



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD HYGIENE
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Comments of the African Union (AU)

AGENDA ITEM 5

CX/FH 25/55/5

Agenda 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) (CX/FH 25/55/5)

African Union (AU) thanks the Electronic Working Group chaired by the EU, co-chaired by Honduras, India, Mauritania, Morocco, and the International Dairy Federation (IDF) for preparing these Guidelines.

Paragraph 11

Position: The African Union supports the retention of paragraph 11.

Justification: This paragraph provides critical clarification on the various water sources applicable in fish and fishery production. It effectively reiterates the distinction between potable and clean water and highlights their appropriate uses. This distinction is central to the fit-for-purpose approach and should be retained to preserve the clarity of water categorization within the guidelines.

Annex II – Section 6.1 (Paragraphs 21–26)

Position: The African Union supports Option 1 for Section 6.1 on water use.

Justification: Option 1 offers a comprehensive and structured reflection of the distinct stages in the fish value chain, namely aquaculture production, onboard vessel operations, and land-based processing. Unlike Option 2, which omits key upstream activities such as aquaculture, Option 1 provides a practical and detailed roadmap for managing water use across the continuum of fish and fishery operations. This enhances applicability for developing country contexts where multiple water sources are used under variable infrastructure constraints.

Annex II – Figure 4 (Decision Tree for Post-Harvest Water Use)

Position: The African Union favors Option 1 of Figure 4.

Justification: Option 1 clearly delineates the water decision-making process at each stage of post-harvest handling. It presents a robust logic model that supports decision-making based on risk categories and water quality requirements. Moreover, it includes explicit conclusions i.e., whether water is “Fit-for-Purpose (FFP)” or “Not FFP” thus increasing clarity and usability for national competent authorities and processors alike.

Annex II – Figure 2 (Decision Tree for Fit-for-Purpose Assessment)

Comment 1: The AU proposes to relocate the “Yes” arrow from Q4 to Q5, pointing towards “Complying with Regulations.”

Justification: Logically, the statement on regulatory compliance better aligns with the decision question in Q5 rather than Q4. Adjusting the flowchart enhances coherence and prevents misinterpretation of the regulatory decision point.

Comment 2: The AU recommends the removal of “deep groundwater” from the “medium-risk” water source box.

Justification: This classification appears inconsistent with the rest of the document, which recognizes deep groundwater as a clean, low-risk water source when properly managed. Including it as a medium-risk water undermines its appropriate classification and could misguide assessments.

Annex II – Figure 3 (Decision Tree for Aquaculture Water Use)

Comment: The AU recommends the inclusion of a legend and guidance on figure interpretation for Figure 3.

Justification: Adding a legend for abbreviations and a brief explanation on how to read the decision tree will significantly enhance user comprehension, especially for first-time users or non-specialists in small-scale aquaculture environments.

Advancement of Annexes II and IV to Step Process

Position: The AU supports the advancement of Annexes II and IV in the Codex step process, in view of consideration of comments above.

Justification: Both annexes have benefitted from broad consultation and contain sufficiently developed technical content. Advancing them in the stepwise procedure reflects readiness for further Member State input while maintaining momentum for adoption.

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 (CX/FH 25/55/7)

African Union thanks the Electronic Working Group chaired Canada, co-chaired by the Netherlands for preparing this document.

General Recommendation: Use of the Term “Water Fit-for-Purpose”

Comment: The AU recommends a consistent and precise use of terminology throughout the document regarding water. Specifically, the AU proposes that the term “**water fit-for-purpose**” should not be used as a blanket replacement for “**drinking water**”, “**clean water**”, or other established terms.

The following paragraphs should be revised accordingly: Paragraphs 20, 26, 55, 61, 91. In these cases, either retain the original term (e.g., clean water or drinking water) or refer to water more generically as “water” without describing its specific quality, and refer readers to CXG 100-2023 for further detail.

Justification: The current use of “fit-for-purpose water” as a general substitute for “clean water” or “drinking water” deviates from the intent of CXG 100-2023, which provides distinct definitions and use scenarios for different categories of water. Bivalve molluscs, for instance, are produced in clean water, and the document should reflect this with appropriate terminology. Misuse of the term may result in confusion and incorrect application of risk assessment protocols.

AGENDA ITEM 8

CX/FH 25/55/8

Agenda Item 8: Proposed Draft Revision of the Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CXG 78-2011) CX/FH 25/55/8

African Union thanks the Electronic Working Group chaired by the United States of America, co-chaired by Australia, Brazil, Denmark, Honduras, and India for preparing this document. The AU supports progression of the draft to the next stage, subject to the incorporation of the following revisions.

Specific Comments and Justifications

Terminology – “Herd” Definition

Position: Harmonize the definition of “herd” using either the Codex (production unit) or WHO (epidemiological unit) approach.

Justification: A hybrid definition can create confusion during compliance monitoring or equivalence audits. WOH already defines “herd” as an epidemiological unit.

Outdoor and Extensive Livestock Systems

Position: Develop further guidance specific to extensive systems or propose a separate annex.

Justification: The document’s scope now includes outdoor systems, but lacks practical recommendations for many African settings.

Chicken Liver

Comments: AU proposes that chicken liver risks be addressed more explicitly, given that liver is a documented source of campylobacteriosis in several countries.

AGENDA ITEM 9**CX/FH 25/55/9****Agenda Item 9: 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) (CX/FH 25/55/9)**

African Union thanks the Electronic Working Group chaired by the United States of America, co-chaired by Canada, France, and China for preparing this document. Below are specific Comments and Positions of the AU.

Section 6, Paragraph 27 – Definition of Ready-to-Eat (RTE) Food

Comment: AU proposes revising the definition of “ready-to-eat (RTE) food” to read:

“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.”

Justification: This aligns the definition with terminology used in CXC 1-1969 and CXG 21-1997 regarding food intended for direct consumption. And therefore, enhances clarity of “reasonably foreseeable” by linking it to consumer behaviour evidence, supporting risk-based controls and enforcement decisions.

Annex 1, Paragraph 3 – Biofilm Formation and Harborage Sites

Position: The African Union expresses strong support for the inclusion of the proposed text that emphasizes the persistence of *Listeria monocytogenes* in forming multispecies biofilms.

Justification: The statement that “*L. monocytogenes forms persistent multispecies biofilms, surviving for months to years on equipment and in niche areas even under routine sanitation...*” is an essential addition, as it substantiates the proposed recommendation to focus attention on harborage sites and on environmental conditions that favour biofilm development. This is backed by the 2023 FAO/WHO JEMRA report which document the significant role of biofilms in facilitating *Listeria* persistence and re-contamination.

Annex 1, Paragraph 7 – Use of *Listeria* spp. as Indicator Organisms

Comment: The African Union recommends the addition of text clarifying the use of *Listeria* spp. as indicators. Specifically, it is proposed to state: “*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.*”

Justification: This proposed addition enhances the scientific precision of the document by addressing the limitations and proper interpretation of indicator testing. It also cautions against over-reliance on non-pathogenic *Listeria* species, which may merely indicate shared habitat rather than actual pathogenic contamination. This clarification is consistent with the FAO/WHO JEMRA (2023) recommendation, ISO 11290-1 (2017), and earlier ecological studies such as Weis and Seeliger (1975).

Section 16 – HACCP References

The African Union proposes simplifying Section 16 to a single, clear reference: “**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).**” The current version contains multiple clause-level references to CXC 1-1969, which creates repetition and adds no substantive value.