



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
FAO/WHO COORDINATING COMMITTEE FOR AFRICA**

**Twenty-Third Session,**

**Nairobi, Kenya, 02 – 06 September 2019**

*Comments of Kenya*

**AGENDA ITEM 9: DRAFT STANDARD FOR FERMENTED COOKED CASSAVA BASED PRODUCTS - COMMENTS AT STEP 6 (CX/AFRICA 19/23/12)**

Kenya proposes the following:

- Para 2, last sentence: Editorial change of the word “to” and replacement with “at” to read “For preservation purpose, fermented cooked cassava based products can be stored and transported fresh ~~to~~ **at** a freezing or deep freezing temperature, and cooking is done at the place of consumption”.
- Para 3.2: Due to diverse processing methods and forms of presentation of the products, it is not technically feasible to set the limits on moisture content and Total Acidity for these products. Kenya proposes exclusion of Moisture Content and Total Acidity.
- Para 5: Kenya proposes to advance the standard with limits of HCN from 2 to 10mg/kg based on risk assessment by JECFA (2013) which confirmed the level of 10mg/kg as safe for consumption (Ref. CCCF 2013 report, agenda item 10)
- Annex 1: Additional provisions and examples of fermented cooked cassava: retain Annex 1 as optional for information purposes with the provisions in 3.3.2;3.3.3; 3.3.4 indicated as **xxxx** replaced with appropriate values.

**AGENDA ITEM 10: DRAFT STANDARD FOR *GNETUM* SPP LEAVES - COMMENTS AT STEP 6 (CX/AFRICA 19/23/13)**

Kenya proposes to advance draft standard to the next stage since there are no contentious issues.

**AGENDA ITEM 11: PROPOSED DRAFT REGIONAL STANDARD FOR DRIED MEAT (CX/AFRICA 19/23/14) (At Step 3)**

**Kenya proposes the following amendments/ changes: -**

- Para 3.3.3: Deletion of the word “**thoroughly**” to remove ambiguity; **introduce “/or”** between “cured and smoked” to read “cured and/or smoked” to clarify that the meat can be subjected to one or both of the processes.
- **Para 6.2 (Table 1): Microbiological Criteria**

Kenya made the following observations and would like to comments as follow: -

1. The scope of the draft standard covers dried meat products that are “**ready to eat**” and for “further processing”. The ‘tolerances’ for the two categories cannot be the same for safe use. Kenya proposes to separate the two categories in Table 1.
2. Total Bacterial Count (TBC) determination is majorly important for manufacturing purposes (***GAIN Report Number: IN5120 dated 9/11/2015- Microbiological Standards for Meat and Meat products***). Since the dried meat is a final product, TBC screening may be excluded.
3. The tolerances should consider the regional context and also focus only on essential microbiological contaminants that pose risk to health and safety of consumer to facilitate effective and efficient implementation of the standard. On this basis, it is proposed to:-

- exclude *Coliforms* and retain *E.Coli*
  - exclude *E. Coli 0157:H7* which is not easy to determine in the African context
  - exclude *Enterobactericea* which is a group under *Coliforms*
  - exclude *Bacillus* – because it's an anaerobic bacterium which is unlikely to thrive in a dry product such as dried meat product
  - exclude *Clostridia*- because it's an anaerobic bacterium which is unlikely to thrive in a dry product such as dried meat product
4. *Staphylococcus Aureus* is an important hygiene indicator and should not be detected in ready to eat product.
  5. *E. Coli* is an important hygiene indicator and should not be detected in ready to eat product.

The proposed Max. limit for dried meat for further processing is 100 cfu/g (**Book 8, 2011 Clause 8.6.2.4**)

6. *Yeast and Moulds* are important indicators of shelf life of product; proposed Max. limit is 10<sup>4</sup> cfu/g as per research done in Africa, most of the dried meat have up to 10<sup>5</sup> (*Jones et al., 2017. S. Afr. J. Anim. Sci. vol. 47; Dean Burfoot et al ,2010: Hazards associated with Biltong and similar Dried meats, Report to food Standards Agency pg. 20*)
7. *Salmonella* is pathogenic and should not be detected in both products
8. The units of measure are already indicated in the column for characteristics and therefore should not be repeated under tolerances column.

Based on the above considerations, the proposed microbiological tolerances are shown below.

Table 1 — Maximum Tolerable Microbiological Requirements for Dried Meat

Characteristics	Tolerances (Ready to eat)	Tolerances (For further processing)
Total bacteria count, max, cfu/g	100 000	
Coliforms, max., cfu/g	100	
<i>Escherichia coli</i> , cfu/g	10 Not-detected	100
<i>E. Coli 0157:H7 other STEC</i>	Negative in 125g	
<i>Enterobactericeae</i>	100/g	
<i>Salmonella</i> , cfu/25 g	10 <sup>3</sup> /g Not Detected	Not Detected
Staphylococci, cfu/g	10 <sup>3</sup> /g Not Detected	1000
<i>Bacillus cereus</i> , cfu/g	Absent in 0.1 g	
Sulphite reducing <i>Clostridia</i> /g, max., cfu/g	100	
Yeast and Moulds count/g, max., cfu/g	100-10000	10000

- Para 6.3 (Table 2): Introduction of a dash (-) for minimum Ash Content in row No. 6 to remove ambiguity due to the blank section in the table
- Para 7.2: Addition of the word “of” between “container food grade” to read “container of food grade” for clarity; and deletion of the last sentence “It can also be shrink—wrapped” since it doesn’t add value to specify this particular method of packing among the other methods in the standard.

**AGENDA ITEM 13: DISCUSSION PAPER AND PROJECT DOCUMENT PAPER ON THE DEVELOPMENT OF A REGIONAL CODEX STANDARD FOR FERMENTED NON-ALCOHOLIC CEREAL BASED DRINK (MAGEU)**

Kenya proposes the following amendments/ changes: -

**i) Discussion Paper**

- Entire document: Use the name "**Mageu**" consistently instead of alternating with "Emaheu" to avoid any confusion
- Para 1.3: Clarification of the term "cream" to remove ambiguity
- Para 1.4: Deletion of the term "e.t.c" in the document to avoid speculation
- Para 2: Deletion of the word "**and**" from subtitle and replace with **a full stop** to complete the statement.
- Para 4.1; 4.2: The justification of consumption of Mageu as an alternative to alcoholic beverages to be clarified by the initiator of the subject.
- Para 4.3: Consistency to either "Eswatini" or "Kingdom of Eswatini" as the name of the country in the entire document.

**ii) Project Document**

- Para 1: add the word "**and**" between "quality safety" in second sentence to read "quality and safety" to differentiate the two variables
- Para 2: delete the words "**as more and more consumers are consuming the product**" from the first sentence to remove repetition
- Para 4 (a): **indicate units of measure for the quantities of production for clarity; specify which countries for the production figures to be consistent with the sub-title for the table; clarify whether the data is for production or consumption for consistency (the underlined part of 4a indicates both production and consumption).**