

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 5, 6, 7 and 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD HYGIENE
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Comments from Ghana

Agenda Item 5: Draft Guidance for the Management of Biological Foodborne Outbreaks (CX/FH22/52/5).

The guidance given on management of biological food borne outbreaks is acceptable. The document contains useful guidance for the management of biological food borne outbreaks. Ghana therefore supports the advancement of the guideline in the stepwise process.

Issue: Biological food borne outbreaks can have significant impact on health and socio-economic costs and hence the need to manage them. The management of foodborne outbreaks requires adequate preparedness system.

Position: Ghana supports the adoption of Proposed Draft Guidance on the Management of Biological Foodborne Outbreaks at step 8 for final adoption by CAC45.

Rationale: The amendments made to the Proposed Draft Guidance on the Management of Biological Foodborne Outbreaks document provides more clarity. Ghana therefore supports adoption at step 8.

Issue1: Introductory statement in paragraph 1:

There is ambiguity in the last sentence and hence the need to make it clearer.

Comments: Ghana proposes the amendment of the sentence to read as follows:

The contamination of food by **biological hazards** may occur at any stage in the process from primary production through to consumption and can result from the presence of zoonotic agents in animal production or from food handlers, environmental contamination, via equipment, water, soil, air and any other source.

Rationale: To clarify the scope to eliminate ambiguity that may arise from different users of the document.

Issue2: Introductory statement in paragraph 2:

Lack of clarity in the paragraph and hence the need to amend with some inclusions.

Position: Ghana proposes an amendment of the sentence to read as follows:

Biological food-borne illness is usually **asymptomatic and if it progresses to clinical disease it may take the form** of gastrointestinal symptoms; however, such illnesses can also have neurological, gynecological, immunological and other symptoms, including multi organ failure. The symptoms can be mild with recovery in days or have severe consequences for the individuals due to long-term sequelae with serious health effects or even death. **The outcome of food borne illness is dependent on the interaction of host factors such as immune suppression and agent factors such as pathogenicity and virulence.**

Rationale: Alignment of fact

Agenda Item 6: Proposed Draft Decision Tree (Revision of the General Principles of Food Hygiene (CXC 1-1969) CX/FH 22/52/6)

Ghana supports the revision of the General principles of food hygiene and supports its advancement in the

stepwise process.

Issue: The 51st Session of the Committee on Food Hygiene (CCFH51) advanced the revised General Principles of Food Hygiene (CXC 1-1969) to CAC43 for adoption at Step 5/8. CCFH51 further agreed to return the diagram of the decision tree for identification of critical control points (CCPs) to Step 2 for drafting.

Position: Ghana supports the inclusion of the CCP decision tree in the General Principles of Food Hygiene (CXC 1-1969). Ghana proposes the integration of "Example of a CCP Decision Tree" from Annex 1.

Rationale: The CCP decision tree is a very useful tool that helps to decide whether a hazard control point is a critical control point or not. It will be of great use to the operators during the hazard analysis, it is a logical method which is based on sequential answers to the questions to determine the CCPs. CCP Decision Tree will also assist professionals for a coherent determination of CCPs. The decision tree is appropriate and flexible enough to be used by different sectors of the food production chain.

Issue-para 18: To include either the CCP decision tree or CCP determination worksheet in the General Principles for food hygiene (CXC 1-1969).

Position: Ghana proposes the inclusion of CCP decision tree if only one alternative is envisaged. However, if possible both CCP decision tree and CCP determination worksheet should be included in the document.

Rationale: CCP Decision tree is clear and provides easy to use flexible guideline. On the other hand, CCP determination worksheet may be useful to some users who may have concerns on question 1.

Agenda Item 7: Proposed Draft Guidelines for Control of Shiga Toxin-Producing *Escherichia Coli* (STEC) in Beef, Raw Milk and Cheese Produced from Raw Milk, Leafy Vegetables and Sprouts (CX/FH 22/52/7)

Ghana commends the Chair and co-chairs for the work done so far on the 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. The document contains adequate guidance for the management of STEC in raw beef, fresh leafy vegetables, raw milk and raw-milk cheeses, and sprouts. Ghana therefore supports the advancement of the Guidelines in the stepwise process with the following comments:

Issue 1: Para.3, line 1.

Comments: the sentence beginning with, historically '*STEC illnesses*' should read "illnesses caused by STEC".

Rationale: Editorial to improve readability.

Issue 2: definition of raw beef Par. 21

Position: Ghana proposes amendment to the definition of raw beef to include meat from other species in line with international nomenclature.

Rationale: The current definition is restrictive and excludes meat from other species. Beef is a collective term for the product from many food animals e.g buffalo.

Issue 3: Para.43, word in bracket "primary"

Position: Retain the word 'primary' in the document but replace industry with food business operators (FBO).

Rationale: Food Business Operator (FBO) has already been defined and widely used in the General Principle of Food Hygiene document. Hence to ensure consistency, Ghana recommends the replacement of Food Industry with FBO.

Issue 4: Section 10.3.2, par. 45 regulatory systems: whether to use the word 'should' or 'could'.

Position: Ghana recommends the use of "should" rather than "could". The requirement should read *The competent authority **should**, provide guidelines and other implementation tools to industry, as appropriate, for the development of the process control systems.*

Rationale: The main role of the competent authority is to control and verify whether operators comply with the

requirements set by the competent authorities. This is supported by “General Principles of Food Hygiene” CXC 1-1969, which notes that: “*Competent Authority is the government authority or official body authorized by the government that is responsible for the setting of regulatory food safety requirements and/or for the organization of official controls including enforcement*”. Therefore, the competent authority should provide the industry with guidelines and other implementation tools allowing the establishment of process control systems.

Issue 5: page 34, par. 32- bracketed temperature of [7 °c or below]:

Comment: Delete the bracket and embed the temperature in the text.

Rationale: Temperature limit is important guidance for control of STEC.

Issue 6: General

Review the annexes with a view to providing overarching comments to facilitate their completion, in particular on

1. the completeness of Annex 1 on Raw Meat;
2. the definition of vegetables of a leafy nature,
3. retention of certain elements (e.g. Section 11 Retail and Food service and Flow charts) in Annex 2 on Fresh Leafy Vegetables; and on the structure of Annex 3 on Raw Milk and Raw Milk Cheeses

Position: Ghana supports the retention of Section 11: Retail and Food service and Flow charts in Annex 2 on Fresh Leafy Vegetables

Rationale:

1. **Section 11:** Retail and Food service and Flow charts in Annex 2 on Fresh Leafy Vegetables are useful and provide useful information and clarity.
2. The **flow chart** is useful for better understanding of all steps in the food chain (production, harvesting, packing, processing, storage, distribution, marketing and consumer use) and could contribute to the reduction of contamination of raw beef.
3. **Annex 1 on Raw Meat:** This Annex is well structured and provides useful information on measures that can reduce contamination of raw beef with STEC. It also contains guidance on when raw beef contaminated with STEC should be considered fit for human consumption.
4. **Annex 3. Raw Milk and Raw Milk Cheeses:** The technical content in this Annex is relevant, however, we recommend that the structure of the document is reviewed with the view to adopting using a structure similar to the one in the raw meat document.

Issue 7: Par 19.

The definition of Fresh leafy vegetables –

Vegetables of a leafy nature [where the leaf is intended for consumption] or [that may be consumed]

Position: Ghana supports the following definition: Vegetables of a leafy nature where the leaf is intended for consumption

Rationale: To remain in harmony with the scope of the " Code of Hygienic Practice for Fresh Fruits and Vegetables: CXC 53-2003 which specifies that: “Fresh leafy vegetables include all vegetables of a leafy nature where the leaf is intended for consumption “.

Issue 8: Paragraph 66 line 1, the use of the term vector

Position: Replace the term vector with vehicle

Rationale: Technically, vectors are biological organisms.

Agenda Item 8: Proposed Draft Guidelines for the Safe Use of Water in Food Production (CX/FH/22/52/8)

Water can be a vehicle for the transmission of many diseases or contamination. Water is an important input in the food chain and remains an essential commodity through all stages from primary production to consumption.

Whether used directly as an ingredient or indirectly (washing, cooling or cleaning contact surfaces), judicious use of safe and quality water is critical to ensure public health and sustainability of food production. It is in this regards that Ghana supports the use of risk-based approaches and assessment of the fitness of the water and the development of science-based microbiological criteria for water sourcing use and reuse.

Issue 1: para. 16- Use of the term 'potable' rather than 'drinking water' throughout the document.

Position: Ghana supports the use of 'potable water' throughout the document.

Rationale: Drinking water (according to WHO) is water that is used for direct consumption by a person, or for various usual domestic uses, in particular for drinking, for the preparation of meals and for personal hygiene. It does not include water used for food production. Potable water has a broader meaning given that it is based on its character of potability and without specifying its particular use. Potable water can mean, in addition to water intended for personal and domestic use, water used in the processing of food products.

Issue 2: To determine whether to keep paragraphs 5 to 36 adapted to the scope of these guidelines, or to replace by a cross-reference to CXC 53-2003.

Position: Ghana supports the retention of paragraphs 5 to 36.

Rationale: These paragraphs shed more light on the guidelines for water use depending on the pre-harvest and post-harvest stages. Moreover, where explanations can be found within the same document, it saves the user time of looking for extra documents which may also change due to amendments.

Issue 3: To evaluate the remaining examples and determine if the tools (Decision Tree) are appropriate for the development of the document.

Position: The examples given are relevant with the exception of the second one.

Rationale: The first and the third examples provide support tools to help decision-making depending on different criteria:

- **Example 1:** A decision tree, which consists of answering questions sequentially to classify the water and determine if it is suitable for its intended use and to decide if it is safe or unsafe
- **Example 2:** This is based more on analyses (one sample per source should be taken and analysed before use if more than 60 days have elapsed since the last analysis of the water source. Additional samples should be taken at least 18 hours apart and at least once a month while the water is in use.). And that example recommends the use of municipal water, potable water quality or reverse osmosis for any direct contact with edible portions of harvested crops, hand washing or use in food-contact surfaces
- **Example 3:** The table makes it possible to decide on the frequency of sampling and the microbiological criterion to be applied, as well as the relevance of the sources to be used according to the different types of fresh produce, the intended use and the source of the water. This example contains the conditions for using water other than potable water.

Issue 4: To indicate if it is considered appropriate to ask FAO / WHO if validation of the examples can be considered, as well as more concrete recommendations on thresholds and sampling frequencies.

Position: Ghana is of the opinion that it is not necessary at this time to ask FAO / WHO to validate the examples, as well as recommendations on thresholds and frequencies.

Rationale: The examples given are sufficient and clear and GHP are best suited for the prevention of STEC. Good hygiene practices (GHP) are sufficient at this stage of production to control STECs. In addition, the microbiological analyses relating to STEC carried out on fresh leafy vegetables and water during primary production are currently of limited use due to the difficulty in detecting STECs due to the low prevalence and quantity of organisms in fresh leafy vegetables and water.

Issue 5: To choose the most appropriate definitions for fishery products, harvesting and fit for purpose water, from the proposed definitions in section 4.

Position: Ghana supports the following definition: 'Any cold-blooded aquatic animal, or any part or product derived therefrom, intended for food for human consumption, and includes any fish, crustacean, molluscs,

echinoderm, holothurian, or aquatic reptile.

Rationale: This definition captures all the products considered as fishery products in international trade as defined by FAO.

Issue 6: Request to choose the most appropriate definitions for 'harvesting'

Position: Ghana supports the following definition for harvesting i.e. Operations involving taking the fish from the water.

Rationale: The harvesting is a first step before the landing of the fishery products. These are two distinct steps and each of them has specific requirements to be observed. In addition, this definition is also consistent with the definition used in the Code of Practice for Fish and Fishery Product CC 52-2003 in Page 14, 2.1 General definitions, specifies that "*Harvesting Operations involves taking the fish from the water*".

Issue 7: To choose the most appropriate definitions for 'fit for purpose water'

Position: Ghana supports the following definition for "Fit for purpose water" i.e. Water of such quality, that once it has been in direct or indirect contact with the fishery products (during cleaning, storage, transport, processing; cleaning of utensils, facilities, equipment; as well as for its use in the hygiene for the personnel in contact with food), it will not confer any hazard to the health of consumers.

Rationale: The first definition provides a clear description in relation to food safety. It specifies water use which may include direct and indirect contact with the fishery products. It also details the various steps involved, namely: during cleaning, storage, transport, processing; cleaning of utensils, installations, equipment; as well as for its use in the hygiene of people in contact with food. The second definition for "Fit for purpose water" is not preferred because it deals with the aspects related to the effects on the water manipulator, as well as the direct effect of personnel which is not the subject of the document.

Issue 8: To consider if the information provided in the annex so far is enough or to hold the document until the JEMRA meeting on water use and reuse for fish and fishery products becomes available to include further information.

Position: Ghana is of the opinion that the information provided is not sufficient and it is best to seek the advice of JEMRA. This should, however, not hold the progress of the document in stepwise process.

Rationale: The information provided is insufficient and contains certain ambiguities that may require further clarification by JEMRA meeting on water use and reuse for fish and fishery products once available. Given the stage of the document, improvements may still be made in subsequent stages when new information is received.