



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

Comments of Ghana

Agenda Item 5.1: 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): Proposed draft Annex II on Fresh Leafy Vegetables

Position 1: Ghana supports the adoption of the Annex at 5/8 and recommends that 'cooked' is added to the definition of Fresh Leafy Vegetables for the sentence to read 'Vegetables of a leafy nature where the leaf is intended for consumption raw/cooked'

Rational 1: This is to make provision for colocasia leaves which require cooking before consumption

Position 2: The cooling step in figure1 should be deleted and merged with transporting for the step to read 'Transportation Under Cold Conditions

Rational 2: This would enable effective control of STEC during transportation.

Agenda Item 5.2: 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: Proposed draft Annex IV on Sprouts

Position: Ghana supports the advancement of the Annex with the addition of the following comments to Paragraph 80 as follows: For in-restaurant sprouting, interventions recommended for sprout operations to minimize the potential for STEC should be considered, including seed sourcing programs, seed treatment (if appropriate), prevention of cross-contamination, sampling, and testing of spent sprout irrigation water (samples to be tested by **contracted competent** laboratories), as well as cleaning and disinfecting food contact surfaces.

Agenda Item 6: Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (Annexes on water re-use in fish and fishery products (renamed from Fishery products) and on the production of milk and milk products (renamed from Dairy Products)

Position: Ghana agrees to the advancement of the Annexes and recommends final adoption at step 5/8 by CAC47.

Agenda Item 7: Proposed draft revision on the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood (CXG 73-2010) at Step 4

Position: Ghana supports the advancement of the proposed draft revision on the Guidelines in the Codex standard stepwise process

Agenda Item8: Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food at Step 4

Issue 1: Whether the title should be retained as "Guidelines for food hygiene control measures in traditional markets for food" or change to 'Guidelines for hygiene control measures in traditional markets for food'

Position 1: Ghana supports the original title “Guidelines for food hygiene control measures in traditional markets for food” since it is in alignment with the principles and standards outlined in the Code of Practice CXC 1-1969

Issue 2: Whether this set of guidelines should adopt a guidelines structure, CoP structure, or the proposed unique structure;`

Position 2: Ghana proposes that the guidelines should adopt a guideline structure in order to reinforce the document’s intent and utility as a guiding document

Issue 3: Section 5 – Food Business Operators, Health Status of food handlers

Position 3: Replace ‘daily with regular for the sentence in para 5.1.1 to read ‘All food handlers in traditional markets for food should undergo **daily regular** health checks before handling food as well as a scheduled medical examination and, where necessary be certified and /or immunized’. This is due to the difficulty in undergoing a daily health checks for traditional market staff.

Position 4: Re-write para 7.5.2 to be in line with para 7.5.1 to read as follows ‘All unsold cooked/prepared food and prepared beverages that cannot be properly preserved should be safely disposed of at the end of the day’.

Agenda Item 9: Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (CXC 1-1969)

Position: Ghana supports new work to align Codex texts, as developed by the Codex Committee on Food Hygiene (CCFH), with the updated General Principles of Food Hygiene (CXC 1-1969) and further agrees with the following recommendations:

- The work is prioritized, divided, and integrated into the future work plan.
- A standing working group is created to consider how the alignment of existing texts should be prioritized, how work can be divided, and to work with the Chairperson of the EWG on the forward work plan to update the future work plan.

Considering the long-term benefits of clarity, consistency, and applicability in Codex food hygiene texts, Ghana recommends option 3. Despite its greater initial investment in terms of time and resources, this option offers the most comprehensive solution to the current misalignments and inconsistencies with the revised CXC 1-1969. By fully integrating structural and technical updates, Option 3 not only addresses current discrepancies but also positions the Codex texts for easier updates and alignments in the future, thus providing a more sustainable solution. Moreover, ensuring that all references and definitions are in line with the latest food hygiene principles will enhance global food safety standards, benefiting food business operators and consumers alike.

Agenda Item10: Revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012)

Position: Ghana supports the revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food (CXG 79-2012). There is the need to safeguard public health against the risks posed by foodborne viruses, which have become increasingly prominent. The incorporation of recent scientific developments in virus detection and risk assessment into the guidelines will empower Codex members to strengthen their national food safety systems.

Agenda Item11: Discussion paper on the Revision of Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011)

Ghana supports the new work proposal to revise the Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011), and recommends that CCFH54 forwards this proposal to CAC47(2024) for approval.

The proposed revisions are timely and necessary to reflect the evolving landscape of food safety, particularly in light of the increased understanding of pathogen behavior and control mechanisms. This will also help in controlling and reducing the incidence of foodborne illnesses and enhance trade opportunities by ensuring compliance with international food safety standards.

Agenda Item12: Discussion paper on the revision of Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007)

Position: Ghana supports the new work proposal to revise the Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods (CXG 61-2007) and recommends that CCFH54 forwards this proposal to CAC47(2024) for approval. Ghana supports this work due to the significant public health implications of *Listeria monocytogenes* in foods, particularly in ready-to-eat products. Updating the guidelines to include the latest scientific findings and risk assessment methodologies will enhance food safety, protect consumer health, and support the continent's agricultural and trade.