

SUMMARY OF RESPONSES BY MR AWJ PRETORIUS, DIRECTOR: FOOD CONTROL, DEPARTMENT OF HEALTH, TO CONCERNS RAISED BY PROVINCES AT THE MEETING OF THE NCOP SELECT COMMITTEE ON SOCIAL SERVICES HELD ON 11 OCTOBER 2006 AT THE GARDEN COURT EASGATE HOTEL

PROVINCE	CONCERNS RAISED	RESPONSE
Limpopo	1. A body dealing with analyses of samples.	Clause 3 only deals with the payment for samples for further analyses. Section 12 of the principal Act already provides for the DG to authorise analysts.
	2. Feedback on sample results.	Clause 3 only deals with the payment for samples for further analyses. It is common practice for laboratories to provide feedback to the relevant health authorities on the results of the analyses of samples submitted by them.
Gauteng	1. Tinned foods on expiry dates sold at spaza shops.	R918* already provides for the safety of tinned foods, irrespective of where it is sold, date markings (expiry dates) are provided for in the new draft food labelling regulations currently under consideration by the Minister. Regarding the monitoring aspect, please also refer to the response under point 5 below.
	2. Access to waste food	The principal Act and therefore the Bill in question deals with the sale, manufacture, importation and exportation of foodstuffs, waste management is addressed under the Environmental Management Act of DEAT and local authorities, including the municipal health services rendered by metro/district municipalities are responsible for the control at waste dumping sites, including the prevention of waste food being removed.
	3. Training of SMME's and street vendors	The principal Act and therefore the Bill does not address training as a core function of the Department. R. 918* already makes provision for the person in charge of a food premises to provide appropriate training to food handlers in his/her employ. Several health authorities at municipal level has implemented training programmes for street vendors selling foodstuffs to, among others, assist them to comply to the minimum requirements in terms of R.918*. Attached, please find a scientific article in this regard, (the author, Ms FM Makhoane is a Deputy Director currently employed in the Directorate: Food Control).
	4. Consultation with municipalities on the	It is on record that when the Bill was initially published for comments in 2003,

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	inspectors by the provinces/municipalities	provinces with regard to imported foodstuffs and metro/district municipalities with regard to, among others, the enforcement of food legislation related to the manufacture, sale and otherwise, handling of food within their areas of jurisdiction. The purpose of the Bill is therefore to, among others, strengthen the ability of the mentioned health authorities to carry out their existing responsibility related to food control more effectively with regard to aspects such as the authorization of inspectors, the dissemination of information, etc.
	3. A proposal that the Bill should include a provision that all regulations that the Minister has the power to publish in terms of the Act/Bill be submitted to the NCOP Committee before it is finalised.	The Directorate: Food Control has its reservations regarding this proposal, firstly the regulations concerned are of a highly technical nature, such as levels of additives, pesticide residue's etc. permitted in foodstuffs, microbiological standards, etc. The Department will not be in a position to brief and/or advise the NCOP Committee on each and every regulation it deals with due to limited resources and time constraints. Secondly, it is envisaged that such a situation will result in an unacceptable timeframe for the finalization of regulations, which will seriously impact on the relevant health authorities to protect consumers against unsafe foodstuffs, as well as jeopardising the country's economy with regard to the export of foodstuffs.

* Regulations Governing the General Hygiene Requirements for Food Premises and the Transport of Food (R. 918 of 1998)

available, inexpensive, nutritional meals, while providing a source of income for the vendors, although several concerns were raised over their safety and quality (Bryan et al., 1988; Dawson and Canet, 1991; Bryan et al., 1997; Moy et al., 1997; Mosupye and von Holy, 1999). However, despite the concerns raised and the fact that in many countries street food vending was regarded as illegal, the sector experienced significant growth during the past few decades, due to socio-economic changes in many countries, including South Africa. Today, street food vending in South Africa is probably the single largest employer in the informal sector and possibly one of the major contributors to the South African economy. This article aims to provide information on the efforts made by universities and health authorities in South Africa to document and improve the microbiological safety and promote the sale of street-vended foods in various South African cities.

2. Initiatives by universities to determine the microbiological safety of street-vended foods

Until the late 1990s there was limited scientific data on the microbiological quality and safety of street-vended foods in South Africa, while information was already available in other developing countries such as Zambia, Nigeria, Pakistan and the Dominican Republic (Bryan et al., 1992, 1997; Ekanem, 1998; Umoh and Odaba, 1999). As a result, it was generally perceived, in South Africa, that food produced and sold on the street in an informal setting was unsafe. Studies by Mosupye and von Holy (1999, 2000) were possibly the first comprehensive scientific research into the safety of street-vended foods in South Africa. Initial work comprised a study conducted to gain an overall indication of the microbiological safety of ready-to-eat street-vended foods sold in the typical South African setting of a major taxi rank in the Johannesburg Central Business District (Mosupye and von Holy, 1999). This study was a survey during which random samples of ready-to-eat salads, meat dishes and gravies were collected and analysed for, amongst others, aerobic bacterial counts, coliform counts and the presence of foodborne bacterial pathogens. The results obtained from this survey were compared to the results reported in similar studies conducted in other countries (Bryan et al., 1988, 1997; Ekanem, 1998; Umoh and Odaba, 1999). The results were also considered in comparison to environmental conditions under which the street food vendors were noted to operate in Johannesburg (Mosupye and von Holy, 1999). This study concluded that the production of relatively safe street-vended foods, with low bacterial counts, was possible even under improper hygiene conditions and a lack of basic sanitary facilities.

A follow-up study was conducted to determine the potential microbiological hazards associated with food preparation and holding by some of the street food vendors that were involved in the initial study (Mosupye and von Holy, 1999). This study also aimed to identify potential critical control points that resulted in the acceptable microbiological quality and safety of street-vended foods in Johannesburg (Mosupye and von Holy, 2000). A total of 132 samples of beef, chicken, salad and gravy were collected over 11 replicate surveys. As in the previous study, water and surface swab samples were also collected. For each food type, samples

were collected during preparation (i.e. raw materials and during cooking) and holding. The same microbiological analyses as in the initial survey were conducted (Mosupye and von Holy, 1999). In this study, cooking at temperatures exceeding 65 °C and short holding times were identified as the critical control points, which resulted in lower bacterial counts and lower incidences of foodborne pathogens in comparison to other studies. The study documented common practices among the street food vendors in Johannesburg that enacted those critical control points. According to the study, vendors prepared their meals fresh every day. Raw materials were always purchased from formal retailers each morning and only in amounts that would be prepared and sold on that same day. The food would be prepared and sold within 6 h, at which point the vendors would wash up and go home. In the event that food was left over that food would either be given to the homeless on the street or taken home for consumption by the family. Very few vendors re-sold leftovers and those that did produced food that was microbiologically less acceptable. The study, however, also revealed a potential risk of preparing unsafe foods due to cross contamination and recontamination of cooked products. Re-contamination of ready-to-eat foods resulted, in most cases, from the use of cooking utensils that were not thoroughly cleaned. The study indicated that these utensils may have been contaminated by the dishwater when they were washed. By the time food was ready to be served the dishwater was highly contaminated, because it was not regularly changed (Mosupye and von Holy, 2000). This study revealed that although street vendors could produce and sell relatively safe food, there was still a need for basic sanitary facilities, such as running water and toilets.

The most recent work conducted on street food vending in South Africa was conducted in the Free State Province, in the city of Bloemfontein (Lues et al., in press). In this study the microbiological quality of the food sold and the hygienic conditions under which vendors operated were assessed. The microbiological quality of the foods sampled was compared to existing food safety guidelines. This study found that, overall, the microbiological quality of foods from which samples were taken was within acceptable safety limits, but that the presence of *Escherichia coli*, *Staphylococcus aureus* and *Salmonella* was indicative of a degree of ignorance of the foodhandlers (at the vending sites) and a cause for concern. The study therefore concluded that even though the bacterial levels detected in the food were below the set guideline limits, it was still required that the local authority in that area intervene through health education actions to preclude problems developing, and to ensure that the standard of safety of street-vended foods is the best attainable at the time of sale and consumption.

3. Initiatives by food control authorities to improve street food vending in South Africa

The data produced in the studies by Mosupye and von Holy (1999, 2000) and Kubheka et al. (2001) were also used as relevant information by the Department of Health when coordinating an FAO Technical Cooperation Programme (TCP) project on Improving Street Foods in South Africa (Martins and Anelich, 2000).

and re-printed and re-distributed nationwide by the National Department of Health as part of the TCP project (Martins and Anelich, 2000). In addition, regular inspections of street food vending premises are conducted and food samples are collected for microbiological analysis.

4. Conclusions

Improving the safety of street-vended foods in any developing country poses great challenges. The experiences in South Africa have shown that prior to any efforts being made to improve street food vending, baseline research needs to be conducted to determine the safety and socio-economic importance of street-vended foods. One of the major driving forces towards efforts to improve street food vending is the contribution that street food vending makes to the country's economy. For South Africa, however, the finding that the food produced and sold on the street was relatively safe despite the unfavourable conditions in which the vendors operated, played some part in motivating the local authorities to change their perception on street food vending and embark on strategies to effectively control this sector. South Africa's experiences also proved that success in this regard can only be ensured where food control authorities, street food vendors and all other stakeholders, including academic structures, collaborate to improve the sector, with all stakeholders having a clear understanding of their roles and responsibilities.

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References

- Anon., 1996. World Health Organisation. Essential Safety Requirements for Street-vended Foods (Revised Edition). WHO/FAO Food Safety Unit – Division of Food and Nutrition, Geneva.

- Anon., 1999. Regulations governing general hygiene regulations and the transport of food. R. 918 of 1999, as promulgated under the Health Act, 1977 (Act 63 of 1977).
- Anon., 2000. Economic Development Department, Durban Unicity. Working Durban, a summary of Durban's new informal economic policy.
- Bryan, F.L., Michanie, S.C., Alvarez, P., Paniagua, A., 1988. Critical control points of street-vended foods in the Dominican Republic. *Journal of Food Protection* 51, 373–383.
- Bryan, F.L., Teufel, P., Rinz, S., Rooh, S., Qadar, F., Malik, Z., 1992. Hazards and critical control points of vending operations at a railway station and bus station in Pakistan. *Journal of Food Protection* 55, 534–541.
- Bryan, F.L., Jermini, M., Schmitt, R., Chibiyu, E.N., Mwanza, M., Motoba, A., Mfume, E., Chibiyu, H., 1997. Hazards associated with holding and reheating foods at vending sites in a small town in Zambia. *Journal of Food Protection* 60, 391–398.
- Dawson, R.J., Cuner, C., 1991. International activities in street foods. *Food Control* 2, 135–139.
- Ekanem, E.O., 1998. The street food trade in Africa: safety and socio-environmental issues. *Food Control* 9, 211–215.
- Kubheka, L.C., Mosupye, F.M., von Holy, A., 2001. Microbiological survey of street-vended salad and gravy in Johannesburg city, South Africa. *Food Control* 12, 127–131.
- Loos, J.F.R., Raschke, M.R., Venter, P. and Theron, M.M., in press. Assessing food safety and associated food handling practices in street food vending. *International Journal of Environmental Health Research*.
- Martins, J.M., Anelich, L.E., 2000. Socio-economic features of street food vending, hygiene and microbiological status of street foods in Gauteng, 2000. Technical Cooperation Programme (TCP) Project on Improving Street Foods in South Africa. TCP/SAF/8924(A). Food and Agricultural Organization of United Nations, Rome.
- Mosupye, F., von Holy, A., 1999. Microbiological quality and safety of ready-to-eat street-vended foods in Johannesburg, South Africa. *Journal of Food Protection* 62, 1278–1284.
- Mosupye, F.M., von Holy, A., 2000. Microbiological hazard identification and exposure assessment of street food vending in Johannesburg, South Africa. *International Journal of Food Microbiology* 61, 137–145.
- Moy, G., Hazard, A., Käferstein, F., 1997. Improving the safety of street-vended food. *World Health Statistics Quarterly* 50, 124–131.
- Umoh, V.J., Ogburn, M.B., 1999. Safety and quality evaluation of street foods sold in Zaria, Nigeria. *Food Control* 10, 9–14.