



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

### Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food at Step 4

Comments of Argentina, Malaysia, Republic of Korea, Singapore, Rwanda and GAIN

#### Argentina

#### [English]

#### ANSWERS TO THE INQUIRIES:

- Whether the title should be retained as “Guidelines for food hygiene control measures in traditional markets for food” or changed to “Guidelines for hygiene control measures in traditional markets for food”

**Argentina prefers to maintain the title should “Guidelines for food hygiene control measures in traditional markets for food.”**

- Whether this set of guidelines should adopt a guidelines structure, CoP structure, or the proposed unique structure.

**Argentina agrees with the proposed structure.**

- Whether the structure and headings capture all the key issues to be addressed.

**Argentina agrees with the points developed.**

- Whether there are any other issues to be covered by the guidelines.

**Argentina considers that all issues are covered.**

- Considering the request of CAC46 to carefully consider the relationship between these guidelines and the existing four regional Guidelines/Codex of Hygienic Practice related to street food (e.g. 22R-1997, CXC 43R-1995, CXC 71R-2013, CXC 76R-2017), whether these guidelines might be considered as complementary to or replacement for those existing texts.

**Argentina considers these guidelines as complementary for this document.**

#### GENERAL COMMENT

**Argentina suggests advanced in the Codex Step process.**

#### SPECIFICS COMMENTS:

Paragraph 5.1.1

All food handlers in traditional markets for food should undergo daily health checks before handling food as well as a scheduled medical examination and, where necessary be certified and /or immunized.

**Argentina suggests to eliminate the paragraph. In accordance with recommendations from the World Health Organization, since 1989, it considers that medical examinations or examinations of personnel who handle food are only valid for the moment they are carried out, lacking value for the prevention of food-borne diseases (page 34 item 7:**

**[https://iris.who.int/bitstream/handle/10665/38647/WHO\\_TRS\\_785\\_spa.pdf?sequence=1&isAllowed=y](https://iris.who.int/bitstream/handle/10665/38647/WHO_TRS_785_spa.pdf?sequence=1&isAllowed=y)**)

Paragraph 6.5.3

~~Toilets and sanitary facilities –Every traditional market for food should have easily accessible toilets and~~ **sink for hand washing** ~~other sanitary facilities which should be kept clean and operational. Toilets should have sinks for hand washing. Toilets should be provided with separate chambers for both males and females.~~

**Argentina suggests changes on the redaction of this phrase for a better understanding.**

7.3 bis Cooking and Handling

**Food handlers must wash their hands before starting their work.**

**Argentina suggests adding a new paragraph to indicate de washing hands because is very important to the food hygiene.**

**7.4.1 bis. Food handlers must wash their hands before starting their work.**

**Argentina suggests adding a new paragraph to indicate de washing hands because is very important to the food hygiene**

7.4.1 bis. Cooked foods should ~~not be handled with bare hands.~~ **should be handled with clean utensils. The use of gloves is not recommended except in particular situations (to cover wounds, handle raw foods). Avoid the use of latex gloves in order to avoid possible allergic reactions in susceptible people.** If gloves are worn, appropriate measures should be applied to ensure the gloves do not become the source of contamination.

**Argentina suggests changes on the redaction of this phrase for a better understanding.**

**[Spanish]**

Argentina agradece al Grupo de Trabajo Electrónico presidido por Kenya y copresidido por Bolivia y Nigeria por el trabajo realizado y la oportunidad de realizar comentarios.

**Comentarios de Argentina**

8. El GTE solicita la opinión de los miembros y observadores sobre las siguientes cuestiones para su posterior consideración por el CCFH en su 54.ª reunión:

- Si se debería conservar el título actual, "Directrices para las medidas de control de la higiene de los alimentos en los mercados tradicionales de alimentos", o se debería cambiar por "Directrices para las medidas de control de la higiene en los mercados tradicionales de alimentos".

Argentina prefiere mantener el título actual: "Directrices para las medidas de control de la higiene de los alimentos en los mercados tradicionales de alimentos"

- Si este conjunto de directrices debería adoptar una estructura de directrices, una estructura de código de prácticas o la estructura única propuesta.

Argentina prefiere mantener la estructura única propuesta.

- Si la estructura y los títulos recogen todas las cuestiones clave que se deben abordar.

Argentina está de acuerdo y entiende que las cuestiones claves se encuentran abordadas.

- Si existen otras cuestiones que se debería abordar en las directrices.

Argentina entiende que no hay otras cuestiones claves a abordar

- Considerando la solicitud formulada por la CAC en su 46.º período de sesiones de examinar cuidadosamente la relación entre estas directrices y las cuatro directrices o códigos de prácticas de higiene regionales vigentes sobre los alimentos vendidos en la vía pública (es decir, CXG22R-1997, CXC43R-1995, CXC71R-2013, CXC76R-2017), si estas directrices se podrían considerar complementarias o sustitutivas de los textos existentes.

Argentina entiende que las directrices o códigos de prácticas de higiene regionales vigentes sobre los alimentos vendidos en la vía pública son complementarios a este documento.

Argentina está de acuerdo en avanzar con el desarrollo de este documento.

## Comentarios específicos

### 5.1 Estado de salud de los manipuladores de alimentos

~~5.1.1 Todos los manipuladores de alimentos de los mercados tradicionales de alimentos se deberían someter a controles de salud diarios antes de manipular alimentos, así como a un reconocimiento médico programado y, en caso necesario, estar certificados o inmunizados.~~

**Argentina sugiere eliminar el párrafo. De acuerdo con las recomendaciones de la Organización Mundial de la Salud, desde 1989, se considera que los reconocimientos o exámenes médicos del personal que manipula alimentos sólo son válidos para el momento en que se realizan, careciendo de valor para la prevención de enfermedades de transmisión alimentaria.**

**Referencia:** page 34 item 7:

[https://iris.who.int/bitstream/handle/10665/38647/WHO\\_TRS\\_785\\_spa.pdf?sequence=1&isAllowed=y](https://iris.who.int/bitstream/handle/10665/38647/WHO_TRS_785_spa.pdf?sequence=1&isAllowed=y)

### 6.5 Saneamiento

~~6.5.3 Aseos e instalaciones sanitarias – Todos los mercados tradicionales de alimentos deberían disponer de aseos otras instalaciones sanitarias de fácil acceso, que se deberían mantener limpios y en funcionamiento. **Los aseos deben tener lavabos para lavarse las manos.** Los aseos deberían disponer de cubículos separados para hombres y mujeres.~~

Argentina sugiere cambios en la redacción de esta frase para una mejor comprensión.

### 7.3 Cocción y manipulación

#### **7.3.1 bis. Los manipuladores de alimentos deben lavarse las manos antes de empezar a trabajar.**

Argentina sugiere añadir un nuevo párrafo al inicio para indicar que lavarse las manos es muy importante para la higiene alimentaria.

### 7.4 Forma de servir los alimentos

Todo manipulador de alimentos debería respetar lo siguiente:

7.4.1 Los alimentos cocinados ~~no se deberían manipular con las manos desnudas~~ **deben manipularse con utensilios limpios. No se recomienda el uso de guantes salvo en situaciones particulares (para cubrir heridas, manipular alimentos crudos). Evitar el uso de guantes de látex para evitar posibles reacciones alérgicas en personas susceptibles.**; si se utilizan guantes, se deberían aplicar las medidas adecuadas para que los guantes no se conviertan en una fuente de contaminación.

Argentina sugiere cambios en la redacción del párrafo para una mejor comprensión.

### Malaysia

Malaysia would like to thank the Electronic Working Group chaired by Kenya and co-chaired by Bolivia and Nigeria for preparing the Proposed Draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food and also appreciates the opportunity to provide comments on the draft guidelines.

With regards to the title of the guidelines, Malaysia is of the view that it should be retained as “Guidelines for Food Hygiene Control Measures in Traditional Markets for Food” as this guidelines provide guidance on the development and/or implementation of food safety measures in traditional markets.

Malaysia prefers that this set of guidelines should be adopted as a guideline structure and should be considered as complementary to the existing four regional Guidelines / Code of Hygienic Practice related to street food (e.g., CXG 22R-1997, CXC 43R-1995, CXC 71R-2013, CXC 76R-2017), and not for replacement for those existing texts.

Malaysia is of the view that the scope of this proposed draft guideline does not reflex the context of traditional markets in the previous agreed project document which targeting consumers to purchase fresh food for home preparation and street-vended prepared foods. The scope proposed which comprise both raw and ready-to-eat food are broader than the existing four regional Guidelines / Code of Hygienic Practice that cover street-vended foods for immediate consumption only.

Malaysia proposed that the definition of “traditional markets for food” should be more specific and precise, and the content of proposed draft guidelines should be in-line and not beyond what is meant by traditional markets for food. The broader coverage will create difficulties on determining which type of markets to be categorised as traditional markets.

### Republic of Korea

#### **PROPOSED DRAFT GUIDELINES FOR FOOD HYGIENE CONTROL MEASURES IN TRADITIONAL MARKETS FOR FOOD**

While both the existing and revised titles seem appropriate, The Republic of Korea agrees to retain the existing title of the guidance, “Guidelines for food hygiene control measures in traditional markets for food” to clarify the scope of the guidance and avoid confusion.

### Singapore

#### Request for comments at Step 3 on proposed draft guidelines for food hygiene control measures in traditional markets for food

Singapore thanks Kenya, Bolivia and Nigeria for preparing the proposed draft guidelines, taking into consideration comments submitted in the eWG.

Singapore generally agrees with most parts of the proposed draft guidelines for Food Hygiene Control Measures in Traditional Markets for Food with some specific comments as follows:

#### Specific Comments to Agenda 8 CX/FH 24/54/9 Appendix I:

1. Singapore proposes to include the underlined words “trained and” and “as appropriate” in Para 5.5.3 and 6.5.3, respectively.

*Paragraph 5.5.3:* Ensuring personnel are trained and competent as appropriate to their job activities.

*Paragraph 6.5.3:* Toilets and sanitary facilities –Every traditional market for food should have easily accessible toilets and other sanitary facilities which should be kept clean and operational. Toilets should be provided with separate chambers for both males and females, as appropriate.

2. Singapore proposes to include the underlined words as examples to be consistent with WHO's Five Keys for Safer Traditional Food Markets.

*Paragraph 5.2.1: Wear clean and appropriate personal protective equipment (PPE), such as mask, apron and gloves, where necessary*

*Reference: <Five Keys for Safer Traditional Food Markets, WHO>*

*Key 1: Keep clean*

**12. PERSONAL HYGIENE PRACTICES**

✓ *Wash hands with soap and water, or apply alcohol-based handrub products (see Annex 4, 5 and 6)*

✓ *Do it before handling food, after using the toilet, after handling raw food and after touching money.*

✓ *Wear proper personal protective equipment such as a mask, apron and gloves, where necessary*

3. Singapore proposes to include the words "during segregation" and "during transportation to avoid food contamination" to ensure clarity and emphasis that the intention is to prevent the transportation of any materials that may contaminate the food along with the prepared/cooked food. The revised sentence will read as "Prepared/cooked food should be segregated from other materials during transportation to avoid food contamination".

*Paragraph 7.6.5: Prepared/cooked food should ~~not~~ be segregated from ~~transported together with raw food, ingredients, and any~~ other materials during transportation to avoid food contamination ~~which may contaminate the food.~~*

## Rwanda

Rwanda supports to change the title to "Guidelines for hygiene control measures in traditional markets for food"

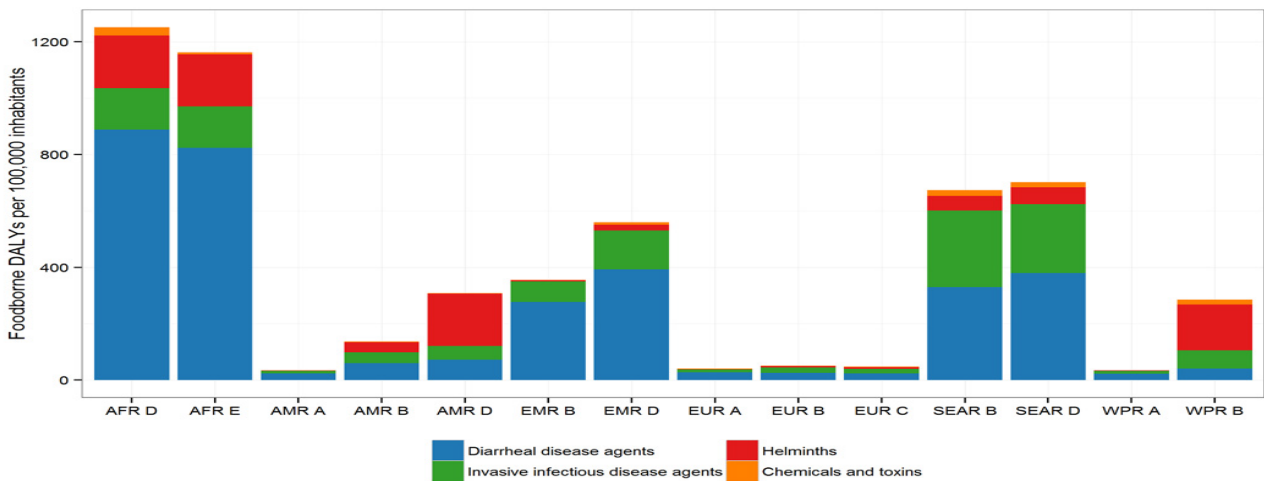
Rationale: The hygienic controls may not necessarily on food. Better to keep it general

## GAIN

### IMPORTANT BACKGROUND

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 8) at the upcoming Codex Committee for Food Hygiene (CCFH) meeting in Nairobi, Kenya. 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. We have 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, with 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.

The Codex Alimentarius' mission is to protect the health of consumers, as well as fair practices in food trade. GAIN was pleased that the CCFH accepted work to address hygiene conditions in traditional markets for food, as those markets are vital to protect the health of consumers. 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. 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 could improve the uptake of nutrients that contributes to physical and intellectual health, especially for young children.

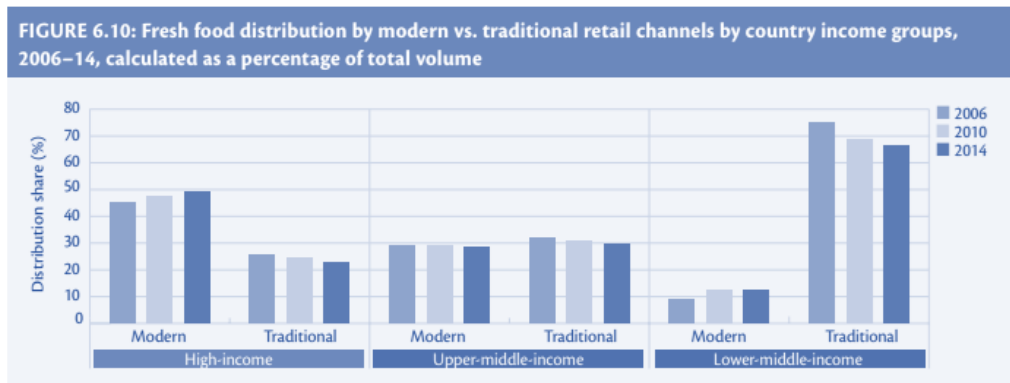


Regions: **Africa (AFR)**; Americas (AMR); Eastern Mediterranean (EMR); European (EUR); **South-East Asian (SEAR)**; Western Pacific (WPR).

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](#).

In LMICs the informal food retail sector is often overlooked by governments, so the Codex Guidelines for Food Hygiene Control Measures in Traditional Markets for Food will provide an important tool to address this gap. Each day, millions of people buy food from traditional markets for food. Those markets facilitate availability and access to nutritious foods, like meat, poultry, fish, fruits, vegetables, and grains – especially for the consumers most vulnerable to malnutrition, like poor urban residents. The markets also support livelihoods and nurture the social fabric of communities. Market vendors and consumers tend to have close, routine relationships around the sale of food as well as sharing of information about food supply.

Traditional markets for food are vitally important for consumers



GloPlan 2016 (Global Panel on Agriculture and Food Systems for Nutrition)

**COMMENT BY GAIN**

GAIN would like to register its strong support for the draft “Guidelines for food hygiene control measures in traditional markets for food”, as proposed by Kenya, Nigeria and Bolivia, and urge its advancement to Step 5/8 as early as possible. Given how important traditional markets are to consumers in many regions, and the critical need to address the burden of disease in many regions, it is vital 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 consumers’ exposure to food safety risks within traditional markets. In short, addressing food safety in traditional markets is vital to reduce the global burden of foodborne disease.

The proposal is well grounded in existing Codex text and the review process has been transparent and thorough. Countries from every global region have had the opportunity to review the text and make suggestions. We observed that comments were well received and thoughtfully addressed by the Chair and Co-chairs.

Below GAIN has addressed the questions posed by the Circular letter:

- *Whether the title should be retained as “Guidelines for food hygiene control measures in traditional markets for food” or changed to “Guidelines for hygiene control measures in traditional markets for food”*

GAIN could support either title, including the new proposed title “Guidelines for hygiene control measures in traditional markets for food”

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

GAIN agrees with Australia, which supports the proposed unique structure developed by the Chairs. We are particularly concerned that the issue of form should not supersede the issue of content, as it could unnecessarily delay adoption of this Guidance.

- *Whether the structure and headings capture all the key issues to be addressed;*

GAIN agrees that the structure and headings capture all the key issues to be addressed.

- *Whether there are any other issues to be covered by the guidelines;*

GAIN did not identify other issues to be covered by the guidelines.

- *Considering the request of CAC46 to carefully consider the relationship between these guidelines and the existing four regional Guidelines/Codes of Hygienic Practice related to street food (e.g., CXG 22R-1997, CXC 43R-1995, CXC 71R-2013, CXC 76R-2017), whether these guidelines might be considered as complementary to or replacement for those existing texts.*

GAIN supports the position of the EU and others that believe it is the responsibility of the regional committees to consider if revision or deletion of the regional Guidelines or Codes of Practice is warranted once the Guidelines covering traditional markets have been adopted.

In closing, GAIN would like to remind delegates of the words of the former Chair of the Codex Committee for Food Hygiene, Dr. Karen Hulabek, who regularly cautioned that Codex should not let “the perfect be the enemy of the good.” The current proposed Guidance would serve the countries well and moving it to Step 5/8 would make the information available to all nations rapidly.

The Committee benefitted from the work done in four regions to address issues with street vended food, which helped advance the text rapidly. The new text is based on a solid foundation derived from multiple regions and the advice of the Electronic Working Group. Kenya, Nigeria and Bolivia have done an excellent job in providing the proposed Draft of the Guidelines for traditional markets for food and we hope to see the document progress to Step 5/8 as quickly as possible.