



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fiftieth Session

Panama, 12 – 16 November 2018

Comments of the Russian Federation

General Comments:

The Russian Federation requests to take into account our comments and suggestions on some items of the agenda of the 50th session of the Codex Committee on Food Hygiene

Agenda Item 7

Agenda item 7 (Draft code of practice on food allergen management for food business operators):

The Russian Federation supports the work on the document.

We propose to clarify paragraph 7 of the Draft and set out a list of allergens in the following edition:

- cereals containing gluten, i.e. wheat, rye, barley, oats, speltz and their hybrid lines, and products from them;
- celery;
- crustaceans and their products;
- eggs and their products;
- fish and fish products;
- ~~peanuts~~, soybeans and products from them;
- milk and dairy products (including lactose);
- ~~wood~~ nuts, including peanuts, and products from them; and
- sulfite at concentrations of 10 mg / kg or higher.

In general, according to the document we suggest:

- a) consider the inclusion of provisions on the threshold level of allergic effects and the permissible level of health risk in allergic reactions in order to determine management criteria (for example, labeling).
- b) consider the inclusion in the document of provisions on the prevention of food contamination by chemicals and biological agents that can cause allergic reactions (for example, mold, some food additives).
- c) formulate provisions on the need to manage food allergens in the production and circulation of non-protein components derived from the food products listed in the document.

Agenda Item 8

Agenda item 8 (Draft guidance for the management of (micro)biological foodborne crises/outbreaks):

The Russian Federation supports the preparation of the document and the general principles set forth in it, and announces its readiness to participate in further work on the draft text of the document in the framework of the electronic working group.

We draw attention to the possible risks of low efficiency of implementation in the practice of the recommendations contained in the document, related to the presence of pronounced regional, national and subnational differences in the algorithms of the existing systems for assessing food safety and epidemiological monitoring for marker nosologies for this section of activity.

We consider it critical to consider the national specifics of investigating outbreaks of diseases, including provisions for recalling products from the market.

We consider it expedient to single out a minimum list of requirements, the observance of which makes it possible to exchange information at the international level in the area of work, in assessing food safety.

Agenda Item 9

Agenda item 9 (Discussion paper on future work on Shiga toxin-producing *Escherichia coli* (STEC) :

The Russian Federation considers it timely and necessary to develop a document. In case of approval by the Committee of the continuation of work in this area, we would like to take part in the preparation of the draft document in the framework of the electronic working group.

We offer to expand the list of products, and include food products made from raw beef, for example, raw smoked sausages and other meat products.

We propose to include in the document under preparation issues of STEC carrier carriage prevention in animals, including through systematic monitoring of carriage in animals in large livestock complexes for the production of milk and meat.

We also consider it expedient to provide in the draft document for conducting research on the possibility of using bacteriophages, bacteriocins for prophylactic processing of food raw materials (beef, lamb, etc.) and green plants (dill, parsley, etc.), in combination with physical methods of antibacterial treatment..

We propose to include in the document provisions on the continuous monitoring of STEC infection.