CODEX ALIMENTARIUS COMMISSION





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Agenda Item 5 CX/FH 13/45/6

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD HYGIENE

Forty-fifth Session

Hanoi, Viet Nam, 11 - 15 November 2013

PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR SPICES AND DRIED AROMATIC HERBS

(At Step 3)

Prepared by the Electronic Working Group led by United States of America and India

Governments and interested international organizations are invited to submit comments on the attached Proposed Draft Code of Hygienic Practice at Step 3 (see Appendix I) and should do so in writing in conformity with the Uniform Procedure for the Elaboration of Codex Standards and Related Texts (see Procedural Manual of the Codex Alimentarius Commission) to: Ms Barbara McNiff, US Department of Agriculture, Food Safety and Inspection Service, US Codex Office, 1400 Independence Avenue, SW, Washington, D.C. 20250, USA, email Barbara.McNiff@fsis.usda.gov with a copy to: The Secretariat, Codex Alimentarius Commission, Joint WHO/FAO Food Standards Programme, FAO, Viale delle Terme di Caracalla, 00153 Rome, Italy, by email codex@fao.org by 7 October 2013.

Format for submitting comments: In order to facilitate the compilation of comments and prepare a more useful comments document, Members and Observers, which are not yet doing so, are requested to provide their comments in the format outlined in the Annex to this document.

Background

- 1. At the 43rd Session of the Committee on Food Hygiene (Miami, United States of America, 5-9 December 2011), the Committee agreed to begin new work to revise the *Code of Hygienic Practice for Spices and Dried Aromatic Plants* (CAC/RCP 42-1995) and agreed to establish an electronic working (EWG), led by the United States of America. The Committee noted that, in order to follow a more horizontal approach in the development of Codex documents, this document may become an annex to a general code on low moisture foods at a later stage.
- 2. At the 44th Session of the Committee on Food Hygiene, the Committee decided to return the revised Code to Step 2 and convene an Electronic Working Group (EWG) to continue to revise the *Code of Hygienic Practice for Spices and Dried Aromatic Plants*. The EWG was led by the United States of America and cochaired by India.
- 3. The objective of the EWG was to prepare a Draft Revision of the *Code of Hygienic Practice for Spices* and *Dried Aromatic Plants* (CAC/RCP 42-1995) for consideration by the Committee on Food Hygiene at its 45th Session.

Electronic Working Group

4. The EWG considered the original draft of the revised document presented at the 44th Session of the Committee on Food Hygiene with changes decided upon by the Committee in plenary and suggestions provided by member countries in written comments. A second draft was prepared with input from Bolivia, Canada, European Union, France, India, Japan, Kenya, Thailand, the United States of America, Uruguay, and the International Organization of Spice Trade Associations (IOSTA). A third draft was prepared with input from Argentina, Brazil, Bolivia, Canada, European Union, France, India, Japan, Kenya, Thailand, the United States of America, Uruguay, and IOSTA. This draft revision is attached as Appendix I. The list of EWG members is attached as Appendix II.

5. As agreed to at the 44th session, the document was revised to use the term "spices" instead of "dried spices" and "dried aromatic herbs" instead of "dried aromatic plants" (since it was agreed that tea and dried vegetables would not be included in the scope.

- 6. The proposed draft Code was organized to be consistent with the *General Principles of Food Hygiene* (CAC/RCP 1-1969) and the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003).
- 7. In certain cases, there may be a need to further align the Draft Revision of *the Code of Hygienic Practice for Spices and Dried Aromatic Plants* with the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003), but the EWG deferred making extensive changes at this point in anticipation of the revision of CAC/RCP 53-2003.
- 8. The EWG added language to provide flexibility for small-scale producers and producers from developing countries throughout the code.
- 9. The EWG considered and revised text regarding wild and domestic animals and human activity in the primary production area.
- 10. The EWG considered and revised text regarding water for primary production. It was noted that the issues related to irrigation are adequately addressed in the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003), which specifies that the "type of irrigation should be suitable for the specific crop and should not constitute a source of contamination."
- 11. The EWG deleted the text in 5.2.3 related to a microbiological criterion for *Salmonella* in Annex I but retained Annex I in square brackets, awaiting information from FAO/WHO on the risk from *Salmonella* associated with spices and dried aromatic herbs and an evaluation of whether criteria for *Salmonella* are meaningful for public health protection.

Recommendations

- 12. The 45th Session of the Committee on Food Hygiene is invited to consider the Proposed Draft Revision of the *Code of Hygienic Practice for Spices and Dried Aromatic Herbs* in Appendix I.
- 13. The EWG recommends the Committee consider the following list of issues, where the relevant draft text has been identified by being placed within square brackets:
 - Whether to include the *General Standard for Contaminants and Toxins in Food and Feed* in the discussion of use (CODEX STAN 193-1995) (section 2.2, paragraph 7).
 - How much of the text in paragraph 8 to include in section 2.2 to describe flexibility in the code and whether to further define extent of flexibility by identifying and/or defining the groups to which such flexibility is extended as is done in the codes for eggs and egg products and milk and milk products (CAC/RCP 15-1976 and CAC/RCP 57-2004).
 - Whether to include the two bullets describing guidance on the application of soil fungicides or source plant fungicides in the code (Section 3.2.1.4, paragraph 26).
 - Whether to include text on microbiological and other specifications and, if so, what wording should be used (section 5.2.3, paragraphs 79a or 79b).
 - Whether to include the recommendation regarding a written food safety plan (section 5.7, paragraph 98).
 - Whether to include the list of examples of the types of records that should be retained (section 5.7, paragraph 99).
 - Whether to include a microbiological criterion for *Salmonella* for spices and dried aromatic herbs and, if so, what the value of "n" should be (Annex I, paragraphs 114-117). (This decision is awaiting an FAO/WHO report requested during the 44th session of the Committee on Food Hygiene.)

Appendix I

PROPOSED DRAFT REVISION OF THE CODE OF HYGIENIC PRACTICE FOR SPICES AND DRIED AROMATIC HERBS (CAC/RCP 42 – 1995)

INTRODUCTION

- 1. Dried, fragrant, aromatic or pungent, edible plant substances, in the whole, broken or ground or blended form, e.g., spices and dried aromatic herbs, impart flavour when added to food. Spices and dried aromatic herbs may include many parts of the plant, such as aril, bark, berries, buds, bulbs, leaves, rhizomes, roots, seeds, stigmas, pods, resins, fruits, or plant tops.
- 2. The production, processing, and packing of spices and dried aromatic herbs is very complex. For example, source plants for spices and dried aromatic herbs are grown in a wide range of countries and on many types of farms, e.g., from very small farms to, in rare instances, large farms. Agricultural practices for growing source plants for spices and dried aromatic herbs also vary tremendously from virtually no mechanization to highly mechanized practices. Drying of source plants may be performed mechanically (for rapid drying) or naturally (e.g., slower drying under the sun for several days). The distribution and processing chain for spices and dried aromatic herbs is also highly complex and can span long periods of time and include a wide range of establishments. For example, spices and dried aromatic herbs grown on small farms may pass through multiple stages of collection and consolidation before reaching a spice processor and packer or a food manufacturer. Dried product processing generally involves cleaning (e.g., culling, sorting to remove debris), grading, sometimes soaking, slicing, drying, and on occasion Some spices and dried aromatic herbs are also treated to mitigate microbial grinding/cracking. contamination, typically by steam treatment, gas treatment (e.g., ethylene oxide), or irradiation. Processing and packing/repacking may also take place in multiple locations across long periods of time, since spices and dried aromatic herbs are prepared for different purposes.
- 3. The safety of spices and dried aromatic herbs products depends on maintaining good hygienic practices along the food chain during primary production, processing, packing, retail, and at the point of consumption. Sporeforming bacteria, including pathogens such as *Bacillus cereus, Clostridium perfringens*, and *Clostridium botulinum*, as well as non-sporeforming vegetative cells of microorganisms such as *Escherichia coli, Staphylococcus aureus*, and *Salmonella*, have been found in spices and dried aromatic herbs. There have been a number of outbreaks of illness associated with spice and seasoning consumption, with most being caused by *Salmonella* spp. that have raised concerns regarding the safety of spices and dried aromatic herbs. The complex supply chain for spices and dried aromatic herbs makes it difficult to identify the point in the food chain where contamination occurs, but evidence has demonstrated that contamination can occur throughout the food chain if proper practices are not followed.
- 4. The safety of spices and dried aromatic herbs can also be affected by mycotoxin-producing mould (e.g., those producing aflatoxin and ochratoxin A). Chemical hazards such as heavy metals and pesticides, as well as physical contaminants such as stones, glass, wire, extraneous stems, sticks and other objectionable material, may also be present in spices and dried aromatic herbs.

SECTION I – OBJECTIVES

5. This Code of Hygienic Practice addresses Good Agricultural Practices (GAPs) and Good Manufacturing Practices (GMPs) that will help minimize contamination, including microbial, chemical and physical hazards, associated with all stages of the production of spices and dried aromatic herbs from primary production to consumer use. Particular attention is given to minimizing microbial hazards.

SECTION II - SCOPE, USE AND DEFINITION

2.1 Scope

6. This Code applies to spices and dried aromatic herbs - whole, broken, ground or blended. Spices and dried aromatic herbs may include the dried aril (e.g., the mace of nutmeg), bark (e.g., cinnamon), berries (e.g., black pepper), buds (e.g., clove), bulbs (e.g., dried garlic), leaves (e.g., dried basil), rhizomes (e.g., ginger, turmeric), seeds (e.g., mustard), stigmas (e.g., saffron), pods (e.g., vanilla), resins (e.g., asafoetida),

fruits (e.g., dried chilli) or plant tops (e.g., dried chives). It covers the minimum requirements of hygiene for growing, harvesting, post-harvest technology and practices (e.g., curing, bleaching, cutting, drying, cleaning, grading, packing, transportation and storage, including disinfestation) processing establishment, processing technology and practices (e.g., grinding, blending, freezing and freeze drying, microbial reduction treatments) packaging and storage of processed products.

2.2 Use

- 7. This Code follows the format of the *General Principles of Food Hygiene* (CAC/RCP 1-1969) and should be used in conjunction with it and other applicable codes such as the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003) [and the *General Standard for Contaminants and Toxins in Food and Feed* (CODEX STAN 193-1995]).
- [8. This Code is a recommendation to which producers in different countries should adhere as far as possible taking into account the local conditions while ensuring the safety of their products in all circumstances. Flexibility in the application of certain requirements of the primary production of spices and dried aromatic herbs can be exercised, where necessary, provided that the product will be subjected to control measures sufficient to obtain a safe product. Such flexibility is indicated throughout this Code by the use of parenthetical statement "if used" or "where practicable" placed next to the particular provision where the flexibility is needed.]

2.3 Definitions

- 9. Refer to definitions in the *General Principles of Food Hygiene* and the *Code of Hygienic Practice for Fresh Fruits and Vegetables*. In addition, the following expressions have the meaning stated:
- 10. Spices and Dried Aromatic Herbs—dried components or mixtures of dried plants used in foods for flavouring, colouring, and imparting aroma. This term equally applies to whole, broken, ground and blended forms.
- 11. **Disinfest** to eliminate harmful, threatening, or obnoxious pests, e.g., vermin
- 12. **Microbial Reduction Treatment** process applied to spices and dried aromatic herbs to eliminate or reduce microbial contaminants to an acceptable level.
- 13. **Source Plant** –plant (non-dried) from which the spice or dried aromatic herb is derived.

SECTION III - PRIMARY PRODUCTION

3.1 Environmental Hygiene

14. Source plants for spices and dried aromatic herbs should be protected, to the extent practicable, from contamination by human, animal, domestic, industrial and agricultural wastes which may be present at levels likely to be a hazard to health. Adequate precautions should be taken to ensure that these wastes are disposed of in a manner that will not contaminate plants and constitute a health hazard to consumers of the final product.

3.1.1 Location of the production site

- 15. The proximity of production sites that pose a high risk for contamination of source plants, such as animal production facilities, hazardous waste sites and waste treatment facilities, should be evaluated for the potential to contaminate production fields for source plants for spices and dried aromatic herbs with microbial or other environmental hazards.
- 16. Consideration of production site location should include an evaluation of the slope and the potential for runoff from nearby fields, the flood risk as well as hydrological features of nearby sites in relation to the production site.
- 17. When the environmental assessment identifies a potential food safety risk, measures should be implemented to prevent or minimize contamination of source plants for spices and dried aromatic herbs at the production site.

3.1.2 Wild and domestic animals and human activity

18. Many wild and domestic animal species and humans that may be present in the production environment are known to be potential carriers of foodborne pathogens. Domestic and wild animals and human activity can present a risk both from direct contamination of the crop and soil as well as from contamination of surface water sources and other inputs. The following should be considered:

• Domestic and wild animals should be excluded from production and handling areas, to the extent possible, using appropriate control methods. Methods selected should comply with local, regional, and national environmental and animal protection regulations.

- If animals are used in the harvest of source plants for spices and dried aromatic herbs, care should be taken to ensure that the animals do not become a source of contamination, e.g., by animal faeces.
- Production and handling areas for source plants for spices and dried aromatic herbs should be
 properly maintained to reduce the likelihood of pest attraction. Activities to consider include efforts
 to minimize standing water in fields, to restrict access by animals to water sources, and to keep
 production sites and handling areas free of waste and clutter.
- Source plant production sites and handling areas for spices and dried aromatic herbs should be evaluated for evidence of the presence of wildlife or domestic animal activity (e.g., presence of animal faeces, large areas of animal tracks, or burrowing).

3.2. Hygienic production of food sources

- 19. Source plants for spices and dried aromatic herbs should be grown, harvested and cleaned of debris in accordance with Good Agricultural Practices (*Code of Hygienic Practice for Fresh Fruits and Vegetables*).
- 20. Arrangements for the disposal of domestic and industrial wastes in areas from which raw materials are derived should be acceptable to the official agency having jurisdiction

3.2.1 Agricultural input requirements

21. Refer to the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003).

1.1.1.1. 3.2.1.1 Water for primary production

- 22. Refer to the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003). In addition, the following should be considered.
- 23. Source plants for spices and dried aromatic herbs should not be grown or produced in areas where the water used for irrigation might contaminate plants. Growers should identify the sources of water used on the farm (e.g., municipal water, well water (deep vs. shallow), surface water (e.g., rivers, reservoirs, ponds, lakes, open canals) re-used irrigation water, reclaimed wastewater, discharge water from aquaculture. It is recommended that growers assess and, where practicable, manage the risk posed by these waters as follows:
 - Assess the potential for microbial contamination (e.g., from livestock, human habitation, sewage
 treatment, manure and composting operations) and the water's suitability for its intended use.
 Reassess the potential for microbial contamination if events, environmental conditions (e.g.,
 temperature fluctuations, heavy rainfall, etc.) or other conditions indicate that water quality may
 have changed.
 - Identify and implement corrective actions to prevent or minimize contamination. Possible corrective actions may include fencing to prevent large animal access, properly maintaining wells, filtering water, not stirring the sediment when drawing water, building settling or holding ponds, and water treatment facilities. Settling or holding ponds that are used for subsequent irrigation may be microbiologically safe, but may attract animals or in other ways increase the microbial risks associated with water for irrigating plants. If water treatment is needed, consult with water safety experts.
 - Determine if microbial and chemical testing should be done to evaluate the suitability of water for each intended use. Analytical testing may be necessary after a change in irrigation water source, flooding or a heavy rainfall when water is at a higher risk of contamination.

1.1.1.2. 3.2.1.2 Manure, biosolids and other natural fertilizers

24. Refer to the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003).

1.1.1.3. 3.2.1.3 Soil

25. Refer to the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003).

1.1.1.4. 3.2.1.4 Agricultural chemicals

26. Refer to the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003). In addition:

- [Soil fungicides may be used in accordance with the manufacturer's instructions on seedbeds or fields if necessary to reduce the amount of spores of mycotoxin-producing moulds. It is important to be aware of the potential for fungicide residues in the source plant.
- If appropriate, for preventive purposes, fungicides may be used on source plants, e.g., fruits, to avoid the introduction of mycotoxin-producing moulds.]

3.2.3 Personnel health, hygiene and sanitary facilities

- 27. Refer to the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003). In addition, the following should be considered:
 - Where appropriate, each business operating primary production operations should have written
 procedures that relate to health, hygiene and sanitary facilities. The written procedures should address
 worker training, facilities and supplies to enable agricultural workers to practice proper hygiene, and
 company policies relating to expectations for worker hygiene as well as illness reporting.
 - All agricultural workers should properly wash their hands using soap and clean running water, followed by thorough drying, before handling source plants or dried spices and dried aromatic herbs, particularly during harvesting and post-harvest handling. If running clean water is not available, an acceptable alternative hand washing method should be agreed to by the relevant competent authority. Agricultural workers should be trained in proper techniques for hand washing and drying.
 - Non-essential persons, casual visitors and, to the extent possible, children, should be deterred from entering the harvest area as they may present an increased risk of contamination. When such persons are present, care should be taken to ensure they do not become a source of contamination.

1.1.1.5. 3.2.3.1 Personnel hygiene and sanitary facilities

- 28. Growers should consider providing, where practicable, areas away from the growing/harvest area for agricultural workers to take breaks and eat. For worker convenience, these areas should provide access to toilet and hand-washing and drying_facilities so agricultural workers can practice proper hygiene.
- 29. As far as possible, sanitary facilities should be readily accessible to the work area.
 - Sanitary facilities should be located in a manner to encourage their use and reduce the likelihood that agricultural workers will relieve themselves in the growing/harvest area.
 - Portable facilities (if used) should not be located or cleaned in cultivation areas or near irrigation water sources or conveyance systems. Growers should identify the areas where it is safe to put portable facilities and to prevent traffic in case of a spill.
 - Facilities should include clean running water, soap, toilet paper or equivalent, and single use paper towels or equivalent. Multiple use cloth drying towels should not be used. Hand sanitizers should not replace hand washing and should be used only after hands have been washed.

1.1.1.6. 3.2.3.2 Health status

- 30. The following should be considered:
 - Growers should be encouraged to observe symptoms of diarrheal or food-transmissible, communicable diseases and reassign agricultural workers as appropriate.
 - Agricultural workers should be encouraged and, where feasible, be motivated with appropriate incentives to report symptoms of diarrheal or food-transmissible, communicable diseases.
 - Medical examination of agricultural workers should be carried out if clinically or epidemiologically linked

1.1.1.7. 3.2.3.3 Personal cleanliness

- 31. Refer to the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003).
- 32. When personnel with cuts and wounds are permitted to continue working the injury should be covered by water-proof dressings firmly secured. In addition there should be a secondary barrier between the cut or wound and the source plants handled, such as gloves or clothing, to cover the water-proof dressing.

3.3 Handling, Storage and Transport

33. Each source plant should be harvested using a method suitable for the plant part to be harvested in order to minimize damage and the introduction of contaminants. Plant matter that is damaged or other plant waste material should be disposed of properly and removed from the growing/harvest area in order to minimize the potential for it to serve as a source of mycotoxin-producing mould. If possible, only the amount that can be processed in a timely manner should be picked in order to minimize growth of mycotoxin-producing mould prior to processing. When the amount harvested exceeds processing capabilities, the excess should be stored under appropriate conditions.

3.3.1 Prevention of cross-contamination

- 34. Specific control methods should be implemented to minimize the risk of contamination from microorganisms associated with manual harvesting methods. The following should be considered:
 - Where appropriate, the soil under the plant should be covered with a clean sheet of plastic during picking/harvest to avoid contamination by dirt or plant matter that has fallen prior to harvesting. Plastic that will be reused should be easily cleaned and disinfected.
 - Source plant material that has fallen to the ground should be disposed of properly if it cannot be made safe by further processing.

1.1.1.8. 3.3.1.1 Natural Drying

- 35. Refer to the *Code of Practice for the Reduction of Contamination of Food with Polycyclic Aromatic Hydrocarbons (PAH) from Smoking and Direct Drying Processes* (CAC/RCP 68-2009).
- 36. Plants or parts of plants used for the preparation of spices and dried aromatic herbs may be dried naturally, e.g., air dried, provided adequate measures are taken to prevent contamination of the raw material during the process. The drying time depends on the environmental conditions surrounding the product, i.e., temperature, relative humidity, and air velocity.
- 37. If dried naturally, plants or part of plants should be dried on clean, elevated racks, clean concrete floors, or clean mats or tarps and not on the bare ground or in direct contact with the soil. Pathways should be made in the drying area to prevent anyone from walking on the crop. The drying plant material should be raked/turned frequently to limit mould growth.
- 38. Concrete floors or slabs poured specifically for drying source plants should be subject to an appropriate cleaning program and, where appropriate, disinfected. New concrete slabs should be used for drying only when it is absolutely certain that the new concrete is well-cured and free of excess water. A suitable plastic cover spread over the entire new concrete slabs can be used as a moisture barrier; however, the sheet should be completely flat to prevent the pooling of water. Suitable precautions should be taken, where practicable, to protect the spices and dried aromatic herbs from contamination by domestic animals, rodents, birds, mites and other insects or other objectionable substances during drying, handling and storage. If drying outdoors, drying platforms should be placed under a roof/tarp free of tears, holes or frayed material that will prevent rewetting by rainfall and contamination from birds overhead.
- 39. Drying time should be reduced as much as possible by using optimal drying conditions to avoid fungal growth and toxin production. The thickness layer of the drying source plant material_should be considered in order to consistently achieve a safe moisture level.

3.3.2 Storage and transport from the growing/harvest area to the packing establishment

40. The conveyances for transporting the source plant material or spices and dried aromatic herbs from the place of production to storage for processing should be cleaned and disinfested before loading. Products should be protected, where practicable, against outdoor conditions when transported.

41. Prevent field debris from entering packing and storage facilities by cleaning the outside of harvest bins and requiring workers to wear clean clothes in those areas.

- 42. Spices and dried aromatic herbs should be kept in areas where contact with water or moisture is minimized.
- 43. Spices and dried aromatic herbs should be stored on raised platforms under a non-leaking roof in a cool dry place. The storage location should prevent access, to the extent practicable, by rodents or other animals and birds and should be isolated from areas of excessive human or equipment traffic.

3.3.3 Packing in the growing/harvest area

- 44. Packing activities can occur in the growing/harvest area. Such packing operations should include the same sanitary practices, where practical, as packing spices and dried aromatic herbs in establishments or modified as needed to minimize risks. To prevent germination and growth of mould spores, the products must be dried to a safe moisture level prior to packing.
- 45. When packing spices and dried aromatic herbs in the growing/harvest area for transport, storage, or for further sale, new bags should be used to prevent the potential for microbial, physical and chemical contamination. When bags are marked, food-grade ink should be used to minimize the potential for contamination with ink. When bags have an open structure, such as jute bags, the bag should not be marked when filled with spices and dried aromatic herbs to prevent liquid ink from contaminating the contents and increasing the moisture in the spices and dried aromatic herbs. It is recommended that paper tags be used instead of liquid ink for marking.
- 46. Removal of discarded plant material should be done on a regular basis in order to avoid accumulation that would promote the presence of pests.

3.4 Cleaning, Maintenance and Personnel Hygiene at Primary Production

3.4.1 Cleaning programs

- 47. The following should be considered:
 - Harvesting equipment, including knives, pruners, machetes, that come into direct contact with source
 plants for spices and dried aromatic herbs should be cleaned at least daily or as the situation warrants
 and, when necessary, disinfected.
 - Clean water should be used to clean all equipment directly contacting spices and dried aromatic herbs, including farm machinery, harvesting and transportation equipment, containers and knives.
 - Equipment should be allowed to dry before use.

3.4.2 Cleaning procedures and methods

48. Cleaning and disinfection programs should not be carried out in a location where the rinse water might contaminate plant material used for spices and dried aromatic herbs.

SECTION IV - ESTABLISHMENT: DESIGN AND FACILITIES

4.2 Premises and rooms

- 49. Where practicable, buildings and facilities should be designed to provide separation, by partition, location or other effective means, between operations that could result in cross contamination. They should be designed to facilitate hygienic operations according to the one-way flow direction, without backtracking, from the arrival of the raw materials at the premises to the finished product, and should provide for appropriate temperature conditions for the process and the product.
- 50. The application of appropriate hygienic design standards to building design and layout is essential to ensure that contaminants are not introduced into the product. Hygienic design should ensure that if a pathogen such as *Salmonella* is introduced does not become established in specific areas that can serve as a source of contamination of the product. Premises and rooms used for spices and dried aromatic herbs should be physically separated from wet processing areas and designed such that they can be cleaned routinely with little or no water, when wet cleaning is required, premises and rooms should be thoroughly dried before introducing spices and dried aromatic herbs again.

51. Since limiting water is the primary means to control microbial growth from pathogens such as *Salmonella* or mycotoxin-producing moulds, in establishments processing and packing spices and dried aromatic herbs, premises and rooms should be designed to exclude moisture from the environment. In general, areas in which spices and dried aromatic herbs are handled should not have drains; however, if drains are present, the surrounding floor should be properly sloped for effective drainage and kept dry under normal conditions.

- 52. Procedures should be established to inspect the integrity of the establishment (e.g., for roof leaks); such problems should be corrected as soon as they are detected.
- 53. Proper ventilation should be in place to correctly manage temperature, humidity and dust in the establishment. Calibrated electronic sensors may be used to monitor temperature and, humidity. In addition, airflow in the establishment should provide for higher air pressures in the packaging areas and lower air pressures in rooms where incoming materials are handled. Exhaust vents should be hygienically designed to prevent the formation and accumulation of condensation around the vent exit and to prevent water from reentering the establishment. Exhaust ducts should be cleaned on a regular basis and should be designed to prevent reverse air flow.
- 54. Premises and rooms should be designed with a means of dust control, since spices and dried aromatic herbs are likely to generate particulate matter that can be carried to other parts of the room or premise by air currents.
- 55. Should the spices and dried aromatic herbs become contaminated with a pathogen such as *Salmonella*, the pathogen can become established in a specific area. If the harbourage site becomes wet, the pathogen can grow to large numbers and the harbourage site can serve as a source of contamination to other places in the establishment, including food contact surfaces and products exposed to the environment.
- 56. Elevated infrastructure should be designed to minimize the accumulation of dust and dry material, especially when pipes, overhead structures and platforms are directly above exposed spices and dried aromatic herbs.
- 57. Construction and major maintenance activities can dislodge microorganisms from harbourage sites where they have become established and lead to widespread contamination of the establishment. Because some microorganisms such as *Salmonella* can survive in dry environments for long periods of time, construction activities may release these microorganisms from hidden harbourage sites. Preventive measures such as temporary isolation of the construction or maintenance sites, rerouting of employee and equipment traffic, proper handling of construction material entry and waste material egress, maintaining negative pressure in the work site, and other appropriate measures should be implemented during construction and maintenance.

4.3 Equipment

- 58. Equipment should be designed to facilitate cleaning with little or no water and, when wet cleaning is required, to allow thorough drying before reusing the equipment for spices and dried aromatic herbs. Alternatively the design should allow disassembly such that parts can be taken to a room designed for wet cleaning. The equipment design should be as simple as possible, with a minimal number of parts and with all parts and assemblies easily accessible and/or removable for inspection and cleaning. Equipment should not have pits, cracks, corrosion, crevices, recesses, open seams, gaps, lap seams, protruding ledges, inside threads, bolt rivets, or dead ends.
- 59. Hollow areas of equipment as well as cracks and crevices should be eliminated whenever possible or permanently sealed. Items such as bolts, studs, mounting plates, and brackets should be continuously welded to the surface and not attached via drilled and tapped holes. Welds should be ground and polished smooth.
- 60. Push buttons, valve handles, switches and touch screens should be designed to ensure product and other residues (including liquid) do not penetrate or accumulate in or on the enclosure or interface.
- 61. Equipment should be installed so as to allow access for cleaning and to minimize transfer of dust particles to other pieces of equipment or to the environment.

62. The risk of contamination from equipment should be assessed and controlled. Wherever possible, forklifts, utensils, and maintenance tools for the finished product and packaging areas should be different from those used in the "raw" material area (e.g., prior to the microbial reduction treatment).

4.4 Facilities

4.4.8 Storage

63. Spices and dried aromatic herbs are susceptible to mould growth if storage conditions are not appropriate. Spices and dried aromatic herbs should be stored in an environment with humidity that does not result in product moisture that can-support the growth of mould.

SECTION V - CONTROL OF OPERATION

5.1 Control of food hazards

- 64. Measures should be taken at each step in the food chain to minimize the potential for contamination of spices and dried aromatic herbs by microbial pathogens (including mycotoxin-producing moulds), chemical contaminants, excreta, rodent hair, insect fragments and other foreign materials.
- 65. Depending on the activities conducted at the establishment, it may be useful to separate the establishment into areas, or zones, such as the raw material (pre-processing) area and the post-processing area, with stricter controls in areas post-processing where a microbial reduction treatment has been delivered and in the areas where product is being packaged.
- 66. Traffic patterns should be established with respect to movement of personnel and materials (e.g., ingredients used in dry-mixing, packaging materials, pieces of equipment, carts, and cleaning tools) according to the one-way flow <u>direction</u>, <u>without backtracking</u>, <u>with partitioning/separation of operations in order to minimize tracking of materials from other areas, e.g., the raw material area to the finished product area, in order to prevent cross-contamination.</u>
- 67. In the case of an unusual event, such as a roof leak or a faulty sprinkler that introduces water into the dry production or packaging environment, production should be stopped. The leak should be fixed, and the area cleaned, disinfected, and dried before production resumes. Products damaged from the unusual event should be evaluated based on risk and, where appropriate, properly treated or kept from entering the food chain.

5.2 Key aspects of hygiene control systems

5.2.2 Specific process steps

1.1.1.9.

1.1.1.10. **5.2.2.1** Mechanical Drying

- 68. Plants or parts of plants used for the preparation of spices and dried aromatic herbs may be dried mechanically (e.g., forced air drying), provided adequate measures are taken to prevent contamination of the raw material during the process. To prevent the growth of microorganisms, especially mycotoxin-producing mould, a safe moisture level should be achieved as rapidly as possible.
- 69. Mechanical drying methods should be used instead of natural (open) air drying, where possible, to limit exposure of spices and dried aromatic herbs to environmental contaminants and to prevent growth of mould. If hot air drying is used, the air should be free of contaminants and precautions should be made to prevent combustion gases from contacting the plant material or stored plant material in the area.
- 70. Drying time should be reduced as much as possible by using optimal drying conditions to avoid fungal growth and toxin production. The thickness layer of the drying source plant should be considered in order to consistently achieve a safe moisture level.

1.1.1.11. 5.2.2.2. Cleaning of spices and dried aromatic herbs

71. Spices and dried aromatic herbs should be cleaned properly (e.g., culled and sorted) to remove physical hazards (such as the presence of animal and plant debris, metal, and other foreign material) through manual sorting or the use of detectors, such as metal detectors. Raw materials should be trimmed to remove any damaged, rotten or mouldy material.

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72. Debris from culling and sorting should be periodically collected and stored away from the drying, processing and packaging areas to avoid cross-contamination and attracting pests.

1.1.1.12. 5.2.2.3 Microbial Reduction Treatments

- 73. In order to control microbiological contamination, appropriate methods of treatment may be used in accordance with the regulations set by the official agency having jurisdiction. When necessary to reduce risk, spices and dried aromatic herbs should be treated with a validated microbial reduction treatment prior to reaching the consumer in order to inactivate pathogens such as *Salmonella*. For additional information on validation, refer to the *Guidelines for the Validation of Food Safety Control Measures* (CAC/GL 69-2008). Commonly used methods involve the application of steam, fumigation using ethylene oxide or propylene oxide, or radiation. Where spices and dried aromatic herbs are irradiated, refer to the *Code of Practice for Radiation Processing of Food* (CAC/RCP 19-1979) and the *General Standard for Irradiated Foods* (CODEX STAN 106-1983).
- 74. Factors that should be controlled when using steam include exposure time and temperature. The process should ensure that all of the product achieves the desired temperature for the full length of time required. A drying step may be necessary to remove added moisture.
- 75. Factors that should be controlled when using irradiation include radiation dose and the size and shape of the package, as well as the penetrability_of the packaging_material to the type of radiation used. The process should ensure that all of the product is exposed to the minimum dose of radiation needed to provide the intended effect.
- 76. Factors that should be controlled when using ethylene oxide or propylene oxide include chemical concentration, exposure time, vacuum and/or pressure, density of the product, and gas permeability of the packaging material. The process should ensure that all product is directly exposed to the gas for the full length of time required.
- 77. For pathogen inactivation treatments the adequacy of the selected control measure (thermal or non-thermal) and associated critical limits for processing should be determined, considering the increased heat resistance reported for *Salmonella* at low water activities and the increased resistance of spores to most microbial reduction treatments. In some cases, challenge studies may be needed to support validation. Once the lethality of the process is validated by scientific data, the establishment should periodically verify that the process continues to meet the critical limits during operation and the process criteria achieve intended microbiocidal effects in the establishment.

5.2.3 Microbiological and other specifications

- 78. Refer to the General Principles of Food Hygiene and the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CAC/GL 21-1997).
- 79a. Possible alternative to 79b below to be more appropriate for a code of hygienic practice: [Where appropriate, specifications for pathogenic and toxigenic microorganisms, chemical residues, foreign material, and decomposition should be established that take into account subsequent processing steps, the end use of the spice or dried aromatic herb and the conditions under which the product was produced.]
- [79b. When tested by appropriate methods of sampling and examination, the products:
- (a) should be free from pathogenic and toxigenic microorganisms in levels that may present a hazard to health; and should comply with the provisions for food additives
- (b) should not contain any substances originating from microorganisms, particularly mycotoxins, in amounts that exceed the tolerances or criteria established by the Codex Alimentarius Commission or, where these do not exist, by the official agency having jurisdiction;
- (c) should not contain levels of insect, bird or rodent contamination that indicate that spices and dried aromatic herbs have been prepared, packed or held under unsanitary conditions;
- (d) should not contain chemical residues resulting from the treatment of spices and dried aromatic herbs in excess of levels established by the Codex Alimentarius Commission or, where these do not exist, by the official agency having jurisdiction;

(e) should comply with the provisions for contaminants, and with maximum levels for pesticide residues established by the Codex Alimentarius Commission or, where these do not exist, by the official agency having jurisdiction.]

- 80. In view of the limitations of end-product testing, food safety should be ensured through the design of an appropriate food safety control system and by verification of the implementation of the system and the effectiveness of the control measures e.g., through appropriate Quality Assurance or Quality Control auditing methods.
- 81. Microbiological testing can be a useful tool to evaluate and verify the effectiveness of food safety and sanitation practices, provide information about an environment, a process, and even a specific product lot, when sampling plans and methodology are properly designed and performed. The intended use of information obtained (e.g., evaluating the effectiveness of a sanitation practice, evaluating the risk posed by a particular hazard, etc.) can aid in determining what microorganisms are most appropriate to test for. Test methods validated for the intended use_should be selected. Consideration should be given to ensure proper design of a microbiological testing program. Trend analysis of testing data should be undertaken to evaluate the effectiveness of food safety control systems.
- 82. Verification activities may include, as necessary, appropriate environmental and/or product testing. When monitoring control measures and verification results demonstrate deviations, appropriate corrective action should be taken and the finished product should not be released until it is shown that it complies with appropriate specifications.

5.2.4 Microbiological cross-contamination

- 83. Effective measures should be taken to prevent cross-contamination of uncontaminated spices and dried aromatic herbs by direct or indirect contact with material at all stages of the processing. Raw products that may present a potential_hazard should be processed in separate rooms, or in areas physically separate from those where end-products are being prepared. Spices and dried aromatic herbs that have undergone a microbial reduction treatment should be processed and stored separately from untreated spices and dried aromatic herbs. Equipment should not be used for both treated and untreated products without adequate cleaning and disinfection before use with treated products.
- 84. Persons handling raw materials or semi-processed products capable of contaminating the end-product should not come into contact with any end-product unless and until they discard all protective clothing worn during the handling of the material at earlier stages of the processing and have changed into clean protective clothing. Hands should be washed and disinfected thoroughly before handling products at different stages of processing.

5.2.5 Physical and chemical contamination

- 85. Appropriate machines should be used to remove physical hazards such as pebbles or heavier stones. To separate foreign matter from the product, air tables or gravity separators can be used for particles of the same size and different density. Sieves of different diameters may be used to obtain the size required for each product and to remove foreign matter.
- 86. Regardless of the type of separator used, the following parameters should be considered: size of particles, density, weight and size, air speed, inclination of the sieve plate, vibration, etc. for the highest effectiveness of the procedure.
- 87. Magnets/metal detectors should be used to detect and separate ferrous from non-ferrous/metallic matter. For good extraction, magnets should be as close as possible to the metals to be extracted. Magnets work more efficiently when product flows freely. If needed, more than one magnet should be placed in the line. Magnets should be cleaned frequently. Equipment should be designed in such a way as to prevent metals extracted by magnets from being swept by the flow of product. Spices and dried aromatic herbs should be arranged in a fine layer to facilitate this operation.
- 88. In all cases, if the particles eliminated are removed and records are kept of how much and what type of foreign matter was collected and when it was cleaned, it will be possible to determine how the metals or foreign matter got there in order to implement corrective measures. Records should also be kept of the origin of product.

5.3 Incoming material requirements

89. Spices and dried aromatic herbs or their source plants should not be accepted by the establishment if they are known to contain contaminants which will not be reduced to acceptable levels by normal processing procedures, sorting or preparation. Precautions should be taken to minimize the potential for contamination of the establishment and other products from incoming materials that may be contaminated. Plants, parts of plants, spices and dried aromatic herbs suspected of being contaminated with animal or human faecal material should be rejected for human consumption. Special precautions should be taken to reject spices and dried aromatic herbs showing signs of pest damage or mould growth because of the potential for them to contain mycotoxins such as aflatoxins.

- 90. Raw materials should be inspected and sorted prior to processing (foreign matter, odour and appearance, visible mould contamination). Laboratory tests, e.g., for mould or pathogens such as *Salmonella*, should be conducted when necessary.
- 91. Spices and dried aromatic herbs and blends of these are often manufactured without a step that would inactivate pathogens. Spices and dried aromatic herbs should be obtained from approved suppliers. An approved supplier is one that can provide a high degree of assurance that appropriate controls in accordance with this Code have been implemented to minimize the possibility that pathogens such as *Salmonella* occur in the ingredient. Because of the diversity of production practices for spices and dried aromatic herbs, it is important to understand the controls in place for production of the incoming material. When the control measures used to produce the spices and dried aromatic herbs are not known, verification activities such as inspection and testing should be increased.
- 92. Consideration should be given to a program for testing spices and dried aromatic herbs to be used without a lethality step for relevant pathogens, e.g., *Salmonella*. Spices and dried aromatic herbs in which *Salmonella* is detected should not be used unless they are subjected to an effective microbial reduction treatment.

5.4 Packaging

- 93. Non-porous bags/containers should be used to protect the spices and dried aromatic herbs from contamination and the introduction of moisture, insects, and rodents. In particular, the reabsorption of ambient moisture in humid tropical climates should be prevented. Contamination should be prevented by the use of liners where appropriate. It is recommended that new bags or containers be used for food contact packaging. If reusable containers are used, they should be properly cleaned and disinfected before use. All bags/containers should be in good condition and particular attention paid to the potential for loose bag fibres that can become potential contaminants. Secondary containment bags/containers providing additional protection can be reused but should not have been previously used to hold non-food materials such as chemicals or animal feed.
- 94. Spices and dried aromatic herbs, e.g., dried chilli peppers, should not be sprayed with water to prevent breakage during packing. This may result in growth of mould and microbial pathogens, if present.
- 95. Finished products may be packed in gas tight containers preferably under inert gases like nitrogen or under vacuum in order to retard possible mould growth.

5.5 Water

96. The presence of water in the food processing environment, even in very small amounts present for short, sporadic time periods, may allow microorganisms, including mycotoxin-producing moulds and pathogens such as *Salmonella*, to grow in the environment. At times, moisture is obvious in the form of water droplets or puddles; or it may be from sporadic sources such as roof leaks. Other sources of moisture may be less visually apparent, including high relative humidity or moisture accumulating inside of equipment. Care should be taken to identify and eliminate such sources of water in the environment to prevent the development of harbourage sites that can become a source of product contamination.

5.7 Documentation and records

97. Refer to the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003). Records should identify the source (or lot number) of incoming raw materials and link the source or lot to the lots of outgoing products to facilitate traceability/product tracing. Reference should also be made to *Principles for*

Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CAC/GL 60-2006).

[98.Where practicable, a written food safety control plan that includes a description of each of the hazards identified in the hazard analysis process, as well as the control measures that will be implemented to address each hazard, should be prepared by food business operators. The description should include, but is not limited to, the following: an evaluation of the production site, water and distribution system, manure use and composting procedures, personnel illness, reporting policy, sanitation procedures and training programs.

- 99. The following are examples of the types of records that should be retained:
 - Microbiological testing results and trends analysis
 - Water monitoring and test results
 - Records of plant protection products used (e.g., pesticides, fungicides, herbicides)
 - Employee training records
 - Pest control records
 - Cleaning and sanitation reports
 - Equipment monitoring and maintenance records (e.g., calibration)
 - Inspection/audit records]

SECTION VI - ESTABLISHMENT: MAINTENANCE AND SANITATION

6.1 Maintenance and cleaning

100. Dust accumulation from product in establishments (i.e., on walls, ceilings, conveyor belts, lids and walls of batch tanks or mixing tanks, and the bottom of a bucket elevator) should be removed in a timely fashion through routine housekeeping. This is particularly important for products that are hygroscopic or in environments of high humidity leading to moisture absorption and localized condensation.

6.2 Cleaning programmes

- 101. A cleaning and disinfection schedule should be established to ensure that all areas of the establishment are appropriately cleaned and that special attention is given to critical areas including equipment and materials. The air handling system should be included in the cleaning and disinfection schedule. The cleaning and disinfection schedule should describe whether to use wet or dry cleaning. The presence of water in the dry processing environment can result from improper use of water during cleaning.
- 102. Dry cleaning is the preferred means of cleaning establishments handling spices and dried aromatic herbs, since the use of water can enhance the probability of contamination from pathogens such as *Salmonella*. Dry cleaning should collect, remove and dispose of residues without redistributing them or cross contaminating the environment. Dry cleaning involves the use of tools such as vacuum cleaners, brooms, and brushes. Brooms, brushes and vacuum cleaners should be dedicated to specific areas to minimize cross-contamination. By dedicating individual vacuum cleaners to specific areas, vacuumed material can be tested as part of an environmental monitoring program.
- 103. Compressed air should generally not be used for dry cleaning except in special situations (e.g., to dislodge dust from inaccessible points). Moreover, if and when compressed air is used, it should be dried and filtered to exclude microorganisms and moisture prior to use.
- 104. Dry cleaning is especially important in older establishments in which, in spite of regular maintenance, there may be a potential for the presence of cracks or other harbourage sites that may be difficult to eliminate. Even if residues of spices and dried aromatic herbs enter such a site, potential problems can be minimized if the residues and the sites are dry and kept dry. Once water enters the harbourage site, microbial growth can occur and the potential risk of contamination to the environment and eventually to the product is increased.
- 105. Wet cleaning may be appropriate in certain circumstances, e.g., when *Salmonella* has been detected in the environment. When water usage is necessary, minimal amounts should be used, and the use of high pressure hoses should be avoided. When wet cleaning is used, it should be followed by disinfection to inactivate microorganisms. Disinfectants that will rapidly evaporate after contact, such as alcohol-based disinfectants, provide a means to spot-disinfect equipment with a very minimal introduction of water. Wet cleaning and disinfection should be followed by thorough drying in order to keep the environment of the establishment as dry as possible.

6.3 Pest control systems

106. Drains should be trapped or otherwise equipped with appropriate means to prevent entry of pests from drainage systems.

6.4 Waste management

107. Suitable provision must be made for the storage and removal of waste. Storage areas for waste should be kept clean. Care should be taken to prevent access to waste by pests.

6.5 Monitoring effectiveness

108. Verification of sanitation should include an environmental monitoring program that has been designed to identify transient and/or resident pathogens such as *Salmonella* in the processing areas. Environmental monitoring should be conducted under normal operating conditions and will usually involve non-product contact surfaces. Product contact surface testing may be done, particularly as part of corrective actions for an environmental positive. Testing of the spices and dried aromatic herbs may also be conducted based on the results of environmental monitoring. Corrective actions should be taken when the microbiological criterion for the test organism is exceeded in an environmental monitoring or finished product sample.

SECTION VII - ESTABLISHMENT: PERSONAL HYGIENE

109. Refer to the General Principles of Food Hygiene.

SECTION VIII - TRANSPORTATION

110. Refer to the *Code of Practice for the Packaging and Transport of Fresh Fruit and Vegetables* (CAC/RCP 44-1995). In addition, bulk transport of spices and dried aromatic herbs, such as ship or rail car, should be well ventilated with dry air to prevent moisture condensation, e.g., resulting from respiration and when the vehicle moves from a warmer to a cooler region or from day to night. Prior to bulk transport, the products must be dried to a safe moisture level to prevent germination and growth of mould spores.

8.1 General Requirements for Transportation

111. Spices and dried aromatic herbs should be stored and transported under conditions that maintain the integrity of the container and the product within it. Vehicles should be clean, dry, and free from infestation. Spices and dried aromatic herbs should be loaded, transported, and unloaded in a manner that protects them from any damage or water. Care should be taken to prevent condensation when unloading spices and dried aromatic herbs from a refrigerated vehicle or while taking out of a cold storage. In warm, humid weather, the products should be allowed to reach ambient temperature before exposure to external conditions; this may require 1-3 days. Spices and dried aromatic herbs that have been spilled are vulnerable to contamination and should not be used as food.

SECTION IX - PRODUCT INFORMATION AND CONSUMER AWARENESS

112. Refer to the General Principles of Food Hygiene.

SECTION X - TRAINING

10.2 Training Programs

113. A training program should be established to educate employees on the potential sources of contamination of spices and dried aromatic herbs during production, harvesting, processing, transportation and storage Training should address proper hygienic practices to follow in order to minimize the entry or spread of pathogens such as *Salmonella*. Such training should include personnel who enter areas on a temporary basis (e.g., maintenance workers, contractors).

[ANNEX I

MICROBIOLOGICAL CRITERIA FOR SPICES AND DRIED AROMATIC HERBS

114. Microbiological criteria should be established in the context of risk management options and in accordance with the *Principles and Guidelines for the Establishment and Applications of Microbiological Criteria Related to Foods* (CAC/GL 21-97).

115. Salmonella is the primary pathogen of concern with respect to spices and dried aromatic herbs, as it has been the leading cause of illnesses, as well as the pathogen most frequently isolated from spices and dried aromatic herbs. The following microbiological criterion is to be applied to treated, ready-to-eat spices and dried aromatic herbs at points in the food chain after any microbial reduction treatment to be applied and prior to consumer use:

Microorganism	n	c	Analytical Unit	m	Class Plan
Salmonella	[10]	0	25 g	0	2

- 116. Where n = number of samples to be taken; c = the maximum tolerable number of analytical units above the microbiological limit m in a 2-class plan, m = a microbiological limit which, in a 2-class plan, separates conforming from non-conforming product.
- 117. The analytical methods to be employed should be the most recent editions of ISO 6579, or other validated methods that provide equivalent sensitivity, reproducibility, reliability, etc.]

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Annex

GENERAL GUIDANCE FOR THE PROVISION OF COMMENTS

In order to facilitate the compilation and prepare a more useful comments' document, Members and Observers, which are not yet doing so, are requested to provide their comments under the following headings:

- (i) General Comments
- (ii) Specific Comments

Specific comments should include a reference to the relevant section and/or paragraph of the document that the comments refer to.

When changes are proposed to specific paragraphs, Members and Observers are requested to provide their proposal for amendments accompanied by the related rationale. New texts should be presented in <u>underlined/bold font</u> and deletion in <u>strikethrough font</u>.

In order to facilitate the work of the Secretariats to compile comments, Members and Observers are requested to refrain from using colour font/shading as documents are printed in black and white and from using track change mode, which might be lost when comments are copied / pasted into a consolidated document.

In order to reduce the translation work and save paper, Members and Observers are requested not to reproduce the complete document but only those parts of the texts for which any change and/or amendments is proposed.