

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 6, 7 and 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
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Comments from the African Union (AU)

**AGENDA ITEM 5: CX/FH22/52/5 DRAFT GUIDANCE FOR THE MANAGEMENT OF BIOLOGICAL
FOODBORNE OUTBREAKS**

General Comments

African Union congratulates Denmark, Chile and the European Union for leading work on the Guidance for the Management of Biological Foodborne Outbreaks. AU recognizes that biological foodborne outbreaks can have significant impact on public health with far reaching socio-economic costs, hence the need to manage these outbreaks using sound scientific evidence. The document contains important science-based guidance and best practices recognized internationally for the management of biological foodborne outbreaks. African Union welcomes the progress that have been made so far on progressing the draft Guidance. African Union therefore supports the decision for CCFH52 to recommend to the Commission to adopt the guidance at Step 8.

**AGENDA ITEM 6: CX/FH 22/52/6, PROPOSED DRAFT DECISION TREE (REVISION OF THE GENERAL
PRINCIPLES OF FOOD HYGIENE (CXC 1-1969))**

Position: African Union thanks Brazil, Honduras, Jamaica and Thailand for chairing the discussions on the draft CCP decision tree to be included in the General Principles of Food Hygiene (CXC 1-1969). African Union supports the integration of “Example of a CCP Decision Tree” in CX 1-1969. The CCP decision tree is a useful tool that helps to decide whether a hazard control point is a critical control point or not and will be useful during hazard analysis process. We find the CCP decision tree to be a logical method as it is based on sequential questions to determine CCPs.

On the question of the CCP decision tree and the CCP determination worksheet that would fit as “Example of a CCP Decision Tree” or “Example of a CCP determination worksheet” in Annexes 1 and 2 respectively, AU recognizes that both a useful templates to facilitate decision making hence CCFH should be flexible to include both proposals which can be used depending on preferences of users.

**AGENDA ITEM 7: CX/FH 22/52/7, PROPOSED DRAFT GUIDELINES FOR CONTROL OF SHIGA TOXIN-
PRODUCING ESCHERICHIA COLI (stec) IN BEEF, RAW MILK AND CHEESE PRODUCED FROM RAW
MILK, LEAFY VEGETABLES AND SPROUTS**

Para.3, line 1.

Comments: the sentence beginning with, historically ‘*STEC illnesses*’ should read “illnesses caused by STEC”.

Rationale: Editorial to improve readability.

Definition of raw beef Par. 21

Comments: African Union proposes amendment to the definition of raw beef to include meat from other species in line with international nomenclature.

Rationale: The current definition is restrictive and excludes meat from other species whose meat is also recognized as beef.

Para.43, word in bracket “primary”

Position: Retain the word ‘primary’ in the document but replace industry with food business operators (FBO).

Rationale: Food Business Operator (FBO) has already been defined and widely used in the General Principle of Food Hygiene document. Hence to ensure consistency, AU recommends to replace Food Industry with FBO.

Section 10.3.2, par. 45 regulatory systems: whether to use the word ‘should’ or ‘could’.

Position: African Union supports the use of “should” rather than “could”. The requirement should read
*The competent authority **should**, provide guidelines and other implementation tools to industry, as appropriate, for the development of the process control systems.*

Rationale: The main role of the competent authority is to control and verify whether operators comply with the requirements set by the competent authorities. This is supported by “General Principles of Food Hygiene” CXC 1-1969, which notes that: “*Competent Authority is the government authority or official body authorized by the government that is responsible for the setting of regulatory food safety requirements and/or for the organization of official controls including enforcement*”. Therefore, the competent authority should provide the industry with guidelines and other implementation tools allowing the establishment of process control systems.

Para. 32- bracketed temperature of [7 °c or below]:

Comment: Delete the bracket and include the temperature in the text.

Rationale: Temperature limit is important guidance for the control of STEC.

Annexes with a view to providing overarching comments to facilitate their completion, in particular on the completeness of Annex 1 on Raw Meat;

the definition of vegetables of a leafy nature, retention of certain elements (e.g. Section 11 Retail and Food service and Flow charts) in Annex 2 on Fresh Leafy Vegetables; and on the structure of Annex 3 on Raw Milk and Raw Milk Cheeses

Position: African Union supports the retention of Section 11: Retail and Food service and Flow charts in Annex 2 on Fresh Leafy Vegetables. The retail and food service and Flow charts provide useful information for implementation.

We consider Annex 1 on raw meat as well structured and provides useful information on measures that can reduce contamination of raw beef with STEC.

On the Annex 3 dealing with raw milk and raw milk cheeses, we consider that the technical content in this Annex is relevant, however, we recommend that the structure of the document should be reviewed with the view to using a structure similar to the one in the raw meat document.

The definition of Fresh leafy vegetables –

Vegetables of a leafy nature [where the leaf is intended for consumption] or [that may be consumed]

Position: African Union supports the following definition: Vegetables of a leafy nature where the leaf is intended for consumption.

Rationale: To ensure consistency with the definition in the " Code of Hygienic Practice for Fresh Fruits and Vegetables: CXC 53-2003 which specifies that: “Fresh leafy vegetables include all vegetables of a leafy nature where the leaf is intended for consumption “.

Paragraph 66 line 1, the use of the term vector

Comments: Replace the term vector with vehicle. The sentence should read as follows:

The number of foods identified as a ~~vector~~ **vehicle** for STEC transmission has increased over time.

Rationale: Technically, vectors are biological organisms.

AGENDA ITEM 8: CX/FH/22/52/8, PROPOSED DRAFT GUIDELINES FOR THE SAFE USE OF WATER IN FOOD PRODUCTION STEP 4.

General Comments

African Union thanks the Electronic Working Group chaired by Honduras and co-chaired by Chile, Denmark, European Union and India for leading work on the proposed draft guidelines for the safe use of water in food production. African Union continues to support this work given the fact that water can be a vehicle for the transmission of many diseases or contamination. Water is an important input in the food chain and remains an essential commodity through all stages from primary production to consumption. Whether used directly as an ingredient or indirectly (washing, cooling or cleaning contact surfaces), judicious use of safe and quality water is critical to ensure public health and sustainability of food production. It is in this regards that AU supports the use of risk-based approaches and assessment of the fitness of the water and the development of science-based microbiological criteria for water sourcing use and reuse.

Para. 16-whether the term ‘potable’ rather than ‘drinking water’ should be used throughout the document.

Position: African Union supports the use of ‘potable water’ throughout the document.

Rationale: Drinking water (according to WHO) is water that is used for direct consumption by a person, or for various usual domestic uses, in particular for drinking, for the preparation of meals and for personal hygiene. It does not include water used for food production. Potable water has a broader meaning given that it is based on its character of potability and without specifying its particular use. Potable water can mean, in addition to water intended for personal and domestic use, water used in the processing of food products.

Issue related to choice of the most appropriate definitions for fishery products, harvesting and fit for purpose water, from the proposed definitions in section 4.

Position: African Union supports the following definition: ‘Any cold-blooded aquatic animal, or any part or product derived therefrom, intended for food for human consumption, and includes any fish, crustacean, molluscs, echinoderm, holothurian, or aquatic reptile.

Rationale: This definition captures all the products considered as fishery products in international trade.

Issue on the choice of the most appropriate definitions for ‘harvesting’

Position: African Union supports the following definition for harvesting i.e.

....Harvest refers to operations involving taking the fish from the water...

Rationale: This definition is consistent with the definition used in the Code of Practice for Fish and Fishery Product CC 52-2003 in Page 14, 2.1 General definitions, specifies that “*Harvesting Operations involves taking the fish from the water*”.

Consideration on if the information provided in the annex so far is enough or to hold the document until the JEMRA meeting on water use and reuse for fish and fishery products becomes available to include further information.

Position: African Union notes that the input from JEMRA will be vital in the finalization of the Annex on fish and fishery products. In this regard, African Union recommends holding the document until the JEMRA expert meeting on water use and reuse for fish and fishery products becomes available to include all available relevant science-based guidance.