



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

Comments of Uganda

Uganda is grateful for the chance to provide comments on the different agenda items for the upcoming 54th Session of the Codex Committee on Food Hygiene (CCFH54).

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)

Uganda appreciates the work of the EWG and supports the proposed draft Annex 2 on Fresh Leafy Vegetables to be advanced in the Codex Step process.

Para 17

Editorial comment: Uganda 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: Uganda 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** ~~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: Uganda proposes an editorial amendment by placing the existing third sentence become the second one and the third becomes the third.

Rationale: For proper flow and clarity

Para 26

Editorial comment: Uganda 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: Uganda 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 31

Editorial comment: Uganda 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: Uganda proposes an editorial amendment to the para by replacing "see" with "Refer to" in the second statement. The text to read: ...~~See~~ **Refer to** Section 4.3 above...

Rationale: For consistency

Para 44

Editorial comment: Before introducing the final bullets, Uganda suggests improving the paragraph by adding a colon.

Figure1: Process Flow for Fresh Leafy Vegetables

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

Rationale: The safety and the quality of the finished product may be impacted by environmental elements surrounding the production site.

Technical comment 2: Uganda 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: Proposed draft Annex IV on Sprouts (CX/FH 24/54/6)

General comment: Uganda expresses gratitude to the EWG for their work and proposes that the draft Annex 4 on sprouts be forwarded through the Codex Step process with the following comments added.

Para 6

Editorial comment: Uganda proposes editorial amendment to the para by replacing 'addressing' with 'for'.

Rationale: For clarity

Para 43

Editorial comment: Uganda 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: Uganda 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: Uganda acknowledges the use of the scope in section 5.4, where microbicidal therapy is not yet permitted. The use of chemical procedures in para. 47 and other physical treatments in para. 48 that are microbicidal is permitted for the treatment and pre-germination soak of seeds for sprouting. Uganda, seeing as it is inconsistent, therefore requests clarity.

Section 9 (Training)

Editorial comment: Uganda proposes that the bullet is given an independent para and the word 'nature' added between word risk and of sprout...

Rationale: For clarity

Para 78

Editorial comment: Uganda proposes that "and recorded" be added to para 78 to read:

...Temperatures should be monitored and recorded

Rationale: It will be indicator/evidence that morning was carried

Para 80, Figure 1: Sprouts flow diagram

Technical comment: Uganda requests clarification over the flow diagram's use of the word "deposit."

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

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: Uganda acknowledges the EWG's efforts in creating these guidelines as presented in Appendix 1

- 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: Uganda 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: Uganda 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: Uganda 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: Uganda proposes that these Annexes are advanced in the Codex Step process while taking the submitted comments into account.

Appendix I

Annex II: Fish and Fishery Products

Section 4 (definition), para 10 and 11

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

Rationale: For clarity with the rest of the Codex texts

Para 16

Editorial Comment: Uganda proposes in the **last bullet**, to replace "don't" with "**shouldn't**" in the last sentence

Para 16, bullet two

Technical Comment: Uganda seeks clarification on this bullet as its not clear

Para 18

Technical comment: Uganda seeks clarification for the use of term non-potable water in codex text as used in this para and proposes that its defined.

Para 26

Technical Comment: Uganda suggests amending the current statement to add additional quality tests, like those for chemical pollutants.

Rationale: Given that hydroponics and wastewater are the sources of treated water, chemical contamination is most likely one of the contamination sources.

Annex III: Production of Milk and Milk products

Para 19

Editorial Comment: Uganda suggests an editing change to the second sentence, which would take care of the matter by qualifying the word "it" with a "s" between the word after and first to qualify it into "its"

Para 29

Editorial comment: Uganda proposes to delete the word "of" in the first sentence and replace it with a comma for purposes of consistency

Para 66, third line

Editorial comment: Uganda proposes the replacement of providing with **provided** for clarity.

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

Editorial comment: Uganda seeks clarification for an **unexplained question mark** as used in the figure.

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

Para 6

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

Para 12, bullet one

Editorial comment: Uganda proposes the interchange of “if even” to “even if” in the statement.

Para 15, third bullet

Editorial Comment 1: Uganda proposes an editorial amendment on the para, to delete “be” between the word may and buildup.

Para 15, last bullet

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

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) (CX/FH 24/54/8)

General comment: Uganda suggests moving on with the draft in the Codex Step Process, expressing gratitude for the EWG’s efforts while taking the submitted comments into account.

Appendix I

Para 12

Editorial comment: Uganda 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: Uganda 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 (CX/FH 24/54/9)

General comment: Uganda 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: Uganda 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: Uganda 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: Uganda suggests that "friendly" be used in place of "simple" in the phrase to make it more understandable.

Para 7.4.11

Technical comment: Uganda proposes that the para is made mandatory by replacing should with a shall wherever they appear.

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: Uganda 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

Uganda supports for the guideline be progressed to the next Codex Step process

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 comment 1: Uganda takes note of the three options as provided to achieve the varying levels of alignment of the existing texts with CXC 1-1969 and recommends that option 3 (Full structural and technical alignment with CXC 1- 1969) to be considered

Q1

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

Q3

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

Rationale: Elaboration in this section is adequate

Q4

Technical comment: Uganda 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: Uganda 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

Rationale: It gives a better guide to the user.

Q6

Technical comment: Uganda 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).

Q7

Technical comment: Uganda proposes the adoption of option 2

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

Q8

Technical comment: Uganda 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: Uganda 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: Uganda 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: Uganda 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: Uganda 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, Uganda supports the project document to undertake new work to revise and update the appropriate text in CXG 78-2011. Uganda 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: Uganda 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)***'. Uganda therefore recommends that this new work on the revision of the guidelines be considered by CCFH54. Uganda 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: Uganda 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). Uganda notes the guidance given in this project document as well as the new work items that are currently underway. Uganda appreciates that the forward workplan is inline with the ***Process by which the Codex Committee on Food Hygiene (CCFH) will undertake its work***. Uganda supports the New work/Forward workplan as envisioned in the project document.