

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

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Agenda Item 4

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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DRAFT CODE OF HYGIENIC PRACTICE FOR TRANSPORT OF FOODSTUFFS IN BULK AND SEMI-PACKED FOODSTUFFS (Document prepared by the Netherlands)

GOVERNMENT COMMENTS AT STEP 6

GENERAL COMMENTS

INDIA

The Draft Code should, with modifications, be made applicable only for processed fruits and vegetables. All the conditions need not necessarily be mandatory for fresh fruits and vegetables because of the unorganized nature of business in the developing countries.

UNITED STATES OF AMERICA

Since this Code is to be used in combination with the *Recommended International Code of Practice: General Principles of Food Hygiene*, it should be formatted and written to maintain a direct parallel between the related provisions of the two documents.

INTRODUCTION

Nigeria agrees that food manufacturers or receivers are responsible for communicating to transporters specific food safety control procedures required during transportation to ensure product safety and suitability for consumption upon delivery.

SECTION 1. OBJECTIVES

UNITED STATES OF AMERICA

In the first bullet point, first line, change “applicable” to “supplemental”

SECTION 2. SCOPE, USE AND DEFINITIONS

UNITED STATES OF AMERICA

In order to be consistent with the *Recommended International Code of Hygienic Practice: General Principles of Food Hygiene*, Scope, Use, and Definitions should be presented in separate sub-sections as follows:

2.1 SCOPE

This code of practice covers the conditions of the food transportation unit, loading, transport, in-transit storage and unloading of bulk and semi-packed foodstuffs.

2.2 USE

The code's provisions are to be applied in addition to all applicable provisions of the *Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1-1969, Rev. 3, 1997) including Section VIII that specifically addresses transportation.

2.2 DEFINITIONS

Renumber this sub section to "2.3" and the current wording of this sub-section should be modified as follows:

To be consistent with the *Recommended International Code of Practice: General Principles of Food Hygiene*, begin this section, "For the purpose of this Code, the following expressions have the meaning stated." Then delete the words "means" and "includes" at the beginning of each definition and further revise as indicated below.

Foodstuff: revise to read follows: "Primary (fresh commodities/raw materials), intermediary (partially processed - including food additives), as well as finished processed products intended or suitable for human consumption. Such products may be fresh, frozen, dried, powdered, granulated, dehydrated, or liquid, e.g., fresh produce, oil, liquid or dry eggs, liquid or granulated sugar, potato flakes."

Food transportation unit: revise to read: "Food transportation vehicles (aircraft, railcars, trucks and trailers, and ships and barges), transport receptacles (bins, boxes, bulk tanks, containers, totes) on such vehicles, and any other food transport receptacle that may come in contact with food during transport. The term does not include a new single-use food container filled at a food-processing establishment and discarded after one use. The term also does not include a multi-use food container that is returned for cleaning and refilling in a food processing establishment."

(Note: It is not our intent to have this Codex Bulk Food Transportation Code address in-plant operations that are covered under the General Principles document, e.g., cleaning and refilling returnable five-gallon (18+ liter) food or beverage containers.)

Bulk: revise to read : "Unpacked foodstuff in direct contact with any surface of the food transportation unit or the atmosphere. "

3. PRIMARY PRODUCTION

INDIA

Second paragraph, since the farmers in developing countries are poor, unorganized and have small holdings, transportation of primary produce is done by traditional means, for example, head-loads, bullock carts, animals. In India, not more than 4 to 5% of the total horticultural produce is done through better organized cooperatives. In view of the limited transport facility available with the farmers, implementation of para 3.2 is not feasible.

Because of diversity of seasons, the farmer produces different kinds of perishable produce during the year. It is not possible for farmers of developing countries to have transport units of different designs catering to different products.

UNITED STATES OF AMERICA

Revise this section to read as follows:

The provisions of the *Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1 - 1969, Rev. 3, 1997) shall be applied.

Food transportation units represent a potential source of food contamination at the point of primary production on farms and ranches and in orchards and vineyards.

Field crops and fresh produce, particularly those that may be consumed with little or no processing, should not be transported in food transportation units used to haul animals, manure, pesticides, petroleum products (such as containers of fuel and lubricants for equipment), fertilizers, or other materials that may contaminate those foods. If the same food transportation unit must be used, it should be thoroughly cleaned and disinfected or sanitized before reuse with food.

Furthermore, certain agricultural commodities pose increased risks of contamination of the food transportation units that may result in subsequent cross contamination of foods hauled in such units. Field crops and fresh produce transported directly from growing areas prior to cleaning or processing are of concern because these commodities may bear soil and contaminants associated with the use of pesticides, raw sewage, animal manure or other substances applied to the land or crops prior to harvesting. Food transportation units conveying such products require increased attention to cleaning and disinfecting or sanitizing between loads.

4. ESTABLISHMENT: DESIGN AND FACILITIES

INDIA

Paragraph four, para 4.5 cannot be practically feasible for perishables in the developing countries.

NIGERIA

Nigeria suggests that there should be an additional paragraph, 4.9 (paragraph 9), that should read:

“Food transportation units should be used solely for the transportation of foodstuffs and no other product.”

UNITED STATES OF AMERICA

First paragraph, second sentence - revise to read as follows: "Important aspects include appropriate coatings or wood treatments, and cleanability."

Third paragraph. The Codex Committee on Fats and Oils arrived at consensus wording on the use of thermal heating fluids in regard to the *Code of Practice for the Transport of Fats and Oils in Bulk* (ALINORM 99/17, paragraph 11 and Appendix V). With respect to thermal heating fluids, to provide consistency within Codex on the thermal heating fluid area, we would recommend the use of the CCFO wording in this document. The second sentence of this paragraph should be revised to read as follows: “With respect to the use of thermal heating fluids, although hot water and steam are the preferred means of heating, other substances may be used on the basis of safety and risk evaluation and inspection procedures. Upon request by competent authorities, evidence may be required to demonstrate that the heating media employed have been properly evaluated and safely used.”

Fourth paragraph,

- first sentence: for internal document consistency change "Inner surfaces" to "Interior surfaces."

- second sentence: revise to read as follows: "These should be non-toxic, inert, or at least compatible with the transported foodstuff, and should not adversely affect the foodstuff or pose a significant health risk."

- last sentence: change, "areas" to "surfaces".

Fifth paragraph: revise as follows, "The food transportation unit should be designed to provide effective protection against vermin such as insects and rodents, and contamination from the environment such as dust, dirt, rain, and snow. When necessary, the unit should be appropriately insulated against loss or gain of heat, should be equipped with cooling or heating capacity sufficient for maintaining product temperatures, and constructed to facilitate locking or sealing."

Sixth paragraph: revise in part to read as follows, "... and, where appropriate, disinfecting and fumigation of the..."

Seventh paragraph: revise in part to read as follows, "Auxiliary equipment such as pipes, hoses, pumps, and filters should be..."

Add a new ninth paragraph as follows, "Full or partial enclosures, overhead protection, individual hatch protection, or other protections should be provided to prevent contamination of foodstuffs and interior surfaces of the food transportation unit during loading and unloading."

5.1 IDENTIFICATION OF POTENTIAL HAZARD

INDIA

HACCP required under para 5.1 cannot be applied to small and poor farmers in the developing countries. Moreover, sufficient flexibility is required to be made available to the developing countries to implement HACCP.

UNITED STATES OF AMERICA

Revise to read as follows: "It may be useful to refer to the listed questions (see Table 1) to identify hazards that may arise during transport of bulk and semi-packed foodstuffs. If any such hazards are identified, appropriate control measures should be implemented. Reference is made to the HACCP system for ensuring the safety of food (Annex to CAC/RCP, Rev.3 - 1997)."

5.1.1 RECORDS OF PRIOR CARGOES AND PRIOR CLEANING

NIGERIA

Nigeria agrees that records to be maintained and kept readily should be three of the most recent prior cargoes.

UNITED STATES OF AMERICA

Delete this item combining its contents with item 5.3 as proposed below. This "records" requirement is out of place here as it interrupts the flow of the "hazard identification" discussion. This deletion will require the renumbering of Section 5 items.

5.2.1 HAZARDS RELATED TO THE FOOD TRANSPORTATION UNIT

UNITED STATES OF AMERICA

Revise first sentence in part to read as follows: "...residues of previous cargoes or cleaning and disinfecting or sanitizing materials including odors that can permeate foodstuffs."

Delete the last sentence. This issue is covered below under item 5.4 Dedicated transport.

5.2.2 HAZARDS RELATED TO LOADING AND UNLOADING

UNITED STATES OF AMERICA

Revise second sentence to read as follows: ",undesirable introduction of vermin, microbes, moisture, dust, or other physical or chemical contaminants."

5.2.3 HAZARDS RELATED TO TRANSPORT

UNITED STATES OF AMERICA

Revise to read as follows: "Cross contamination from concurrent cargoes, spillage, breakage, or leakage (including heating/cooling fluids). A breakdown in temperature control. A grow out of insect eggs and insects. Tampering by unauthorized persons."

5.3 COMMUNICATION AND DOCUMENTATION OF CONTROLS DURING TRANSPORT

INDIA

The Draft Code takes into account, availability of companies doing business in logistics support. Such businesses are lacking in most of the developing countries. Therefore, communication and documentation of controls during the transportation cannot be implemented in case of developing countries. Earlier also, India had not supported introduction of these requirements.

UNITED STATES OF AMERICA

Revise to read as follows:

5.3.1 Development and communication of controls

Shippers or receivers should formulate suitable controls to ensure food safety during transport (see questions in Table 1). Such controls should be communicated in writing. This documentation is an important tool for validation and verification of adherence to the General Principles of Food Hygiene.

5.3.2 Transporter Records

The transporter should maintain records pertaining to the food transportation unit describing the three most recent prior cargoes and the cleaning (fumigation) methods (if any) employed. This documentation may include the food transportation unit number, registration of previous loads, load-out date, listing of tamper evident seal numbers, temperature-time recordings and cleaning certificates. These records should be readily available at the food transportation unit or as prescribed by the official agency having jurisdiction. These records should be made available as appropriate to the food shipper, food receiver, and the official agency having jurisdiction.

(Note: the reference in the last sentence of the original language to "single-use" food transportation units is omitted since this concept is covered under item 5.4 Dedicated Transport below.)

5.4 DEDICATED TRANSPORT

NIGERIA

Nigeria considers it necessary to emphasize that perishable products (e.g. Frozen fish) require transport dedicated to that group of product.

UNITED STATES OF AMERICA

Revise to read as follows:

5.4.1 Justification

Dedicated transportation of single commodities can be very expensive and is appropriately employed where it is justified by significantly reducing food safety risks or by addressing specific quality assurance needs.

Current food transportation practices in many countries allow "food grade" substances and other materials posing no significant risks to be transported in the same containers used for the carriage of bulk foods, provided that adequate cleaning methods are employed. Examples of materials that are acceptable prior cargoes to foods include acetic acid, glycerin, fatty acid alcohols, and ammonium hydroxide.

Where justified, the dedicated carriage of individual foodstuffs may be required and should be determined by the shippers and receivers of such foodstuffs and specified in contractual agreements.

5.4.2 Conformance with General Principles

The use of a dedicated food transportation unit does not exempt a transporter from conforming to the provisions of this Code and the *Recommended International Code of Practice: General Principles of Food Hygiene*.

6. ESTABLISHMENT: MAINTENANCE AND SANITATION

NIGERIA

Nigeria suggests that the appropriate types of disinfection suitable or safe for use as regards foodstuffs should be included in this text.

UNITED STATES OF AMERICA

Revise to read as follows:

6.1 Interior surfaces

Interior surfaces of food transportation units for direct food contact should be maintained in good repair with no evidence of excessive corrosion, flaking, chipping, or loose coating/lining material.

6.2 Accessories and connections

A food transportation unit's accessories and connections should be cleaned, disinfected or sanitized (where appropriate), and maintained to reduce the risk of contamination. Depending upon the nature of the commodity or food being transported, various cleaning procedures may be necessary.

6.3 Rinsing, if required, and draining should follow disinfection or sanitization.

(Note: The issue of rinsing is now covered by the new (adopted by the CAC at its 23rd Session) Section 6.1.2 to the *Recommended International Code of Practice: General Principles of Food Hygiene*. Specifically it states, "Where necessary, disinfection with subsequent rinsing unless manufacturers' instructions indicate on a scientific basis that rinsing is not required.")

6.4 Treated wood surfaces

Where water is used to clean treated wood surfaces, those surfaces should be allowed to dry before loading foodstuffs.

7 ESTABLISHMENT: PERSONAL HYGIENE

UNITED STATES OF AMERICA

Revise to read as follows:

The provisions of the *Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1 - 1969, Rev. 3, 1997), Section VII, addresses personal hygiene issues including employee health, personal cleanliness, and good public health practices. This Section should be applied with respect to all food transportation unit personnel in contact with bulk or semi-packed foodstuffs.

Insert the following

8 TRANSPORTATION

The provisions of this Code are supplementary to the *Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1 - 1969, Rev. 3, 1997), Section VIII Transportation, and should be applied together with it.

9 PRODUCT INFORMATION AND CONSUMER AWARENESS

The provisions of the *Recommended International Code of Practice: General Principles of Food Hygiene* (CAC/RCP 1 - 1969, Rev. 3, 1997), Section IX Product Information and Consumer Awareness, should be applied to food transportation issues to the extent they become relevant.

8 TRAINING

NIGERIA

Nigeria appreciates the importance of training of personnel on proper hygienic practices and would be willing to be involved in collaborative training programs with Codex, FAO, WHO, WTO or any other international body.

UNITED STATES OF AMERICA

Renumber the section to “**10**” and revise to read as follows:

10.1 Food safety principles

It is important that those food industry and transportation personnel who are responsible for designing, implementing, and monitoring programs for ensuring the safe transport of foodstuffs understand the principles of food safety. They should understand these principles as they relate to the characteristics of the food transportation industry and the nature of the specific foodstuffs being transported.

10.2 Inspection procedures

Industry and regulatory personnel should understand food transportation unit-inspection procedures pertaining to food safety including visual, olfactory, and other appropriate testing methods.