus or to identify chronic carriers of e.g. *Staphylococcus aureus*. Moreover, the risk of spreading hepatitis A virus can be reduced if persons handling foodstuffs are seropositive, due either to previous infection or vaccination. A medical examination before resumption of work following a stoppage for medical reasons and which is solely based on the absence of symptoms, is insufficient. It is also important to take into account a reference period for incapacity to work for medical reasons, this being specific for each pathogenic agent. A medical examination is also judicious in the context of the detection of the source of an outbreak.

Regulation (EC) N° 852/2004, appendix II, chapter VIII states that sick persons may not handle foodstuffs. SciCom and SHC consider that application of this Regulation may provide better protection against food contamination by carriers of foodborne pathogens.

Both employer and employee are responsible for limiting the transmission of microbiological hazards to foodstuffs. In the framework of the application of good hygiene practices (GHP) in the food and catering sector, persons concerned should receive appropriate training.

Conclusions

SciCom and SHC support revocation of the legal requirement to provide a three-yearly medical certificate. A medical examination to identify chronic carriers (e.g. of *Staphylococcus aureus*) starting a job is judicious in function of the specific circumstances (namely the probability of transmission to foodstuffs and further growth in these foodstuffs). A medical examination is judicious in the context of an outbreak as a means of tracing its source.

Application of GHP and hepatitis A vaccination are the main risk mitigation measures. It is a prerequisite for persons handling foodstuffs in the food sector to receive regular and appropriate training.

Raising awareness of the risks of handling food among the general public, food handlers, operators and medical staff, is seen as more important than providing three-yearly medical certificates to food handlers.

Recommendations

SciCom and SHC underline the importance of raising awareness in practice of persons coming in contact with foodstuffs as well as operators and medical staff. It is recommended to update the brochures of the FASFC and the SHC as well as the relevant self-checking guides. A regular training must be provided for persons coming in contact with foodstuffs. SciCom and SHC recommend strongly to only allow persons with hepatitis A antibodies to come in contact with foodstuffs.

The full text is available on this website in dutch and in french.