

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 7, 8 and 9

CRD08

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fiftieth Session

Panama, 12 – 16 November 2018

Comments of Nigeria

1. Agenda Item 5

Question 1: There has been mixed views about this table –views are requested on whether it is useful or whether it should be deleted

- a. Nigeria would like to thank the Chair - United Kingdom and the Co-Chairs - France, Ghana, India, Mexico and the United States on this work. Nigeria agrees to retain the table, as it clarifies the relationship between GHP and HACCP for better understanding and application.

Nigeria has the following specific comments:

- b. **Issue/Background**

Para. 17. Definition of “**clean Water**” *“as water that does not contain biological or chemical contaminants at a level that will not compromise the safety and suitability of the food”*

Nigeria suggests the inclusion of “**physical**” as one of the contaminants/ hazards

Rationale

Physical contaminants are part of contaminants/hazards that can compromise the quality, safety and suitability of clean water.

- c. **Issue/Background**

Para. 31: Use of the term “**Equipment**” in square bracket on **Hygienic design and layout of food establishment [and equipment]**

Position

Nigeria supports the removal of the square brackets and proposes the sentence to read as follows: “Hygienic design, layout of food establishment and equipment”.

- d. **Issue**

Para. 42 “adequate means of washing and drying hands, including soap (**preferably liquid soap**)”

Position

Nigeria proposes that **liquid soap** should replace **Soap**. The sentence to read that “adequate means of washing and drying hands including liquid soap”

Question 4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?

- e. **Issue**

Para. 43 **Temperature control**

Nigeria agrees to the inclusion of additional paragraph to discuss monitoring of temperature of premises, equipment and food.

Rationale: This will contribute to effective food control system.

- f. **Issue**

Para. 66

Microbiological, chemical and physical specifications

The sentence “FBOs should consider that when the initial overall contamination level in raw material is low (e.g. 103 cfu/g), the required degree of heat treatment (in this case, for example, 5 log reduction) is also low”.

“Nigeria proposes to add that “certain degree of treatment may be required at different levels of contamination for specific raw materials”.

g. Para. 72

Reference to allergen guidance document

Position

Nigeria supports the inclusion to reference allergen guidance document.

h. Para. 73

Incoming Materials

Nigeria agrees that the title “Incoming materials” be retained in the document.

i. Para. 75

Water supply

Nigeria proposes that definition of “potable water” be included in the document.

j. **QUESTION 5:**

ESTABLISHMENT [CLEANLINESS] [SANITATION], MAINTENANCE AND PEST CONTROL

Nigeria agrees that the square brackets be removed to read “Establishment Cleanliness, Sanitation, Maintenance and Pest Control.

Rationale:

Cleanliness is different from Sanitation.

k. Para. 96

Monitoring Effectiveness

Nigeria agrees that the title be retained in the document.

l. Para. 107:

Use of either the term ‘communicable disease’ or “disease or illness.”

Position

Nigeria recommends the use of the words ‘communicable disease’ instead of “disease or illness.”

Rationale

The standard term used is “communicable disease” and not “disease or illness.”

m. Para. 113: **Guidance to use soap without specifying the form in which the soap should be used to avoid contamination.**

Position

Nigeria proposes that “soap” be replaced with “liquid Soap” in the document as follows” To clean the hands, personnel should wash with liquid soap and water by wetting hands with water and applying sufficient liquid soap to cover all surfaces; rinse hands with clean water”

Rationale: This is to avoid contamination of the hand with soap

n. Para. 135: **The inclusion of ‘validation’ in HACCP Principle 6**

Nigeria supports the inclusion of validation in HACCP Principle 6, instead of in Principle 3

Rationale: Validation in principle 6 is more appropriate because it is a way of confirming that the HACCP system is effective.

o. Para .142:

Flexibility for small and/or less developed food businesses

Nigeria proposes that the square brackets be removed to read as follows: "This flexibility should take into account, the nature and size of the operation, including...."

Rationale: The nature and size of the business are important in establishing Food Management System.

p. Para . 158

Q7 decision tree at Diagram 2

Nigeria wishes to thank Brazil for modifying the decision tree. However, Nigeria has reservation on the term "Higher GHP" as it creates ambiguity and therefore suggests that the term "Higher GHP" be clarified.

q. Para. 170

Q8 Establish validation and verification procedures (Step 11 and Principle 6)

Nigeria supports additional text on establishment validation and verification procedures in (Step 11 and 6).

r. Para. 170

"Where possible, validation is performed during development of HACCP Plan.

Propose the removal of the phrase "**Where possible**"

Rationale: This is because it makes validation of CCP of HACCP optional.

s. Para. 180:

Specifying the targets for HACCP training as being personnel in the industry, government and academia.

Position:

Nigeria supports training as a general requirement in the document.

Agenda Item 6

REVISION OF THE CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS (CXC 52-3002) AND REVISIONS OF THE SECTION ON SAMPLING, EXAMINATION AND ANALYSES RELATED TO HISTAMINE FOOD SAFETY - CX/FH 18/50/6

Nigeria would like to appreciate the work of the EWG led by Japan and the United States of America.

Nigeria has the following specific suggestions and comments:

a. Para. 10: Placement of the adopted histamine guidance control in the Code of Practice for fish and fishery products (CXC 52-2003).

Position

Nigeria supports the placement of the proposed histamine control guidance in the Code of Practice of Fish and Fishery Products.

Rationale

It provides further guidance in the document.

Issue/Background

b. Para. 7.1 - Appendix II: "*Freshly harvested fish typically have histamine levels below 2 mg/kg and that operators applying HACCP may achieve a histamine level of less than 15 mg/kg.*"

Position

Nigeria recommends the removal of the example that makes reference to 15mg/kg for histamine.

Rationale: The example can be mistaken for acceptance criteria

Agenda Item 7**1. PROPOSED DRAFT CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS CX/FH18/50/7**

Nigeria wishes to thank and congratulate Australia, UK and United State as Co-Chairs of the EWG for the development of the first version of the Code of Practice on food allergen management for food business operators.

Agenda Item 8**3. PROPOSED DRAFT GUIDANCE FOR THE MANAGEMENT OF (MICRO) BIOLOGICAL FOODBORNE CRISES/OUTBREAKS**

Nigeria wishes to thank Denmark, the EU and Chile and Co-Chairs of the EWG for the development of the draft guidance for the management of (Micro)biological food borne crisis/outbreaks.

Issue/Background

- a. Title:** Should the parenthesis in the title be deleted so the document only covers management of microbiological food borne outbreaks?

Nigeria supports the removal of the brackets in (Micro) biological but recommends the title to read “**Microbiological**”.

Rationale

The document should focus on microbiological food borne outbreaks.

b. Issue/Background

Is the use of the term “**food safety emergencies**” for all type of outbreaks feasible regardless of their severity?

Nigeria agrees that the square brackets should be removed.

Rationale

Foodborne disease may vary in their degree of severity

c. Issue/Background

Para. 5, Bullet 6: Are there relevant topics that we should address and which do not appear in the document?

Position: Nigeria has no other topic to address outside this document

Rationale: All major relevant topics were outlined in the text.

Para 42.

d. Issue/Background

Par. 5, Bullet 7: Should we introduce graphic explanations/diagrams in the guideline although this is not normal practice in Codex text e.g. description of the network structures and monitoring?

Position

Nigeria does not support the introduction of graphic explanations/diagrams in the guidelines.

Rationale: There will be no uniform application of the graphic/term because food safety management structures vary across member state.

Issue/Background

Use of the term “food borne illness” outbreaks

Para. 39: Reference to food safety emergencies/incidents/events being caused only by biological hazards.

Position

Nigeria recommends the focus on the use of term “microbiological”.

Rationale: This is because most of the outbreaks are microbiological in nature.

Agenda Item 9**2. Control of Shiga Toxin-Producing *Escherichia coli* (STEC) in Beef, Unpasteurized Milk and Cheese produced from Unpasteurized Milk, Leafy Greens, and Sprouts**

Nigeria wishes to thank the United States of America, Chile and Uruguay on the development of the Discussion Paper. Nigeria recommends that future work on Toxin-Producing *Escherichia coli* (STEC) by the Committee should address all categories of food associated with human STEC illness as a measure of the risk.