

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON CONTAMINANTS IN FOODS

Second Session

The Hague, The Netherlands, 31 March - 4 April 2008

PROPOSED DRAFT CODE OF PRACTICE FOR THE REDUCTION OF CONTAMINATION OF FOOD WITH POLYCYCLIC AROMATIC HYDROCARBONS (PAH) FROM SMOKING AND DIRECT DRYING PROCESSES

(N07-2006)

Comments at Step 3 submitted by Brazil and Japan

BRAZIL

Brazil thanks the efforts made by the working group, especially Denmark to redraft this document. Some remarks from the Brazilian delegation are following:

The document should follow the structure of Codex Code of Practice. We suggest to separate the background information and literature review from the Recommendation for Good Manufacturing Practices for the smoking Process (only with recommended practices).

The document should be restricted to issues regarding to Good Manufacturing Practices and should not include concepts related to HACCP and Risk Assessment.

The document should only deal with fuels and processes that are used in products traded internationally.

JAPAN

Japan appreciates the effort of the electronic working group led by Denmark in preparing the draft of Code of Practice and is pleased to offer the following comments.

Use of HACCP terms

1. The HACCP is defined in the Annex (Hazard Analysis and Critical Control Point System and Guidelines for its Application) to the Codex General Principles of Food Hygiene (CAC/RCP 1-1969) as "a system which identifies, evaluates, and controls hazards which are significant for food safety". Japan supports its application for the control of PAH in foods. However, the essential terms of HACCP, "hazard analysis" and "critical control point" meant differently in this Code from their definitions in the above mentioned Annex. These terms shall be used consistently throughout Codex in accordance with the existing Codex definitions, which are reproduced below for reference.

Definitions of "hazard analysis" and "critical control point (CCP)":

Hazard analysis: The process of collecting and evaluating information on hazards and conditions leading to their presence to decide which are significant for food safety and therefore should be addressed in the HACCP plan.

Critical Control Point (CCP): A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.

Below the list, although may not be exhaustive, shows terms to be corrected with regard to HACCP system. The inserted text is underlined and deleted text is struck-out.

Paragraph 29

The food producer should carry out a hazard analysis ~~of~~ and determine the critical control points ~~(HACCP)~~ in processes used or intended to be used in food production.

Paragraph 30

The hazard analysis ~~of the critical control points should include assessment of the potential formation of process contaminants during the process and should address the following points: is collecting and evaluating information on PAH and conditions leading to their presence to decide which are significant for food safety.~~

- ⇒ ~~Possible sources of contaminants such as PAH during the process~~
- ⇒ ~~Possible effects on consumer health~~
- ⇒ ~~Controllability~~
- ⇒ ~~Feasibility and effectiveness of controls (cost, commercial availability, occupational hazards)~~

Paragraph 47

~~Fuel and the critical control points:~~ Critical factors to be considered and recommendation on fuel.

(Similar modification is necessary for many other paragraphs including paras 49, 53, 64, 84.)

Paragraph 47. b

When other types of fuels like bagasse (from sugarcane), corn cob and coconut husk are used, the use should be ~~subject for a risk assessment~~ evaluated in light of PAH contamination.

Paragraph 83

The type and composition of fuel used in the drying process has an influence on the formation of PAH, but insufficient data are available to recommend specific fuels. It is recommended to conduct a ~~risk assessment (HACCP analysis)~~ hazard analysis of the fuel intended to be used, the actual process and foodstuffs to be dried.

This assessment should take into account the benefit of using filtering of the gasses.

Paragraph 84

The fuel used in drying processes may also affect the flavour of the final product, and this point is also relevant to consider.

~~Fuel used in the process and some critical points:~~ Critical factors to be considered and recommendation on fuel.

- a. ~~Conducting a risk assessment (HACCP analysis) of~~ The fuel used in contact with the foods to be dried
- b. The type and composition of fuel used to dry foods
- c. If woods are use, use hard wood rather than softwood and do not use woods treated with chemicals
- d. The use of other fuels: Avoiding the use of fuels as diesel fuel, waste products, especially rubber tyres, olive residues and waste oil which may already contain significant levels of PAH
- e. Influence on the taste of the final food.

2. The term “HACCP analysis” was used in paras 83 and 84 as a synonym to the term “risk assessment”. However, since the term “HACCP analysis” is not used or defined in the Annex to CAC/RCP 1-1969 and we have no knowledge about this term being synonymous to risk assessment, this term must not be used in this Code.

3. The term “risk assessment” in paras 83 and 84 is defined as one of the terms related to risk analysis in the “Codex Alimentarius Commission Procedural Manual” since 1995. Paras 83 and 84 talk about conducting risk assessment of the fuel. However, we think that at the industry level, it is more appropriate to require hazard analysis rather than risk assessment and therefore we propose that the term “risk assessment” in paras 83 and 84 should be replaced with the term “hazard analysis”.

Need for more detailed guidance

4. In order to make the Code internationally applicable, it should provide users with concrete advice on effective control of PAH levels in foods. The current draft contains many factors to be considered but without any concrete guidance on what is acceptable and what is not, and in the latter case, what should be done. Every factor to be considered should preferably accompany concrete guidance. Moreover, the third principle of the HACCP system is to establish “critical limits” (definition: a criterion which separates acceptability from unacceptability) for each critical control point. Therefore critical limits, whether numerical or not, should be established for the critical factors to the extent possible.

Proposal for amendment

5. We would like to propose to delete the term “generally” from the second line of para.46 in line with para.47d. There are a number of typo’s in the text. We are willing to provide the Secretariat with a hand-corrected version at the session.