

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 4

CRD11

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

#### Forty-ninth Session

Chicago, Illinois, United States of America, 13 - 17 November 2017

#### COMMENTS OF INDONESIA

General Comments:

Indonesia appreciates the work done by the Electronic Working Groups and would like to thank the Codex Committee on Food Hygiene for the opportunity to provide these comments. In general we approved the documents that have been formulated but there are several items for recommendations

Specific Comments:

#### **Agenda Item 4 : PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CAC/RCP 1-1969) AND ITS HACCP ANNEX**

##### **Introduction**

We find that INTRODUCTION part well describes the relationship between GHP and HACCP.

Paragraph 4: We support option 4A with minor revision

Prerequisite Programmes (PRPs), which include Good Hygiene Practices (GHPs), Good Manufacturing Practices (GMPs), and Good Agricultural Practices (GAPs), as appropriate, lay the foundation for producing safe and suitable food. GHPs apply broadly to all food businesses ~~without the need for conducting a hazard analysis~~. Referring to external resources (existing models, references, standards, regulations, or Codes of Practice provided by the competent authority, Codex or food industry), it may be determined that GHPs are sufficient for some FBOs to control all food safety hazards. Yet, since not all hazards pose the same risk, there may be a need to pay particular attention to certain hazards determined as significant by a site-specific hazard analysis and to apply control measures ~~at critical control points (CCPs) and/or at places other than CCPs] OR [HACCP control measures]~~ within a Hazard Analysis and Critical Control Point (HACCP) system (see Comparison Table below). FBOs without the resources to carry out a hazard analysis may use external resources as listed above or generic HACCP plans provided by the competent authority or food industry<sup>1</sup>, subject to adaptation to the site].

Rationale: To accommodate the type of FBO's that vary in their capacity to apply GHP and HACCP, we recommend to delete the statement "without the need for conducting a hazard analysis". This is because the medium and large food industries should apply GHP and HACCP, while for small-scale food business operator do not have to conduct hazard analysis.

Places other than CCPs is deleted because the terminology of "places" is not clear rather confusing

Paragraph 7:

The *General Principles of Food Hygiene: Good Hygiene Practices (GHPs) and the Hazard Analysis and Critical Control Point (HACCP) System* aim to:

- provide principles and guidance on the application of good hygiene practices applicable throughout the food chain to provide food that is safe and suitable for consumption;
- provide guidance on the application of HACCP principles;
- clarify the relationship between GHPs and HACCP, taking account of the size and nature of the food business operation and the level of food safety risk; and
- provide the basis on ~~which sector and~~ product-specific codes of practice are established.

Rationale: the term of sector is not clear, because in the previous terminology we use food business operator.

Paragraph 12:

**Drainage[and waste disposal]**

12. Adequate drainage and, waste disposal systems and facilities should be provided and well maintained. They should be designed and constructed so that the risk of contaminating food or the potable or clean water supply is avoided. It is important that drainage does not flow from highly contaminated areas to areas where finished food is exposed to the environment]

Remove the square brackets

Rationale : Paragraphs 12-14 are about both drainage and waste disposal. This also retains the header in the current *General Principles of Food Hygiene*.

**General Principles**

Definitions

[To be developed based on terms used in Parts 2 and 3]; include here the definitions that already exist in the RCP-1, Section 2.3 to facilitate discussion on them.

Enhanced GHP [if this expression is retained]

Rationale: Definitions in the *chapter 2* is suggested to be inserted in the definition under general principle section.

Paraghrap 28-33 and paraghrap 36-37

Recommendation:

It should be discussed again by CCFH related to the contents of the paragraph. We suggest this paragraph be removed.

Rational: These are activities that have been associated with HACCP

Paragraph 40: Such systems should also specify tolerable limits for time and temperature variations. ~~[Critical]~~ Temperature recording devices should be checked for accuracy, and where appropriate calibrated at regular intervals.

Rationale: Critical is removed because all temperatures are important to observe and record.

Paragraph 41:

Formulation

41. The composition of a food, e.g. adding acids, salts, sugars or preservatives, can be useful in preventing growth and toxin production by microorganisms. When formulation is used to control foodborne pathogens (e.g., adjusting the pH or water activity to a level that prevents growth), systems should be in place to ensure that the product is formulated correctly.

Rationale: We recommend to delete because there is no product formulation to prevent the growth of microorganisms, there is only control the growth of microorganisms.