

Microbiology - Changes to regulation 2073/2005 and FCD criteria



Regulation (EC) no. 2073/2005 defines process safety and hygiene criteria applicable to certain foodstuffs.

Regulation 2024/2895 has amended regulation 2073/2005 concerning the criterion for *Listeria monocytogenes* in ready-to-eat foods (other than those intended for infants or for special medical purposes). The criterion now applies to the entire shelf-life of such foodstuffs where the food business operator has been unable to demonstrate that the level would not exceed 100 CFU/g for the entire shelf-life of the foodstuffs.

This regulation will apply from July 1, 2026.

As the criteria set out in regulation 2073/2005 are not sufficient to enable the processes used by suppliers to be monitored, a number of production and processing trade associations have proposed, within the framework of their interprofessional bodies, process hygiene criteria applicable to the manufacturing and SLED/UOLED stages.

These proposals were taken on board by the FCD (Fédération du Commerce et de la Distribution) working group to develop additional criteria.

CHANGE IN CRITERIA ON 01/01/2025 :

Microbiological criteria applicable from 2025 to private labels, first-price brands and raw materials in their initial industrial packaging:

- In point 4, addition of **standard NF EN ISO 15213-2** for *clostridium perfringens* and indication that standard NF EN ISO 7937 can be used until 12/31/2025.
- A new point 7 has been added: **pH and aw values for products handled in stores**. These values must be supplied to retailers to define secondary shelf lives and categorize the product in accordance with regulation (EC) no. 2073/2005.
- The heading of the MP/MDD LS criterion has been changed to DLC/DLUO Distribution(D). The **DDM** has replaced the DLUO.
- The comment on *listeria monocytogenes* has been modified. The residual shelf life has been modified by **the shelf life (DLC or DDM)** for categories 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.12, 5.4, 5.5, 5.6, 5.7, 5.8, 6.1, 6.2, 6.6, 6.7, 6.8, 6.10, 6.11, 6.12, 6.13, 6.15, 6.16, 7.1, 7.2, 7.5, 8.1, 8.2, 8.3, 8.4, 8.5, 9.2, 9.3, 9.4, 9.6, 9.7, 9.9, 9.11, 10.8 and 11.9.
- The 1,000 and 10,000 CFU/g enterobacteria criterion has been replaced by the **500 CFU/g E.coli criterion** for cuts 10.5, 10.6 and 10.7.
- A clarification has been made for **categories 2.7 and 2.8**. They have been split into two, to take account of **heat-treated and non-heat-treated products**. Different criteria apply to **aerobic flora at 30°C, yeasts and molds, and E.coli**.

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Categories	Old commodity name	New product name with addition or clarification	Applicable criteria
2. EPICERIE	7. Dried fruits such as smoked/roasted/salted seeds, dried fruits such as papaya chips, bananas, apples and nuts	7. Nuts (walnuts, hazelnuts, peanuts, etc.), non-rehydrated dried fruits (papaya chips, bananas, apples, etc.) and smoked/ roasted/ salted seeds The criteria concern heat-treated products.	Escherichia coli: 10 CFU/g instead of enterobacteria at 10 CFU/g Bacillus cereus: 1,000 CFU/g instead of 100 CFU/g
2. EPICERIE	7. Dried fruits such as smoked/roasted/salted seeds, dried fruits such as papaya chips, bananas, apples and nuts	8. Nuts (walnuts, hazelnuts, peanuts, etc.), non-rehydrated dried fruits (papaya chips, bananas, apples, etc.) and smoked/roasted/ salted seeds Criteria apply to non-heat-treated products.	Aerobic flora 30°C: 500,000 Molds: 50,000 Yeasts: 25,000 Escherichia coli: 100 Bacillus cereus 1,000 CFU/g
2. EPICERIE	8. Soft (rehydrated) or fleshy (not rehydrated) dried fruits such as apricots, prunes, figs, dates, raisins, gojis, cranberries.	9. Soft, fleshy rehydrated dried fruit (apricots, prunes, figs, dates, raisins, gojis, cranberries, etc.) Criteria apply to heat-treated products.	Escherichia coli: 10 CFU/g instead of enterobacteria at 10 CFU/g Bacillus cereus: 1,000 CFU/g instead of 100 CFU/g
2. EPICERIE	8. Soft (rehydrated) or fleshy (not rehydrated) dried fruits such as apricots, prunes, figs, dates, raisins, gojis, cranberries.	10. Soft, fleshy rehydrated dried fruit (apricots, prunes, figs, dates, raisins, gojis, cranberries, etc.) Criteria apply to non-heat-treated products.	Aerobic flora 30°C: 500,000 Molds: 50,000 Yeasts: 25,000 Escherichia coli: 100 Bacillus cereus 1,000 CFU/g
5. CHEESE	5. Unripened cheese made from pasteurized milk, such as fromage frais, including fromage frais...	5. Unripened cheese made from pasteurized milk, such as fromage frais including cottage cheese or mozzarella...	No change to the criteria applicable to this category

Microbiological criteria applicable from 2025 to the manufacture, preparation, cutting or simple handling of unpacked foodstuffs in "cut-to-size" departments and in store workshops:

- Addition of standard NF EN ISO 15213-2 for clostridium perfringens and indication that standard NF EN ISO 7937 can be used until 12/31/2025.
- Modification of the criterion for Bacillus cereus for category E.2.3 delicatessen products with main component (based on) cooked starch or vegetable (excluding bread) sold cold (on sale) (E.2.3). The criterion is raised from 100 to 500 CFU/g.

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CHANGE IN CRITERIA ON 01/01/2024 :

Microbiological criteria applicable from 2024 to private labels, first-price brands and raw materials in their initial industrial packaging:

- In Part 4 – Microbiological analysis methods, the crossed-out section has been removed: One-box in-house methods are accepted for microorganisms and specific matrices for which a study has been carried out, except for criteria derived from regulation no. 2073/2005.
- The *Listeria monocytogenes* criterion has been added to the "olives not subjected to heat treatment" category
It is indicated as **not detected/25g** in accordance with EU regulation 2073/2005 and at distribution reception, and is fixed at **100 CFU/g** at distribution DLC/DDM.
- The following comment has been added for sterilized and UHT dairy products:
The UHT treatment is carried out by a treatment sufficient to ensure the microbiological stability of the products after *an incubation period of fifteen days at 30°C or seven days at 55°C in a closed container or after the implementation of any other method demonstrating that the appropriate heat treatment has been applied (EC regulation n°853/2004).*
- DGAL instruction 2019-486 has been replaced by DGAL instruction 2023-117 concerning vibrio pathogens in fishery products and live shellfish.
- *Vibrio* pathogens and *Listeria monocytogenes* have been added to category "6. Frozen raw bivalve mollusks (with or without shell) and fresh shucked raw bivalve mollusks".
- The vibrio pathogen criterion has been added to the "9. Live shellfish.
- Some product names have been changed:

Categories	Old commodity name	New product name with addition or clarification
2. EPICERIE	7. Dried fruits such as smoked/roasted/ salted seeds and dried fruits such as papaya chips, bananas, apples	7. Dried fruits such as smoked/roasted/salted seeds, dried fruits such as papaya chips, bananas, apples and nuts
2. EPICERIE	8. Soft dried fruit Apricots, prunes, figs, dates, raisins	8. Soft (rehydrated) or fleshy (not rehydrated) dried fruits such as apricots, prunes, figs, dates, raisins, gojis, cranberries.
2. EPICERIE	10. Condiment sauces	10. Mayonnaise, light mayonnaise, variety sauces (spice base, aromatic, mustard, horseradish)* with ph

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Categories	Old commodity name	New product name with addition or clarification
6. TIDE	6. Raw scallops, shelled, fresh or frozen	6. Frozen raw bivalve mollusks (with or without shell) and shucked raw bivalve mollusks
6. TIDE	8. Cooked or pre-cooked shelled shellfish (including shrimp tails)	8. Cooked or pre-cooked, fresh or frozen shelled mollusks, crustaceans and cephalopods (including shrimp tails)
6. TIDE	14. Marinated octopus, seafood cocktail pH 4.4 to 5.2	14. Marinated octopus, raw seafood cocktail, fresh or frozen pH 4.4 to 5.2

- Modification of the number of DGAL instruction 2019-486 to DGAL 2023-117 concerning vibrio pathogens in fishery products and live shellfish.
- Modification of category name 6.6 :
Fresh or frozen raw shelled scallops replaced by Frozen raw bivalve mollusks (with or without shell) and fresh shelled raw bivalve mollusks.
- Addition of Vibrio pathogens and Listeria monocytogenes criteria to this category 6.6.
- Pathogenic Vibrio criterion added to category 6.9 Live shellfish.
- Modification of the Listeria monocytogenes criterion in category 8.5 olives not subjected to heat treatment.

Microbiological criteria applicable from 2024 to the manufacture, preparation, cutting or simple handling of unpacked foodstuffs in "cut-to-size" departments and in store workshops:

- In part 3- Microbiological analysis methods and sampling, the crossed-out section has been removed: One-box in-house methods are accepted for specific microorganisms and matrices for which a study has been carried out (and submitted to COFRAC for validation), except for criteria derived from regulation no. 2073/2005.

- The criterion Listeria monocytogenes has been added to the following categories:

E.1.7 Olives: **100 CFU/g**

E.3.1 Sandwich with raw deli meats: **100 CFU/g**

E.3.2 Sandwich with raw milk cheese: **100 CFU/g**

E.3.3 Other cold sandwich: 100 UFC/g

I.1.1 Dry surface after cleaning: **Not detected/surface**

- Modification of category E.1.7 Olives to note the listeria monocytogenes/25g criterion.