

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 9(a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD HYGIENE

Forty-seventh Session

Boston, Massachusetts, United States of America, 9 – 13 November 2015

COMMENTS ON NEW WORK / FORWARD WORKPLAN

(Comments of El Salvador, India, Mali and Thailand)

EL SALVADOR

El Salvador apoya que se inicien los Nuevos trabajos propuestos:

- Revisión de los Principios Generales de Higiene de los Alimentos (CAC/RCP 1-1969) y de su Anexo: Sistema de análisis de peligros y de puntos críticos de control (HACCP) - Directrices para su aplicación (Anexo sobre HACCP)

Revisión del Código de prácticas de higiene para las frutas y hortalizas y de sus anexos (CAC/RCP 53-2003).

INDIA

Considering the importance of the two proposals and their likely impact on the international trade, India proposes to prioritize the new work as follows:

First Priority: Revision of the General Principles of Food Hygiene (CAC/RCP 1-1969) and its HACCP Annex.

Second Priority: Proposal for New Work on the Revision of the "Code of Hygienic Practice for Fresh fruits And Vegetables (CAC/RCP 53-2003).

MALI

Observations d'ordre Général

Le Mali félicite les Etats-Unis d'Amérique pour la préparation du document de travail. Il n'a pas d'observations particulières et est favorable à son adoption par la 47^{ème} session du CCFH.

THAILAND

Revision of the General Principles of Food Hygiene (CAC/RCP 1-1969) and its HACCP Annex

General comment

This new work proposal to revise the General Principles of Food Hygiene (CAC/RCP 1-1969) and its HACCP Annex will largely impact users of this standard both within the Codex work and global use especially by the government and industries. This proposal needs to be considered carefully on the scope for the proposed revision.

Specific comment

3. Main aspects to be covered

Thailand is of the view that CAC/RCP 1-1969 and its HACCP Annex may be revised if the focus is on hygiene and food safety aspects. We do not agree with including managerial aspects, in particular for quality management/management system, to the scope of the revision. CAC/RCP 1-1969 and its HACCP Annex is widely used globally and referenced by a number of the other Codex Code of Hygienic Practices and Code of Practices. The expanding of the scope to encompass aspects of quality management/management system will affect the legal aspect of various countries. Also, subsequent revision of the other Codex standards which refer to CAC/RCP 1-1969 may be needed.

We do not agree with differentiating the class of control measure to control hazards for which management as CCPs presents challenges. We think that the prerequisite programme (PRP) should not be differentiated to different classes since introducing another class of control measure would lead to criteria and requirements for the specific class which will further complicate the food business operator during the HACCP application.

4.3 Scope of work and establishment of priorities between the various sections of the work

We agree with the proposed schedule for revision of different parts of the document. However, the adoption of the text should be done as a whole.

Revision of the “Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003)”

General comment

We are of the opinion that moving text from Annexes such as Fresh Leafy Vegetables, Melons and Berries, which is used to control products of higher risk than that generally specified in the Scope, completely alters the original concept and Scope of this Code. Hence, the change in Annex II of Discussion paper on the need to revise the *Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003) is substantial and not editorial. The proposed revisions need to be done by a proposal for new work

Specific comment

Section 1 Purpose and scope of the new work

We would like to amend the scope of the new work as follows:

The purpose of the proposed new work is to revise Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) ~~and delete redundancies/duplication~~ **restructure**, revise the scope and make editorial changes, add definitions and specific provisions regarding hygiene in the environment and cleaning programs.

Rationale: we do not consider repeated wordings in the Annexes of the Code as redundancies and duplication since the requirements in the Annexes are for high risk commodities. The repeated text in the Annex does not justify the appropriate use on the other low risk commodities which is covered by the Scope of the main Code.