

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 1, 2, 3, 5.1, 5.2, 6, 7, 8, 9, 10, 11, 12, 13

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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Comments of the East African Community (EAC)

The EAC appreciates the opportunity to provide comments on different agenda items to be discussed by the 54th Session of the Codex Committee on Food Hygiene (CCFH54). The following are the comments from the EAC for consideration.

Agenda Item 1: Adoption of the Agenda (CX/FH 24/54/1)

The EAC supports the adoption of the Provisional Agenda items as circulated.

Agenda Item 2: Matters referred by the Codex Alimentarius Commission and/or other Codex Subsidiary Bodies to the Committee (CX/FH 24/54/2)

The EAC takes note of matters arising from 46th sessions of the Codex Alimentarius Commission (CAC46) and its executive committee (CCEXEC84, and CCEXEC85) and other Codex Subsidiary bodies relating to the Codex Committee on Food Hygiene such as the request of CCMAS42, and notes issues raised by CCFL47.

Agenda Item 3: Matters arising from the Work of FAO and WHO (including JEMRA) (CX/FH 24/54/3)

The EAC takes note of the matters arising from the work of FAO and WHO including those from JEMRA. Notably the operationalization of sharing of laboratory and epidemiological data, nationally, regionally, and internationally will improve the understanding and control of foodborne viruses. In addition, there is a need for member countries to develop regulatory frameworks that will enhance data sharing and protection

Agenda Item 5.1: Guidelines for the Control of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef, Fresh Leafy Vegetables, Raw Milk and Raw Milk Cheeses, and Sprouts (CXG 99-2023): Proposed draft Annex II on Fresh Leafy Vegetables (CX/FH 24/54/5)

The EAC thanks the EWG chaired by Chile and co-chaired by New Zealand, Kenya, and USA for this work. It further supports that the proposed draft Annex 2 on Fresh Leafy Vegetables to be advanced in the Codex Step process

Para 4

Editorial comment: The EAC proposes an editorial amendment by addition of 'for' to the last statement in the para to read '

"The objective of this Annex is to provide guidance to reduce the risk of foodborne illness from STEC associated with fresh leafy vegetables intended for human consumption without cooking, during primary production, harvesting, packing, processing, storage, distribution, marketing, and **for** consumer awareness."

Rationale: The addition of for in the statement brings clarity.

Para 17

Editorial comment: The EAC proposes an editorial amendment to where references are used with the **removal of brackets** in the last statement.

...~~(Refer to section 3.2.1.1.3 of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CXC 53-2003).)~~"

Rationale: For consistency within the document

Para 18

Editorial comment: The EAC proposes an editorial amendment to the para to read:

...STEC can persist in these materials for weeks or even months if treatment is inadequate. **Anaerobic digestion and** ~~G-composting~~ can be effective in controlling STEC in manure, depending on factors that include time, temperature, indigenous microorganisms, moisture, **compost** composition ~~of the compost~~, pile size, and turning of the pile. ~~Another manure treatment method involves anaerobic digestion.~~ Treatment methods should be validated to inactivate STEC. Refer to section 3.2.1.2 of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CXC 53-2003) for practices to minimize contamination of fresh leafy vegetables with microbial pathogens such as STEC in manure, biosolids, and other natural fertilizers.

Rationale: Anaerobic digestion is one of the manure treatment methods

Para 22

Editorial comment: The EAC proposes an editorial amendment to the para with sentence three inserted in between statements 1 and 2 to read:

Fresh leafy vegetables should be stored and transported under conditions that will minimize the potential for STEC contamination and/or growth and noting that containers are often open-topped and stacked. **When vehicle receptacles or containers have been used for the transport of products other than fresh leafy vegetables, effective cleaning and disinfection should be carried out between loads to avoid cross-contamination.** Fresh leafy vegetables should not be transported in vehicles previously used to carry potentially contaminated materials (e.g., heavily soiled root vegetables, live animals, animal manure, compost, or biosolids). ~~When vehicle receptacles or containers have been used for the transport of products other than fresh leafy vegetables, effective cleaning and disinfection should be carried out between loads to avoid cross-contamination.~~

Rationale: For Clarity and flow

Para 26

Editorial comment: The EAC proposes that all wording after recorded be deleted to avoid repetition since the wording in the square brackets imply the same thing

Para 27

Editorial comment: The EAC suggests to delete 'in wash water'. The text will now read as follows:

The washing of fresh leafy vegetables should follow good hygienic practices (GHPs) to prevent or minimize the potential for the introduction or spread of STEC ~~in wash water~~

Rationale: To align with the rest of the texts

Para 30

Editorial comment: The EAC proposes an editorial amendment to the para by deleting 'es' from the word illness

Rationale: The subject matter is the risk rather than the types of illnesses that can occur.

Para 31

Editorial comment: The EAC proposes an editorial amendment to the para by deletion of the first "**cutting**" from the statement

Rationale: For clarity, knives are cutting tools

Para 32

Editorial comment: The EAC proposes an editorial amendment to the para by replacing 'for' with 'in' and deletion of 'see' and replace it with 'Refer to' in the statement to read.

Washing and removal of water/drying are important steps in the control of STEC ~~in for~~ fresh-cut leafy vegetables. See **Refer to** Section 4.3 above...

Rationale: For consistency

Para 44

Editorial comment: The EAC proposes an editorial amendment by addition of a **colon** at the end of the para to read...

Fresh leafy vegetables (intact and pre-cut) should be held at an appropriate temperature to minimize growth of STEC. Cross-contamination from or to other food items should be prevented. Food business operators serving fresh leafy vegetables for consumption without cooking to consumers should take appropriate measures to:

Figure1: Process Flow for Fresh Leafy Vegetables

Technical comment 1: The EAC proposes the inclusion of production site selection as a process step before soil preparation

Rationale: Environmental factors surrounding the production site may have an effect on the safety and quality of the final product. Further, subsequent interventions would not be sufficient to fully remove STEC contamination that occurs during primary production.

Technical comment 2: The EAC also notes that the EWG report had indicated that the word '**dewatering**' be replaced with '**removal of water**' which has not been effected in the flow diagram

Agenda Item 5.2: Guidelines for the Control of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef, Fresh Leafy Vegetables, Raw Milk and Raw Milk Cheeses, and Sprouts(CXG 99-2023): Proposed draft Annex IV on Sprouts (CX/FH 24/54/6)

General comment: The EAC appreciates the work done by the EWG, chaired by Chile and co-chaired by New Zealand, Kenya, and USA and proposes that the draft Annex 4 on Sprouts be advanced in the Codex Step process with the inclusion of the following comments

Para 6

Editorial comment: The EAC proposes editorial amendment to para by replacing '~~addressing~~' with '**for**'.

Rationale: For clarity and emphasis

Para 43

Editorial comment: The EAC proposes a proper numbering of para 43 since it is repeated as para 42 and the subsequent numbering to change throughout the whole document

Para 44

Editorial comment: The EAC proposes editorial amendments to para by deleting '~~with fit for purpose water~~' in para44 to read.

...Repeat the process ~~with fit for purpose water~~ until the dirt or debris are removed and rinse water remains clear.

Rationale: The process of repeating is already captured in the first sentence.

Scope

Technical comment: The EAC takes note of the application of the scope where microbicidal treatment is not allowed yet at section 5.4 Treatment and pre-germination soak of seeds for sprouting, allows the use of chemical methods in para 47 and other Physical treatments in para 48 which are microbicidal. EAC, therefore seeks clarification on the same as it lacks consistency

Section 9

Editorial comment: The EAC proposes that the bullet under Training in section 9 should be given an independent number and the word 'nature' added to read:

All personnel involved in the production and handling of seeds for sprouting or sprouts across the supply chain should receive training on the principles of food hygiene and food safety, in particular the high-risk **nature** of sprouts and the illness associated with them, as well as personal health and hygiene requirements.

Rationale: For the flow of the sentence

Para 78

Editorial comment: The EAC proposes that 'and recorded' be added to para 78 to read:

...Temperatures should be monitored **and recorded**

Rationale: Indicates the evidence of monitoring

Para 80, Figure 1: Sprouts flow diagram

Technical comment: The EAC seeks clarification on the meaning of **deposit** in the flow diagram

Agenda Item 6: Guidelines for the Safe Use and Reuse of Water in Food Production (Annex II on Fishery Products at Step 4 and Annex III on Dairy Products at Step 4) (CX/FH 24/54/7)

General comment: The EAC appreciates the effort of the EWG chaired by the European Union to develop this guideline and the annexes and agrees with the proposed draft Annex IV on Technologies for the recovery and treatment of water for reuse and appropriate to maintain it. Annex IV gives provisions for options for technologies for the recovery and treatment of water for reuse.

Para 17, page 3, CCFH54 is invited to consider:

- i. the proposed draft Guidelines as presented in Appendix I: Annexes II to IV, respectively on "Fish and Fishery Products", "Production of Milk and Milk Products" and "Technologies for recovery and treatment of water for reuse", and provide their inputs; and

General comment: The EAC thanks the EWG Chair and fellow co-chair for this work well done. The EAC agrees with the proposed draft Annex IV on Technologies for the recovery and treatment of water for reuse and appropriate to maintain it. Annex IV gives provisions for options for technologies for the recovery and treatment of water for reuse.

- ii. **specifically provide input on the following:**
 - a) **whether you agree with the proposed new Annex IV and consider it appropriate to maintain it.**
Comment: The EAC supports the proposed new Annex IV and consider it appropriate to maintain it.
 - b) **if the proposed Annex IV is maintained:**
 - **whether you consider a restricted revision of the General Section appropriate with the purpose to introduce a cross-reference to this new Annex IV; and**

Comment: The EAC supports to consider a restricted revision of the General Section appropriate with the purpose to introduce a cross-reference to this new Annex IV

- **whether you consider a restricted revision of the Annex I on Fresh Produce appropriate with the purpose to introduce a cross-reference to this new Annex IV and indicate which technologies are most relevant for Annex I.**

Comment: The EAC supports to consider a restricted revision of the Annex I on Fresh produce appropriate with the purpose to introduce a cross-reference to this new Annex IV and indicate which technologies are most relevant for Annex I

Para 18, page 3

General comment: The EAC proposes that these Annexes are advanced in the Codex step process with the inclusion of the comments submitted.

Appendix I

Annex II: Fish and Fishery Products

Section 4 (definition), para 10 and 11

Editorial comment: The EAC proposes replacement of '**See**' with '**Refer**' in para10 and 11 in definitions.

Para 16

Editorial Comment: The EAC proposes in the **last bullet**, replace “don’t ” with “**shouldn’t**” in the last sentence

Para 16, bullet two

Technical Comment: The EAC seeks clarification on this bullet

“Seawater known to have with high salinity and free from particulate material will increase seawater quality prior to treatment, since the level of presence of naturally occurring marine microorganism are associated with temperature and salinity as well as sediments”

Para 18

Technical comment: The EAC seeks clarification for the use of **term non-potable water in** codex text as used in this para. The EAC further proposes that the definition for non-potable water is defined if it's to be used

Para 26

Technical Comment: The EAC proposes that the existing statement be modified and include other quality tests such as chemical contaminants

Rationale: Chemical contamination is likely to be a source of contamination given that treated water is derived from wastewater and hydroponics

Annex III: Production of Milk and Milk products

Para 19

Editorial Comment: The EAC proposes an editorial amendment in the second sentence, add “s” to” it” between after and first to qualify it into “it**s**”

Para 29

Editorial comment: The EAC proposes rewording as given for purposes of consistency by deleting “of” and replacing it with a comma

RO water recovered from permeates ~~of~~, for-example whey or water mixtures resulting from equipment and pipeline flushes typically has very low microbial counts. When the performance efficiency of RO has been subjected to a hazard analysis and validated, and is verified to be consistent, RO water may be used for the following purposes within approximately 24 hours after generation without additional microbiocidal treatment for example:

Para 40, bullet 2

Editorial comment: The EAC proposes to add “should” in the statement.

All tanks, piping for the storage, treatments, and distribution system for (reuse) water in the plants and facilities, should be designed for CIP and **should** be able to withstand heat or cold exposure as needed, as well as extreme pH values.

Rationale: EAC agrees with this proposal for clarity

Para 66, third line

Editorial comment: The EAC proposes the replacement of providing with **provided** for clarity and flow

Para 69, Figure 4 (Scheme shows the recirculation of water used for cooling cheeses)

Editorial comment: The EAC seeks clarification for an **unexplained question mark** and footnote which is not clear.

Annex IV: Technologies for recovery and treatment of water for reuse

Para 6

Editorial comment: The EAC proposes amendment as demonstrated below and seeks clarity why there only exists a closing square bracket yet the opening is missing. To read

RO is a membrane filtration technology, widely used in dairy manufacturing plants, in which water is forced under high pressure (e.g.31-60 bar) through a small (~~e.g. 1.0 to 0.1 nm~~) pore-size membrane (**e.g. 1.0 to 0.1 nm**) from the retentate side to the permeate side. The main purpose of RO is to remove nutrients and chemicals from water, but secondarily it also reduces levels of bacteria and viruses.}]

Rationale: For clarity and flow

Para 12, bullet one

Editorial comment: The EAC proposes the interchange of “if even” to “even if” in the statement to read: transmission of UV light, i.e. the level of turbidity in the water; ~~if even~~ **even if** slight turbidity/cloudiness in the water, the use of UV light may be ineffective as a microbiocidal treatment;

Para 15

Editorial Comment 1: The EAC proposes an editorial amendment on the para, **third bullet**, to delete “be” between may and buildup to correct the editorial error.

To read: resistance among microorganisms to disinfectants may ~~be~~ build up; this can be counteracted by change of disinfectants after a certain period of use;

Para 15, last bullet

Editorial Comment 2: The EAC proposes the opening of brackets for clarity by deleting the curl brackets

General comment: The EAC appreciates the work done by the Electronic Working Group chaired by Japan and co-chaired by Chile and recommends the document to be advanced in the Codex Step Process. The EAC proposes the editorial amendments of the document as captured in various specific Sections.

Appendix I

Para 12

Editorial comment: The EAC supports the adoption of the amendments made in Para 12 but also proposes that rather than deleting “thoroughly” in the sentence it should be replaced with “fully”

Rationale: To define the extent of the treatment

Section 5.6: Management and Supervision

Editorial comment: The EAC proposes the deletion of section 5.6 on management and supervision since the subsection beneath it, has been deleted

Agenda Item 8: Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food at Step 4 (CX/FH 24/54/9)

General comment: The EAC recommends the document to be advanced in the Codex Step process

Para 8, concerning the EWG report and requests on the following issues.

- **Whether the title should be retained as “Guidelines for food hygiene control measures in traditional markets for food” or changed to “Guidelines for hygiene control measures in traditional markets for food”**

Technical comment: The EAC proposes to adopt the first option of “Guidelines for food hygiene control measures in traditional markets for food”

Rationale: This preference is based on the understanding of the multifaceted nature of hygiene, which encompasses personal, environmental, domestic, and food hygiene. Among these, food hygiene stands out as the most critical within the context of traditional markets, defined All conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain

- **Whether the structure and headings capture all the key issues to be addressed;**

Comment: The EAC notes that the structure and headings capture and address all the key issues.

- **Whether there are any other issues to be covered by the guidelines; and**

Para 5.3.4

Editorial comment: The EAC proposes that the word “simple” is replaced with “friendly” in the statement for clarity, as it is easily understood

Para 7.4.11

Technical comment: The EAC proposes that the word “should” where it appears in this clause be replaced by a “shall”

Rationale: Food handlers must avoid touching money since its one of the drivers of food contamination

- **Considering the request of CAC46 to carefully consider the relationship between these guidelines and the existing four regional Guidelines/Codes of Hygienic Practice related to street food (e.g., CXG 22R-1997, CXC 43R-1995, CXC 71R-2013, CXC 76R-2017), whether these guidelines might be considered as complementary to or replacement for those existing texts.**

Technical comment: The EAC proposes that the guidelines be used in conjunction with the other four

regional Guidelines/Codes of Hygienic Practice related to street food (e.g., CXG 22R-1997, CXC 43R-1995, CXC 71R-2013, CXC 76R-2017)

Para 10, page 2

The EAC supports for the guideline be progressed to the next Codex steps

Agenda Item 9: Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (CXC 1-1969) (CX/FH 24/54/10)

General comment1: The EAC notes that the discussion paper is in good faith and it gives guidance on the alignment of codex texts, and uniformity of structure, and facilitates cross-referencing where necessary.

General comment 2: The EAC takes note of the three options: option 1 is simple and offers drafters room to tailor the subheadings to the specific area of focus, however, this flexibility may pose a challenge in text alignment; Option 2 gives clear elaboration of the texts structurally, similar to Option 3; and, Option 3, in addition also offers both technical and structural alignment. However, some of the guidelines may have unique structures and can be exempted from the three options. Therefore, EAC proposes the implementation of **Option 3** for alignment of all current and future CCFH texts where applicable.

Q1

Technical comment: The EAC proposes the adoption of option A

Rationale: A simple cross reference to the General Principles of Food Hygiene (CXC 1-1969) is included to maintain alignment of headings.

Q2

Technical comment: The EAC proposes to consider a simple cross reference to Section 7 of CXC 1-1969

Q3

Technical comment: The EAC notes that a simple cross-reference is sufficient

Rationale: Elaboration in this section is adequate

Q4

Technical comment: The EAC proposes the adoption of a simple reference to CXC 1 1969

Rationale: The text in CXC 1 1969 is adequate to take care of other illnesses that could be as a result of other biological hazards.

Q5

Technical comment: The EAC proposes the adoption of the alignment work to list out each sub-heading in such sections and provide a specific cross-reference to CXC 1-1969 in each case rather than the single cross-reference to the main section is sufficient

Rationale: It gives a better guide to the user

Q6

Technical comment: The EAC proposes that it is necessary to ensure alignment with the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023) which was adopted at the 46th session of the Codex Alimentarius Commission

Q7

Technical comment: The EAC proposes the adoption of option 2

Rationale: It provides better guidance and would be more user friendly

Q8

Technical comment: The EAC proposes that the alignment process should be streamlined to include only references relevant to the section of the CXC 1-1969 unless there are additional details relevant to individual guidelines

Rationale: To align the text and avoid repetitions.

Q9

Technical comment: The EAC proposes the adoption of option 2

Rationale: Since there is an already existing EWG, it will make the alignment of text easier.

Q10

Technical comment: The EAC proposes the approach of prioritizing text to be based on age and current/emerging issues of importance.

Rationale: This is a systematic approach that takes into account emerging and pressing issues.

Agenda Item 10: Revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012) (CX/FH 24/54/11)

General comment: The EAC appreciates Canada and the Netherlands for the preparation of this project document. They have considered the requests of CCFH53 as well as the output of the JEMRA meeting and other available information and recommend this new work on the revision of the guidelines (***Revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012)***) for approval by CAC47.

Agenda Item 11: Discussion Paper on the Revision of Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011) (CX/FH 24/54/12)

General comment: The EAC appreciates the USA, Honduras, Brazil, and New Zealand for the preparation of this project document. In light of the latest scientific information as well as the recommendations from the JEMRA meetings, EAC supports the project document to undertake new work to revise and update the appropriate text in CXG 78-2011. EAC notes that the new work will consider factors relevant to the control of Campylobacter and Salmonella in chicken meat among others whose importance cannot be understated.

Agenda Item 12: Discussion Paper on the Revision of Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007) (CX/FH 24/54/13)

General comment: The EAC appreciates Canada, France, and the United States of America for the preparation of this discussion paper on the revision of '***Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007)***'. EAC therefore recommends that this new work on the revision of the guidelines be considered by CCFH54. EAC further notes that the revision of this standard as proposed in this project document will address new notable outbreaks, advances in technology, and varying practices among others.

Agenda Item 13: Other Business and Future Work - New Work / Forward Workplan (Proposals in Reply to CL 2023/30-FH)

General comment: The EAC appreciates the United States of America for the preparation of this discussion paper on New work/Forward workplan (Proposals in reply to CL 2023/30-FH). EAC notes the guidance given in this project document as well as the new work items that are currently underway. EAC appreciates that the forward workplan is inline with the ***Process by which the Codex Committee on Food Hygiene (CCFH) will undertake its work***. EAC supports the New work/Forward workplan as envisioned in the project document.