

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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Agenda Item 8

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

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COMMENTS ON DISCUSSION PAPER ON THE REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CAC/RCP 1-1969) AND ITS HACCP ANNEX

(Comments of El Salvador, Ghana, India, Malaysia, Mali, Nigeria, Philippines, Senegal, Tanzania, Thailand and African Union)

EL SALVADOR

Observaciones generales:

El Salvador apoya que se inicie el Nuevo Trabajo de Revisión del Documento CAC/RCP 1-1969.

Se sugiere considerar lo siguiente:

1. Mantener el documento con Anexo de HACCP

Si se desea que el documento sea flexible a empresas pequeñas y medianas entiéndase que se garantizara la inocuidad de los alimentos al consumidor e integridad del producto.

GHANA

Ghana supports revision of the GPFH (CAC/RCP 1-1969) since it will provide guidance to the food industry on measures which can be used to addresses food safety challenges. The current HACCP Annex contains some terms and concepts which are not well-defined and articulated. This has resulted in such terms and concepts not being well-understood and consequently affecting the effective implementation of HACCP. We further support the development of one document covering Good Hygiene Practices (GHP) and HACCP. This will ensure that all relevant concepts, requirements, principles, steps and figures are captured in one single document. The effective implementation of HACCP depends on the establishment of GHPs or other prerequisite programmes, combining GHP and HACCP into a single document helps reemphasize this point.

Part II, point 8 of the document: Discussion of a new term for a non-CCP hazard control measure:

Comments: Ghana supports using the term “**Operational Pre-Requisite Programme (oPRP)**” instead of “non-CCP hazard control measure”.

Rationale: Many food industries are familiar with the standard ISO 22000 “Food Safety Management Systems” which already defines the term oPRP and which is a concept already implemented widely. Introducing a totally new term could create confusion and inconsistencies with existing standards.

Part II, point 9 of the document: Discussion on retaining the seven principles of HACCP:

Comments: Ghana supports the retention of the seven principles of HACCP and thus does not support the addition of new principles. The seven principles have served as a good and effective backbone of HACCP for decades and are also what everyone is familiar with as **the integral part** which constitutes the HACCP system.

Part II, point 10 of the document: Discussion on the three-part division of Principle 1 of HACCP:

Comments: Ghana supports the three-part division of Principle 1 (Hazard analysis)

Rationale: Principle 1 requires a sequential approach to identifying hazards, determining significant hazards and identifying appropriate control measures. Therefore the three sub-tasks proposed as part of Principle 1 are appropriate. To further support users in the process of identifying significant hazards, the inclusion of an appropriate matrix or set of equivalent matrices is recommended. Such matrices should use the approach of likelihood of occurrence of the hazard and severity of adverse health effects should the hazard occur, to determine significance.

Part III – Other Aspects: Terminology and Definitions: Point 15 – inclusion or exclusion of the term “condition of food” in the definition of a hazard:

Comments: Ghana supports the deletion of the term “**condition of food**” from the definition of a hazard.

Rationale: “Condition of food” is not a hazard but may lead to the incidence or increase of a hazard. Even though “condition of food” could refer to size, shape and texture of the food, in reality a hazard analysis does not take this aspect into consideration. Hazard analyses focus mainly on listing potential biological, chemical (including allergens) and physical hazards.

Part III – Other Aspects: Terminology and Definitions: Point 16 – the terms “critical” vs “essential” – whether they mean the same and should be kept or not:

Comments: Ghana supports the retention of both terms i.e. “**critical**” and “**essential**” as their meanings are different.

Part III – Other Aspects: Articulation between GPFH and other food hygiene documents:

Point 20 – the need for additional guidance on chemical and physical contaminants.

Ghana supports additional guidance on chemical and physical hazards; only to the extent of clarifying certain concepts, for example: *Step 8 of HACCP: Establish critical limits*: Criteria that are often used and cited as examples relate mainly to microbiological hazards. We suggest that additional examples are included in the revised Code to address chemical and physical hazards.

Rational: The GPFH is meant to be a general document which contains examples for clarification of concepts and therefore examples of each category of hazard should be included to improve understanding. The revised document should however not contain a list of potential chemical and physical hazards as it was not designed to be a reference document containing such a list.

Part III – Other Aspects: Articulation between GPFH and other food hygiene documents:

Points 24 and 25 – CCP Decision Trees.

Comments: Ghana supports two approaches on this issue. The first is to retain the current Codex CCP Decision Tree with the provision of more guidance to make the current Codex CCP Decision Tree easier to apply. The second approach is to allow the working group to compare and evaluate a number of alternative CCP Decision Trees for further discussion by the Committee.

Rationale: for the first approach is that the current Codex CCP Decision Tree is often misinterpreted in its use by Food Business Operators (FBOs) and therefore additional guidance would be useful. The rationale for the second approach is to provide an opportunity to review other CCP Decision Trees that may provide the additional guidance sought for the current Codex CCP Decision Tree. This review process would also provide a possibility for flexibility in implementation of the GPFH HACCP Annex at all levels of food production.

INDIA

General Comments

India would like to thank France and Thailand for development of the discussion paper. The recommendations 1 and 2, and 3 (d, e, i and j) are acceptable. Our comments/observations on the recommendations (3 a – c, g and h) are provided in the Specific Comments below.

Further, the revision should also take into account the needs of small and medium businesses and try to address the same. For example, the problem of heavy formal documentation required can be addressed by recognizing informal documentation.

Specific Comments

- I. Recommendation 3 a:** The document is 'Recommended Code of Practice General Principles of Food Hygiene (GPFH)' and should continue to be so. It should continue to provide guidance on controls for managing hygiene, including a methodology that could be adopted for focusing on enhancing food safety, and need not be converted into a management system standard. **Thus its title need not be modified.**

The concepts mentioned in the recommendation (supplier management, role of auditing etc.) are largely those of management, while GPFH are hygienic practices for ensuring suitability and safety of food. Introducing the above concept will alter the GPFH document to a management system document for managing food safety. International standards exist for managing food safety management systems. **In view of this, none of the management concepts should be in GPFH. This will ensure wider applicability of the Code including by those FBOs that do not formally go for certification but intend to apply the guidelines for food safety.**

- II. Recommendation 3 b:** GPFH may include primary production, and address the safety aspects (i) of foods that go directly to the consumer as ready-to-eat (e.g. berries, produce that will not be cooked/peeled/hulled before eating), and (ii) of final delivery to the consumer (e.g. retailers).

However, such measures should be clearly identified with the conditions under which their application is necessary. Otherwise, the guidance in the Code will become unduly stringent.

- III. Recommendation 3 c:** Product and process description, monitoring, verification, documentation and records, top management responsibility and commitment and training are horizontal between GPFH and HACCP. In view of this, some of these horizontal items can be retained both under GPFH and HACCP documents with appropriate differential emphases.

Validation in our opinion is not a horizontal between GPFH and HACCP. It is recognized that it is often not possible to validate the measures/practices applied under GPFH but they contribute to food safety.

- IV. Recommendation 3 g:** An example of 'Condition of food' with the potential to cause physical injury to the mouth of children is the sharp edges in hard boiled confectionaries which could cause injury to the mouth of the consumer (children) and needs to be addressed by the processor/manufacturer at the time of product manufacturing. There could be other examples where a piece of the product is required to be consumed as a whole requiring that such product be of appropriate size, shape and hardness etc. to enable its physically safe consumption.

'Condition of food' related hazards could also arise at the customer end, and GPFH is applicable across the food chain including the consumer for which the manufacturer would be required to provide consumer information for its safe handling.

All such cases would have to be identified for their appropriate prevention/addressing by the manufacturer during product manufacturing or via consumer information.

Therefore, we do not support removal of the phrase "condition of" from the definition of "hazard".

- V. Recommendation 3 h, 3rd bullet:** Use of clean vs. potable water should be discussed before a decision is taken to refer to the 'WHO Guidelines for Drinking Water Quality'. At present there is no such alternative standard that comes to the mind of a respondent. Nevertheless, it may not be always advisable/practical/necessary to apply the WHO standard for ensuring food safety. The WHO standard is well suited for drinking water but during manufacturing processes, several other aspects like pathogen elimination steps, suitability for use (e.g. floor cleaning, utensil cleaning) etc. need to be taken into account.

Currently, there is no clarity in the document on the conceptual differences between 'clean', 'potable' and 'other water (reclaimed etc.)' and their potential utility during various stages of product processing. Countries, however, may have some standards on some of the water types. E.g. India has standards for drinking water and for water for food processing industry developed by the Bureau of Indian Standards.

It would be appropriate to conduct discussions on this issue (conceptual clarity on the terms 'clean', 'potable' and 'other' etc. used in conjunction with water) before taking decision on how and where in the Code to make reference to 'WHO Guidelines for Drinking Water Quality'.

- VI. Recommendation to address needs of small and less developed businesses:**

The capacity/needs of small and medium businesses need to be recognized and addressed during revision of the guidelines. For example, the problem of heavy formal documentation required can be addressed by recognizing informal documentation.

This aspect is covered in the Recommendation 2 but is not reflected in the Project Document. Hence, it is proposed to indicate this in the 'Main aspects to be covered' in the Project Document as one of the aspects to be addressed.

Depending upon the final decisions of the Committee, amendments may be necessary in the proposed Project Document.

MALAYSIA

Malaysia supports the proposal for new work to revise the General Principles of Food Hygiene (CAC/RCP 1-1969) and Its HACCP Annex.

MALI

Observations d'ordre Général

Le Mali félicite le groupe de travail électronique dirigé par la France et la Thaïlande pour la révision des PGHA et leur annexe sur le système HACCP.

Le Mali estime que les PGHA et leur annexe sur le système HACCP sont des références mondiales en matière de SSA., leur révision afin de les adapter au contexte actuel, contribuerait à assurer la protection de la santé des consommateurs et améliorer le commerce international des denrées alimentaires. Le Mali n'a pas d'observations particulières sur le document de travail, et est favorable à sa progression à la prochaine étape de la procédure.

NIGERIA

Nigeria supports revision of the GPFH (CAC/RCP 1-1969) as new work, as it will provide more comprehensive guidance to the industry including small and medium businesses since its application addresses food safety challenges, enhances international trade in foods and elevates consumer protection.

Rationale: The current HACCP Annex contains some terms and concepts which are not well-defined and articulated.

Suggested title of a revised document:

Nigeria supports the recommended title to read as "**Principles and guidelines for the management of hygiene and food safety**".

Rationale: The words "**hygiene**" and "**food safety**" which are key terms, should be included in the title of the revised document.

Discussion of a new term for a non-CCP hazard control measure:

Nigeria supports using the term "**Operational Pre-Requisite Programme (OPRP)**".

Rationale: Many food industries are familiar with the standard ISO 22000 "Food Safety Management Systems" which already defines the term OPRP and which is a concept already implemented widely. To introduce a totally new term would create non-alignment with existing standards and also create confusion.

Discussion on retaining the seven principles of HACCP:

Nigeria supports the retention of the seven principles of HACCP and does not support the addition of new principles.

Rationale: The seven principles have served as a good and effective backbone of HACCP for decades and are also what everyone is familiar with as the integral part which constitutes the HACCP system.

Discussion on the three-part division of Principle 1 of HACCP:

Nigeria supports the three-part division of Principle 1.

Rationale: Principle 1 requires a sequential approach to determine significant hazards and associated control measures. Therefore the three sub-tasks proposed as part of Principle 1 are appropriate.

Part B – Recommendations, point 1:

Nigeria supports the revision of the GPFH and its Annex on HACCP (CAC/RCP 1-1969) as new work and establishment of a Working Group is supported.

Rationale: It is in line with the strategic goals of the Codex Alimentarius Commission. Revision of this document is also important to ensure that the GPFH and the Annex on HACCP provide the best available guidance based on current scientific information.

Part III – Other Aspects:

Terminology and Definitions:

Para 14 – “potable water” vs “clean water”:

Nigeria supports the suggestion to develop definitions and guidelines for “potable” and “clean water”. This discussion is similar to that occurring for the revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) and Nigeria proposes that the two discussions are aligned to ensure consistency

Nigeria also supports the development of a list of parameters for clean water that include microbiological specifications / requirements as is mentioned elsewhere in this document. The fact that the two revisions of Codes of Practice highlight the need to elaborate more text on these concepts indicates the importance of this issue.

Para 15 – inclusion or exclusion of the term “condition of food” in the definition of a hazard:

Nigeria supports the deletion of the term “**condition of food**” from the definition of a hazard.

Rationale: Condition of food is not a hazard but may lead to the incidence or increase of a hazard. Even though “condition of food” could refer to size, shape and texture of the food, in reality a hazard analysis does not take this aspect into consideration. Hazard analyses focus mainly on listing potential biological, chemical (including allergens) and physical hazards.

Para 16 – the terms “critical” vs “essential” – whether they mean the same and should be kept or not:

Nigeria supports the retention of both terms i.e. “**critical**” and “**essential**” as their meanings are different.

Articulation between GPFH and other food hygiene documents: Para 17 –

Nigeria supports the importance of keeping the revised documents as simple as possible so that small businesses and developing countries may follow the requirements with ease. In addition, the revision of the GPFH should include all relevant Codex and FAO/WHO documents as references.

Articulation between GPFH and other food hygiene documents: Para 19 –

Nigeria supports the need to clarify the distinction between validation, verification and monitoring as these concepts are not clearly delineated and are often confused.

Articulation between GPFH and other food hygiene documents Para 20 –

The need for additional guidance on chemical and physical contaminants;

Nigeria supports additional limited guidance on chemical and physical hazards; only to the extent of elucidating / clarifying certain concepts, for example: *Step 8 of HACCP: Establish critical limits*: Criteria that are often used and cited as examples relate mainly to microbiological hazards. It is suggested that additional examples are included in the revised Code to address chemical and physical hazards. The rationale for this position is that the GPFH is meant to be a general document which contains examples for clarification of concepts and therefore examples of each category of hazard should be included where any are given. The revised document should however not contain a list of potential chemical and physical hazards as it was not designed to be a reference document containing such a list.

Articulation between GPFH and other food hygiene documents: Para 21

– current text and whether it is applicable throughout the whole food chain.

Nigeria supports retaining the current HACCP text as it encompasses the entire food chain. The rationale for this support is that the current Codex text follows the mandate of the Codex Alimentarius Commission (CAC). It is therefore expected that businesses throughout the food chain, whether in primary production, processing, transportation, or distribution etc develop a HACCP plan that is appropriate to their operations using the Codex HACCP text as a guide.

Articulation between GPFH and other food hygiene documents: Para 22 and 23 – appropriateness of text for implementation by all types of enterprises and revision of GPFH and HACCP Annex.

Nigeria supports retaining the current HACCP text as it is appropriate for implementation by all types of enterprises. The issues are rather, the type of training received, the effectiveness of training and implementation of the HACCP system, none of which are within the mandate of the CAC. Additionally this document should be used in conjunction with existing FAO/WHO documents such as FAO/WHO Guidance to Governments on the Application of HACCP for Small and/or Less Developed Food Businesses. Other documents developed by governments and / or industry associations should also be used by small businesses that lack the finances or technical capacity to support them in developing an appropriate HACCP plan, based on the GPFH HACCP text as a guide.

Articulation between GPFH and other food hygiene documents: Para 24 and 25 –

CCP Decision Trees.

Nigeria supports two approaches on this issue.

The first is to retain the current Codex CCP Decision Tree with the provision of more guidance to make the current Codex CCP Decision Tree easier to apply.

The second approach is to allow the working group to compare and evaluate a number of alternative CCP Decision Trees for further discussion by the committee.

Rationale

For the first approach is that the current Codex CCP Decision Tree is often misinterpreted in its use by Food Business Operators (FBOs) and therefore additional guidance would be useful.

The second approach is to provide an opportunity to review other CCP Decision Trees that may provide the additional guidance sought for the current Codex CCP Decision Tree. This review process would also provide a possibility for flexibility in implementation of the GPFH HACCP Annex at all levels of food production.

PHILIPPINES

General Comments:

The Philippines would like to provide general comments on the list of issues posed by the EWG in pages 5 to 6:

1. The Committee should consider starting new work on the revision of the General Principles of Food Hygiene and its Annex: Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application (CAC/RCP 1-1969) , with an introduction and two distinct parts (General Principles of Food Hygiene and an annex on HACCP) and seven HACCP principles (Project Document attached as Annex) and, if agreed, establishing a Working Group to that effect;

We support the proposed new work to revise the General Principles of Food Hygiene and its Annex with the proposed structure of GPH (to cover safety and suitability) and HACCP (to cover food safety). We also support establishment of the Working Group to work on the proposed revision, with its Terms of Reference.

2. To recommend the WG to keep in mind that the revised text should be useful to all types of stakeholders. Therefore, it should be as simple as possible and provide more flexibility to small and medium enterprises, or to businesses developing innovative food processes, in order to achieve wider application while maintaining consumer safety;

We support that the revised text be useful to all relevant stakeholders (food business operators and competent authorities, more particularly). The text should be applicable even to small and medium enterprise, which comprise most of the Philippine food business operators.

3. To consider:

- a. Whether the document is aimed at dealing with managerial aspects, thereby instructing Food Business Operators (FBOs) on how to manage their quality and safety system, and if the title should be modified accordingly. If so, it could be necessary to determine how FBOs should address concepts such as supplier management, the role of auditing, contract manufacturing, storage procedures and processes, change management, continuous improvement, Good Agricultural Practices;

We propose to confine the document to the essential principles of food hygiene and its requirements, considering the scope of the current title and its applicability. Food safety management system covers other broad range of concepts that may not be relevant to all stakeholders, and may be addressed in another document.

- b. Whether the GPFH include primary production, and address the safety aspects (i) of foods that go directly to the consumer as ready-to-eat (e.g. berries, produce that will not be cooked/peeled/hulled before eating), and (ii) of final delivery to the consumer (e.g. retailers);

We propose that the revised text cover hygiene requirements from primary production to consumption, consistent with the farm to fork approach in controlling hazards.

- c. As a number of items are common to both parts of the document (such as but not limited to product and process description, validation, monitoring, verification), deciding whether these items are to be presented first in the introduction and then developed in both GPFH and HACCP while emphasizing that their application could be more rigorous in the HACCP context than in the GPFH one;

We propose to discuss common concepts in the introduction first and then discuss its corresponding application in the two separate sections on GPFH and HACCP.

- d. Whether revising the definition section in the introduction. Especially, clear definitions for the following terms could be added: “good hygiene practice”, “prerequisite programs”, “potable water”, and “clean water”. Additionally, in relation to HACCP, clarifying the use of “essential” and “critical” in relation to HACCP since many do not consider these to be equivalent but the terms appear to be so according to the CCP definition;

We support the revision of the current definition section to cover additional terms and address ambiguities of terms.

- e. Whether elaborating a sequential systematic approach to be implemented for hazard identification and analysis in order to allow for (i) establishing a preliminary list of potential hazards independently of consideration of GHP implementation, and (ii) determining a shorter list of significant hazards to be addressed in the HACCP plan that takes into account the GHP measures implemented;

We support the elaboration of a sequential systematic approach on hazard identification and analysis in order to link the potential hazards already addressed by the implementation of GHP measures and the list of significant hazards addressed in the HACCP Plan.

- f. As regards hazard control measures, taking into account that the definition of the CCP will remain unchanged, examining the need for a class of control measures essential to control hazards for which management as CCPs presents challenges;

We support to retain the current definition of a CCP and control measures, since they are still applicable. A class of control measures may be considered only if distinctions are well defined, clear and acceptable.

- g. Whether removing the expression “condition of” in the definition of the term Hazard or including an explanation in the definition, providing another term while addressing where appropriate choking hazards and foods associated with illness but in which the hazardous substance cannot be identified;

We support the retention of the current definition of hazard with the phrase “condition of” as this is an internationally accepted definition, with an explicit explanation in which “condition of food” can cause potential risk to health i.e., size, shape, and texture leading to choking.

- h. Including references to:

- “Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CAC/GL 21-1997)” to provide more guidance on Micro-biological Criteria;
- “Guidelines for the Validation of Food Safety Control Measures (CAC/GL69-2008)” to provide more guidance on validation;
- “WHO Guidelines for Drinking Water Quality” on the use of water, and the “Code of practice for fish and fishery products” (CAC/RCP 52-2003) on the use of clean vs. potable water”;

We propose to include references that are applicable to everyone, including the small and medium enterprises. This is consistent with the overall intention of a revised document.

- i. Addressing the distinction between validation and verification, for instance by amending the contents of Step 8 (Principle 3) and Step 11 (Principle 6) in order to clarify validation related to those steps;

We support further clarification on the distinction between validation and verification and the consequential amendments to the contents of Step 8 (Establishing Critical Limits) and Step 11 (Establishing Verification Procedures).

- j. Elaborating further guidance on:

- The control of chemical contaminants, including allergens and mycotoxins;

We propose that the revised document address control of all hazards, in general, as this is considered a general document covering the controls of all types of hazards.

- How to use the current decision tree; and, if appropriate, adding decision trees related to chemical or physical hazards;

We propose to retain the current decision tree, since it is still considered to be generally useful and applicable.

- The establishment of science based critical limits for CCPs and their proper use.

We will support the establishment of science-based critical limits for CCPs as this will be useful to the food business operators in developing their HACCP plans.

SENEGAL

Le Sénégal soutient la révision de la PGHA (CAC / RCP 1-1969) comme nouveau travail car il fournira des orientations plus complètes à l'industrie, y compris les petites et moyennes entreprises face à ses défis en matière de sécurité des aliments, stimulera le commerce international dans les aliments et augmentera la protection des consommateurs. La révision du PGHA et de l'annexe HACCP contient certains termes et concepts qui ne sont pas bien définis et articulés. Aussi ces termes et concepts peuvent ne pas être bien compris et par conséquent pas bien appliquée. Il ya aussi quelques lacunes dans l'Annexe HACCP actuelle qui doivent être corrigées afin d'aider les utilisateurs du document ultérieurement. Le développement **d'un seul** document relatif aux bonnes pratiques d'hygiène (BPH) et HACCP en deux parties est également soutenu afin que tous les concepts pertinents, les exigences, les principes, les étapes et les figures soient inscrits dans un document unique, ce qui rend le document convivial et permet d'insister sur l'importance des BPH comme un programme pré-requis pour HACCP.

2.1 Titre suggéré du document révisé:

Position: Le Sénégal soutient le titre "Principes et lignes directrices pour la gestion de l'hygiène et la sécurité des aliments" suggérées comme indiqué dans la Partie I, point 5 du document. La justification de cette suggestion est que les mots «hygiène» et «sécurité des aliments», qui sont des termes clés, devraient être inclus dans le titre du document révisé.

2.2 Discussion d'un nouveau terme pour une mesure de contrôle de danger qui n'est pas un CCP:

Position: En ce qui concerne la discussion sur un terme pour une mesure de contrôle de dangers n'étant pas de CCP discuté dans la partie II, point 8 du document, le Sénégal supporte l'utilisation du terme "Programme Préalable opérationnel (PRPo)". La justification de cette suggestion est que de nombreuses industries alimentaires sont familiers avec la norme ISO 22000 «Systèmes de management de la sécurité des aliments» qui définit déjà PRPo terme et qui est un concept déjà largement mis en oeuvre. Introduire un tout nouveau terme créerait un non-alignement sur les normes existantes et également pourrait entraîner la confusion.

2.3 Discussion sur le maintien des sept principes du système HACCP:

Position: Le Sénégal soutient le maintien des sept principes du HACCP tel que discuté dans la partie II, point 9 du document et donc ne supporte pas l'ajout de nouveaux principes. Les sept principes ont servi comme une bonne et efficace épine dorsale de HACCP depuis des décennies et sont aussi compris par tout le monde comme partie intégrante constituant le système HACCP.

2.4 Discussion sur la division en trois parties du Principe 1 du système HACCP:

Position: Le Sénégal soutient la division en trois parties du principe 1 comme indiqué et discuté dans la partie II, point 10 du document. La justification de cette suggestion est que le Principe 1 nécessite une approche séquentielle pour déterminer les dangers importants et les mesures de contrôle associées. Par conséquent, les trois sous-tâches proposées dans le cadre du principe 1 sont appropriées. Pour aider à une meilleure identification des dangers significatifs, l'inclusion d'une matrice appropriée ou d'un ensemble de matrices équivalentes est recommandée. Ces matrices doivent utiliser l'approche de la probabilité de survenue du danger et la gravité des effets néfastes sur la santé dus à ce danger, pour déterminer leur importance.

2.5 Partie B - Recommandations, point 1:

Position: Le Sénégal soutient la révision du PGHA GBFH et son annexe sur le système HACCP (CAC / RCP 1-1969) comme nouveau travail. La justification de cette proposition est que ça concorde avec les objectifs stratégiques de la Commission du Codex Alimentarius. Une révision de ce document est également importante car le PGHA et l'annexe sur l'HACCP vont fournir de meilleures orientations disponibles basées sur des informations scientifiques actuelles. En outre, nous supportons aussi la création d'un Groupe de travail.

2.6 Partie III - Autres aspects: Terminologie et définitions: Paragraphe 14 - «eau potable» vs «eau propre»:

Position: Le Sénégal soutient la proposition visant à élaborer des définitions et des lignes directrices pour «potable» et «eau propre». Cette discussion est similaire à celle qui se produit pour la révision du Code d'usages pour les fruits et légumes (CAC / RCP 53-2003) et le Sénégal propose que les deux discussions soient mise en commun pour assurer la cohérence. Le Sénégal soutient le développement d'une liste de paramètres pour l'eau propre qui comprennent des spécifications / exigences microbiologiques comme il est mentionné ailleurs dans ce document. Le fait que les deux révisions des codes de pratiques mettent en évidence la nécessité d'élaborer plus de texte sur ces concepts indique l'importance de cette question.

2.7 Partie III - Autres aspects: terminologie et les définitions: Paragraphe 15 - inclusion ou l'exclusion de l'expression «état de denrées alimentaires» dans la définition d'un danger:

Position: Le Sénégal soutient la suppression du terme "état de denrées alimentaires" de la définition d'un danger. La justification de cette suggestion est que la condition de la nourriture est pas un danger, mais peut conduire à l'incidence ou l'augmentation d'un danger. Même si "état des denrées alimentaires" pourrait se référer à la taille, la forme et la texture de la nourriture, en réalité, une analyse des risques ne prend pas en compte cet aspect. Analyse des risques se concentrent principalement sur la liste potentielle des dangers biologiques, chimiques (y compris les allergènes) et.

2.8 Partie III - Autres aspects: Terminologie et définitions: Paragraphe 16 - les termes «critique» vs «essentiel» - si elles signifient la même chose et doivent être conservés ou non:

Position: Le Sénégal appuie le maintien des deux termes c'est-à-dire «critique» et «essentiel» en considérant que leurs significations sont différentes.

2.9 Partie III - Autres aspects: Articulation entre PGHA et d'autres documents d'hygiène alimentaire: le point 17:

Position: Le Sénégal soutient la nécessité de maintenir le document révisé sous une forme simplifiée afin que les petites entreprises et les pays en développement puissent suivre les exigences avec facilité. En outre, la révision du PGHA devrait inclure tous les documents du Codex et de la FAO / OMS pertinents comme références.

2.10 Partie III - Autres aspects: Articulation entre PGHA et d'autres documents d'hygiène alimentaire: le point 19:

Position: Le Sénégal soutient la nécessité de clarifier la distinction entre la validation, la vérification et la surveillance de ces concepts car ils ne sont pas clairement délimitées et sont souvent confondus. Fournir des conseils sur l'établissement des limites critiques en utilisant des outils scientifiques et applicables et, ce faisant, aider à clarifier le concept de validation sont également supportés par le Sénégal, car les orientations et les outils seraient d'une grande utilité pour les petites entreprises et les pays en développement.

2.11 Partie III - Autres aspects: Articulation entre PGHA et d'autres documents d'hygiène alimentaire: Paragraphe 20 - la nécessité d'orientations supplémentaires sur les contaminants chimiques et physiques.

Position: Le Sénégal soutient les directives supplémentaires relatives aux dangers chimiques et physiques; seulement en vue d'élucider / clarifier certains concepts, par exemple: l'étape 8 de HACCP: établir des limites critiques: Critères qui sont souvent utilisés et cités comme exemples portent principalement sur les dangers microbiologiques. Il est suggéré que des exemples supplémentaires soient inclus dans le Code révisé pour éliminer les dangers chimiques et physiques. La justification de cette position est que le PGHA est censé être un document général qui contient des exemples de clarification des concepts et donc des exemples de chaque catégorie de dangers devraient être inclus là où c'est mentionné. Le document révisé devrait cependant contenir une liste des dangers chimiques et physiques potentiels car il n'a pas été conçu pour être un document de référence contenant une telle liste.

2.12 Partie III - Autres aspects: Articulation entre PGHA et d'autres documents d'hygiène alimentaire: le point 21 - texte actuel et si elle est applicable dans toute la chaîne alimentaire.

Position: Le Sénégal soutient le maintien du texte actuel HACCP car il englobe la chaîne alimentaire. La justification de ce soutien est que le texte actuel du Codex suit le mandat de la Commission du Codex Alimentarius (CAC). Il est donc prévu que les entreprises tout au long de la chaîne alimentaire, que ce soit dans la production primaire, la transformation, le transport ou la distribution etc élaborent un plan HACCP qui est approprié à leurs opérations en utilisant le texte HACCP du Codex comme un guide.

2.13 Partie III - Autres aspects: Articulation entre PGHA et d'autres documents d'hygiène alimentaire: Points 22 et 23 - pertinence de texte pour la mise en œuvre par tous les types d'entreprises et la révision de l'annexe PGHA et HACCP.

Position: Le Sénégal soutient le maintien du texte actuel HACCP comme il est approprié pour sa mise en œuvre par tous les types d'entreprises. Les questions sont plutôt que le type de formation reçue, l'efficacité de la formation et de la mise en œuvre du système HACCP ne relèvent pas du mandat de la CAC. En outre, ce document devrait être utilisé conjointement avec les documents de la FAO / OMS existants tels que la FAO / OMS aux gouvernements sur l'application du système HACCP pour les petites et / ou les entreprises alimentaires moins développées. Les autres documents élaborés par les gouvernements et / ou les associations de l'industrie devraient également être utilisés par les petites entreprises qui ne disposent pas des finances ou des capacités techniques pour les aider dans l'élaboration d'un plan HACCP approprié, fondé sur le texte PGHA HACCP comme guide.

2.14 Partie III - Autres aspects: Articulation entre PGHA et d'autres documents d'hygiène alimentaire: Points 24 et 25 - Décision du PCC arbres.

Position: Le Sénégal soutient deux approches sur cette question. Le premier est de conserver l'arbre courant de la décision du Codex PCC avec la fourniture de plus de conseils pour rendre l'arbre courant de la décision PCC Codex plus facile à appliquer. La seconde approche est de permettre au groupe de travail pour comparer et évaluer un certain nombre d'alternatives décision PCC arbres pour poursuivre la discussion par le comité. La justification de la première approche est que l'arbre courant de la décision PCC Codex est souvent mal interprété dans son utilisation par les exploitants du secteur alimentaire (gVirt_NP_NNS_NNPS<FBO) et donc des orientations supplémentaires seraient utiles. La justification de la seconde approche est de fournir l'occasion d'examiner une autre décision du PCC arbres qui peuvent fournir des directives supplémentaires recherchée pour l'Arbre de décision actuelle PCC Codex. Ce processus d'examen devrait également prévoir la possibilité pour la flexibilité dans la mise en œuvre de l'annexe PGHA HACCP à tous les niveaux de production alimentaire

TANZANIA

Tanzania Position: Tanzania supports revision of the GPFH (CAC/RCP 1-1969) as new work as it will provide more comprehensive guidance to the industry including small and medium businesses since its application addresses food safety challenges, enhances international trade in foods and elevates consumer protection. The current HACCP Annex contains some terms and concepts which are not well-defined and articulated. This has resulted in such terms and concepts not being well-understood and consequently not well applied. There are also some gaps in the current HACCP Annex which should be filled in order to assist users of the document further. The development of **one document** covering Good Hygiene Practices (GHP) and HACCP as **two parts** is also supported so that all relevant concepts, requirements, principles, steps and figures are captured in one single document, making the document user-friendly and also emphasizing the importance of GHP as a pre-requisite programme for HACCP.

2.1 Suggested title of a revised document:

Tanzania Position: Tanzania supports the suggested title “Principles and guidelines for the management of hygiene and food safety” as discussed in Part I, point 5 of the document. The reason for this suggestion is that the words “**hygiene**” and “**food safety**” which are key terms should be included in the title of the revised document.

2.2 Discussion of a new term for a non-CCP hazard control measure discussed in Part II, point 8 of the document:

Tanzania Position: Tanzania supports using the term “**Operational Pre-Requisite Programme (OPRP)**”. The reason for this suggestion is that many food industries are familiar with the standard ISO 22000 “Food Safety Management Systems” which already defines the term OPRP and which is a concept already implemented widely. To introduce a totally new term would create non-alignment with existing standards and also create confusion.

2.3 Discussion on retaining the seven principles of HACCP:

Tanzania Position: Tanzania supports the retention of the seven principles of HACCP as discussed in Part II, point 9 of the document and thus does not support the addition of new principles. The seven principles have served as a good and effective backbone of HACCP for decades and are also what everyone is familiar with as the integral part which constitutes the HACCP system.

2.4 Discussion on the three-part division of Principle 1 of HACCP:

Tanzania Position: Tanzania supports the three-part division of Principle 1 as indicated and discussed in Part II, point 10 of the document. The reason for this suggestion is that Principle 1 requires a sequential approach to determine significant hazards and associated control measures. Therefore the three sub-tasks proposed as part of Principle 1 are appropriate. To further support users in the process of identifying significant hazards, the inclusion of an appropriate matrix or set of equivalent matrices is recommended. Such matrices should use the approach of likelihood of occurrence of the hazard and severity of adverse health effects should the hazard occur, to determine significance.

2.5 Part B – Recommendations, point 1:

Tanzania Position: Tanzania supports the revision of the GPFH and its Annex on HACCP (CAC/RCP 1-1969) as new work. The reason for this suggestion is in line with the strategic goals of the Codex Alimentarius Commission. A revision of this document is also important to ensure that the GPFH and the Annex on HACCP provide the best available guidance based on current scientific information. In addition, the establishment of a Working Group is supported.

2.6 Part III – Other Aspects: Terminology and Definitions: Point 14 – “potable water” vs “clean water”:

Tanzania Position: Tanzania supports the suggestion to develop definitions and guidelines for “potable” and “clean water”. This discussion is similar to that occurring for the revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) and Tanzania proposes that the two discussions are aligned to ensure consistency. Also Tanzania supports the development of a list of parameters for clean water that include microbiological specifications / requirements as is mentioned elsewhere in this document. The fact that the two revisions of Codes of Practice highlight the need to elaborate more text on these concepts indicates the importance of this issue.

2.7 Part III – Other Aspects: Terminology and Definitions: Point 15 – inclusion or exclusion of the term “condition of food” in the definition of a hazard:

Tanzania Position: Tanzania supports the deletion of the term “**condition of food**” from the definition of a hazard. The reason for this suggestion is that the condition of food is not a hazard but may lead to the incidence or increase of a hazard. Even though “condition of food” could refer to size, shape and texture of the food, in reality a hazard analysis does not take this aspect into consideration. Hazard analyses focus mainly on listing potential biological, chemical (including allergens) and physical hazards.

2.8 Part III – Other Aspects: Terminology and Definitions: Point 16 – the terms “critical” vs “essential” – whether they mean the same and should be kept or not:

Tanzania Position: Tanzania supports retention of both terms i.e. “**critical**” and “**essential**” as their meanings are different.

2.9 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 17:

Tanzania Position: Tanzania supports the importance of keeping the revised documents as simple as possible so that small businesses and developing countries may follow the requirements with ease. In addition, the revision of the GPFH should include all relevant Codex and FAO/WHO documents as references.

2.10 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 19:

Tanzania Position: Tanzania supports the need to clarify the distinction between validation, verification and monitoring as these concepts are not clearly delineated and are often confused. Providing guidance on establishing critical limits using science-based and applicable tools and in so doing, assisting to clarify the concept of validation is also supported, as this guidance and tools would be extremely useful to small businesses and developing countries.

2.11 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 20 – the need for additional guidance on chemical and physical contaminants.

Tanzania Position: Tanzania supports additional limited guidance on chemical and physical hazards; only to the extent of elucidating / clarifying certain concepts, for example: *Step 8 of HACCP: Establish critical limits:* Criteria that are often used and cited as examples relate mainly to microbiological hazards. It is suggested that additional examples are included in the revised Code to address chemical and physical hazards. The reason for this position is that the GPFH is meant to be a general document which contains examples for clarification of concepts and therefore, examples of each category of hazard should be included where any are given. The revised document should however not contain a list of potential chemical and physical hazards as it was not designed to be a reference document containing such a list.

2.12 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 21 – current HACCP text and whether it is applicable throughout the whole food chain.

Tanzania Position: Tanzania supports retention of the current HACCP text as it encompasses the entire food chain. The reason for this support is that the current Codex text follows the mandate of the Codex Alimentarius Commission (CAC). It is therefore, expected that businesses throughout the food chain, whether in primary production, processing, transportation or distribution etc. develop a HACCP plan that is appropriate to their operations using the Codex HACCP text as a guide.

2.13 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Points 22 and 23 – appropriateness of text for implementation by all types of enterprises and revision of GPFH and HACCP Annex.

Tanzania Position: Tanzania supports retention of the current HACCP text as it is appropriate for implementation by all types of enterprises. The issues are rather, the type of training received, the effectiveness of training and implementation of the HACCP system, none of which are within the mandate of the CAC. Additionally this document should be used in conjunction with existing FAO/WHO documents such as FAO/WHO Guidance to Governments on the Application of HACCP for Small and/or Less Developed Food Businesses. Other documents developed by governments and / or industry associations should also be used by small businesses that lack the finances or technical capacity to support them in developing an appropriate HACCP plan, based on the GPFH HACCP text as a guide.

2.14 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Points 24 and 25 – CCP Decision Trees.

Tanzania Position: Tanzania supports two approaches on this issue. The first is to retain the current Codex CCP Decision Tree with the provision of more guidance to make the current Codex CCP Decision Tree easier to apply. The reason for this support is that the current Codex CCP Decision Tree is often misinterpreted in its use by Food Business Operators (FBOs) and therefore, additional guidance would be useful.

The second approach is to allow the working group to compare and evaluate a number of alternative CCP Decision Trees for further discussion by the committee. The reason for this the second approach is to provide an opportunity to review other CCP Decision Trees that may provide the additional guidance sought for the current Codex CCP Decision Tree. This review process would also provide a possibility for flexibility in implementation of the GPFH HACCP Annex at all levels of food production.

THAILAND

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 by the government and industries. This proposal needs to be considered carefully on the scope and need for the proposed revision.

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 documents which refer to CAC/RCP 1-1969 may be needed.

Some hygiene-related management concepts such as supplier management, contract manufacturing, storage procedures and processes currently exist in the current CAC/RCP 1-1969. The revision may help update and bring more attention to these concepts. However, the concepts such as change management and continuous improvement are beyond the concept of hygiene and food safety which is primarily the term of reference of the CCFH.

Sequential systematic approach is a useful approach for HACCP Principle 1: Hazard analysis and should be employed by the food business operator while identifying hazards during the application of HACCP. However, it might not be necessary to require the industries to conduct and keep written evidence for both subtasks of 1) establishing a preliminary list and 2) determining a shorter list.

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 classes which will further complicate the food business operator during the HACCP application.

African Union

The AU supports revision of the GPFH (CAC/RCP 1-1969) as new work as it will provide more comprehensive guidance to the industry including small and medium businesses since its application addresses food safety challenges, enhances international trade in foods and elevates consumer protection. The current HACCP Annex contains some terms and concepts which are not well-defined and articulated. This has resulted in such terms and concepts not being well-understood and consequently not well applied. There are also some gaps in the current HACCP Annex which should be filled in order to assist users of the document further. The development of **one document** covering Good Hygiene Practices (GHP) and HACCP as **two parts** is also supported so that all relevant concepts, requirements, principles, steps and figures are captured in one single document, making the document user-friendly and also emphasizing the importance of GHP as a pre-requisite programme for HACCP.

2.1 Suggested title of a revised document:

A.U. Position: The AU supports the suggested title “Principles and guidelines for the management of hygiene and food safety” as discussed in Part I, point 5 of the document. The rationale for this suggestion is that the words “**hygiene**” and “**food safety**” which are key terms, should be included in the title of the revised document.

2.2 Discussion of a new term for a non-CCP hazard control measure:

A.U. Position: Regarding the discussion on a term for a non-CCP hazard control measure discussed in Part II, point 8 of the document, the AU supports using the term “**Operational Pre-Requisite Programme (OPRP)**”. The rationale for this suggestion is that many food industries are familiar with the standard ISO 22000 “Food Safety Management Systems” which already defines the term OPRP and which is a concept already implemented widely. To introduce a totally new term would create non-alignment with existing standards and also create confusion.

2.3 Discussion on retaining the seven principles of HACCP:

A.U. Position: The AU supports the retention of the seven principles of HACCP as discussed in Part II, point 9 of the document and thus does not support the addition of new principles. The seven principles have served as a good and effective backbone of HACCP for decades and are also what everyone is familiar with as **the integral part** which constitutes the HACCP system.

2.4 Discussion on the three-part division of Principle 1 of HACCP:

A.U. Position: The AU supports the three-part division of Principle 1 as indicated and discussed in Part II, point 10 of the document. The rationale for this suggestion is that Principle 1 requires a sequential approach to determine significant hazards and associated control measures. Therefore the three sub-tasks proposed as part of Principle 1 are appropriate. To further support users in the process of identifying significant hazards, the inclusion of an appropriate matrix or set of equivalent matrices is recommended. Such matrices should use the approach of likelihood of occurrence of the hazard and severity of adverse health effects should the hazard occur, to determine significance.

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A.U. Position: The AU supports the revision of the GPFH and its Annex on HACCP (CAC/RCP 1-1969) as new work. The rationale for this suggestion is in line with the strategic goals of the Codex Alimentarius Commission. A revision of this document is also important to ensure that the GPFH and the Annex on HACCP provide the best available guidance based on current scientific information. In addition, the establishment of a Working Group is supported.

2.6 Part III – Other Aspects: Terminology and Definitions: Point 14 – “potable water” vs “clean water”:

A.U. Position: The AU supports the suggestion to develop definitions and guidelines for “potable” and “clean water”. This discussion is similar to that occurring for the revision of the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) and the AU proposes that the two discussions are aligned to ensure consistency. The AU supports the development of a list of parameters for clean water that include microbiological specifications / requirements as is mentioned elsewhere in this document. The fact that the two revisions of Codes of Practice highlight the need to elaborate more text on these concepts indicates the importance of this issue.

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A.U. Position: The AU supports the deletion of the term “**condition of food**” from the definition of a hazard. The rationale for this suggestion is that the condition of food is not a hazard but may lead to the incidence or increase of a hazard. Even though “condition of food” could refer to size, shape and texture of the food, in reality a hazard analysis does not take this aspect into consideration. Hazard analyses focus mainly on listing potential biological, chemical (including allergens) and physical hazards.

2.8 Part III – Other Aspects: Terminology and Definitions: Point 16 – the terms “critical” vs “essential” – whether they mean the same and should be kept or not:

A.U. Position: The AU supports the retention of both terms i.e. “**critical**” and “**essential**” as their meanings are different.

2.9 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 17:

A.U. Position: The AU supports the importance of keeping the revised documents as simple as possible so that small businesses and developing countries may follow the requirements with ease. In addition, the revision of the GPFH should include all relevant Codex and FAO/WHO documents as references.

2.10 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 19:

A.U. Position: The AU supports the need to clarify the distinction between validation, verification and monitoring as these concepts are not clearly delineated and are often confused. Providing guidance on establishing critical limits using science-based and applicable tools and in so doing, assisting to clarify the concept of validation is also supported, as this guidance and tools would be extremely useful to small businesses and developing countries.

2.11 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 20 – the need for additional guidance on chemical and physical contaminants.

A.U. Position: The AU supports additional limited guidance on chemical and physical hazards; only to the extent of elucidating / clarifying certain concepts, for example: *Step 8 of HACCP: Establish critical limits*: Criteria that are often used and cited as examples relate mainly to microbiological hazards. It is suggested that additional examples are included in the revised Code to address chemical and physical hazards. The rationale for this position is that the GPFH is meant to be a general document which contains examples for clarification of concepts and therefore examples of each category of hazard should be included where any are given. The revised document should however not contain a list of potential chemical and physical hazards as it was not designed to be a reference document containing such a list.

2.12 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Point 21 – current text and whether it is applicable throughout the whole food chain.

A.U. Position: The AU supports retaining the current HACCP text as it encompasses the entire food chain. The rationale for this support is that the current Codex text follows the mandate of the Codex Alimentarius Commission (CAC). It is therefore expected that businesses throughout the food chain, whether in primary production, processing, transportation, or distribution etc develop a HACCP plan that is appropriate to their operations using the Codex HACCP text as a guide.

2.13 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Points 22 and 23 – appropriateness of text for implementation by all types of enterprises and revision of GPFH and HACCP Annex.

A.U. Position: The AU supports retaining the current HACCP text as it is appropriate for implementation by all types of enterprises. The issues are rather, the type of training received, the effectiveness of training and implementation of the HACCP system, none of which are within the mandate of the CAC. Additionally this document should be used in conjunction with existing FAO/WHO documents such as FAO/WHO Guidance to Governments on the Application of HACCP for Small and/or Less Developed Food Businesses. Other documents developed by governments and / or industry associations should also be used by small businesses that lack the finances or technical capacity to support them in developing an appropriate HACCP plan, based on the GPFH HACCP text as a guide.

2.14 Part III – Other Aspects: Articulation between GPFH and other food hygiene documents: Points 24 and 25 – CCP Decision Trees.

A.U. Position: The AU supports two approaches on this issue. The first is to retain the current Codex CCP Decision Tree with the provision of more guidance to make the current Codex CCP Decision Tree easier to apply. The second approach is to allow the working group to compare and evaluate a number of alternative CCP Decision Trees for further discussion by the committee. The rationale for the first approach is that the current Codex CCP Decision Tree is often misinterpreted in its use by Food Business Operators (FBOs) and therefore additional guidance would be useful. The rationale for the second approach is to provide an opportunity to review other CCP Decision Trees that may provide the additional guidance sought for the current Codex CCP Decision Tree. This review process would also provide a possibility for flexibility in implementation of the GPFH HACCP Annex at all levels of food production.