



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD HYGIENE

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Comments of Ghana

AGENDA ITEM 5

CX/FH 25/55/5

Guidelines for the safe use and reuse of water in food production and processing (CXG 100-2023): Proposed draft Annex II on Fish and fishery products and Annex IV on Water fit-for-purpose assessment, safety management, and technologies for recovery and treatment of water for reuse (Step 4)

1. Paragraph 18, paragraph 11,

Position: Ghana recommends maintaining paragraph 11

Rationale: It serves as a reminder of the concept of water fit-for-purpose drinking water and clean water, and it also clarifies the possible uses of each category of water.

2. Annex I - DRAFT ANNEX II ON FISH AND FISHERIES PRODUCTS (Fish and fishery products)

Position: Ghana supports option 1 of section 6.1, para 21-26

Rationale: Option 1 is well organised and gives the details of the various links in the sector that are concerned with water use, namely:

- a) Water use for aquaculture production
- b) Water usage on board ships
- c) Water use in onshore processing facilities

3. **Position:** Ghana supports option 1 in Figure 4.

Rationale:

- Option 1 accurately addresses the different stages of the fishery product processing, as well as the decisions to be made for each stage, depending on the different categories of water used.
- Option 1 also explicitly presents the two expected conclusions, namely: FFP or not FFP.

4. Section 4.0 Definitions - Para 11

Position: Ghana supports the text provided. However, Ghana proposes to assign a title to the paragraph, e.g. "Fit-for-Purpose Water Requirements in Food Production" OR "Concept of water fit-for-purpose." The highlighted text sounds out of place.

Rationale: To improve navigation within the guidelines. and to understand the concepts related to the quality and suitability of water used in food production and processing.

5. Section 6.1 - Water Use

Position: Ghana recommends retention of option 1.

Rationale: It considers the fact that in the fish industry, water is used in many ways, and different uses may require different water quality fit for that purpose. The section further considers the fact that real-world operations may lack potable water, and therefore, risk assessment is needed only for uncertain water sources.

AGENDA ITEM 6

CX/FH 25/55/6

Alignment of Codex texts developed by CCFH with the revised General principles of food hygiene (CXC 1-1969)

1. General recommendation

Position: Ghana notes the progress made by the EWG on alignment and endorses the alignment approach and recommends extension of the EWG mandate.

Rationale: The progress aligns with the mandate of the EWG, and the extended mandate will give adequate time to complete work on pending and emerging issues.

2. Appendix I, II

Position: Ghana proposes the inclusion of the Alignments made on the different sections

Rationale: These are mainly cross-references that seek to enhance the use.

AGENDA ITEM 7

CX/FH 25/55/7

Proposed draft revision of the Guidelines on the application of general principles of food hygiene to the control of viruses in food (CXG 79-2012) (Step 4)

1. General comments

Position: Ghana suggest replacement in the document, the term "water fit-for-purpose" with drinking water, clean water, or " water fit-for-purpose"

The paragraphs to be modified include: 20, 26, 55, 61, & 91. Otherwise, do not describe its quality (keep only the term (WATER)). Consulting the CXG 100-2023 directive provides all the necessary guidance.

Rationale: The use of the term " fit-for-purpose" automatically as a replacement for the term "clean water" throughout the document does not correspond to the spirit, orientation and philosophy of the CXG 100-2023 guidelines.

Bivalve molluscs are produced in clean water

2. Appendix 1- Section 8.2: Hygienic production - Para 26

Position: Delete " water fit-for-purpose should be used during harvesting and post-harvest processing of food."

Replace with " clean water should be used during harvesting and post-harvest processing of food."

Rationale: For the primary production of bivalve molluscs, clean water is used without the need for a risk assessment. Clean water is used during re-carrying and purification as a possible control measure for enteric viruses, such as norovirus and HAV and in aquaculture too, on board fishing vessels.

3. Appendix 1: Section 12.2: Illness and injuries - Paragraph 74

Position: Ghana recommends a time of 48 hours

Rationale: It gives a restrictive deadline

4. Appendix 1: Section 12.3: Personal cleanliness - Paragraph 82

Position: Ghana proposes to delete the sentence,

"It has been shown that conventional household detergents have a good virucidal effect at 40 °C."

Rationale: This generalisation may not be true for all commercially available detergents.

5. Appendix 1: Section 6: Definition - Paragraph 19

Position: Ghana recommends Option 1 as the preferred definition of frozen produce

Rationale: Indication of -18°C or lower temperature necessary for microbial safety and quality aligns with CAC/RM 35-1970, Codex Standard for Quick Frozen Fruits and Vegetables, and ensures harmonisation with global trade.

Enforcement is a reality with allowance for minor deviation in stated temperature.

6. Appendix 1: Section 9.1 Facilities - Para 40

Position: Ghana suggests deleting the soap indicated in the bracket

Rationale: A hand cleanser is any product used to clean or sanitise the hands, typically to remove dirt, germs, or contaminants. These can be soap or other detergent based cleansers.

7. Annex II - Section 6 para 12

Position: Ghana suggests repeating the definitions of fresh and frozen produce indicated in the General section.

Rationale: It allows for uniformity in definitions and easy understanding of the terminology

8. Annex III - Introduction para 1

Position: Ghana proposes including a sentence for. Whereas genotypes 3 and 4 infections are predominant in industrialised countries, in developing and low-income countries, HEV genotypes 1 and 2 infections commonly occur through contaminated sewage water.

Rationale: Although genotypes 1 and 2 are not directly foodborne, they provide clarity on the presence of HEV infection in less developed countries.

9. Annex III: Section 16-19

Position: Ghana recommends reviewing the aspects of HACCP and making a general statement on HACCP. Same to similar sections on pages 26 and 30.

Rationale: Having a section on HACCP, which is a duplication and full cross-referencing of CXC 1-1969, adds no value to this document.

AGENDA ITEM 8

CX/FH 25/55/8

Proposed draft revision of the Guidelines for the control of *Campylobacter* and *Salmonella* in chicken meat (CXG 78-2011) (Step 4)

General comments

Ghana appreciates the United States, Australia, Brazil, Denmark, Honduras and India for coordinating the electronic working group, and FAO /WHO for the recent scientific advice that guided this review. The document is well structured and reflects the latest developments of JEMRA.

1. Section 9.6: Subheading Food service (Step 6.4)

Position: Ghana suggest Revise Food service (b) "Thawing of frozen chicken should be carried out in a manner that minimises the potential for growth of microorganisms and prevents cross-contamination (e.g., refrigerator thawing at $\leq 5^{\circ}\text{C}$, sealed cold-water submersion with water changed frequently, or microwave defrost followed by immediate cooking; room-temperature thawing should be avoided)

Rationale: It adds a quantitative time–temperature criterion for thawing, strengthening the linkage with recent scientific evidence (FAO/WHO JEMRA 2023; CDC/USDA FSIS 2024)

2. Section 9.6: Subheading Food service (Step 6.4)

Position: Delete text (f) "Products should be stored and transported at temperatures that prevent the growth of *Campylobacter* and *Salmonella* and in a manner that prevents cross-contamination with other foods and surfaces. Home delivery services should consider safe storage and transportation where space may be limited, and refrigeration may not be available".

Replace text (f) with

"Products should be stored and transported at temperatures that prevent growth of *Campylobacter* and *Salmonella* (chilled $\leq 5^{\circ}\text{C}$; frozen $\leq -18^{\circ}\text{C}$; hot-held $\geq 60^{\circ}\text{C}$) and in a manner that prevents cross-contamination with other foods and surfaces. Where home-delivery or meal-kit services are used, validated insulated packaging and coolant systems should maintain these temperatures throughout transit, with clear segregation between raw and ready-to-eat foods".

Rationale: This helps to integrate modern delivery and packaging guidance (FAO/WHO JEMRA 2023; CDC 2023).

Proposed draft revision of the Guidelines on the application of general principles of food hygiene to the control of *Listeria monocytogenes* in foods (CXG 61-2007) (Step 4)

1. Section 6 para 27

Position: Modify the definition of RTE,

“Ready-to-eat (RTE) food means any food (raw or processed) that is normally eaten without further listericidal treatment, or for which it is reasonably foreseeable, based on evidence of consumer habits or practices, that it will be eaten without such treatment”.

Rationale: It aligns with CXC 1-1969 and CXG 21-1997 language on food intended for direct consumption and clarifies “reasonably foreseeable” based on observed consumer behaviour

2. Annex 1- Para 7

Position: Ghana suggests the inclusion of text,

“Using *Listeria spp.* as an indicator increases sensitivity because non-pathogenic species are often more prevalent and share ecological niches with *L. monocytogenes*. However, only testing of *L. monocytogenes* can verify that the pathogen itself is under control.”

Rationale: It provides clarity on the potential of false positive detection of *L. monocytogenes*.

References:

- FAO/WHO JEMRA (2023) — Recommends *Listeria spp.* as an early-warning indicator.
- ISO 11290-1 (2017) — Distinguishes between species identification and pathogen confirmation.
- Weis and Seeliger (1975). Classic ecology study confirming shared habitat among *Listeria* species

3. **Position:** Ghana suggests adding specific cross-references (section/standard numbers) and not just referencing the CXC 1-1969 document in its entirety.

Rationale: To allow easy and guided access to the requested section and to avoid ambiguities of interpretation.

4. **Position:** Ghana recommends that the document's content be reviewed to remove repetitions and redundancies to make the document easy to use.

Rationale: Some sections are repeated.

- Repetition of general principles already present in CXC 1-1969. The paragraphs between the two sections are the same.

5. **Position:** Ghana suggest that the document's scientific information be enhanced with thresholds and model parameters (pH, Aw, temperature, shelf life, etc.)

Rationale: JEMRA has identified in its work several critical parameters for the growth thresholds of *Listeria monocytogenes*, which it is recommended to integrate to enrich the document and make it easier for the user to say whether an RTE allows proliferation or not.

A. Temperature (T°)

- *L. monocytogenes* can multiply at 0–1°C
- Optimal growth: 30–37°C

B. pH

- pH Minimum growth rate: 4.4
- pH optimum: 6 to 7

C. Water activity (Aw)

- Aw Minimum growth rate: 0.92
- Aw < 0.92 = impossible growth

D. Shelf life

- The longer the duration, the greater the risk.
- JEMRA offers models that consider the actual temperature of the business.

E. Formulation parameters influencing growth:

- NaCl (sodium chloride)
- CO₂ in packaging
- acidification
- fermentation

6. Section 10

Position: Ghana proposes considering the role of the competent authority in this section, where feasible.

Rationale: Although it talks about competence, it is totally silent on what the competent authority can do as part of the value chain regulators.

7. Section 16

Position: Ghana suggests merging the entire section into a simple text as follows: For Hazard Analysis and Critical Control Point (HACCP) system and guidelines for its application, refer to the General principles of food hygiene (CXC 1-1969).

Rationale: There is no value added by having many clauses referring to the General principles of food hygiene (CXC 1-1969). One sentence is adequate to guide the user.