

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fortieth Session

The Marriot Hotel, Guatemala City, Guatemala

PROPOSED DRAFT ANNEX ON FRESH LEAFY VEGETABLES INCLUDING LEAFY HERBS TO THE CODE OF HYGIENIC PRACTICE FOR FRESH FRUITS AND VEGETABLES

Comments submitted by; Argentina and Australia

ARGENTINA

Argentina has recommended several editorial changes to the Spanish version of the document.

AUSTRALIA

Some Key Points are:

Lack of consistency in terminology used in the draft annex where the term of **fresh leafy vegetables** is apparently used interchangeably with 'leafy green vegetables'.

One of the common features contributing to the large scale of outbreaks of fresh leafy green vegetables is the extent of product distribution. It is suggested that the Working Group examines the implication of distribution on the extent of the outbreak, and develop appropriate guidelines on the control of product distribution.

Consistency in expression: 'post harvest', 'post-harvest' and 'postharvest' have been used in the document. For consistency purposes, it is suggested to use only one form of expression. Scientific style guides recommend 'postharvest'.

INTRODUCTION

AUSTRALIA

Last paragraph, Please consider including not only pathogens reported in “international outbreak data” but also others of importance in broader **communities e.g. parasites** *Giardi lamblia*, *Fasciola hepatica* and viruses Rotavirus and Calicivirus into the list of microbial pathogens.

1. OBJECTIVE OF THE ANNEX

ARGENTINA

First sentence, after “...leafy vegetables..” add the phrase “including leafy herbs” and delete “processing”

Rationale: The objective of the standard should be explicit and not give rise to doubts on the commodities considered. Also, this annex does not refer to any kind of processing of the commodity.

AUSTRALIA

It is recommended that the objective of the annex be modified to include ‘avoidance and minimisation of microbiological hazards’. This is because ‘avoidance and minimisation of microbiological hazards’ is feasible in certain situations where **fresh leafy green vegetables** and fresh leafy herbs are produced, packed, processed, distributed and marketed.

2. SCOPE, USE AND DEFINITIONS

2.1 SCOPE

First Paragraph

ARGENTINA

We propose to delete the word “processing”

Second Paragraph

ARGENTINA

At the end of the paragraph, after “parsley” add “peppermint, oregano, rosemary and fennel”

Rationale: The above herbs are in the list of species considered in this Annex.

AUSTRALIA

Second sentence, modify it to begin with ‘Examples include lettuce, baby spinach, cabbage, chicory, endive and radicchio...’

DEFINITIONS**Hydroponic:****ARGENTINA**

We propose the changes below in order to improve the wording and facilitate understanding.

The wording should be as follows:

“Hydroponic: a general method for the production of plants in a water ~~or plant~~ medium, ~~such as coconut husk fiber~~ without soil; plants are grown using mineral nutrient solutions instead of soil. Plants may be grown with their roots in the mineral nutrient solution only, or in inert media such as perlite, gravel ~~or~~ mineral wool or coconut husk fiber”.

3. PRIMARY PRODUCTION OF FRESH LEAFY VEGETABLES INCLUDING FRESH HERBS**3.1 ENVIRONMENTAL HYGIENE****FIRST BULLET****ARGENTINA**

First paragraph, after “*Location of the Production/*” add “Cultivation”

Last paragraph, end of the paragraph, delete “constructed” and substitute “artificial”

Rationale: Improve the wording and facilitate understanding.

3.2.1.1.3 Hydroponic water**SECOND PARAGRAPH****ARGENTINA**

End of the paragraph delete “microbial.”

3.2.1.2 Manure, biosolids and natural fertilizers**FIRST PARAGRAPH****ARGENTINA**

Second sentence, after “Particularly in” add “**inadequately composted**” and also after “aged manure” delete “**inadequately composted.**”

3.2.3.1 Personnel hygiene and sanitary facilities**Last Two Bullets****AUSTRALIA**

Please consider including the expression of ‘or the equivalent’ after the word of ‘paper towels’ and ‘toilet paper.’ This would facilitate undeveloped economies to take up the recommended personal hygiene practice.

3.2.3.2 Health status**THIRD BULLET****ARGENTINA**

Modify the text to read as follows; “Any employee showing symptoms of ~~or that is likely to have a diarrheal or food transmissible~~ communicable disease should not be handling fresh leafy vegetables or leafy herbs. ~~and should either be moved to another job where they do not handle any fresh produce or packing containers OR they~~ They should be sent home until they are well. In the event of potentially communicable chronic diseases, the worker should be moved to tasks where they are not in contact with commodities and follow prevention standards”.

4.4.2 Drainage and waste disposal**SECOND BULLET****AUTRALIA**

The statement “Floor should be kept dry using appropriate equipment’, is not practical for a packing establishment.

LAST BULLET**AUTRALIA**

Please consider adding ‘This should not be carried out while the food production is in operation because the cleaning process may lead to the spread of the microorganisms of concern onto the fresh leafy vegetables.’

The second dot point under section 4.4.2, ‘

5.2.2.3 Cooling of fresh fruits and vegetables**ARGENTINA**

Argentina would like to eliminate the word “fruits” from the title

5.2.2.5 Cutting, slicing, shredding, and similar pre-cut processes

ARGENTINA

We propose to eliminate **5.2.2.5 Cutting, slicing, shredding, and similar pre-cut processes, 5.2.2.6 Washing after cutting, slicing, shredding, and other similar pre-cut processes, 5.2.3 Microbiological and other specifications, 5.2.4 Microbial cross-contamination physical and chemical contamination,** because they don't correspond to this Annex

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

5.2.3 Microbiological and other specifications

5.2.4 Microbial cross-contamination

5.2.5 Physical and chemical contamination

5.7 DOCUMENTATION AND RECORDS

ARGENTINA

We propose to eliminate the last paragraph, as it does not correspond to this Annex.

9. PRODUCT INFORMATION AND CONSUMER AWARENESS

ARGENTINA

We propose to eliminate the last bullet and the last paragraph because they don't correspond to this Annex.