



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

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11 - 15 March 2024

Comments of South Africa

South Africa appreciates the opportunity to provide comments on the different agenda items to be discussed by the 54th Session of the Codex Committee on Food Hygiene.

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

South Africa supports the advancement of Annex II in the Codex Step process. The Guidelines covers various stages from primary production to consumer awareness, emphasizing the importance of control measures and good hygiene practices to minimize contamination and growth of STEC.

Specific comments:

- (a) **Paragraph 5.1 (Figure 1)** – South Africa proposes the addition of “site selection” before soil preparation to better reflect the process flow for fresh leafy vegetables. Choosing an appropriate site for fresh leafy vegetable production is important to ensure optimal soil quality, water availability, etc.
- (b) **Paragraph 22** - South Africa proposes the addition of “where feasible, relative humidity”. The text will now read as follows: Fresh leafy vegetables should be maintained at appropriate temperatures and where feasible, relative humidity, at all times to minimize growth of STEC that may be present”.
- (c) **Paragraph 26** - South Africa supports the second bracketed sentence as it is clearer and effectively conveys the message. It specifies that the biocides should be sufficient to reduce the potential risk of cross-contamination, which is the primary goal when using biocides in water. The text will now read as follows: When biocides are used, the concentration and other appropriate parameters (e.g., pH and temperature) in this water should be controlled, monitored, and recorded to ensure that the biocides are sufficient to reduce the potential risk of cross-contamination.
- (d) **Paragraph 27** - South Africa suggests deleting “in wash water” to improve the clarity and flow of the sentence. 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.

Agenda Item 5.2: Proposed draft Annex IV on Sprouts

South Africa supports advancement of the Annex IV in the Codex Step Process as the document provides comprehensive guidance for the safe production of sprouts, focusing on the prevention of contamination from seed production to the point of sale.

Specific comment: Paragraph 80. South Africa propose the deletion of “contract” and replacing it with “accredited”. The text will now read as follows: For in-restaurant sprouting, interventions recommended for sprout operations to minimize the potential for STEC should be considered, including seed sourcing programs, seed treatment (if appropriate), prevention of cross-contamination, sampling, and testing of spent sprout irrigation water (samples to be tested by accredited laboratories), as well as cleaning and disinfecting food

contact surfaces. For better quality control in testing spent sprout irrigation water. This change ensures that laboratories meet specific standards, making the testing process more reliable and improving food safety measures and is consistent with Codex CCFICS language.

Agenda Item 6: Draft guidelines for the safe use and reuse of water in food production and processing (annexes on water re-use in fish and fishery products (renamed from fishery products) and on the production of milk and milk products (renamed from dairy products)).

South Africa supports the proposed new Annex IV and the restricted revision of the General Section and Annex 1 with the purpose to introduce a cross-reference to the new Annex IV. This will ensure consistency and clarity with regards to Annex IV as a part of the document. South Africa also supports the advancement of Annex II to Annex IV in the Codex Step process.

Agenda Item 7: Proposed draft revision on the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood (CXG 73-2010)

South Africa supports the advancement of the proposed draft revision in the Codex Step process. The revision of these Guidelines strengthens the risk management measures in order to ensure improved public health outcomes and food that is safe to the consumer.

Agenda Item 8: Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food

Specific Comments

- **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”.**

South Africa supports the original title “Guidelines for food hygiene control measures in traditional markets for food”. This choice emphasizes the importance of food hygiene, which is critical for ensuring food safety and quality in traditional markets. It aligns with the principles of the Code of Practice CXC 1-1969 and helps to clearly communicate the guidelines' focus and intent, making them easier to understand and follow in traditional market settings.

- **Whether this set of guidelines should adopt a guidelines structure, CoP structure, or the proposed unique structure.**

South Africa suggests that adopting a guideline structure would be most suitable. This designation inherently implies consistency with the standard structure prescribed by Codex for such documents, reinforcing the document's role as a guiding document.

- **Whether the structure and headings capture all the key issues to be addressed and whether there are any other issues to be covered by the guidelines.**

The structure and headings capture the key issues expected to be addressed, however, South Africa propose a few additional issues that could be considered for inclusion or further elaboration:

- **SECTION 6: LOCATION, DESIGN, LAYOUT, STRUCTURES AND EQUIPMENT** - In Section 6, equipment is included in the content of this section and so should be reflected in the title of the section as well.
- **SECTION 7: FOOD PREPARATION CONTROL** - The appropriate name should be "food preparation control" as this section outlines the requirements and controls necessary for ensuring the safe preparation of food, including sourcing of ingredients, handling, transportation, and the use of additives, etc.

- **Considering the request of CAC46, it's important to carefully assess the relationship between these guidelines and the existing regional guidelines/codes of hygienic practice related to street food. Determine whether these guidelines should be complementary to or a replacement for those existing texts based on stakeholder feedback.**

South Africa proposes that these guidelines should complement existing regional guidelines/codes of hygienic practice related to street food, rather than serve as replacements. The existing regional guidelines are responding to the specific needs of the unique circumstances related to street vended food.

- **Recommend whether the document can be advanced in the Codex Step process.**

South Africa recommends that the proposed document can be advanced in the Codex Step process. Advancing through the Codex step process allows for input from member countries and stakeholders, ensuring that the document reflects a consensus-based approach and is scientifically sound.

Specific Comments

- **Paragraph 5.1.1 - All food handlers in traditional markets for food should undergo daily health checks before handling food as well as a scheduled medical examination and, where necessary be certified and /or immunized.**

South Africa proposes to replace the first sentence with the following sentence: "Food handlers in traditional markets should be in good health without symptoms of disease before handling foods and should report any symptoms to management". Daily health checks and certification may not be practical in such informal settings. Therefore, emphasis should be placed on educating food handlers about communicable diseases and encouraging prompt reporting of symptoms. Consideration should be given to factors such as resources, infrastructure, and the availability of healthcare professionals in determining the appropriate measures for ensuring food safety in traditional markets. The Codex CXC 1-1969 states that personnel known or suspected to be ill or carrying a disease likely to be transmitted through food should not enter any food handling area if there is a likelihood of them contaminating food. Any person so affected should immediately report illness or symptoms of illness to the management. It may be appropriate for personnel to be excluded for a specific time after symptoms resolve or, for some illnesses, to get medical clearance before returning to work.

- **Paragraph 7.1.7 - Maintain traceability and record-keeping systems.**

South Africa proposes the deletion of "maintain" and replacing it with "Encourage maintenance" to promote a supportive approach to enhancing food safety and traceability in traditional markets, considering the limited resources and infrastructure. This change aims to encourage gradual improvements in food safety practices, emphasizing support and guidance rather than imposing stringent requirements. The text will now read as follows: Encourage maintenance of traceability and record-keeping systems.

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

- South Africa supports Option 3 the full technical and structural alignment. This approach will ensure the completeness of the CCFH Guidelines and Codes of Hygienic practice where these documents contain all the technical requirements, and it is fully aligned with CXC 1-1969.

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)

- South Africa supports the revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012). It addresses key food safety aspects related to viruses and reflects the necessity for updated guidance considering new scientific advancements since the publication of CXG 79-2012.

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

- South Africa supports the new work proposal to revise and update the Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011). Incorporating recent scientific findings and JEMRA recommendations will offer clear, science-based guidance for addressing food safety concerns linked to Salmonella and Campylobacter in chicken meat, ultimately safeguarding public health and reducing the risk of foodborne illnesses.

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)

- South Africa supports the new work proposal to revise the Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods (CXG 61-2007) due to the

significant public health implications of *Listeria monocytogenes* in foods, particularly in ready-to-eat products. The proposed revision is timely and relevant, given the global concern regarding listeriosis outbreaks.

Agenda Item 13: Other Business and Future Work - New Work / Forward Workplan

- South Africa supports the 4 new work proposals received in response to CL 2023/30-FH. The rationale for the support of the new work is stated under Agenda Items 9-12.