



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Forty-fourth Session

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DRAFT REGIONAL CODE OF PRACTICE FOR STREET-VENDED FOODS (NEAR EAST)

(comments and proposals)

AUSTRALIA

Specific Comments

2.3.8 Perishables and 2.3.10 Readily Perishable Food

These definitions could be simplified to perishable food being any food that needs to be kept refrigerated to minimise growth of food poisoning organisms and/or food spoilage (if food spoilage needs to be covered). Examples of perishable food could then be listed.

Section 4 – Vendors

4.1 Health condition of the vendors

4.1.1 No vendor, helper ~~assistant~~ or food handler shall be allowed to perform his/her job if suffering from any of the following diseases and symptoms: jaundice, diarrhoea, vomiting, fever, sore throat with fever, discharge from ear, eye and nose, visibly infected skin lesions (boils, cuts, etc.) In such cases, he/she shall cease from handling food in any capacity and seek medical treatment.

Rationale: For consistency.

4.2 Personal hygiene and behaviour

4.2.2 Wear clean clothing. ~~Dress in clean and proper attire.~~

Rationale: 4.2.2 Query ‘proper’ attire - too ambiguous. Suggest ‘Wear clean clothing’.

4.2.3 Wash hands thoroughly with soap and running clean water before and after handling food, after visiting the toilet, after handling unsanitary articles, touching animals, touching raw food, after handling toxic and dangerous materials as and when necessary.

Rationale: Recommend hands are washed in ‘*running* clean water’ and thoroughly dried on single use towels. If running clean water is not available, an acceptable alternative hand washing method should be agreed to by the relevant authority.

4.3 Training of vendors

4.3.1 The vendor shall ensure that him/herself and all food handlers and helpers have completed basic food hygiene training by the relevant authority or other institution recognised or approved by the relevant authority. ~~Every vendor, helper or food handler shall undergo a basic food hygiene training prior to licensing and further training as required by the relevant authority. Training is to be conducted by the relevant authority or other institutions recognized or approved by the relevant authorities.~~ Vendors should also be made aware of their responsibility to consumers and be informed of available credit facilities and other sources of finance to assist and improve their businesses.

Rationale: It may be more realistic to only require the vendor to complete the training and then require the vendor to provide on the job training in food safety to food handlers and helpers.

Australia queries the appropriateness of including a sentence on finance available to the business.

4.4 Vendor associations

'Vendors are encouraged to be members of their local street food vendor association' ~~The formation of street food vendor associations or cooperatives should be encouraged to provide a liaison point with the relevant authorities in view of facilitating the implementation of control measures.~~

Rationale: Australia suggests this is more appropriate and that the following text be included in relevant authority section 'Encourage the formation and participation in, street food vendor associations or cooperatives'.

Section 5 – Design and Structure

5.3.2 Waste water disposal

Vendors' stalls should have an efficient waste water disposal system which should be maintained in a good state of repair **and working order**. The system should be large enough to carry peak loads and be provided with traps to ensure only liquid waste is discharged into the drain/sewer.

Rationale: Vendors' stalls should have an efficient waste water disposal system which should be maintained in a good state of repair *and working order*.

5.3.5 Toilets

Every vendor, helper or food handler should have **easy** access to **adequate** facilities **which are approved by the relevant authorities and kept in a clean and operational condition at all times**.

Rationale: Reword to 'Every vendor, helper or food handler should have *easy* access to *adequate* toilet facilities which are kept in a clean and operational condition at all times'. Australia queries why the facilities would need to be approved by the relevant authority.

Section 6 – Appliances

6.2 (b) Reword to 'immediately after being used to prepare raw food' i.e.

(b) ~~especially after having put unclean material or food on it if the surface is subsequently to be used to cut street foods or foods to be consumed raw.~~ **'immediately after being used to prepare raw food'**

6.7 All appliances are to be maintained in good state of repair and working order

Rationale: Australia suggests these changes for clarity.

Section 7 – Food Preparation

7.1.1 Supply of ingredients, including ice, must be from known and **reputable** ~~reliable~~ sources.

Rationale: Australia suggests these changes for clarity.

7.1.2 ~~Delete. 7.1.2 The food handling method employed should be such as to minimize the loss of nutrients.~~

Rationale: Australia queries if the scope of this CoP should extend to the nutritional quality of the food and query its appropriateness in this section.

7.3 Serving food

7.39 Reword to '...and should be displayed in a manner *to protect the food from contamination*'.

7.3.9 Cut fruit or other foods ordinarily consumed in the state in which they are sold may be set out in an enclosed display case, cabinet or similar type of protective device and should be displayed in a manner *to protect the food from contamination* ~~which will not affect the wholesomeness and cleanliness of such foods.~~

Rationale: Australia suggests rewording to focus on the safety issue being managed.

7.3.11 Australia queries the temperatures listed. Normally 60°C for hot, 5°C for cold and frozen food need only be maintained frozen – a frozen temperature not critical for food safety only quality.

7.5 Transportation of street foods

7.5.3 Australia queries why milk has been singled out. Any potentially hazardous food should be transported under temperature control, unless food is only being transported short distances.

7.6.2 Australia queries the inconsistency between storage of perishable food at a temperature up to 10°C but continuous serving at 5°C and below. You would expect storage times to be longer than serving times.

BRAZIL

Brazil congratulates the FAO/WHO Codex Coordinating Committee for the Near East and presents some amendments to the Proposed Draft.

The hygiene provisions, particularly on Sections 3.2 to 3.5 should be reviewed to clearly state the objective to be achieved. Additionally, it is proposed to clarify the use of the term “sanitizing” in cleaning procedures as the term used in Food Hygiene Texts is “disinfection” (the reduction, by means of chemical agents and/or physical methods, of the number of microorganisms in the environment, to a level that does not compromise food safety or suitability), which is defined at Code of Practice – General Principles of Food Hygiene (CAC/RCP 1-1969).

Specific Comments

Introduction

Consider to delete chemical/bacterial in the second paragraph to harmonize with the adopted definition of Contaminant of the Code of Practice – General Principles of Food Hygiene (CAC/RCP 1-1969).

Due to the potential ~~chemical and bacterial~~ contamination out on the streets, the present guidelines recommend raising the awareness of the people working in the ready-to-eat foods sector and improving the environmental conditions in which those foods are vended. They also recommend providing the necessary services to help the vendors guarantee the safety of such foods.

2.3.2 Clean Water

Consider to replace the definition of Clean Water in this paragraph to the adopted in Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003).

~~Water from any natural source where there is no reason to believe the water is contaminated.~~ **Water that does not compromise food safety in the circumstances of its use.**

2.3.3 Crockery

Consider to review this paragraph to improve the reading.

All tools used for food serving and consumption (whether non-disposable or disposable), ~~and they include~~ **such as** cups (glasses), plates, trays, mugs, spoons, forks, ladles... etc.

2.3.17 Waste Water

Consider to replace the definition of Waste Water in this paragraph to the adopted in Regional Guidelines for the Design of Control Measures for Street-Vended Foods (Africa) (CAC/GL 22 – Rev.1, 1999).

~~Waste water resulting from the activity of street food vendors.~~ **Means sullage water arising as a result of the activity of vendors.**

5.1 Location

Consider to replace “vendor’s stall” to “street food stall” in paragraph 5.1.3 as the Section 2.3.16 of this Proposed Draft provide a definition to Street Food Stall that is the appropriated term to this paragraph.

5.1.3 The space in and around the ~~vendors' stall~~ street food stall shall be free of unnecessary stored goods or articles and discarded articles in order to permit easy access for cleaning.

5.3.4 Cleaning

Consider replacing in this paragraph the reference “5.6” to “6.5” that is the appropriated to the provision to this paragraph.

All working surfaces, table tops, floors and surrounding areas should be thoroughly cleaned at least daily, using one of the methods described in paragraph (~~5.6~~ **6.5**).

Section 6 – Appliances

Consider replacing in paragraph 6.6 the reference “5.6” to “6.5” that is the appropriated to the provision to this paragraph.

Disposable crockery shall be used only once and properly disposed of. In the case where nondisposable crockery is used, the crockery is to be cleaned after each use using the method described for utensils in paragraph ~~5.6~~ 6.5.

7.2 Cooking and Handling

Consider to delete in paragraph 7.2.4 the (b) point, as thawing in running potable water is not recommended considering that the scope is to street food vendor and the food could be exposed to abusive temperature as defrost is not homogenous and could promote microorganism growth.

Thawing: Frozen products, especially frozen vegetables, can be cooked without thawing. However, large pieces of meat or large poultry carcasses often need to be thawed before cooking. When thawing is carried out as an operation separated from cooking this should be performed only in:

- (a) a refrigerator or purpose-built thawing cabinet maintained at a temperature of 4°C; or
- ~~(b) running potable water maintained at a temperature not above 21°C for a period not exceeding 4 hours; or~~
- (c) a commercial microwave oven only when the food will be immediately transferred to conventional cooking units as part of a continuous cooking.