



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

Comments of India

Agenda Item 5.1: Proposed draft Annex II on Fresh Leafy Vegetables at Step 4 (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)

India appreciates the work done by chair of the respective EWGs in drafting the Annex II on Fresh Leafy Vegetables at Step 4 (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).

India would like to propose a change in the words “*recall if needed*” to “*recall if applicable*” in the second sentence of paragraph 35.

Rationale: Recall is not possible in all cases particularly for loose vegetables sold in the market.

Agenda Item 5.2: Proposed draft Annex IV on Sprouts at Step 4 (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)

India appreciates and supports the work done by chair of the respective EWGs in drafting the Annex IV on Sprouts at Step 4 (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).

India would like to propose the addition of reference to the CODEX Guidelines for the validation of food safety control measures (CAC/GL 69 – 2008) as a validated method in paragraph 49 of the draft which states:

“Where feasible, sprout growers should treat the seeds used for sprouting with a method validated to reduce microorganisms of public health significance such as STEC”.

Rationale: It will be useful to refer to a CODEX standard to ensure the control of STEC and protect public health.

Agenda Item 7: Proposed draft revision on the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood (CXG 73-2010) at Step 4

India appreciates the work done by chair of the EWG- Japan in collaboration with the co-chair Chile for the revision on the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood (CXG 73-2010). India would like to propose following changes to the proposed document:

1. Editorial correction of “*V. fluvialis*” from “*V. fluviaris*” in paragraph 2.
2. The definition of clean water in paragraph 27 should be:

“*Water that does not meet the criteria for potable water but does not compromise the safety of the food*” in reference to the CXG 100-2023.

Rationale: Since this definition is already adopted in CXG 100-2023, its adoption will ensure unambiguity and avoid contradiction between standards.

3. India agrees on the following definition of seafood as proposed by the chair of the EWG during the vWG held on 26 February, 2024:

“Fish, shellfish, other aquatic invertebrates and seaweed from marine and freshwater sources and their products which are intended for human consumption.”

Rationale: Pathogenic *Vibrio* is found in species from the fresh water sources also and inclusion of these in the definition of seafood would be beneficial for protecting public health.

4. In paragraph 63, India does not support change of temperature *to limit growth for pathogenic Vibrio spp.* to 5 °C and proposes to retain the temperature as 10 °C

Rationale: The temperature change proposed is not supported by JEMRA or any other scientific references.

Agenda Item 8: Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food at Step 4

India appreciates and supports the work done by the chair of the respective EWGs in drafting the Guidelines for Food Hygiene Control Measures in Traditional Markets for Food.

India's views on the issues mentioned in para 8 and 10 under consideration by CCFH54:

- **Whether the title should be retained as “Guidelines for food hygiene control measures in traditional markets for food” or changed to “Guidelines for hygiene control measures in traditional markets for food”**
 - India recommends the title “Guidelines for hygiene control measures in traditional markets for food” as the Hygiene control measures might be perceived as more inclusive to personal and other hygiene control measures rather than the food hygiene control.
- **Whether this set of guidelines should adopt a guidelines structure, CoP structure, or the proposed unique structure;**
 - India is of the view that the document should follow the structure of Code of Practice as the existing regional standards for street food follow COP structure and it would be easy for the members to adopted the same.
- **Whether the structure and headings capture all the key issues to be addressed;**
 - India is of the view that the document covers all the key issues to be addressed. However, the document is found to be very prescriptive and might not be practical for small scale food business operators in traditional food markets. It is proposed that the document may provide flexibility to the national scenario.
- **Whether there are any other issues to be covered by the guidelines; and**
 - No other issues need to covered in the guidelines.
- **Considering the request of CAC46 to carefully consider the relationship between these guidelines and the existing four regional Guidelines/Codes of Hygienic Practice related to street food (e.g., CXG 22R-1997, CXC 43R-1995, CXC 71R-2013, CXC 76R-2017), whether these guidelines might be considered as complementary to or replacement for those existing texts.**
 - India supports that the document might be considered as complimentary to the existing texts as it also covers the street foods.
- **Recommend whether the document can be advanced in the Codex Step process**
 - India is of the view that the document requires revision to make it non-prescriptive and change of structure to CoP format before considering it for advancement in step process.

India's comments on the Appendix I under consideration by CCFH54:

Para 5.1.1 may be amended as “All food handlers in traditional markets for food should undergo daily ~~health~~ **hygiene** checks before handling food as well as a scheduled medical examination and, where necessary be certified and /or immunized.”

Para 5.3.2 may be amended as “Training on food hygiene should be conducted by the competent authorities or other institutions recognized by the competent authorities. Food ~~vendors~~ **handlers** should also be trained on their responsibility to offer safe and suitable food products to consumers.”

Para 5.3.3 may be deleted as the Para 5.3.2 covers the same.

Para 5.4 may be removed as the formation of associations is voluntary for the FBOs and doesn't fall under the purview of codex.

Para 6.2.1.1 may be amended as "be reviewed and approved beforehand by the competent authority, **wherever required**"

Para 7.4.13 may be amended as "Food intended for continuous serving should be kept at the ~~following recommended holding~~ **required temperatures as may be recommended by the national regulatory authorities** to minimize or prevent the growth of harmful microorganisms" to provide flexibility for different countries' conditions.

Agenda Item 9: Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (CXC 1-1969)

India supports support Option no. 3- Full structural and technical alignment with CXC 1-1969.

Rationale: since there are major revisions in General Principles of Food Hygiene which include the GHP and HACCP provisions, complete structural alignment is required. It will ensure complete review and provide consistency among Codex texts.