

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 4, 6 and 7b

ASIA/19 CRD15

JOINT FAO/WHO FOOD STANDARDS PROGRAMME FAO/WHO COORDINATING COMMITTEE FOR ASIA

Nineteenth Session

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COMMENTS OF MALAYSIA

Agenda Item 4 Revitalisation of FAO/WHO Coordinating Committees Proposals on Strengthening the Role and Platform of RCCs

Malaysia has some concerns with the proposal to replace the RCC Circular Letter with an on-line data and information collection system to be integrated into the Codex website, mentioned in paragraph 27.

Should such a system be introduced, we are of the view that there is a need to develop a mechanism in order to ensure the continuity and sustainability of the system since the hosting of RCCs among member states is non-permanent and short-termed. Subsequently, some guidance on the function of Regional Coordinator in this regard needs to be included in the TOR of RCC. Additionally, members should also agree on what type of data or information to be shared on the system.

Agenda Item 6 Draft Regional Standard for Non-Fermented Soybean Products

1. Proposal to revise Section 8.2 to read "If genetically modified soybean is used in the process, consideration should be given to the *Compilation of Codex texts relevant to the labeling of foods derived from modern biotechnology* (CAC/GL 76-2011)"

Malaysia's Comment: *It should be noted that national legislation on labeling of Genetically Modified Food varies among countries. Thus, we propose to retain the section as below:*

"If genetically modified soybean is used in the process, it shall be indicated in the label in accordance with national legislation."

2. Food Additive Provision for "Composite/Flavoured" Soybean Milk

We note that the proposed maximum level for Sucrose esters of fatty acid in this proposed draft standard is 20000mg/kg while the level proposed in the Information Document to the discussion on GSFA at CCFA is 500mg/kg. The inconsistency could affect the work in progress at CCFA.

Agenda Item 7b Proposed Draft Regional Code of Hygienic Practice for Street-Vended Foods

General Comments:

Malaysia thanks India for its work on the proposed draft Code of Practice and is pleased to provide further comments on the document.

Malaysia notes and appreciates that various relevant references have been used in preparing the draft. However, we are of the view that Codex standards and related texts should not make reference to any specific national legislation.

Specific Comments:

- (1) SECTION 1 – OBJECTIVES

This Code of Hygienic Practice will also aim at helping the relevant authorities in improving the level of hygiene of these food preparation and vending processes in way that guarantees safe, ~~healthy and nutritional~~ foods to the consumers, in accessible locations.

Malaysia's Comments: *We propose to delete " , healthy and nutritional" as the scope of the Code of Practice for Hygiene does not cover health and nutrition aspects of foods.*

- (2) SECTION 2 – SCOPE, USAGE AND DEFINITIONS

2.1 Scope

7. This Code of Hygienic Practice defines the general hygienic requirements, and recommended practices and raising awareness generation on hygiene aspects of street foods as well as trainings concerning the preparation and sale of street foods, which will be useful for all stakeholders viz Vendors, Customers, authorities, voluntary agencies etc.

Malaysia's Comments: We propose to delete “, which will be useful for all stakeholders viz Vendors, Customers, authorities, voluntary agencies etc.” as we feel that it is not necessary to be included in the text, as it is redundant.

2.3 Definitions

Contaminant³

Any substance not intentionally added to food or feed for food-producing animals, which is present in such food or feed as a result of the production (including operations carried out in crop husbandry, animal husbandry and veterinary medicine), manufacture, processing, preparation, treatment, packing, packaging, transport or holding of such food or feed, or as a result of environmental contamination. The term does not include insect fragments, rodent hairs and other extraneous matter

³Refer to Food Safety & Standards Act, 2006, India.

Malaysia's Comments: We propose to replace the existing definition with the definition of contaminant as defined in the Codex General Principles of Food Hygiene (CAC/RCP 1-1969) to make it more relevant; and to replace the reference in footnote 3 with Codex General Principles of Food Hygiene (CAC/RCP 1-1969).

The new definition will read as:

“Contaminant - any biological or chemical agent, foreign matter, or other substances not intentionally added to food which may compromise food safety or suitability.”

(3) SECTION 3 – GENERAL REQUIREMENTS

3.3 Conditions for Registration

13. No relevant authority should issue or renew the registration of any street food vendor who does not commit himself/herself to comply with all the requirements of the Code of Hygienic Practice established by the relevant authority.

14. It is essential that basic training in food hygiene is carried out by the relevant authorities prior to issuing or renewing the registration of street food vendors.

Malaysia's Comments: We propose to delete paragraph 3.3, as we feel that it is not necessary to be included in the Code of Practice. Different country has different ways of managing the street vendors.

3.6 Coordinating Committee on Street Food

20. Coordinating Committee on Street Food may be constituted by the relevant authority and should provide advisor(s) to facilitate the enforcement of the Code of Hygienic Practice that have been developed. The advisor should be proficient and have long standing experience of working with street foods in planning and implementation. Advisor(s) should perform the following functions:

- i. Plan and Coordinate various programs on street foods being organized relevant authority;
- ii. Participate in the design and/or delivery of the formal training of vendors this is to be provided by the relevant authorities in view of issuance and renewal of registration/licenses;
- iii. Help street food vendors in interpretation of Code of Hygienic Practice;
- iv. Work with vendors offering them on-site advice and guidance to improve their operations in accordance with the requirements of the Code of Hygienic Practice;
- v. Help in trainings and consumer awareness generation of all stakeholders viz vendors, consumers, authorities, Non-Governmental Organizations (NGOs), agencies etc.
- vi. Work in close collaboration with the enforcement personnel, including the officers in charge of registration and renewal of licenses, so that the Code of Hygienic Practice is well understood and correctly applied;
- vii. When applicable, train the enforcement personnel and regularly organize joint inspections to monitor progress in the application of the Code of Hygienic Practice; and
- viii. Inform customers as per section 3.7 of these Code of Hygienic Practices.

~~21. The Advisor(s) should be selected carefully who have experience on working with street foods, are good communicators, familiar with the requirements of the Code of Hygienic Practice, and have good understanding of the problems of the vendors and the protection of consumers.~~

~~22. The advisor(s) should be as far as possible conversant with the Code of Hygienic Practice – General Principles of Food Hygiene (CAC/RCP 1-1969), including the Hazard Analysis Critical Control Point (HACCP) System and Guidelines for its Application (Annex to CAC/RCP 1-1969) in order to assist vendors to optimize the use of scarce resources.~~

Malaysia's Comments: *We do not see the need to establish a committee on this matter, as we trust that these activities are duly undertaken by the relevant authorities. Therefore, we propose to delete paragraph 3.6.*

3.7 Customer awareness

~~25. Customers should take active part in maintaining safety and hygiene of street foods.~~

~~26. This would require the following basic steps:~~

~~i. Hygienic Behaviour is a must for all customers when they visit street food stalls viz. throw garbage in identified bins; do not spill dirty water; do not put bags etc. on the food counters; do not touch displayed food; do not smoke, chew tobacco, spit, cough etc. near the food; do not speak on mobile while eating; keep the area clean, etc.~~

~~ii. Have required awareness on what to observe to ensure hygienic behaviour of vendors; safe handling of food and water and safety of food being served.~~

~~iii. Be informed whom to report so that they can report to the concerned authorities if they note anything amiss affecting quality of food, water and environment.~~

~~iv. Take active part in training of customers in maintaining the street food hygiene and the surroundings clean.~~

~~v. Customers should also be informed of their responsibility in ensuring that they do not contaminate, dirty or litter street food vending sites.~~

Malaysia's Comments: *We propose to delete paragraph 3.7, as in our view, this information is irrelevant and beyond the scope of the Code of Practice.*

(4) SECTION 7-FOOD PREPERATION/ HANDLING

4.3 Training of Street Food Vendors

~~32. The timing of conducting these trainings is important as the Street food vendors usually start business in the morning and continue till evening. Therefore, classes may be convened either early in the morning or late in the evening to ensure maximum participation. The training material given to them should be pictorial with less of texts. The key messages should be reinforced in short and crisp messages (Annex) and also delivered in local language. The training material may be water proof so that they can refer to it/ keep it/hang it on their food vending cart/stall too. Information Education Communication (IEC) material developed based on scientific knowledge and know-how should be used, preferably developed by experts having past hands on experience, with help of relevant authority or experienced Non-Governmental Organization's~~

Malaysia's Comments: *We propose to delete paragraph 32. We trust that these activities are duly undertaken by the relevant authorities and therefore would not be necessary to be included in the Code of Practice.*

B. Street Food Centres

Malaysia's Comments: *We propose to add a new paragraph before paragraph 43, on the suitable location for street food centres.*

The new paragraph would read as follows:

"Street food centres should be located in areas designated by the relevant authorities. It should be located away from areas which are prone to pest infestation and are potentially a threat to food safety such as environmentally polluted areas, waste disposal areas and animal habitat and husbandry areas (abattoirs, wet market)".

7.2. Requirements for water and Ice

~~79. One of the most critical problems in street food vending is the supply of water of acceptable quality and in sufficient quantities for drinking, washing, cleaning and other operations. The ambulant vendor can carry only limited supplies and even stationary food stalls may not have direct access to a water supply.~~

~~Indeed, water is generally scarce in low-income areas in most developing countries. Water taps may run only for a few hours during the day. Street vendors in various parts of the world are known to wash their utensils, including those in which food has been served, in water which has been used previously, perhaps many times. Therefore, water supply needs close attention in street food operations. This is particularly true if contaminated water may be added to a food or applied to utensils without subsequent step (e.g. heating or chemical sanitizing) to eliminate or reduce the potential hazards to an acceptable level.~~

Malaysia's Comments: *We propose to delete paragraph 79 as we feel that such detailed elaboration is not necessary to this Code of Practice.*

7.5. Serving food

96. Every vendor should observe the following:

xiii. Food and beverages should be protected in appropriate cases e.g. Acrylic/protected glass cases, covered with bell-shaped wire-net or plastic covers (min. height 60-70 cm from ground) and stored in clean utensils.

Malaysia's Comments: *Malaysia would like to seek clarification on the statement in brackets which reads: "(min. height 60-70 cm from ground)". Does the height refer to the distance from ground to the bell-shaped wire-net or plastic covers; or does it refer to the height from ground to the place where food is being served?*

7.6. Unsold Food

97. All unsold food and beverages ~~that cannot be properly preserved~~ should be hygienically disposed of at the end of the day.

Malaysia's Comments: *Malaysia proposes to delete the words "that cannot be properly preserved", as it could be interpreted in different ways. We are of the view that in any case, unsold food and beverages should be disposed at the end of the day.*