

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5, 6, 7, 8, 9

CRD24

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fifth Session

Nashville, Tennessee, United States of America

15 - 19 December 2025

Comments of Cabo Verde

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

POSITION OR COMMENT

- i) Cabo Verde supports the paragraph 11;
- ii) Cabo Verde supports Option 1 for section 6.1.;
- iii) Section 7, Paragraphs 26–28 of Annex II - Cabo Verde notes the emphasis placed on “water intended for reuse”, particularly the encouragement to consider alternative water sources, including water from industrial or agricultural processes, provided that appropriate risk assessment and adequate treatment are applied;
- iv) Cabo Verde expresses preference for Option 2 of Figure 4.

RATIONALE

- i) Clarifies the appropriate use;
- ii) This option offers a more complete presentation of water-related considerations across different stages of the fish and fisheries sector;
- iii) This is of strategic importance for Cabo Verde, a country with limited freshwater resources. Safe water reuse supports food safety, reduces production costs, and promotes alignment with FAO/WHO international standards, thereby contributing to trade facilitation and sustainability;
- iv) Option 2 offers a simpler structure and is easier to interpret.

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)

POSITION OR COMMENT

- i) Alignment approach: Cabo Verde thanks the EWG for the work undertaken and supports the overall alignment approach with the GPFH (CXC 1-1969). We agree with the alignment approach. To facilitate the analysis of the aligned text and to support Members who did not participate in the discussions, Cabo Verde suggests, as an example, the optional use of temporary left-margin indicators during the review phase only, to show the origin of each aligned paragraph relative to the original guideline.
- ii) Appendix I, Objectives, Paragraph 2: Cabo Verde considers relevant the reference to “equivalence determinations by importing countries”, as this provision is essential to ensure that national control measures are internationally recognized and do not become unjustified barriers to trade.

iii) Comments on the questions presented in Annex IV: Q1 – Cabo Verde supports the inclusion of the front-page statement; Q2 – Cabo Verde supports the provision of a Table of Contents to improve usability; Q3 – Cabo Verde supports updating all abbreviations in line with Codex conventions, incorporating the correction noted; Q4 – Cabo Verde supports replacing all references to “OIE” with “WOAH”; Q5 – Cabo Verde agrees that all hyperlinks should be updated at this stage; otherwise, the review would not be complete; Q6 – Cabo Verde notes that the introduction already specifies that the guideline is to be applied together with the GPFH. In this context, Cabo Verde brings for the Committee’s consideration whether the number of cross-references to individual GPFH sections is needed throughout the text, except where such references provide essential technical value. Cabo Verde would support retaining only those cross-references that are clearly justified and limited in number. Cabo Verde also brings for analysis the extent to which structural alignment should replicate all headings of the GPFH, noting that full replication may not always be feasible or necessary. Alignment remains important, but it may be useful to clarify that the guidelines are not intended to replace the GPFH, but to provide more specific guidance on their respective subject areas; Q7 – Cabo Verde supports maintaining a stand-alone subsection, as the topic is important for this guideline. Integrating the content into another subsection could make it more difficult for readers to recognize its importance; Q8 – Cabo Verde agrees that non-sequential numbering should not be used; Q9 – If references to the GPFH are considered necessary, Cabo Verde supports a flexible approach in which section-level references are the default, with subsection-level references used only where they add clarity; Q10 – Cabo Verde supports adopting the hybrid approach, citing definitions explicitly when drawn from other Codex texts; Q11 – Cabo Verde considers that if the essential cross-references are already identified and are not too numerous, they may be included at this stage; otherwise, the document would not be considered fully reviewed.

iv) Continuation of work: Cabo Verde supports the implementation of the proposed plan for the continuation of the alignment work.

RATIONALE

i) These indicators could assist in understanding the reorganization of the text. They are intended solely for the revision process and should not be retained in the final adopted document.

ii) The alignment of these guidelines with the General Principles of Food Hygiene (CXC 1-1969) will strengthen Cabo Verde’s integration into regional and multilateral initiatives, including AfCFTA, where the equivalence of sanitary measures is crucial for facilitating trade liberalization.

iii) Cabo Verde considers that these options support the implementation of the alignment of the guidelines with the General Principles of Food Hygiene.

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)

POSITION OR COMMENT

i) Paragraph 8, “Participation and Methodology” – bullet point on water terminology (“clean water” vs. “water fit for purpose”): Cabo Verde supports retaining the term “water fit for purpose”, as reflected in the discussion.

ii) Paragraph 19: We support Option 1

RATIONALE

i) The safe use of treated or recycled water is fundamental for sustainable food production and for maintaining the competitiveness of exports from countries facing water scarcity.

ii) This definition provides greater clarity.

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)

POSITION OR COMMENT

i) Section “Objectives”: Cabo Verde supports the central objective of the guidelines: reducing foodborne diseases while ensuring fair practices in international trade.

RATIONALE

i) This approach: strengthens national public health protection; prevents sanitary measures from becoming unnecessary trade barriers; aligns Cabo Verde with internationally recognized food safety standards.

AGENDA ITEM 9**CX/FH 25/55/9****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)****POSITION OR COMMENT**

i) Paragraph 37: Cabo Verde highlights the importance of recognizing the influence of seasonality, production practices and climate change on *Listeria monocytogenes* contamination.

RATIONALE

i) As an island and climate-vulnerable country relying on small-scale agriculture and fisheries, Cabo Verde faces heightened risks associated with environmental variability. It is essential that international guidelines acknowledge and integrate these specific conditions to support effective implementation in Small Island Developing States.