



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 Uganda

The Uganda appreciates the opportunity to provide comments on the different agenda items to be discussed by the 52nd Session of Codex Committee on Food Hygiene.

AGENDA ITEM 5: DRAFT GUIDANCE FOR THE MANAGEMENT OF BIOLOGICAL FOODBORNE OUTBREAK, AT STEP 7, (CX/FH22/52/5)

General Comment

Appendix 1

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

Position: Uganda reviewed the revised guidance on management of biological food borne 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. in the management of microbiological foodborne outbreaks

Editorial comment

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

Position: Uganda 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

AGENDA ITEM 6: PROPOSED DRAFT DECISION TREE (REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CXC 1-1969), (CX/FH 22/52/6)

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: Uganda supports the adoption of the revised decision tree as presented in Annex 1 for inclusion in the General Principles of Food Hygiene (CXC 1-1969)

Rationale:

- i) Decision tree is easier to understand and use by FBO as well as experts compared to the determination work sheet which involves text
- ii) In training industry players its easier to use a decision tree than a determination work sheet especially when dealing with HACCP

AGENDA ITEM 7: PROPOSED DRAFT GUIDELINES FOR THE CONTROL OF STEC IN RAW BEEF, FRESH LEAFY VEGETABLES, RAW MILK, AND RAW MILK CHEESES, AND SPROUTS, AT STEP 4, (CX/FH 22/52/7)

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: Uganda 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.

Comments

Section 4: Para 20: Definition of Indicator microorganisms

Position: Uganda 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

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

Position: Uganda 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.

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

General comment 1

Para 1

Uganda notices that the introduction is too detailed for an average user

Position: Uganda proposes to make the introductions brief to make it user friendly and easy to understand

Technical comment 1

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

Position: Uganda proposes to consider the second option in the square brackets for the definition “Vegetables of a leafy nature that may be consumed 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: Uganda observes that all leafy vegetables are intended for consumption

Technical comment 2:

Section 5.4, Cold storage, Para 32, whether to consider use of [7°C or below]

Position: Uganda supports to consider the use of 7°C or below.

Rationale: The temperature is ideal in inhibiting growth of the STEC pathogen while keeping the freshness of the raw leafy vegetables

Technical comment 3:

Section 11, Retail and foodservice, Para 43, whether to consider use of [7°C or below]

Position: Uganda supports to consider the use of 7°C or below

Rationale: Similar to Section 5.4 above, the identified temperature is ideal in inhibiting growth of the STEC pathogen while keeping the freshness of the raw leafy vegetables

General comment 2

Whether to retain certain elements (e.g. Section 11 Retail and Food service and Flow charts) in Annex 2 on Fresh Leafy Vegetables;

Position: Uganda 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. Therefore 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 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, whether it is ready for progression in the step procedure

General comment 1

Position: Uganda reviewed the annex 3 and supports its progression in the step procedure

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

Technical comment 1

Section 3.1, Para 7,

Position: Uganda 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: PROPOSED DRAFT GUIDELINES FOR THE SAFE USE AND RE-USE OF WATER IN FOOD PRODUCTION, AT STEP, (CX/FH 22/52/8)

General comment 1,

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

Position: Uganda supports the term ‘potable water’ to be used throughout the document.

Rationale: This is to be in line with 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: Uganda supports to cross refer with CXC 53-2003 where applicable

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

Technical comment 2

Page 16, Paragraph 57, determine whether the tools (DT) are appropriate for the development of the document

Position: Uganda agrees that the DT is a useful guidance for decision-making and examples are elaborate but they may be presented as information documents in order not to make the guideline so detailed and bulky

Rationale: It clearly illustrates when one needs to consider conducting tests on water and the frequency of testing the water

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: Uganda recommends that it’s appropriate to request FAO/WHO to validate the examples as well as recommendations on thresholds and sampling frequencies.

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

ANNEX II FISHERY PRODUCTS

Technical comment 1:

To choose the most appropriate definitions for fishery products, harvesting and fit for purpose water, from the proposed definitions in section 4.

Definitions

Position 1: Uganda proposes to consider **Definition 2 “Fishery products bis:** any cold-blooded aquatic animal, or any part or product derived therefrom, intended for food for human consumption, and includes any fish, crustacean, molluscs, echinoderm, holothurian, or aquatic reptile”

Rationale: It is broad enough to cover all aquatic animals used as food

Position 2: Uganda proposes to consider **definition 1, “Harvesting:** Operations involving taking the fish from the water”. However, we further propose to combine those definitions into one to read as “Capture and landing of fish from the water and growing areas

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

Position 3: Uganda proposes to consider definition 3, **“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 2

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: Uganda 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