



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

Comments of the Russian Federation

The Russian Federation requests to take into account the position presented in this document on some issues of the agenda of the 54th session of the Codex Committee on Food Hygiene:

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

The Russian Federation proposes:

- in section 5.4 "Cold storage" to maintain the requirement for limiting the temperature to $<7^{\circ}$ C while processing and storage with regard to the risks of fresh leafy vegetables contamination with other acute intestinal infections pathogens and their population growth; in this section as well as sections 4.2 "Cooling fresh leafy vegetables", 5.1 "Time and temperature control" and section 11 "Retail and foodservice" to give examples of fresh leafy vegetables, that lose their quality at $<7^{\circ}$ C.
- in section 3.2.1 "Water for primary production" to give examples of indicator microorganisms for water testing as well as to specify circumstances, when irrigation water testing is necessary.
- in section 4.3 "Washing fresh leafy vegetables" to specify the term "biocides" with the phrase "(technological aids with antimicrobial action)".

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: Proposed draft Annex IV on Sprouts

In section 5.8 "Cold sprout storage" the Russian Federation deems at maintaining the temperature for sprout storage at $<7^{\circ}$ C, as a parameter associated with the reduced risk of the increase in the STEC population, as well as for harmonization with Annex II on fresh leafy vegetables of the Control Guide STEC.

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)

The Russian Federation support the maintenance of Annex IV on technologies for recovery and treatment of water for reuse.

We believe that the limited revision of Annex I on fresh products in order to provide a cross-reference to the new Annex IV and indicating the technologies most relevant to Annex I is the preferred option.

Regarding Annex III on dairy products, the Russian Federation would like to take into account the following comments:

- in the section on water for reuse, in paragraph 26 believe that it is necessary to strengthen the language referring to national legislation in this area and write out as follows: "First of all, the laws and regulations established by the competent authorities concerning water reuse have to be taken into consideration";
- in paragraph 27 we consider it appropriate to emphasize the obligation to conduct an independent technical examination (expertise) and indicate the following: " Designing water reuse systems at dairy enterprises is required to have an independent technical expertise";
- in paragraph 41, concerning the water distribution system (pipelines), of the section "Safety Management of Water," we propose applying color marking to indicate the type of water for the entire length of water pipelines.

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)

The Russian Federation stresses the importance of including an a reference to potentially pathogenic vibrio in the draft revision of the Guidelines.

In paragraph 25 of Section II "Scope", we consider it important to indicate, instead of 3, at least 12 species of vibrios, both pathogenic and opportunistic.

In paragraph 30 of section III "Primary production" in connection with the expansion of the range of possible food products - factors of disease transmission in the last sentence also to add the phrase "and opportunistic": "For the management of pathogenic vibrio in seafood, it should be taken into consideration the temperature, time and salinity of the water. As applicable, specific temperature or salinity levels to use as control measures should be determined on the basis of epidemiologic and exposure studies and monitoring of pathogenic and opportunistic vibrio levels prior harvest season."

In paragraph 34 of Section III "PRIMARY PRODUCTION" we propose to indicate the requirements for the time interval between fishing and cooling. Replace the phrase "The delay between catching and cooling should be as short as possible" with: "*Catches of aquatic biological resources shall be cooled with ice or chilled water not later than 1 hour after the catch is removed*".

We also suggest adding a paragraph with additional instructions if it is not possible to comply with the temperature requirements: «*If the vessel design does not allow the catch of aquatic biological resources to be cooled with ice or chilled water not later than 1 hour after hauling (catching), it is allowed to land the catch of aquatic biological resources without ice (under appropriate temperature conditions). Such products should be landed not later than 12 hours from the moment of extraction (catch) with maintenance of their temperature from minus 1°C to 4°C. If aquatic biological resources are cooled with water, they should be stored in clean cooled water for no more than 3 days on board the vessel*».

- In paragraph 38, relating to on land transportation from the port of discharge to the coastal market and/or processing plants, the Russian Federation proposes to indicate specify the mandatory range of allowable

temperatures under which such transportation should take place and propose the following wording: "*Live fish and shellfish should be transported at a temperature between minus 1°C and plus 4°C*";

- In paragraph 69 of section 5.2.2.1 "Washing and handling" it is reasonable to supplement the first sentence with the parameters of the temperature of potable cold running water, as follows: " For the washing and handling of seafood, clean water of a temperature not exceeding 15°C has to be used";

In paragraph 72 of section 5.2.2.3 "Approaches to food processing", the Russian Federation supports the use of the term "minimization of vibrio growth" instead of "reducing the level", based on the hygienic principle of avoidance of contamination instead of decontamination.

Agenda Item 9:

Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (CXC 1-1969)

The Russian Federation confirms its position on the approaches and principles of harmonizing of Codex Commission texts developed by the Committee with the revised version of the General Principles of Food Hygiene (CXC 1-1969), as stated in the response to Circular Letter CL 2024/12/FH.

In particular, Russia supports Option 2, which involves full structural harmonization of the Commission texts with the revised version of the General Principles of Food Hygiene.

Agenda Item 11:

Discussion paper on the Revision of Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011)

The Russian Federation supports the work to revise and update the Guidelines for the control of Campylobacter and Salmonella in chicken meat (CXG 78-2011), reflected in the relevant discussion document.

At the same time, in the "Relevance and Timeliness" section, Russia offers the following addition: "*Consider such measures as refrigeration or freezing of carcasses to reduce Campylobacter counts in broiler chickens and to prevent Campylobacter growth during the storage process*", due to the fact that freezing by itself does not affect the frequency of contamination.

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)

The Russian Federation supports the work to revise and update the Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007)