

## ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR

### THE 54<sup>th</sup> SESSION OF CODEX COMMITTEE ON FOOD HYGIENE (CCHF54)

11 – 15 March 2024 • Nairobi, Kenya

#### Objectives

This document offers an analysis of agenda items to support participation to the 54<sup>th</sup> session of the Codex Committee on Food Hygiene (CCFH54), taking place in March 2024.

The document is intended for possible use by the Codex communities of practice promoted by the Global Food Regulatory Science Society (GFORSS) as part of their contribution to enhancing awareness and supporting effective participation in international standard setting meetings (Codex meetings) by representatives from members and observers.

This document will offer an analysis of select key agenda items to support the development of positions at the national and regional level.

This analysis is indicative in nature and does not represent an official position of the organization, its membership or its management.

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## Agenda Item 5: 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 – Proposed draft Annex II on fresh leafy vegetables and Annex VI on sprouts

Documents: CX/FH 24/54/5; CX/FH 24/54/6

### Background

CAC46 adopted the proposed draft Guidelines for the control of STEC and the annexes on raw beef and raw milk and milk cheeses (CXG 99-2023). The annexes on leafy vegetables and on sprouts were returned to Step 2/3 for redrafting and circulation for comments, and an EWG was established (chaired by Chile, and co-chaired by New Zealand, Kenya and USA).

### Comments

#### Annex II: Leafy vegetables

The annex is clear and thorough. The information provided would be of great use to leafy greens producers in our region. Only 2 minor comments are noted:

- Section 3.1.1, para. 11: “although guidelines exist for the distance between fields and nearby animal operations, ...”. We recommend adding a reference to the cited guidelines.
- Figure 1: Replace “dewatering” with “removal of water” to be consistent with the change made in the previous round of consultation to the text in section 5.3.

#### Annex IV: Sprouts

The annex is clear and thorough. The information provided would be of great use to sprouts producers in our region. The only minor comment noted would be to replace “De-water” with “Removal of water” in Figure 1, to be consistent with the leafy vegetables annex.

### Recommendations

We recommend that both proposed drafts (Annexes II and IV of CXG 99-2023) advance to Step 5/8 for final adoption.

## Agenda Item 6: Guidelines for the safe use and reuse of water in food production and processing (Annex II on fishery products at Step 4 and Annex III on dairy products at Step 4)

Documents: CX/FH 24/54/7

### Background

CAC46 adopted the proposed draft General Section of the Guidelines for the safe use and reuse of water in food production and processing, and its Annex I (Fresh product). CCFH53 established an EWG (chaired by EU, co-chaired by Chile and the International Dairy Federation) to further develop Annex II (Fishery products) and initiate the development of Annex III (Milk and milk products). Annex II has been through one round of comments and revision, and Annex III, through two rounds. The overview of technologies for the recovery and treatment of reuse water, which was originally part of Annex III, is now presented in a separate Annex (IV), as it was noted during the review process that this information is relevant for the different annexes, not only the one related to milk.

### Comments

#### Annex II: Fishery products

The annex text is clear and thorough. However, although it was noted that the figures were redone as part of the review process, the decision trees could still be improved for clarity. These are important tools for the annex users and should be made as clear as possible. For example, in Figure 1, the red arrow out of question 2 says “Yes to 2, 3 and 4”, when it should be only “Yes”, since if you answer “Yes” to this question, you do not need to answer questions 3 or 4. Also, the use of different colors for the “Yes” arrows is confusing, as well as the different boxes for the same

outcome (3 different “faecal pathogen” boxes with 3 different colors, when it could be one box of one color for all). The bubble “Seasonality” in question 4 should be clarified. In Figure 3, the blue arrow has no text, and it is not clear where it starts or where it ends.

### Annex III: Milk and milk products

The annex contains very detailed and useful information; however, it is lengthy, and some sections are generic rather than specific to milk. For example, paragraphs 41 to 43 also apply to other types of operations, and section 44 likely applies to all operations storing water. This content may be moved to the main text of the Guidelines or, as relevant, to Annex IV. Also, some overlap was noted between para. 20 and paras. 25 and 26. This information could be consolidated in one place in Annex III.

Minor adjustments to some figures and tables are also suggested. Specifically, the numbers in Figure 1 (e.g., 5.1.1, 5.1.3, 5.2.1) require clarification. In Figure 3, it is not clear how the answers to questions 1, 2 and 3 should be integrated in the process flow. Table 1, in the general way it is presented, may be removed; alternatively, it could be developed as full example for a specific case.

Finally, the examples presented starting in para. 68 are summaries of examples fully developed in Annex 4 of MRA40. To lighten the text, the reader could be directly referred to this document, perhaps only with a shorter summary of the example, and without the figures.

### Recommendations

We recommend that the proposed draft for Annex II (Fishery products) advances to Step 5/8 for final adoption.

Although some comments were noted for Annex III (Milk and milk products), they are mainly about reorganizing or simplifying the already reviewed text. Therefore, it could also advance to Step 5/8 for final adoption.

## Agenda Item 8: Proposed draft Guidelines for food hygiene control measures traditional markets for food at Step 4

Document: CX/FH 24/54/9

### Background

As agreed during CCH53, and EWG (chaired by Kenya and co-chaired by Bolivia and Nigeria) prepared a draft of the Guidelines for food hygiene control measures traditional markets for food, which went through two rounds of comments and reviews. The proposed draft heavily borrows from various regional codes of practice and guidelines.

### Comments

Responses to specific questions (para. 8 of CX/FH 24/54/9):

- The title “Guidelines for hygiene control measures in traditional markets for food” may be more appropriate.
- The guidelines should adopt a guidelines structure. Codes of practice may be developed based on these guidelines by local authorities.
- The structure and headings capture all the key issues to be addressed, but some suggestions are mentioned in the comments below.
- No other issues to be covered by the guidelines are suggested at this moment, but further development of some is suggested in the comments below.
- 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:

This is a very important point. The existing guidelines and codes of practice (e.g., CXG 22R-1997 - Africa, CXC 43R-1995 - Latin America and the Caribbean, CXC 71R-2013 - Near East, CXC 76R-2017 - Asia) refer to street-

vended foods, which could be prepared/sold by merchants in individual stalls, but also in locations such as markets where several stalls are present. The differences between these existing documents are small and are not due to inherent regional differences in the way street-vended foods are produced or sold. Indeed, food safety and hygiene requirements for these foods should be universal, and similar capabilities and/or limitations are expected for street food producers regardless of the region. Therefore, a unified document, applicable to all regions, for street-vended foods seems logical.

The draft presented has a broader scope, as it refers to *markets* rather than *foods*. It expands on subjects such as facilities layout and design, that would not be applicable to individual food stalls. As was done in the draft presented, it makes sense to integrate the content of existing regional documents on street-vended foods into a universal document on foods sold in traditional or street markets. This document should replace existing regional guidelines/codes of practice on this matter.

#### Other Comments

The document shows good progress but could still be improved. Overall, some issues require clarification or further adaptation to the context of foods produced/sold in traditional markets. Also, reference to foundational Codex food hygiene texts would strengthen the document.

- Para. 2.2.1: This guideline is not subject to compliance or enforcement by government agencies.
- Some content is applicable to food production operations in general and it is not clear in the text whether special adaptations to food sold in markets would be required (e.g., several paragraphs in Section 4).
- Section 4.2 should refer the reader to Section 6 for further details.
- Sections 6 and 7: Are there any Codex references that could be added?
- Para. 4.4.1; 5.1; 5.2: Are there any Codex references that could be added?
- Para. 5.5.2 (record keeping); 5.5.5 (complaint management), 7.1.7 (traceability), 9.1.1 (monitoring and evaluation systems): Street vendors or traditional market vendors are unlikely to have these control measures in place. More guidance would be needed to encourage adoption.
- Traceability is an important issue that requires special guidance and adaptation if it is to be applied to foods sold in street markets. This item should be further developed in the document.
- Para. 5.5.7: Requiring vendors to provide allergen information to consumers should be highlighted in a separate paragraph. For unpackaged foods, it should also be added whether this information should be provided verbally, through signs next to the concerned food, etc.

#### Recommendation

We recommend that a new draft is prepared and circulated at Step 4

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

Document: CX/FH 24/54/10

#### Background

CAC45 adopted the latest (extensive) revision of the *General Principles of Food Hygiene* (CXC 1-1969) and requested that CCFH undertake work on the alignment of all food hygiene texts with this latest version – as they no longer follow the same format as, or cross-reference correctly to CXC 1-1969. The United Kingdom agreed to provide options for the approach for the alignment, with the purpose of creating consistency among texts and not to alter the standards. CCFH texts were categorized in four categories:

- Texts which do not require alignment (8) due to their specific nature,

- Texts that are part of the forward work plan and are either undergoing or expected to undergo revisions through an EWG (6), e.g., *Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood* (CXG 73-2010)
- Texts not currently part of the forward work plan for revision (18) e.g., *Code of Hygienic Practice for Low-Moisture Foods*
- New texts that are currently being drafted e.g., *“Food Hygiene Control Measures in Traditional Food Markets”*.

Three alignment options were proposed:

- Option 1: Simple alignment. Existing documents are revised with updated references to the correct sections of CXC 1-1969,
- Option 2: Full structural alignment. Option 1 plus structural alignment to CXC 1-1969.
- Option 3: Full structural and technical alignment with CXC 1-1969. Option 2 plus review of definitions and their impact on the document, review of sections to propose areas where texts can be streamlined to refer to CXC 1-1969, but no technical changes based on updated science and evidence.

Considering the time-consuming nature of this work, it was recommended to prioritize the work and to create a standing working group.

### Comments

Given the foundational nature of CXC 1-1969, and the extensive revisions its latest version reflects, it is important to fully support the alignment of **existing CCFH texts to this updated version and the creation of a dedicated working group**. However, the amount of work this task requires is very important and it will be crucial to prioritize texts for alignment.

Regarding **alignment options**, we suggest considering Option 2 (Full structural alignment), with the addition of a note indicating the document’s references and structure have been aligned to CXC 1-1969, but it has not undergone a technical update. Option 3, although ideal, would unavoidably trigger or highlight the need for a technical review, which should be tracked as a separate task.

### Responses to specific questions:

1. Question 1: If the text being aligned does not include some sections of the new structure adopted by CXC1-1969 should we:

- Option a: make a simple cross-reference to the section
- Option b: develop new text or new wording to align with the new structure

**Option “a” (simple cross reference to CXC 1-1969) is considered sufficient.**

2. Question 2: For section 7 of the Code related to Introduction and Control of food hazards, should we make a general reference to the Section, where it is missing from the text or be explicit with relevant development of measures

**A simple cross-reference to Section 7 of CXC 1-1969 is considered sufficient, given that we suggest applying alignment Option 2. Further modifications would fall under a technical revision of the document.**

3. Question 3: Should we elaborate “objectives” and “rationale” in the texts to be aligned or simple cross reference is sufficient

**A simple cross-reference to CXC 1-1969 is considered sufficient; given that we suggest applying alignment Option 2. Further modifications would fall under a technical revision of the document.**

4. Question 4: If there is no reference in the text to be aligned to Section 12.1 on Personnel, illnesses and transmission possibilities through food, should we review the text to ascertain whether such information is included with precision – or simply cross reference.

**We suggest maintaining any existing text along with the new cross-reference to Section 12.1 of CXC 1-1969. Further modifications or exclusions would fall under a technical revision of the document.**

5. Question 5: for some texts like 73-2010, should we have specific sections related to the Establishment and associated measures with specific sub-headings or have a generic and single cross reference

**A single cross-reference to CXC 1-1969 is considered sufficient, without listing out each sub-heading**

6. Question 6: Should the alignment being considered also include alignment with Alignment with CXG 100-2023 related to “Guidelines Safe Use and Re-use of Water in Food Production and Processing”

**Alignment with CXG 100-2023 is also important and relevant, however this guideline impacts more than CCFH standards – Alignment with CXG100-2023 should be part of a different task, as other documents (not CCFH only) may also be affected.**

7. Question 7: This question related to the implementation of Option 3 of the alignment and the proposal of a skeleton of the aligned text, where it is possible to have a blank template developed with either only headings (option 1) or headings and sub-headings (option 2)

**The blank template should consist of main headings and sub-headings (Option 2). This option is more precise and in line with the more comprehensive alignment under Alignment Option 3 (structural alignment + content alignment)**

8. Question 8: Should the alignment process replace text with updated text from the CXC 1-1969 or should it be streamlined to include only references to relevant the section of the CXC 1-1969.

**The alignment process should not replace text**, as this should be part of a technical review. Only the addition of references to the relevant section of CXC 1-1969 should be considered.

9. Question 9: For texts being updated as part of a forward plan – should the alignment work with CXC1-1969 be carried out as part of the same task i.e., by the same EWG or be carried out separately, after the technical review is completed.

**For text that are being revised or are included in the CCFH forward work plan, It is preferred that work on alignment be carried out within the same existing EWG (Option 2).**

**The other option (Option 1) can also be justified, to ensure consistency in the alignment process (i.e., carried by the same EWG tasked with alignment only)**

10. Question 10: For the 18 CCFH texts that are not part of the forward plan for CCFH review, what should be the criteria for prioritization of alignment? Length, age of the text etc.

**18 texts, in 6 languages each, are currently not captured in the forward plan. We suggest these texts be prioritized, in a preliminary phase, based on the importance of the commodities they describe within the global food production system. For example, CXC 53-2003 (fresh fruits and vegetables) or CXC 57-2004 (milk and milk products) could have priority over CXC 19-1979 (radiation) or CXC 30-1983 (frog legs). Subsequent prioritization could consider document length (shorter first) or number of citations of the document in international references (most cited first).**