



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

#### Forty-fourth Session

New Orleans, United States of America,

12 – 16 November 2012

Comments on the

**Discussion Paper on new work and periodic review/revision of codes of hygienic practice**

**Comments submitted by: European Union and Philippines**

#### EUROPEAN UNION

*Mixed Competence*

*Member States Vote*

The European Union and its Member States (EUMS) wish to thank Australia for preparing a comprehensive proposal for prioritising new work proposals.

In principle, the proposed "forward work plan" seems to provide a structured approach for prioritising new work and a useful tool for ensuring that previous proposals are not lost. However, the relationship of the new approach with previously agreed procedures to deal with new work at CCFH should be clarified. At the 43th session of CCFH the revised *Risk Analysis Principles and Procedures applied by CCFH* were agreed and subsequently approved by the 35<sup>th</sup> CAC. In addition, a separate document titled *Process by which CCFH will undertake its work* was inserted as an Appendix VI to the report of the 43th session of CCFH and adopted as an Annex to the Risk Analysis Principles by the 35<sup>th</sup> CAC. The new proposal overlaps at least partly with these documents.

Concerning the proposed criteria and associated weighting for prioritising the new work proposals, the EUMS question the validity of the criterion "Five years or more since developed". Standards may remain up-to-date even if they are old if the information in the standard remains current and there are no new technologies or data that supersede the original purpose. On the other hand, Standards developed less than 5 years before may need revising if new data and/or technologies become available.

The EUMS can agree with the forward work plan, as presented in Appendix 2 of the discussion paper, in the sense that the revision of the Code of Practice for Fresh Fruits and Vegetables (CAC/RCP 53-003) and the development of a code of hygienic practice for low-moisture foods are currently the top priorities for new work at CCFH. However, the application of the proposed prioritisation criteria for these work items seems somewhat inconsistent.

#### PHILIPPINES

A. The Philippines proposes that the weighting values on the Title of Work and Prioritization Criteria in Appendix 2, CCFH Forward Workplan be corrected as follows:

**Line 2, columns 3 and 7**

<b>From:</b>						
<i>Title of work (Date revised)</i>	<b>Prioritisation Criteria</b>					<b>Total</b>
	Public Health	New Information	Inconsistency	Trade Impact	5 Years or more since developed	
<i>Development of a code of hygienic practice for low moisture foods</i>	10 – still evidence of systems failures, e.g., spices/nuts; illness with these foods	5	<del>10</del> 5			<del>25</del> 20

**REASON:** The weighting value of 5 for the criterion “Inconsistency” is incorrect. The value in the table of criteria and associated weighting proposed and used by Australia in the discussion paper is 5. Hence, the total will also have to be corrected to 20.

B. The Philippines supports the following recommendations in the discussion paper prepared by Australia with inputs from New Zealand, Canada and the United States of America subject to the corrections suggested in foregoing Item A above:

1. The summary of CCFH considerations for New Work Proposals be updated by the *ad hoc* Working Group following its annual meeting to ensure that any discussion is not lost nor repeated unnecessarily at future meetings.
2. The forward workplan approach be adopted by CCFH in order to ensure that previous considerations and deliberations on proposals for new work and their prioritization are not lost.
3. The following proposed criteria be used in prioritising the forward workplan.

<b>Criteria</b>	<b>Weighting Value</b>
Public health risk* – such as a foodborne risk to public health	Actual 10
	Potential 8
Impact of trade on the public health risk	Global Impact 10
	Regional Impact 8
Currency of information: New data/technologies that influence the need to review existing code	5
Duplication of, or inconsistency with existing codes	5
More than 5 years since implementation, last review and/or last consideration by the Committee	3

\* Risk is defined in the *Codex Alimentarius Commission (CAC) Procedural Manual* as a function of the probability of an adverse health effect and the severity of that effect, consequential to a hazard in food. The hazard may be a biological, chemical or physical agent in, or condition of, food that has the potential to cause an adverse health effect.

4. The forward workplan be reviewed annually by the *ad hoc* Working Group and CCFH reaffirm priority listing.
5. Proposals for new work be progressed as per the priority allotted to them.