CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-sixth Session

COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 53RD CODEX COMMITTEE ON FOOD HYGIENE[1]

BACKGROUND

1. This document compiles the comments on the draft standards submitted at Step 8 or Step 5/8 of the Procedure. The comments are those received through the Codex Online Commenting Systems (OCS), or via email by the time this document was issued. The comments are as shown in Appendices I and II.
2. OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

EXPLANATORY NOTES ON APPENDICES I, II

3. The comments received are presented in a table format, with two columns as follows:
    - **First column –** Presents the comments with the rationale.
    - **Second column –** Presents the provider of the comments (name of Member or Observer)

[1] This document compiles comments submitted through OCS, or via email by the time this document was issued, in reply to CL 2023/28/OCS-FH and CL 2023/29/OCS-FH

Appendix I

COMMENTS IN REPLY TO CL 2023/28/OCS-FH - REQUEST FOR COMMENTS AT STEP 5/8 ON THE DRAFT GUIDELINES FOR THE CONTROL OF SHIGA TOXIN-PRODUCING ESCHERICHIA COLI (STEC) IN RAW BEEF, FRESH LEAFY VEGETABLES, RAW MILK AND RAW MILK CHEESES, AND SPROUTS

Comments of Canada, Chile, Colombia, Costa Rica, Cuba, Ecuador, Indonesia, Iraq, Kenya, Mexico, New Zealand, Peru, Senegal, Singapore, Thailand and Uruguay

COMMENT	MEMBER / OBSERVER
Canada agrees that the Guidelines for the control of Shiga Toxin-producing *Escherichia Coli* (STEC) in raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts is ready for adoption at step 5/8	**Canada**
Chile considers that the guide for the control of Shiga Toxin-producing *Escherichia Coli* (STEC) in raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts is ready to proceed to the step 5/8	**Chile**
Estamos de acuerdo con la aprobación del texto.	**Colombia**
Costa Rica apoya el avance de estas directrices al T5/8.	**Costa Rica**
Cuba agradece la oportunidad de expresar sus comentarios a la carta circular CL 2023/28/OCS-FH, y apoyamos el documento que se propone en la misma, considerando que puede ser muy beneficioso e importante tenerlo en cuenta por toda la cadena alimentaria y las autoridades competentes y sanitarias en su implementación..	**Cuba**
Ecuador agradece a la Presidencia del Grupo de Trabajo, la oportunidad de emitir comentarios en la construcción de la referida norma alimentaria; en tal virtud y una vez revisado el proyecto de norma propuesto, informamos que no se ha encontrado objeción u observación a dicho proyecto, el mismo se ajusta correctamente a los criterios de inocuidad y seguridad alimentaria; sin embargo, nos permitimos realizar la siguiente sugerencia: 1. Numeral 57 Se sugiere aumentar el siguiente texto: Para la determinación de genes de resistencia, factores de virulencia, elementos móviles, espoligotipos y otros genes marcadores, se puede emplear la secuenciación de genoma completo. Esta técnica permitirá caracterizar brotes, determinando si un brote es monoclonal o policlonal a través de análisis de genómica comparativa, lo que incide directamente en las estrategias de manejo y contención.	**Ecuador**
In general, Indonesia supports the adoption of the Guidelines for the Control of STEC for General Section, Annex I and Annex III, at Step 5/8. This guideline is quite generic, flexible, and non-prescriptive (with some illustration) allowing us to adopt is for our own policy with some relevant adjustments/modification. However, to be consistent with the terms used throughout the document, we propose to change the term “potable water” in Para 70 into “fit-for-purpose water”. This also in line to the agreement of the Committee mentioned in REP23/FH Para 51.	**Indonesia**
Iraq supports the adoption of the Guidelines for the control of Shiga Toxin-producing *Escherichia Coli* (STEC) in raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts at step 5/8	**Iraq**
Kenya finds these guidelines (General Section, Annex I on raw beef and Annex III on raw milk and raw milk cheeses) acceptable and therefore supports the advancement of the draft to Step 5/8 for adoption by the Codex Alimentarius Commission. Rationale: Kenya finds no outstanding issues in the General Section, Annex I on raw beef, and Annex III on raw milk and raw milk cheeses. From the discussion of CCFH53, more work is required in Appendix II. Therefore, this will allow the committee to focus on fresh leafy vegetables and sprouts at step 2/3.	**Kenya**

Se considera que el documento está listo para su adopción en el trámite 5/8	**Mexico**
New Zealand suggests making minor editorial [changes] as follows: Annex 1 Raw Beef - 56 The use of either separate knives [or knives that have been appropriately cleaned and disinfected], for dehiding and rectum removal is recommended to avoid cross- contamination of the rest of the carcass. (Rationale – in NZ, single knife systems are the norm for hygienic dressing) Annex 1 Raw Beef 64 If the gastrointestinal tract has been punctured causing a major contamination, [further work on the carcass should be managed to prevent cross contamination]. Cleaning of the environment as well as operator protective equipment and tools being used at the time of the contamination event should be undertaken as needed, to prevent cross-contamination of leading and trailing carcasses. (Rationale – carcasses are not “removed from the slaughter line” at the evisceration point the management of the event is usually done in situ with later movement to detain if needed) Annex 1 Raw Beef The carcasses are sprayed with steam and then an aspiration is performed, which fulfils a double function of eliminating and/or inactivating surface contamination. The manual device includes a vacuum tube with a hot water spray nozzle, which delivers water at approximately 82–95 °C on the surface of the carcass. The process [may be] effective at removing visible [and microbiological] contamination on the carcasses. (Rationale – some beef operators in NZ are using steam vac as a GHP enhancement tool) Annex 1 Raw Beef 93 Consider shifting this clause to go under the title VERIFICATION OF CONTROL MEASURES AND REVIEW OF CONTROL MEASURES (Rationale: lack of timeliness in results means it is more a verification tool rather than a monitoring tool). Annex III: Clause 12 concludes with 'The following are examples of measures that may be useful: ...". It is recommended that this is elevated to become its own clause (new 13) and that the wording is strengthened e.g. 'likely to be necessary' rather than stating 'useful'. Clause 18, third bullet point. Suggest that an additional step to minimise STEC transfer is the sanitising and wiping of teats. This could be added between the third and fourth bullets. Clause 19 sets out useful information related to cleaning. However, it might be useful to emphasize that milking equipment, pipelines and milk tanks should be cleaned and then disinfected. This would help to clarify that disinfection should only occur once surfaces are clean. Clause 21 refers to tanker cleaning and the option for cleaning at 24-hour	**New Zealand**

intervals. Given the earlier emphasis on cleaning, it would be better to recommend that all equipment, including tankers, are cleaned and sanitised prior to use. This is particularly important in relation to raw drinking milk. Clause 28 could be expanded to mention more in relation to consumer education and communicating caution to vulnerable consumers, especially for raw drinking milk. Clauses 29 to 31 elaborate on testing for STEC and hygiene indicator organisms. This could be expanded to mention that some countries set limits based on indicator organisms such as *E. coli* on the basis that managing hygiene provides a degree of confidence that FBOs are manging the risk of STEC in raw drinking milk or raw milk cheese.	
ANexo III, párrafo 38 dice: Cuando se detecten cepas de ECTS en la leche mezclada descargada en la planta de elaboración, se puede establecer una vigilancia reforzada de todos los proveedores. En esta situación, otra medida podría ser aumentar la frecuencia de la toma de muestras y del análisis de ECTS para evaluar el origen de la leche de la cepa, la magnitud de la contaminación y la persistencia de las cepas en la planta de elaboración. Después se deberían definir los criterios para retomar la vigilancia rutinaria. Sugerible modificar por: Cuando se detecten cepas de ECTS en la leche mezclada descargada en la planta de elaboración, se puede establecer una vigilancia reforzada de todos los proveedores. En esta situación, otra medida podría ser aumentar la frecuencia de la toma de muestras y del análisis de ECTS para evaluar el origen de la leche que contiene la cepa, la magnitud de la contaminación y la persistencia de las cepas en la planta de elaboración. Después se deberían definir los criterios para retomar la vigilancia rutinaria. Párrafo 39. Dice: Los OEA pueden utilizar la información obtenida mediante las pruebas para los microorganismos indicadores a fin de verificar las medidas de control de la ECTS, debido al elevado costo de las pruebas de detección de la ECTS y su baja prevalencia en los alimentos. Sugerible modificar por: Los OEA pueden utilizar la información obtenida mediante las pruebas para microorganismos indicadores de higiene, a fin de verificar las medidas de control de la ECTS, debido al elevado costo de las pruebas de detección de la ECTS y su baja prevalencia en los alimentos.	**Peru**
Compte tenu de l'importance de ce travail, le Sénégal appuie l'adoption des Directives pour la maîtrise des STEC dans la viande de bœuf, le lait cru et les fromages produits à partir de lait cru." Le Sénégal aimerait cependant apporter les amendements suivants Définition de bœuf cru : « Chair des muscles provenant d'un bovin abattu, y compris les coupes primaires, les coupes sous primaires et les parures. » s'il s'agit de chair destinée à être mangée crue, Nous pensons que la définition est incomplète. Pour la Figure 1 : Exemple de diagramme des opérations pour la production primaire et la transformation de viande de bœuf crue (cf. Page 48 du rapport). Dans la section abattage Halal, le Sénégal propose d'éliminer l'étape de l'étourdissement.	**Senegal**
Singapore supports the adoption of the draft guidelines (i.e. General Section, Annex 1 Raw beef and Annex 3 Raw milk and raw milk cheese) at Step 5/8. As STEC is a microbial hazard with public health implications worldwide, it would be useful to have such guidelines made available. These guidelines are necessary due to the diverse production and manufacturing processes associated with different commodities. The control of STEC varies across food chain sectors and requires distinct management approaches. The General Section furnishes information concerning STEC control for specific commodities, thus facilitating informed risk management decisions. This will help food	**Singapore**

business operators and competent authorities around the world to apply existing Codex provisions for food hygiene to address this concern.	
Thailand agrees on the guidelines of Shiga Toxin-producing *Escherichia Coli* (STEC) in raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts and has no further comment	**Thailand**
Uruguay agradece la invitación a participar y el trabajo realizado. Concuerda con el documento en general. No tiene comentarios a agregar.	**Uruguay**

Appendix II

COMMENTS IN REPLY TO CL 2023/29/OCS-FH - REQUEST FOR COMMENTS AT STEP 5/8 ON THE DRAFT GUIDELINES FOR THE SAFE USE AND REUSE OF WATER IN FOOD PRODUCTION AND PROCESSING

Comments of Canada, Chile, Colombia, Costa Rica, Cuba, Ecuador, Iraq, Kenya, Mexico, Peru, Senegal, Singapore, Turkiye and Uruguay.

COMMENT	MEMBER / OBSERVER
Proposed change: Figure 1 on page 4 of the General Section. There currently is only a "NO" possibility for the box “are microbiological hazards absent?”. Canada believes that there should be a "YES" option with an arrow pointing to the “fit –for purpose” box. Canada believes that this was an omission/error when the table was reformatted from CRD20 (CCFH53) to the adopted version in the CCFH53 report and the version in CL 2023/29/OCDS-FH. Canada does not recall a discussion to remove this arrow in Figure 1 during the session. The CCFH53 report makes no mention of this change either. With the proposed change above, Canada considers the Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (General Section and Annex I on Fresh Produce) to be ready for adoption.	**Canada**
Chile considera que el documento puede pasar a trámite 5/8	**Chile**
Estamos de acuerdo con la aprobación del texto.	**Colombia**
Costa Rica apoya el avance de estas directrices al trámite 5/8.	**Costa Rica**
Cuba agradece poder expresar sus comentarios al documento que refiere la carta circular CL 2023/29/OCS-FH y considera muy importante y beneficioso su implementación en la gestión de riesgos en el uso y reutilización inocuos del agua en la producción y elaboración de alimentos para todas lass aprtes interesadas en la cadena alimentaria	**Cuba**
Ecuador agradece a la Presidencia del Grupo de Trabajo, la oportunidad para poder aportar con su criterio técnico en la construcción de la referida norma alimentaria; en tal virtud y una vez revisado el proyecto de norma propuesto, informamos que no se ha encontrado objeción u observación a dicho proyecto, el mismo se ajusta correctamente a los criterios de inocuidad y seguridad alimentaria; sin embargo, nos permitimos realizar la siguiente sugerencia: Incorporar los siguientes estudios de evaluación destinados a caracterizar la microbiota presente en el agua: • Análisis de riesgo para identificar los patógenos microbiológicos en el agua destinada al procesamiento de alimentos y evaluación de las medidas de control necesarias para minimizar la exposición a estos patógenos. • Monitoreo y detección temprana de agentes patógenos a partir de análisis de microbiología convencional y genómica. El poder caracterizar la microbiota permitiría tener una línea base sobre la diversidad y abundancia de microorganismos	**Ecuador**
Iraq supports the adoption of the Guidelines for the safe use and reuse of water in food production and processing at step 5/8.	**Iraq**
Kenya finds these guidelines (General Section and Annex I on Fresh Produce) acceptable, and therefore supports the advancement of the draft to Step 5/8 for adoption by the Codex Alimentarius Commission. Rationale: Kenya finds no outstanding issues in the General Section and Annex I on Fresh Produce. From the discussion of CCFH53, more work is required in Appendix II and Appendix III. Therefore, this will allow the committee to focus on redrafting Annex II on Fishery Products at step 2/3 and initiate the development of Annex III on Dairy Products	**Kenya**

Se considera que el documento está listo para su adopción en el trámite 5/8	**Mexico**
Se realizan las siguientes observaciones de editorial: Parrafo 13. Dice: Aguas residuales: Agua usada que se ha resultado contaminada por actividades humanas. Se sugiere modificar por: Aguas residuales: Agua usada que ha sido contaminada por actividades humanas. Párrafo 32, 33, 34, 35, 36, 37. Dice: (…)Se recomienda que, en estos casos, la temperatura del agua de lavado inicial sea 10 °C superior a la del producto fresco, si es posible. Se sugiere modificar por: (…)Se recomienda que, en estos casos, la temperatura del agua de lavado inicial sea 10 °C, superior a la del producto fresco, si es posible.	**Peru**
le Sénégal encourage l'adoption de ces directives car elles seront utiles aux exploitants du secteur alimentaire et aux autorités compétentes pour garantir la qualité de l'eau dans la production et la transformation des aliments.	**Senegal**
Singapore supports the adoption of the draft guidelines (i.e. General Section and Annex 1 Fresh produce) at Step 5/8, as the guidelines provide practical guidance (e.g. decision support system tools) for food business operators and competent authorities using a risk based microbiological approach for the use and reuse of water. The approach evaluates the risk and potential mitigation using a framework of general principles and provide examples of applications for the use and reuse of water to ensure water used is fit for its intended purpose and the finished products are safe for consumption.	**Singapore**
Türkiye would like to thank Honduras, which is the chair of the EWG and other EWGs members. Our proposals are as below. Paragraph 15 / second indent; in order to eliminate the confusion Türkiye would like to ask which kind of chemical treatments are mentioned should be clear. Therefore, "chemical water treatment" should be changed as "chemical water treatment for instance biocides that are approved by the competent authority," Paragraph 48 / eighth indent; Türkiye would like to highlighted that climate change is the important contributors to the global burden of disease and mortality, including malnutrition, communicable / non-communicable and diarrheal / vector borne diseases. During and after a natural disaster such as flood or excessive temperatures, both food safety and food security are getting under risk. Therefore, bacteria, viruses and parasitic protozoa are caused illnesses especially water-borne illness. Although chorine is the most known and used biocide / disinfectant in the world, chlorine shou	**Turkiye**
Uruguay agradece el trabajo realizado, concordando con el documento en general.	**Uruguay**