

# 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

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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 South Africa**

South Africa appreciates the opportunity to provide comments on the different agenda items to be discussed by the Fifty Second Session of Codex Committee on Food Hygiene (CCFH 52)

**AGENDA ITEM 5: DRAFT GUIDANCE FOR THE MANAGEMENT OF BIOLOGICAL FOODBORNE OUTBREAK, AT STEP 7, (CX/FH22/52/5)**

**General Comment**

**Appendix 1**

**Considering whether it is ready to be advanced to Step 8 for adoption by CAC45.**

**General comment**

**Position:** South Africa reviewed the revised guidance on management of biological food borne outbreaks and found the guidance acceptable and covering the most essential elements and supports the advancement of the guideline in the step process to step 8 for adoption.

**Rationale:** The guidance is informative, clear and flexible in the management of microbiological foodborne outbreaks.

**AGENDA ITEM 6: PROPOSED DRAFT DECISION TREE (REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CXC 1-1969), (CX/FH 22/52/6)**

**Call for comments on the decision tree and/or CCP identification worksheet presented in Annexes 1 and 2 of CX/FH 22/52/6 and to comment on whether either of the two proposals are suitable for inclusion in the revised General Principles for Food Hygiene (CXC 1-1969).**

**General comment**

**Position:** South Africa supports the adoption of the revised decision tree as presented in Annex 1 for inclusion in the General Principles of Food Hygiene (CXC 1-1969).

**Rationale:**

- i) Decision tree is easier to understand and use by FBO's as well as experts compared to the determination work sheet which involves text
- ii) In training industry players it's easier to use a decision tree than a determination work sheet
- iii) The retention of Q1 in its modified form is important to take account of all hazards, whether significant or not.

**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, AT STEP 4, (CX/FH 22/52/7)**

## General comment

**Call for comments to consider the proposed draft Guidelines, review the General section for completeness, and address, in particular, the outstanding issues in square brackets and provide a recommendation on whether it is ready for progression in the step procedure**

**Position:** South Africa supports the advancement in the step process the Draft Guidelines for the Control of Shigatoxin-producing *Escherichia coli* (STEC) in raw beef, fresh leafy vegetables, raw milk and raw milk cheeses and sprouts.

**Rationale:** The draft guidelines is adequate in addressing risk management aspects of STEC in the various annexes for the identified high risk products.

## Guidelines:

### Section 4: Para 20: Definition of Indicator microorganisms

**Position:** South Africa proposes to consider **option 2** in the square brackets for the definition “Indicator microorganisms - microorganisms used as a sign of quality or hygienic status in food, water, or the environment, often used to signify the potential presence of pathogens, a lapse in sanitation or a process failure. Common indicator microorganisms include total bacterial counts, coliform or faecal coliform counts, total *E. coli* counts and counts of Enterobacteriaceae.

**Rationale:** The definition of option 1 may create confusion where it states that it includes the evaluation of quality and safety.... the word 'safety' implies that indicator organisms are a good indication of the safety of the product, which is not necessarily the case. The second definition however, is clearer in that it states "...signify the potential presence of pathogens".

### Section 10.3.2, Para 45, Regulatory systems, Use of ‘Could’ or ‘Should’

**Position:** South Africa supports option 2 in the square brackets for the definition “The competent authority could provide guidelines and other implementation tools to industry, as appropriate, for the development of the process control systems”.

**Rationale:** It is customary for the CA to have the option to assist the industry and Food safety is the responsibility of the FBO.

## ANNEX 3, RAW MILK AND RAW MILK CHEESES

### Technical Comments

#### Section 1, para 1: Introduction

**Position:** South Africa proposes that the word **sterilized** be deleted.

**Rationale:** UHT milk as a process already indicates that the product has undergone a high temperature process.

#### Section 1, para 3, last sentence: Introduction

**Position:** SA proposes the deletion of the words “**be isolated from some resulting raw milk cheeses**” and to add the words “**when the product is consumed**” after illness.

The sentence to read: When STEC-contaminated milk is used to produce raw milk cheeses, STEC may survive and potentially caused foodborne illness, when the product is consumed.

**Rationale:** The contaminated milk used to make the cheeses is expected to contain STEC.

#### Section 3, Para 8, Bullet 5: Definition of Validation

**Position:** South Africa proposes that the words **under control** to be changed to **effective**.

**Rationale:** The definition is not in line with CXG 69-2008 as referenced in the Footnote.

#### Section 6, Para 26: Controls during Milk collection, Storage and Transportation

**Position:** SA proposes the addition after the word followed a new sentence that read as follow:

**However, it is identified as a stage where growth of STEC may occur if the milk is not properly cooled during transportation.**

The para to read: The stage of transport has not been identified as a step likely to contaminate the milk with STEC, if good practices are followed. However, it is identified as a stage where growth of STEC may occur if the milk is not properly cooled during transportation.

**Rationale:** The hazard is present if not following good practices.

### **Section 9.3: Verification of Control Measures**

#### **Para 46**

**Position:** South Africa proposes that the words “accidentally present” be replaced by the word incidental.

**Rationale:** To permit consistency of Codex text and of interpretation.

#### **Para 47**

**Position:** South Africa proposes to add the words **or Industry associations** to the sentence after the word FBO:

The sentence to read: The FBO or Industry Associations defines its sampling plan in line with its own acceptable quality level.

**Rationale:** Due to a lack of technical expertise, some FBO’s may not be in a position to define the sampling plans.

## **AGENDA ITEM 8: PROPOSED DRAFT GUIDELINES FOR THE SAFE USE AND RE-USE OF WATER IN FOOD PRODUCTION, AT STEP, (CX/FH 22/52/8)**

### **General comment 1**

**Indicate whether the term “potable water” rather than “drinking water” should be used throughout the document**

**Position:** South Africa proposes that the term Potable water (Drinking water) should be used when it is first used in the document (The Committee may consider using a Footnote) and thereafter the term Potable water should be used for consistency.

**Rationale:** Potable water is deemed as drinking water and vice versa and the WHO Guidelines for Drinking Water Quality supports the pot-ability of drinking water.

## **ANNEX I FRESH PRODUCE**

### **Technical comment 1**

**Overarching issues, to determine whether to keep in paragraphs 5 to 36 adapted to the scope of this guidelines, or to replace by a cross-reference to CXC 53-2003.**

**Position:** South Africa supports that para’s 5 to 36 are retained in the document.

**Rationale:** The information shall be holistically contained in one document without the need to cross-reference.

### **Technical comment 2**

**Page16, Paragraph 57,** determine whether the tools (DT) are appropriate for the development of the document

**Position:** South Africa agrees that the DT is a useful guidance for decision-making and examples are elaborate but they may be presented as information documents in order not to make the guideline so detailed and bulky

**Rationale:** It clearly illustrates when one needs to consider conducting tests on water and the frequency of testing the water

### Technical comment 3

**To indicate if it is considered appropriate to ask FAO/WHO if validation of the examples can be considered, as well as more concrete recommendations on thresholds and sampling frequencies**

**Position:** South Africa recommends that it's appropriate to request FAO/WHO to validate the examples as well as recommendations on thresholds and sampling frequencies.

**Rationale:** Validation is essential during risk assessment and it will provide assurance that the examples, thresholds and sampling frequencies are indeed useful.

## ANNEX II FISHERY PRODUCTS

### Technical comment 1:

**To choose the most appropriate definitions for fishery products, harvesting and fit for purpose water, from the proposed definitions in section 4.**

#### Definitions

**Position 1:** South Africa proposes to consider **Definition 1 "Fishery products:** Any species of fish, including crustaceans, molluscs, gastropods, or part of them intended for human consumption".

**Rationale:** To harmonize with the definition as already existing in CXC 52:2003, Code of Practice for Fish and Fishery Products.

**Position 2:** South Africa proposes to consider **definition 1, "Harvesting:** Operations involving taking the fish from the water.

**Rationale:** To harmonize with the definition as already existing in CXC 52:2003, Code of Practice for Fish and Fishery Products.

**Position 3:** South Africa proposes that the Fit for purpose water Definition in the main document to be used.

**"Fit for purpose water"**:- Water which is determined through an assessment of risk to be safe when used as intended.

**Rationale:** Even-though the definition is very concise and does not elaborate on the purpose of the water for example, it emphasizes risk assessment and the safety of the water.

### Technical comment 2

**To consider if the information provided in the annex so far is enough or to hold the document until the JEMRA expert report meeting on water use and reuse for fish and fishery products becomes available to include further information**

**Position:** South Africa proposes that the document is held until the JEMRA expert report meeting on water use and reuse for fish and fishery products becomes available to include further information

**Rationale:** The Codex standards should be based on scientific evidence as provided by JEMRA.

For this reason, having the up-to- date technical information contained in the document approved by the expert committee would be appropriate to consider for inclusion.