



Food and Agriculture
Organization of
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Organization

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COMMENTS ON THE PROPOSED DRAFT REGIONAL CODE OF HYGIENIC PRACTICES FOR THE STREET-VENDED FOODS

(N05-2013)

(Comments from Republic of Korea and Thailand)

REPUBLIC OF KOREA

General Comments

To be consistent with the objectives used in the Regional Code of Hygienic Practice for Street-vended Foods, this document is required to focus on hygienic aspects which should be taken into consideration in reality.

This draft covers some details which are not considered as relevant hygienic aspects, such as positive behavior to customers, food vendor associations and rating/grading.

Some requirements on appliances/equipments and water quality monitoring in the draft are required to discuss within the region whether it can be applied in reality.

It is also required to add hygienic practices after business hour, such as appropriate placement of stalls/carts in order to prevent from pests, contamination and/or adulteration.

THAILAND

INTRODUCTION –PROBLEM RELATING TO STREET – VENDED FOODS

Introduction should be clear and concise, for example the paragraph 3 on problems relating to street-vended food, so Thailand would like to suggest some amendment should be made to this section.

SECTION 2 – SCOPE,USAGE AND DEFINITION

We would like make some amendments to the scope. Scope should be clearly defined such as the function of the Authority, street vendors and street center. So, Thailand would like to add the sentence “This code also provides recommendation for authority and other related agencies” in the last sentence of this paragraph.

SECTION 2.3 DEFINITION

We are of the opinion that the definition should be aligned with the Procedure Manual of Codex such as the definition for contaminant.

SECTION 3 – GENERAL REQUIREMENTS

3.4 Display of notice

We would like to propose deletion of this section. We are of the view that this provision is too stringent. Moreover, the regulations and/or procedures for monitoring or inspecting of street-vended food are different among member countries. Each competent authority, then, should set his own requirements based on his regulations.

3.6 Coordinating Committee on Street Food

This section should be taken as a guideline for the Coordinating Committee on Street Food because the requirements should depend on the regulation and local practice of each country.

SECTION 4- STREET FOOD VENDORS

4.1 Health condition of the street food vendor

Paragraph 27 is difficult in practice, so Thailand would like to rewrite this paragraph to be read as follow: "Street Food vendor, assistant or food handle, if showing any of the following symptoms: jaundice, diarrhea, vomiting, fever, sore throat with fever, discharge from ear, eye and nose, visibly infected lesions (boils, cuts, etc.) should not involve in any food handling activity."

4.2 Personal hygiene and behavior

Thailand would like to amend the first dot of paragraph 30 to be read as follow: "Where appropriate, wear clean protective clothing and hair covering and clean gloves; while handling food."

We would like to propose the deletion of last dot. "~~Have a positive and helpful behavior towards customers and authorities.~~"

4.3 Training of Street Food Vendors

Clarification may be needed on the function of the authority whether they are required to provide the training. We are of the opinion that the authority should be separated from the training provider.

SECTION 5 LOCATION, DESIGN AND STRUCTURE

5.1 Location and Design

At the last sentence of the paragraph 34, we would like to propose the following amendments "They should be airy, well lighted and be sited away protected from direct sunlight, kept clean and maintained in good conditions to avoid and risk of contamination in the food"

Thailand would like to amend the paragraph 41 to be read: "Rubbish bin should be covered, made of impermeable material, easy to clean and provided with a plastic bag inside ~~and also has pedal foot.~~"

Rationale: These requirements are more practical but still take into account food safety.

5.2 Structure

A. Street Food Stalls/Carts

- Paragraph 45, the term of "food grade" we would like to seek clarification, who are the inspection body or what are the methods of testing.

- Paragraph 46, we would like to amend this paragraph to be read "All cooking rages, washing equipment, working tables, shelves and cupboards (should be hygienic impermeable, easy to clean like stainless steel) on or in which food is placed should be at least 45 cm above the ground and food contact surfaces should be hygienic, impermeable, easy to clean (like stainless steel), at least 60 cm from ground."

- Paragraph 53, we would like to rewrite this paragraph as follow "(e) provide centralized or individualized appliance, crockery, utensil and other implement washing facilities, equipped with hot ~~and cold~~ running potable/clean water, wash basins or sinks....."

Rationale: Appropriate practice for the street vendor. However, this guideline still takes into account food safety.

C. Water Quality monitoring

We would like to seek clarification on the necessity of water quality monitoring, such as monitoring every 3 hours.

SECTION 7- FOOD PREPARATION AND HANDLING

7.1 Requirements for ingredients

- Paragraph 78, we would like the deletion the item "~~(ii) The food handling method employed should be such as to minimize the loss of nutrients~~"

Rationale: The scope of this guideline does not cover nutrition.

- Paragraph 88, we would like to propose the deletion of item (i) and (ii) and amended this paragraph as follows:

i. ~~A refrigerator or purpose-built thawing cabinet maintained at a temperature of 4°C²; or~~

~~ii. A commercial microwave oven only when the food will be immediately transferred to conventional cooking units as part of a continuous cooking process or when the entire, uninterrupted cooking process takes place in the microwave oven.~~

The guideline should refer to the general requirement so that the vendors can choose any method suitable to them.

Rationale: The specified methods of thawing are too strict and not practical.

Thawing is for preventing the growth of pathogenic microorganism whatever any thawing approach is applied.

- Paragraph 90, we propose to add the last sentence of this paragraph ,so this paragraph to be read as follows: "Street food prepared but not sold within 2-4 hours, may be reheated. However, the frequency, time and temperature of re-heating depend on the type of street-vended food. Food should not be reheated more than once and only the portion of the food to be served should be re-heated. A temperature of at least 75 °C should be reached in the centre of the food within one hour of removing the food from refrigeration. Cooked food should be cooled down below 20 °C as soon as possible and be kept below 10 °C in well ventilated place or in icebox."

Rationale: We are of view that the frequency, time and temperature of re-heating street-vended food depend on the type of food.

SECTION 8- AUTHORITY

We are of the opinion that the requirement of the authority is depend on the regulations and local practice of each country. So, the requirement of this section should be flexible for practical of each country.

SECTION 9- RATING/GRADING OF STREET FOOD VENDORS

This draft code sets the general hygienic requirements and/or recommended practices for street-vended food, rating and grading of street food vendors depends on practical and preferred of each country. Consequently, we propose to delete this section.