

**REPORT OF THE UNITED STATES DELEGATE  
TO THE 54<sup>th</sup> SESSION OF THE  
CODEX COMMITTEE ON FOOD HYGIENE**

**March 11-15, 2024  
Nairobi, Kenya**

The 54<sup>th</sup> Session of the Codex Committee on Food Hygiene (CCFH54), chaired by Dr. Evelyne Mbandi, Food Safety and Inspection Service (FSIS), U.S. Department of Agriculture (USDA), and co-chaired by Professor George Ooko Abong, University of Nairobi, had 169 participants from 56 Member countries, one Member Organization (the European Union (EU)), and 11 Observer Organizations. The United States was represented by the Delegate, Dr. Benjamin Warren, Center for Food Safety and Applied Nutrition (CFSAN), U.S. Food and Drug Administration (FDA); Co-Alternate Delegates, Dr. Bill Shaw, FSIS-USDA, and Dr. Eric Stevens, CFSAN-FDA; two government advisors; and one non-government advisor.

The session opened with comments from Dr. Jose Emilio Esteban, Under Secretary for Food Safety, USDA, and three Cabinet Secretaries from the government of Kenya: the Honorable Mithika Linturi (Ministry of Agriculture and Livestock Development); the Honorable Nakhumicha S. Walufa (Ministry of Health); and the Honorable Rebecca Miano (Ministry of Investment, Trade, and Industry). The opening session highlighted Kenya's commitment to global food safety as key to the achievement of sustainable development goals and the importance of Codex work because everyone in the world is entitled to the same level of food safety. The Chairperson of the Codex Alimentarius Commission (CAC), Mr. Steve Wearne, also addressed CCFH and expressed appreciation for the critical work being undertaken by the committee.

The United States' objectives for the meeting were generally realized. CCFH54 recommended four key documents for final adoption by the 47<sup>th</sup> Session of the Codex Alimentarius Commission (CAC47, November 2024); the documents are in line with the U.S. commitment to science-based decision making. These outcomes allowed the Committee to advance three items of new work, subject to approval by CAC47.

**NEXT SESSION OF CCFH**

The 55<sup>th</sup> Session of CCFH (CCFH55) is tentatively scheduled for late 2025 in the United States.

**HIGHLIGHTS**

The 54<sup>th</sup> Session of CCFH:

- Agreed to forward the Annexes on Fresh Leafy Vegetables and Sprouts of the *Guidelines for the Control of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef, Fresh Leafy Vegetables, Raw Milk and Raw Milk Cheeses, and Sprouts* (CXG 99-2023) to CAC47 for final adoption at Step 5/8.
- Agreed to forward the Annex on Milk and Milk Products of the *Guidelines for the Safe Use and Re-Use of Water in Food Production* (CXG 100-2023) to CAC47 for final adoption at Step 5/8.
- Agreed to forward the draft *Guidelines for Food Hygiene Control Measures in Traditional Markets for Food* to CAC47 for final adoption at Step 5/8.

- Agreed to establish an electronic working group (EWG) on the *Guidelines for the Safe Use and Re-Use of Water in Food Production* (CXG 100-2023), chaired by the EU and co-chaired by Morocco, Honduras, Mauritania, India, and the International Dairy Federation (IDF) to revise the Annex on Fish and Fishery Products as well as to develop an Annex related to water-fit-for-purpose assessment, safety management, and technologies for recovery and treatment of water for reuse.
- Agreed to forward the proposed draft revision of the *Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood* (CXG 73-100) to CAC47 for interim adoption at Step 5 (allowing for circulation and comment by Members and Observers), noting that all references to water remained in square brackets. Also agreed to revisit this text upon completion of Annex II (Fish and Fishery Products) of the *Guidelines for the Safe Use and Reuse of Water in Food Production and Processing* (CXG 100-2023).
- Agreed to establish an EWG, chaired by China and co-chaired by the United Kingdom and the EU to initiate structural alignment work of existing CCFH texts with the recently revised *General Principles of Food Hygiene* (CXC 1-1969), starting with the most recently adopted texts listed in Appendix VII of the CCFH54 Report, and to develop a timeframe for completing alignment.
- Agreed to forward proposals for new work for approval by CAC47 to update the following CCFH texts: (1) *Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat* (CXG 78-2011); (2) *Guidelines on the Application of the General Principles of Food Hygiene to the Control of Viruses in Food* (CXG 79-2012); and (3) *Guidelines on the Application of the General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods* (CXG 61-2007). The new work will include alignment with the *General Principles of Food Hygiene* (GPFH, CXC 1-1969).

A summary of the meeting of the 54<sup>th</sup> Session of CCFH is given below. The official report of CCFH54 is posted on the Codex website at the following link: <https://www.fao.org/fao-who-codexalimentarius/meetings/detail/en/?meeting=CCFH&session=54>.

**MEETING SUMMARY**

<b>Proposed Annexes on Fresh Leafy Greens and Sprouts of the <i>Guidelines for the Control of Shiga Toxin-Producing Escherichia coli (STEC) in Raw Beef, Fresh Leafy Vegetables, Raw Milk and Raw Milk Cheeses, and Sprouts (CXG 99-2023)</i></b>
<b>To Be Presented for Adoption at Next CAC? Yes</b> <b>Have the United States' Objectives Been Met? Yes</b> <b>Is it anticipated that this item will or should be raised at the CAC because it is contentious? No</b>
<b>United States' Objective</b> The United States' objective was to finalize the Annexes on Fresh Leafy Greens and Sprouts and forward them to CAC47 for final adoption at Step 5/8.
<b>Discussion in Relation to United States' Objectives</b> For the Annex on Fresh Leafy Greens, there was discussion on whether to include regular health checks for workers. It was noted that periodic health checks might not effectively identify STEC infections. Ultimately, it was decided not to include a provision for regular health checks so as not to be overly restrictive, and because other provisions already prohibit individuals with gastrointestinal illnesses from entering areas where fresh leafy vegetables are handled.  For the Annex on Sprouts, there was discussion and revision of the section relating to testing of seed lots before entering production. Ultimately, the Committee modified several paragraphs to clarify that if initial testing indicates the possible presence of STEC then additional testing for STEC is recommended.
<b>Outcome/ Conclusion</b> The Committee agreed to forward both Annexes to CAC47 for final adoption at Step 5/8.

**Proposed Annexes on Fish and Fishery Products and Milk and Milk Products for the *Guidelines for the Safe Use and Re-Use of Water in Food Production (CXG 100-2023)***

**To Be Presented for Adoption at Next CAC? Yes**

**Have the United States' Objectives Been Met? Mostly (see comments)**

**Is it anticipated that this item will or should be raised at the CAC because it is contentious? No**

**United States' Objectives**

The United States' objectives were to finalize both annexes and for CCFH54 to recommend final adoption by CAC47 at Step 5/8. With respect to the Annex on Milk and Milk Products, the United States also had an objective to move general sections of the text relating to water safety management and water-fit-for-purpose assessment into a new Annex IV, as previously proposed by the EWG Chairs, since these provisions are broadly relevant, beyond milk and milk products.

**Discussion in Relation to United States' Objectives**

For the Annex on Milk and Milk Products there was general discussion to clarify fit-for-purpose water applications in dairy plants. There was wide agreement to move sections on water safety and water-fit-for-purpose assessment to a new Annex on technologies for water reuse.

For the Annex on Fish and Fishery Products, there was extensive discussion of the proposed figures and decision trees on the risk associated with water depending on its use and source. After much revision, there was general agreement on the path forward but large parts of the document still needed work.

**Outcome/ Conclusion**

The Committee agreed to forward the Annex on Milk and Milk Products to CAC47 for final adoption at Step 5/8. The Committee also agreed to return the Annex on Fish and Fishery Products to Step 2/3 for redrafting and further consideration, along with the newly proposed Annex IV.

Given the need for more clarity on the use of water that is fit-for purpose (which will impact the work on vibrio, as described below), the United States considers returning the Annex on Fish and Fishery Products to Step 2/3 to be a successful outcome.

<b>Proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food</b>
<b>To Be Presented for Adoption at Next CAC? Yes</b> <b>Have the United States' Objectives Been Met? Yes</b> <b>Is it anticipated that this item will or should be raised at the CAC because it is contentious? No</b>
<b>United States' Objective</b> The United States' objective was to advance the draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food and, if possible, for CCFH54 to recommend final adoption by CAC47 at Step 5/8, thereby enabling the Committee to take on proposed new work.
<b>Discussion in Relation to United States' Objectives</b> Given that the United States does not anticipate significant use of this document domestically, the delegation generally deferred to Members who were most likely to use it as best positioned to inform its content. From the perspective of the United States, an important question was how this text related to work on the alignment of CCFH texts with the <i>General Principles of Food Hygiene</i> (GPFH, CXC 1-1969). Ultimately, the United States was satisfied with the Committee's decision to make an exception for this document and retain its unique stand-alone structure, as Members considered that would be more conducive to effective implementation and avoid delaying final adoption.
<b><u>Outcome/ Conclusion</u></b> The Committee agreed to forward the proposed draft Guidelines for Food Hygiene Control Measures in Traditional Markets for Food to CAC47 for final adoption at Step 5/8.

<p align="center"><b>Proposed revision to the <i>Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood (CXG 73-2010)</i></b></p>
<p><b>To Be Presented for Adoption at Next CAC? Yes</b>  <b>Have the United States’ Objectives Been Met? Yes (see comments)</b>  <b>Is it anticipated that this item will or should be raised at the CAC because it is contentious? No</b></p>
<p><b>United States’ Objective</b>  The United States’ objective was to finalize revisions to the <i>Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood (CXG 73-2010)</i> and for CCFH54 to recommend final adoption by CAC47 at Step 5/8 if possible, to allow the Committee to take on proposed new work.</p>
<p><b>Discussion in Relation to United States’ Objectives</b>  There was extensive discussion regarding the definition and use of the terms “clean water” and “water fit for purpose” to describe water suitable for storage and handling of seafood aboard fishing vessels. Some members were of the opinion that “water fit for purpose” was too vague and did not give clear risk management guidance. Others were of the opinion that some provisions should include direction to use “potable water.”</p> <p>The United States intervened several times, recalling previous CCFH discussions over many years and noting that the purpose of developing the <i>Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023)</i> was to introduce a risk-based approach to the safe use of water, taking into consideration differences in water availability and accessibility, which resulted in the development of the concept of “water fit for purpose.” The U.S. position was supported by the Codex Secretariat and others who also recalled past lengthy discussions on water terminology and the impetus for the work on water use and reuse. It was further noted that Annex II on Fish and Fishery Products of CXG 100-2023, currently under development, would be the appropriate document in which to address guidance on the use of different water types and that it was important to ensure alignment with the water fit for purpose concept to avoid inconsistencies across food hygiene texts.</p> <p>Ultimately, in view of the difficulty in reaching consensus on this matter, CCFH54 agreed with the Chairperson’s proposal to place square brackets around all water-related wording and focus the discussion on other aspects of the document at this session.</p>
<p><b><u>Outcome/ Conclusion</u></b>  The Committee agreed to forward the proposed draft revisions to the <i>Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood (CXG 73-2010)</i> to CAC47 for interim adoption at Step 5 (for additional review, comment and consideration at a future session), noting that all references to water remained in square brackets.</p> <p>The Committee agreed to revisit this text upon completion of the work on Annex II (Fish and Fishery Products) of the <i>Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023)</i>. Therefore, no work is expected to be undertaken before the next session, and CCFH54 did not establish an EWG to work between sessions.</p>

<p><b>Alignment of Codex texts developed by CCFH with the revised <i>General Principles of Food Hygiene</i> (CXC 1-1969)</b></p>
<p><b>To Be Presented for Adoption at Next CAC? No</b>  <b>Have the United States’ Objectives Been Met? Mostly</b>  <b>Is it anticipated that this item will or should be raised at the CAC because it is contentious? No</b></p>
<p><b>United States’ Objective</b>  The United States’ objective was to agree to an approach to achieve alignment of Codex texts developed by CCFH with the recently revised <i>General Principles of Food Hygiene</i> (CXG 1-1969), as requested by the CAC and agreed to by CCFH at its last session (CCFH53, 2022). The U.S. preference was to proceed toward full alignment, recognizing that this would be the most resource-intensive option and therefore would require prioritization of the work.</p>
<p><b>Discussion in Relation to United States’ Objectives</b>  There was extensive discussion regarding the use of a hybrid approach, rather than simple structural alignment (format, headings, etc.) or proceeding with full technical alignment of all texts.</p>
<p><b><u>Outcome/ Conclusion</u></b>  The Committee agreed to prioritize the work on alignment into its forward work plan and adopt a hybrid approach that would fully align all new and ongoing work before it is recommended for adoption by the CAC. The Committee also agreed to establish an EWG that would develop initial proposals for structural alignment of other texts listed in Appendix VII of the CCFH54 report and propose a timetable for completion of the work.</p>
<p><b>Other Comments</b>  Given the discussion and the integration of this work with the New Work/Forward Work Plan EWG (chaired by the United States), this is an appropriate path forward.</p>

<b>New/Future Work</b>
<p><b>To Be Presented for Adoption at Next CAC? Yes</b>  <b>Have the United States' Objectives Been Met? Yes</b>  <b>Is it anticipated that this item will or should be raised at the CAC because it is contentious? No</b></p>
<p><b>United States' Objective</b>  The United States supported all three new work proposals, and therefore an overall objective for CCFH54 was to finalize the remaining documents on STEC and make significant progress on the rest of the agenda in order to make room for new work on the Committee's agenda for future sessions.</p>
<p><b>Discussion in Relation to United States' Objectives</b>  CCFH54 considered three proposals for new work to revise and update existing texts: revision of the <i>Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat</i> (CXG 78-2011), revision of the <i>Guidelines on the Application of the General Principles of Food Hygiene to the Control of Viruses in Food</i> (CXG 79-2012), and revision of the <i>Guidelines on the Application of the General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods</i> (CXG 61-2007). In addition, the 47<sup>th</sup> Session of the Codex Committee on Food Labelling had suggested that CCFH consider taking on work related to food allergens to avoid delay and ensure consistency between the <i>Code of Practice on Allergen Management for Food Business Operators</i> (CXC 80-2020, developed by CCFH) and new provisions on food allergens in the <i>General Standard for the Labelling of Pre-packaged Foods</i> (CXS 1-1985).</p> <p>There was widespread agreement on moving forward with all three new work proposals given the extended length of time (18 months) expected between the current session and the next CCFH session (late 2025). The Committee also noted that the scientific advice needed to begin work on updating the guidelines on <i>Listeria</i> and viruses is expected to be published by the Joint FAO/WHO Expert Meetings on Microbiological Risk Assessment (JEMRA) by the end of 2024.</p>
<p><b>Outcome/ Conclusion</b>  The Committee agreed to forward all three proposals for new work to CAC47 for approval. The Committee also noted the recommendation from CCFL47 and suggested that a Member may wish to prepare a discussion paper for CCFH55, based on the outcomes of CCFL48 (October 2024).</p>
<p><b>Other Comments</b>  The United States will serve as Chair for the work on revising the <i>Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat</i> (CXG 78-2011) and the <i>Guidelines on the Application of the General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods</i> (CXG 61-2007).</p>