

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Items 1, 2, 3, 5.1, 5.2, 6, 7, 8, 9, 10, 11, 12, 13

CRD29

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

#### Comments of Burundi

The Republic of Burundi appreciates the opportunity to provide comments on different agenda items to be discussed by the 54th Session of the Codex Committee on Food Hygiene (CCFH54). The following are the comments from the Republic of Burundi for consideration.

#### Agenda Item 1: Adoption of the Agenda (CX/FH 24/54/1)

Burundi supports the adoption of the Provisional Agenda items as circulated.

#### Agenda Item 2: Matters referred by the Codex Alimentarius Commission and/or other Codex Subsidiary Bodies to the Committee (CX/FH 24/54/2)

Burundi takes note of matters arising from 46<sup>th</sup> sessions of the Codex Alimentarius Commission (CAC46) and its executive committee (CCEXEC84, and CCEXEC85) and other Codex Subsidiary bodies relating to the Codex Committee on Food Hygiene such as the request of CCMAS42, and notes issues raised by CCFL47.

#### Agenda Item 3: Matters arising from the Work of FAO and WHO (including JEMRA) (CX/FH 24/54/3)

Burundi takes note of the matters arising from the work of FAO and WHO including those from JEMRA. Notably the operationalization of sharing of laboratory and epidemiological data, nationally, regionally, and internationally will improve the understanding and control of foodborne viruses. In addition, there is a need for member countries to develop regulatory frameworks that will enhance data sharing and protection

#### Agenda Item 5.1: 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 (CXG 99-2023): Proposed draft Annex II on Fresh Leafy Vegetables (CX/FH 24/54/5)

Burundi thanks the EWG chaired by Chile and co-chaired by New Zealand, Kenya, and USA for this work. It further supports that the proposed draft Annex 2 on Fresh Leafy Vegetables to be advanced in the Codex Step process

#### Para 4

**Editorial comment:** Burundi proposes an editorial amendment by addition of 'for' to the last statement in the para to read'

"The objective of this Annex is to provide guidance to reduce the risk of foodborne illness from STEC associated with fresh leafy vegetables intended for human consumption without cooking, during primary production, harvesting, packing, processing, storage, distribution, marketing, and **for** consumer awareness."

**Rationale:** The addition of for in the statement brings clarity.

**Para 17**

**Editorial comment:** Burundi proposes an editorial amendment to where references are used with the **removal of brackets** in the last statement.

...(~~Refer to section 3.2.1.1.3 of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CXC 53-2003).~~)”

**Rationale:** For consistency within the document

**Para 18**

**Editorial comment:** Burundi proposes an editorial amendment to the para to read:

...STEC can persist in these materials for weeks or even months if treatment is inadequate. **Anaerobic digestion and** ~~G-composting~~ can be effective in controlling STEC in manure, depending on factors that include time, temperature, indigenous microorganisms, moisture, **compost** composition ~~of the compost~~, pile size, and turning of the pile. ~~Another manure treatment method involves anaerobic digestion.~~ Treatment methods should be validated to inactivate STEC. Refer to section 3.2.1.2 of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CXC 53-2003) for practices to minimize contamination of fresh leafy vegetables with microbial pathogens such as STEC in manure, biosolids, and other natural fertilizers.

**Rationale:** Anaerobic digestion is one of the manure treatment methods

**Para 22**

**Editorial comment:** Burundi proposes an editorial amendment to the para with sentence three inserted in between statements 1 and 2 to read:

Fresh leafy vegetables should be stored and transported under conditions that will minimize the potential for STEC contamination and/or growth and noting that containers are often open-topped and stacked. **When vehicle receptacles or containers have been used for the transport of products other than fresh leafy vegetables, effective cleaning and disinfection should be carried out between loads to avoid cross-contamination.** Fresh leafy vegetables should not be transported in vehicles previously used to carry potentially contaminated materials (e.g., heavily soiled root vegetables, live animals, animal manure, compost, or biosolids). ~~When vehicle receptacles or containers have been used for the transport of products other than fresh leafy vegetables, effective cleaning and disinfection should be carried out between loads to avoid cross-contamination.~~

**Rationale:** For Clarity and flow

**Para 26**

**Editorial comment:** Burundi proposes that all wording after recorded be deleted to avoid repetition since the wording in the square brackets imply the same thing

**Para 27**

**Editorial comment:** Burundi suggests to delete ‘in wash water’. The text will now read as follows:

The washing of fresh leafy vegetables should follow good hygienic practices (GHPs) to prevent or minimize the potential for the introduction or spread of STEC ~~in wash water~~

**Rationale:** To align with the rest of the texts

**Para 30**

**Editorial comment:** Burundi proposes an editorial amendment to the para by deleting ‘es’ from the word illness

**Rationale:** The subject matter is the risk rather than the types of illnesses that can occur.

**Para 31**

**Editorial comment:** Burundi proposes an editorial amendment to the para by deletion of the first “cutting”

from the statement

**Rationale:** For clarity, knives are cutting tools

#### Para 32

**Editorial comment:** Burundi proposes an editorial amendment to the para by replacing 'for' with 'in' and deletion of 'see' and replaces it with 'Refer to' in the statement to read.

Washing and removal of water/drying are important steps in the control of STEC ~~infer~~ fresh-cut leafy vegetables. ~~See~~**Refer to** Section 4.3 above...

**Rationale:** For consistency

#### Para 44

**Editorial comment:** Burundi proposes an editorial amendment by addition of a **colon** at the end of the para to read...

Fresh leafy vegetables (intact and pre-cut) should be held at an appropriate temperature to minimize growth of STEC. Cross-contamination from or to other food items should be prevented. Food business operators serving fresh leafy vegetables for consumption without cooking to consumers should take appropriate measures to:

#### Figure1: Process Flow for Fresh Leafy Vegetables

**Technical comment 1:** Burundi proposes the inclusion of production site selection as a process step before soil preparation

**Rationale:** Environmental factors surrounding the production site may have an effect on the safety and quality of the final product. Further, subsequent interventions would not be sufficient to fully remove STEC contamination that occurs during primary production.

**Technical comment 2:** Burundi also notes that the EWG report had indicated that the word '**dewatering**' be replaced with '**removal of water**' which has not been effected in the flow diagram

**Agenda Item 5.2: 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 (CXG 99-2023): Proposed draft Annex IV on Sprouts (CX/FH 24/54/6)**

**General comment:** Burundi appreciates the work done by the EWG, chaired by Chile and co-chaired by New Zealand, Kenya, and USA and proposes that the draft Annex 4 on Sprouts be advanced in the Codex Step process with the inclusion of the following comments

#### Para 6

**Editorial comment:** Burundi proposes editorial amendment to para by replacing '~~addressing~~' with '**for**'.

**Rationale:** For clarity and emphasis

#### Para 43

**Editorial comment:** Burundi proposes proper numbering of para 43 since it is repeated as para 42 and the subsequent numbering to change throughout the whole document

#### Para 44

**Editorial comment:** Burundi proposes editorial amendments to para by deleting 'with fit for purpose water' in para 44 to read.

...Repeat the process ~~with fit for purpose water~~ until the dirt or debris are removed and rinse water remains

clear.

**Rationale:** The process of repeating is already captured in the first sentence.

### Scope

**Technical comment:** Burundi takes note of the application of the scope where microbicidal treatment is not allowed yet at section 5.4 Treatment and pre-germination soak of seeds for sprouting, allows the use of chemical methods in para 47 and other Physical treatments in para 48 which are microbiocidal. BURUNDI, therefore seeks clarification on the same as it lacks consistency

### Section 9

**Editorial comment:** Burundi proposes that the bullet under Training in section 9 should be given an independent number and the word 'nature' added to read:

All personnel involved in the production and handling of seeds for sprouting or sprouts across the supply chain should receive training on the principles of food hygiene and food safety, in particular the high-risk nature of sprouts and the illness associated with them, as well as personal health and hygiene requirements.

**Rationale:** For the flow of the sentence

### Para 78

**Editorial comment:** Burundi proposes that 'and recorded' be added to para 78 to read:

...Temperatures should be monitored and recorded

**Rationale:** Indicates the evidence of monitoring

### Para 80, Figure 1: Sprouts flow diagram

**Technical comment:** Burundi seeks clarification on the meaning of **deposit** in the flow diagram

### 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)

**General comment:** Burundi appreciates the effort of the EWG chaired by the European Union to develop this guideline and the annexes and agrees with the proposed draft Annex IV on Technologies for the recovery and treatment of water for reuse and appropriate to maintain it. Annex IV gives provisions for options for technologies for the recovery and treatment of water for reuse.

### Para 17, page 3, CCFH54 is invited to consider:

- i. the proposed draft Guidelines as presented in Appendix I: Annexes II to IV, respectively on "Fish and Fishery Products", "Production of Milk and Milk Products" and "Technologies for recovery and treatment of water for reuse", and provide their inputs; and

**General comment:** Burundi thanks the EWG Chair and fellow co-chair for this work well done. Burundi agrees with the proposed draft Annex IV on Technologies for the recovery and treatment of water for reuse and appropriate to maintain it. Annex IV gives provisions for options for technologies for the recovery and treatment of water for reuse.

- ii. **specifically provide input on the following:**
  - a) **whether you agree with the proposed new Annex IV and consider it appropriate to maintain it.**  
**Comment:** Burundi supports the proposed new Annex IV and consider it appropriate to maintain it.
  - b) **if the proposed Annex IV is maintained:**
    - **whether you consider a restricted revision of the General Section appropriate with the purpose to introduce a cross-reference to this new Annex IV; and**

**Comment:** Burundi supports to consider a restricted revision of the General Section appropriate with the purpose to introduce a cross-reference to this new Annex IV

- **whether you consider a restricted revision of the Annex I on Fresh Produce appropriate with the purpose to introduce a cross-reference to this new Annex IV and indicate which technologies are most relevant for Annex I.**

**Comment:** Burundi supports to consider a restricted revision of the Annex I on Fresh produce appropriate with the purpose to introduce a cross-reference to this new Annex IV and indicate which technologies are most relevant for Annex I

### Para 18, page 3

**General comment:** Burundi proposes that these Annexes are advanced in the Codex step process with the inclusion of the comments submitted.

## Appendix I

### Annex II: Fish and Fishery Products

#### Section 4 (definition), para 10 and 11

**Editorial comment:** Burundi proposes replacement of 'See' with 'Refer' in para10 and 11 in definitions.

#### Para 16

**Editorial Comment:** Burundi proposes in the **last bullet**, replace "don't " with "**shouldn't**" in the last sentence

#### Para 16, bullet two

**Technical Comment:** Burundi seeks clarification on this bullet

"Seawater known to have with high salinity and free from particulate material will increase seawater quality prior to treatment, since the level of presence of naturally occurring marine microorganism are associated with temperature and salinity as well as sediments"

#### Para 18

**Technical comment:** Burundi seeks clarification for the use of **term non-potable water** in codex text as used in this para. Burundi further proposes thatthe definition for non-potable water is defined if it's to be used

#### Para 26

**Technical Comment:** Burundi proposes that the existing statement be modified and include other quality tests such as chemical contaminants

**Rationale:** Chemical contamination is likely to be a source of contamination given that treated water is derived from wastewater and hydroponics

### Annex III: Production of Milk and Milk products

#### Para 19

**Editorial Comment:** Burundi proposes an editorial amendment in the second sentence, add "s" to "it" between after and first to qualify it into "its"

#### Para 29

**Editorial comment:** Burundi proposes rewording as given for purposes of consistency by deleting "of" and

replacing it with a comma

RO water recovered from permeates **of**, for example whey or water mixtures resulting from equipment and pipeline flushes typically has very low microbial counts. When the performance efficiency of RO has been subjected to a hazard analysis and validated, and is verified to be consistent, RO water may be used for the following purposes within approximately 24 hours after generation without additional microbiocidal treatment for example:

**Para 40, bullet 2**

**Technical comment:** Burundi proposes to add “should” in the statement.

All tanks, piping for the storage, treatments, and distribution system for (reuse) water in the plants and facilities, should be designed for CIP and **should** be able to withstand heat or cold exposure as needed, as well as extreme pH values.

**Rationale:** Burundi agrees with this proposal for clarity

**Para 66, third line**

**Editorial comment:** Burundi proposes the replacement of providing with **provided** for clarity and flow

**Para 69, Figure 4 (Scheme shows the recirculation of water used for cooling cheeses)**

**Editorial comment:** Burundi seeks clarification for an **unexplained question mark** and footnote which is not clear.

**Annex IV: Technologies for recovery and treatment of water for reuse**

**Para 6**

**Editorial comment:** Burundi proposes amendment as demonstrated below and seeks clarity why there only exists a closing square bracket yet the opening is missing. To read

RO is a membrane filtration technology, widely used in dairy manufacturing plants, in which water is forced under high pressure (e.g.31-60 bar) through a small (~~e.g. 1.0 to 0.1 nm~~) pore-size membrane (**e.g. 1.0 to 0.1 nm**) from the retentate side to the permeate side. The main purpose of RO is to remove nutrients and chemicals from water, but secondarily it also reduces levels of bacteria and viruses.}]

**Rationale:** For clarity and flow

**Para 12, bullet one**

**Editorial comment:** Burundi proposes the interchange of “if even” to “even if” in the statement to read: transmission of UV light, i.e. the level of turbidity in the water; ~~if even~~ **even if** slight turbidity/cloudiness in the water, the use of UV light may be ineffective as a microbiocidal treatment;

**Para 15**

**Editorial Comment 1:** Burundi proposes an editorial amendment on the para, **third bullet**, to delete “be” between may and buildup to correct the editorial error.

To read: resistance among microorganisms to disinfectants may ~~be~~ build up; this can be counteracted by change of disinfectants after a certain period of use;

**Para 15, last bullet**

**Editorial Comment 2:** Burundi proposes the opening of brackets for clarity by deleting the curl brackets

**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 (CX/FH 24/54/8)**

**General comment:** Burundi appreciates the work done by the Electronic Working Group chaired by Japan and co-chaired by Chile and recommends the document to be advanced in the Codex Step Process. Burundi proposes the editorial amendments of the document as captured in various specific Sections.

## Appendix I

### Para 12

**Editorial comment:** Burundi supports the adoption of the amendments made in Para 12 but also proposes that rather than deleting “thoroughly” in the sentence it should be replaced with “fully”

**Rationale:** To define the extent of the treatment

### Section 5.6: Management and Supervision

**Editorial comment:** Burundi proposes the deletion of section 5.6 on management and supervision since the subsection beneath it, has been deleted

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

**General comment:** Burundi recommends the document to be advanced in the Codex Step process

**Para 8, concerning the EWG report and requests on the following issues.**

- **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”**

**Technical comment:** Burundi proposes to adopt the first option of “Guidelines for food hygiene control measures in traditional markets for food”

**Rationale:** This preference is based on the understanding of the multifaceted nature of hygiene, which encompasses personal, environmental, domestic, and food hygiene. Among these, food hygiene stands out as the most critical within the context of traditional markets, defined All conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain

- **Whether the structure and headings capture all the key issues to be addressed;**

**Comment:** Burundi notes that the structure and headings capture and address all the key issues.

- **Whether there are any other issues to be covered by the guidelines; and**

#### Para 5.3.4

**Editorial comment:** Burundi proposes that the word “simple” is replaced with “friendly” in the statement for clarity, as it is easily understood

#### Para 7.4.11

**Technical comment:** Burundi proposes that the word “should” where it appears in this clause be replaced by a “shall”

**Rationale:** Food handlers must avoid touching money since its one of the drivers of food contamination

- **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., CXG22R-1997, CXC43R-1995, CXC71R-2013, CXC76R-2017), whether these guidelines might be considered as complementary to or replacement for those existing texts.**

**Technical comment:** Burundi proposes that the guidelines be used in conjunction with the other 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)

**Para 10, page 2**

Burundi supports for the guideline be progressed to the next Codex steps.

**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)**

**General comment 1:** Burundi notes that the discussion paper is in good faith and it gives guidance on the alignment of codex texts, and uniformity of structure, and facilitates cross-referencing where necessary.

**General comment 2:** Burundi takes note of the three options: option 1 is simple and offers drafters room to tailor the subheadings to the specific area of focus, however, this flexibility may pose a challenge in text alignment; Option 2 gives clear elaboration of the texts structurally, similar to Option 3; and, Option 3, in addition also offers both technical and structural alignment. However, some of the guidelines may have unique structures and can be exempted from the three options. Therefore, Burundi proposes the implementation of **Option 3** for alignment of all current and future CCFH texts where applicable.

**Q1**

**Technical comment:** Burundi proposes the adoption of option A

**Rationale:** A simple cross reference to the General Principles of Food Hygiene (CXC 1-1969) is included to maintain alignment of headings.

**Q2**

**Technical comment:** Burundi proposes to consider a simple cross reference to Section 7 of CXC 1-1969

**Q3**

**Technical comment:** Burundi notes that a simple cross-reference is sufficient

**Rationale:** Elaboration in this section is adequate

**Q4**

**Technical comment:** Burundi proposes the adoption of a simple reference to CXC 1 1969

**Rationale:** The text in CXC 1 1969 is adequate to take care of other illnesses that could be as a result of other biological hazards.

**Q5**

**Technical comment:** Burundi proposes the adoption of the alignment work to list out Burundih sub-heading in such sections and provide a specific cross-reference to CXC 1-1969 in Burundih case rather than the single cross-reference to the main section is sufficient

**Rationale:** It gives a better guide to the user

**Q6**

**Technical comment:** Burundi proposes that it is necessary to ensure alignment with the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023) which was adopted at the 46<sup>th</sup> session of the Codex Alimentarius Commission



**Q7**

**Technical comment:** Burundi proposes the adoption of option 2

**Rationale:** It provides better guidance and would be more user friendly

**Q8**

**Technical comment:** Burundi proposes that 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

**Rationale:** To align the text and avoid repetitions.

**Q9**

**Technical comment:** Burundi proposes the adoption of option 2

**Rationale:** Since there is an already existing EWG, it will make the alignment of text easier.

**Q10**

**Technical comment:** Burundi proposes the approach of prioritizing text to be based on age and current/emerging issues of importance.

**Rationale:** This is a systematic approach that takes into account emerging and pressing issues.

**Agenda Item 10: Revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012) (CX/FH 24/54/11)**

**General comment:** Burundi appreciates Canada and the Netherlands for the preparation of this project document. They have considered the requests of CCFH53 as well as the output of the JEMRA meeting and other available information and recommend this new work on the revision of the guidelines (***Revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012)***) for approval by CAC47.

**Agenda Item 11: Discussion Paper on the Revision of Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011) (CX/FH 24/54/12)**

**General comment:** Burundi appreciates the USA, Honduras, Brazil, and New Zealand for the preparation of this project document. In light of the latest scientific information as well as the recommendations from the JEMRA meetings, Burundi supports the project document to undertake new work to revise and update the appropriate text in CXG 78-2011. Burundi notes that the new work will consider factors relevant to the control of Campylobacter and Salmonella in chicken meat among others whose importance cannot be understated.

**Agenda Item 12: Discussion Paper on the Revision of Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007) (CX/FH 24/54/13)**

**General comment:** Burundi appreciates Canada, France, and the United States of America for the preparation of this discussion paper on the revision of '***Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007)***'. Burundi therefore recommends that this new work on the revision of the guidelines be considered by CCFH54. Burundi further notes that the revision of this standard as proposed in this project document will address new notable outbreaks, advances in technology, and varying practices among others.

**Agenda Item 13: Other Business and Future Work - New Work / Forward Workplan (Proposals in Reply to CL 2023/30-FH)**

**General comment:** Burundi appreciates the United States of America for the preparation of this discussion paper on New work/Forward workplan (Proposals in reply to CL 2023/30-FH). Burundi notes the guidance given in this project document as well as the new work items that are currently underway. Burundi appreciates

that the forward workplan is inline with the ***Process by which the Codex Committee on Food Hygiene (CCFH) will undertake its work.*** Burundi supports the New work/Forward workplan as envisioned in the project document.