

**MEETING OF AFRICAN FOOD SAFETY EXPERTS TO FORMULATE POSITION PAPER IN RESPECT OF THE 42ND SESSION
OF CODEX COMMITTEE ON FOOD HYGIENE**

NAIROBI, KENYA

17 - 19 NOVEMBER 2010

The Interafrican Bureau for Animal Resources of the African Union (AU/IBAR) provided support for a Technical Meeting of CCAFRICA Experts on Food Hygiene to develop Africa's Position Paper on Codex draft standards which will be discussed at the 42nd Session of the Codex Committee on Food Hygiene, scheduled for 29 November – 3 December 2010, Kampala, Uganda.

The Technical Meeting was organized as part of the strategies to enhance participation of African countries in the work of Codex. The meeting was held under the auspices of Participation of African Nations in SPS Standards Setting Organizations (PAN SPSO) Project of the AU/IBAR. The meeting was held in Nairobi, Kenya, from 17-19 November 2010 and was attended by Experts from Ghana, Kenya, Mali and Nigeria.

The documents reviewed were :

1. Proposed Draft Guidelines for the Control of *Campylobacter* and *Salmonella* Spp in Chicken Meat – **CX/FH 10/42/4 (At step 3)**
2. Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food – **CX/FH 10/42/5 (At step 3)**
3. Proposed Draft Revision of the Recommended International Code of Hygienic Practice for Collecting, Processing and Marketing of Natural Mineral Waters – **CX/FH 10/42/6 (At step 3)**
4. Proposed Draft Revision of the Principles for the Establishment and Application of Microbiological Criteria in Foods **CX/FH 10/42/7– (At step 3)**

After thorough review of these documents against the background of issues referred from the 41st Session of CCFH, which had been worked on by the appropriate Working Groups, the Group of Food Safety Experts came up with an African Position Paper that will serve as a guide for effective participation in the upcoming CCFH meeting in Kampala, Uganda.

In addition, Regional Strategies that will encourage and enhance effective participation in the 42nd Session of CCFH have also been recommended for consideration and implementation by member countries. Find below the recommended African Position Paper for consideration.

42 ND SESSION OF THE CODEX COMMITTEE ON FOOD HYGIENE					
AGENDA ITEM NO.	TITLE	AFRICA POSITION	RATIONALE	SPEAKER	SUPPORT
4	Proposed Draft Guidelines for the Control of <i>Campylobacter</i> and <i>Salmonella</i> spp. In Chicken meat (At step 3) CX/FH 10/42/4	We agree in principle for the need to use chlorine at the recommended concentration. We support the inclusion of chlorine-containing disinfectant as a hazard-based control measure against <i>Campylobacter</i> and <i>Salmonella</i> spp. in Chicken meat.	<ol style="list-style-type: none"> 1. The Joint FAO/WHO Expert Meeting (2008) on Benefits and Risks of the use of chlorine-containing Disinfectants in Food Production and Processing recommended that disinfectants be used within the framework of good hygienic practice, with a system based on hazard analysis and critical control points where applicable and with adequate process controls in place. 2. The public health benefits of using chlorine far outweigh the risks 3. Currently we are unaware of any feasible and affordable alternative measure 		
4		<p>Section 9.1.1 GHP-based control measures, paragraph 47</p> <p>We propose that the sentence in paragraph 47 be reconstructed to read : <i>“ Conditions that minimize stress to chickens should be observed e.g dim lighting, minimal handling and avoiding delays in</i></p>	There is the need to reword the sentence in order to highlight more clearly the food safety implications of stressing chicken which may lead to inadvertent contamination by <i>Campylobacter</i> and <i>Salmonella</i> spp. thereby compromising		

		<i>processing”</i>	Good Hygienic Practices and resulting in cross contamination of carcasses.		
		<p>Section 10.4.1.1 Retail, Paragraph 102</p> <p>The last sentence in paragraph 102 which reads: <i>“ Retailers may also provide customers with the means to sanitise hands after handling raw chicken meat packs”</i> may not be practicable, sustainable and easy to implement.</p>	<p>1. Chicken meat may not be the only source of contamination since other retail products may also carry <i>Campylobacter</i> and <i>Salmonella</i> spp. that may also be sources of contamination.</p> <p>2. Good Retail Practices especially packaging of chicken in leak-proof material to prevent leakage and direct contact with hands is recommended in addition to consumer education.</p>		
5	Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food at step 3) CX/FH 10/42/5	<p>Section 4.4.4.2</p> <p>We propose to change the sentence in section 4.4.4.2 to read: <i>“In addition: Hand washing facilities with non-hand operatable taps should be within close vicinity of the toilet and positioned so that the employee must pass them while returning to the food handling area. Hands should be washed with liquid antiseptic soap under running water. Hands should be dried preferably with disposable</i></p>	<p>The initial provision in section 4.4.4.2 which reads: <i>“In addition: Hand washing facilities should be within close vicinity of the toilets and positioned so that the employee must pass them returning to the food handling area. Hands should be lathered with soap then washed for a minimum of 20 seconds with running water. Hands should be dried preferably with disposable (paper) towels for a further 20 seconds. This should be encouraged, as it is the most effective way to eliminate viruses and where possible, non-hand operatable taps should be available to help prevent re-contamination of clean hands.”</i> is too prescriptive.</p> <p>1. The use of hand operatable taps is</p>		

		<i>(paper) towels.</i>	<p>necessary to prevent cross contamination</p> <ol style="list-style-type: none"> 2. The use of antiseptic soap is necessary to ensure both washing and disinfection of hands 3. The prescribed time for lathering and drying of hands (20-seconds) is prescriptive, hinders innovation and not practicable 		
5		<p>Section 5.1.1 We propose to delete the bullets indicating specific areas of risks for virus contamination under section 5.1.1</p>	<p>The specific areas for contamination have been already covered in Section 7 – Establishment: Personal Hygiene (CAC/RCP 1-1969)¹. The deletion is suggested to ensure consistency with Codex text and to avoid duplication.</p>		
5		<p>Section IX We propose that “consumer education” be introduced into the sentence for it to read: <i>“Countries should give consideration to consumer education and labelling of certain ready-to-eat foods so that consumers can make an informed choice with regard to these products and are adequately informed about the risks associated with</i></p>	<ol style="list-style-type: none"> 1. The level of education of some consumers may not allow them to read and understand the product information. 2. The primary responsibility of ensuring food safety should not be passed on to the consumer. 		

¹ CAC/RCP – Recommended International Code of Practice – General Principles of Food Hygiene

		<i>the consumption of these products, raw or lightly cooked, that may be contaminated with viruses during production.”</i>			
6	Proposed Draft Revision of the Code of Hygienic Practice for collecting, Processing and marketing of Natural Mineral Waters	<p>Section 2.3 Definition We propose that the definition for “Perimeter of Protection/Protection Zone” be revised to include “<i>animal activities</i>” The sentence should read:</p> <p><i>“Area where human and animal activities need to be monitored and managed to protect the water from contamination.”</i></p>	Animals may be source of zoonotic disease agent which may contaminate the source of water thereby compromising public health and safety.		
6		<p>Section 3.3.2 Storage at the point of extraction</p> <p>Paragraph 29</p> <p>Replace the sentence in the first bullet which reads “<i>The reservoirs should be protected from environmental contamination (be enclosed, and with air filters (pore size of 0.45µm or less recommended) etc)</i>” with the following:</p>			

		<p><i>“The reservoirs should be enclosed in order to be protected from environmental contamination. Air entering the enclosure should be filtered”</i></p> <p>Delete the phrase “ and to avoid stagnant water” in the second bullet which reads <i>“Water should be stored for a time as short as possible, in order to minimize potential for contamination and to avoid stagnant water.”</i> and replace with the following:</p> <p><i>“Water should be stored for as short time as possible in order to minimize potential for contamination.</i></p>	<p>The prescribed filter size of 0.45µm may limit better filtration systems which may deliver safer results. Additionally enclosure of reservoirs will give adequate protection against contamination from the environment.</p> <p>The essence of ensuring a short time for water storage is to avoid stagnant water which may lead to contamination. Hence the emphasis should be on contamination.</p>		
6		<p>Section 4.4.8 Storage</p> <p>The sentence in paragraph 50 should be reconstructed to read:</p>			

		<p><i>“Different packaging materials should be stored separately from each other”</i></p> <p>The sentence in paragraph 51 should be reconstructed to read: <i>“Packaging materials should be stored in a clean and dry area away from any chemical and other non-packaging material items.”</i></p> <p>We propose to introduce a new paragraph i.e. paragraph 52 which reads: <i>“The storage room for packaging material should be free of pest”</i></p> <p>The numbering for subsequent paragraphs should change accordingly.</p>	<p>To stress the importance of preventing cross contamination</p>		
6		<p>Section 5.2.2.2 Treatment</p> <p>We propose to delete the last sentence in paragraph 63 which reads “</p> <p><i>“Any treatment of natural mineral waters may</i></p>			

		<p><i>introduce the possibility of contamination. Therefore, approved treatments, which are part of the process, should be subjected to HACCP principles. A monitoring program for treatment risks should be put in place”</i></p> <p>The sentence will now read:</p> <p><i>“Any treatment of natural mineral waters may introduce the possibility of contamination. Therefore, approved treatments, which are part of the process, should be subjected to HACCP principles.”</i></p>	<p>Any effective HACCP Plan should include monitoring as part of the implementation. The statement in the original sentence is therefore superfluous.</p>		
6		<p>Annex I: Microbiological Criteria</p> <p>There is the need to revise the expression of results in the columns under “m” and “M” of the 2-Class Sampling Plans indicated in Table 1 and Table 2.</p>	<p>The expression of Colony Forming Unit (CFU) in columns m and M of the 2-Class Sampling Plan in both Table 1 and Table 2 does not conform to standard expression of results. For example “n.d” in 250ml should be expressed as “0”.</p>		
7	Proposed Draft Revision of the	Paragraph 31 (bullet 5) of the Report of the	The safety of foods of animal origin is directly dependent on the wholesomeness of		

	<p>Principles for the Establishment and Application of Microbiological Criteria for Foods (at step 3) CX/FH 10/42/7</p>	<p>Working Group We note the request for advice by the Physical Working Group which drafted the “Draft Revision of Principles for Establishment and Application of Microbiological Criteria for Foods” whether provision should be made for Microbiological Criteria for animal feed. We recommend that Microbiological Criteria be established to cover animal feed.</p>	<p>the animal feed. Therefore establishment of Microbiological Criteria for animal feed would ensure consumer protection.</p>		
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