



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty- third Session

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Comments of Thailand

Agenda Item 5 Proposed 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

Thailand appreciates the opportunity to comment on the report of the PWG. We would like to provide comment as follows:

After listening to the discussion in the plenary on Section 10.3.2 Regulatory systems (paragraph 49), we are of the opinion that the competent authorities may or may not prioritize their work specifically for validating the documented process control of the FBO on STEC. So, Thailand would like to support the use of the word 'may' as originally appeared in CRD13.

The competent authority **may** assess the documented process control systems to ensure they are science based and establish verification frequencies. Microbiological testing programmes, or molecular testing programmes, should be established to verify the effectiveness of control measures for STEC.

Agenda Item 6 Proposed Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing

Thailand appreciates the opportunity to comment on the report of the PWG. We would like to provide comment as follows:

1. Definition of 'water fit for purpose'

Thailand reaffirms our preference of Option 1 for the definition of 'water fit for purpose'. However, we also agree with the proposal provided in the report of PWG, provided that the definition of 'water risk assessment' is to be deleted:

Water fit for purpose: water that is determined to be safe for an intended purpose through **a risk-based evaluation of potential microbiological hazard**, an assessment of potential hazards, treatment options and their efficacy, control measures, history of use, and the end use of the food product.

2. Definition of 'clean water'

Definition of 'clean water' may be deleted as it has already been included in the definition of 'water fit for purpose' as long as there is an amendment to the Draft to use of the term 'water fit for purpose' instead of 'clean water' in various places of Annex 1 Fresh Produce.

3. Definition of 'Fresh produce'

The Annex on Fresh produce should be specific for high-risk product such as those consumed raw since most of the control measures suggested in the Annex is based on the Code of Hygienic Practice for Fresh Fruits and Vegetables (CXC 53-2003) of which the scope is specific to those high-risk produce. Thus, we would like to support the definition as in the report of the PWG with a deletion of 'nuts' as follows:

Fresh produce: Any fresh fruit, **nuts**, mushrooms and vegetables that are likely to be **consumed** in a raw form, either unprocessed or ~~minimally processed~~ physically altered from its original form but remaining in the fresh state (e.g., washed, peeled, cut) and that are generally considered as perishable regardless of it being intact or cut from root/stem at harvest.

The alternative is to add the text similar to the sentences that we have proposed in the CX/FH 22/53/6 Add.1 to the Section on Use or Definitions for clarification as follows:

Requirements in this Annex is particularly suitable for fresh produce intended to be consumed raw. For fresh produce that is rarely consumed raw, the requirements should be modified in accordance with the associated risk.

To exclude nuts

Also, requirements on water use for nuts are different from the other fresh produce (fruit, mushroom and vegetables). Water does not directly contact the nuts itself during pre-harvest. Products of nut are dried and heat treated before consumption. For fresh nuts, can they be recognized as vegetables? Thus, nuts should not be included in the definition of fresh produce.

Agenda Item 9 New Work / Forward Workplan

Thailand would like to provide comment on the proposal to establish a draft Guidelines for Food Hygiene Control Measures in Traditional Food Markets as follows:

Thailand is of the opinion that the food business operators in traditional food market in different regions have different practices which may affect the implementation. In development of the single document for every region, it is challenging to set up the control measures to appropriately cover practices for all regions. Also, the detail should not be repetitive or contradictory with the existing regional Guidelines. Thus, in case the Committee decides to develop this draft Guidelines, these issues should be taken into consideration during drafting.