

# codex alimentarius commission

FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD HEALTH  
ORGANIZATION

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**Agenda Item 6**

**CX/FH 99/6 Add.1**

**October, 1999**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON FOOD HYGIENE**

#### **Thirty-second Session**

**Washington, DC, November 29 – December 4, 1999**

### **PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR THE PRIMARY PRODUCTION, HARVESTING AND PACKAGING OF FRESH FRUITS AND PRODUCE AT STEP 3**

Following countries, Brazil, Costa Rica, Denmark, Finland, India, Peru, Spain, United Kingdom, and The United States of America submitted comments in response to the document CX/FH 99/6.

#### **GENERAL COMMENTS**

##### **BRAZIL**

The document should be redrafted. We consider that the way it is presented, there is not a clear and explicit practicability of this code.

This issue of draft document is of great interest and necessity, but also it needs a better discussion and evaluation. We consider necessary to include fungi and algae production.

##### **COSTA RICA**

We suggest changing the verb tense in which the document is currently written, that is: change debería [should] to debe [should], because when these documents are adopted by our country with the term debería [should], we must transcribe the entire document in order to change the verb tense.

##### **DENMARK**

Referring to earlier discussions Denmark finds that it should be considered to include an annex concerning the production of sprouts to the text.

##### **FINLAND**

Because of the problems and outbreaks associated with sprouts, Finland recommends that either there should be a section or annex dealing with sprouts in this Code or a special Code of Hygiene Practice for Sprouts should be drafted.

##### **INDIA**

India is the one of the largest producers of fresh fruits and vegetables in the world and hence occupies a key position in the global production scenario. India is also a large developing country with diverse agro climatic conditions meaning thereby that fruits and vegetables and other crops are grown over a large area

and under different climatic conditions during different parts of the year. 70% of the population lives in rural areas and have an average land holding of less than 1 hectare. This is primarily because Indian agriculture is dominated by small farmers who produce for their own consumption. Any surplus production is sold outside, either directly to the nearby villages or to distant markets through intermediaries. Therefore, production of fruits and vegetables has always been managed in a traditional manner. India's comments on the draft code, therefore, are as follows:

- The proposal appears to have watertight compartments enabling production under protective environment. This kind of production is not feasible in the developing countries where farmers have small holdings. Even some of the developed countries find it difficult to follow such harsh conditions.
- The suggested requirements need a sufficiently high level of infrastructure, education and training of the farmers over a long period in the developing countries. Moreover, these will not be cost effective either for the farmer or for sale outside the farm. Most of the consumers will not be able to afford fresh fruits and vegetables at high costs.
- The Code of Hygienic Practices for Primary production should be consistent with the Agreement on Sanitary and Phytosanitary measures and should not be an unnecessary technical barrier to trade.
- Application of stringent hygienic practices for smallholdings, suggested by this proposal, for testing of inputs like soil, water, manure, etc is impractical in the developing countries for the basic reason that neither the developing countries have the infrastructure, nor trained manpower to such a large extent.
- In the 31<sup>st</sup> Session of the CCFH, the Indian delegation supported by many other countries stated that application of HACCP in primary production especially in developing countries is extremely difficult. The Indian delegation submitted its written comments to the Codex Secretariat asking for incorporation of adequate flexibility to be provided to the developing countries. The proposed Code does not appear to have taken these suggestions in account. The objective of India's suggestions was that the developing countries cannot be expected to come up to the levels of expertise proposed in the draft Code. In our view, it would be more appropriate to improve the hygienic practices in a gradual and phased manner to allow sufficient time to the developing countries.
- India would like to suggest that the Draft Code of Hygienic Practices may support improvements in post harvest technology to avoid contamination in the produce before suggesting hygienic practices at the farm level. This would help the developing countries. This appears to be missing from the Draft Code.

In view of the above, Government of India opposes the proposed Draft Code in its present form.

#### **PERU**

From the revision and analysis of the document, in general it seems like a good proposal and it will be useful in initiating your discussion at the Codex Committee for Food Hygiene and it complements the General Principles of Food Hygiene very well. However, the Spanish version has some form deficiencies and some words with meanings that do not correspond with the text.

#### **SPAIN**

In the version in Spanish in the title and context of the standard, the expressions: "cosecha" [harvest] and "empacado" [packaging] should be changed to "recolección" [harvest] and "envasado" [packing].

The decisory character of the Code should agree in the English, Spanish and French versions, since in Spanish the expression "Deberían" [should be] is used, in French: "Doivent" [should be] and in English: "Should be".

We are proponents of the use of the present or future tense (deben [should be] or deberán [shall be]) and not the conditional (deberían [should be]).

#### **UNITED STATES OF AMERICA**

The United States would like to express its thanks to the Delegation of Canada and its drafting partners for the work they have done on developing the document from the outline presented at the 31<sup>st</sup> Session of the Committee. The Drafting Group is to be commended for preparing a well developed and technically complete Proposed Draft Code.

Because of the close relationship between fresh whole produce and “pre-cut” fruit and vegetables, it may be most effective to closely coordinate the development of the two CCFH Codes of Hygienic Practice dealing with these products. This coordination will ensure that all appropriate aspects of hygienic practices for the two groups of products are adequately covered. This coordination should not, however, impede progress of one Code or the other.

### **COMMENTS ON THE SPECIFIC SECTIONS OF THE CODE**

#### **TITLE**

##### **SPAIN**

We propose changing the title of the draft to the following: “Anteproyecto de Código de Prácticas de Higiene para el cultivo, la recolección y el envasado de las frutas y hortalizas frescas” [“Draft Code of Hygienic Practice for the Growing, Harvesting and Packaging of Fresh Fruits and Vegetables”].

#### **SECTION 1 OBJECTIVES**

##### **BRAZIL**

The main objective is the production of fresh fruits and vegetables safe for use and/or consumption.

##### **UNITED STATES OF AMERICA**

The terms GAPs and GMPs should be inserted in parenthesis after the terms “good agricultural practices” and “good manufacturing practices” respectively and the terms used as appropriate throughout the document.

To clarify the scope of the Code, in the first sentence of this section replace the phrase “harvesting to packing” with “primary production through harvesting and packing.”

#### **SECTION 2 1 SCOPE**

##### **BRAZIL**

This code is related with GAP and GMP, but it should remark the use of HACCP principles at this step of production. It may include risk assessment.

##### **SPAIN**

We propose substituting the following for the second and third sentences of the first paragraph: “Specifically, this proposed code is applicable to fresh fruits and vegetables grown in open air or in protected facilities. It concentrates on microbiological hazards and addresses physical and chemical hazards only when they are related to good agricultural practices and good handling practices”.

In the second paragraph, the first sentence should be changed to the following:

The code does not provide recommendations for handling practices to maintain the safety of fresh fruits and vegetables at retail, in food services (bars, restaurants, cantinas and other similar activities) or in the home.

## **SECTION 2.2 USE**

### **BRAZIL**

May be added CAC documents about Risk Analysis and Criteria for microbiological analysis. This discussion should be amplified, including the meaning of "contaminants of concern", considering also control of natural presence of microorganisms and the products that "will receive little or no post-harvest treatment". Perhaps it will be useful to have Annex considering water requirements and treatments, including manure, sewage and other natural fertilizers at primary production level.

### **SPAIN**

In the third line the expression: "This Code focuses upon hygienic issues that are specific to the primary production, harvesting and packing of fresh fruits and vegetables" should be changed to: "This Code refers to the hygienic problems specific to the primary production, harvesting and packing of fresh fruits and vegetables."

## **SECTION 2.3 DEFINITIONS**

### **COSTA RICA**

*Fresh fruits and vegetables* – the text in parentheses should be removed (for example: raw) since it may lead to error.

It would be a good idea to define the term "minimal processing". In our case, this is understood as, for example, fruit juices prepared in front of the consumer and provided for immediate consumption (without having any additives or packaging that promotes long life), palmetto hearts which are peeled and cut, etc.

### **DENMARK**

Clean water should be defined as "water that does not contain pathogenic microorganisms". The sentence in square brackets should be deleted.

### **SPAIN**

Since we are in agreement with the definition of clean water, we propose removing the brackets.

In order to improve the definitions in the version in Spanish, we propose changing the definitions that appear in the section to the following:

Potable water - "agua que cumple con las normas de calidad del agua para beber descritas en las Guías de Calidad del Agua para Beber de la OMS" [water which meets the quality standards of drinking water such as described in the WHO Guidelines for Drinking Water Quality].

"Recolector"[Harvester] – "la persona responsable de la dirección de la recolección de frutas y hortalizas frescas" [the person responsible for the management of the harvesting of fresh fruits and vegetables].

"Mantillo" [Compost]– "Abono resultante del proceso controlado de digestión de las materias orgánicas por microorganismos aerobios y anaerobios" [Manure that results from the controlled process of digestion of organic materials by aerobic and anaerobic microorganisms].

Hazardous Compound– "todo compuesto químico susceptible de causar un efecto adverso a la salud" [any chemical compound which has the potential to cause adverse health effects].

- “Envasador” [Packer] - la persona responsable de la dirección del tratamiento postrecolección y envasado de frutas y hortalizas frescas [the person responsible for the management of post-harvest processing and packing of fresh fruits and vegetables].
- “Local de envasado” [Packing establishment] – “cualquier establecimiento cubierto en el que las frutas y hortalizas frescas reciben un tratamiento postrecolección y se envasan” [any indoor establishment in which fresh fruits and vegetables receive post-harvest treatment and are packaged].
- “Envasar” [Packing] – “la acción de colocar frutas y hortalizas frescas en un envase. Esta etapa puede realizarse en el campo o en un local de envasado” [the action of putting fresh fruits and vegetables in a package. This may take place in a field or in an establishment].
- Farm- “cualquier predio, local o terreno en el que se cultiven y recolecten frutas y hortalizas frescas, así como las áreas circundantes que estén bajo el control de la misma dirección.” [any premise or establishment in which fresh fruits and vegetables are grown and harvested and the surroundings under the control of the same management].
- Fresh Fruits and Vegetables- “productos que normalmente se venden al consumidor en su estado natural o con un tratamiento mínimo, destinados a ser consumidos crudos” [produce that are likely to be sold to consumers in an unprocessed or minimally processed (i.e. raw) form and are intended to be consumed raw].
- “Cultivo Hidropónico” [Hydroponics] - “término general que se refiere a la producción de plantas sin suelo en un medio acuoso” [a general term for the production of plants without soil in a water medium].
- Agricultural inputs- “cualquier material (tales como semillas, fertilizantes, agua, agroquímicos y soportes de plantas) utilizado para la producción primaria de frutas y hortalizas frescas” [any incoming material (e.g. seeds, fertilizers, water, agricultural chemicals, plant support, etc.) used for the primary production of fresh fruits and vegetables].
- Microorganisms – “incluye levaduras, hongos, bacterias, virus y parásitos. Ocasionalmente el término “microbiano” es utilizado para referirse a los microorganismos” [include yeasts, molds, bacteria, viruses and parasites. When used as an adjective, the term “microbial” is used].
- Microbial hazards - “microorganismos susceptibles de causar un efecto adverso a la salud” [microorganisms that have the potential to cause an adverse health effect].
- Primary Production – “fases del cultivo de frutas y hortalizas frescas tales como la siembra, plantación, irrigación, aplicación de fertilizantes o agroquímicos y la recolección” [those steps involved in the growing of fresh fruits and vegetables before harvesting such as planting, irrigation, application of fertilizers, application of agricultural chemicals, etc].
- “Productor” [Grower] – “la persona responsable de la dirección del cultivo de frutas y hortalizas frescas” [the person responsible for the management of the primary production of fresh fruits and vegetables].
- Agricultural worker – “cualquier persona que cultiva y recolecta frutas y hortalizas frescas” [any person that undertakes cultivation and harvesting of fresh fruits and vegetables].

#### UNITED KINGDOM

The definition of “primary production” in the Code differs from that contained in the Codex Recommended International Code of Practice - General Principles of Food Hygiene – CAC/RCP1 –1969, Rev 3 (1997), on which the draft is based. Harvesting is included in the definition of primary production in the General Principles Code, however, it is not included as part of primary production in the definition

in the draft fruit and vegetable Code. The definition should be aligned with that contained in the General Principles document. As a consequence, it would be desirable to remove “harvesting” from the title of the draft Code, or alternatively refer to harvesting in such a way that is consistent with the revised definition. The same applies to the title of Section 3.

#### UNITED STATES OF AMERICA

*Agricultural worker.* Change “cultivation and harvesting” to “cultivation and/or harvesting” to more appropriately broaden the definition.

*Clean Water.* We would suggest inserting “or chemical contaminants” after microorganisms to ensure that both chemical and microbiological hazards are incorporated into the definition. We would also suggest removing the brackets around the phrase “at levels that compromise food safety. Thus, the revised definition would read: “*Clean water-* water that does not contain pathogenic microorganisms or chemicals at levels that compromise food safety.’

*Farm.* Change “fresh fruits and vegetables” to “fresh fruits and/or vegetables” to more appropriately reflect farming practices.

*Hazardous compound.* We would suggest changing the term “compound” to “material”. Also, we would suggest inserting the phrase “at specific levels” after “which” and before “has” to give meaning to the definition ( any chemical compound can be a hazard unless a level is specified). Thus the revised definition would read: “*Hazardous Material-* any chemical compound which, at specific levels, has the potential to cause adverse health effects.”

*Microbial hazards.* We would suggest rewriting the definition as follows. “*Microbial hazards-* pathogenic or other microorganisms at levels that have the potential to cause an adverse health effect.” This change both qualifies the microorganisms under consideration and relates them to a hazardous level.

### SECTION 3.1 ENVIRONMENTAL HYGIENE

#### DENMARK

A number of examinations and evaluations are mentioned. However, it is not stated what can be concluded from the results. As an example: “Previous usage of the site should be evaluated to identify potential microbial hazards including faecal contamination and contamination by organic waste.” A conclusion is missing. If the site contains fx organic waste, it should not be used.

Also, what is meant by the last sentence “If the contaminant are at excessive levels...”? Compared to what?

#### FINLAND

It is said that the access of farm and wild animals to the site should be assessed. Finland suggests that ‘‘access of farm and wild animals to the site and agricultural water sources should be assessed’’. Finland finds this necessary in order to minimise the faecal contamination through water.

#### PERU

We suggest combining the 1<sup>st</sup> and 2<sup>nd</sup> bullets proposing the following wording:

- The previous use of the production area and its adjacent areas should be evaluated (agricultural crops, animal feeding area, toxic waste zones, and sewage treatment areas), to identify environmental microbiological hazards which may contaminate the crop area.

Likewise, we suggest including a section with the following text:

- The contamination potential of the soil and the risk of contamination of the crops should be evaluated and identified.

Also, the third section should be modified as follows:

The existing practices should be reviewed and evaluated to determine the prevalence and probability that, due to lack of control of domestic and wild animals, the deposits of manure might enter in contact with the crops. Domestic and wild animals should, if possible, be excluded from the areas of primary production during cultivation and harvest periods.

#### **UNITED STATES OF AMERICA**

In the bullets following the second paragraph, we would suggest:

- In the first bullet, delete the words “should be evaluated”.
- In the second bullet, delete the words “should be evaluated”.
- In the third bullet delete the words “should be assessed”.
- In the fourth bullet delete the words “should be assessed”.

The concept of evaluation/assessment is included in the last sentence of the second paragraph.

### **SECTION 3.2. ENVIRONMENTAL HYGIENE**

#### **SPAIN**

In the third paragraph, 1st line, where it reads: “... lugar de alimentación animal, zona de residuos tóxicos etc...” [... feed lot, hazardous waste site etc...], it should read: “... zona de alimentación animal, depósitos de residuos tóxicos, etc...” [... feed lot, hazardous waste site, etc...].

#### **SECTION 3.2.1 AGRICULTURAL INPUT REQUIREMENTS**

##### **UNITED STATES OF AMERICA**

Add the words “or chemical” after “microbial” and before “contaminants” to include chemical contaminants in the requirement.

##### **SECTION 3.2.1.1 AGRICULTURAL WATER**

###### **DENMARK**

Water used for irrigation and harvesting. A list has been set up for areas which needs special attention with respect to the water quality. For these listed purposes only potable water should be used.

###### **PERU**

First paragraph, fourth line, substitute the word “correctiva” for the word “correctora”. This word “correctiva” is repeated several times in the text.

It is common in our lexicon to use the words “correctiva” and “corrector”, although both mean correction, the word *correctiva*, is used to indicate punishment and the word *corrector* is used to depict correction according with the rules; therefore it is more appropriate to use the word *corrector* and refer to correcting actions or measures; we suggest correcting this word in other portions of the text.

##### **UNITED STATES OF AMERICA**

The section headings “Water for fertilizers, pest control and other agricultural chemicals” and “Hydroponic water” should be in italics.

Under the section on hydroponic water, the first sentence is a lead-in to the provisions given. However, it seems somewhat of a non sequitur as written. We would recommend adding the following phrase immediately after the first sentence: “Because of this:”

### **SECTION 3.2.1.2 MANURE, SEWAGE SLUDGE AND OTHER NATURAL FERTILIZERS**

#### **DENMARK**

First paragraph, line 4: “..or other chemicals at levels that may adversely affect....”.

The word “adversely” should be deleted.

#### **PERU**

In the first paragraph at the end of the third line it says sludge treatment, it should say residual sludge.

#### **SPAIN**

In the fourth bullet, fourth line, we propose the elimination of the phrase “such as maximizing the time between application and the harvesting of fresh fruits and vegetables”, since we believe it could cause errors.

#### **UNITED STATES OF AMERICA**

In the second dash (-) point, add “and the results thereof” to ensure that all information is obtained and edit the end of the sentence to “...used, tests performed and the results thereof.”

In the third dash (-) point, change “high pathogen reduction” to “pathogen reduction to levels that do not represent a hazard to human health”. This clarifies the extent to which pathogen reduction should be accomplished.

### **SECTION 3.2.1.3 SOIL**

#### **UNITED STATES OF AMERICA**

In the second line, insert “may” between “hazards” and “exist”.

### **SECTION 3.2.1.4 AGRICULTURAL CHEMICALS**

#### **FINLAND**

It is said that chemicals should be used according to manufacturer’s instructions and that growers should keep records on the use of chemicals. In addition to this the growers should keep records on harvesting to make sure that the time between use of chemicals and harvesting is appropriate.

#### **PERU**

In the third bullet (dash), where it says: the growers should maintain records of agricultural chemical application. Records should “incluirán” include and text follows. The expression “*inclurian*” in quote marks should be substituted for the word “incluyan”.

Likewise, in the fifth bullet (dash) it says: the agricultural chemicals mix “debieran” should say the agricultural chemicals mix “deberían” and text follows.



**UNITED STATES OF AMERICA**

We suggest the following additional sentence be added to the end of the first bullet. "Pesticide chemicals must be registered and approved for use by an official body."

**SECTION 3.2.2.1 LOCATION****SPAIN**

In order to clarify the paragraph, we propose adding the following to the end of the paragraph: "such as insects, rodents and birds"

**SECTION 3.2.3.2 HEALTH STATUS****COSTA RICA**

Respiratory infections, such as colds, coughs etc. should also be included. In Paragraph 2 of the same number, completely enclosed facilities should also be included (to protect the product from insects, such as flies, bees or mosquitoes, since it receives only minimal processing).

**UNITED KINGDOM**

first sentence: suggest replace "a disease or illness" with "an infectious agent"

Beginning of second sentence: suggest replace "Infections" with "Types of illness"

**UNITED STATES OF AMERICA**

Rewrite the second sentence as follows. "Symptoms of transmissible infections include jaundice, diarrhea and vomiting." This change reflects the fact that jaundice, diarrhea and vomiting are symptoms of infections, not the infections themselves.

**SECTION 3.2.3.3 PERSONAL CLEANLINESS****PERU**

First paragraph, at the end of the second line after the period it says: the *cuts*, it should say the *wounds* and text follows.

**SPAIN**

In the first paragraph, third line, where it says: "Las cortadas y ..." [Cuts and...], it should say: "Las cortaduras y ..." [Cuts and...].

**UNITED KINGDOM**

Second sentence: suggest replace with "Personnel should wash their hands before starting work involving the handling of fruit and vegetables, each time they return to handling areas after a break, immediately after....."

**SECTION 3.2.3.4 PERSONAL BEHAVIOUR****COSTA RICA**

In the second paragraph, polished or long fingernails and makeup should be included.

**UNITED KINGDOM**

Second para, end of sentence: suggest insert “.....threat to the safety and suitability of the food”

**SECTION 3.2.4 EQUIPMENT ASSOCIATED WITH GROWING AND HARVESTING****COSTA RICA**

In the second paragraph, it should read “Their design and construction should facilitate cleaning” instead of “...to ensure that they can be adequately cleaned...”

**PERU**

We propose modifying the first paragraph as follows:

The Growers and harvesters should meet the technical specifications recommended by the equipment manufacturers, cultivators, harvesting machines and containers for their proper usage and maintenance. The following sanitary practices should be followed: and text follows as it is proposed in this section

**UNITED STATES OF AMERICA**

In the second dash (-) point, change the last sentence to read. “Such containers should be segregated or otherwise identified to prevent their use as harvesting containers.”

**SECTION 3.3.1 PREVENTION OF CROSS-CONTAMINATION****PERU**

In the second bullet, in the second line parenthesis, it says “desayunos (breakfasts)” it should say “comidas o fiambres (food or snacks)” and text follows.

**UNITED STATES OF AMERICA**

The wording of the last sentence of the first paragraph is an awkward construction since it implies that the bullets following are not in Section 3. We would suggest the insertion of the word “elsewhere” after “presented” and before “in” to correct the grammatical problem.

In the fourth dash (-) point, change “animal faeces” to “animal/human faeces”.

**SECTION 3.3.2 STORAGE AND TRANSPORT FROM THE FIELD TO THE PACKING FACILITY****PERU**

Before the first paragraph we suggest including the following text:

Transportation from the field to the packing facility should be made in the shortest possible time and in adequate sanitary conditions to keep produce deterioration to a minimum.

**UNITED STATES OF AMERICA**

We would suggest the insertion of a new bullet point as follows.

- “Transport vehicles should not be used for the transport of hazardous substances”

The Committee may wish to refer to the *Draft Code of Hygienic Practice for the Transport of Foodstuffs in Bulk and Semi-Packed Foodstuffs* currently under consideration in CCFH for further information on this suggestion.

## **SECTION 3.4.1 CLEANING PROGRAMS**

### **COSTA RICA**

In the third sentence, the term “to be” should be removed (... and should be regularly reviewed...).

### **UNITED STATES OF AMERICA**

First paragraph, last sentence, change “followed” to “follows”.

Add the phrase “and when necessary” to the end of the first dash (-) point.

## **SECTION 5.2.2 SPECIFIC PROCESS STEPS**

### **UNITED STATES OF AMERICA**

We would suggest a sub-section be added to this section covering ripening rooms.

### **5.2.2.1 POST-HARVEST WATER USE:**

#### **DENMARK**

First paragraph: “clean water could be used for initial washing stages”. This depends on the type of product. Berries, lettuce etc. should be rinsed only with potable water.

Disinfection is defined in the Recommended International Code of Hygienic Practice – General Principles of Food Hygiene, CAC/RCP 1-1969, Rev. 3-1997 as “the reduction, by means of chemical agents and/or physical methods, of the number of microorganisms in the environment, to a level that does not compromise food safety or suitability”. Disinfection is normally used for the antimicrobial treatment of surfaces of food contact materials, tools etc. The normal requirement would be that after disinfection, the surface etc. is cleaned with clean water. Denmark finds that treatments like this should not be called disinfection or cleaning.

Denmark is of the opinion that the treatment covered by the paragraph should be regarded as food additive use. Denmark will draw attention to the Codex definition on food additives: “Food additives means any substance normally consumed as a food by itself and not normally used as a typical ingredient of the food, whether or not it has nutritional value, the intentional addition of which to food for a technological (including organoleptic) purpose in the manufacture, **processing, preparation, treatment,...**”. Denmark finds that the purpose of the treatment, as described in the draft code, is technological

#### **FINLAND**

A reference to Discussion paper on proposed draft guidelines for the hygienic reuse of processing water in food plants (CX/FH99/13) could be made

#### **SPAIN**

In Spanish version, we propose changing the heading of this section to “Utilización del agua después de la recolección” [Post-harvest water use]

#### **UNITED KINGDOM**

End of first para: suggest “.....final rinses should be of potable quality”

### **SECTION 5.2.2.3 COOLING OF FRESH FRUITS AND VEGETABLES**

#### **UNITED KINGDOM**

Second para, second sentence: typo “throughly” should read “thoroughly”

#### **UNITED STATES OF AMERICA**

First dash (-) point, second line, change “on to” to “onto”.

### **SECTION 5.2.2.4 COLD STORAGE**

#### **UNITED STATES OF AMERICA**

We would inquire as to whether this section includes and adequately addresses controlled atmosphere (CA) storage?

### **SECTION 5.7 DOCUMENTATIONS AND RECORDS**

#### **PERU**

In the second line of the first paragraph it says the “rastreabilidad (trace back), it should say “trazabilidad (traceability)”. The word traceable, according to technical jargon (in the *Diccionario de la lengua* the word “trazado (tracing)” is indicated) is more appropriate for the text since it indicates track or direction.

#### **SPAIN**

In the second line, we propose substituting the word “trazabilidad” [trace back] for “rastreabilidad” [trace back].

### **SECTION 5.8 RECALL PROCEDURES**

#### **PERU**

In the first dash (-) point, line one, “Growers and packers should (**debieran**) have trace-back programs...” It (Spanish version) should say “Growers and packers should (**deberian**) have trace-back programs and text follows.

#### **SPAIN**

We propose changing the heading to: “Product recall”.

In the first line of the first bullet, where it says: “rastreabilidad” [trace-back], it should say: “trazabilidad” [trace-back].

### **SECTION 10.1. AWARENESS AND RESPONSIBILITIES**

#### **SPAIN**

In the header where it says “Responsabilidade” [Responsibility //misspelled//], it should say: “Responsabilidad” [Responsibility].