

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 8 and 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-First Session

Cleveland, Ohio, United States of America, 4 - 8 November 2019

Comments by Uganda

Uganda appreciates the opportunity to provide comments on the different agenda items to be discussed during the 51st Codex Committee on Food Hygiene. The items on the Agenda are critical for the overall food safety objectives.

Agenda item 5: Proposed draft code of practice on food allergen management for food business operators

Uganda supports the proposal to include the role of Competent Authority in identifying allergens that are important in their countries.

Rationale: The position is premised on the fact that there are several businesses which are operated on small scale and would rely on external parties especially the competent authorities to identify the allergens.

Furthermore, we note that the objective of developing the code of practice was to take care of food business operators however, there is need to improve on the objective to include the role of the competent authority.

Para 9/14/72/160: Uganda is in support and believes that there is a need for precautionary labelling of foods suspected to contain allergens.

Rationale: There are different levels of development for different countries. However, this should never be substituted by poor hygienic practices.

Uganda notes that it is important for FAO and WHO to fast track the work following the decision from the CCFH50 to establish the list foods associated with allergens.

Agenda Item 6: Proposed draft revision of the General Principles of Food Hygiene (CXC 1-1969) and its HACCP Annex at step 4

Uganda welcomes the appreciates the progress made thus far to revise the GPFH which has significant impact in terms of supporting growth of the entire food industry through applying recommended hygiene practices hence influencing the quality and safety of food.

Uganda supports the proposal to maintain the definition of the terms 'acceptable level', 'competent authority' and 'Food Business Operator' in para 9 under the summary of the discussion of the EWG.

Uganda also agrees with the proposal to provide a difference between HACCP and HACCP plan by adding the word "system" to HACCP.

Rationale: The addition improves the clarity of the text hence providing same meaning to the users of the standards.

Uganda agrees with the position to delete the phrase 'condition of' in the definition of Hazard in **para 10**.

Rationale: The term is not used during hazard analysis.

However, there was need for the definition to be reviewed even in the Codex procedural manual.

Uganda supports the proposal from the EWG in **para 4 of the introduction**.

Rationale: The new proposal supports the small FBOs and is based on the level of the risk of a given product. The paragraph should however be broken up to provide more clarity.

Uganda agrees with the position to retain the term ‘culture’ in the title so that the title reads “Management Commitment and Food Safety Culture” in **para 16 of the General principles**.

Rationale: Food safety culture is an important emerging concept in food safety management.

Uganda supports the proposal to define the term “Food Safety Culture” as the attitude, values, norms beliefs and behaviours that a particular group of people share about food safety.

Rationale: It is important to demonstrate that producing and consuming safe food is a vital commitment.

Uganda proposes modification of the definition of FBO to read “A person or persons responsible for operating a business/entity at any step in the food chain.

Rationale: The definition should take care of the possibility of more than one person being responsible for operating the food business.

Uganda also agrees with the position to include the phrase “All food handlers should periodically undergo medical screening as appropriate to prevent contamination of food”.

Insert a new Para 85 bis to read as follows “*Personnel working in food establishments should be medically examined prior to employment and periodically in line with the relevant national public health regulations*”.

Rationale: This is acceptable in the public health regulations and laws of many countries including Uganda. The final standards should reflect best practices in both the developed and the developing world and ensure are adequately well balanced.

Agenda Item 8: Proposed draft guidelines for control of Shiga toxin-producing *Escherishia coli* in beef, raw milk and cheese produced from raw milk, leafy vegetables and sprouts at step 4

Uganda agrees with the position to change the definition of raw milk to align it with the definition from the Codex general standard for Use of dairy terms. As “Milk is the normal mammary secretion of milking animals obtained from one or more milkings without either addition to it or extraction from it, intended for consumption as liquid milk or for further processing”

Rationale: It is important to align the definition with the already harmonised definition.

Agenda Item 9: Discussion paper on the principles for safe use of water in food processing

Uganda takes note of the interest to start new work on the development of a guidance document that will provide for safe use of water in food processing by CCFH. Uganda supports the recommendation use the term ‘guidelines’ rather than ‘principles’. Uganda further supports the Risk-based approaches and assessment of the fitness of the water for the intended use.

Rationale: Guidelines will provide direction to action or behaviour in the sourcing, safe use and reuse of water.

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