



Report of the U.S. Delegate, 43rd Session, Codex Committee On Food Hygiene

December 5-9, 2011
Miami, Florida

The United States believes the 43rd Session of the Codex Committee on Food Hygiene (CCFH) was a productive one, with the Committee completing work on two items, revising another document, discussing two additional documents that are in process and initiating two new work items. The Committee:

- Completed work on *Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food*, recommending adoption by the Codex Alimentarius Commission (CAC) at Steps 5/8.
- Completed work on the *Proposed Draft Annex to the Code of Hygienic Practice for Fresh Fruits and Vegetables, Annex IV: Annex for Melons*, recommending adoption by the CAC at Steps 5/8.
- Revised the *Risk Analysis Principles and Procedures Applied to by the Codex Committee on Food Hygiene* and forwarded them to the CAC for adoption.
- Continued work on the revision to the *Principles for the Establishment and Application of Microbiological Criteria for Foods*, returning it to step 2 for revision by a physical working group.
- Continued work on the *Guidelines for the Control of Specific Zoonotic Parasites in Meat: Trichinella spiralis and Cysticercus bovis*, returning it to step 2 for revision by an electronic working group.
- Agreed to new work on an annex on berries for the *Code of Hygienic Practice for Fresh Fruits and Vegetables*.
- Agreed to new work on revision of the *Code of Hygienic Practice for Spices and Dried Aromatic Plants*.

The 43rd Session of CCFH was attended by 261 participants representing 90 Member countries, one Member organization (the European Union (EU)), and nine international intergovernmental and non-governmental organizations. The United States was represented by the Delegate, Ms. Jenny Scott, FDA Center for Food Safety and Applied Nutrition; Co-Alternate Delegates Dr. Kerry Dearfield, USDA Food Safety and Inspection Service, and Dr. Joyce Saltsman, FDA Center for Food Safety and Applied Nutrition; eleven government advisors; and three non-government advisors.

A summary of the results of the 43rd Session of CCFH is given below. The full report of the Session can be found on the Codex Website, www.codexalimentarius.net.



MEETING SUMMARY

Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food

The Committee has worked for several years to develop guidance on the application of the general principles of food hygiene to the control of viruses in foods (including annexes on bivalve molluscs and fresh produce). Based on prior work, including several working group meetings, an electronic working group, and a final working group meeting held immediately prior to this Session of CCFH, essentially all technical aspects of the document were completed and agreed upon. At this Session of CCFH, the Committee carried out a final paragraph-by-paragraph review, making a few additional technical changes to the document.

The Committee completed work on the document and agreed to forward it to the Codex Alimentarius Commission for adoption at Steps 5/8.

Proposed Draft Principles for the Establishment and Application of Microbiological Criteria for Foods

The Committee agreed to take up the revision to the *Principles for the Establishment and Application of Microbiological Criteria for Foods* (CAC/GL 21-1997) at its 41st session, with Finland and Japan serving as co-leads for this work. Two physical working groups had been held, as well as an in-session working group during this meeting of CCFH; however, there continues to be concern that the guidelines need to be more user-friendly and flexible to allow use by countries with different levels of expertise on these issues. Moreover, complexities have arisen with respect to several areas, including the precise areas where microbiological criteria can be applied (e.g., product lot-by-lot acceptance; process control, environmental assessment); the specifics of sampling (attributes sampling, variables sampling); and the relationship and use of microbiological criteria with respect to food safety objectives, performance objectives and other metrics.

The Committee agreed that significant work remained to make the document a useable one. It also noted the importance of developing a number of specific examples on the application of microbiological criteria, including examples of microbiological criteria relating to the following areas: 1) a GHP-based approach; 2) assessment of the acceptability of a food lot; 3) verification of the performance of a HACCP system; 4) verification of the performance of a food safety control system; 5) prevention of a high-prevalence foodborne pathogen for a risk-based approach to control; and 6) operationalizing a performance objective for a risk-based approach to control.

The Committee agreed to develop the examples through electronic means by teams of two or more countries (a lead and collaborating countries). In order to engage developing countries in this effort, the Codex Trust Fund will be requested to provide

support for 10-12 active participants to attend the working group meeting. The United States volunteered to lead a team (including Argentina, Uruguay and Thailand) to provide an example of a microbiological criterion for lot acceptability and a team (including Brazil) to develop an example of a microbiological criterion for operationalizing a performance objective.

The document was returned to Step 2 for further development by a physical working group, which will meet in Europe in 2012 to discuss and finalize each of the examples, as well as revise the main body of the document. The revised version will be circulated at Step 3 for country comments prior to the next session of the Committee.

Proposed Draft Guidelines for the Control of Specific Zoonotic Parasites in Meat: *Trichinella spiralis* and *Cysticercus bovis*

CCFH, at its last Session, approved new work on the development of *Guidelines for the Control of Specific Zoonotic Parasites in Meat: Trichinella spiralis and Cysticercus bovis*. Although the United States unsuccessfully opposed this work since, in its view, the work on these two parasites had little public health significance and the work related primarily to trade facilitation, we have actively engaged in this effort. A physical working group, led by New Zealand and the European Union, prepared an initial draft text that focused on post-harvest controls for the two specific parasites.

The document itself was not considered in detail by this Session of CCFH. The Committee noted that work ongoing by the OIE relating to pre-harvest control of *Trichinella* was closely linked to this CCFH work and that it would be difficult to develop the CCFH post-harvest guidelines for *Trichinella* without the OIE document being completed. The Committee agreed to extend the current portion of the text dealing with *Trichinella* to include all *Trichinella* species, not solely *Trichinella spiralis*. The Committee also agreed that a general document addressing parasites as a whole is a better approach for guidance on these parasites, with these specific parasite sections appended as annexes. However, this approach needs to await the completion of a planned FAO/WHO Joint Expert Consultation on parasites in food (currently planned for 2012, pending the availability of financial resources), which would serve as the basis for the general document. Some delegations indicated that CCFH work should not proceed until the OIE completed its revision of Section 8.13 (Infection with *Trichinella* spp.) of the OIE *Terrestrial Animal Health Code*, while other delegations felt that work should continue in parallel. In addition, some delegations felt that continuation of the work should wait until completion of the FAO/WHO Expert Consultation on parasites and the development of a general guidance on parasites that would provide the framework for annexes on parasite/commodity pairs. The Secretariat noted that the guidelines on parasite/commodity pairs could also be appended to the *Code of Hygienic Practice for Meat* (CAC/RCP 58-2005).

The Committee also considered what to do with the risk profiles for *Trichinella* and *Cysticercus bovis*, as it was not appropriate to append them to the guidelines. WHO suggested that they be peer-reviewed by FAO/WHO experts and be included in the repository of risk profiles on the WHO and FAO websites.

The Committee agreed to establish an electronic working group to revise the draft guidelines, taking into account the decision to expand the guidance to include all *Trichinella* species. The Committee noted that OIE's work on revising Section 8.13 of the OIE *Terrestrial Animal Health Code* was tightly linked to the CCFH work and that the OIE work had to be either sufficiently progressed or completed to allow CCFH's work on *Trichinella* to be completed. The risk-based measures for control of *Cysticercus bovis* are not dependent on OIE pre-harvest guidelines.

The proposed draft guidelines were returned to Step 2 for further re-drafting by an electronic working group. The Committee noted the importance of OIE participation in the electronic working group and encouraged the Codex Secretariat to explore the possibility of OIE involving representatives of CCFH in its work on foodborne parasites.

Proposed Draft Annex on Melons to the *Code of Hygienic Practice for Fresh Fruits and Vegetables*

The Committee had agreed at its 2010 Session to develop an Annex to the *Code of Hygienic Practice for Fresh Fruits and Vegetables* on melons (Melon Annex) with work to be led by Canada and co-led by the United States. An initial draft of the Annex was developed by Canada (with the assistance of the United States) and subsequently revised by a Physical Working Group. This Session of CCFH considered the draft and carried out a paragraph-by-paragraph review. The Committee made many technical adjustments to the document, including the following:

- Amended the introduction to reflect that pathogens other than *Salmonella*, such as *Listeria monocytogenes*, were also implicated in outbreaks of illness from melons;
- Amended the scope to be more generic in covering primary production to consumption;
- Revised the definition of melons to clarify that melons other than those mentioned were included;
- Took into account that high risk production sites had the potential to contaminate water sources as well as production fields, and that when risks are serious, sites should not be used for melon production;
- Took into account the impact of different types of mulch on microbiological risk;
- Indicated that, to the extent practicable, children should be excluded from harvest areas;
- Indicated that, in instances where no running water was available, the guidance should not solely recommend the use of hand wipes but should be flexible,



permitting competent authorities to recommend a variety of acceptable alternative hand-washing methods;

- Added guidance on personal hygiene to a section on field packaging operations;
- Amended the section on control of operations to better emphasize that prevention was particularly important;
- In the section on establishment maintenance and sanitation, added a provision that food contact surfaces should be cleaned and disinfected before the start of the melon harvest seasons and throughout the season to prevent build-up of pathogens on equipment;
- Added a reference to the FAO/WHO "Five Keys to Safer Food" in the Product Information and Consumer Awareness Section.

The Committee completed work on the document and agreed to forward it to the Codex Alimentarius Commission for adoption at Steps 5/8.

OTHER MATTERS

Endorsement of the Hygiene Provisions of Commodity Standards

Codex Standard for Live and Raw Bivalve Molluscs: The Codex Committee on Fish and Fishery Products (CCFFP) requested that CCFH provide advice on whether the microbiological criterion for *Salmonella* in the *Codex Standard for Live and Raw Bivalve Molluscs* should be retained. FAO reviewed a report from an FAO/WHO Expert Meeting that assessed whether criteria for *Salmonella* provided meaningful public health protection. The Committee agreed that it was inappropriate to include this provision in the standard, since the likelihood of finding *Salmonella* was relatively low, the specified testing requirement was too resource intensive for the public health benefit gained, and the criterion was inconsistent with the *Codex Principles for the Establishment and Application of Microbiological Criteria for Food*. However, some delegations wanted to retain the criterion, as raw bivalve molluscs are widely consumed in their countries. The Committee did agree to include a statement in the standard as follows: "When appropriate, taking into account the epidemiological situation as indicated by the results of environmental monitoring and/or other surveillance, the competent authority may decide to implement a criterion for *Salmonella*."

Proposed Draft Standard for Smoked Fish, Smoke-Flavored Fish and Smoke-Dried Fish: The Committee endorsed the hygiene provisions of the *Proposed Draft Standard for Smoked Fish, Smoke-Flavored Fish and Smoke-Dried Fish* as amended by CCFFP based on proposals made by CCFH at its 42nd session. However, the Committee noted that a statement in the CCFFP response to the CCFH-proposed changes indicating that no foodborne outbreaks of *Clostridium botulinum* had been reported from uneviscerated fish was incorrect and that risk management measures for *C. botulinum* needed to be taken for such products.



Regional Standard for Street-Vended Foods (Near East): The Committee considered the hygiene provisions of a Codex Regional *Standard for Street-Vended Foods* prepared by the Codex Regional Coordinating Committee for the Near East and expressed concerns regarding certain hygiene provisions. The Committee agreed to request comments on the Code and reconsider the Code at its next Session in 2012.

Principles and Guidelines for the Conduct of Microbiological Risk Assessment :

The electronic working group on future work on animal feeding had identified gaps in existing Codex risk analysis procedures with respect to applicability to animal feed. With respect to the *Codex Principles and Guidelines for the Conduct of Microbiological Risk Assessment*, the working group had proposed revisions to insert text related to animal feed. The Committee did not support the revised text as written, indicating it presented several issues. Rather than trying to revise the text to address the concerns, the Committee agreed to include a footnote in the Scope section of the document to indicate that the risk assessment principles also applied to feed and feed ingredients for food-producing animals where it could impact on food safety.

Risk Analysis Principles and Procedures Applied by the Codex Committee on Food Hygiene

The Committee had previously developed a set of risk analysis principles and procedures used by CCFH in its work. The document had been reviewed by the Codex Committee on General Principles and adopted by the Codex Alimentarius Commission at its 2010 Session. However, some delegations stated that one section of the document relating to the process for undertaking new work should be removed from the text and that certain other revisions/reordering should be made for clarity. At the 2010 (42nd) Session of CCFH, the Committee asked the European Union to prepare a revision to the *Risk Analysis Principles and Procedures used by the Codex Committee on Food Hygiene* for consideration by the Committee.

The Committee generally found the revised document to be satisfactory. The United States suggested two changes to the document to make it clear that the guidance developed by CCFH provided risk management recommendations on food hygiene and not decisions, since Codex as an organization provides recommendations, not risk management decisions (which are the responsibility of national governments). The United States also stated that it was important that the process for undertaking new work, now removed from the document, not be lost. The Codex Secretariat noted that the new work procedures could either be included as an Annex to a CCFH meeting report, could be included in the Codex Procedural Manual, or could otherwise be retained, for example as a document placed on the Codex website. The Committee agreed that, for the present, the procedures could remain in an Annex to the Report of this Session of CCFH but that ultimately the procedures should be made available on the Codex website.



The Committee agreed to forward the revised *Risk Analysis Principles and Procedures used by the Codex Committee on Food Hygiene* to the Codex Committee on General Principles for review and subsequently to be sent to the Codex Commission for adoption.

RECOMMENDED NEW WORK FOR CCFH

Based on an established process for submitting new work proposals, a CCFH Working Group led by Thailand and meeting immediately prior to the Session considered several items: a proposal from Peru to develop a code of hygienic practice for cocoa and chocolate; a second proposal from Peru to work on packaging materials, including the migration of packaging components into food; and, a proposal from the United States to revise the existing Codex *Code of Hygienic Practice for Spices and Aromatic Herbs*. The Working Group also considered a submittal by Australia that reviewed older existing Codex codes of hygienic practice and provided recommendations relating to their revision. The Working Group also received a proposal from Brazil to develop an annex on berries to the Codex *Code of Hygienic Practice for Fresh Fruits and Vegetables* and a proposal from Nigeria to revise existing Codex codes of hygienic practice on tree nuts and ground nuts.

The Working Group did not accept the proposal from Peru relating to packaging materials, noting that this work area was not within the Terms of Reference of CCFH. The Working Group suggested that the proposal could be submitted to the Codex Committee on Contaminants in Foods, which dealt with this subject area. The Committee agreed with this approach.

The Committee, based on the Working Group's recommendation, agreed that the proposal from Peru to undertake work on the development of a code of hygienic practice for cocoa and chocolate had merit but felt that the development of a stand-alone code on this subject was not the best use of resources. The Working Group recommended and the Committee agreed that a better approach was to develop a horizontal code of hygienic practice for low-moisture foods. Such a code could include a number of product areas (including several existing codes of practice) including cocoa/chocolate, ground nuts and tree nuts, desiccated coconut, dried fruit, certain soy products and seeds used for food, as well as spices. The Committee agreed that the United States would prepare a Discussion Paper for the development of a code of hygienic practice for low-moisture foods for consideration by the next Session of CCFH.

The Committee, based on the recommendations of the Working Group, considered a proposal from the United States to revise the existing Codex *Code of Hygienic Practice for Spices and Aromatic Herbs*. The Committee noted that this work should be included in the proposal relating to low-moisture foods but also agreed that revision of this Code should proceed on a priority basis and could be included as an annex to the low-



moisture food code when that guidance was developed. The Committee agreed to undertake new work on the revision of the spice code, and submitted this proposal along with a Project Document to the Codex Alimentarius Commission for approval at its next (2012) Session. The United States will chair this new work.

At the request of Brazil, and on the recommendation of the Working Group, the Committee also considered a proposal to develop a berries annex to the *Codex Code of Hygienic Practice for Fresh Fruits and Vegetables*. The Committee agreed to undertake new work on this Annex and submitted this proposal and a Project Document to the Codex Alimentarius Commission for approval at its next (2012) Session.

The Committee also agreed to a Discussion Paper to be developed by Australia on new work and periodic review of existing codes of hygienic practice. The Discussion Paper would consider new work and periodic review/revision of codes of hygienic practice and would:

- provide a process for ensuring that prior decisions relating to new work were not lost, including the handling of project documents for work that was not initially considered a priority by the Committee;
- ensure that any list developed by CCFH related to new work, including the current list of existing codes that needed to be revised, would be retained, reviewed and updated on a regular basis; and
- develop criteria to be used in assessing the priorities for moving work in the agenda of CCFH.

The Working Group, responding to an interest in revising an existing code on mass catering, considered this subject, noting that work in this area might also include the areas of retail and institutional food service and refugee feeding. While no action was specifically taken by the Committee on this subject, it is expected that it will be taken into account in the Discussion Paper to be prepared by Australia.

The United States volunteered to chair the working group on CCFH work priorities next year.

NEXT SESSION OF CCFH

The 44th Session of CCFH is tentatively set for November 12-16, 2012 in New Orleans, LA, USA.