

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 6, 7 and 8

CRD21

Original language only

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD HYGIENE
Fifty-second Session
Virtual
28 February – 4 March and 9 March 2022
Comments from Saudi Arabia**

The kingdom of Saudi Arabia would like to thank Committees of Food Hygiene for their efforts. Saudi Arabia would like to highlight the comments on agenda item 5, 6, 7 & 8.

AGENDA ITEM 5: Draft guidance for the management of biological foodborne outbreaks at Step 7.

Specific Comment- Definition Part:

Saudi Arabia suggests providing a definition for "Risk Assessor" as the following:

"Evaluating risks associated with the food chain requires collecting information and analyses existing research and data to provide scientific advice considering the uncertainties in risk estimates, and when appropriate, alternative interpretations of the available data that may be scientifically plausible to support decision-making by risk managers without generating new scientific research or having scientific laboratories."

Specific Comment- Annex II " Rapid risk assessment - Examples of questions to be clarified / risk to be assessed

":

Saudi Arabia suggests identifying competencies, experience and other requirements to qualify as a Risk Assessor, and these criteria considerations should be within the jurisdiction of the local competent authority.

AGENDA ITEM 6: Proposed draft Decision Tree (revision of the General Principles of Food Hygiene (CXC 1-1969) at Step 4.

Saudi Arabia finds the decision tree and the CCP identification worksheet suitable for inclusion in the revised General Principles for Food Hygiene (CXC 1-1969).

AGENDA ITEM 7: 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 at Step 4.

Specific Comment- Annex II" Definition of vegetables of a leafy nature" :

Saudi Arabia agrees with the phrase [that may be consumed] within the definition of vegetables of a leafy nature.

Specific Comment- Annex II" Definitions of Indicator microorganisms":

Saudi Arabia agrees with the phrase [microorganisms that are used to evaluate the microbiological status of food production and food control systems, including the evaluation of the quality or safety of raw or processed food products and the validation of the efficacy of microbiological control measures. Some hygiene indicator microorganisms are total bacterial counts, coliform or faecal coliform counts, total E. coli counts and counts of Enterobacteriaceae] within the definition of Indicator microorganisms.

Specific Comment- Appendix II- 10.3.1 - paragraph 43:

Saudi Arabia agrees with keeping the term "primary" as the Industry has the responsibility of the safety and suitability for raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts.

Specific Comment- Appendix II- 10.3.2 paragraph 45:

Saudi Arabia agrees with the word "should" because the competent authority has to provide the guidelines to

industries.

AGENDA ITEM 8: Proposed draft Guidelines for the safe use and re-use of water in food production at Step 4.

Specific Comment- Appendix I: The General Section and the annexes on Fresh Produce and Fishery Sector – Definitions:

Saudi Arabia agrees with the co-Chairs on using the term “potable water”, since it is widely used in other Codex texts and have been previously defined.

Specific Comment- Fresh Produce annex- paragraphs 5 to 36:

Saudi Arabia suggests that paragraphs 5 to 36 “pre/post-harvest use of water” are replaced by a cross-reference to CXC 53-2003 as the Pre/Post-harvest use of water have been mentioned already in another codex standard (CXC 53-2003) and not within an outside reference.

Specific Comment- Fresh Produce annex- tools (DT):

Saudi Arabia agrees with Decision Tree tool and believes it is appropriate for the development of the document.

Specific Comment - Fishery Products annex- Definitions:

Saudi Arabia find that the first suggested definitions of the Fishery products, Harvesting, and Fit for purpose water more appropriate.

Fishery products: Any species of fish, including crustaceans, molluscs, gastropods, or part of them intended for human consumption."

Harvesting: Operations involving taking the fish from the water.

Fit for purpose water: 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 personal in contact with food), it will not confer any hazard to the health of consumers.

Saudi Arabia appreciates the opportunity offered to submit this Conference Room Document, looking forward to discussing the Intermediate draft at the upcoming plenary session of the Commission.