



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

### Comments of Institute of Food Technologists (IFT)

IFT thanks CCFH for the opportunity to comment on some of the agenda items upcoming at the 54<sup>th</sup> session of CCFH and appreciates member and observer consideration of these points.

#### **Agenda Item 6: Guidelines for the Safe Use and Reuse of Water in Food Production (Annex III on Dairy Products and Annex IV on New Technologies)**

IFT supports the proposal in Annex III as outlined in CL 2024/01/FH and the creation of the new Annex IV on New Technologies. IFT would encourage the committee to consider the use of the water reuse section of Annex III on Dairy Products in Annex IV by broadening of the section on water reuse in Annex IV to include other industries in food production. While the reuse of process water in the dairy industry has had a significant amount of technical development, there are many other food industry applications of this technology that can be applied for water re-use to enhance sustainable practices (e.g., fruit and fruit juice processing, vegetable processing, baked goods and snack food production, beverage processing in general such as plant-based drinks) and IFT recommends the committee consider expanding Annex IV to capture this significant opportunity to provide sustainable guidelines for members across the breadth of food production categories that use water. Additionally, the use of technologies such as Reverse Osmosis (RO) for this purpose can have the added benefit of removal of contaminants beyond the realm of micro-organisms.

#### **Agenda Item 9: Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene**

Regarding the options presented in CL 2024/12/FH, IFT believes that it is important for CCFH to continue to bring consistency between the older and newer texts relevant to CXC 1-1969 (General Principles of Food Hygiene). As new technology continues to develop, revisions continue to be necessary as additional relevant texts are created, hence, IFT supports the use of Option 3 on the full structural and technical alignment of new texts with CXC 1-1969. As a scientific organization, IFT further believes that CCFH should consider development of a standing EWG on incorporation of new, relevant technologies within the pertinent texts as scientific advances are occurring at a sufficient pace to warrant such updating on a regular basis (every 3-5 years seems appropriate to revisit scientific and technological advances across various topic areas). By creating such a structure, IFT believes Codex will be better situated to provide members and industry with more current texts to enhance protection of the food supply.

#### **Agenda Item 13: Other Business and Future Work**

Regarding the four new work proposals that were presented in response to CL 2023/30-FH, IFT supports work on all of them, but would particularly recommend that CCFH prioritize the proposal on revising the Guidelines on the Application of the General Principles of Food Hygiene to the Control of Viruses in Food (CXG-79-2012) and the alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (GPFH – CXC 1-1969). Similar to the point made by IFT regarding Agenda Item 9 above, IFT believes that these two proposals fit into the ongoing revision work that

could be moved from an ad hoc proposal basis to a scheduled review in light of the development of scientific understanding and new technologies occurring over relatively short timespans (5 years). By setting up a continuing and ongoing EWG to handle these revisions on a regular schedule, CCFH will be positioned well to manage keeping texts relatively current with the advances in science and technology. Other Codex committees have ongoing structures of a similar nature for various purposes, as do the various WHO/FAO Joint Expert bodies that meet on a regular schedule to address new topics (e.g., new food additives).