

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME****CODEX COMMITTEE ON FOOD HYGIENE****Forty-fifth Session****Hanoi, Viet Nam, 11 - 15 November 2013****COMMENTS ON THE PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR LOW-MOISTURE FOODS
(At Step 3)****Comments submitted by European Union (EU) and African Union (AU)****EUROPEAN UNION (EU)**

There clearly are microbiological risks associated with these products which need to be addressed. The EUMS therefore support the proposal to develop a horizontal code of hygienic practice for low moisture foods with annexes for specific products as necessary.

The EUMS also support asking FAO/WHO to provide scientific advice on microbiological hazards associated with low moisture foods as this would help in focusing the new work on those products which may present a greater risk.

The EUMS would like to make the following comments:

Scope

At its 44th session CCFH decided to exclude teas and dried vegetables from the scope of the code of hygienic practice for spices and dried aromatic herbs. The EUMS see no reason why teas should not be included in a Code on Low Moisture Foods. Their inclusion could be specified by clearly indicating the term "teas" in the scope in addition to dried aromatic herbs and the other foods listed. The EUMS noticed that the word "plants" has been included, which could imply the inclusion of tea in the scope of this Code on Low Moisture Foods, but the specific term "teas" should be included into the scope for clarity.

In Section 2.1 it is stated that the code covers low moisture products (i.e. food with a water activity (AW) of 0.85 or below). This definition implies that some dried fish or meat products fall under the scope, despite having a rather different production process. The EUMS would suggest considering excluding dried fish and meat products from the scope of this code. The EUMS believe that this is in fact the intention of the code and if so it should be clearly stated.

Use

Concerning the recommendation to decide if the Code of Hygienic Practice for Low-Moisture Foods will supplement or replace other applicable Codes included in Section 2.2:

The EUMS would suggest to include the codes of hygienic practice mentioned in section 2.2 (for dried fruits, desiccated coconut, dehydrated fruits and vegetables including fungi, tree nuts, groundnuts, spices and dried aromatic plants) in the code of hygienic practice for low moisture foods. The code of hygienic practice for low moisture foods should be the main, overall document as all these products fall under its scope, while all the specific codes could be included as Annexes where commodity-specific guidance is necessary.

Definition

Section 2.3 included a definition for sensitive ingredients stating that these are ingredients with the potential to be contaminated with enteric pathogens such as *Salmonella* and *E. coli* O157:H7. The EUMS believe this

definition is too vague and should be clarified. Indeed, all products/ingredient have the potential to be contaminated if hygienic procedures are not followed.

Primary Production

Concerning the recommendation whether to develop the section on Primary Production considering that several different foods are covered under this Code:

The EUMS acknowledge the difficulty to develop the section under primary production because it covers such a wide range of products. Therefore, given the wide range of products covered, text provided in the proposed draft code seems appropriate.

Specific process steps

Concerning the recommendation on whether to expand the validation section in Section 5.2.2, paragraph 40:

The EUMS believe that the text provided in paragraph 40 is sufficient and adequate as it makes reference in the same section to the Guidelines for the Validation of Food Safety Control Measures.

Annex I: Microbiological Criterion for Low-Moisture Foods

The EUMS have no doubts that *Salmonella* is one of the main pathogens of concern in low-moisture foods. However, the EUMS are of the opinion that describing a microbiological criterion to be applied in general to all low moisture foods does not seem feasible for such a heterogeneous group (e.g. very low prevalence in some groups of products, differences in prevalence between groups, heterogeneous distribution, etc...). The EUMS propose to postpone the discussion on a microbiological criterion for *Salmonella* until the scientific advice of FAO/WHO is available.

Annex II: Environmental Monitoring Programs

Concerning the recommendation on whether to include *Salmonella* and/or Enterobacteriaceae in the environmental monitoring program:

The EUMS consider that environmental sampling for *Salmonella* is feasible for products with known risk for Salmonella. Not all low moisture products will pose the same risk and therefore sampling of the environment is not always indicated. The EUMS would suggest waiting for the advice from FAO/WHO in order to be able to point out the products of greatest concern. It should also be considered to mention the use of *E. coli* as an indicator. Indeed, *E. coli* is a more specific indicator for fecal contamination than enterobacteriaceae.

AFRICAN UNION

<p><u>GENERAL COMMENT</u></p> <p>Introduction</p> <p>The document addresses the scope as defined by the 44th session of CCFH.</p> <p><u>SPECIFIC COMMENTS</u></p> <p>Para 1, line 8: <i>E. coli</i> O157:H7 should be removed from this sentence. <u>Note:</u> reference is made to <i>E. coli</i> O157:H7 in other places in the document and should be addressed in the same manner</p> <p>Section 3 Primary Production should not be developed further. However, the Draft Code of Hygienic Practice for Spices and Dried Aromatic Herbs should be included by name as a reference after final adoption.</p>	<p>The direct association of <i>E. coli</i> O157:H7 with low moisture foods is not fully supported by available epidemiological data.</p> <p>This section is covered by the General Principles of Food Hygiene. However, it is felt that specific reference should be made to the final Code of Hygienic Practice for Spices and Dried Aromatic Herbs, to give the user more detailed guidance on primary production of similar products to tea, such as certain herbs.</p>
<p>SECTION II - SCOPE, USE AND DEFINITION</p>	

SPECIFIC COMMENTS	
1.1 Scope Para 5: “Tea” should be included and expression of “dried aromatic <u>plants</u>” should be maintained. Para 5 line 3: Qualify “preserves” to read “certain preserves” .	Tea is a product that does not necessarily receive a kill-step and tea drying practices could expose it to <i>Salmonella</i> contamination. Certain preserves such as jams and marmalades will not support growth of <i>Salmonella</i> .
SECTION IV ESTABLISHMENT: DESIGN AND FACILITIES	
4.3.1 General Para 24, line 1: Consider adding the following to the existing statement at the beginning of the paragraph: “Proper hygienic equipment design is essential to prevent contamination by <i>Salmonella</i> from the environment. It is also essential to ensure.....”	Hygienic design of equipment is also important to prevent <i>Salmonella</i> ingress from the environment, not only to ensure that if contamination occurs, that the contamination is transient.
SECTION V - CONTROL OF OPERATION	
5.1 Control of food hazards Para 35, line 2: Add the word “microbial” to the word “growth” .	For clarity.
5.2.2 Specific process steps Para 38, line 1: Consider adding the following to the existing statement: “Whenever feasible, low-moisture foods or their raw materials”	As the paragraph stands, it implies that microbial reduction treatments should be given to the final product i.e. the low-moisture food. In many cases, this is not possible; however it may be possible to apply microbial reduction treatments to raw materials at different stages of production, which would be effective in reducing/eliminating contamination in the final product.
Para 39, line 1: Consider making the same addition as above after the term “low moisture food” i.e. “Commonly used methods for low moisture foods or their raw materials.....”	Same justification as above.
Para 40: Maintain the paragraph and no need for expansion.	This detail is useful and additional information is available in Guideline for the Validation of Food Safety Control Measures (CAC/GL 69-2008) as referenced in the document.
Para 40, bullet point 2: Make the same addition as for paragraphs 38 and 39 after the term “low moisture food” i.e. “The control measure (thermal or non-thermal) should be validated appropriately for the type of low moisture food or its raw materials.....”	Same justification as for paragraphs 38 and 39, above.
Para 45: Consider the following changes: When monitoring of control measures or verification results demonstrates deviations, “appropriate corrective actions should be taken” . “If there is a reason to suspect a product may have been contaminated.....”	When a deviation occurs, there are usually documented and planned corrective actions that should be taken. Final product testing is not the only option.
5.3 Incoming material requirements Para 49, line 3, end of sentence 2. Consider adding the following sentence prior to sentence 3: “Where required, certain sensitive ingredients should be stored under	Certain sensitive ingredients are hygroscopic and should therefore be stored under controlled conditions as indicated.

controlled temperature and moisture conditions”.	
SECTION VI - ESTABLISHMENT: MAINTENANCE AND SANITATION	
1.1 Maintenance and cleaning Para 60: Consider adding the term “dust-generating” to this sentence to read “.....other <u>dust-generating maintenance activities</u> ”.	Provides clarity to the sentence in terms of maintenance activities other than construction that could be a source of dust in the food plant.
SECTION X - TRAINING	
10.2 Training programmes Para 78, end of line 7: Consider adding “visitors” as an example in addition to the others mentioned.	Visitors are often not given induction training when entering food premises, so it is felt that these should be specifically mentioned, considering the high risk environment covered in this Code.
ANNEX I	
Microbiological criteria (MC) should be established for <i>Salmonella</i> in low moisture foods	Due to the variety of products included in this Draft Code i.e. low moisture foods, product category should be taken into consideration when establishing MC.
MC for Enterobacteriaceae (EB) should also be included.	Testing for EB in a facility is typically done as a process hygiene criterion and would therefore be very useful for low moisture foods.
ANNEX II	
Testing for <i>Salmonella</i> and EB in the environment should be included.	The ultimate target organism is <i>Salmonella</i> and it can be more persistent in the environment than EB. Therefore testing is recommended. However, frequency of testing based on product category would most likely vary.