

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel.: 57051 Telex: 625825-625853 FAO I E-mail: Codex@fao.org Facsimile: +39(06)5705.4593

Agenda Item 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME **CODEX COMMITTEE ON FOOD HYGIENE**

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PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR PRE- CUT RAW VEGETABLE PRODUCTS READY FOR HUMAN CONSUMPTION AT STEP 3

Following countries, Brazil, Denmark, Finland, India, Italy, Mexico, Peru, Republic of Korea, Spain, and the United States of America submitted comments in response to the document CX/FH 99/7.

GENERAL COMMENTS

BRAZIL

The form of the document is adequate, but should be improved. The basis of risk analysis and of application of the HACCP system is clear in the document. Some comments that we consider necessary are:

- The document does not include clear instructions for washing, but for disinfection;
- The standards for fruit juices are under revision by the Ad Hoc Codex group, according to the last meeting of the Codex Alimentarius Commission. It would be interesting to verify if it should be revised in this document as well.
- There is a document in process on recycled water. Due to this, we believe that this document should make reference to that document, without prolonging the topic with no practical necessity.

We emphasize the need to include sprouts such as alfalfa sprouts and soy sprouts, as well as fresh aromatic herbs, mushrooms and algae.

INDIA

The draft Code takes into account all proposals made in the Draft Code for Primary Production. India would like to state that the code for Pre Cut Raw Vegetables should be taken up for consideration only after the Code for Primary Production is settled. Even at a stage when the Code of Pre Cut Raw and Vegetables is to be taken up, HACCP need not be introduced in the beginning itself because of the flexibilities available to developing countries under GATT.

MEXICO

Mexico considers in a general manner, the dispositions of this code could be presented as an appendix of the Proposed Draft Code of Hygienic Practice for Primary Production, Harvesting and Packing of Fresh Fruits and Vegetables. If this is not applicable, we suggest the following modifications; same as the ones presented in Spanish version to the France delegation and as such we confirm.

In the code title and in paragraphs where the term “hortalizas” (vegetables) is used, this term must be substituted with “vegetales” (vegetables) in order to be consistent with the definition established in body of the document “vegetable products”.

Throughout the document substitute the term "norma" (standard) with the word "Código" (code).

REPUBLIC OF KOREA

According to the section 2.3(definitions) of this code, the term "vegetable products" means "fruits, vegetable(including mushrooms and algae), [and aromatic herbs]". However, the term "vegetable" is not generally used to mean "fruit and vegetable". Moreover both fruit and vegetable spell out in "Code of hygienic practice for the primary production, harvesting and packing of fresh fruits and vegetables" under development at this time. We therefore suggest substituting "fruit and vegetable products" for "vegetable products" in title, definition and text of this code to prevent confusion and to ensure consistency of the term usage in the two codes.

UNITED STATES OF AMERICA

The United States would like to express it thanks to the Delegation of France for undertaking the revision to the Code. The United States believes progress has been made on the Code, although substantial work continues to remain on its development.

The United States believes that it would be beneficial to revisit the subject of whether this Code ought to be combined with the *Proposed Draft Code of Hygienic Practice for the Primary Production, Harvesting and Packing of Fresh Fruits and Vegetables*, perhaps with a name change of this latter Code to the *Proposed Draft Code of Hygienic Practice for the Primary Production, Harvesting, Preparation and Packing of Fresh Fruits and Vegetables*. These two Codes are clearly companion documents with one emphasizing the primary production section and the other the control of operations section. The interest of Codex and the users of these Codes would be best served by combining them.

While the United States recognizes that this Code is at an early stage of development, there are significant technical sections of this document that remain to be prepared. It will be important that these sections reflect currently available science and technology.

Attention needs to be paid to the numbering of sections. In some cases, section numbering is omitted or is incorrectly numbered.

The English version of the document should be carefully reviewed from the standpoint of translation to ensure the best means of expressing the precise information and intention of the Code.

COMMENTS ON SPECIFIC SECTIONS OF THE CODE**TITLE****SPAIN**

The title of the Code of Practice in the Spanish version does not match that of the versions in French or English, thus we propose substituting the following title:

“Anteproyecto de Código de Prácticas de Higiene para los productos vegetales crudos transformados listos para el consumo humano” (Draft Code of Hygienic Practice for Pre-cut Raw Vegetable Products Ready for Human Consumption).

INTRODUCTION

MEXICO

In the third line of the second paragraph of the introduction, it is proposed to include the term “frescas” (fresh) after “Frutas y Hortalizas” (Fruits and Vegetables), to quote the document with its exact name, correction which should be made every time this is mentioned.

SPAIN

In the first line where it says: “ This standard follows...”, it should say: “This Code follows...”, since this is a Code of Practice and not a Standard.

In order to improve the reading of the 2nd sentence in the first paragraph, we propose that it be changed to the following:

“Las recomendaciones del presente código contienen para cada sección solamente las recomendaciones específicas para los productos contemplados en su ámbito de aplicación, y deberían respetarse como complementos de los Principios Generales de Higiene de los Alimentos.” (The recommendations of this code, which contains in each section only the specific recommendations for the products covered by the scope, should be followed in addition to the General Principles of Food Hygiene).

In order to improve the reading of the second paragraph, we propose that it be changed to the following:

Por otra parte, la sección del presente código relativa a la producción primaria se refiere a las disposiciones [que se están elaborando] del Anteproyecto de Código de Prácticas de Higiene para la Producción Primaria, la Recolección y el Envasado de las Frutas y Hortalizas frescas, que deberían aplicarse a la producción de las materias primas utilizadas para elaborar los productos tratados en este código” (/On the other hand, the section of this code which relates to primary production refers to the provisions [under development] of the proposed Code of Hygienic Practice for Primary Production, Harvesting and Packaging of Fresh Produce, which should be applied to the production of the raw materials used to produce the products considered in this code).

UNITED STATES OF AMERICA

The introduction does not give a background for the document that follows. The introduction should give the basis for why this Code is needed, i.e. why do pre-cut fruits and vegetables merit special consideration with regards to concerns about food safety. For example, the introduction could note the importance of a diet rich and fruits and vegetables, the increase in consumption of fresh cut fruits and vegetables, and any recent reports of foodborne illnesses associated with pre-cut fruits and vegetables. The material that is currently in the Introduction is more appropriately placed in Section 2.2. use of the document.

SECTION 1 OBJECTIVES

MEXICO

In the first paragraph of the objective it is suggested to substitute the term “por consumo (for

consumption) for “utilizarse” (use). As well as, in the third line, substituting the word “Dan” (give) for “proporcionar” (provide).

SPAIN

In order to improve the reading of the first and second paragraphs, we propose substituting the following text:

“Las recomendaciones de este código de prácticas deben permitir el control de riesgos biológicos, físicos y químicos, específicos de los productos vegetales crudos precortados listos para utilizarse. Sin embargo, se diseñan más específicamente para el control de los riesgos de naturaleza microbiológica. Proporcionan los elementos a tener en cuenta durante la elaboración, la transformación y la distribución de estos alimentos” (The recommendations of this code must ensure the control of risks, biological, physical or chemical, specific to ready to use, raw, pre-cut vegetables. They are, however, designed more specifically for the control of risks of microbiological nature. They give elements that must be taken into account in the production, processing and distribution of these foods).

La aplicación de estas recomendaciones, que deberían adaptarse a la realidad de cada instalación, es tal que aseguraría el control de las exigencias sanitarias de cada uno de los operadores de este sector” (The application of these recommendations, which should be adapted to each installation, is such that it would ensure the control of hygienic requirements by each operator of this sector).

UNITED STATES OF AMERICA

In this section, as well as the definitions and other sections, the term “vegetable” is used to mean both fruits and vegetables. We recommend the use of the term “fruits and vegetables” to clarify the type of foods that are the subject of this Code. The *Proposed Draft Code of Hygienic Practice for the Primary Production, Harvesting and Packing of Fresh Fruits and Vegetables* defines the term “fruits and vegetables”. Additionally, the objective should more clearly state that microbiological hazards are the focus of this Code. This section needs to target more specifically the objectives of the Code and outline a general framework for the recommendations that follow.

As presently written, the second paragraph is repetitive of the concepts presented in the first paragraph of this section and could be deleted.

SECTION 2 SCOPE, USE AND DEFINITION

UNITED STATES OF AMERICA

This section requires additional clarification with respect to the scope of the products covered under this Code. Section 2.1 “Scope” should address what the Code covers and what stage in the food chain is targeted. For example, this draft Code would be covering the general hygienic practices for the processing of pre-cut fruits and vegetables for human consumption in order to produce a safe and wholesome product. Specifically, this draft Code would apply to the processing of fresh fruits and vegetables following harvest in the field (with or without cover) or indoors (hydroponic, greenhouse).

Further, it should state that the Code concentrates on microbiological hazards and addresses the physical and chemical hazards only so far as they relate to good manufacturing practices.

In addition to what the Scope indicates is not covered in the Code, it should also state that the Code does not cover pre-cut fruits and vegetables intended for further processing or the further handling or processing of pre-cut fruits and vegetables at retail, food service or in the home.

The scope should make clear that this Code does not include juice.

There appears to be confusion as to whether aromatic herbs are included or excluded from the Code. Recognizing that the information is in brackets, the Scope excludes aromatic herbs while the definition for “vegetable products” includes them. Clarification is needed as to whether this product is or is not included in the Code.

The United States recommends that the scope include the processing of precut fruits and vegetables in the field.

SECTION 2.1.1 FOOD CHAIN

MEXICO

First Paragraph, second and fourth line, substitute "que han sido" (which have been) for "siendo" (having been), "procede" (originated) for "se produjo" (produced) and the term "individuales" (individuals) for "domesticas" (domestic)

In the third paragraph, it is suggested to substitute the term “germinados” (sprouts) for “brotes” (bud).

SPAIN

In the Spanish version, it is not sufficiently clear whether or not the scope of application includes freshly squeezed fruits and juices, unless the title of this version is modified as indicated in our first comment.

Nevertheless, we propose the following reading for section 2.1.1.

“This standard for hygiene applies to raw vegetable products, ready for use for human consumption, having been peeled, cut or otherwise prepared in a manner that sufficiently affects the integrity of the product to change its evolution in relationship to the raw material from which it came, and packed in single or collective units.”

The recommendations of this guide also apply to vegetable products that need seasoning or cooking before they can be consumed.

This code does not apply to: sprouts (such as alfalfa or soybean), aromatic herbs (mint, parsley, tarragon), as well as preparations containing sauces, vinaigrette, etc.

Products containing vegetables are covered by the scope of the Code and mixed foods of animal and vegetable origin, which are not separated physically, are excluded from the scope.”

SECTION 2.2 USE

MEXICO

First paragraph, fourth and last line, we suggest replacing the term “respectarse” (respected) to “aplicarse” (applied).

SPAIN

In order to improve the reading of section 2.2, we propose changing it to the following:

“This Code of Practice follows the format of the Recommended International Code of Practice – General Principles of Food Hygiene, CAC/RCP 1-1969, Rev. 3-1997. The recommendations of this code contain only the specific recommendations for the products concerned in the scope of application, which should be respected as a complement to the General Principles of Food Hygiene.

“Por otro lado, la parte del presente Código relativa a la producción primaria se refiere a las

disposiciones [que se están elaborando] del Código de Prácticas de Higiene para la Producción Primaria la Recolección y el Envasado de las Frutas y Hortalizas, que deberían aplicarse a la producción de la materia prima utilizada para elaborar los productos contemplados en este Código” //On the other hand, the section of this code which relates to primary production refers to the provisions [under development] of the proposed Code of Hygienic Practice for Primary Production, Harvesting and Packaging of Fresh Produce, which should be applied to the production of the raw materials used to produce the products considered in this code//.

SECTION 2.3 DEFINITIONS

MEXICO

The following wording is suggested:

" Fresh precut vegetable products ready for consumption, which have been peeled, cut...to change their constitution in relation to the raw materials from which they originated".

SPAIN

In order to improve the reading of section 2.3., we propose substituting the following text:

“Para los fines del presente Código se definen los siguientes términos y expresiones:” //In this code, the following terms and expressions are defined as follows://

“Productos vegetales: frutas, hortalizas (incluidos setas, champiñones y algas), y las hierbas aromáticas” //Vegetable products: fruits, vegetables (including mushrooms and algae) and aromatic herbs//.

“Ready to use vegetable products: raw vegetable products, ready for consumption or cooking, which have been peeled, cut or prepared otherwise, (including juices), affecting sufficiently the integrity of the product to change its evolution as compared with the raw material from which it is prepared.”

On the other hand, we think that the Hygiene Committee needs to consult with the recently formed Ad Hoc Group on Juices prior to including juices in the Code.

REPUBLIC OF KOREA

The term "ready to use vegetable products" means "raw vegetable products, ready for use for human consumption, which have been peeled, cut or prepared otherwise," in this section. This term is limited to "raw" products and does not include "cooked" products. However the term "ready to use vegetable products" does not make it clear that "cooked" products are excluded. We therefore suggest substituting "ready to use raw fruit and vegetable products" for "ready to use vegetable products" to sufficiently express the original meaning.

UNITED STATES OF AMERICA

A careful review of the document should be made to ensure that all terms needing defining are incorporated into this section.

A review of the current definitions should be done. See the note above for comment on the use of the term “vegetable” to include both “fruits and vegetables”. Additionally, defining a “vegetable product” as a fruit or vegetable is too broad; the use of the work “product” implies some processing.

In the definition for “ready to use vegetable products”, The phrase in brackets “[including transformed into juice]” should be deleted. Fresh juice products are significantly different from fresh cut produce and would be better addressed in a separate document or in an annex to an expanded *Proposed Draft Code of Hygienic Practice for the Primary Production, Harvesting, Preparation and Packing of*

Fresh Fruits and Vegetables as mentioned above. Additionally, this definition is awkward in its grammatical construction and needs to be rewritten for clarity.

SECTION 3 PRIMARY PRODUCTION

MEXICO

Substitute the term "plaguicidas" (pesticides) for "insecticidas" (insecticides), with the purpose of being more general.

SPAIN

In order to have the reading of the first paragraph agree with the texts in the English and French versions, we propose the substitution of the following text:

“Las materias primas vegetales pueden afectarse por diferentes contaminantes: los residuos de fertilizantes, de insecticidas, de contaminantes medioambientales, los metales pesados, los microorganismos, parásitos diversos (la duela, por ejemplo, en las plantas acuáticas, tales como el berro), etc.” //Vegetable raw material can be affected by different contaminants: fertilizer residues, insecticides, environmental contaminants, heavy metals, microorganisms, miscellaneous parasites (liver fluke, for example, in aquatic plants such as watercress), etc.//

UNITED STATES OF AMERICA

The first paragraph of this section should be expanded to encompass the need for fresh pre-cut produce operators to have knowledge of the conditions affecting incoming raw supplies and mechanisms the operators can use to communicate raw supplies requirements/criteria to suppliers.

A rewording of the second paragraph is recommended to more clearly emphasize the *Proposed Draft Code of Hygienic Practice for the Primary Production, Harvesting and Packing of Fresh Fruits and Vegetables* as the primary source of information relating to the primary production of fruits and vegetables intended for use in preparing fresh pre-cut produce.

SECTION 3.3 HANDLING, STORAGE, TRANSPORT

MEXICO

First paragraph, substitute the following: “The intrinsic fragility of vegetable products ready for consumption requires special supervision or monitoring of transportation operations, handling, and storage. Precautions should be taken to prevent contamination and decomposition of the products. Particularly, adequate cooling processes should be used.”

PERU

In the second paragraph, it says in the last line: “after they have been submitted to a peeling greater it should be avoided”, it should say “...after being submitted to greater peeling it should be avoided”(This line is not in the English version of the document).

UNITED STATES OF AMERICA

This section contains both the concepts of cross-contamination and deterioration. Rewriting is necessary to more clearly separate and identify these two concepts and provide information on controlling both areas. Section 3.3 should more fully address ways to prevent cross contamination; this would require some explanation of how contamination can occur during the early handling and

processing stages. The same (that is, the need for more fully addressing the area) is true for product deterioration.

The term “the intrinsic fragility” needs to be defined. Does it mean “perishability”? If so, should the term “perishability” be defined?

The sub-sections of the Section dealing with the “Pre-Refrigeration Process needs need to be expanded and recommendations provided.

SECTION 3.1.1.1 HYDRO COOLING

MEXICO

Substitute "Hidroenfriamiento" (Hydro-cooling) for “Refrigeración húmeda” (humid Refrigeration).

SECTION 3.1.1.2 VACUUM COOLING

MEXICO

Substitute "enfriamiento en vacío" (vacuum cooling) for “refrigeración en vacío” (vacuum refrigeration).

SECTION 3.3. HANDLING, STORAGE AND TRANSPORT:

SPAIN

In order to make the reading of the last sentence in the second paragraph coincide with the texts in English and French, we propose removing said sentence, since it does not appear in the aforementioned texts.

SECTION 3.3.2.3 STORAGE IN CONTROLLED ATMOSPHERE

DENMARK

The attention should be drawn to the newly published Council of Europe “Guidelines for packaging in Modified Atmosphere” which is dealing the control aspects of the microbiological aspects of a modified or controlled atmosphere.

SECTION 4 ESTABLISHMENT: DESIGN AND FACILITIES

MEXICO

Title and first line, Substitute "diseño" (design).for "proyecto" (project).

UNITED STATES OF AMERICA

Section 4.4.6 is not clear. This title includes a reference to air quality but the text discusses water and condensation. Since air quality can be important for open-air facilities we would suggest dividing this subject into two provisions, one for air quality and the other for ventilation. The provision on ventilation could read: “Since the pre-cutting, cleaning and conveying of vegetable products during their preparation uses significant amounts of water, an adequate ventilation system should be employed to avoid contamination from condensate.” The provision on air quality could read: The quality of air in packing houses and other processing establishments should be such that it will not adversely effect the safety of fresh produce.

SECTION 4.4.2 DRAINAGE AND WASTE DISPOSAL

MEXICO

Third paragraph, complement the final sentence of the text as follows: "regardless of outside temperature".

SECTION 4.4.6 AIR QUALITY AND VENTILATION

MEXICO

The text is confusing since it first indicates the necessity of water for this type of process, however it does not establish what action is taken respectively. The second sentence indicated is relative to ventilation, which is not related with the necessity of water use. We suggest to keep only the second sentence if the idea is to outline for the establishment to count on proper ventilation, such that water condensation and product contamination risks are avoided, as a result of the large amount of water used in the process.

SECTION 5.1 CONTROL OF FOOD HAZARDS

DENMARK

The first bullet on chemical hazards mention "disinfecting procedures with substances..."

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 not 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.

The use of food additives are covered by the Codex Committee on Food Additives and Contaminants, in the General Standard on Food Additives (GSFA) and we propose a reference to this standard to be included in the draft code.

MEXICO

We suggest modifying the name of the item as follows:

"5.1 Control de Peligros en Los Alimentos"

In this same item, paragraph one, the following modification of the terms is suggested: "enlazados" (connected) for "relacionados" (related) in this paragraph as throughout the document where the term "conectada o conectados" (connected) exists, we suggest substituting for "asociada o asociados" (associated). On the other hand, we suggest merging the ideas of the first and second sentences of the same paragraph as follows:

Among the related risks, primary production should be controlled in this stage.

In mentioning microorganisms in the chemical risks and microbiological risks “Ciclospora or Cyclosporidium” are mentioned as examples, we suggest: “Cyclospora and Cryptosporidium.”

In the third paragraph relative to chemical risks, we suggest substituting “fertilizantes” (fertilizers) for “nitratos” (nitrates) for and “indeseables” (undesirable) for “objeccionables” (objectionable).

Likewise, we suggest substituting the term "materias primas" (raw materials) for "materia crudas" (raw materials) and "calidad sanitaria" (sanitary quality) for "calidad de higiene" (hygiene quality).

Sixth paragraph, we suggest substituting the "mencionados anteriormente" (previously mentioned) for " notados más adelante" (noted later).

SPAIN

The last bullet in this section should be clarified as to whether the expression “it is necessary to control and to monitor the humidity and temperature of these products” refers to intermediate or final products.

UNITED STATES OF AMERICA

We find this section to be too general to provide significant help in controlling food hazards.

Reference should be made to the *Proposed Draft Code of Hygienic Practice for the Primary Production, Harvesting and Packing of Fresh Fruits and Vegetables* and focus primarily on those food hazards that apply to processing of pre-cut produce. Additionally a clearer separation should be made between the control of microbiological and chemical hazards, and more information, as needed, should be provided on the control of microbiological and chemical hazards.

We also note the recommendation for periodic tests on raw materials. If this recommendation is to be retained, more detail is needed to provide helpful guidance on the area.

SECTION 5.2 KEY ASPECTS OF HYGIENE CONTROL SYSTEMS

UNITED STATES OF AMERICA

The specific temperature ranges given in Section 5.2.1 need not be referenced; processors are already familiar with the temperature ranges, which are most suitable for their products. The third paragraph under this section needs to be rewritten; it is long and confusing and states that products should be chilled before packaging. Not all products are chilled before or after packaging.

SECTION 5.2.1 TIME AND TEMPERATURE CONTROL

INDIA

At a time when a code of hygienic practices for pre cut vegetables becomes necessary, the second paragraph under para 5.2.1 may read as follows :

The products should be chilled as soon as possible to a temperature that will allow them to be kept safe until they are turned over to the consumers. Due to specificity of the product concerned in this Code, measures should be taken to avoid freezing”.

The second and third paragraphs under para 5.2.1 should be deleted. The reason for this suggestion is that in case of developing countries, it is not possible to monitor temperature in the aircraft as most of their exports are effected through passenger flights.

MEXICO

First paragraph, we suggest: substitute the term "frío" (cold) for "refrigeración" (refrigeration), likewise we suggest the following wording for the example: "using water for washing and rinsing at an appropriate temperature with the purpose of reaching storage temperature prior to packaging".

Second paragraph, substitute the terms "hidrorefrigeración y refrigeración" (hydro-refrigeration and refrigeration) by "hidroenfriamiento y enfriamiento" (hydro-cooling and cooling), respectively.

Paragraph 3 and four where forms of cooling control are exemplified. In reference to the last paragraph the proposed wording is:

"To insure proper control of the cold chain there must be constant monitoring (and if possible, a continuous record) of the critical point temperatures."

PERU

In the fourth paragraph, at the end of the first and second line, in brackets it says [y si sea posible, un *récord* continuo] [and if possible, a continuous *recording*] ,it (Spanish version) should say [y si sea posible, un *registro* continuo] [and if possible, a continuous *recording*] and text follows.

SPAIN

Since we are in agreement with the contents of the bracketed phrase, we propose that the brackets be removed and the word "récord" (record) be changed to "registro"(record).

SECTION 5.2.2.1 CLEANING AND DISINFECTING**FINLAND**

It is said that "Chlorination and other disinfection measures should be carried out only if it appears necessary on the basis of a through risk analysis , including a risk/benefit analysis". Finland suggests that in addition to risk/benefit analysis the essential parts of risk management (option assessment and option implementation) be mentioned. Finland finds this clarification to be important in order to courage the industry to consider more deeply the use of other measures than disinfection to reduce the microbiological hazards and also to emphasise that when the decision to use or not to use disinfection is made, both microbiological and chemical risk assessment is needed. Finland also finds the title 5.2.2.1 a little bit confusing. Cleaning and disinfection usually means cleaning and disinfection of surfaces in production environment. That's why more detailed title like 'Use of disinfection to lower the microbiological contamination of the products ' is needed.

ITALY

One should use only potable water. The use of disinfectant (e.g., chlorine or ozone) in water should not be allowed.

MEXICO

Although, they should follow good practices to control microorganisms, Products could be washed with water containing chlorine after an exhaustive risk analysis. And in every case strictly to the necessary dose and consider the hazard presented (such as chloramines). The procedure should continue with proper rinsing with potable water to limit the amount of disinfectant.

The time of average contact between disinfection and rinsing must be validated and monitored to optimize operations.

PERU

The sixth line says: “debería limitarse estrictamente *al dosis necesario*” (should be strictly limited to *the necessary dose*),, it (Spanish version) should say ”debería limitarse estrictamente *a la dosis necesaria*”, and text follows.

The ninth line says:”*tiempos del contacto mediano* durante la desinfección...”(The average contact times during disinfecting”], it (Spanish version) should say “... *tiempos de contacto promedio* durante la desinfección” and text follows.

UNITED STATES OF AMERICA

It is inappropriate to recommend a thorough risk analysis before deciding on what types of disinfection measures to use. That is not the responsibility of a processor. The safety concerns and use of disinfectants are addressed in other fora and by national governments. Guidance in this document should be limited to ensuring appropriate use and following the manufacturers’ instructions.

Also in Section 5.2.2.1, clarity needs to be provided on what constitutes a “good rinse”. The term “renewed water” also needs to be defined. The drafters may wish to refer to the *Discussion Paper on Proposed Draft Guidelines for the Hygienic Reuse of Processing Water in Food Plants*, currently under development by the CCFH. More clarity also needs to be given to what is meant by “validated and watched in order to optimize the procedures”.

SECTION 5.2.2.2 WATER RECYCLING**PERU**

The second line says: “*incrementa* los peligros de la salud...” (...increases dangers for health.” (the Spanish version) it (Spanish version) should say “..*incremente* los peligros a la salud...” and text follows.

The fourth line says: “no *incremente* el nivel de los microorganismos peligrosos...”(does not increase the level of dangerous microorganisms...”),it (Spanish version) should say “...no *incremente* el nivel de los peligros microbianos”.

UNITED STATES OF AMERICA

The term “recycled water” is used but is not defined. Again the drafters may wish to refer to the *Discussion Paper on Proposed Draft Guidelines for the Hygienic Reuse of Processing Water in Food Plants* in developing this section of the document.

SECTION 5.2.2.3 DRYING OR DRAINING [OR RESIDUAL WATER CONTENT]**SPAIN**

We propose substituting the following title for the current one: “**5.2.2.3. Drying**”.

MEXICO

Should be presented before the item addressing water recycling, also we suggest substituting the term “Desague” (Draining) for “Secado” (Drying), in the title as well as in the text of the item.

We suggest modifying the wording of the first statement as follows:

““The good conservation of some of the...discussed in this code, is a function of their moisture content...”

SECTION 5.2.4 MICROBIOLOGICAL CROSS-CONTAMINATION**UNITED STATES OF AMERICA**

As it is developed, should discuss sources of microbiological cross contamination from water, food contact surfaces and other sources besides raw materials.

SECTION 8.2 REQUIREMENTS**SPAIN**

The section title, which is “8.2. Requirements”, should be “8.1. Requirements”.

In Section 8.1.1., in the second line, where it says: “... hortalizas hojosas ...” //... leafy vegetables... //, it should say: “... hortalizas utilizadas por sus hojas ...” //... leafy vegetables... //.

SECTION 8.2.1 TEMPERATURE CONTROL**MEXICO**

In item 8.1.1 (Spanish Version only), we suggest substituting “débil conductividad térmica” (weak thermic conductivity) for “inercia térmica baja” (low thermal inertia).

UNITED STATES OF AMERICA

It is confusing and needs to be clarified. If the provisions of the *Recommended International Code of Practice: General Principles of Food Hygiene* are sufficient, only a reference to this document needs to be given. If additional provisions are needed to ensure proper temperature, these need to be given.