

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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Geneva, Switzerland, CIGG

25-30 November 2024

COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 54TH SESSION OF THE CODEX COMMITTEE ON FOOD HYGIENE FOR ADOPTION BY THE 47TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

BACKGROUND

1. This document compiles the comments on the draft standards submitted at Step 5 and 5/8 of the Procedure and other matters as indicated in the relevant Circular Letter ([CL 2024/63-CAC](#)). The comments are those received through the Codex Online Commenting Systems (OCS)¹, or via email by the time this document was issued. The comments are as shown in Appendix I.

EXPLANATORY NOTES ON APPENDIX I

2. 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 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.

Appendix I

REVISION TO THE GUIDELINES ON THE APPLICATION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF PATHOGENIC VIBRIO SPECIES IN SEAFOOD (CXG 73-2010)

(AT STEP 5)

COMMENTS IN REPLY TO CL 2024/63-CAC

Comments by Chile, Colombia, Costa Rica, Ecuador, Egypt, Indonesia, Paraguay, Peru, and United Kingdom

COMMENT	MEMBER / OBSERVER
Chile Agradece oportunidad de participar en estos trabajos. Chile apoya la adopción de los documentos. Saludos cordiales.	Chile
El documento se encuentra listo para su adopción	Colombia
Costa Rica apoya en avance de la revisión de estas Directrices al trámite 5.	Costa Rica
El país está de acuerdo en apoyar la adopción.	Ecuador
Egypt supports the view that “Water fit for purpose” is a very broad and general term that includes all types of water, from clean water, clean sea water, potable water.....etc. The type of water used in each stage shall be precisely determined according to the different purposes for which the water is used. Regarding item No. (6) , Egypt recommends with simple amendment version to “Clean water” and “Water fit for purpose” definitions for more clarification as follow: Clean water: Water that does not meet the criteria for potable water but does not compromise the safety of the food in the context of its use. Such as water used for cleaning food contact surface mainly used for preparation of ready to eat food. Water fit for purpose: Water that is determined to be safe for an intended purpose through the identification, evaluation, and understanding of potential microbiological hazards and other relevant factors (e.g. history of use, the intended use of the food, etc.), including the application of control measures such as treatment options and their efficacy to ensure effective elimination or mitigation of such hazards. For example: Water used for separating the entrails from the meat and cleaning fish.	Egypt
Indonesia supports the adoption of: 1. Revision to the Guidelines on the Application of the General Principles of Food Hygiene to the control of Pathogenic Vibrio Species in Seafood .	Indonesia
Paraguay apoya la adopción de los textos mencionados en el documento para su aprobación en el Trámite 5 y 5/8.	Paraguay
The UK finds the text ready for adoption at Step 5. The UK would like to see the text stating “seafood to ionising energy, e.g...;” revised to “exposing seafood to ionising energy...” in In Section 13.2.2.3 (para 83).	United Kingdom

**DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 54TH SESSION OF THE CODEX
COMMITTEE ON FOOD HYGIENE FOR ADOPTION BY THE 47TH SESSION OF THE
COMMISSION**

(AT STEP 5/8)

COMMENTS IN REPLY TO CL 2024/63-CAC

*Comments by Chile, Colombia, Costa Rica, Ecuador, Egypt,
Indonesia, Paraguay, Peru, United Kingdom and GAIN*

COMMENT	MEMBER / OBSERVER
<p align="center">ANNEX II ON FRESH LEAFY VEGETABLES 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 (CXG 99-2023)</p>	
<p>Chile Agradece oportunidad de participar en estos trabajos. Chile apoya la adopción de los documentos.</p> <p>Saludos cordiales.</p>	Chile
<p>Anexo II sobre las hortalizas de hoja frescas de las <i>Directrices para el control de la Escherichia Coli productora de toxina Shiga (ECTS) en la carne de bovino cruda, las hortalizas de hoja frescas, la leche cruda y los quesos a base de leche cruda y las semillas germinadas (CXG 99-2023)</i>, párrafo 52, Apéndice II</p> <p>El documento se encuentra listo para su adopción</p>	Colombia
<p>Anexo II sobre las hortalizas de hoja frescas de las <i>Directrices para el control de la Escherichia Coli productora de toxina Shiga (ECTS) en la carne de bovino cruda, las hortalizas de hoja frescas, la leche cruda y los quesos a base de leche cruda y las semillas germinadas (CXG 99-2023)</i>, párrafo 52, Apéndice II</p> <p>Costa Rica apoya la adopción el anexo II, III, IV y VI al trámite 5/8.</p>	Costa Rica
<p>El país está de acuerdo en apoyar la adopción de los anexos.</p>	Ecuador
<p>Indonesia supports the adoption of:</p> <ol style="list-style-type: none"> 2. Annex II on Fresh Leafy Vegetables 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 3. Annex IV on Sprouts 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 4. Annex III on Milk and Milk Products of the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing 5. Proposed Draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food 	Indonesia
<p>Paraguay apoya la adopción de los textos mencionados en el documento para su aprobación en el Trámite 5 y 5/8.</p>	Paraguay
<p>Anexo II sobre las hortalizas de hoja frescas de las <i>Directrices para el control de la Escherichia Coli productora de toxina Shiga (ECTS) en la carne de bovino cruda, las hortalizas de hoja frescas, la leche cruda y los quesos a base de leche cruda y las semillas germinadas (CXG 99-2023)</i>, párrafo 52, Apéndice II Párrafo 17</p> <p>Edición DICE: Dependiendo de la fuente de agua y de las directrices de la autoridad competente, los productores deberían valorar la calidad..."</p>	Peru

<p>DEBE DECIR: "Dependiendo de la fuente de agua y de las directrices de la autoridad competente, los productores deberían evaluar la calidad..."</p> <p>Traducción DICE: "...o transferir STEC a las hortalizas de hoja frescas".</p> <p>DEBE DECIR: "...o transferir ECTS a las hortalizas de hoja frescas"</p>	
<p>The UK finds the text ready for adoption at Step 5/8.</p>	<p>United Kingdom</p>
<p>ANNEX IV ON SPROUTS 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 (CXG 99-2023)</p>	
<p>The UK finds the text ready for adoption at Step 5/8.</p>	<p>United Kingdom</p>
<p>ANNEX III ON MILK AND MILK PRODUCTS OF THE GUIDELINES FOR THE SAFE USE AND REUSE OF WATER IN FOOD PRODUCTION AND PROCESSING (CXG 100-2023)</p>	
<p>The UK finds the text ready for adoption at Step 5/8.</p>	<p>United Kingdom</p>
<p>Subtítulo 4 Traducción/ Técnico DICE: Permeado: líquido derivado de la leche u otros productos lácteos que se obtiene tras eliminar componentes de la leche mediante filtración por membrana, microfiltración (MF), ultrafiltración (UF), nanofiltración (NF), ósmosis inversa (OI) u ósmosis inversa y pulido (OIP).</p> <p>DEBE DECIR: Permeado: líquido derivado de la leche u otros productos lácteos que se obtiene tras separar o remover algunos componentes de la leche mediante filtración por membrana, microfiltración (MF), ultrafiltración (UF), nanofiltración (NF), ósmosis inversa (OI) u ósmosis inversa y pulido (OIP) El Perú agradece al Comité del Codex sobre Higiene de los Alimentos (CCFH), por el esfuerzo emprendido a la fecha y en relación al contenido del Apéndice IV contenido en el REP 24/FH, al respecto, los miembros de la Comisión Técnica Nacional sobre Higiene de los Alimentos, sustenta lo siguiente:</p> <p>El principio de la filtración por membranas es la separación de componentes y no la eliminación. Además, si se menciona, por ejemplo, la microfiltración, la ultrafiltración y la nanofiltración, se debe considerar que en dichos procesos no se separan del permeado todos los componentes, solo algunos. Igualmente, al referirse a este tipo de tecnologías hablamos de separación por membranas o filtración por membranas</p> <p>Numeral 13 del subtítulo 5 Traducción DICE: "Debería comprobarse visualmente la claridad y el olor de las nuevas fuentes de agua utilizadas para el enjuague, la limpieza y la desinfección de las superficies en contacto con el producto del equipo de ordeño, los tanques, los recipientes y las instalaciones para el transporte de la leche de las granjas lecheras..."</p> <p>DEBE DECIR: "Debería comprobarse visualmente la claridad y el olor de las nuevas fuentes de agua utilizadas para el enjuague, la limpieza y la desinfección de las superficies en contacto con el producto, como: el equipo de ordeño, los tanques, los recipientes y las instalaciones para el transporte de la leche de las granjas lecheras..."</p>	<p>Peru</p>

<p>Subtítulo 6.1 Recomendaciones generales Edición traducción DICE: Se deberían adoptar medidas para captar agua de forma higiénica de diversas fuentes, así como para tratarla y recuperarla lo más rápidamente posible después de su primer uso o cuando proceda de la leche, el suero u otros productos lácteos dentro de una planta de fabricación de productos lácteos.</p> <p>DEBE DECIR: Se deberían adoptar medidas para captar agua de forma higiénica de diversas fuentes, así como para recuperarla y tratarla lo más rápido posible después de su primer uso o cuando proceda de la leche, el suero u otros productos lácteos dentro de una planta de fabricación de productos lácteos.</p> <p>Se sugiere considerar la secuencia del proceso de reutilización del agua en donde primero ocurre la recuperación del agua, y posteriormente, su tratamiento.</p> <p>Numeral 40 del subtítulo 10.1. Figura 1: Esquema de la recirculación del agua utilizada para enfriar quesos</p> <p>Edición</p> <p>DICE: “Agua para bebe”</p> <p>DEBE DECIR: “Agua para beber”</p> <p>Numeral 49 del subtítulo 10.4 Sustancial 49. Los efluentes de las plantas de fabricación de productos lácteos, como las aguas residuales de elaboración de productos lácteos o las aguas cloacales (aguas residuales de duchas, baños, aseos, estaciones de lavado, etc.) que contienen agentes patógenos para el ser humano, se pueden captar, tratar y reutilizar para determinadas aplicaciones siempre que se sometan a un tratamiento adecuado y a una evaluación de idoneidad y medidas de gestión. Estos efluentes pueden contener no solo componentes lácteos que favorecen el crecimiento microbiológico, sino también otras sustancias peligrosas</p> <p>En el numeral 15 del subtítulo 5, dice: “Las aguas cloacales tratadas adecuadamente u otras aguas recogidas en la granja (por ejemplo, procedentes del enjuague, la limpieza y la desinfección, o de la posible producción de suero o lavado de quesos en la granja) pueden utilizarse, entre otros, para regar las pasturas o limpiar superficies que no estén en contacto con alimentos y que no puedan causar contaminación.”</p> <p>No incluir dentro de aguas cloacales a las aguas residuales de baños y duchas, aseos, estaciones de lavado,), como aguas tratadas que podrían reutilizarse en la elaboración de alimentos. Puesto que se contrapone a lo indicado en el numeral 15 del subtítulo 5 del documento</p>	
PROPOSED DRAFT GUIDELINES FOR FOOD HYGIENE CONTROL MEASURES IN TRADITIONAL MARKETS FOR FOOD	
The UK finds the text ready for adoption at Step 5/8.	United Kingdom
The Global Alliance for Improved Nutrition (GAIN) would like to register its strong support for the draft “Guidelines for food hygiene control measures in traditional markets for food”. (Agenda item 4.3, Codex Committee for Food Hygiene (CCFH))	GAIN
The Global Alliance for Improved Nutrition (GAIN) welcomes this opportunity to comment on the Guidelines for Food Hygiene Control Measures in Traditional Markets for Food (Agenda	

item 4.3, Codex Committee for Food Hygiene (CCFH)) for the upcoming Codex Alimentarius Commission meeting in Geneva, Switzerland. GAIN is a recognized observer organization in Codex. Working with both governments and businesses, we aim to transform food systems so that they deliver more safe and nutritious food for all people, especially those most vulnerable to malnutrition. GAIN has offices in 12 countries and operate projects in another eight countries. We partner and/or have received programme funding linked to our traditional food markets work from many national development organizations, including the United States Agency for International Development (USAID) and its Feed the Future partners; Dutch Ministry of Foreign Affairs; Irish Aid; Swiss Agency for Development and Cooperation; Department of Foreign Affairs, Trade and Development of Canada; the World Health Organization (WHO); and the Royal Norwegian Ministry of Foreign Affairs.

GAIN would like to register its strong support for the draft “Guidelines for food hygiene control measures in

traditional markets for food”. This work was led by the governments of Kenya, Nigeria and Bolivia. The proposal is well grounded in existing Codex text and the review process has been transparent and thorough. Countries from every global region provided comments, and those were well received and thoughtfully addressed by the Chair and Co-chairs.

The Food Hygiene Committee relied on existing guidance and codes of practice developed in four Codex regions to address issues with street vended food. The regions were Africa, Asia, Near East and Latin America and the Caribbean.¹ The new text borrows approaches from each regional text and provides a more uniform standard for global application. After thorough review, the CCFH is recommending adoption by the full Codex Alimentarius Commission.

TRADITIONAL MARKETS ARE VITAL TO PROTECT PUBLIC HEALTH IN LOCAL COMMUNITIES

The World Health Organization, through its Foodborne Epidemiological Reference Group, estimated that the global burden of foodborne diseases is very high, with 600 million illnesses and 420,000 deaths each year.² While the African and Southeast Asian regions experience the greatest risks from foodborne illness, addressing the causes of foodborne illness in all countries and regions is important to address malnutrition and improve the uptake of nutrients that contributes to physical and intellectual health, especially for young children. (See Figure 1.)

Each day, millions of people buy food from traditional markets for food (see Figure 2).

These markets are mini-food

environments, where the food system “meets” the consumer. They provide consumers with access to a range of nutritious food choices that are especially vital for those vulnerable to food insecurity and malnutrition, like the urban

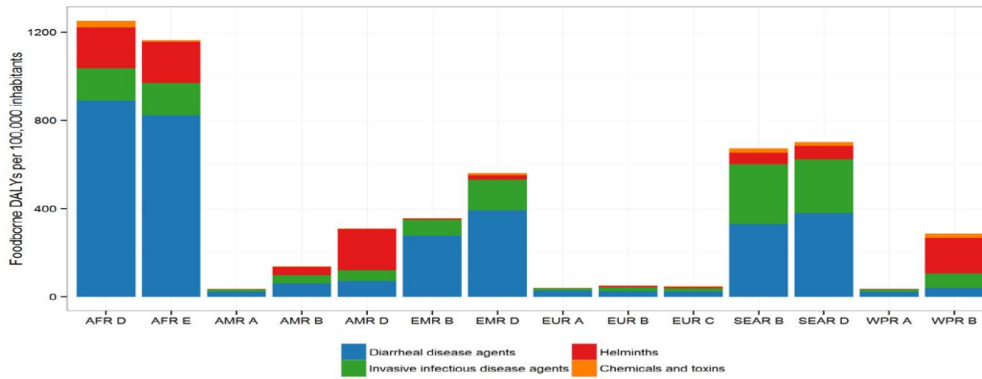
1 CODEX Regional Guidelines for the Design of Control Measures for Street-Vended Foods (Africa) CAC/GL 22R-1997; CODEX Revised Regional Code of Hygienic Practice for the Preparation and Sale of Street Foods (Latin America and the Caribbean) CAC/RCP 43R-1995/Revised in 2001; CODEX Regional Code of Practice for Street-Vended Foods (Near East), CXP 71-R 2013 (Near East Code); CODEX Regional Code of Hygienic Practice for Street-Vended Foods in Asia, CXC 76R-2017. See also DeWaal et al; Regional Codex Guidelines and Their Potential To Impact Food Safety in Traditional Food Markets; Journal of Food Protection, Vol. 85, No. 8, 2022, Pages 1148–1156 <https://doi.org/10.4315/JFP-22-052> (2022).

2 Source: The global burden of foodborne disease (DALYS per 100 000 population) by hazard groups and by subregion, 2010. found in WHO estimates of the global burden of foodborne diseases: foodborne disease burden epidemiology reference group 2007-2015.

and peri-urban poor. They are culturally important for many communities and are intersections for government, policy makers, market authorities and food group leaders.² Markets are vital to local livelihoods and as entry points to address affordability of healthy diets and to facilitate resilience with regards to food and nutrition security.^{3,4,5}

While traditional markets for food operate in every region, they are especially important in middle and low income countries to ensure access to nutritious and affordable food for consumers.^{6,7}

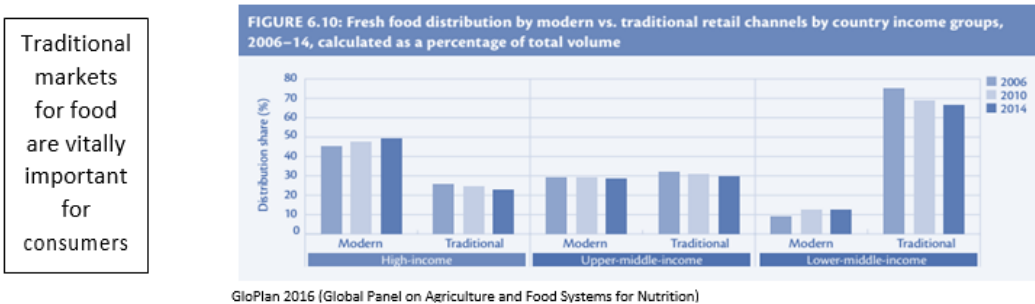
Figure 1. WHO estimates of Foodborne DALYs by region and agent



Regions: Africa (AFR); Americas (AMR); Eastern Mediterranean (EMR); European (EUR); South-East Asian (SEAR); Western Pacific (WPR).

Regions: Africa (AFR); Americas (AMR); Eastern Mediterranean (EMR); European (EUR); South-East Asian (SEAR); Western Pacific (WPR).

Figure 2. Fresh foods distribution by type of retail market



THE ROLE OF CODEX

The mission of the Codex Alimentarius is to protect the health of consumers, as well as fair practices in food trade. GAIN was pleased that the CCFH advanced the Guidelines for Food Hygiene Control Measures in Traditional Markets for Food to step 5/8. GAIN’s comments will address how the Guidelines can help governments and civil society organizations protect the health of consumers.

Addressing food safety in traditional markets is vital to reduce the global burden of foodborne disease and to facilitate improved nutrition in many low- and middle-income countries. It is imperative that Codex work quickly to advance this document, which will help market actors, such as vendors and market authorities, to identify and practice better food handling and market management with the goal to significantly reduce vendors and consumers’ exposure to food safety risks within traditional markets. Traditional markets have demonstrated their value as a food system transformative entry point.

THE GUIDELINES WILL BE USED BY GOVERNMENT ENTITIES AND MARKET LEADERS TO IMPROVE FOOD SAFETY

These guidelines offer national and local governments as well as market authorities and vendors, a shared, global and practical tool comprising hygiene control recommendations for traditional markets for food. As part of its work at the national and local levels, GAIN and other organizations can use the Guidelines to advocate with governments for adoption of the food hygiene standards recognized by Codex. Examples include:

Nigeria: Last year Nigeria recognized local food markets in their newly revised national food policy, approved by the government. This type of recognition can assist national governments in partnering with local governments on the types of controls that can best protect public health.

Kenya: Building on GAIN’s Keeping Food Markets Working During Covid-19 project, since 2022, GAIN’s Resilient Markets project works with National and County government officials as well as market authorities in five counties viz. Machakos, Kiambu, Nairobi, Nakuru and Mombasa to: install cold rooms,

build vendors capacities around nutrition, food handling and safety and food waste reduction, and to co-design and support implementation of routine, inclusive processes that strengthen local governance and management of traditional markets for food.⁸

Bangladesh: Starting with the FTF EatSafe-Keeping Food Markets Working project, GAIN has supported food safety improvement in several markets in Dhaka, in collaboration with the City Government. The working group established during this project is now led by the City Government and in consultation with GAIN, other government departments and development partners, the intention is to raise awareness and support use of the CODEX guidelines via the City Working Group and the Urban Visionary Working group.

India: After the Central Government's decision and initiative to upgrade the existing street food hubs across major cities of India, GAIN in collaboration with FSSAI (Food Safety Standards Authority of India) supported state governments in implementing the initiative by developing the Healthy and Hygienic Food Safety toolkit and an M&E framework. GAIN routinely visits these Healthy and Hygienic Food Street (HHFS) locations to assess the conditions before and after the program interventions. As a result of the successful implementation of HHSF, the Finance Minister announced their decision to launch 100 accredited food safety laboratories across the country and committed to setting up an additional 100 HHFS locations in select cities across India.

8 Drive to strengthen traditional fresh food markets launched | Nation

THE GUIDELINES WILL BE USED BY CIVIL SOCIETY TO IMPROVE FOOD SAFETY IN LOCAL COMMUNITIES

GAIN and other NGOs can utilize the Guidelines in our programs, most especially to help deliver impact with and for vulnerable communities. For example, the Guidelines will provide an important resource for GAIN in design and as a tool which others can be then also use, facilitating enduring effort and scaling. This includes food systems orientated programs, directly targeting or inclusive of safe food handling components re: educate, skill and empower food market vendors, market authorities and local governments. GAIN has developed food handling – safety linked training and food systems (covering nutrition, food handling and safety and waste) empowerment programs for market vendors and/or market authorities in countries like Nigeria, Ethiopia, Kenya, Tanzania, Mozambique, Bangladesh and Indonesia.

Other Codex observer organizations participate in the CCFH and supported the Guidelines, including the World Food Program.

¹ CODEX Regional Guidelines for the Design of Control Measures for Street-Vended Foods (Africa) CAC/GL 22R-1997; CODEX Revised Regional Code of Hygienic Practice for the Preparation and Sale of Street Foods (Latin America and the Caribbean) CAC/RCP 43R-1995/Revised in 2001; CODEX Regional Code of Practice for Street-Vended Foods (Near East), CXP 71-R 2013 (Near East Code); CODEX Regional Code of Hygienic Practice for Street-Vended Foods in Asia, CXC 76R-2017. See also DeWaal et al; Regional Codex Guidelines and Their Potential To Impact Food Safety in Traditional Food Markets; Journal of Food Protection, Vol. 85, No. 8, 2022, Pages 1148–1156 <https://doi.org/10.4315/JFP-22-052> (2022).

² Source: The global burden of foodborne disease (DALYS per 100 000 population) by hazard groups and by subregion, 2010. found in [WHO estimates of the global burden of foodborne diseases: foodborne disease burden epidemiology reference group 2007-2015](#).

³ [Food Environment Typology: Advancing an Expanded Definition, Framework, and Methodological Approach for Improved Characterization of Wild, Cultivated, and Built Food Environments toward Sustainable Diets - PubMed \(nih.gov\)](#)

⁴ <https://openknowledge.fao.org/handle/20.500.14283/cd1459en>

⁵ Source: [Frontiers | Nutritional, economic, social, and governance implications of traditional food markets for vulnerable populations in sub-Saharan Africa: a systematic narrative review \(frontiersin.org\)](#)

⁶ Source: [Frontiers | Nutritional, economic, social, and governance implications of traditional food markets for vulnerable populations in sub-Saharan Africa: a systematic narrative review \(frontiersin.org\)](#)

⁷ [Frontiers | Wet markets in Southeast Asia and access to healthy diets \(frontiersin.org\)](#)

⁸ [Drive to strengthen traditional fresh food markets launched | Nation](#)