

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5 and 7

CRD19

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 United Kingdom

Agenda Item 5

DRAFT GUIDANCE ON THE MANAGEMENT OF BIOLOGICAL FOODBORNE OUTBREAKS

General Comments

The UK welcomes the work carried out by the Chairs of the EWG and believe that the document is ready to advance to step 8 and adoption by CAC45. The development of CRD02 has raised some small editorial suggestions from the UK for consideration ahead of plenary discussions to simplify and improve overall clarity.

This work is integral to efforts to ensure that all competent authorities are prepared and ready to manage foodborne outbreaks. The UK Global Food Safety Incidents and Emergency Response Conference in October 2021, undertaken in close collaboration with INFOSAN and Codex, promoted the bringing together of INFOSAN and Codex to encourage greater consistency in food safety practices across countries to improve standards and protect consumers.

The UK recognises the importance of INFOSAN and welcomes its reference in the draft Guidance as a mechanism for communication and co-ordination of information between countries, and for collaboration and sharing of experience and risk messages.

The UK continues to invest in INFOSAN, using it as the main mechanism for food safety notifications and engagement with other countries to track sources of infection when foodborne outbreaks have occurred and the UK encourages others to do the same.

The UK wishes to draw delegates attention to related work in CCFICS to review the *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006) given the central role of traceability systems for incident management.

Specific Comments on CRD02

The UK would like to make the following small editorial suggestions to simplify and improve overall clarity. Where proposed edits have been made by the UK these are in **bold underlined text**. The red text reflects the latest amendments made by the chairs in CRD02:

Paragraph 8: “Within the available analytical methods, molecular methods often best contribute to the detection of clusters of human cases and allow them to be linked to the food source when used in conjunction with epidemiological analysis. They also help to better identify **batches/**lots of food involved and the root cause; hence reducing the exposure of humans to hazards.”

Rationale: The definition of ‘lot’ in paragraph 22 already says that ‘lot’ can be referred to as ‘batch’. We therefore suggest that the defined term is used throughout the document. Consequential deletion would also be needed in paragraph 64, first bullet and Annex III – ‘investigations in food’, first bullet.

Paragraph 22: Delete the final sentence in the definition of ‘Lot’ - “**In an outbreak situation a lot has to be separated by procedures avoiding risk of cross-contamination.**”

Rationale: the final added sentence goes beyond a definition and into potential preventive action during an outbreak.

Paragraph 64: The last sentence of paragraph 64 should be amended to read “Information to be **requested** should include:”.

Also amend the final parentheses to read “(Note that for some foodborne illnesses such as listeriosis, **cases may not recall detailed information on food items, since food causing the illness may not have been consumed recently.**)

Rationale: Amendments to simplify and improve clarity.

Paragraph 66: “Other tools that can be used for hypothesis generation to determine the source **of the outbreak attribution** in case of a foodborne outbreak include review of surveillance data, or prior sample matches, source attribution studies, historical outbreak data and mathematical modelling.”.

Rationale: Deletion to aid overall clarity

Paragraph 69: “When taking a sample, information on the product should include at least product name, comprehensive product description (e.g. animal/fish species, kind of vegetable, fresh, processed, frozen, canned), lot identification, place and date of sampling, **type of packaging, required and actual storage conditions (e.g. refrigeration required but stored at room temperature, refrigeration and type of packaging),** in order to allow further investigations including tracing.”.

Rationale: The inclusion of the reference to storage conditions is useful, however the purpose of the text in parentheses isn't clear. If the intent is to give an example, the amendments above are suggested for clarity.

Paragraph 80, fourth bullet point: “the affected lot of food was consumed or removed at the end of its shelf life and therefore no longer available for testing. This may happen when a **pathogen hazard e.g. Listeria monocytogenes** causes illness with a long incubation in humans or the food source has a very limited shelf life (e.g. fresh produce).”.

Rationale: Adding the example of *Listeria monocytogenes* links back to the mention of listeriosis in paragraph 64.

Paragraph 87, second bullet point: ~~“If more languages are used in a specific area (e.g. official national language and official local dialect/language) the information should be available in all the relevant languages.”.~~

Information should be made available in all relevant languages (e.g. official languages, local dialects or other commonly used languages) subject to local language policy. Where communicated, key points should be simple and in plain language since the public may have limited familiarity with scientific terms.

Rationale: Alternative text proposed for clarity. In the UK, there are statutory requirements to translate documents into other official languages, but there are specific caveats around the types of documents that require translation.

Agenda Item 7

PROPOSED DRAFT GUIDELINES FOR THE CONTROL OF STEC IN RAW BEEF, FRESH LEAFY VEGETABLES, RAW MILK AND RAW MILK CHEESES AND SPROUTS.

The UK welcomes the work carried out by the Chairs of the EWG. Comments are outlined below for consideration.

General Comments on CRD04

In relation to the recommendations in Paragraph 12 of CRD04 the UK:

- i. agrees with the rationale provided in paragraph 10 of CX/FH 22/52/7 to delete terms such as “GHP-based” and “hazard-based” control measures.
- ii. considers that the revised definitions are appropriate.
- iii. considers that the definitions should be retained in both the general section and the specific commodity annexes.

It is suggested that once consensus is reached on the definition of ‘indicator microorganism’ in paragraph 20 and on the amendments to paragraph 49 of the ‘general section’, Annexes should be reviewed for consistency of terminology as consequential changes may be required for example in Annex I, paragraph 79.

Specific Comments on General Section – CRD04

Where proposed edits have been made these are in **bold underlined text**. The red text reflects the latest amendments made by the chairs in CRD04:

Paragraph 43: “Industry has the **primary** responsibility for implementing, documenting, validating, **verifying** and supervising process control systems to ensure the safety and suitability of raw beef, fresh leafy vegetables, raw milk and raw milk cheeses, and sprouts.”.

Rationale: This section is about industry responsibility and FBOs are ultimately responsible for ensuring food is safe therefore suggest deleting reference to ‘primary’.

Paragraph 49: “The hygiene indicator microorganisms used should be those that are the most informative for the specific processing environment. ~~Examples of potential hygiene indicator microorganisms include counts of total mesophilic aerobic bacterial (mesophilic aerobes) counts bacteria, counts of coliforms or fecal coliforms, counts of total E.coli, and counts of Enterobacteriaceae.”.~~

Rationale: editorial suggestion to simplify and improve overall clarity. It is suggested to delete reference to examples of hygiene indicator microorganisms as these are given in the proposed definition.

Specific Comments on Annex I of CX/FH 22/52/7 – Raw Beef

Paragraph 20: “Of particular concern is preventing the formation of faecal accumulation on animal hides, as this can interfere with hygienic **dehiding skinning** and evisceration.

- Reduce the potential for STEC transmission through consumption of contaminated **feed feed** and water by the following:
 - Design **feed feed** and water delivery systems (tanks, trough, bins, etc.) in a way to reduce the potential for animal entrance and defecation.”.

Rationale: ‘Dehiding’ is suggested for consistency with the rest of the document. Suggest replacing the use of ‘food’ with ‘feed’.

Paragraph 32: “The lairage area should be cleaned as much as possible for each lot of animals, with the removal of gross contamination and residues with application of **chlorinated** water under pressure on the floor.”.

Rationale: Given wider work within CCFH on using water fit for its intended purpose, it is suggested that the

word 'chlorinated' is deleted here.

Paragraph 75: “Consumers should apply the ~~general principles for safer food~~ **WHO Five Keys to Safer Food** to ensure safety of raw beef when handling, preparing and consuming; these are:

- Keep ~~the food preparation and consuming sites~~ clean,
- Separate raw and cooked ~~food to avoid/prevent cross-contamination.~~
- Cook thoroughly.
- Keep food at safe temperatures.
- Use safe water and raw materials ~~for food preparations.~~”.

Rationale: Amendments are suggested to maintain consistency with the core WHO messaging on food hygiene.

Specific Comments on Annex II of CX/FH 22/52/7 – Fresh Leafy Vegetables

Paragraph 5: “This Annex covers specific guidance for the control of STEC related to fresh leafy vegetables that are intended to be consumed without cooking. ~~Fresh leafy vegetables for the purposes of this Annex include all vegetables of a leafy nature where the leaf is intended for consumption without cooking, and include, but are not limited to, all varieties of lettuce, spinach, cabbage, chicory, endive, kale, radicchio, and fresh herbs such as coriander, cilantro, basil, curry leaf, colocasia leaves and parsley.~~ The Annex is applicable to fresh leafy vegetables grown in open fields or in fully or partially protected facilities (hydroponic systems, greenhouses/controlled environments, tunnels etc.).”.

Rationale: Amendment for simplification and clarity. The text which is proposed to be deleted defines what a fresh leafy vegetable is, which is immediately followed by the definition in paragraph 6. This seems to be unnecessary duplication.