

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 5, 6, 7, 8

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
CODEX COMMITTEE ON FOOD HYGIENE  
Fifty-second Session  
Virtual  
28 February – 4 March and 9 March 2022  
Comments from the East African Community**

The East Africa Community (EAC) Secretariat appreciates the opportunity to provide comments on the different agenda items to be discussed by the 52<sup>nd</sup> Session of the Codex Committee on Food Hygiene.

## Agenda item 5

**CX/FH 22/52/5 Add.1)**

### **Draft guidance for the management of biological foodborne outbreaks at Step 7.**

#### **General Comment**

##### **Appendix I**

**Considering whether it is ready to be advanced to Step 8 for adoption by CAC45.**

**Position:** The EAC reviewed the revised guidance on management of biological foodborne outbreaks and found the guidance acceptable, and supports the advancement of the guideline in the step process to step 8 for adoption.

**Rationale:** The guidance is informative, clear and practical for the management of microbiological foodborne outbreaks

##### **Editorial comments**

##### **Para 6**

**Position:** The EAC suggests to correct “Bussioness” to Business

**Page 4, Para 10,** line 3, replace “Authority” with “Organisation” for WHO in the scope

**Position:** The EAC proposes to replace “Authority” in “World Health Authority” to read as “World Health Organisation”

**Rationale:** To harmonize with the already known abbreviation of WHO as an organisation

##### **Para 73**

**Position:** The EAC notices a repetition for “tracing” thus delete one.

## Agenda item 6

**CX/FH 22/52/6**

**Proposed draft Decision Tree (revision of the General Principles of Food Hygiene (CXC 1-1969) at Step 4.**

**Call for comments on the decision tree and/or CCP identification worksheet presented in Annexes 1 and 2 of CX/FH 22/52/6 and to comment on whether either of the two proposals are suitable for inclusion in the revised General Principles for Food Hygiene (CXC 1-1969).**

#### **General comment**

**Position:** The EAC finds the proposal acceptable and supports the inclusion of the two proposals in the General Principles for Food Hygiene. The modifications made to the questions of the CCP Decision Tree made it clearer, objective and straight forward. The EAC further supports the inclusion of the CCP determination worksheet for use in conjunction with the CCP Decision Tree, in order to address the concerns of question 1

of CCP Decision Tree.

**Rationale:** The proposed option is more suitable as its use is flexible in the entire food value chain

#### Agenda item 7

CX/FH 22/52/7

**Proposed draft Guidelines for the control of Shiga toxin-producing *Escherichia coli* (STEC) in beef, raw milk and cheese produced from raw milk, leafy greens, and sprouts at Step 4**

#### General Comment 1

**Call for comments to consider the proposed draft Guidelines, review the General section for completeness, and address, in particular, the outstanding issues in square brackets and provide a recommendation on whether it is ready for progression in the step procedure**

**Position:** The EAC supports the advancement in the step process the 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.

**Rationale:** The draft guidelines is adequate in addressing aspects of STEC in the various annexes.

#### Technical comment

##### Page 4, Section 4: Para 20: Definition of Indicator microorganisms

**Position:** The EAC proposes to consider **option 1** in the square brackets for the definition “microorganisms that are used to evaluate the microbiological status of food production and food control systems, including the evaluation of the quality or safety of raw or processed food products and the validation of the efficacy of microbiological control measures. Some hygiene indicator microorganisms are total bacterial counts, coliform or faecal coliform counts, total *E. coli* counts and counts of Enterobacteriaceae”

**Rationale:** The definition is quite clear and comprehensive

##### Appendix I, Page 5, Section 5.5 Microbiological and other specifications - para 35

**Position:** The EAC supports the option 1 that read as [Microbiological testing of fresh leafy vegetables and of water for primary production for STEC is currently of limited use due to low prevalence and low numbers.]

**Rationale:** Despite the low prevalence and numbers of STEC in water, the guidance on determining safe use of water for primary production is an important area that should be addressed.

#### Editorial Comment

##### Section 5.6, Documentation and records - para 34

**Position:** The EAC supports to the use of the wording: “It is recommended that”, harvesting, processing, production and distribution records should be retained long enough to facilitate STEC illness investigation and recalls if need.

**Rationale:** This is best practice that is presented as a recommendation to member states to adopt and implement

##### Section 10.3.1. Industry responsibility, Para 43

**Position:** The EAC supports to retain the word ‘Primary’ in the square brackets, but proposes to replace “industry” with FBO in the heading as well as the in the text; i.e. ~~Industry~~ FBO 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

**Rationale:** All Food business operators (FBOs) and not just industry have the primary role and responsibility for managing the food safety of their products and for complying with regulatory requirements relating to those aspects of food under their control.

##### Section 10.3.2, Para 45, Regulatory systems, Use of ‘Could’ or ‘Should’

**Position:** The EAC supports **option 1** in the square brackets for the definition “The competent authority **should** provide guidelines and other implementation tools to industry, as appropriate, for the development of the process control systems”.

**Rationale:** The role of the Competent Authority is to ensure that regulations and guidance documents are accessible to FBO and stakeholders along the food value chain.

**Section 11 Retail and Foodservice, para 43, whether to certain retain elements (e.g. Section 11 Retail and Food service and Flow charts) in Annex 2 on Fresh Leafy Vegetables,**

**Position:** The EAC supports the retention of section 11 and flow charts in annex 2

**Rationale:**

- [Section 11 is very informative] Food service and retail outlets are key points in the food chain where potential contamination of ready-to-eat foods such as fresh leafy vegetables consumed without cooking readily occurs. This information is important for consideration by the FBO
- The flow chart provides sufficient guidance for the user with the given process steps; and will also guide FBO to adapt the flow chart to their prevailing situations

**ANNEX 1- RAW BEEF****General comment 1**

**Review the general section for its completeness and the outstanding issues in square brackets addressed**

**Position:** The EAC supports the proposed draft guidelines for the control of STEC in raw beef, fresh leafy vegetables, raw milk, and raw milk cheeses, and sprouts

**Rationale:** The document is elaborate and contains adequate guidance for the management of STEC in raw beef, fresh leafy vegetables, raw milk and raw-milk cheeses, and sprouts

**ANNEX 2- FRESH LEAFY VEGETABLES****Technical Comment 1**

**Section 2.2 Definitions, Para 6, line 4 (para 19), [where the leaf is intended for consumption] or [that may be consumed]**

**Position:** The EAC supports option 1 in square brackets and propose to delete “where the leaf is” from the text. Revised text reads as “Vegetables of a leafy nature 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”

**Rationale:** The definition is aligned with the scope and objective of this guideline

**Technical Comment 2**

**Section 4.1, 5.4 and 11 (para 53), whether to consider use of [7°C or below]**

**Position:** The EAC supports to the use of 7°C or below after being confirmed by JEMRA.

**Rationale:** The temperature is ideal in inhibiting growth of the STEC pathogen while keeping the freshness of the raw leafy vegetables and assure safety.

**ANNEX 3, RAW MILK AND RAW MILK CHEESES**

**Comment on the structure and format of the annexes, in particular Annex 3 on Raw Milk and Raw Milk Cheeses**

**General comment 1,****Section 2**

**Position:** The EAC supports the objective but with a modification to include camel milk as well

**Rationale:** Camel milk is increasingly being consumed in many communities around the world

**General comment 3, Annex 3, whether it is ready for progression in the step procedure**

**Position:** The EAC reviewed the annex 3 and supports its progression in the step procedure

**Rationale:** The aspects addressed are detailed enough, informative and adequate

**Editorial comment**

**Section 5.1.1, para 12, line 14**

**Position:** The EAC notices a repetition of the word “farm practice” thus one should be deleted

**Technical Comment 1****Section 3.1, Para 7,**

**Position:** The EAC proposes to restructure the text to read as “This annex presents specific guidance for control of STEC related to raw milk and raw milk cheeses intended for consumption”

**Rationale:** The text becomes clear when the phrase “intended for human consumption” is used instead of “drunk”

**Agenda item 8****CX/FH 22/52/8****Proposed draft Guidelines for the safe use and re-use of water in food production at Step 4****General comment, Appendix I**

The EAC supports the proposed draft Guidelines as presented in Appendix I: The General Section and the annexes on Fresh Produce and Fishery Sector

**Appendix I****Technical comment**

**Indicate whether the term “potable water” rather than “drinking water” should be used throughout the document**

**Position:** The EAC supports the term ‘potable water’ to be used throughout the document

**Rationale:** Potable water is widely used as safe water to drink and/ or use for food production, and it is in line with the already existing codex texts where the term “Potable water” is used

**Annex I: Fresh Produce****Technical Comment 1**

**Overarching issues, to determine whether to keep in paragraphs 5 to 36 adapted to the scope of this guidelines, or to replace by a cross-reference to CXC 53-2003.**

**Position:** The EAC proposes to delete paragraphs 5 to 36 and instead make a cross-reference to CXC 53-2003 where applicable modifications are made

**Rationale:** Making a reference to an existing Codex document avoids repetition and leads to brevity of the current document.

**Technical Comment 2**

**Page16, Paragraph 57, Determine whether the tools (DT) are appropriate for the development of the document**

**Position:** The EAC supports the inclusion of tools (DT) appropriate for the development of the document as it is a useful guidance for decision-making

**Rationale:** They are considered to be useful risk management tools to assist stakeholders in making decisions on the water’s fitness for purpose at a given step in the supply chain.

**Technical Comment 3:**

**To indicate if it is considered appropriate to ask FAO/WHO if validation of the examples can be considered, as well as more concrete recommendations on thresholds and sampling frequencies.**

**Position:** The EAC considers it appropriate to request FAO/WHO to validate the examples as well as to provide more concrete recommendations on thresholds and sampling frequencies.

**Rationale:** Validation will provide assurance that the examples, thresholds and sampling frequencies are indeed useful.

**Annex II: Fishery Product****Technical Comment 4**

**Section 5: Definitions, to choose the most appropriate definitions for fishery products, harvesting and fit for purpose water, from the proposed definitions.**

#### **EAC positions**

- a) **“Fishery products”**: Any species of fish, including crustaceans, molluscs, gastropods, or part of them intended for human consumption

**Rationale:** To be consistent with the CXC 52:2003

- b) **“Harvesting”**- Operations involving taking the fish from the water

**Rationale:** To harmonize with the definition as captured on page 14, section 2.1 general definitions for already existing CXC 52:2003, Code of Practice for Fish and Fishery Products

- c) **“Fit for purpose water”**, Water whose safety requirements are determined by its use and will not confer any hazard at the point of application.

**Rationale:** It is brief and precise to the user

#### **Technical Comment 5:**

**To consider if the information provided in the annex so far is enough or to hold the document until the JEMRA expert report meeting on water use and reuse for fish and fishery products becomes available to include further information**

**Position:** The EAC proposes that the document is held until the JEMRA expert report meeting on water use and reuse for fish and fishery products becomes available to include further information

**Rationale:** The Codex standards should be based on scientific evidence. For this reason, having the up-to-date technical information contained in the document approved by the expert committee would be appropriate