



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

#### Fifty- third Session

#### San Diego, United States of America

29 November – 2 December 2022 and 8 December 2022

#### Comments of Nigeria

#### AGENDA ITEM 5

#### PROPOSED DRAFT 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 CX/FH 22/53/5

Nigeria appreciates the work done by the electronic working group (EWG) chaired by Chile and co-chaired by United States of America, France, and New Zealand for the development of this draft guidelines.

#### 11. Raw Beef Annex

##### •Question with respect to the raw beef annex:

Do you think it is relevant for the purpose of this document to add a "Post-Mortem inspection step" to this flow diagram between splitting and carcass washing?

**Nigeria supports the proposal to add "Post- Mortem inspection step" to the flow diagram between Splitting and Carcass washing.**

**RATIONALE:** Some systems are not automated and besides, Offals are delicacies in some countries.

#### 12. Fresh Leafy Vegetables Annex

- **Paragraph 10:** "[Once product is contaminated with STEC it is not possible to eliminate it and there are limited control measures that can be implemented to reduce it.]"

**Nigeria proposes the removal of the square bracket and that the sentence be retained.**

**RATIONALE:** If a site is contaminated with STEC, nothing can be done to eliminate it, so the site should not be used for primary cultivation.

- **Paragraph 15 :** [Growers should periodically test the water they use for appropriate indicator microorganisms and, where necessary, STEC,] according to the risk associated with the production."

**Nigeria proposes the removal of the square bracket and supports the proposal for periodic test.**

**RATIONALE:** Crucial to Safety

#### Questions with respect to the Fresh Leafy Vegetables Annex:

- Definition of Fresh Leafy Vegetables.

Do we need to consider other processes and say "for consumption without any further microbiocidal steps" instead of "for consumption without cooking"?

**Nigeria proposes the use in the definition "For consumption without any further Microbiocidal steps"**

**RATIONALE:** Microbiocidal is broad, and it encompasses other processes or steps that can eliminate microorganisms, such as cooking and steaming. It should not be limited to only “cooking”.

### 13. Raw Milk and Raw Milk Cheeses Annex

**Paragraph 1** [Consuming raw drinking milk without any control measures is associated with a higher risk of illness]. Raw milk cheeses are fermented products made from raw milk that are consumed in a variety of countries around the world. [Without any control measures, they are associated with a higher risk of foodborne illness than those cheeses made from milk subject to heating such as thermization or pasteurization to reduce the risk from foodborne pathogens].

**Nigeria supports the retention of the paragraph and proposes the removal of the square brackets.**

**RATIONALE:** This is a note of warning to let people be aware that drinking raw milk without any form of treatment/pasteurization will expose them to illness.

### 14. Sprouts

#### Question with respect to the Sprouts Annex:

- **In paragraph 48** there are several chemical treatments mentioned. Since scientific references will be deleted in a later step of the document, should we include the concentrations that were shown in the referenced studies to achieve the log reduction (after JEMRA validation)?

**Nigeria proposes not being specific in putting the concentration.**

- **In paragraph 49** there are several physical treatments mentioned. Do you think it would be useful to include examples (e.g., time and temperature) for each one of the treatments recommended (after JEMRA validation)?

**Nigeria proposes the inclusion of useful examples (e.g. time and temperature) for each of the treatment recommended by using the words “such as “.**

- Microgreens share characteristics with sprouts. They have the same initial process and steps, originate from similar seeds, and seed contamination will spread similarly. However, STEC outbreaks have not been associated with them to date. Should we include microgreens under the scope of this.

**Nigeria proposed that Microgreens be excluded from the scope of the annex for Sprouts**

**RATIONALE:** Microgreens have not been mentioned/defined in the guidelines, therefore bringing it in the scope will create ambiguity in the document.

## RECOMMENDATIONS

16. The EWG recommends that CCFH53:

- c. recommend whether the document can be advanced in the Codex Step process.

**Nigeria recommends that the document be advanced in the codex step process**

## AGENDA ITEM 6

### PROPOSED DRAFT GUIDELINES FOR THE SAFE USE AND REUSE OF WATER IN FOOD PRODUCTION AND PROCESSING CX/FH 22/53/6

Nigeria appreciates the work done by the electronic working group (EWG) chaired by Honduras and co-chaired by Chile and the European Union

## DEFINITIONS

- **13. Option 1:** [Water fit for purpose]: water that is determined to be safe for an intended purpose through an assessment of potential hazards, treatment options and their efficacy, control measures, history of use, and the end use of the food product.]

Option 2: [Water fit for purpose]: water which is determined to be

safe for an intended purpose through a water risk assessment.]

### **Nigeria proposes Option 1**

**RATIONALE:** The definition is simple and adequate

### **RECOMMENDATIONS**

a) Definitions in the General Section:

- Whether certain definitions should be retained in the document (e.g., HACCP system, food hygiene system) or rather insertion of a cross-reference to the appropriate Codex documents;

### **Nigeria supports the proposal to retain certain definitions in the documents**

**RATIONALE:** it makes reading and understanding the document easier and simple.

### **HARVEST and POST-HARVEST USE OF WATER**

- 30. It is recommended that the quality of the water used in packing establishments be controlled, monitored and recorded by testing for indicator organisms and/or food-borne pathogens. Since the results of such (verification) testing is not available right away, it is recommended to carry out simple complimentary operational monitoring such as rapid water quality testing by testing of turbidity, chlorine residuals or visual observation.

**Nigeria supports this recommendation and proposes the deletion of “OR” and the retention of “AND” in the paragraph to read (.....indicator organisms and food-borne pathogens. ....) and also proposes the last segment of the paragraph should read " chlorine residual AND visual observation " and not OR**

**RATIONALE:** All the tests should be carried out since they do not represent same thing.

### **USE**

#### **4. DEFINITIONS**

- [Fresh produce: Any fresh fruit, nuts, fungi and vegetables that are likely to be sold to consumers in a raw form, either unprocessed or minimally processed (e.g., washed, peeled, cut or otherwise physically altered from its original form but remaining in the fresh state), and that are generally considered as perishable regardless of it being intact or cut from root/stem at harvest.]

**Nigeria proposes a modification to the definition; Fresh Produce:** Any fresh fruit, nuts, fungi and vegetables that are likely to be sold to consumers in a raw form, either unprocessed or minimally processed (e.g., washed, peeled or cut) without altering its original state .

### **AGENDA ITEM 7**

#### **DISCUSSION PAPER ON THE REVISION OF GUIDELINES ON THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF PATHOGENIC VIBRIO SPECIES IN SEAFOOD(CXG 73-2010)**

Nigeria appreciates the work done by Japan and New Zealand in preparing this document and supports the new work.

### **AGENDA ITEM 8**

#### **DISCUSSION PAPER ON REVISION OF THE GUIDELINES ON THE APPLICATION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF VIRUSES IN FOOD (CXG 79-2012)**

Nigeria appreciates Canada and Netherlands for the work done in preparing this discussion paper and support the new work.