

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 7

FH/47 CRD/8

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD HYGIENE

### Forty-seventh Session

Boston, Massachusetts, United States of America, 9 – 13 November 2015

### COMMENTS ON DISCUSSION PAPER ON THE NEED TO REVISE THE CODE OF HYGIENIC PRACTICE FOR FRESH FRUITS AND VEGETABLES (CAC/RCP 53-2003)

(Comments of El Salvador, Ghana, Malaysia, Mali, Nigeria, Senegal, Tanzania and African Union)

#### EL SALVADOR

##### Observaciones generales:

1. Se apoya la propuesta de Nuevo Trabajo para continuar revisando el “Código de Prácticas de higiene para las frutas y hortalizas frescas (CAC/RCP 53-2003)” con el objetivo de suprimir las redundancias/duplicaciones, revisar el ámbito aplicación y realizar enmiendas de forma, añadir definiciones y disposiciones específicas relativas a la higiene en los programas de limpieza y medio ambiente si se considera necesario.
2. El tema del establecimiento de parámetros para agua limpia, agua de calidad apta, etc., debe tratarse en un documento aparte. Se considera que si no hay parámetros de referencia, el concepto queda subjetivo.
3. Se apoya que el Código preliminar revisado, presentado como Apéndice II en el documento CX/FH 15/47/8, se distribuya como punto de inicio para la revisión en Nuevo trabajo.

#### GHANA

##### **Recommendation 1: The necessity to start a new work to continue revising the Code**

**Comments:** Ghana supports the revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables. This will help align the main Code and its annexes by addressing inconsistencies and duplications which may exist.

##### **Recommendation 2: How to address the issue raised in the eWG regarding the parameters for clean water according to its use**

**Comments:** Ghana recommends that the term “suitable quality water” should be synonymous with “clean water”, provided that the definition of clean water is expanded. We further suggest the development of specifications for clean water which must include microbiological requirements.

##### **Recommendation 3: If the draft revised Code (Appendix II) could be circulated as a starting point for the revision.**

**Comments:** Ghana supports the circulation of Appendix II of the Draft Revised Code as a starting point for revision. This will allow opportunities for more comments to be made to further improve the document.

##### **Additional Comments on the proposed draft Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) Appendix II**

Para 34 Types of water:

We propose the deletion of microbiological criteria and replacement with microbiological requirements i.e. Clean water – water that does not compromise food safety in the circumstances of its use and, therefore, may have different ~~microbiological criteria~~ microbiological requirements depending on the stage of production.

**Rationale:** The use of microbiological criteria is not appropriate in this context. The minimum microbiological requirement for clean water should be the absence of pathogens. Clean water should therefore be the minimum requirement for every stage of production of fruits and vegetables, regardless of the potential process that the product may undergo, to ensure adequate protection of public health and safety.

### 2.3 – Definitions:

para 13: *Biosolids*. The definition in the original Code of Practice should be maintained i.e. **Sludge and other residue deposits obtained from sewage treatment plants and from treatment applied to urban and industrial wastes (food industries or other types of industry)**.

**Rationale:** The original definition provides consistency and better clarity than the current definition.

para 33: *Standard Operating Practice*. Change “**standard operating practice**” to “**standard operating procedure**” as this is the standard terminology used.

## MALAYSIA

Malaysia supports the proposal for new work to revise the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003).

## MALI

### Observations d'ordre général:

Le Mali félicite le groupe de travail électronique dirigé par le Brésil et la France pour la préparation du document de travail. Il soutient sa progression à l'étape suivante de la procédure.

## NIGERIA

Nigeria recommends that the Code continues to be revised but not as *new work* – rather as a **First Edition**.

**Rationale:** Similar work that has been carried for the Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) which followed this route. A revised second edition of the Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) dated 2012, already exists.

This approach would maintain the link between the original document i.e. Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) and the revised Code. This also eliminates potential confusion.

Nigeria recommends the following position: The term “**suitable quality water**” should be synonymous with “**clean water**”, provided that the definition of clean water is expanded upon. Nigeria therefore supports the development of a list of parameters for clean water that include microbiological specifications/requirements.

Nigeria recommends replacing the term “**microbiological criteria**” with the term “**microbiological specifications**” or “**microbiological requirements**” as the term “**microbiological criteria**” is not appropriate in this context. The minimum microbiological requirement for clean water should be the absence of pathogens. Clean water should therefore be the minimum requirement for every stage of production of fruits and vegetables, regardless of the potential process that the product may undergo, to ensure adequate protection of public health and safety.

### Circulation of Draft Revised Code (Appendix II) as a starting point.

Nigeria supports the circulation of Appendix II of the Draft Revised Code as a starting point for revision.

**Rationale:** It will allow opportunities for more comments to be made to further improve the document.

## **ADDITIONAL COMMENT**

Nigeria supports recommendation that the following changes to be made to the listed sections below:

### 2.3 – Definitions

13: *Biosolids*. - Sludge and other residue deposits obtained from sewage treatment plants and from treatment applied to ~~adequate sources of~~ urban and industrial wastes (food industries or other types of industry).

**Rationale:** For consistency and to avoid confusion.

31: *Postharvest treatment* – activities performed incidental to packing, such as washing, sorting, culling, grading, ~~and~~ trimming and addition of permitted chemicals.”

**Rationale:** addition of various permitted chemical agents for a variety of purposes is a very important aspect of postharvest treatment.

33: Standard Operating ~~Practice~~ **Procedure** (SOP) - a detailed explanation of how a policy is to be implemented. The SOPs should contain full working instructions as well as information on applicability.

## SENEGAL

**Question:** La nécessité de réviser le Code d'usages pour les fruits et légumes frais (CAC / RCP 53-2003) est discutée.

Problèmes et analyse:

### **2.1 nécessité d'engager de nouveaux travaux pour poursuivre la révision du Code.**

**Position:** Le Sénégal recommande que le Code continue d'être révisé, mais pas en tant que nouvelle activité - plutôt comme une première édition. La justification de cette proposition est basée sur un travail similaire qui a été fait pour le Code d'usages pour les poissons et produits de la pêche (CAC / RCP 52-2003) qui a suivi cette voie. Une deuxième édition révisée du Code d'usages pour les poissons et produits de la pêche (CAC / RCP 52-2003) daté 2012, existe déjà. Cette approche permettrait de maintenir le lien entre le document d'origine à savoir le code d'usages pour les fruits et légumes frais (CAC / RCP 53-2003) et le Code révisé. Cela élimine également le risque de confusion.

### **2.2 Aborder la question de l'élaboration d'une liste de paramètres pour l'eau potable en fonction de son utilisation et de l'utilisation du terme «eau de qualité appropriée».**

**Position:** Le Sénégal recommande la position suivante: Le terme «eau de qualité convenable» devrait être synonyme de «eau propre», à condition que la définition de l'eau propre soit complétée par des indications. Le Sénégal soutient donc le développement d'une liste de paramètres pour l'eau propre comprenant des spécifications / exigences microbiologiques. Le Sénégal propose de remplacer le terme «**critères microbiologiques**» par le terme «**spécifications microbiologiques**» ou «**exigences microbiologiques**» car le terme «critères microbiologiques» ne convient pas dans ce contexte. L'exigence minimale microbiologique pour l'eau potable devrait être l'absence de pathogènes. L'eau potable doit donc être une exigence minimale pour chaque étape de la production de fruits et légumes, indépendamment du traitement éventuel que le produit peut subir, pour assurer une protection adéquate de la santé et de la sécurité.

### **2.3 Circulation de projet de code révisé (Annexe II) en tant que point de départ.**

**Position:** Le Sénégal soutient la circulation de l'Annexe II du projet de code révisé comme point de départ de la révision. La raison en est que cela permettra d'avoir des possibilités d'apporter plus de commentaires en vue d'améliorer encore le document.

### **2.4. Commentaires supplémentaires.**

**Position:** Le Sénégal suggère que les modifications suivantes soient apportées aux sections énumérées ci-dessous:

**2.3 (a) - Définitions - Numéro 13: biosolides.** La définition dans le Code d'origine de la pratique devrait être maintenue comme tel « d'autres dépôts de résidus obtenus à partir des usines de traitement des eaux usées et de traitement des déchets urbains et industriels (industries alimentaires ou d'autres types d'industrie) et de boues. » Cette définition originelle permet d'assurer la cohérence et d'éviter toute confusion, alors que les ajouts actuels à la définition du projet de code-tels que "..... **sources adéquates de ....**" Peuvent poser. L'insertion ... .. "~~des sources adéquates de~~" ... ..devrait donc être supprimée.

**2,3 (b) - Définitions - Numéro 31:** le traitement post-récolte. La définition actuelle énumère un certain nombre d'activités comme des exemples pouvant être acceptés. Cependant, un aspect très important du traitement post-récolte est l'addition fréquente des divers produits chimiques autorisés à des fins variées. Cet aspect doit être ajoutée à la liste des exemples. Le nouveau texte proposé est: «les activités réalisées accessoire à l'emballage, comme le lavage, le tri, le classement et le parage **et ajout de produits chimiques autorisés.**»

**2.3 (c) - Définitions - Numéro 33:** pratique opératoire standard. Le mot «pratique» devrait être remplacé par le mot "**procédure**" que le terme exact est «**Procédure opératoire Standard** », selon la définition donnée.

## TANZANIA

2.1 Necessity to start a new work to continue revising the Code.

**Tanzania Position:** Tanzania recommends that the Code continues to be revised but not as *new work* – rather as a **First Edition**. The reason for this proposal is based on similar work that has been done for the Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) which followed this route. A revised second edition of the Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) dated 2012, already exists. This approach would maintain the link between the original documents i.e. Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) and the revised one. This also eliminates potential confusion to users.

2.2 Addressing the issue of developing a list of parameters for clean water according to its use and the use of the term “suitable quality water”.

**Tanzania Position:** Tanzania recommends the following: The term “**suitable quality water**” should be synonymous with “**clean water**”, provided that the definition of clean water is expanded. Tanzania supports the development of a list of parameters for clean water that include microbiological specifications / requirements. Also Tanzania suggests replacing the term “**microbiological criteria**” with the term “**microbiological specifications**” or “**microbiological requirements**” as the term “**microbiological criteria**” is not appropriate in this context. The minimum microbiological requirement for clean water should be the absence of pathogens. Clean water should therefore be the minimum requirement for every stage of production of fruits and vegetables, regardless of the potential process that the product may undergo to ensure adequate protection of public health and safety.

2.3 Circulation of Draft Revised Code (Appendix II) as a starting point.

**Tanzania Position:** Tanzania supports the circulation of Appendix II of the Draft Revised Code as a starting point for revision. The reason is, it will allow opportunities for more comments to be made to further improve the document.

2.4. Additional comments.

**Tanzania Position:** Tanzania suggests that the following changes are made to the listed sections below:

(a) 2.3 – Definitions – number 13: *Biosolids*. The definition in the original Code of Practice should be maintained i.e. **Sludge and other residue deposits obtained from sewage treatment plants and from treatment applied to urban and industrial wastes (food industries or other types of industry)**. The reason for reverting to the original definition is to provide consistency and to remove confusion, which the current additions to the definition in the Draft Code i.e. “.....adequate sources of....” may pose. The insertion ..... “~~adequate sources of~~” .....should therefore be deleted.

(b) 2.3 – Definitions – number 31: *Postharvest treatment*. The current definition lists a number of activities as examples which is accepted. However, one very important aspect of postharvest treatment is the frequent addition of various permitted chemical agents for a variety of purposes. This aspect should be added to the list of examples. The suggested new wording is: “activities performed incidental to packing, such as washing, sorting, culling, grading, ~~and~~ **trimming and addition of permitted chemicals.**”

(c) 2.3 – Definitions – number 33: *Standard Operating Practice*. The word “**Practice**” should be replaced by the word “**Procedure**” as the correct term is “**Standard Operating Procedure**” according to the definition given.

## **AFRICAN UNION**

2.1 Necessity to start a new work to continue revising the Code.

**A.U. Position:** The AU recommends that the Code continues to be revised but not as *new work* – rather as a **First Edition**. The rationale for this proposal is based on similar work that has been done for the Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) which followed this route. A revised second edition of the Codex Code of Practice for Fish and Fishery Products (CAC/RCP 52-2003) dated 2012, already exists. This approach would maintain the link between the original document i.e. Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) and the revised Code. This also eliminates potential confusion.

2.2 Addressing the issue of developing a list of parameters for clean water according to its use and the use of the term “suitable quality water”.

**A.U. Position:** The AU recommends the following position: The term “**suitable quality water**” should be synonymous with “**clean water**”, provided that the definition of clean water is expanded upon. The AU therefore supports the development of a list of parameters for clean water that include microbiological specifications / requirements. The AU suggests replacing the term “**microbiological criteria**” with the term “**microbiological specifications**” or “**microbiological requirements**” as the term “**microbiological criteria**” is not appropriate in this context. The minimum microbiological requirement for clean water should be the absence of pathogens. Clean water should therefore be the minimum requirement for every stage of production of fruits and vegetables, regardless of the potential process that the product may undergo, to ensure adequate protection of public health and safety.

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(c) 2.3 – Definitions – number 33: *Standard Operating Practice*. The word “**Practice**” should be replaced by the word “**Procedure**” as the correct term is “**Standard Operating Procedure**” according to the definition given.