

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 2, 3, 6, 7, 8, 9, 10, 11, 12, 13

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

Comments of the African Union (AU)

Agenda Item 2: Matters referred by the Codex Alimentarius Commission and/or other Codex Subsidiary Bodies to the Committee (CX/FH 24/54/2)

Position: African Union appreciates the work of the other committees and supports postponing consideration of sampling plans for histamine until such time that CCMAS has completed its tools to support implementation of the General Guidelines on Sampling (CXG 50-2004).

Agenda Item 3: Matters arising from the Work of FAO and WHO (including JEMRA) (CX/FH 24/54/3)

Position: African Union supports the work of FAO/WHO in providing scientific advice for the development of CCFH documents. AU notes the information in the report and looks forward to using the scientific advice to make the relevant risk management decisions.

On the issue of the World Health Assembly Decision on Traditional Food Markets, Africa values the prioritization on reducing public health risks in traditional markets and appreciates the ongoing efforts to ensure the safety of products available in these markets. Traditional markets are crucial for providing food, nutrition, and supporting employment and income for many, with 70% of urban households in Africa relying on them. African Union recognizes and appreciates the FAO, WHO, and other partners in enhancing food safety awareness and practices. To maintain these markets as safe and reliable food sources, Africa advocates for continued investment in improving food safety standards. This involves upgrading market infrastructure, improving the supply chain, and providing education and training to vendors and consumers

Agenda Item 6: Guidelines for the Safe Use and Reuse of Water in Food Production (Annex II on Fishery Products at Step 4 and Annex III on Dairy Products at Step 4) (CX/FH 24/54/7)

Position: The African Union appreciates the effort of the EWG chaired by the European Union to develop this guideline and the annexes. AU notes the substantial work that have gone into Annex all the Annexes. AU has contributed comments at various stages of this work and feels confident that Annex III is ready for adoption. Additionally, AU supports the creation of the new Annex IV since the treatment technologies can cover the different product-specific annexes, however, Annex IV still needs to be reviewed given that some sections still refer specifically to milk and dairy products. AU also supports the adoption of Annex IV on Technologies for recovery and treatment of water for reuse

Agenda Item 7: Proposed draft revision on the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood (CXG 73-2010) at Step 4 (CX/FH 24/54/8)

Position: African Union appreciates the effort of the EWG chaired by Japan and co-chaired by Chile to develop a draft revision of this guideline. AU looks forward to further discussions during CCFH54 and progression of the guidelines in the Codex standard stepwise process.

Agenda Item 8: Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food at Step 4 (CX/FH 24/54/9)

African Union thanks the EWG chaired by Kenya and co-chaired by Bolivia and Nigeria for developing the proposed draft guidelines for food hygiene control measures in traditional markets for food. These Guideline will contribute significantly to African Union's objective of raising the overall food safety standards in Africa's traditional markets for food.

Introduction Item 8:

1) Whether the title should be retained as "guidelines for food hygiene control measures in traditional markets for food" or change to 'Guidelines for hygiene control measures in traditional markets for food'

Position: African Union supports the original title "Guidelines for food hygiene control measures in traditional markets for food"

Rationale: This preference is based on the understanding of the multifaceted nature of hygiene, which encompasses personal, environmental, domestic, and food hygiene. Among these, food hygiene stands out as the most critical within the context of traditional markets, defined All conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain. AU's position also aligns with the principles and standards outlined in the Code of Practice CXC 1-1969, emphasizing the critical importance of specifically addressing food hygiene. This focus ensures a direct and explicit reference to the practices and conditions essential for safeguarding food safety and quality in traditional markets, thereby eliminating any ambiguity that might arise from a broader or less specific title. By maintaining this clarity, the guidelines will more effectively communicate their scope and intent, facilitating their implementation and adherence within traditional market settings.

2) Whether this set of guidelines should adopt a guidelines structure, CoP structure, or the proposed unique structure;

Position: African Union proposes that the guidelines should adopt a guideline structure

The designation as "guidelines" inherently suggests a need for consistency with the standard structure prescribed by Codex for such documents. Adopting a guideline structure reinforces the document's intent and utility as a guiding document.

Agenda Item 9: Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (CXC 1-1969), CX/FH 24/54/10, CL 2024/12/FH**Background**

During the 53rd session of the Codex Committee on Food Hygiene (CCFH53) in 2022, the Codex Secretariat highlighted a request from CAC45 (2022) for CCFH to align all food hygiene texts with the updated General Principles of Food Hygiene (CXC 1-1969), following its revision. This is a foundational text, referenced across various Codex documents, and has recently undergone a comprehensive update to ensure its relevance and applicability. Since its initial adoption in 1969, CXC 1-1969 has been revised four times. As a result of the most recent revisions adopted by CAC45, other Codex food hygiene texts may no longer follow the same format as, or cross-reference correctly to, CXC 1-1969.

CCFH53 tasked the United Kingdom with preparing a document for the next session (CCFH54) to begin this alignment process, focusing on maintaining consistency across Codex documents without modifying the standards themselves. The United Kingdom committed to leading this initiative, proposing strategies for effective alignment and reporting on progress at CCFH54.

The discussion paper (CX/FH 24/54/10 Add. 1) presents several questions and options for aligning Codex texts developed by CCFH with the revised CXC 1-1969. The three options for alignment presented in the discussion paper are

Option 1 – Simple alignment

- Existing documents are revised with an updated reference to the correct section of CXC 1-1969 using a correlation table No other changes would be made.

Option 2 – Full structural alignment

- As Option 1 but with existing texts structurally aligned to follow the same format as the revised CXC 1-1969.

Option 3 – Full structural and technical alignment with CXC 1-1969

- As Option 2 with detailed review of definitions in each text and consideration of how changes and definitions in CXC 1-1969 will impact on the document being revised. Further scrutiny of references to GHPs and HACCP to ensure that they are being used correctly.
- Review of sections to propose areas where texts can be streamlined to refer to CXC 1-1969 thereby future-proofing CCFH texts as far as possible.
- This option (like Options 1 and 2) does not consider technical changes to the content of the texts based on updated science and evidence.

Position: The African Union supports new work to align Codex texts, as developed by the Codex Committee on Food Hygiene (CCFH), with the updated General Principles of Food Hygiene (CXC 1-1969). AU further agrees with the following recommendations

- i. The work is prioritized, divided, and integrated into the future work plan.
- ii. A standing working group is created to consider how the alignment of existing texts should be prioritized, how work can be divided, and to work with the Chairperson of the EWG on the forward work plan to update the future work plan.

Considering the long-term benefits of clarity, consistency, and applicability in Codex food hygiene texts, AU recommends option 3. Despite its greater initial investment in terms of time and resources, this option offers the most comprehensive solution to the current misalignments and inconsistencies with the revised CXC 1-1969. By fully integrating structural and technical updates, Option 3 not only addresses current discrepancies but also positions the Codex texts for easier updates and alignments in the future, thus providing a more sustainable solution. Moreover, ensuring that all references and definitions are in line with the latest food hygiene principles will enhance global food safety standards, benefiting food business operators and consumers alike.

Agenda Item 10: Revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012), CX/FH 24/54/11

Position: African Union supports revising the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012). There is need to safeguard public health against the risks posed by foodborne viruses, which have become increasingly prominent. The incorporation of recent scientific developments in virus detection and risk assessment into the guidelines will empower Codex members to strengthen their national food safety systems. This is particularly crucial for regions heavily reliant on agriculture and food exports, where improved food hygiene standards can significantly mitigate the risk of trade disruptions caused by foodborne illnesses.

Agenda Item 11: Discussion Paper on the Revision of Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011), CX/FH 24/54/12

Position: African Union supports the new work proposal to revise the Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011), and recommends that CCFH54 forwards this proposal to CAC47(2024) for approval. The proposed revisions are timely and necessary to reflect the evolving landscape of food safety, particularly in light of the increased understanding of pathogen behavior and control mechanisms. For African countries, where agriculture and poultry farming are vital components of the economy and food security, updating these guidelines will provide clear, science-based guidance to enhance food safety measures from farm to table. This will help in controlling and reducing the incidence of foodborne illnesses and also enhance trade opportunities by ensuring compliance with international food safety standards.

Agenda Item 12: Discussion Paper on the Revision of Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods (CXG 61-2007) CX/FH 24/54/13

Position: African Union supports the new work proposal to revise the Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods (CXG 61-2007) and recommends that CCFH54 forwards this proposal to CAC47(2024) for approval. African Union supports this work due to the significant public health implications of *Listeria monocytogenes* in foods, particularly in ready-to-eat products. Updating the guidelines to include the latest scientific findings and risk assessment methodologies will enhance food safety, protect consumer health, and support the continent's agricultural and trade.

Agenda Item 13: Other Business and Future Work - New Work / Forward Workplan (Proposals in Reply to CL 2023/30-FH) CX/FH 24/54/14**Background**

CCFH53 (2022) approved the forward proposed work plan and requested the Secretariat to solicit new work proposals through a circular letter. Additionally, the Committee decided to reconvene the Working Group for Establishing CCFH Work Priorities, under the leadership of the United States, to coincide with CCFH54. This group's task is to review new work proposals and revise the work plan as needed. Following the circular letter (CL 2023/30-FH, issued in March 2023 with an initial deadline of September 1, 2023, extended to November 2023), four proposals for new work were submitted:

- i. Canada and the Netherlands proposed updating the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012).
- ii. The United States, Brazil, and Honduras suggested revising the Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011).
- iii. Canada, France, and the United States proposed amendments to the Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007).
- iv. The United Kingdom responded to a request from CAC45 (2023) to align Codex texts developed by CCFH with the updated General Principles of Food Hygiene (GPFH) (CXC 1-1969).

African Position

African Union supports the four new work proposals received in response to CL 2023/30-FH, and as detailed above in the African Positions on Agenda items 9-12.