



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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Comments of Guyana

Agenda Item 6: Guidelines for the Safe Use and Reuse of Water in Food Production (Annex II on Fishery Products at Step 4 and Annex III on Dairy Products at Step 4) (CX/FH 24/54/7)

Guyana would like to thank the Electronic Working Group chaired by the European Union (EU) and co-chaired by Chile and the International Dairy Federation (IDF) for preparing the Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (Annexes on Water Re-Use in Fish and Fishery Products and on the Production of Milk and Milk Products).

i) Guyana believes the proposed draft Guidelines outlined in Appendix I offer a structured approach to ensuring water safety in food production, with specific focus on Annexes II to IV.

In Annex II, which pertains to Fish and Fishery Products, there's a notable emphasis on aligning structures with other annexes for coherence. Consistency in terminology, such as the use of "fish and fishery products" throughout the document, is highlighted as essential for clarity. The inclusion of figures based on JEMRA reports is seen as beneficial for enhancing comprehension and usability.

Moving to Annex III, which addresses the Production of Milk and Milk Products, there's general agreement among stakeholders (members of the EWG) regarding the proposed structure and definitions. Suggestions include adding "milk" to the title for clarity regarding primary production inclusion and replacing "dairy products" with "milk products" to align with established Codex practices. Guyana agrees that the redundant definitions should be removed to streamline the document. Members also advocate for the incorporation of specific limits proposed by JEMRA to bolster recommendations. Aligning terminology with the General Section is advised and supported for consistency. The initial draft's inclusion of an overview of technologies is appreciated, but members emphasize the importance of clarifying their relevance to dairy production. The proposal for a separate Annex IV dedicated to technologies is widely supported for its clarity and relevance across different sectors.

Finally, Annex IV, focusing on Technologies for Recovery and Treatment of Water for Reuse, is commended for its comprehensive coverage of relevant technologies across various food production sectors. Stakeholders appreciate the clarity and usability achieved by dedicating a separate annex to technologies. The relevance of these technologies to multiple annexes ensures their broad applicability, and their inclusion is seen as a result of careful consideration and stakeholder input.

Overall, the proposed draft Guidelines demonstrate a concerted effort to address water safety comprehensively in food production, with attention given to coherence, clarity, and stakeholder input throughout the document.

ii) a) Based on the content in Annex IV: Technologies for Recovery and Treatment of Water for Reuse, it is evident that the proposed annex offers significant benefits and aligns well with the objectives of the draft guidelines. The comprehensive coverage of technologies relevant to various food production sectors ensures that stakeholders have access to a wide range of options for water recovery and treatment. Dedicating a separate annex to these technologies enhances clarity and usability, allowing users to easily access and understand the recommendations without cluttering other sections of the document.

Moreover, the relevance of these technologies to multiple annexes underscores their importance and applicability across different food production contexts. This ensures that the guidelines remain practical and relevant to a broad audience. Additionally, the inclusion of stakeholder input indicates a thoughtful and collaborative approach to drafting the annex, suggesting that the proposed technologies have been carefully considered and deemed appropriate by relevant stakeholders.

Considering these points, Guyana agrees that maintaining Annex IV is appropriate and beneficial for the overall effectiveness of the guidelines. Its comprehensive coverage, enhanced clarity, broad applicability, and stakeholder endorsement make it a valuable addition to the document, supporting the promotion of water safety in food production practices.

As such, Guyana supports the draft guidelines and agrees it is appropriate to maintain annex IV.

b) Guyana believes that if the proposed Annex IV on Technologies for Recovery and Treatment of Water for Reuse is maintained as recommended, a restricted revision of the General Section to introduce a cross-reference to this new annex would be appropriate and beneficial.

The inclusion of a cross-reference in the General Section would serve to enhance the usability and accessibility of the guidelines. It would provide users with a clear pathway to access information on recommended technologies for water recovery and treatment without having to search extensively through the document. This approach ensures that stakeholders can easily locate relevant guidance, thus facilitating their implementation of appropriate measures to ensure water safety in food production.

Furthermore, a restricted revision would ensure that the General Section remains concise and focused on its primary purpose while still acknowledging the importance of Annex IV in addressing specific technical aspects related to water management. By maintaining a balance between clarity and comprehensiveness, the revised General Section can effectively guide users to additional resources and information without overwhelming them with unnecessary details.

As such, Guyana believes that introducing a cross-reference to Annex IV in a restricted revision of the General Section would serve to streamline access to relevant information, enhance the practicality of the guidelines, and support stakeholders in implementing effective water safety measures in food production practices.

ii) Guyana believes upon considering the documentation provided and the proposal to maintain Annex IV on Technologies for Recovery and Treatment of Water for Reuse, it would be appropriate to consider a restricted revision of Annex I on Fresh Produce to introduce a cross-reference to Annex IV.

Introducing a cross-reference would serve to enhance the relevance and applicability of Annex I by providing stakeholders involved in fresh produce production with access to information on technologies specifically relevant to water recovery and treatment. This would enable them to make informed decisions and implement appropriate measures to ensure water safety throughout the production process.

Identifying the most relevant technologies for Annex I would depend on various factors such as the type of fresh produce, production methods, and potential contamination risks. However, Guyana believes that some of the technologies that may be particularly pertinent to fresh produce production include:

1. Irrigation System Management: Techniques for optimizing irrigation practices to minimize water usage and reduce the risk of contamination.
2. Post-Harvest Washing and Disinfection: Methods for cleaning and disinfecting fresh produce to remove surface contaminants and improve safety.
3. Water Recycling Systems: Technologies for recycling and treating water used in fresh produce processing to reduce water consumption and minimize environmental impact.

It is our belief that by introducing a cross-reference and indicating relevant technologies in Annex I, stakeholders involved in fresh produce production can benefit from access to specific guidance tailored to their needs. This would enhance the practicality and effectiveness of the guidelines in promoting water safety throughout the fresh produce supply chain.

In conclusion, with the resolution of the proposed issues and the enhancements made to the draft guidelines, it is recommended that CCFH54 consider advancing the Annexes in the step process. These advancements signify a significant step forward in promoting water safety in food production and underscore the commitment to ensuring comprehensive and effective guidelines for the industry.

Agenda Item 8: Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food at Step 4 (CX/FH 24/54/9)

Guyana would like to thank the Electronic Working Group chaired by Kenya and co-chaired by Bolivia and Nigeria for preparing the Proposed Draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food.

In response to 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";

Guyana supports the proposed draft guidelines in Appendix 1. The document primarily focuses on hygiene control measures in traditional markets for food. While the term "food hygiene" is commonly used in such contexts, the document also emphasizes broader aspects of hygiene beyond just food handling, including waste disposal, sanitation, infrastructure, and consumer behaviour.

Given the comprehensive coverage of hygiene aspects, including those beyond food handling, Guyana believes that it is appropriate to retain the title as "Guidelines for food hygiene control measures in traditional markets for food." This title accurately reflects the document's scope and emphasizes the central theme of ensuring food safety in traditional market environments.

In response to whether this set of guidelines should adopt a guidelines structure, CoP structure, or the proposed unique structure;

Upon reviewing the document: Guidelines for Food Hygiene Control Measures in Traditional markets for Food, Guyana believes based on the content provided, that the guidelines follow a structured approach that combines elements of both guidelines and a Code of Practice (CoP). The document outlines specific requirements and recommendations for various aspects related to food hygiene control measures in traditional markets for food, resembling guidelines. At the same time, it includes detailed procedures and standards for implementation, which align with the characteristics of a Code of Practice.

Given the comprehensive nature of the content and the specific recommendations provided, **adopting a unique structure that combines elements from both guidelines and a Code of Practice seems appropriate.** This approach ensures clarity, comprehensiveness, and practicality in implementing the outlined measures for food safety in traditional markets.

In response to whether the structure and headings capture all the key issues to be addressed;

Guyana believes that the structure and headings cover a comprehensive range of key issues related to food safety and hygiene practices in traditional markets. To reiterate, the structure comprehensively covers the key aspects of food safety and hygiene in traditional markets, from regulatory requirements to practical measures for FBOs and consumers.

In response to whether there are any other issues to be covered by the guidelines;

Guyana believes that while the provided guidelines cover a wide range of important aspects related to food safety and hygiene in traditional markets, there are two additional issues that could be considered for inclusion:

1. **Emergency Preparedness:** Including provisions for emergency preparedness and response in the event of natural disasters, foodborne illness outbreaks, or other emergencies affecting food safety.
2. **Training for Market Inspectors:** Providing training guidelines for market inspectors responsible for enforcing food safety regulations and conducting inspections in traditional markets.

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.

Guyana believes that the request from CAC46 to consider the relationship between the provided guidelines and the existing four regional Guidelines/Codes of Hygienic Practice related to street food (CXG 22R-1997, CXC 43R-1995, CXC 71R-2013, CXC 76R-2017) raises important questions about the potential role and impact of the new guidelines. Below is Guyana's perspective on whether these guidelines might be considered as complementary to or replacements for the existing texts:

1. Complementary Nature:

- The new guidelines can be viewed as complementary to the existing regional Guidelines/Codes of Hygienic Practice related to street food.
- While the existing texts provide specific guidance and standards for street food vendors, the new guidelines can offer additional insights and recommendations tailored to the unique context of traditional markets.
- By incorporating elements from the existing regional guidelines and building upon them with updated information and best practices, the new guidelines can enhance food safety measures and address evolving challenges in traditional market settings.

2. Replacement Considerations:

- First it's essential to assess whether the new guidelines significantly improve upon or supersede the existing regional texts in terms of relevance, comprehensiveness, and effectiveness.
- If the new guidelines offer substantial advancements or address gaps not covered by the existing texts, there may be a case for considering them as replacements.
- However, outright replacement may not be necessary if the existing regional guidelines already provide comprehensive and effective guidance for street food hygiene control. In this is viewed as the case then Guyana believes that, the new guidelines could be viewed as supplementary resources rather than replacements.

3. Integration and Harmonization:

- Efforts should be made to ensure alignment and compatibility between the new guidelines and the existing regional texts.
- Wherever possible, elements from the existing regional guidelines can be integrated into the new guidelines to promote harmonization and consistency in food safety standards.
- Collaboration between relevant stakeholders, including regulatory authorities and food industry representatives, can facilitate the process of integrating and harmonizing guidelines to ensure coherence and clarity for all parties involved.

Guyana concludes that, while the new guidelines may offer valuable insights and enhancements to food hygiene control measures in traditional markets, their relationship with existing regional Guidelines/Codes of Hygienic Practice related to street food should be carefully assessed to determine whether they serve as complementary resources or potential replacements. Integration and harmonization efforts can promote consistency and effectiveness in food safety standards across different contexts.

Agenda Item 9: Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (CXC 1-1969) (CX/FH 24/54/10)

Guyana would like to thank the United Kingdom for the work done on the Alignment of Codex Texts Developed by CCFH with the Revised General Principles of Food Hygiene (CXC 1-1969).

Comments in response to questions posed:

Question 1: Guyana prefers 'option b'- new wording specific to the text being aligned is created, because this will allow for clarity and relevance.

Question 2: It is noted that a simple cross-reference may not be sufficient. Guyana proposed the addition of a summary or key points alongside the cross-reference may be better to ensure that readers grasp the significance of Section 7.

Question 3: It is noted that a simple cross-reference would be sufficient.

Question 4: Guyana considers it necessary to review paragraphs of text and determine whether the information included is beneficial to the text.

Question 5: It may be more appropriate to provide a specific cross-reference to CXC 1-1969 for each sub-heading rather than a single cross-reference to the main section.

Question 6: Guyana considers it necessary to ensure alignment with the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023).

Question 7: It is considered that the blank template (Appendix B) should consist of 'option 2- main headings and sub-headings'

Question 8: The alignment process should be streamlined to include only references relevant to the section of the CXC 1-1969 unless there are additional details relevant to individual guidelines.

Question 9: Guyana supports 'option 2'. This option promotes integration and coordination between technical revisions and alignment. Changes required as a result of alignment can be addressed directly within the EWG.