

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 6, 7 and 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD HYGIENE
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Comments from Indonesia

AGENDA ITEM 5

REP 20/FH Appendix III

Draft Guidance for the Management of Biological Foodborne Outbreaks

General Comments

Indonesia would like to express our appreciation to Denmark, Chile, and the European Union for their efforts to prepare the revised version of the Draft Guidance for the Management of Biological Foodborne Outbreaks. We support the document to be forwarded for adoption at Step 8 by the Commission.

AGENDA ITEM 6

CX/FH 22/52/6

Proposed draft Decision Tree (revision of the *General Principles of Food Hygiene* (CXC 1-1969))

General Comment

Indonesia agrees to keep the decision tree diagram for identification of critical control points (CCPs) in the General Principles of Food Hygiene because it is necessary particularly for small and/or less developed food businesses to implement the HACCP system.

Specific Comment

Q1: New Q1: Can the hazard be controlled at this step by prerequisite programmes (e.g.GHPs)?*

Indonesia agrees with Q1 with the understanding that Q1 is for hazard(s) that has/have been identified as significant and there is a possibility that the hazard can be controlled by prerequisite programmes.

Furthermore, we also propose to modify the footnote to be consistent with Q1, as follows:

*Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by **prerequisite programmes (e.g.GHPs)**. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording).

Q2: Do control measures exist at this step?

Indonesia agrees with Q2

Rationale

This question is needed to confirm that all steps have control measures in the food process

Q3: Will a subsequent step eliminate the identified hazard or reduce its likely occurrence to an acceptable level?

Indonesia proposes to modify Q3 to include 'prevent' so the Q3 become:

Will a subsequent step prevent or eliminate the identified hazard or reduce its likely occurrence to an acceptable level?

This question should also consider if the significant hazard is allergen.

New Q4: Can this step prevent, reduce or eliminate the hazard to an acceptable level?

Indonesia proposes to modify Q4 to be consistent with the definition of control measure, so the Q4 will be read as follows:

Can this step prevent or eliminate the hazard or reduce it to an acceptable level?

AGENDA ITEM 7

CX/FH 22/52/7

Proposed draft 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

General Comment

In general, Indonesia agrees for most of paragraphs. However, there are some recommendations as below.

Introduction

Para 9. The Guidelines provide flexibility for the use at the national (and individual processing) level.

Indonesia agrees with this introduction and statement that the guidelines are already considered of flexibility for use at the national and individual processing level.

Definition

Para 19.

Indonesia prefers the first option and proposes to open the square brackets, so the sentence becomes:

Fresh leafy vegetables - Vegetables of a leafy nature where the leaf is intended for consumption without cooking, including, but not limited to, all varieties of lettuce, spinach, cabbage, chicory, endive, kale, radicchio, and fresh herbs such as coriander, cilantro, basil, curry leaf, colocasia leaves and parsley, among other local products for foliar consumption.

Para 20.

Indonesia prefers the second option and proposes to open the square brackets, so the sentence becomes:

Indicator microorganisms - microorganisms used as a sign of quality or hygienic status in food, water, or the environment, often used to signify the potential presence of pathogens, a lapse in sanitation or a process failure. Common indicator microorganisms include total bacterial counts, coliform or faecal coliform counts, total E. coli counts and counts of Enterobacteriaceae.

10. Implementation of Control Measure

10.3.1 Industry responsibility

Para 43.

Indonesia proposes to delete the word primary as industries have responsibility to provide safe food.

Industry has the ~~[primary]~~ responsibility for implementing, documenting, validating, and supervising process control systems to ensure the safety and suitability of raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts. These should incorporate measures for control of STEC as appropriate to national government requirements and industry's specific circumstances, and where applicable the measures should be applied in accordance with manufacturer's instructions.

10.3.2 Regulatory systems

Para 45.

Indonesia prefers that the word “should” to be used in this sentence as it is the responsibility of competent authority to provide guideline and other implementation to industry. Para 45 will be read as follows:

45. The competent authority should ~~could~~ provide guidelines and other implementation tools to industry, as appropriate, for the development of the process control systems.

Annex 1: Raw Beef

Para 66.

Indonesia proposes to delete ‘[311]’ as it does not have any meaning in this sentence

Annex 2. Fresh Leafy Vegetables

Definitions

Para 6.

Indonesia prefers the first option and proposes to open the square brackets. The sentence will be read as follows:

Fresh leafy vegetables - Vegetables of a leafy nature where the leaf is intended for consumption without cooking, including, but not limited to, all varieties of lettuce, spinach, cabbage, chicory, endive, kale, radicchio, and fresh herbs such as coriander, cilantro, basil, curry leaf, colocasia leaves and parsley, among other local products for foliar consumption.

4.1 Time and temperature control

Para 23.

Indonesia proposes to open the square brackets to give information on the recommended temperature to facilitate the implementation of the document. This paragraph will be read as follows:

23. Refer to the General Principles of Food Hygiene (CXC 1-1969). Time and temperature i.e., 7°C or below control during packing and storage is essential to prevent growth of any STEC that may be present, since an increase in numbers of STEC will increase the risk of illness.

5.4 Cold storage

Para 32.

Indonesia proposes to open the square brackets to give information on the recommended temperature to facilitate the implementation of the document. The paragraph will be read as follows:

32. Fresh leafy vegetables should be maintained at appropriate temperatures i.e., 7°C or below after cooling to minimize growth of any STEC that may be present. The temperature of the cold storage should be controlled, monitored and recorded.

11. RETAIL AND FOODSERVICE

Para 43.

Indonesia proposes to open the square brackets to give information on the recommended temperature to facilitate the implementation of the document. The sentence will be read as follows:

43. Fresh leafy vegetables (intact and pre-cut) should be held at a temperature that prevents growth of STEC i.e., 7°C or below. Cross-contamination from or to other food items should be prevented. Food business operators serving fresh leafy vegetables for consumption without cooking to consumers should take appropriate measures to

- prevent cross-contamination,

- maintain appropriate storage temperature, and
- ensure proper cleaning of tools and surfaces that may come in contact with these products.

AGENDA ITEM 8**CX/FH 22/52/8****Proposed Draft Guidelines for the Safe Use and Re-Use of Water in Food Production****General Comment**

Indonesia has an opinion that the term of “potable water” is more suitable and should be used throughout the document.

This term is commonly used in several Codex documents such as Code of Practice for Fish and Fishery Products; and Code of Hygienic Practice for Fresh Fruits and Vegetables.

Specific Comments:**Purpose and Scope**

Para 12.

In principle, Indonesia agrees with the purpose and scope as stated in paragraph 12. However, Indonesia seeks for clarification on whether the scope of the document will only cover microbiological criteria. If so, Indonesia proposes that the title should be adjusted to reflect that the document does not contain chemical and physical hazards to avoid misleading.

DEFINITIONS

Indonesia is of the view that the definition is not consistent between general part and its annexes. Indonesia proposes that the definition should only be included in the general part.