

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 5 and 7

CRD16

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

#### Fifty-First Session

Cleveland, Ohio, United States of America, 4 - 8 November 2019

Comments by the Philippines

### PROPOSED DRAFT CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS

Comments in reply to CL 2019/69-FH (at Step 6)

#### Specific Comments:

1. Introduction, Hazard Characterization, Paragraph 9

From	To
<p>[While many different foods can cause allergic reactions in susceptible individuals, the majority of food allergies on a global basis are caused by a variety of proteins in eight foods/ food groups (and derived products). These are 1</p> <ul style="list-style-type: none"> <li>• cereals containing gluten (i.e., wheat, rye, barley, oats<sup>2</sup>, spelt or their hybridized strains and products of these)</li> <li>• crustaceans;</li> <li>• eggs;</li> <li>• fish;</li> <li>• milk;</li> <li>• peanuts;</li> <li>• soybeans; and</li> <li>• tree nuts]</li> </ul>	<p>While many different foods can cause allergic reactions in susceptible individuals, the majority of food allergies on a global basis are caused by a variety of proteins in eight foods/food groups (and derived products). These are 1</p> <ul style="list-style-type: none"> <li>• cereals containing gluten (i.e., wheat, rye, barley, oats<sup>2</sup>, <del>spelt</del> or their hybridized strains and <b>their</b> products of <del>these</del>)</li> <li>• crustaceans;</li> <li>• eggs;</li> <li>• fish;</li> <li>• milk;</li> <li>• peanuts;</li> <li>• soybeans; and</li> <li>• tree nuts]</li> </ul>

Rationale: Spelt is a type of wheat. We propose deletion to avoid redundancy.

2. Introduction, Hazard Characterization, Paragraph 13

From	To
<ul style="list-style-type: none"> <li>Allergen cross-contact can result from a number of factors in processing, preparing and handling foods, some of which pose a greater potential for cross-contact than others. The control measures implemented to prevent or minimize the likelihood of allergen cross-contact should be based on risk.</li> </ul>	<ul style="list-style-type: none"> <li>Allergen cross-contact can result from a number of factors in processing, preparing and handling foods, some of which pose a greater potential for cross-contact than others. The control measures implemented to prevent or minimize the likelihood of allergen cross-contact should be based on risk <b><u>assessment conducted by food business operators.</u></b></li> </ul>

Rationale: We propose the addition of the clause “assessment conducted by food business operators” for the reason that most of the updated food safety related standards available are now based on risk management approach / risk-based thinking.

3. Introduction, Paragraph 16, Factors contributing to exposure, For harvesting, handling, storage and transportation, bullet 4 and for packaged food manufacturing facilities, bullet 10

From	To
inadequate or lack of employee training/education on managing food allergens.	inadequate or lack of employee training/education on managing food allergens, <b><u>including lack of understanding of the serious nature of food allergies.</u></b>

Rationale: We propose inclusion of the phrase “including lack of understanding of the serious nature of food allergies” for consistency with the same bullet point under “For retail and food service establishments”.

4. Section II – Scope, Use and Definitions, paragraph 28

From	To
<b>Visibly clean</b> means having no visible food, debris and other residues. Section III – Primary Production	<b>Visibly clean</b> means having no visible food, debris and other residues. <del>Section III – Primary Production</del>

Rationale: Typographical error. This should be a ‘section heading’ before the text box on ‘Principle’ & Paragraph 29. Section heading after paragraph 29 should be deleted.

5. Section 6.1.1. Manufacturing, Paragraph 116

From	To
Equipment and preparation areas should be adequately cleaned between manufacturing foods with different allergen profiles to prevent or minimise the potential for allergen cross-contact. Cleaning procedures to remove allergen residues depend on the nature of the food residue, the equipment, the food contact surface, the nature of the cleaning (e.g. dry cleaning or wet cleaning) and the equipment, tools and materials used for cleaning. Equipment may need to be disassembled, where feasible, to adequately remove allergen residues, however some	Equipment and preparation areas should be adequately cleaned between manufacturing foods with different allergen profiles to prevent or minimise the potential for allergen cross-contact. Cleaning procedures to remove allergen residues depend on the nature of the food residue, the equipment, the food contact surface, the nature of the cleaning (e.g. dry cleaning or wet cleaning) and the equipment, tools and materials used for cleaning. Equipment may need to be disassembled, where feasible, to adequately remove allergen residues. <b><u>However if</u></b> some

equipment cannot be disassembled. This should be taken into account in the allergen management program. Dust socks need to be removed and cleaned periodically.	equipment cannot be disassembled, <del>This</del> the allergen management program should take <u>it</u> into account <del>in</del> <u>(i.e.</u> Dust socks need to be removed and cleaned periodically).
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Rationale: We propose to revise the text to provide clarity.

6. Section VII Establishment: Personal Hygiene, Paragraph 134

From	To
FBOs should encourage personnel to wash hands between handling foods that have different allergen profiles, or after having been in contact with other sources of potential allergens. Where gloves are used, consider changing regularly to reduce the likelihood of allergen cross-contact.	FBOs <del>should encourage</del> <b>shall require</b> personnel to wash hands between handling foods that have different allergen profiles, or after having been in contact with other sources of potential allergens. Where gloves are used, consider changing regularly to reduce the likelihood of allergen cross-contact.

Rationale: We propose to change the word “encourage” to “require” since handwashing is mandatory to personnel who handle food, the word “shall” is the appropriate term to be used instead of “should” which is recommendatory in nature. This is in accordance to Philippine FDA Administrative Order No. 153 s. 2004 - Revised Guidelines on current Good Manufacturing Practice in Manufacturing, Packing, or Holding Food (under Definition of Terms, item nos. 42 and 43, page 4).

**PROPOSED DRAFT GUIDANCE ON THE MANAGEMENT OF BIOLOGICAL FOODBORNE OUTBREAKS**

**General Comments:**

The Philippines support the proposed draft guidance on the management of Biological Foodborne Outbreaks. This provide guidelines on the role of competent authorities in collaboration with the food business operators and other stakeholders.

**Specific Comments:**

1. Introduction, paragraph 9

Propose to amend this paragraph to include “**whether the contaminant is known or unknown**” because this is mentioned on the FAO/WHO framework for Developing National Food Safety Emergency Response Plans (2010) as a criterion in categorization of food outbreaks.