

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
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ORGANIZATION



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Agenda Item 5

CX/FH 00/5 - Add.1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Thirty-third Session

Washington DC, U.S.A., 23 –28 October 2000

PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR PRE-CUT FRUITS AND VEGETABLES (AT STEP 3)

In response to CX/FH 00/5, the following Governments submitted comments: Canada, Brazil, Denmark, Iran (Islamic Republic of), Mexico and the United States of America.

General Comments

Canada

At the 32nd session of the CCFH, the Committee discussed the appropriateness of consolidating the Proposed Draft Code of Hygienic Practice for the Primary Production, and Packing of Fresh Fruits and Vegetables with the Proposed Draft Code of Hygienic Practice for Pre-cut Fruits and Vegetables as the two Codes overlap in many areas. During a meeting with the two drafting groups in April 2000 the many links between the two codes were highlighted and the common issues streamlined where possible. The drafting groups proposed to incorporate this Code into the Proposed Draft Code of Hygienic Practice for the Primary Production and Packing of Fresh Fruits and Vegetables (agenda item 4) in the form of an annex as the differences arise only after primary production. Canada favours the two documents to be considered separately at this time, however, would support consideration of eventual combination of the two Codes.

Brazil

Brazil considers that this is a very important document, and would like to submit for consideration the inclusion of a selection step, when necessary, to be inserted in the text before 5.2.2.3 and the importance of emphasize that process water should comply with Good Hygienic Practices.

Denmark

In the document the use of disinfectants in water for food contact is mentioned in para. 5.2.2.3. Here, chlorine

is often used as an example of a disinfectant. The disinfectant is used in order to obtain an effect on the micro-flora on the surface of the foodstuff.

In the written comments from Denmark to the circular letter from last year and during the meeting last year, we commented, that Denmark finds that the intentions of the use of chemicals like for example chlorine in the water for rinsing vegetables are to obtain an effect on the food itself, and therefor the use is not as disinfectants but as a function falling under the definition of food additives. However, at the last meeting some of the other delegations did not agree in this interpretation. In order to ensure that food safety relating to residues of chemical compounds also are dealt with, we propose that CCFH through CCFAC ask for a toxicological evaluation of the use of chlorine in direct contact with foodstuffs by JECFA as a first step. Furthermore we propose, that CCFH asks the CCFAC for advise on the interpretation on whether such use of chemical substance are covered by the definition on food additives or not.

Chlorine is often discussed in this context. It is well known from chlorination of drinking water that several reaction products are formed during the chlorination. In theory, the number of various reaction products and possibly also the concentrations could be higher in water containing for instance soil and juices from the foodstuffs. Furthermore, it is known that many of these reaction products can be of concern for the consumer safety. This is the background for Denmark being concerned about the use of chlorination of water, and especially of recycled or reused water.

Mexico

In general, Mexico is in agreement with the document. We also stress our position that the document should be an Appendix to the Code of Hygienic Practices for the Primary Production, Harvest and Packing of Fresh Fruits and Vegetables; if this is done, the 2nd, 3rd and 4th bullets should be removed from point 5.2.2.3.

In addition, we suggest carefully reviewing the translation into Spanish. Towards this end, we suggest that:

In the table of contents the term “precorte” // “pre-cut”// be changed to “precortado” //”pre-cut”//.

In point 5.2.2.3 the term “descontaminación” //”decontamination”// be changed to “desinfección” //”disinfection”//.

In the first bullet in point 5.2.2.7 the term “temperaturas bajas” //”low temperatures”// be changed to “refrigeración” //”refrigeration”//, since the title of the point is “Almacenamiento en refrigeración” //”Refrigerated Storage”//.

For the title of point 5.6 change the word “Gestión” //”Management”// to “Dirección” //”Direction”//, since in the general principles document the point is called “Dirección y Supervisión” //”Direction and Supervision”//.

In point 5.8 modify the name of the title to the following: “Procedimientos de Retiro de Productos” //”Procedures for Product Recall”//.

In the paragraphs or texts where the phrase “saneamiento” //”sanitizing”// is used, change the wording to “limpieza y desinfección” //”cleaning and disinfection”//.

United States of America

The United States expresses its appreciation to France and its drafting partners for their work in undertaking the revision to this Code. The Code is significantly improved. The United States recommends the advancement of this Code to Step 5 of the Codex Step procedure.

The correct title should be: "*Proposed Draft Code of Hygienic Practice for Ready-to-Eat Raw Pre-Cut Fruits and Vegetables*".

The United States believes that there should be a continued discussion on merging this Code with the *Proposed Draft Code of Hygienic Practice for the Primary Production and Packing of Fresh Fruits and Vegetables*. The United States would support such a merging of the two Codes with the suggestion that the technical information contained in this Code on Ready-to-Eat Raw Pre-Cut Fruits and Vegetables could be handled as an Annex to the Primary Production Code (with an appropriate change in the title of the Primary Production Code).

2.1 SCOPE**Iran**

In the third paragraph of the section 2.1, the first sentence is not completely clear. In addition it is not clarified as to whether the further processing would be done by the processor or consumers, where as it's efficiency depends on the applied method. So some pathogens may be finally present.

2.3 DEFINITIONS**Iran**

In order to remove any obscurity, we propose defining the terms "Trimming", "primary production (including harvesting)" and "post-harvest water" in the section 2.3.

3. PRIMARY PRODUCTION**Iran**

It is inappropriate to refer in section 3 to "code of Hygienic Practice for Primary Production and Packing of Fresh Fruits and Vegetables" in general. Because according to section 1: "This present draft code deals with GMP for all stages involved in the ..., from receipt of raw materials to distribution of finished products", moreover in many cases processors receive raw materials from long distance supplier and have no information about primary production, Therefore, this section is practically inapplicable. This section requires more explanations and emphasizes the packing and transporting conditions of raw materials.

5.1 CONTROL OF FOOD HAZARDS**United States Of America**

In the last line of the first paragraph, the title of the draft code for Primary Production should be corrected to state "Primary Production and Packing".

5.2.2 Specific Process Steps

Iran

In section 5.2.2.2 only removing the foreign materials is mentioned. Sorting damaged or affected raw fruits or vegetables by microorganisms (including fungi) should be added. In addition to trim and core fruits, in many cases, to peel and/ or remove extra parts of fruits and vegetables is necessary . So it would be beneficial to consider this matter in this section or another appropriate section.

5.2.2.3 Washing and decontamination

Denmark

2nd bullet: Denmark questions the use of disinfectants, see introductory general remarks.

5th bullet: Not only should the use of the water not constitute a risk to the safety, but also it should not bring about unacceptable change in the composition of the foodstuffs or deterioration in the organoleptic characteristics thereof.

United States of America

In the second bullet, delete the brackets that are at the end of that paragraph and insert the term "Codex Committee on Pesticide Residues".

5.2.2.4 Pre-cooling Fresh Fruits and Vegetables

United States of America

First dash point. To ensure the continuation of hygienic water quality, modify the end of this dash point to read as follows: "...be maintained and kept clean."

5.2.2.6 Washing after cutting, slicing, shredding, and similar pre-cut processes

United States of America

Delete the words "When possible" at the beginning of the first sentence. The words are unnecessary. Additionally, it is recommended that a bullet be added on the use of sanitizer in wash water. The second bullet from Section 5.2.2.1 of the Primary Production Code could be used here. Thus a new bullet to this section could read: "Where appropriate, effective disinfectants could be used to minimize cross-contamination during post-harvest use. The disinfectant levels should be monitored and controlled to ensure that they are maintained at effective concentrations. Application of disinfectants, followed by a wash as necessary, should be done to ensure that chemical residues do not exceed levels as recommended by the Codex Committee on Food Additives and Contaminants."

5.7 DOCUMENTATION AND RECORDS

United States of America

The second to the last line of the first paragraph should read "This period will likely be much longer than the shelf life of the product."