CODEX ALIMENTARIUS COMMISSION

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World Health Organization

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Agenda item 5 **CX/FH 18/50/5-Add.1**

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

Fiftieth Session

Panama City, Panama, 12 - 16 November 2018

PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CXC 1-1969) AND ITS HACCP ANNEX
Replies to comments at Step 3 to CL 2018/69-FH

Comments of Argentina, Brazil, Chile, Canada, Colombia, Costa Rica, Cuba, Ecuador, Egypt, Gambia, Guyana, India, Iraq, Jamaica, Japan, Kenya, Mauritius, Morocco, Norway, Nicaragua, Panama, Peru, Philippines, Senegal, Switzerland, Thailand, the United States of America, Uruguay, African Union, FoodDrinkEurope, International Dairy Federation and Safe Supply of Affordable Food Everywhere

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2018/69-FH issued in August 2018. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

ANNEX I

GENERAL COMMENT	MEMBER/OBSERVER
For a complete understanding of the document it is necessary to define the term "review of hazards". What does this term literally mean? Does the "review of hazards" contemplate, in principle 1, the performance of the hazard analysis based on external references? It is? If there is no CCP determination, the other principles of the HACCP system need not be followed, if there is CCP identification, all HACCP principles should be applied in their entirety. **Q1**: There has been mixed views about this table –views are requested on whether it is useful or whether it should be deleted. Brazil agrees that the table be useful. **Q2:** Are there any FAO/WHO programmes which can be referenced here? No comments. **Q3**: Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here? Brazil agrees with the section change. **Q4**: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food? No, this is unnecessary. **Q5**: Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be used within the text. Replace sanitation with "cleaning" and "disinfection" and adjust the other COHPs. **Q6** Validation has been added to Principle 6 on verification because the application text for Principle 6 included a statement on validation. However, it may be more appropriate to include 'Validation' under Principle 3. What do members think? The Definitions which were here have been moved to an earlier section. Brazil prefers that Validation be outside of any principle, since it does not apply only in the establishment of the critical limits and verification steps. Validation involves the entire HACCP system.	**Brazil**
Canada agrees with the proposal to highlight that some GHPs may warrant additional attention, instead of creating and naming a new category of control measures (which has proven to be more challenging than anticipated). Canada noted that a few periods were missing in the document. There were also a few typographical errors. Headings are no longer numbered, which makes it difficult at times to understand the flow of the text. For example in section I, there are two sections titled "equipment", one in small font and one in all caps. It will be important to re-number the sub-sections before finalizing the text as other codes of practice follow the same structure and skip some subsections to prevent duplication with the general code.	**Canada**
Cuba appreciates the opportunity to submit the following comments on the document: - Cuba supports the Working Group's recommendations and finds the document prepared by the Electronic Working Group to be very good. This EWG was chaired by the United Kingdom and co-chaired by the United States, France, Ghana, India, and Mexico. - As regards **Question 1**, Cuba agrees that this table could be useful, as it correctly establishes the GHP specifications as applied to food safety and suitability and HACCP control measures as applied to improving food safety. - Cuba feels that it is very important for the leadership's commitment to be explicitly noted. - The terms should provide a brief description of the hazard review appearing bracketed as a question. - As regards **Question 2**, we have had no access to any FAO/WHO program on Hygienic Production of Food Sources; we believe that the content described in the document is very useful for controlling this type of production. - As regards **Question 3**, regarding moving the original text of CXC 1–1969 to the section on water, we find thid proposal to be appropriate. - As regards **Question 4**, a paragraph is needed to discuss monitoring of temperature of premises, equipment and food.	**Cuba**

- Cuba supports the content of the note under water. - As regards **Question 5**, Cuba finds the word 'sanitation' to be the most complete; it should be defined in the document. - As regards **Question 6**, Cuba agrees with adding validation to Principle 6 on verification. However, a short text could be added on validation at Principle 3, given the importance of validating control limits. - As regards **Question 7** on the decision tree at Diagram 2, provided by Brazil and amended by the UK, we find it to be very complex in terms of ease of stakeholder understanding; the first box underneath the 'yes' on higher GHP control levels is somewhat ambiguous. - As regards **Question 8**, Cuba supports titling this section as it appears in the document, as well as the inclusion of the additional text.	
(i) General Comments: Ecuador appreciates the work of the Electronic Working Group and is considering supporting the document, taking the following comments into account: (ii) Specific Comments: - Ecuador proposes including the following text in paragraph 14: Food business operators should apply good hygiene practices (GHP) and the food safety principles set out in this document (…). - Ecuador suggests changing the following in numeral (v) on General Principles: Depending on the nature of the food business and potential related risks, the GHPs and CCPs control hazards. - Under Definitions, we recommend including the definition of "Good Hygiene Practices (GHP)" and "Hazard Review." - In the chapter on Good Hygiene Practices, paragraph 20, we suggest replacing the Spanish term "emplazamiento" with "location," to enhance understanding. [Change does not apply to the English text] - In the section on Environmental Hygiene, Ecuador suggests including the following text in paragraph 26: Potential sources of contamination from the environment should be considered. In particular, primary food production should not be carried on in areas where the presence of potentially harmful substances (e.g. chemicals) would lead to an unacceptable level of such substances in food (…). - Ecuador suggests including the following in paragraph 37 under Temporary food establishments and vending machines: Such premises and structures should be located, designed and constructed to avoid, as far as reasonably practicable, the contamination of food and the harbouring of pests, in keeping with the laws of the country in question. - In the section on Personal hygiene facilities and toilets, paragraph 42, Ecuador recommends replacing the Spanish term "pilas" with "estaciones," to enhance understanding. **[Change does not apply to the English text]** - Ecuador proposes including the following text in paragraph 69: (…) Personnel may be required to put on clean protective clothing (which may be of a differentiating colour from other parts of the facility), including hair wear, footwear, and wash and disinfect their hands before entering. - In the section on Allergenic Cross-contact, paragraph 72, the following should be included: [Hazard identification should take into account the allergenic nature of some foods. Presence of allergens e.g. tree nuts (by species), fish (by species), crustacea (by species), milk, eggs and cereals containing gluten (not an inclusive list; allergens of concern differ among countries)… - We suggest deleting the following from paragraph 100 on Preventing access: (...) Animals should, wherever possible, be excluded from the grounds of factories and food processing plants.[Change does not apply to the English text] - Ecuador recommends changing paragraph 113 on Personal Cleanliness, as follows: To clean the hands, personnel should wash them with soap and water by wetting hands with water and applying sufficient soap to cover all surfaces. Scrub hands together for at least 20 seconds. Rinse your hands with running water (preferably potable), dry them thoroughly with a single-use towel or other similar method to reduce moisture and contamination on the hands after washing. The drying method should not aerosolize moisture from hands during the drying process. Multiple use drying towels should not be used. Where appropriate, hand sanitizers can be used, but should not replace hand washing and should be used only after hands have been washed and dried.	**Ecuador**

- Ecuador suggests including the following in paragraph 115 on Personal Behavior: Personal effects such as jewellery, watches, pins, cellular phones or other items such as, false nails/eye lashes should not be worn or brought into food handling areas if they pose a threat to the safety and suitability of food.	
Issue/Background Para. 42, **Question 4**. The question of whether there is need to include a paragraph to discuss monitoring of temperature of premises, equipment and food. Position Gambia does not support the inclusion of any additional paragraph. However, recommends to modify para. 43 to read, "Where temperature is important to ensure safety and suitability of food, the temperature should be monitored and, as appropriate, recorded." Justifcation Certain food require controlled environment for minimizing the growth and multiplication of microorganisms during production. Issue/Background Para. 40. The use of the term 'malicious' in the sentence. Position Gambia recommends the replacement of the word 'malicious' with 'intentional' so the sentence reads "Containers used to hold hazardous substances prior to disposal should be identified and, where appropriate, be lockable to prevent malicious intentional or accidental contamination of food" Rationale: The term 'intentional' is the standard term used. Issue/Background Para. 9: Choosing between the use of "primary production" or 'production' Position: Gambia recommends putting the phrase "including primary production" in brackets after the word 'production' so that the sentence reads, "This document provides a framework of general principles for producing safe and suitable food for consumption by outlining necessary hygiene and food safety conditions to be implemented in production (including primary production), manufacturing, preparation, storage, distribution and transport of food, including primary production, and where appropriate, specific food safety control measures at certain steps throughout the food chain" Justification In order to improve the flow of text and avoid repetition. The paragraph makes reference to primary production which is already taken care of by the use of the word 'production' in the sentence. Issue/Background Is the table of comparison GHPs and HACCP useful? Position Gambia is of the opinion that the table is useful. Justification The comparison in the table addresses the concerns of CCFH49 on clarifying GHP and HACCCP. Issue/Background Para. 1: Use of the words 'should' or 'need to' in the sentence "Food Business Operators (FBOs) [should] [need to] be able to control hazards relevant to their business and be able to produce and provide safe food." Position Gambia recommends the use of the word 'should' instead of 'need to'.	**Gambia**

Justification The use of the word 'should; is in harmony with the Codex terminology and reflects the principles of strict liability which implies that FBOs have the primary responsibility for ensuring food safety.	
we agree with your changes, and we have no comment.	**Iraq**
Norway appreciates the effort of the United Kingdom, France, Ghana, India, Mexico and the United States of America have put into preparing the Proposed Draft Revision of the General Principles of Food Hygiene (CAC/RCP 1-1969) and its HACCP annex, CX/FH 18/50/5. Please find our general comments and our comments on the questions referred to in paragraph 10 of the EWG report below. Further comments will be provided during the meeting. We are of the opinion that the document should be revised and aligned with other relevant documents. For consistency, CCP and HACCP in CCFH documents and CCFFP documents should as much as possible be in line and harmonized. **Question 1.** There has been mixed views about table "Comparison of GHP and HACCP Controls – views are requested on wether it is useful or whether it should be deleted. We are of the opinion that it is useful to include the table "Comparison of GHPs and HACCP Controls. **Question 2**. Are there any FAO/WHO programmes which can be referenced here? No comments. **Question 3.** Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here? We agree that the original text from CXC 1–1969 fits in the section of water. **Question 4**. Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food? We believe that there is not a need to such a paragraph. **Question 5.** Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be used within the text. We are of the opinion that «Sanitiation» is best to use, because this word includes both cleaning and disinfection (when necessary). **Question 6.** Validation has been added to Principle 6 on verification because the application text for Principle 6 included a statement on validation. However, it may be more appropriate to include 'Validation' under Principle 3. What do members think? The definitions which were here have been moved to an earlier section. We think it is useful that validation has been added to Principle 6 on verification. It is also appropriate to include 'Validation' under Principle 3. We suggest that "Validation" are included under both principles. Under Principle 6 it could be useful to use the wording "Re-validation". **Question 7**. Decision tree at Diagram 2 provided by Brazil and amended by UK. Are Members content with this inclusion? We accept the improved decision tree at Diagram 2. However, we suggest to clarify the meaning of "higher GHP control". Many countries refer to this as OPRPs. **Question 8**. This section has been retitled and includes additional text – are members content with the amendments? We are content with the amendments.	**Norway**
We are generally in agreement with the draft position and we would like to propose addition of the following points under General comments: • We suggest an alignment with ISO 22000/22002 for some items that may cause confusion with Food Business Operators (FBOs) following the mentioned standard • Further alignment in terms of format, structure and definitions to ISO 22000/22002 should be considered, for example, the notion of food safety control system would be preferred to food hygiene system.	**Philippines**
1. **The concept of** '**hazard analysis**' **or** '**review of hazards**' **in GHP Chapter** We agree that the concept of 'hazard analysis' should not be in the requirement of the GHP Chapter. We would also like to emphasize the	**Thailand**

outcome of CCFH49, which was stated in CRD2, that all businesses should be able to understand and be aware of hazards associated with their businesses, and the control measures required to manage these hazards [as appropriate]. We would like to emphasize that food business operators should be able to demonstrate or express their understanding and awareness through various forms. The term 'review of hazards' used in the Draft implies the written formal review which is more or less similar to 'hazard analysis' and might be a burden for farmers and small holders. Also, we do not support the adding of definition on 'review of hazards'. We would like to suggest not to create this new term but rather explain by a sentence on what we expect the FBO to be or to know. **2. The term 'enhanced GHPs'** Thailand agrees with the recommendation made by the Co-chairs that the concept of 'enhanced GHPs' as a category of control should not be included in the document. The additional information to highlight that some GHPs require additional attention will help the food business operator in understanding rather than introducing the new concept of 'enhanced GHPs' which will further complicate the food business operator during GHP and HACCP application. **3. The term 'GHP that requires higher level of control'** We concern that the terms 'GHP that requires higher level of control' might still be interpreted as a category of control specifically in the suggested Flowchart in page 34. Also, we would like to have a clarification that the term 'GHP that requires higher level of control' is not viewed as a category of control but it is the GHP that may have more frequency of monitoring and verification depending on the associated risk. **4. The added detail in paragraph 54-60** We still think that the requirements are too stringent for FBOs who only apply GHP. The text provided in Product description (paragraph 54-56) and Process description (paragraph 57) are more prescriptive than that of the HACCP Chapter. **5. Primary production** We would like to seek a clarification related to Primary Production. In the current Draft, is it correct that the primary producers are subject to the requirements in the Primary Production but they are not subject to the requirements under Sections 1-7? The detail in Sections 1-7 is more suitable for the food processing establishment. This is also in line with the current CXC1-1969 and other specific Code of Hygienic Practices.	
The United States was one of several co-chairs for the development of this document. We appreciate all the input received from the other co-chairs and the working group members. We look forward to country comments that can improve the text. We agree with the working group's decision to not use the term "enhanced GHPs," but we think that noting the need to pay additional attention to some GHPs because of their impact on food safety is an important statement in updating the General Principles of Food Hygiene. The document does not specify when a GHP requires additional attention, thus providing the flexibility for food business operators that is needed given the diversity of food businesses for which these GHPs are applicable. Based on discussions with other countries, we find there continues to be concern about food businesses conducting a hazard analysis or even undertaking a review of potential hazards. Some countries support FBOs conducting a hazard analysis as described in the HACCP chapter, others object to requiring any type of analysis or review of hazards (indicating that CCFH agreed that all FBOs need to "be aware" of the hazards associated with their operation), and others have indicated that the document is unclear as to what exactly this process of reviewing hazards entails. We believe that all FBOs need to be aware of the hazards and controls for these hazards that are applicable to their business, as noted in paragraph 4, but more text may be needed to explain how FBOs become aware of this information. We may be able to address concerns by removing mention of a "review of hazards" and simply say that FBOs may need to review information from competent authorities, food business organizations, food safety training courses or other sources to understand hazards and appropriate control measures. This will need to be discussed at the PWG held just prior to CCFH50, and could require changes in several places in the document. There are a number of specific questions posed by the working group. We will address these questions in our specific comments. One overarching issue relates to the use of the term "chapter" in this document (in square brackets). "Chapters" seem more appropriate for much longer documents. We think it would be appropriate to consider that the document has 3 parts – Part 1 - the introduction, which discusses the interrelationship of GHPs and HACCP, Part 2 – GHPs, and Part 3 – HACCP.	**USA**

Uruguay reiterates that the document should be clear, user friendly, and easily understood by stakeholders; we find this draft to be more user friendly that the previous version. We agree with the three parts of the document (Introduction, GHP, and HACCP). We agree with the electronic working group (eWG) that the inclusion of a new term (enhanced GHP) could be confusing for document users. However, Uruguay does maintain that some GHPs require more attention given their impact on safety. We, therefore, support the document being explicit in this aspect with recommendations for any necessary increased monitoring, verification, or documentation, where applicable. Regarding the necessary actions food business operators (FBOs) should conduct to manage hazards in their businesses, Uruguay asserts that the document should clearly note that sometimes the FBOs themselves are unable to carry out their own hazard analysis and that, in these cases, it is sufficient for them to be conscientious of the potential hazards associated with their business processes and to understand appropriate control measures to control these hazards. To this end, we believe that the document should be sufficiently open, such that it is up to the discretion of the competent control authorities, based on the nature and complexity of the businesses, to decide which FBOs should conduct their own hazard analysis. We also find the use of the term 'hazard review' throughout the document to be confusing. We think that the scope of this term should be clarified if it were necessary to include it. As regards the section on Primary Production under the Good Hygiene Practices chapter, we believe it should be made sufficiently clear that some of the points addressed in the document could also be applicable to Primary Production.	**Uruguay**
The document has significantly advanced and would like to support the progress of this document. This version is introducing the concept of 'Controls' as a noun and it is not clear from reading whether it refers to something different from HACCP-based 'Control measures'. For example table of paragraph 7 of Introduction: o Title is 'Comparison of GHPs and HACCP Controls'; but o Table compares 'GHPs' and 'HACCP control measures' - In line with directions/mandate given by CCFH, we strongly support introducing a 2nd category of control measures = control measures whose attributes (monitoring, action in case of deviation) are such that step at which they are applied cannot be regarded as a CCP. See specific comments on - The concept of 'review of hazards' is new and can cause confusion with the hazard analysis of HACCP. Same issue with concepts of 'prerequisite programmes (PRP)' and 'GHPs'. The document should make clear that, when HACCP is applied, GHPs constitute prerequisite programmes to HACCP (or, in other words, hazard analysis is conducted on the basis of application of GHPs).	**FoodDrinkEurope**
We do not believe that specific sections on 'Primary production' or 'Transportation' are useful and relevant to this document: it should describe GHPs in broad terms irrespective of the food chain sector. Sector-specific codes of practice are or can be developed on top of this document. Elements included in these sections 'Primary production' and 'Transportation' should be moved to other sections of the GHP-part if relevant and not duplicated. The 'control of operation' section contains elements that fall in the scope of HACCP. These should be moved there if not duplicated. Generally speaking, this section looks like a melting pot. We suggest that GHP-specific elements be moved to the right sections and Management-specific elements be moved to a dedicated 'Management' chapter that could cover 'Training' as well. suggest the following outline for the GHP-part: - Section 1: 'Establishment design and facilities' - Section 2: 'Establishment maintenance, sanitation and pest control' - Section 3: 'Personal hygiene' - Section 4: 'Product information and consumer awareness' Chapter 3 (new chapter on top GHP and HACCP): 'Management' The concept of 'review of hazards' is new and can cause confusion with the hazard analysis of HACCP. Same issue with concepts of 'prerequisite programmes (PRP)' and 'GHPs'. The document should make clear that, when HACCP is applied, GHPs constitute prerequisite programmes to HACCP (or, in other words, hazard analysis is conducted on the basis of application of GHPs). Keep 'hazard analysis' as part of HACCP with GHPs being prerequisites to HACCP	**Safe Supply of Affordable Food Everywhere**

In line with directions/mandate given by CCFH, we strongly support introducing a 2nd category of control measures = control measures whose attributes (monitoring, action in case of deviation) are such that step at which they are applied cannot be regarded as a CCP See specific comment on paragraph 7 of Introduction. Chapter 2 on HACCP can and should be revised accordingly. This version is introducing the concept of 'Controls' as a noun and it is not clear from reading whether it refers to something different from HACCP-based 'Control measures'. For example table of paragraph 7 of Introduction: - Title is 'Comparison of GHPs and HACCP Controls'; but - Table compares 'GHPs' and 'HACCP control measures' Keep the term 'control measure' for reference to actions and activities necessary to control significant food safety hazards, as determined by hazard analysis as part of HACCP.	

SPECIFIC COMMENTS	MEMBER / OBSERVER AND RATIONALE
PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE(CXC 1-1969)	
	Chile This new draft is more understandable than the previous one. We congratulate the eWG for its work.
	Jamaica Jamaica supports the revision of this document and also believes the layout of the document in three sections facilitates an ease of understanding of the text.
	AU African Union finds the document generally acceptable, and recognize the improvement made on the document based on recommendations of CCFH49. The document is concise and thorough. It provides one-stop guidance to Food Business Operators (FBO) at all levels in addition to flexibility in its application. The document is also user friendly and will facilitate compliance to the production of safe and suitable foods.
INTRODUCTION	
	Argentina Argentina appreciates the opportunity to submit comments and commends the Electronic Working Group for its work on this document. Argentina does not agree with including the term "Enhanced Good Hygiene Practices." In the Spanish version of the document, each instance of "análisis de peligros," in reference to GHP, should be changed to "revisión de peligros" (hazard review), to reflect the correct English rendition.
People have the right to expect the food that they eat to be safe and suitable for consumption… Food Business Operators ~~(FBOs)~~ ~~[should]~~ (FBOs) [need to] be able to control hazards relevant to their business and be able to produce and provide safe food.	**Chile** Leave "need to" because is their responsability
People have the right to expect the food that they eat to be safe and suitable for consumption…Food Business Operators (FBOs) ~~[should]~~ ~~[need to]~~ [should] be able ~~to~~ to understand and control hazards relevant to their business and be able to produce and	**USA** FBOs need to understand the hazards in order to control them. We also think "should" is more appropriate for a Codex document.

provide safe food.	
People have the right to expect the food that they eat to be safe and suitable for consumption… Food Business Operators (FBOs) ~~[should] [need to]~~ shall be able to control hazards relevant to their business and be able to produce and provide safe food.	**Philippines** Rationale: Food safety is the primary responsibility of FBOs and it is non-negotiable. Thus, the term "shall" (which also equates to need to) is being proposed to be used which is a verbal form to express that a provision is a requirement (no deviation is permitted) as per Sec. 7.2 of ISO/IEC Directives Part 2 Principles and rules for the structure and drafting of ISO and IEC documents. Also, the use of the word "shall" isconsistent with the IRR of RA No. 10611, the "Philippine Food Safety Act of 2013".
People have the right to expect the food that they eat to be safe and suitable for consumption...Food Business Operators (FBOs) [should] ~~[need to]~~ **[need to]** be able to control hazards relevant to their business and be able to produce and provide safe food.	**Brazil** Rationale: Must be used the verb that represents more obligation in the English language.
People have the right to expect the food that they eat to be safe and suitable for consumption… Food Business Operators (FBOs) ~~[should] [need to]~~ should be able to control hazards relevant to their business and be able to produce and provide safe food.	**India** Use of "should" defines a responsibility, while "need to" implies an intent. In view of this it is proposed that "should" be retained and "need to" be deleted.
People have the right to expect the food that they eat to be safe and suitable for consumption… Food Business Operators (FBOs) ~~[should] [need to]~~ should be able to control hazards relevant to their business and be able to produce and provide safe food.	**IDF**
	AU African Union recommends the use of the word 'should' instead of 'need to'. The use of the word 'should; is consistent with the Codex terminology and reflects the principles of strict liability which implies that FBOs have the primary responsibility for ensuring food safety.
People have the right to expect the food that they eat to be safe and suitable for consumption… Food Business Operators (FBOs) [should] ~~[need to]~~ be able to control hazards relevant to their business and be able to produce and provide safe food.	**Gambia**
People have the right to expect the food that they eat to be safe and suitable for consumption... Food Business Operators (FBOs) ~~[should] [need to]~~ should be able to control hazards relevant to their business and be able to produce and provide safe food.	**Senegal** Use of the word "should" is consistent with Codex terminology and reflects the principles of strict liability which implies that FBOs have the primary responsibility to guarantee food safety.
People have the right to expect the food that they eat to be safe and suitable for consumption... ~~[should] [need to]~~ should be able to control hazards relevant to their business and be able to produce and provide safe food.	**Morocco** Use of the word "should" is consistent with Codex terminology and reflects the principles of liability which implies that professionals are primarily responsible for the safety of their food.
People have the right to expect the food they eat to be safe and suitable for consumption...	**Panama** Panama proposes replacing "should" with "need to." Food Business Operators (FBOs) need to be able to control hazards relevant to their business and be able to produce and provide safe food.
People have the right to expect the food they eat to be safe and suitable for consumption... Foodborne illnesses and foodborne injury caused by contamination are,…Food Business Operators	**Nicaragua** Food itself does not cause injury, per se; Nicaragua, therefore, suggests including the term

(FBOs) ~~[should] [need to]~~ need to be able to control hazards relevant to their business and be able to produce and provide safe food.	"contaminated" to avoid confusion.
People have the right to expect the food that they eat to be safe and suitable for consumption… Food Business Operators (FBOs) ~~[should]~~ [need to] be able to control hazards relevant to their business and be able to produce and provide safe food.	**Argentina**
People have the right to expect the food they eat to be safe and suitable for consumption. Foodborne illness and foodborne injury are at best unpleasant and, in some circumstances, can be severe or fatal or have a,negative impact on human health over the longer term. ...Food Business Operators (FBOs) ~~[should]~~ [need to] be able to control hazards relevant to their business and be able to produce and provide safe food.	**Colombia** Colombia suggests this wording. Colombia supports the use of the phrasing 'need to', but the Spanish wording, in keeping with previously studied paragraphs, should be changed to 'deben'. [Change does not apply to the English text]
People have the right to expect the food they eat to be safe and suitable for consumption...	**Costa Rica** Costa Rica proposes adding the following to the end of the paragraph: …"safe food for consumers." Regarding the terms [should] [need to], Costa Rica supports [need to]. Strike: "of earning, unemployment and litigation." Rationale. The idea is repeated in the following sentence. Costa Rica proposes striking: "are at best unpleasant and, in some circumstances," Rationale: this part of the sentence contains no useful information relevant to these principles.
International food trade and travel are increasing, bringing important social and economic benefits…	**Panama** Panama agrees with this wording.
International food trade~~and travel~~ and the flow of travelers are increasing, bringing important social and economic benefits. ~~But this also~~However, this makes the spread of illness around the world easier. Eating habits too, have undergone major changes in many countries and...	**Nicaragua** These changes improve understanding of the text.
International food trade and travel are increasing, bringing important social and economic benefits. But this also makes the spread of illness around the world easier…Everyone, including primary producers, importers, manufacturers and processors, food warehouse/logistics operators, food handlers, retailers, and consumers, has a responsibility to ensure that the food is safe ~~and suitable~~ for consumption…	**Colombia** [First change does not apply to the English text] Colombia proposes striking "and suitable," given that the HACCP focuses on safety.
International food trade and travel are increasing. **Although this brings** ~~**bringing**~~ **about** important social and economic benefits, ~~But this~~ **it may also make** the spread of illness **around the world** easier…	**Costa Rica**
This document outlines the general principles that should be understood and followed by FBOs at all stages of the food chain and…The 5 keys are: 'keep clean, separate raw and ~~cooked~~cooked food, cook thoroughly, keep food at safe temperatures and use safe	**Philippines**

water and raw materials'.	
This document outlines the general principles that should be understood and followed by FBOs at all stages of the food chain and… Taking into account the point in the food chain, the nature of the ~~business~~product, the relevant contaminants, and whether the relevant contaminants adversely affect safety, suitability or both, these principles will enable food businesses to develop their own food hygiene procedures and necessary food safety control measures, while complying with requirements set by competent authorities~~. While it is the FBOs' responsibility to provide safe food, for some FBOs this may be as simple as ensuring that the .WHO 5 keys for Safer Food are adequately implemented. The 5 keys are: 'keep clean, separate raw and cooked, cook thoroughly, keep food at safe temperatures and use safe water and raw materials'.~~	**Brazil** Rationale: Brazil believes that the replacement of the term "nature of business" to "nature of product" is more assertive for determining control measures based on GHP and HACCP. Brazil suggests the removal of the last sentence, since it is out of context. As the paragraph does not explicitly separate food service from industrial food production brings confusion. There seems to be no need to apply other control measures in the industry beyond the WHO 5 keys. We understand that this situation applies to food service only. In industrial production it is still necessary to apply at least the pre-requisite programs.
This document outlines the general principles that should be understood and followed by FBOs at all stages of the food chain and that provide a basis for competent authorities to oversee food safety and suitability. … While it is the FBOs' responsibility to provide safe food, for some FBOs this may be as simple as ensuring that the WHO 5 keys for Safer Food are adequately implemented ~~The 5 keys are~~: 1) keep clean, 2) separate raw and cooked, 3) cook thoroughly, 4) keep food at safe temperatures and 5) use safe water and raw materials.	**Costa Rica** We would change the third part of this paragraph as follows: … provide safe food, for some FBOs this may be as simple as ensuring that the WHO 5 keys for Safer Food are adequately implemented: 1) keep clean, 2) separate raw and cooked, 3) cook thoroughly, 4) keep food at safe temperatures and 5) use safe water and raw materials.
This document outlines the general principles that should be understood and followed by FBOs at all stages of the food chain and that provide a basis for competent authorities to oversee food safety and suitability. Taking into account the point in the food chain, the nature of the business,...	**Nicaragua** **[Change does not apply to the English text]**
In order to ensure that the hazards associated with their business are properly managed, FBOs should undertake a review of potential hazards…	**Argentina** **[Change does not apply to the English text]**
In order to ensure that the hazards associated with their business are properly managed, FBOs should undertake a review ~~of~~ to identified potential hazards. The complexity of the review can be adapted to the nature of the business. At a simple level this might require an awareness that preventing illness should be addressed using ~~basic control measures such as cooking~~ WHO 5 keys for Safer Food and ~~chilling~~Prerequisite Programmes (PRPs), but in ~~more complex businesses~~some FBO, this could require more comprehensive analyses and a detailed understanding of specific hazards involved and the appropriate interventions (e.g. the application of Good Hygiene Practices (Chapter 1) ~~or~~ and HACCP principles, as described in Chapter 2).	**Brazil** Rationale: The term "basic control measures" has been replaced by PRPs and WHO 5 keys, as there may be confusion with the use of a new term, without defining it. We take the term "complex business" as well, since we understand that the complexity of the review of potential hazards depends directly on the processing stages of the product/ food.
In order to ensure that the hazards associated with their business are properly managed, FBOs should ~~undertake a~~ be able to understand and be aware of hazards associated with their	**Thailand** From the concern that the term 'review of hazard' used in the Draft might implies that the written

businesses, and the control measures required to manage these hazards, as appropriate. A review of potential ~~hazards~~hazards may be undertaken…	formal review is required, we would like to propose the amendment in para 4 as specified.
In order to ensure that the hazards associated with their business are properly managed, FBOs should be aware of the potential hazards and, in certain cases, undertake a review of these hazards…	**Uruguay**
In order to ensure that the hazards associated with their business are properly managed, FBOs should undertake a ~~review of potential hazards~~hazard analysis. The complexity of the ~~review~~ analysis can be adapted to the nature of the business… and the appropriate interventions ~~(e.g. the application of Good Hygiene Practices (Chapter 1) or HACCP principles, as described in Chapter 2).~~	**FoodDrinkEurope** Paragraph 4 should come after paragraph 5 on GHPs. It refers to HACCP part. Replace the term 'review of hazard' by 'hazard analysis' and make clear that GHPs are prerequisite to HACCP
In order to ensure that the hazards associated with their business are properly managed,..	**Safe Supply of Affordable Food Everywhere** This paragraph should come after paragraph 5 on GHPs. It refers to HACCP part Replace the term 'review of hazard' by 'hazard analysis' Recommended new text: In order to ensure that the hazards associated with their business are properly managed, FBOs should undertake a hazard analysis. The complexity of the hazard analysis can be adapted to the nature of the business. At a simple level this might require an awareness that preventing illness should be addressed using basic control measures such as cooking and chilling, but in more complex businesses, this could require more comprehensive analyses and a detailed understanding of specific hazards involved and the appropriate interventions
Good Hygiene Practices (GHPs) lay the foundation for the production of safe and suitable food… ~~For some other activities, Prerequisite Programmes (PRPs), which include GHPs, Good Manufacturing Practices (GMPs) and Good Agricultural Practices (GAPs), as appropriate, should be applied.~~	**Argentina** Argentina proposes striking this section of the paragraph, as it is confusing.
Good Hygiene Practices (GHPs) lay the foundation for the production of safe and suitable food… For ~~example, the cleaning of equipment and surfaces which come in contact with ready-to-eat food would normally warrant a greater level of control and frequency of monitoring than, say, the cleaning of walls and ceilings, because if food contact surfaces are not properly cleaned, this could lead to direct contamination of food. For~~ some other activities, Prerequisite Programmes (PRPs), which include GHPs, Good Manufacturing Practices (GMPs) and Good Agricultural Practices (GAPs), as appropriate, should be applied.	**Brazil** Rationale: In this case the example is not necessary for understanding the paragraph.
Good Hygiene Practices (GHPs) lay the foundation for the production of safe and suitable food…	**Chile** Delete this sentence from the original paragraph since talks about PRP that are not used un this draft and also said that BPH are art of PRP but in other sections of this document are addressed as separate things. Also if GMP´s are going to be in the draft, it is needed to include the term in defibitions sections to

	differentiate from BPH on the manufacturing process.
Good Hygiene Practices (GHPs) lay the foundation for the production of safe and suitable food… For example, the cleaning of equipment and surfaces which come in contact with ready-to-eat food would normally warrant a greater level of control and frequency of monitoring than ~~say,~~ **other areas such as** cleaning of walls and ceilings,...	**Costa Rica**
Good Hygiene Practices (GHPs) lay the foundation for the production of safe and suitable food… For ~~example, the cleaning of equipment and surfaces which come in contact with ready-to-eat food would normally warrant a greater level of control and frequency of monitoring than, say, the cleaning of walls and ceilings, because if food contact surfaces are not properly cleaned, this could lead to direct contamination of food. For~~ some other activities, Prerequisite Programmes (PRPs), which include GHPs, Good Manufacturing Practices (GMPs) and Good Agricultural Practices (GAPs), as appropriate, should be applied.	**Switzerland** What does "other activities" in the last sentence mean? proposal to delete: repeated in para 19 the last sentence of para 5 Needs rewording. "other activities" is not clear. Also, the sentence provides a Definition for PRP which is not correct. We propose to refer directly to ISO.
Good Hygiene Practices (GHPs) lay the foundation for the production of safe and suitable food. GHPs maintain the hygiene of a process and apply broadly to all food businesses. It should be noted ~~that for some GHPs a higher level of control~~ that, based on the risk associated with the food, more attention (e.g. ~~with~~ increased monitoring and verification) may be needed for some GHPs to provide safe and suitable food, and ~~thus~~ the ~~level of control and the~~ frequency of monitoring and verification will need to be applied appropriately. For example, the cleaning of equipment and surfaces which come in contact with ready-to-eat food would normally warrant ~~a greater level of control and frequency of~~ greater attention, with more frequent monitoring and verification than, say, the cleaning of walls and ceilings, because if food contact surfaces are not properly cleaned, this could lead to direct contamination of food. ~~For some other activities, Prerequisite Programmes (PRPs), which include GHPs, Good Manufacturing Practices (GMPs) and Good Agricultural Practices (GAPs), as appropriate, should be applied.~~	**USA** Rationale: "GHPs needing more attention" is clearer than "GHPs needing a higher level of control." The sentence at the end is deleted because it is confusing. The paragraph begins by noting that GHPs lay the foundation for safe and suitable food, and then mentions that some GHPs need more attention. It then says that prerequisite programs, which include GHPs, should be applied to "other activities." Which "other activities"? Does this mean that some GHP activities are prerequisite programs and others are not? While we agree that the programs listed may be "prerequisite programs," the sentence is out of place here.
Good Hygiene Practices (GHPs) lay the foundation for the production of safe and suitable food…	**Uruguay** "For some other activities, …as appropriate,…" Uruguay finds this phrasing to be confusing. While the document should include the application of good practices throughout the entire chain, it should be clear whether or not the term Prerequisite Programmes will be used; if so, it should be defined under "Definitions."
It is recognised that implementation of HACCP principles may be challenging for some businesses,… This will indicate whether GHPs are sufficient to address the safety and suitability of food associated with the operation, based on a hazard review or whether HACCP-based controls are required…	**Colombia** Colombia proposes including "based on a hazard review," since the working document is based on the HACCP.

It is recognised that implementation of HACCP principles may be challenging for some businesses,…	**Panama** Panama proposes reviewing the definition of "HACCP System." Applying principles is different from determining CCP at a certain point of the chain (primary production).
It is recognised that implementation of HACCP principles may be challenging for some businesses, e.g. primary production,… where it can be difficult to establish Critical Control Points (CCPs). In reviewing operations and potential ~~hazards~~hazards relevant to the food business,…	**USA**
It is recognised that implementation of HACCP principles may be challenging for some businesses, e.g. primary production,… where it can be difficult to conduct a hazard analysis and establish Critical Control Points (CCPs). In ~~reviewing operations and potential hazards, including~~ conducting …This will indicate whether GHPs are sufficient to address the safety and suitability of food associated with the operation or whether HACCP-based ~~controls~~ control measures are required. FBOs without the resources to carry out a site-specific ~~review of hazards~~ hazard analysis may use external resources… such as existing HACCP models provided by the competent authority or food industry[1], references, standards, regulations, or Codes of Practice and adapt these to the specific site circumstances.	**FoodDrinkEurope**
It is recognised that implementation of HACCP principles may be challenging for some businesses, e.g. primary production,…	**Safe Supply of Affordable Food Everywhere** Recommend changing the text to: It is recognised that implementation of HACCP principles may be challenging for some businesses, e.g. primary production, where it can be difficult to conduct a hazard analysis and establish Critical Control Points (CCPs). In conducting a hazard analysis within the HACCP framework, FBOs should consider the GHPs that are being, or that have been, established and how effective they are or will be at controlling the hazard. This will indicate whether GHPs are sufficient to address the safety and suitability of food associated with the operation or whether HACCP-based control measures are required. FBOs without the resources to carry out a site-specific hazard analysis may use external resources such as existing HACCP models provided by the competent authority or food industry, references, standards, regulations, or Codes of Practice and adapt these to the specific site circumstances.
[Chapter One] of this document describes GHPs…	**Canada** Canada supports using the terms [Chapter one] and [Chapter two] throughout the document.
~~[~~Chapter One] of this document describes GHPs, which are the basis of all food hygiene systems to support the production of safe and suitable food. ~~[~~Chapter Two~~]~~ describes HACCP. HACCP principles can be applied throughout the food chain…	**Nicaragua**
[Chapter One] of this document describes GHPs,…	**Panama** Panama proposes: "…CCP control measures…" instead of "HACCP control measures."
[Chapter One] of this document describes GHPs,… The following comparison table shows the relationship of GHPs applied for food	**Switzerland**

safety and suitability and HACCP control measures applied to ~~enhance food safety~~address specific Food safety hazards.	
[Chapter One] of this document describes GHPs…	**AU** AU recommends the removal of square brackets in para.7. The proposed insertion of "Chapter one" and "Chapter Two" is in line with CCFH49 decision to have the two chapters in the text.
[Chapter One] of this document describes GHPs…	**Safe Supply of Affordable Food Everywhere** The table is elevating GHPs to a level of control not seen before: validation, monitoring. Hazard analysis will determine whether a higher level of control is necessary (see flowchart proposed by Brazil at the end of the document). In that case the resulting activity becomes a control measure. Recommend change: Review the table so as to keep a clear separation between GHPs (before hazard analysis) and control measures (determined by hazard analysis).
Comparison of GHPs and HACCP Controls	**Brazil** Brazil agrees that the table be useful. In the item "Criteria", Brazil suggests further develop this example so that there is understanding of when the amount of ice may be an observable CCP. In the item "Monitoring", Brazil suggests removing the alternative text (to provide confidential CCP is in control, since the idea is already included in the introductory sentence to bullets.
Comparison of GHPs and HACCP Controls	**Morocco** Morocco believes that the comparison table for GHPs and HACCP is worthwhile. Rationale The comparisons in the table address the concerns of CCFH49 on clarifying the difference between GHPs and HACCP.
~~**Comparison of GHPs and HACCP Controls**~~	**Nicaragua** Nicaragua proposes deleting this table. GHPs are not comparable to HACCP; therefore, this table does not contribute to understanding the document.
Comparison of GHPs and HACCP Controls	**Philippines** The table is useful but we propose to move the table as an annex for reference purposes.
~~**Comparison of GHPs and HACCP controls**~~GHPs and HACCP Application Examples	**Senegal** GHPs and HACCP Application Examples The table is necessary, but the title should be changed. Rationale: the table is extremely helpful to ensure that affected food business operators have all the analyses needed to effectively implement GHPs and HACCP We propose changing the title from Comparison of GHPs and HACCP Controls to GHPs and HACCP Application Examples. It does not compare GHPs and HACCP, which are not the same, but instead lists examples that require the application of GHPs or HACCP. GHPs are the foundation on which HACCP is applied.
Comparison of GHPs and HACCP Controls	**FoodDrinkEurope** There has been mixed views about this table views are requested on whether it is useful or whether it should be deleted:

	The table is useful and we would propose to move this table as an annex. We would like to propose the following specific modifications: 1- "Validation of the effectiveness of the measure - where needed and generally not carried out by FBOs themselves". The phrase "where needed" is not clear and may result in ambiguity, therefore it would require clarifications. On the contrary to control measures intended for the control of significant hazards, validation is not required for GHPs. We therefore advise that no reference be done to validation when it comes to GHPS, keep it for control measures only Rationale: To avoid ambiguity and provide clarity to the text 2- "Validation of the effectiveness of the measure- HACCP control measures applied to enhance food safety) We would propose to replace the wording "should" by "shall" 3- "Criteria"-HACCP control measures applied to enhance food safety The sentence describing the quantity of ice where necessary for food safety is not clear and would require further explanations to ensure a good understanding. The word "appearance" as an example could be misinterpreted as an observable criteria. We would limit observable to visual checks of settings. Rationale: To provide clarity to the text. 4- "Monitoring- HACCP control measures applied to enhance food safety We would prefer the first proposal: "if not continuous, at appropriate frequency that ensures the critical limit has been met for every batch of products" Necessary here to introduce 2 types of control measures depending on the monitoring system (real-time or not, observation or measurement) 5- "Corrective actions when deviation is indicated- GHPs applied for food safety and suitability "For products: Usually not necessary": Text is not clear as this mentions that corrective actions for products are usually not necessary. Corrective actions result from deviations identified in monitoring and verification (also consumer complaints). These can require corrective actions such as blocking/disposing of product. Necessary here to introduce 2 types of control measures depending on corrective actions (correction of product non-conformity systematic or not, release after evaluation possible or not)
Q1: There has been mixed views about this table –views are requested on whether it is useful or whether it should be deleted.	**Argentina** Argentina suggests including the table as an appendix to the document, for ease of reading. However, the table contents should be revised to include some changes to the text.
Q1: There has been mixed views about this table –views are requested on whether it is useful or whether it should be deleted	**Canada** Canada would support retaining the Comparison table on page 5 of the document if it can help clarify the links and differences between GHP and HACCP. If it is decided that it will not be kept, some text from the "GHPs applied for food safety and suitability" column may need to be moved to [Chapter one] of the document. For example, the information on "Validation of the effectiveness of the measure" is not mentioned elsewhere in [Chapter one].
Q1	**Chile** Question 1: There has been mixed views about this table –views are requested on whether it is

	useful or whether it should be deleted The table is useful, but should be relocated as an annex at the end of the document, since some of the terms that address are not yet mentioned in the document and could create confusion.
Q1:	**Colombia** Colombia deems the table to be useful and proposes including it as an appendix.
Q1:	**Costa Rica** Costa Rica finds the proposed table to be a valuable tool that could be included at the end of the document as an appendix.
Q1	**Egypt** The Comparison of GHPs and HACCP Controls are very useful.
Q1 The comparison table should be retained in the document.	**India** This table is a precise elaboration of readily available comparison of GHP application vs HACCP control measures.
Q1	**Jamaica** Remove table 1 and place in an Annex
Q1	**Japan** This table should be kept in the document since it is useful.
Q1	**Kenya** We propose that the table on comparison of GHPs and HACCP(clause 7) to be annexed as additional information in the standard.
Q1	**Mauritius** • Question 1 - Yes, the table is useful. It could be enhanced as follows: - To replace the title of the third column by: "HACCP controls applied to enhance food safety". - "Scope", third column, to add before "a product or a group of products": specific to "production process steps and a product or a group of products". - "Verification", third column, to replace "control measures" by: "HACCP controls (control measures, monitoring against critical limits, corrective actions, documentation)". the table is about "HACCP controls" and is not limited to "control measures" which constitute one level of control at CCP steps. HACCP controls are production process steps specific, as well as product specific. Verification applies to "control measures" and also other HACCP controls, namely, monitoring, corrective action and documentation.
Q1:	**Uruguay** Uruguay finds the table useful and suggests keeping it.
Q1	**AU** African Union further recommends that the table be moved to the annex and referenced in para. 7 of the introduction for ease of reading. African Union is of the opinion that the table is useful. The comparison in the table addresses the concerns of CCFH49 on clarifying GHP and HACCP.
GHPs ~~applied for food safety and suitability~~	**Brazil**
HACCP ~~control measures applied to enhance food safety~~	**Brazil**
HACCP control measures applied to ~~enhance food safety~~	**Switzerland**

	see comment para 7
~~HACCP~~ Food safety control measures applied to enhance food safety	**IDF/FIL** Removal of HACCP would cover the approach of ISO 22000 and will also be in line with the scope of GL 69 referenced under the text on "validation". Codex GL 69 (Validation) includes all food safety control measures having an impact on the hazard level, not only those identified as CCPs, and not GHPs.
HACCP control measures applied to enhance food safety	**Panama** Panama proposes: CCP controls instead of HACCP controls.
Generally, not specific to any hazard but results in reduction of likelihood of hazards occurring and in certain cases prevention of specific hazards e.g. undeclared allergens. Occasionally a GHP activity may target a specific hazard (e.~~g., sanitation~~g. cleaning-disinfection of food contact surfaces for control of *Listeria monocytogenes* in a ready-to-eat food processing environment).	**Senegal**
Specific to a ~~product~~ Food production process or group of products and necessary to reduce to acceptable level a hazard determined as significant by the hazard analysis.	**Switzerland**
Generally, not specific to any hazard but results in reduction of likelihood of hazards occurring and in certain cases prevention of specific hazards e.g. undeclared allergens. Occasionally a GHP activity may target a specific hazard (e.g. ~~sanitation~~ cleaning and disinfection of food contact surfaces for control of *Listeria monocytogenes* in a ready-to-eat food processing environment).	**USA** Retain the table as an annex with some modifications. Rationale: To avoid use of the term "sanitation." (This is explained further in response to Question 5.)
~~During a hazard analysis to determine hazards needing control measures at CCPs~~During a hazard analysis	**IDF** Simplification. The additional detail relating to the objective of hazard analysis is not needed here, and if retained, the reference in the end ("at CCPS") need to be removed to avoid conflict with the ISO 22000 approach.
Where ~~needed~~necessary, and generally not carried out by FBOs themselves….	**Canada** Paragraph 12 provides an explanation for why and when "where necessary" or "where appropriate" are used, but does not mention "where relevant" and "where needed". If the intent of these phrases is the same (which we think it is), consistent wording should be used.
Where needed, and generally not carried out by FBOs themselves…	**IDF** The text implies that all GHPs should be validated. It is not possible in general to validate many GHPs; This is independent on who is conducting the validation (the FBO or others). GHPs that are sufficiently important to need validation should be implemented as food safety control measures, as described by CODEX GL 69.
~~Yes, validation~~ Validation should be carried out (*Guidelines for the Validation of Food Safety Control Measures* CXG 69-2008)	**Japan**
GHPs may be observable (e.g. visual checks, appearance) or measurable (e.g. ATP tests of equipment cleaning, concentration of disinfectant), and deviations may require an evaluation of the impact on safety of the product (e.g. whether the frequency of cleaning complex equipment such as meat slicers is adequate).	**USA**
observable (e.g. visual checks of settings, appearance, quantity of	**Brazil**

ice where necessary for food safety).	Brazil suggests to further develop this example so that there is understanding of when the amount of ice may be an observable CCP.
observable (e.g. visual checks of settings, appearance, quantity of ice where necessary for food safety).	**Canada** We are questioning if some of the "observable" critical limits are too vague and subject to interpretation. For example, how can the "appearance" and the "quantity of ice" be used as critical limits? We suggest to include more information to explain the "observable critical limits".
observable (e.g. visual checks of settings, appearance, appropriate quantity of ice where necessary for food safety).	**India** quantity of ice where necessary for food safety' is not clear, as it is not an appropriate example of observable The word "appearance" as an example could be misinterpreted as an observable criterion. Hence, propose amendment.
Monitoring	**IDF** All food safety control measures applied should be monitored
Yes, where ~~relevant~~appropriate, to ensure procedures and practices are applied properly.	**Canada** Paragraph 12 provides an explanation for why and when "where necessary" or "where appropriate" are used, but does not mention "where relevant" and "where needed". If the intent of these phrases is the same (which we think it is), consistent wording should be used.
~~Yes~~Necessary, where relevant, to ensure procedures and practices are applied properly.	**Japan**
~~Usually non-continuous; frequency~~ Frequency dependent on the impact on the product's safety and suitability.	**Canada** Suggest to delete non-continuous or define "non-continuous" since some stakeholders consider, for example, a once per shift to be continuous.
if not continuous, at appropriate frequency that ensures the critical limit has been ~~met for every batch of products~~ met. ~~**ALTERNATIVE TEXT** to provide confidence the CCP is in control.~~	**USA** Rationale: It is not clear exactly what text would be replaced by the alternative text in the bullets above, but it seems to repeat the lead in to the bullets.
if not continuous, at appropriate frequency that ensures the critical limit has been met for every batch of products ~~**ALTERNATIVE TEXT** to provide confidence the CCP is in control.~~	**Brazil** In the item "Monitoring", Brazil suggests removing the alternative text (to provide confidential CCP is in control, since the idea is already included in the introductory sentence to bullets.
if not continuous, at appropriate frequency that ensures the critical limit has been met for every batch of products **ALTERNATIVE TEXT** ~~to provide confidence the CCP is in control.~~	**India** Square brackets need to be removed, as there would be some condition of food when it may pose health hazard. Like, hot tea, sharp edges of hard boiled condition and Swallowing of thick viscous liquids can cause choking e.g a thick sticky syrup that's difficult to gulp; Psyllium husk if dissolved in less water makes a thick gelatinous / sticky consistency mix which is difficult to swallow The first part of text is more clear and acceptable. No need to mention alternative text.
if not continuous, at appropriate frequency that ensures the critical limit has been met for every batch of products ~~**ALTERNATIVE TEXT** to provide confidence the CCP is in control~~.	**Japan** Japan supports the 1st option.
if not continuous, at appropriate frequency that ensures the critical limit has been met for every batch of products **ALTERNATIVE TEXT** ~~to provide confidence the CCP is in control.~~	**Canada** The alternative text is vague and open to interpretation.
For procedures and practices: ~~Yes~~Necessary.	**Japan**
For products: Usually not necessary…	**USA**

	We proposed to insert a bullet before "For products.'
For products: ~~Yes~~Necessary. Pre-determined actions for products.	**Japan**
For procedures and practices: ~~Yes~~Necessary, corrective actions to restore control and prevent recurrence.	**Japan**
~~Yes~~Necessary, where relevant, usually scheduled (e.g., visual observation that equipment is clean before use)	**Japan**
Yes, where ~~relevant~~appropriate, usually scheduled (e.g., visual observation that equipment is clean before use)	**Canada** Paragraph 12 provides an explanation for why and when "where necessary" or "where appropriate" are used, but does not mention "where relevant" and "where needed". If the intent of these phrases is the same (which we think it is), consistent wording should be used.
~~Yes.~~ Necessary, Scheduled verification of implementation of control measures e.g. through record review, testing, internal audit	**Japan**
~~Yes~~Necessary, where relevant to allow the FBO to assess whether GHPs are operating as intended	**Japan**
Yes, where ~~relevant~~ appropriate to allow the FBO to assess whether GHPs are operating as intended	**Canada** Paragraph 12 provides an explanation for why and when "where necessary" or "where appropriate" are used, but does not mention "where relevant" and "where needed". If the intent of these phrases is the same (which we think it is), consistent wording should be used.
~~Yes~~Necessary, to allow the FBO to demonstrate ongoing control of hazards	**Japan**
Yes, where ~~relevant~~appropriate	**Canada** Paragraph 12 provides an explanation for why and when "where necessary" or "where appropriate" are used, but does not mention "where relevant" and "where needed". If the intent of these phrases is the same (which we think it is), consistent wording should be used. *Category : EDITORIAL*
~~Yes~~Necessary, where relevant	**Japan**
Yes, where ~~relevant~~appropriate	**Canada** Paragraph 12 provides an explanation for why and when "where necessary" or "where appropriate" are used, but does not mention "where relevant" and "where needed". If the intent of these phrases is the same (which we think it is), consistent wording should be used.
~~Yes~~Necessary.	**Japan**
SCOPE	
This document provides a framework of general principles for producing safe and suitable food for consumption… preparation, packaging, storage, distribution and transport of food, including primary production, and where appropriate,...	**Colombia** The packaging process would also fall under the scope of the document, taking into consideration that paragraph 64 mentions packaging as one of the specific steps in the process.
This document provides a framework of general principles for producing safe and suitable food for consumption... distribution and transport of food, ~~including~~ (including primary ~~production,~~ production), and where appropriate,…	**Senegal**
This document provides a framework of general principles for producing safe and suitable food for consumption... distribution and	**Morocco** Rationale

transport of food, ~~including primary production~~, and where appropriate,…	In the Preamble (page 32), recital 133 states that HACCP principles can be considered from primary production to final consumption. But, one of the main difficulties when implementing HACCP principles is their application at primary production (e.g. cattle). Its exclusion from HACCP application in the "hygiene package" was an act of flexibility that is strongly recommended in this draft.
This document provides a framework of general principles for producing safe and suitable food for consumption… preparation, packaging, storage, distribution and transport of food, including primary production, and where appropriate,...	**Colombia** The packaging process would also fall under the scope of the document, taking into consideration that paragraph 64 mentions packaging as one of the specific steps in the process.
This document provides a framework of general principles for producing safe and suitable food for consumption by outlining necessary hygiene and food safety conditions to be implemented in ~~production~~production (including primary production), manufacturing, preparation, storage, distribution and transport of food, ~~including primary production,~~ and where appropriate, specific food safety control measures at certain steps throughout the food chain.	**AU** African Union recommends this change to improve the flow of text and avoidance of repetition. The paragraph makes reference to primary production which is already taken care of by the use of the word 'production' in the sentence.
USE	
The document is intended for use by food business operators… depending on their nature of product and ~~size~~size of food business…	**Brazil** Rationale: We understand that the complexity of the review of potential hazards depends directly on the processing stages of the product/food.
The document is intended for use by food business operators and competent authorities, as appropriate. It provides ~~flexibility~~ **basic information** to meet the needs of food businesses,…	**Costa Rica**
There will be situations where some of the specific requirements contained in this document are not applicable. The fundamental question for each food business operator in every case is "what is necessary and appropriate to ~~control the hazards associated with the operation and~~ ensure the safety and suitability of food for consumption?"	**USA** Rationale:The deleted text is not necessary – it is part of "to ensure the safety…of the food."
There will be situations where some of the specific requirements contained in this document are not applicable...is "what is necessary and appropriate to control the hazards associated with the operation and **how can I** ensure the safety and suitability of food for consumption?"	**Costa Rica**
The text indicates where such questions are likely to arise by using the phrases "where necessary" and "where appropriate"…	**IDF** suggest adding a new paragraph before 12. : Other approaches for implementing GHP the HACCP principles than those described in these guidelines exist and are appropriate to achieve the same objectives, such as the approach taken by the International Standardization Oganization (note: ISO 22000 - Food safety management systems —Requirements for any organization in the food chain)
cultivate a ~~strong~~ food safety culture by demonstrating their commitment to providing safe and suitable food and encouraging appropriate food safety practices;	**Thailand** Without the word 'strong', the sentence still expresses the focus of food safety by all personnel.
Consumers should play their role by following relevant guidance and instructions for food handling ~~and~~, preparation and storage and	**Colombia** Storage instructions for consumers also support food hygiene.

applying appropriate food hygiene measures.	
Consumers should play their role by following relevant guidance…	**FoodDrinkEurope** • (iii) and (v) are similar. Propose to delete the (iii) • Propose to reword the 'GENERAL PRINCIPLES' list as follows: o (i) Food safety hazards should be controlled using a science based preventive approach to ensure food safety and suitability. GHPs should ensure that food is produced in a sanitary environment in order to minimise the presence of contaminants. In some cases, GHPs may be sufficient to manage hazards associated with a food business to ensure food safety and suitability. o (ii) GHPs should provide the foundation for a HACCP system, where applied, to be effective o (iii) Some GHPs require more attention than others as they have a greater impact on food safety. o (iv) Each FBO should be aware of the hazards associated with the raw materials and other ingredients, the production or preparation process and the environment in which the food is produced and undertake a hazard analysis. o (v) FBOs should consider the GHPs and how effective they are at controlling the hazard. This will indicate whether GHPs are sufficient to ensure food safety or whether control measures are required o (vi) Control measures that are critical to maintain or reduce a significant hazard to achieve an acceptable level of food safety, including any GHPs as appropriate, should be scientifically validated o (vii) The application of control measures and/or GHPs should be subject to monitoring, verification, corrective actions, verification, and documentation, as appropriate. o (viii) Food hygiene systems should be reviewed periodically to determine if modifications are needed and when there is a significant change in the food business that could impact the hazard analysis or control measures (e.g. new process, new ingredient, new product, new equipment). o (ix) Communication on food safety and suitability should be maintained among all relevant parties as appropriate to ensure the integrity of the entire food chain. • Rationale: Avoid duplicity in the text DEFINITION Some definitions need to be reviewed to avoid confusion between GHPs and hazard control measures: Monitoring: The act of conducting a planned sequence of observations or measurements of control parameters to assess whether a CCP or a GHP procedure is under control control measure operates as intended. Validation: Obtaining evidence that a GHP or a control measure or combination of GHPs and/or control measures, if properly implemented, are capable of controlling hazards to a specified outcome. Primary production We do not believe that specific section on 'Primary production' is useful and relevant to this document: it should describe GHPs in broad terms irrespective of the food chain sector. Sector-specific codes of practice are or can be developed on top of this document. Elements included in this section 'Primary production' should be moved to other sections of the GHP-part if relevant and not duplicated.

GENERAL PRINCIPLES	
GENERAL PRINCIPLES **(I) FOOD SAFETY HAZARDS SHOULD BE CONTROLLED USING A SCIENCE BASED PREVENTIVE APPROACH TO ENSURE FOOD SAFETY AND SUITABILITY. GHPS SHOULD ENSURE THAT FOOD IS PRODUCED IN A SANITARY ENVIRONMENT IN ORDER TO MINIMISE THE PRESENCE OF CONTAMINANTS. IN SOME CASES, GHPS MAY BE SUFFICIENT TO MANAGE HAZARDS ASSOCIATED WITH A FOOD BUSINESS TO ENSURE FOOD SAFETY AND SUITABILITY.** **(II) GHPS SHOULD PROVIDE THE FOUNDATION FOR A HACCP SYSTEM, WHERE APPLIED, TO BE EFFECTIVE** **(III) SOME GHPS REQUIRE MORE ATTENTION THAN OTHERS AS THEY HAVE A GREATER IMPACT ON FOOD SAFETY.** **(IV) EACH FBO SHOULD BE AWARE OF THE HAZARDS ASSOCIATED WITH THE RAW MATERIALS AND OTHER INGREDIENTS, THE PRODUCTION OR PREPARATION PROCESS AND THE ENVIRONMENT IN WHICH THE FOOD IS PRODUCED AND UNDERTAKE A HAZARD ANALYSIS.** **(V) FBOS SHOULD CONSIDER THE GHPS AND HOW EFFECTIVE THEY ARE AT CONTROLLING THE HAZARD. THIS WILL INDICATE WHETHER GHPS ARE SUFFICIENT TO ENSURE FOOD SAFETY OR WHETHER CONTROL MEASURES ARE REQUIRED** **(VI) CONTROL MEASURES THAT ARE CRITICAL TO MAINTAIN OR REDUCE A SIGNIFICANT HAZARD TO ACHIEVE AN ACCEPTABLE LEVEL OF FOOD SAFETY, INCLUDING ANY GHPS AS APPROPRIATE, SHOULD BE SCIENTIFICALLY VALIDATED** **(VII) THE APPLICATION OF CONTROL MEASURES AND/OR GHPS SHOULD BE SUBJECT TO MONITORING, VERIFICATION, CORRECTIVE ACTIONS, VERIFICATION, AND DOCUMENTATION, AS APPROPRIATE.** **(VIII) FOOD HYGIENE SYSTEMS SHOULD BE REVIEWED PERIODICALLY TO DETERMINE IF MODIFICATIONS ARE NEEDED AND WHEN THERE IS A SIGNIFICANT CHANGE IN THE FOOD BUSINESS THAT COULD IMPACT THE HAZARD ANALYSIS OR CONTROL MEASURES (E.G. NEW PROCESS, NEW INGREDIENT, NEW PRODUCT, NEW EQUIPMENT).** **(IX) COMMUNICATION ON FOOD SAFETY AND SUITABILITY SHOULD BE MAINTAINED AMONG ALL RELEVANT PARTIES AS APPROPRIATE TO ENSURE THE INTEGRITY OF THE ENTIRE FOOD CHAIN.**	**Safe Supply of Affordable Food Everywhere** Better align with the principles already introduced at the beginning of the document, with proper sequence GHPs -> Hazard Analysis -> Control measures For point (v), keep the wording already used in item 6 of Introduction

Food safety hazards should be controlled using a science based preventive approach to ensure food safety and suitability, e.g. a Food Hygiene system. GHPs should ensure that food is produced in a sanitary environment in order to minimise the presence of contaminants…	**Switzerland** add term "Food Hygiene system". Else, it is used only in (viii)
Some ~~GHPs require more attention than others~~GHP's may need verification, validation or documentation, as they have a greater impact on food safety.	**Chile** Change redaction to " Some GHP´s may need verification, validation or documentation, as they have a greater impact on food safety". We not agree with categorized BPH in more or less attention, since all of them contribute to the food safety.
Some GHPs require more attention than others, as they have a greater impact on food safety.	**Philippines** Rationale: We propose to delete "iii" as the statement was already incorporated in "v"
~~Some GHPs require more attention than others, as they have a greater impact on food safety.~~	**Canada** Suggest deleting as this is covered under principle v.
~~Some GHPs require more attention than others, as they have a greater impact on food safety.~~	**AU** African Union recommends the deletion of the general principle in para. 15 (iii) as this principle is repeated in para.15 (v).
Some GHPs require more attention than others, as they have a greater impact on food safety.	**Panama** Panama maintains that point (iii) is contained under point (v).
Depending on the nature of the food business and the associated potential risks, hazards are controlled by GHPs and/or CCPs. While recognising the importance of CCPs in controlling specific hazards~~, some GHPs may also require more attention than others as they have a greater impact on food safety.~~ , Significant hazards not controlled by GHPs are controlled by specific control measures at CCPs.	**Chile** Eliminate sentence in bold. Same rationale as above. There is no need to categorize BPH in more or less attention, this could lead to FBO neglect some GHP that also contributes to food safety.
Depending on the nature of the food business and the ~~associated~~ potential ~~risks~~risks associated with its food, hazards are controlled by GHPs and/or ~~CCPs~~food safety control measures. While recognising the importance of CCPs in controlling specific hazards, some GHPs may also require more attention than others as they have a greater impact on food safety. Significant hazards not controlled by GHPs are controlled by specific control measures and/or at CCPs.	**IDF**
Controls that are critical to achieve ~~an acceptable level of food safety~~a Food Safety Objective, including any GHPs as appropriate, should be scientifically validated[2]	**Brazil** Rationale: Food Safety Objective (FSO) The maximum frequency and/or concentration of a hazard in a food at the time of consumption that provides or contributes to the appropriate level of protection (ALOP).
~~Controls~~ Controls, including any GHPs as appropriate, that are critical to achieve an acceptable level of food ~~safety, including any GHPs as appropriate,~~ safety should be implemented as food safety conrol measure and be scientifically validated[2]	**IDF** It is not possible in general to validate all GHPs; GHPs that are sufficiently important to need validation should be implemented as food safety control measures, as described by CODEX GL 69.
Controls that are critical to achieve an acceptable level of food safety, including any GHPs as appropriate, should be scientifically	**Panama** Panama proposes changing the paragraph as follows:

validated.[2]	(vi) Controls that are critical to achieve an acceptable level of food hazard should be scientifically validated.
The application of control measures and/or GHPs should be subject to monitoring, correction, corrective actions, verification, and documentation, as appropriate.	**Philippines** We propose to add the word "correction" to be consistent with ISO22000:2018 clause 3.9.
Food business managers should be committed to food safety…	**Colombia** [Change does not apply to the English text]
encouraging continuous improvement, where appropriate, taking into account developments in knowledge and technology;	**Thailand** How FBOs manage their organisation is out of the mandate of Codex. We propose to delete these two bullets or add the words 'where appropriate' as specified.
ensuring that food safety forms part of the strategic direction/objectives of the organisation, where appropriate.	**Thailand** How FBOs manage their organisation is out of the mandate of Codex. We propose to delete these two bullets or add the words 'where appropriate' as specified.
DEFINITIONS	
DEFINITIONS	**Philippines** • We propose the addition of "Potable water" in the definition of terms based on Page 4, CAC/RCP 53-2003 Code of Hygienic Practice for Fresh Fruits and Vegetables Potable water - water which meets the quality standards of drinking water such as described in the WHO Guidelines for Drinking Water Quality. • We propose the addition of "Correction" in the definition of terms based on ISO 22000:2018 clause 3.9. Correction: Action to eliminate a detected nonconformity. • We propose the addition of "Food Business Operators" and "Competent Authority" in the Definitionsto be consistent with Code of Practice on Food Allergen Management for Food Business Operators Food business operator (FBO) means the persons responsible for ensuring that the requirements of food law are met within the food business under their control, and includes producers, processors, wholesalers, distributors, importers, exporters, retailers, and food service operators. Competent Authority means the official government agency responsible for implementing food law.
DEFINITIONS	**Switzerland** Do we Need a Definition for "GHPs"?
DEFINITIONS	**Morocco** in the English version, there is a suggestion to define: "Review of hazards" Morocco recommends deleting this definition which is in brackets. Rationale Hazard analysis is part of an effective HACCP system.
DEFINITIONS	**Morocco** Morocco recommends including the definition of "potable water" in the Definitions section. Rationale The term "potable water" is used in the document, e.g. in paragraphs 38 , 41, 75, 78 and 80.
DEFINITIONS	**AU** African Union recommends the inclusion of the definition of "potable water" in the section for "definitions" to ensure uniform understanding of the term. The term has been used in several paragraphs of the documents e.g. para 38, 41, 75, 78 and 80.
DEFINITIONS	**Safe Supply of Affordable Food Everywhere**

	Keep concepts of validation and monitoring for control measures only so as to avoid making validation and monitoring mandatory for all GHPs When a GHP must be 'enhanced' by means of validation and monitoring, this decision follows hazard analysis and the resulting activity becomes a control measure.
Note: All the definitions contained in the document have been moved to this tion	**Nicaragua** We propose including a definition for GHP.
[**Clean water** – …	**Jamaica** This definition should await the FAO/WHO definition
[**Clean water** – …	**USA** We support the definition as written, but we have no objections to adding physical contaminants to the definition.
~~[**Clean water** – water that does not contain biological or chemical contaminants at a level that would compromise the safety or suitability of the food.]~~Clean water: water that does not compromise food safety in the circumstances of its use.	**Brazil** Rationale: For harmonization use definition of CAC 53/2003.
[Clean water - water that does not contain physical, biological or chemical contaminants at a level that would compromise the safety or suitability of the food.]	**Senegal**
~~[~~ **Clean water:** water that does not contain biological, physical or chemical contaminants at a level that would compromise the safety or suitability of the food.~~]~~	**Nicaragua** We support including the definition of clean water and recommend incorporating the definition of potable water once it has been finalized by the WHO.
[Clean water - …	**Uruguay** Uruguay understands that it is more appropriate to use the definition of 'Clean Water' from the Code of Hygienic Practice for Fresh Fruits and Vegetables (CXC 53-2003) and not introduce a new definition, with a view to keeping the documents streamlined. Uruguay also finds it necessary to add the definition for 'Potable Water' from that document.
[~~**Clean**~~**Potable****water -**…	**Colombia** Colombia asserts that the term should be potable water. We await the WHO definition, as mentioned in the note on p. 18 in the English version.
[**Clean water** – water that does not contain ~~biological~~ biological, physical or chemical contaminants at a level that would compromise the safety or suitability of the food.]	**AU** African Union recommends addition of "physical contaminants" as part of the hazards. Physical contaminants can also compromise the safety and suitability of clean water.
[**Clean water** – …	**IDF** The general approach is that any water used should be suitable and safety for its intended use. The concept of "clean water" is dedicated to fresh and salty water with a quality as found in the nature (i.e. un-treated). The need of definitions of water(s) will depend on the wording developed on supply and use of water (currently paragraphs 77-82). See our comments on waters later in this document, which suggest definitions for drinking water, water of potable quality and reclaimed water as well as a modified definition of clean water
Control (verb): To take all necessary actions to ensure and maintain compliance with established criteria and procedures.~~–~~ **Food suitability:** assurance that food is acceptable for human	**Nicaragua** Nicaragua proposes including the definitions on Food Suitability and Food Safety, as they are referenced throughout the text.

consumption according to its intended use **Food safety:** assurance that food will not cause harm to the consumer when it is prepared and/or eaten according to its intended use.	
Control measure: Any action or activity (i.e. control measures at CCP and some GHPs which need a higher level of control) that can be used to prevent or eliminate a significant food safety hazard or reduce it to an acceptable level.	**Japan** For clarification. Japan understands that "control measure" includes HACCP control measures and some GHPs which need a higher level of control (i.e. so-called "enhanced-GHP").
Critical Control Point (CCP): A step at which a control measure essential for a significant hazard can be applied to prevent or eliminate a food safety hazard or reduce it to an acceptable level in a HACCP plan.	**Panama** Panama proposes adding the word "essential," as follows: Critical Control Point (CCP): An essential step at which a control measure for a significant hazard can be applied to prevent or eliminate a food safety hazard or reduce it to an acceptable level in a HACCP plan.
Food hygiene system: The combination of hygiene practices, including those that require additional attention (i.e. control measures at CCP and some GHPs which need a higher level of control) and that, when taken as a whole, ensures that food is safe and suitable for its intended use.	**Japan** For clarification.
Food hygiene system: The combination of hygiene ~~practices, including those that require additional attention and that,~~ practices when taken as a whole, ensures that food is safe and suitable for its intended use.	**Switzerland**
Hazard: …A biological, chemical or physical agent in [, or condition of,] food with the potential to cause an adverse health effect.	**USA** We do not object to deletion of "[, or condition of,]" in the definition of hazard. Rationale: The "condition of" in the definition relates to things such as whether food designed for children could cause a choking hazard. However, most solid foods can present a choking hazard if not properly chewed, and in practice the hazard analyses conducted by industry focus on severity and likelihood of occurrence. A firm designing food specifically for children may control size to minimize the potential for a choking hazard, but it may not include this in a HACCP plan. If the phrase is deleted, the definition of hazard in the Procedural Manual will need to be changed and the last sentence in paragraph 155 would need to be deleted.
Hazard: A biological, chemical or physical agent ~~in [,~~ in ~~or condition of,]~~ of food with the potential to cause an adverse health effect.	**India** Square brackets need to be removed, as there would be some condition of food when it may pose health hazard. Like, hot tea, sharp edges of hard boiled condition and Swallowing of thick viscous liquids can cause choking e.g a thick sticky syrup that's difficult to gulp; Psyllium husk if dissolved in less water makes a thick gelatinous / sticky consistency mix which is difficult to swallow
Hazard: A biological, chemical or physical agent in ~~[, or condition of,]~~ food with the potential to cause an adverse health effect.	**Japan** If the Committee agrees with the deletion of "or condition of", we should consider the proposal of the amendment of the "hazard" definition in the Codex Procedural Manual when needed, in accordance with the Guide to the Procedure for the Amendment and Revision of Codex Standards and Related Texts
Hazard: A biological, chemical or physical agent ~~in [,~~ in ~~or condition of,]~~, food with the potential to cause an adverse health	**Kenya** we agree to the inclusion of condition

effect.	
Hazard: A biological, chemical or physical agent ~~in [or condition of]~~ present in food and with the potential to cause an adverse health effect.	**Senegal**
Hazard: A biological, chemical or physical agent ~~in [or~~ or condition ~~of]~~ of food with the potential to cause an adverse health effect.	**Morocco**
Hazard: A biological, chemical or physical agent in ~~[, or condition of,]~~ food with the potential to cause an adverse health effect.	**AU** African Union recommends the deletion of the term "or condition of" from the definition of hazards. The term "condition of" is not easily understandable. Moreover, in the current application of HACCP, the term "condition of food" is hardly used in hazard analysis process. It is also difficult to provide a control measure for "condition of food" as a hazard.
Hazard: A biological, chemical or physical agent in ~~[, or condition of,]~~ food with the potential to cause an adverse health effect.	**IDF** The phrase "condition of" is very unclear, and has led to various experts referring to it in very different meanings, e.g. suitability, the food itself being an allergen (e.g. milk), scalding by hot liquids, etc. The most suitable example is the size/shape of a grape constitutes that constitute a risk of choking, and that situation is adequately covered in paragraph 155 of the draft document.
Hazard analysis: The process of collecting and evaluating information on hazards identified in the environment, in the process or in the food, and conditions leading to their presence to decide which are significant for food safety and therefore should be ~~addressed in~~ managed by the HACCP plan.	**IDF**
Monitor: The act of conducting a planned sequence of observations or measurements of control parameters to assess whether a CCP or a relevant GHP procedure is under control.	**Japan** For consistency with the description of "Monitoring" in the comparison table.
Monitor: The act of conducting a planned sequence of observations or measurements of control parameters to assess whether a ~~CCP or a GHP procedure is under control.~~ control measure operates as intended.	**Safe Supply of Affordable Food Everywhere** Monitoring: The act of conducting a planned sequence of observations or measurements of control parameters to assess whether a CCP or a GHP procedure is under control control measure operates as intended.
Prerequisite programme: programmes that provide the basic environmental and operating conditions necessary for the production of safe and suitable food and that set the foundation for implementation of a HACCP system.	**Switzerland** Is this the ISO Definition?
[Review of hazards: …….?]	**USA** We suggest to delete this proposed term, which has not yet been defined. We do not think a definition is needed. If the term is used, it can be described in the text.
[Review of hazards: …….?] **Review of operation:** It is necessary to define clearly, explaining the difference of this term to "review of hazards".	**Brazil** It is necessary to define clearly, explaining the difference of the term "review of hazards" to "hazard analysis".
[Review of hazards: ~~……~~The process of collecting and reviewing available information on the hazards associated with the environment, process and food to design the application of GHPs including those that require additional attention so as to manage the food hazards.~~?~~]	**India** The definition is proposed to address the GHP based plan

[Review of hazards: .....?]	**Japan** Japan does not support the creation of a new term "review of hazards".
[Review of hazards: .....?~~]~~ A review of hazards is the activity of detecting suitability, adequacy, effectiveness, and efficiency of achieving the objective of addressing the source or situation with a potential to cause injury and ill health.	**Guyana** The following text is a proposed definition.
[Review of hazards: .....?]	**Kenya** Hazards will remain the same even considering the conditions and therefore no need for review of hazards categories
~~**[Review of hazards**: .....?]~~	**AU** African Union recommends to delete the term "Review of hazards". Review of hazards is part of an effective HACCP
[Review of hazards: .....?]	**IDF** The term is new and unclear. It is not specifically addressed by the current draft but mentioned a few places. As currently written is implies that the term refers to an inferior hazard analysis. If a simplified hazard analysis is to be included, terms already used in hazard analysis should be used (*e.g. hazard identification Anyway, the way of conducting a simpler approach by small FBOs needs much more consideration.
~~**[Review of hazards**: ¿.....?]~~	**Nicaragua** Hazard review is not addressed in the document; it is, therefore, not appropriate to include its definition.
[Review of hazards: ¿.....?]	**Uruguay** This should be defined if the term is to be used in the document.
~~**[Review of hazards**: .....?]~~	**Colombia** This term is only referenced in the table for Question 1, such that if the table is moved to the appendix, including its definition is unnecessary.
~~**[Review of hazards[**~~: .....?]	**Costa Rica**
Significant hazard: a hazard of such a nature, based on severity of adverse health effects and likelihood of occurrence in the absence of control, that its elimination or reduction to acceptable levels is essential to the production of a safe food. ~~a hazard identified through a review of hazards or a comprehensive hazard analysis, as reasonably likely to occur in the absence of control~~	**USA** We suggest a new definition since, as written, it does not capture severity. The suggested definition is based on the discussion of the hazard analysis in CXC 1-1969 and captures both severity and likelihood of occurrence. It avoids defining the term based on the process used to reach the conclusion that the hazard is significant (a review of hazards or a comprehensive hazard analysis).
Significant hazard: a hazard identified through a review of hazards or a comprehensive hazard analysis, as reasonably likely to occur in the absence of control measures, not to be prevented by general GHPs.	**Japan** For clarification.
Significant hazard: a hazard identified through a ~~review of hazards~~ hazard identification or a comprehensive hazard analysis, as reasonably likely to occur in unacceptable levels in the end products in the absence of control	**IDF** 1. See our comments above to [Review of hazards: .....?] 2. Many hazards may occur, but not all need to be controlled. Further, the focus of control should relate to the levels in end products. Therefore, inserting “in unacceptable levels in the end

	product" as follows, will clarify the meaning of "significance":
~~Significant hazard:~~ ~~a hazard identified through a review of hazards or a comprehensive hazard analysis, as reasonably likely to occur in the absence of control~~ Significant hazard: a hazard identified through a review of hazards or a comprehensive hazard analysis, as reasonably likely to occur in the absence of control and causes illness or death.	**Safe Supply of Affordable Food Everywhere** Why is nothing about severity included in the definition of a Significant Hazard?
Step: A point, procedure, operation or stage in the food chain including raw materials, which can be from primary production to final consumption.	**USA** Rationale:Provides flexibility in that not all steps need to be considered by every food business
Validation: Obtaining evidence that a ~~GHP or a~~ control measure or combination of GHPs and/or control measures, if properly implemented, are capable of controlling hazards to a specified outcome.	**USA** Rationale: This retains the definition in the Codex guidelines on validation. GHPs would be control measures if they are controlling hazards, so there is no reason to specifically mention GHP in the definition.
Validation: Obtaining evidence ~~that~~ that a ~~GHP or a~~ control measure or combination of ~~GHPs and/or~~ control measures, if properly implemented, are capable of controlling hazards to a specified outcome.	**Japan** For consistency with the description of "Validation of the effectiveness of the measure" in the comparison table. Validation should be carried out for HACCP control measures and some GHPs which need a higher level of control (i.e. control measures).
Validation: …	**IDF** We highly recommend that the definition of validation as stated in CODEX GL applies. The draft definition is confusing. Co-existence of the definition in GL 69 and a new definition in this document would re-introduce unclarity. The definition in GL69 is as follows: Validation: Obtaining evidence that a control measure or combination of control measures, if properly implemented, is capable of controlling the hazard to a specified outcome
~~**Validation:** Obtaining evidence that a GHP or a control measure or combination of GHPs and/or control measures, if properly implemented, are capable of controlling hazards to a specified outcome.~~Validation: Obtaining evidence that a control measure or combination of control measures, if properly implemented, are capable of controlling hazards to a specified outcome.	**Safe Supply of Affordable Food Everywhere**
Verification: The application of methods, procedures, tests and other evaluations, in addition to monitoring to determine whether a GHP or a control measure or combination of GHPs and/or control measures is or has been operating as intended.	**Switzerland** use same text as in "Validation
[CHATER ONE] GOOD HYGIENE PRACTICES	
~~*[CHAPTER ONE]*~~ *CHAPTER ONE*	**Nicaragua**
As previously noted, in certain circumstances a review of the operation and its hazards ~~(or a comprehensive hazard analysis)~~ may indicate that …	**Chile** Eliminate text under parenthesis, since it is inserting a new type of hazard analysis and should need a definition for what actions are included in a comprehensive hazard analysis and it is not included in the hazard analysis without adjective
As previously noted, in certain circumstances a review of the operation and its hazards (or a comprehensive hazard analysis) may indicate that GHPs alone are sufficient to manage the hazards	**USA** Rationale: Reduce repetition of what has been said before. Additional changes may be needed here depending on how we approach the issue of "review of hazards/hazard analysis."

associated with a food business. For some GHPs ~~a higher level of control~~ more attention may be needed (e.g. with increased monitoring and verification) may be needed to provide safe and suitable food~~, and thus the level of control and the frequency of monitoring and verification will need to be applied appropriately. For example, the cleaning of equipment and surfaces which come in contact with food may warrant a greater level of control and frequency of monitoring than, say, the cleaning of walls and ceilings~~.	
As previously noted, in certain circumstances a review of the operation and its hazards (or a comprehensive hazard analysis) may indicate that…	**Safe Supply of Affordable Food Everywhere** There is no mention of validation for GHPs that need a higher level of control. GHPs that need a higher level of control should be validated when possible.
As previously noted, in certain circumstances a review of the operation and its hazards (or a comprehensive hazard analysis) ~~may~~ indicates that GHPs alone ~~are~~ may be sufficient to manage the hazards associated with a food business… alimentaria….	**Nicaragua** Nicaragua proposes these changes to the wording to avoid misinterpretations of this paragraph.
Knowledge of the food and its production process is essential for the effective implementation of GHPs. This ~~[chapter]~~ chapter provides guidance for effective implementation of GHPs, including appropriate location, layout, design, construction and maintenance of premises and facilities, and should be applied in conjunction with sector and product-specific codes.	**Nicaragua**
GHPs manage many sources of food hazards which could contaminate food products,…	**Canada** We believe the examples (e.g. persons who handle food etc.) are potential sources of hazards and not food hazards per se.
All businesses should ~~review operations~~ be able to understand and be aware of hazards associated with their businesses, and the control measures required to manage these hazards, as appropriate. Operations and potential hazards may be reviewed to determine whether the application of GHPs, including those that require additional attention, is sufficient to manage some or all of the food hazards associated with the operation through control of their sources e.g.	**Thailand** From the concern that the term 'review of hazard' used in the Draft might implies that the written formal review is required, we would like to propose the amendment in para 23 as specified.
All businesses should ~~review their operations and~~ understand the GHPs associated with their process activities, such that ~~any possible~~ hazards ~~to determine whether the application of GHPs, including those require additional attention, is sufficient~~ linked to these activities are controlled, ~~to manage some or all of the food hazards associated with the operation through control of their sources.~~ e.g.	**Uruguay**
All businesses should review operations and potential hazards to determine whether the application of GHPs,…	**Uruguay** As noted on previous occasions, Uruguay asserts that if the term "review" is introduced, the implications for businesses must be clear, such that "review" should be defined under "Definitions."
~~Control of water quality – minimises the presence of many potential hazards (biological, chemical)~~	**Brazil** Rationale: Delete the examples if there is no reason to leave only these four control points. Only

	these controls are esentials?
~~Control of faecal contamination – minimises the potential for contamination with many foodborne pathogens such as *Salmonella, Campylobacter, Yersinia*, pathogenic *E. coli;*~~	**Brazil** Rationale: Delete the examples if there is no reason to leave only these four control points. Only these controls are esentials?
Control of faecal contamination – minimises the potential for contamination with many foodborne pathogens such as Salmonella, Campylobacter, Yersinia, ~~pathogenic~~ pathogenic strains of *E. coli;*	**Canada**
~~Control of food handler practices and hygiene – prevents many potential communicable diseases that could be foodborne; and~~	**Brazil** Rationale: Delete the examples if there is no reason to leave only these four control points. Only these controls are esentials?
Control of cleaning of food contact surfaces – removes bacterial contaminants, including foodborne pathogens,and allergens. [Translator's note: the suggested change in the French version does not have an impact on the English version.]	**Canada**
Control of sources of hazards under GHP is often preventative in nature, practical, feasible and cost effective for the FBO.	**IDF/FIL** Not only GHPs, but also the entire approach to HACCP is preventive in nature
Control of ~~sources of~~ food hazards under GHPs is ~~often~~ preventable, ~~preventative in nature, practical~~ feasible and cost effectivefor the FBO.	**Uruguay** This sentence is unclear. We suggest the following wording.
Food safety hazards that occur or are present at such levels that GHP procedures are not sufficient to… In the case that ~~sufficient control measures through GHPs~~ significant food safety hazards are ~~not possible~~identified through hazard analysis even after the implementation of GHP,…	**Japan** For clarification.
Food safety hazards that occur or are present at such levels that GHP procedures are not sufficient to… In the case that sufficient control measures ~~through GHPs~~ are not possible, it will be necessary to implement a HACCP plan. Such a plan may necessitate changes in processing parameters, in processing steps, in manufacturing technology, in end product characteristics, in method of distribution or in the intended ~~use.~~ use or in the GHPs applied.	**IDF** In the 5th line, remove "through GHP" to avoid conflict with ISO 22000. Further, moving from a GHP-based system to a GHP/HACCP-based system is most likely to impact the required GHPs - additional GHPs may be needed, whereas others may have become superfluous. It is therefore appropriate to reflect that in the last sentence.
Food safety hazards that occur or are present at such levels that GHP…	**Panama** Panama suggests deleting the word "such" to make the wording make more sense: "Food safety hazards that occur or are present at levels that GHP procedures are not sufficient…"
PRIMARY PRODUCTION	
SECTION 1: PRIMARY PRODUCTION	**USA** Add "Section 1" before "Primary Production." Renumber subsequent sections. Rationale: It is unclear why this does not have a section number.
SECTION 0: PRIMARY PRODUCTION	**Switzerland** why not number "Primary production"?
PRIMARY PRODUCTION	**Uruguay**

	Good practices in Primary Production are not found only to this section, rather throughout the document, there are practices and activities that also apply to this step in the chain.
– **a. A**voiding the use of areas where the environment poses a threat to the safety of food (e.g. contamination sites);	**Costa Rica**
– controlling contaminants, pests and diseases of animals and plants to the extent practicable, so as to minimise the threat to food safety (e.g. appropriate use of pesticides and veterinary drugs);	**Canada** Suggest adding another example.
– b. **C**ontrolling contaminants, pests and diseases of animals and plants to the extent practicable, so as to minimise the threat to food safety (e.g. appropriate use of veterinary drugs)	**Costa Rica**
– adopting practices and measures to ensure food is produced under appropriately hygienic ~~conditions~~conditions (e.g. hygienic milking practices).	**Switzerland**
– **c. A**dopting practices and measures to ensure food is produced under appropriately hygienic conditions.	**Costa Rica**
~~**Environmental Hygiene**~~ "**Environmental control**"	**Costa Rica**
Potential sources of contamination from the environment should be considered... e.g. using land with high heavy metal ~~contaminants~~ contaminants, near facilities emitting toxic or offensive odours or sources of contaminated water.	**Jamaica**
Potential sources of contamination from the environment should be considered…e.g. using land with high heavy metal contaminants or sources of contaminated ~~water~~water unless there is a measure to reduce or prevent the contamination to food.	**Thailand** Some harmful substances contaminated in the environment may be able to reduce or prevent.
Potential sources of contamination from the environment should be considered… e.g. ~~using land with high heavy metal contaminants or~~ sources of contaminated water, runoff, faecal materials.	**Japan** Japan proposes to add more general examples of contamination from environment. If the phrase "using land with high heavy metal contaminants" is remained, the Code of Practice concerning source-directed measures to reduce contamination of food with chemicals (CXC 49-2001) should be referred here since it is helpful for users to understand the document.
Q2:	**Chile** Question 2: Q2: Are there any FAO/WHO programs which can be referenced here? We prefer not to make reference to FAO / WHO program here, since it would be part of the document and we don´t know what would it happen if this FAO / WHO document it is updated and without the MS consensus.
Q2:	**FoodDrinkEurope** FAO have some publications on biosecurity at primary production which could perhaps be quoted e.g. http://www.fao.org/docrep/pdf/010/a1140e/a1140e03.pdf
Q2:	**USA** Recommendation: We do not see a need to reference any FAO/WHO programs here.
Q2: FAO have some publications on Good Agricultural Practices which could perhaps be quoted e.g. http://www.fao.org/docrep/006/Y5224E/y5224e04.htm#TopOfPage	**India** Reference proposed is more relevant for this section.

Q2:	**Guyana** Propose the use of the World Health Organisation - Five Keys to Safer Food Programme.
Q2:	**Safe Supply of Affordable Food Everywhere** FAO Guide to Dairy Farming Practices
Q2: Are there any FAO/WHO programmes which can be referenced here?	**Peru** There are currently no references to any FAO/WHO programs.
Q2:	**Uruguay** Although there are FAO documents that could support this section, we need to assess how to reference them without necessarily including them in a Codex document, given the implications for international trade.
Q2:	**Argentina** No observations
The potential effects of primary production activities on the safety and suitability of food should be considered at all times. In particular, this includes identifying any specific points in such activities where a high probability of contamination may exist and taking specific measures to minimize and if possible eliminate that probability.	**Jamaica**
control plant and animal health so that it does not pose a threat to human health through food consumption, or adversely affect the suitability of the product (e.g., observe the withdrawal period ~~and grace period~~ of veterinary drugs and pesticides, respectively, keeping records where applicable).	**AU** African Union suggests to delete grace period since "Withdrawal period" is the standard terminology used.
control plant and animal health so that it does not pose a threat to human health through food consumption, or adversely affect the suitability of the product (e.g., observe the withdrawal period and ~~grace~~ withdrawal period of veterinary drugs and pesticides, respectively, keeping records where applicable).	**Senegal**
In particular, care should be taken to manage waste, and store harmful substances appropriately. ~~On-farm~~ Production programmes such as industry quality assurance prograes which achieve specific food safety goals are becoming an important part of primary production and should be encouraged.	**USA** Rationale: To clarify that "on-farm" programs at primary production include industry quality assurance programs.
sort food and food ingredients to remove material which ~~is evidently unfit~~ **may not be used** for human consumption;	**Costa Rica**
SECTION 1: ESTABLISHMENT DESIGN AND FACILITIES	
SECTION 1: ESTABLISHMENT DESIGN AND FACILITIES **RATIONALE: ATTENTION TO GOOD HYGIENIC DESIGN AND CONSTRUCTION, APPROPRIATE LOCATION, AND THE PROVISION OF ADEQUATE FACILITIES IS NECESSARY TO ENABLE HAZARDS TO BE EFFECTIVELY CONTROLLED"**	**India** This would cover biological, physical, chemical/&allergens and contaminants which we aim to control through establishment design and facilities.
SECTION 1: ESTABLISHMENT ~~DESIGN~~ DESIGN, FACILITIES	**Switzerland**

AND ~~FACILITIES~~EQUIPMENT	
Food Establishments should not be located where there is a threat to food safety or suitability and hazards cannot be controlled by reasonable measures. The location of a ~~food~~ establishment, including temporary/mobile establishments, should not introduce any hazards from the environment that cannot be controlled. In particular, unless sufficient safeguards are provided, ~~food~~ establishments should normally be located away from:	**Switzerland**
Establishments should not be located where there is a threat to food safety or suitability and hazards cannot be controlled by reasonable measures…	**Nicaragua** **[Change does not apply to the English text]**
Establishments should not be located where there is a threat to food safety or suitability and hazards cannot be controlled by reasonable measures…	**Costa Rica** **[Change does not apply to the English text]**
Landscaping near a food ~~facility~~ establishment should be properly designed to minimise attracting and harbouring pests. Where necessary, experts should be consulted for advice on appropriate plants for use in landscaping.	**Switzerland**
Landscaping near a food facility should be properly designed to minimise attracting and harbouring pests. Where necessary, experts should be consulted for advice on appropriate plants for use ~~in~~ as ~~landscaping.~~needed	**Senegal** Rationale: to avoid repeating “landscaping”
~~Equipment~~	**AU** Deletion is necessary to avoid repeatition.
~~Equipment~~1.1 DESIGN	**Switzerland**
~~Equipment~~	**Nicaragua** This term is not consistent with the content and could lead to confusion.
Equipment	**Costa Rica** **[Change does not apply to the English text]**
Hygienic design and layout of food establishment ~~[and equipment]~~	**Switzerland**
Hygienic design and layout of food establishment ~~[and equipment]~~ .	**Nicaragua** This subheading does not address equipment and the word should, thus, be deleted from the title.
The internal design and layout of food establishments and equipment should permit good hygiene practices, permit adequate maintenance and cleaning, protect from cross-contamination and facilitate, if feasible, a ~~linear~~ consecutive ? flow of operations.	**Switzerland**
The internal design and layout of food establishments and equipment should permit good hygiene practices, permit adequate maintenance and cleaning, protect from cross-contamination and facilitate, if feasible, a linear flow of operations.	**Costa Rica** **[Change does not apply to the English text]**
~~The~~ Areas having different hygiene control e.g. clean and ~~dirty~~ filty areas should be separated to minimize cross-contamination	**India**

through measures such as physical separation (e.g. walls, partitions) and/or location (e.g. distance), traffic flow (e.g. one-directional production flow), airflow, and separation in time, with suitable cleaning and disinfection between uses.	For bringing the clarity.
The clean and dirty areas should be separated to minimize cross-contamination through measures such as physical separation (e.g. walls, partitions)…	**FoodDrinkEurope** □ We would suggest to replace the sentence by the following: Areas having different hygiene control e.g. cooked product and raw materials should be separated…." □ Rationale: The terminology is vague for "clean and dirty areas" and so revised text is proposed to bring clarity.
doors should have smooth, non-absorbent surfaces, be easy to clean and, ~~where necessary~~, disinfect;	**Jamaica**
~~For example, some work~~ Work surfaces that come into direct contact with food should be in sound condition, durable, and easy to clean, maintain and disinfect…	**Canada** We suggest that this be included as an additional bullet in the previous section instead of an example because the proposed recommendations apply to all work surfaces.
~~For example, some~~ work surfaces that come into direct contact with food should be in sound condition, durable, and easy to clean, maintain and disinfect…	**Switzerland** delete "for example" and add as last bullet point to para 34.
For example, some work surfaces that come into direct contact with food should be in sound condition, durable, and easy to clean,… provided such deviation does ~~not result in~~ not compromise food safety~~being compromised~~	**Canada**
Temporary/mobile food establishments ~~and vending machines~~	**Switzerland** proposal to delete as not addressed in the text
Establishments and structures covered here include market stalls, street vending ~~vehicles~~ vehicles, vending machines and temporary premises such as tents and marquees.	**Canada** Suggest including vending machines in the paragraph to align with the title of this section.
Such premises and structures should be located, designed and constructed to avoid, as far as reasonably practicable, the contamination of food and the harbouring of pests. In applying these specific conditions and requirements, ~~any food hygiene~~ any hazards associated with such facilities…	**India** There is no term as food hygiene hazards. Proposed to delete food hygiene.
1.2 **FACILITIES**	**Switzerland**
~~**Water supply**~~	**USA**
Q3: Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here?	**Jamaica** Moving original text from CXC1-1969 to the section on water is appropriate; improves the flow.
Q3:	**Chile** Question 3: Q3: Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here? YES
Q3:	**Egypt** Egypt agrees to move to the section on water with reference to where it is located.

Q3:	**USA** We do not object to the placement in the document of the text on water. Delete the sub-header "Water supply." Rationale: Text on water has been moved.
Q3:	**India** We agree with this since here only we are discussing about the 'design of disposal' and associated risks.
Q3:	**Japan** Japan agrees with the proposal.
Q3:	**Canada** Bring paragraph 75 and 76 to this location, i.e. between paragraph 37 and 38 under the title FACILITIES and sub-title Water Supply. Canada suggests keeping the text on Water Supply at its original location (CXC 1-1969). We believe that if all provisions on water are moved to Section 2: Control of Operation, this leaves a gap in Section 1: Establishment Design and Facilities. The section on Facilities indicates that the following should be provided in the establishment: drainage and waste disposal systems, cleaning facilities, personnel hygiene facilities, facilities for temperature control, air quality and ventilation systems, adequate lighting and facilities for storage of food. We believe that the recommendations on the water supply system fit better in this section (i.e., Section 1: Establishment Design and Facilities) than in Section 2: Control of Operation.
Q3:	**Guyana** Agree that the text fits there.
Q3:	**Safe Supply of Affordable Food Everywhere** YES
Q3:	**Kenya** No, We agree the section on water supply to be moved to the section on water.
Q3: Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here?	**Panama** Panama agrees that the text fits here.
Q3:	**Peru** Yes, we agree.
Q3:	**Uruguay** We agree with moving the original text on water supply to a specific "Water" section.
Q3:	**Argentina** Argentina agrees with moving the original text on water supply to the section on water.
Q3:	**Colombia** The change and placement are appropriate
Q3:	**Costa Rica** Costa Rica proposes leaving it in its original place.
Q3:	**AU** African Union supports the relocation of the text as this is a logical arrangement to consolidate the requirements applicable to water.
Q3:	**FoodDrinkEurope**

	□ We propose that the paragraph "water supply" should be kept in this section. □ Rationale: Water is generally considered as part of utilities, especially as it relates to the availability of potable water for personal hygiene, hand washing, cleaning etc.
Q3:	**IDF/FIL** We support that all provisions addressing water (supply, procurement and use) be addressed in the same section. See also our comments to water (paragraph s 75-82)
Drainage and waste ~~disposal~~disposal facilities	**Switzerland**
Adequate drainage and waste disposal systems and facilities should be… It is important that drainage does not flow from highly contaminated areas (such as toilets or raw production areas) to areas where finished food is exposed to the environment.	**USA** To provide examples of highly contaminated areas.
Adequate drainage and waste disposal systems and facilities should be…	**Mauritius** Potable water term may be used but it remains quite vague. In industry we use terms like 'raw water', 'treated water', 'process water' and 'packaged water' for differentiation. This is for information. We term as 'raw water' that water which is not for direct consumption, and treated water/packaged water, the water which is fit for consumption; the specifications of the types of water differs. Process water are water used at cooling towers, for washing purposes, etc.
Waste should be collected, disposed of by trained personnel and, where appropriate…	**Switzerland** add provision to store waste under appropriate temperature conditions
Containers used to hold hazardous substances prior to disposal should be identified and, where appropriate, be lockable to prevent ~~malicious or accidental~~ the contamination of food.	**Canada** Suggestion to delete. In our view, malicious or accidental is not necessary in this sentence.
Containers used to hold hazardous substances prior to disposal should be identified and, where appropriate, be lockable to prevent malicious or accidental contamination of food. Suitable provision should be made for the removal and storage of waste. Waste should as far as possible be collected and stored in covered containers and should not be allowed to accumulate and overflow in food handling, food storage, and other working areas or the adjoining environment except so far as is unavoidable for the proper functioning of the business. Personnel responsible for waste removal should be properly trained so they do not become a source of cross-contamination.	**Switzerland** add paras 104 and 105
Containers used to hold hazardous substances prior to disposal should be identified and, where appropriate, be lockable to prevent ~~malicious~~ intentional or accidental contamination of food.	**Senegal**
Containers used to hold hazardous substances prior to disposal should be identified and, where appropriate, be lockable to prevent ~~malicious~~ intentional or accidental contamination of food.	**Morocco**
Containers used to hold hazardous substances prior to disposal	**AU**

should be identified and, where appropriate, be lockable to prevent ~~malicious~~ intentional or accidental contamination of food.	The term 'intentional' is the standard term used.
Adequate, suitably designated facilities should be provided for cleaning, utensils and equipment. Such facilities should have an adequate supply of hot and cold potable water. A separate cleaning facility should be provided for tools and equipment from highly contaminated areas like toilets, drainage and waste disposal areas.	**Philippines** We propose the addition of the statement to prevent cross-contamination during cleaning of tools and equipment used for food production.
Adequate, suitably designated facilities should be provided for cleaning, utensils and equipment. Such facilities should have an adequate supply of hot ~~and~~ and/or cold potable water, where required.	**India** Some facilities may not even need hot water, while others like a Wheat flour Mill needs to be kept and maintained dry . Thus "where required" should be introduced at the end of the sentence.
Adequate, suitably designated facilities should be provided for cleaning, utensils and equipment. Such facilities should have an adequate supply of hot and cold potable water.	**IDF** It is common to clean equipment with water that does not meet all the requirements applicable to potable water. All cleaning steps do not require the same quality of water. For instance, reclaimed water from processing of milk is widely used for cleaning and rinsing. Delete the second sentence. The water supply should be addressed in the section on water (see comment above).
~~adequate~~ suitable changing facilities for personnel; and	**India** This makes having a changing facility a requirement that would be applicable to all FBOs. Hence, proposed amendment.
~~where necessary,~~ separate sinks should be available for hand washing and food washing.	**USA** Rationale: When is it not necessary?
where necessary, separate sinks should be available for hand washing and food washing. Access to toilets?	**Switzerland**
Q4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?	**Chile** Question 4: Q4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food? First, this question is unclear about if we need a new paragraph or this pargraph 43 is the subject of question. Since is a section on establishment design, this information is not needed at this point and it is already covered in paragraph 63.
Q4:	**Egypt** Yes, we need.
Q4:	**Mauritius** Q4: Yes, this paragraph is important and to add 'a temperature monitoring frequency of the cooling equipment, based on hazard analyses, should be determined by the operations' – this is because storage temperature control is critical in certain cold processing operations and forms part of their preventive or control measures.
Q4: Yes.	**India** Temperature requirements are different for different for different perishable products and in certain cases CCPS are fixed based on the temperature requirements. Hence, monitoring of temperature is required.

	By introducing separate paragraph on monitoring of temperature reflect that para 52 is relevant.
Q4:	**Canada** Canada does not believe that a paragraph is necessary since it is properly addressed in a subsequent paragraph under section Time and temperature control (paragraph 63).
Q4:	**Guyana** Yes temperature of premises, equipment and food need to be discussed since it plays a critical role in ensuring food safety.
Q4:	**Switzerland** no, addressed in paras 61-63
Q4:	**Kenya** Yes. there is need for a paragraph on monitoring of temperature of premises and equipment.
Q4 : Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?	**Senegal** We do not approve including a paragraph. We recommend, however, modifying paragraph 43
Q4 :	**Morocco** Morocco does not support including an additional paragraph
Q4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?	**Panama** Panama asserts that paragraph 43 is sufficient and an additional paragraph is not necessary.
Q4:	**Peru** It is not necessary to create a paragraph, as this is already cited in paragraphs 43, 51, 52, and 53. However, the monitoring records should be included.
Q4:	**Uruguay** The paragraph on “Temperature control” should be included in the “Control of Operation” section, under the “Time and temperature control” paragraph. We suggest deleting the text relating to monitoring from this section.
Q4:	**Argentina** Argentina does not believe an additional paragraph on temperature monitoring is necessary, as this information is already clearly and comprehensively included in paragraphs 43 and 63.
Q4:	**Colombia** We do not find this additional paragraph to be necessary, given that paragraph 43 already includes the information.
Q4:	**Costa Rica** Paragraph 43 already covers the necessary information.
Q4:	**FoodDrinkEurope** • Suggestion is that no additional detail is needed beyond what is in paragraph 43
Q4:	**IDF** Temperature control should be addressed. However, provision of adequate equipment to monitor temperatures in premises is adequately covered by paragraphs 51-53 and temperature control as control measures is covered the section on “Key aspects of food hygiene system” (paragraphs 61-63).
Q4:	**Safe Supply of Affordable Food Everywhere** FBO should establish risk based temperature monitoring plan.

	NO since this is discussed in #58 and # 63
Depending on the nature of the food operations undertaken, adequate facilities should be available for heating, cooling, cooking, refrigerating and freezing food, for storing refrigerated or frozen foods, ~~monitoring premises, equipment~~ and ~~food temperatures, and~~ when necessary, controlling ambient temperatures to ensure the safety and suitability of food.	**USA** Modify the sentence to delete the text on monitoring. Rationale: Monitoring temperature, while important, does not fit here. This section is on Establishment Design and Facilities, and the paragraph is about having facilities for operations that need temperature control. The actual monitoring of temperatures of premises, equipment and foods belongs in the section on Control of Operations, where it is in fact covered in paragraph 63.
~~Depending on~~ When the ~~nature of the food operations undertaken, adequate facilities should be available~~ temperature is important to ~~for heating, cooling, cooking, refrigerating and freezing food, for storing refrigerated or frozen foods, monitoring~~ ensure the ~~premises, equipment~~ safety and suitability of food, ~~temperatures, and when necessary, controlling ambient~~ temperature ~~to ensure the safety and suitability of food.~~ should be monitored and, where appropriate, recorded	**Senegal**
Depending on the nature of the food operations undertaken, adequate facilities should be available for heating, cooling, cooking, refrigerating and freezing food, for storing refrigerated or frozen foods, monitoring premises, equipment and food temperatures, ~~and when necessary, controlling ambient~~ When the temperature ~~to ensure~~ is important to ensure the safety and ~~suitability~~ quality of food~~.~~, it should be monitored and, where appropriate, recorded	**Morocco** Certain foods need a controlled environment to minimise the growth and multiplication of microorganisms during production.
Depending on the nature of the food operations undertaken, adequate facilities should be available for heating, cooling, cooking, refrigerating and freezing food, for storing refrigerated or frozen foods, controlling or monitoring the temperature of the premises, equipment and food ~~temperatures~~, and when necessary, controlling ambient temperatures to ensure the safety and suitability of food.	**Colombia** “Controlling and maintaining” is a better translation. We also request the reorganized wording proposed here.
Ventilation systems should be designed and constructed so that…	**Canada** Is it clear for which part of the sentence is the example for? We suggest deleting or defining “industry-approved filters”
Ventilation systems should be designed and constructed so that air does not flow from contaminated areas to clean areas; the systems should be easy to maintain and clean ~~and, for example,~~ and use industry-approved filters.	**Switzerland**
~~Where appropriate, food~~ Food storage facilities should be designed and constructed to:	**Brazil** Rationale: Brazil suggests that there should be no flexibility for this requirement.
The type of storage facilities required will depend on the nature of the food. ~~Where necessary~~Separate, ~~separate,~~ secure, storage facilities for cleaning materials and hazardous substances should be provided.	**Brazil** Rationale: Brazil suggests that there should be no flexibility for this requirement.
1.3 EQUIPMENT	**Switzerland**
Equipment and containers coming into contact with food, should be suitable for food contact, designed and constructed and located to	**Canada**

ensure that they can be adequately cleaned (other than containers which are single-use only) and disinfected (where necessary) and maintained to avoid the contamination of food, according to hygienic design principles. Equipment and containers should be made of materials that are non-toxic according to intended use... [Translator's Note: the suggested change in the French version does not have an impact on the English version - "conteneur" and "contenant" are both translated as "container".]	
Equipment used to cook, heat, cool, store or freeze food should be designed to achieve the required food temperatures as rapidly as necessary in the interests of food safety and suitability, and maintain food temperatures effectively. Where appropriate, equipment should be calibrated to ensure that food processes are monitored consistently and accurately.	**Colombia** [Change does not apply to the English text]
SECTION 2: CONTROL OF OPERATION	
SECTION 2: CONTROL OF OPERATION	**FoodDrinkEurope** This section contains elements that fall in the scope of HACCP. These should be moved there if not duplicated. Generally speaking, this section looks like a melting pot. We suggest that GHP-specific elements be moved to the right sections and Management-specific elements be moved to a dedicated 'Management' chapter that could cover 'Training' as well. We then suggest the following outline for the GHP-part: - Section 1: 'Establishment design and facilities' - Section 2: 'Establishment maintenance, sanitation and pest control' - Section 3: 'Personal hygiene' - Section 4: 'Product information and consumer awareness' Chapter 3 (new chapter on top GHP and HACCP): 'Management'
Product description	**Canada** Suggested Wording: To reduce the risk of unsafe food by taking preventive measures to ensure the safety and suitability of food at an appropriate stage in the operation by controlling physical, chemical and microbiological contaminants in food. Suggestion to ensure that all types of contaminants are considered by FBOs.
2.1 PRODUCT / PROCESS DESCRIPTION **Product description**	**Switzerland**
An FBO that is producing or preparing food should provide a description of the food…	**Canada** Paragraphs 54-57: We suggest including text on why product and process description is recommended under this section. Under HACCP, product and process descriptions are meant to facilitate the hazard analysis. In paragraph 4 of Chapter One: Good Hygiene Practices, it mentions that FBOs should undertake a review of potential hazards; therefore we could provide information on why product and process description is useful when FBOs undertake a review of potential hazards.
An FBO that is producing or preparing food should provide a description of the food… ~~Grouping~~ If applied, grouping of food products should be based on having similar inputs and ingredients, product characteristics (such as pH, a_w), process steps and	**IDF**

intended purpose.	
The description ~~should identify~~may include, as appropriate,	**Thailand** We still think that the requirements are too stringent for FBOs who only apply GHP. The text provided in Product description (paragraph 54-56) and Process description (paragraph 57) are more prescriptive than that of the HACCP.
~~The~~ For the other FBOs, the description should identify, as appropriate,	**IDF** Paragraph 55 and 56 are linked together, but this is not clear from the text. For clarity, start paragraph 56 with "For other FBOs,…"
any specific vulnerable consumer groups **that could consume** the product**,** e.g., infants, elderly, immuno-compromised individuals, **pregnant women**;	**Costa Rica**
storage of product (e.g. ~~fresh~~refrigerated/frozen/shelf stable) and transport conditions required; and	**Canada**
food packaging material used. **• Potential incorrect or hazardous use by consumers** **• Consumer information included on the label**	**Costa Rica**
The FBO producing food should consider all steps in the operation for a specific product... The steps should be confirmed as accurate ~~by checking against~~ onsite review of the ~~actual~~ operation or process…	**Canada**
The FBO ~~producing food~~ should consider all steps in the operation for a specific product…	**Switzerland**
The FBO producing food should consider all steps in the operation for a specific product… For example, for restaurants the flow diagram could be based on the general activities from the receipt of ingredients/raw material, storage (~~cold storage~~refrigerated, frozen, room temperature), preparation before use (washing, defrosting), and cooking or preparation of food.	**Canada**
The FBO producing food should consider all steps in the operation for a specific product **and document a flow diagram to reflect this process**. It may be helpful to develop a flow diagram which could also be used for a number of similar products…	**Costa Rica**
The FBO should develop and implement procedures for monitoring ~~GHPs~~ control measures and, as relevant to the business and as applicable to the hazard being controlled, GHPs. Procedures could include defining responsible personnel, methods of monitoring…	**IDF** This section should specify that flow diagram(s) should show the sequence and interaction of all processing steps in the operation, including where raw materials, ingredients and intermediate products enter the flow and where intermediate products, by-products and waste are released or removed. All food safety control measures should be monitored, whereas GHPs only need to be monitored, where relevant.
~~**Corrective actions**~~	**Thailand**
~~The~~ When monitoring results identify a deviation, the FBO should ~~develop~~ undertake corrective action ~~procedures~~ as relevant to the	**Thailand** In paragraphs 58-60, three procedures are mentioned i.e. monitoring procedure, corrective action

~~business that are implemented when a deviation is identified~~business. ~~Procedures~~ Corrective action could ~~include~~include the following, as appropriate:	procedure, and verification procedure. This requirements of three procedures are almost the same as detail required in HACCP plan. For GHP, the focus should be on monitoring procedure. The corrective action and verification of GHP should be undertaken under the monitoring procedure.
~~who is responsible for taking action;~~	**Thailand**
immediate action to be taken;	**Costa Rica** **[Change does not apply to the English text]**
~~**Verification of GHP**~~	**Thailand**
The FBO should ~~develop~~ undertake verification ~~procedures~~ as relevant to the business, which ensure that GHP procedures have been implemented effectively, monitoring is occurring and that appropriate corrective actions are taken when requirements are not met. ~~Procedures~~ Details could ~~include~~include the following, as appropriate:	**Thailand** In paragraphs 58-60, three procedures are mentioned i.e. monitoring procedure, corrective action procedure, and verification procedure. This requirements of three procedures are almost the same as detail required in HACCP plan. For GHP, the focus should be on monitoring procedure. The corrective action and verification of GHP should be undertaken under the monitoring procedure.
~~who is responsible for conducting the activity;~~	**Thailand**
review of GHP procedures, monitoring, corrective actions and records;	**Costa Rica** **[Change does not apply to the English text]**
review when any changes occur to the product, process and other operations associated with the business; and	**Costa Rica** **[Change does not apply to the English text]**
2.2 KEY ASPECTS OF FOOD HYGIENE SYSTEMS	**Switzerland**
Such systems should also specify tolerable limits for time and temperature variations. Temperature control systems that impact safety and suitability of food should be monitored, and as appropriate, recorded…	**USA** Rationale: To be explicit about recording temperatures when needed.
Such systems should also specify tolerable limits for time and temperature variations… Temperature monitoring and recording devices should be checked for accuracy and calibrated at regular intervals or as needed.	**Philippines** We propose the addition of “at regular intervals or” to demonstrate availability of calibration plan.
~~61. Many~~ The specific processing steps, as described in various Codes of Hygienic Practice for specific foods, contribute to the production of safe and suitable food products, ~~including~~therefore, ~~for example:~~these specific processing steps should be applied.	**Brazil** Rationale: To give greater clarity to the paragraph.
~~61.~~ Many specific processing steps, as described in various Codes of Hygienic Practice for specific foods, contribute to the production of safe and suitable food products, including, for example:	**Switzerland**
Many specific processing steps, as described in various Codes of Hygienic Practice for specific foods, contribute to the production of safe and suitable food products, including, for example:	**Costa Rica** Costa Rica submits that it is important to analyze the objective of including this information.
~~cooking,~~ ~~chilling,~~ ~~drying, and~~ ~~packaging.~~	**Brazil**

The composition of a food, e.g. formulation by adding preservatives,… systems should be in place to ensure that the product is formulated correctly., and in compliance with regulatory requirements.	**India** The formulation control could be considered as GHP requiring special attention for ensuring food safety and regulatory compliance. Hence, it is proposed need to include and in compliance with regulatory requirements for better understanding
Where microbiological, chemical or physical specifications are used in the control of food safety or suitability, such specifications should be based on… ~~FBOs should consider that when the initial overall contamination level in raw material is low (e.g. 10^3 cfu/g), the required degree of heat treatment (in this case, for example, 5 log reduction) is also low.~~	**Brazil** Rationale: The example is very prescriptive and unnecessary.
Where microbiological, chemical or physical specifications are used in the control of food safety or suitability, such specifications should be based on…	**Canada** The relevance of the last sentence in the paragraph is not clear and could be improved or deleted. It seems too technical for this chapter.
Where microbiological, chemical or physical specifications are used in the control of food safety or suitability, such specifications should be based on sound scientific principles... FBOs should consider that when the initial overall contamination level in raw material is low ~~(e.g. 10(^{3} CFU/g),~~ the required degree of heat ~~treatment (in this case, for example, 5 log reduction)~~ treatment is also low.	**Senegal** Rationale we recommend deleting the reference because it depends on the type of microorganism. We therefore do not recommend including it in the document.
Systems should be in place to prevent or minimise contamination of foods by MICROORGANISMS. Microbiological cross-contamination occurs through a number of mechanisms, including the transfer of microorganisms from one food to another, …	**Switzerland** use the same wording as in 70 and 71.
In some food operations, access to processing areas may need to be restricted or controlled for food safety purposes. For example, where risks are high, access to processing areas should be ~~only~~ via a properly designed changing facility…	**USA** Rationale: The term makes the provision too restrictive.
In some food operations, access to processing areas may need to be restricted or controlled for food safety purposes. For example, where ~~risks are~~ the likelihood of contamination is high, access to processing areas should be only via a properly designed changing facility…	**IDF/FIL** In paragraph 69, 2nd sentence, it is not clear which risks are referred to. We prefer the term "likelihood" and recommend qualifying it by adding "of contamination".
Systems should be in place to prevent or minimise contamination of foods by harmful chemicals, e.g. cleaning materials, non-food grade lubricants, chemical residues from pesticides and from veterinary drugs such as antibiotics and anthelmintic etc… Systems should be in place to prevent or minimise contamination of foods by harmful chemicals, e.g. cleaning materials, non-food grade lubricants, chemical residues from veterinary drugs such as antibiotics and ~~anthelmintic~~vermifuge etc.	**Canada**
Allergenic ~~Cross-contact~~	**Philippines** We propose to change the title to Allergen Management to be consistent with Code of Practice on Food Allergen Management for Food Business Operators
Allergenic Cross-contact	**FoodDrinkEurope**

	□ We would suggest here to change the title to “Allergenic by nature and cross-contact”
Note: Placeholder to reference allergen guidance.	**Uruguay** Agree with this inclusion.
Note: Placeholder to reference allergen guidance	**IDF/FIL** The document would benefit by clearly addressing allergens as hazards. They can be addressed as physical (or chemical) hazards. Otherwise, the definition of hazard might be changed to include allergens as a separate group of hazards.
Systems ~~Hazard identification~~ should be in place to take into account the allergenic nature of some foods…	**Switzerland** "hazard identification" is used here for the first time, but will be explained later on ...
Hazard identification should take into account the allergenic nature of some foods. Presence of allergens e.g. ~~nuts~~ tree nuts, leche, ~~eggs~~ eggs, crustacea, fish, peanuts, soybeans and wheat and other cereals containing gluten and their derivatives (not an inclusive list; allergens of concern differ among countries)…	**Colombia** Colombia proposes including in this paragraph the 8 allergenic food groups listed in the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) and the Proposed Draft Code of Practice on Food Allergen Management for Food Business Operators (Step 3).
Only raw materials and other ingredients that are fit for purpose should be used. Incoming materials including food ingredients… ~~Incoming raw~~ Raw materials or other ingredients should, where appropriate, be inspected...	**Senegal**
Note: EWG has amended the Original text from CXC 1–1969 in paras 51 to 58…	**Japan** Japan supports this idea.
Note: EWG has amended the Original text from CXC 1–1969 in paras 51 to 58…	**Safe Supply of Affordable Food Everywhere** Comment for the second Note. The term Potable Water is understood, BUT it is not clear on how it is proven the water used is potable such as testing the water for certain items both microbiological and chemical. This should include information on the minimums required to show the water used is potable such as Coliform and HTC testing and heavy metals testing.
Note the Co-Chairs understand that the definition of water is currently under revision by WHO. Is ‘potable’ better understood by most people as this seems to be the term used in the regulations of several countries, but is there a more appropriate term?	**Brazil** Brazil is unaware of a more appropriate term and agrees with the use of “potable water” as a synonym for "drinking water”.
Note the Co-Chairs understand that the definition of water.. Keep “potable” to facilitate common understanding.	**India**
Note the Co-Chairs understand that the definition of water..	**Japan** Japan supports using the term "potable".
Note the Co-Chairs understand that the definition of water..	**Guyana** In Guyana the word 'treated' is used and better understood. Even though the word 'potable' may be used in some documents it is not always understood by everyone, but the word 'treated' is interpreted as 'the water is safe for drinking.
Note the Co-Chairs understand that the definition of water is currently under revision by WHO. Is ‘potable’ better understood by most people as this seems to be the term used in the regulations of several countries, but is there a more appropriate term?	**Peru** We are waiting on the WHO to issue a statement on the most appropriate term.
Note the Co-Chairs understand that the definition of water…	**Uruguay** Similar to the document Fresh Fruits and Vegetables (CXC 53-2003), it would be useful for this

	document to include the definitions for “Clean Water” and “Portable Water.”
Note the Co-Chairs understand that the definition of water…	**Costa Rica** Costa Rica supports the use of the term "potable water."
Note the Co-Chairs understand that the definition of water..	**IDF/FIL** We agree that the approach to water should be updated to reflect current practices in the industry. Saving water resources is highly encouraged by the UN sustainability goals and the public interest in reducing food waste. In particular, the dairy industry has taken the lead in developing methodologies and approaches for claiming and purifying various water streams relevant to dairy processing. Water consumption by the dairy industry is traditionally very high (up to 2 kg water per kg of food) as well is the amount of water disposed of as waste water. 85% of the milk is water (“milk water” – often referred to as “cow water”), which can be reclaimed by a combination of normal processing and filtration. Experience show that up to 60% of the water supply can be replaced by milk water, depending on the type of production and size (to justify the investment in equipment). So, the supply of water to many dairy plants is a mixture of potable water (drinking water) from public supplies or private wells and reclaimed milk water supplied through milk. Although milk water looks like water, it does not meet all the chemical (WHO) requirements of drinking water. As the residual substance is food, such milk water is nevertheless potable. Further, the microbiological challenges are different in milk water compared with drinking water, which makes microbiological criteria for drinking water redundant. There is a great need to address water supplies that are alternative to traditional supplies, and to address the hygiene aspects involved. IDF does not consider the term “clean water” as being adequate to cover waters reclaimed from food processing. The concept of “clean water” was originally introduced to cover the use of untreated sea water and fresh water for certain uses (e.g. cleaning fish on fishing boats). There is a need to maintain that understanding of “clean water”. We need a more nuanced approach by introducing new terms to supplement potable and clean waters, respectively. We suggest that the term “potable water” be replaced by “drinking water”, as this is the term used by the WHO. Such a change would make room for the use of the term “potable” to address other waters – not intended for drinking - that are safe and suitable for consumption (potable). The following definitions are offered for further consideration by CCFH members: Drinking water - water that is safe to drink and which meets the requirements as specified in the latest edition of WHO Guidelines for Drinking Water Quality, or water of a higher standard [Water of potable quality/Potable water] - water that is safe to use in food processing and which meet the food safety related requirements specified in the latest edition of WHO Guidelines for Drinking Water Quality, or water of a higher standard. Reclaimed water – water that was originally a constituent of a food or was first used in food processing, and which has been removed from these sources by one or more processing steps, and is intended to be subsequently used in food processing or as an ingredient in food Clean water –seawater and fresh water that is safe and suitable to use without further treatment during harvesting, fishing or hunting animals or producing primary products The comments below have been reflected as to the individual paragraphs suggesteds amendments in relevant paragraphs that would meet the above needs.
Note the Co-Chairs understand that the definition of water…	**FoodDrinkEurope** Our suggestion would be to keep “potable” to facilitate common understanding

An adequate supply of potable water and/or clean water with appropriate facilities for its storage, distribution and temperature control,… Potable water should meet the requirements as specified in the latest edition of WHO Guidelines for Drinking Water Quality, or ~~water~~ national standard established in line with the latest edition of ~~a higher standard~~WHO Guidelines for Drinking Water Quality.	**Thailand** Flexibility should be given to the FBOs that follows the national competent authority.
An adequate supply of potable water and/or clean water with appropriate facilities for its storage, distribution and temperature control,… Potable water should meet the requirements as specified in the latest edition of WHO Guidelines for Drinking Water Quality, or ~~water of a higher standard.~~ as prescribed in the national regulations.	**India** National standards for potable water can also be considered for meeting requirement as it would be difficult for some countries to implement the guidelines for water higher than WHO.
An adequate supply of ~~potable~~ drinking water ~~and/or clean water~~ with appropriate facilities for its storage, distribution and temperature control, should be available whenever necessary to ensure the safety and suitability of food. ~~Potable~~ Drinking water should meet the requirements as specified in the latest edition of WHO Guidelines for Drinking Water Quality, or water of a higher standard. 75bis.Reclaimed water, including water claimed from food, should be safe and suitable for its intended use. The safety and suitability of the reclaiming processes and intended usage should be documented by the FBO. 75bisbis. Clean water may substitute drinking water, where appropriate, if adequate facilities and procedures are in place to ensure that its use is not a source of food contamination	**IDF/FIL** To accommodate for the types of water, as defined above, IDF recommend the following provisions relating to the supply of water.
An adequate supply of potable water ~~and/or clean water~~ with appropriate facilities for its storage, distribution and temperature control,…	**Peru** Strike the term clean water because it does not have an objective definition and could cause confusion. ALTERNATIVE Strike the term clean water because its definition is limited to biological and chemical contaminants.
~~Non-potable~~ Other water (for technical use in, for example, fire control, steam production, refrigeration and other similar purposes where it would not contaminate food), should have a separate system. ~~Non-potable~~ Such water systems need to be clearly identified and should not connect with, or allow backflow into, potable and/or clean water systems~~.~~	**IDF/FIL**
Non-potable water (for use in, for example, fire control...Non-potable water systems need to be clearly identified and should not connect with, or allow backflow into, potable ~~and/or clean~~ water systems.	**Peru** Strike the term clean water because it does not have an objective definition and could cause confusion. ALTERNATIVE Strike the term clean water because its definition is limited to biological and chemical contaminants.
Non-potable water (for use in, for example, fire control...Non-potable water systems need to be clearly identified and should not	**Colombia**

connect with, or allow backflow into, potable and/or clean water systems.	[Change does not apply to the English text]
The quality of water used ~~in primary production~~ should be suitable for its intended purpose. For ~~additional~~ information on water for primary production see relevant codex texts[4].	**IDF/FIL** This principle should apply to all waters, not only to water in primary production.
Only potable water should be used in food handling and processing, except in certain food processes, e.g. chilling, and in food handling areas, where this does not constitute a hazard to the safety and suitability of food (e.g. the use of clean ~~sea~~ water, ~~or clean~~ including sea water or recirculated water).	**USA** Rationale:The term “clean water” can encompass both sea water and recirculated water.
Only potable water should be used in food handling and processing, except in certain food ~~processes, e.g. chilling, and in food handling areas,~~ processes where this does not constitute a hazard to the safety and suitability of food (e.g. the use of clean sea water, or clean water or recirculated water).	**Brazil** Rationale: Brazil suggests the withdrawal of examples, since in some processes/food chilling must necessarily be used with potable water.
Only potable water should be used in food handling and processing, except in certain food ~~processes, e.g. chilling,~~ processes and in food handling areas, where this does not constitute a hazard to the safety and suitability of food (e.g. the use of clean sea ~~water~~water for chilling, or clean water or recirculated water).	**Switzerland**
~~Only potable water should be~~ Water used in food handling and ~~processing, except in certain food processes, e.g. chilling, and in food handling areas, where this does~~ processing should not constitute a hazard to the safety and suitability of food (e.g. the use of clean ~~sea~~ water, ~~or clean~~ reclaimed water, potable water or recirculated water).	**IDF** The paragraph needs a full rewording to cover current practices.
Recirculated water which has received no further treatment and water recovered from processing of food by evaporation or drying may be used, provided ~~its use~~ it is approved by the health authority and does not constitute a risk to the safety and suitability of food.	**Peru**
Water recirculated for reuse or reclaimed water should be treated and maintained in such a condition that no risk to the safety and suitability of food results from its ~~use (i.e~~use. ~~recirculated water should be “clean water”).~~ The treatment process should be effectively monitored. Recirculated water which has received no further treatment and reclaimed water recovered from processing of food by ~~evaporation~~ evaporation, flitration, or drying may be used, provided its use does not constitute a risk to the safety and suitability of food.	**IDF** Reclaimed water should include should be addressed as well
Potable water should be used to avoid food contamination. The potable water may be treated where this is required by the production process. The treatment process should be effectively monitored.	**Switzerland**

Drinking water, Potable water and water reclaimed from the same type of food from which it has been reclaimed should be ~~used~~ used, whenever necessary, to avoid food contamination. The ~~potable~~ water ~~may~~ should be treated where this is required ~~by the production process.~~ to maintain safety and suitability	**IDF** Reclaimed water can be added to the same type of food that it originates from. For instance, it is suitable and safe to add "milk water" to milk products. Further, all water should be treated if necessary for safety and suitability reasons.
Ice in direct contact with food should be made from water that is fit for purpose e.g. ~~clean~~ potable water for Ready to serve beverages orclean sea water for fish~~, or potable water. In cases where it is used to refrigerate whole fishery products, ice can be made with clean water.~~ Ice should be produced, handled and stored so it is protected from contamination.	**India** We proposed to give example of use of potable ice like it may be used in case of Ready to serve beverages. Further, the second sentence only provides the explanation of the example given above. Hence, proposed to be deleted this sentence.
Ice in direct contact with food should be made from water that is fit for purpose e.g. ~~clean sea water~~ for fish, or potable water. In cases where it is used to refrigerate whole fishery products, ice can be made with clean water. Ice should be produced, handled and stored so it is protected from contamination.	**Peru** The term clean sea water has not been defined by Codex.
Ice in direct contact with food should be made from water that is fit for purpose ~~e.g. clean sea water for fish, or potable water.~~ In cases where it is used to refrigerate whole fishery products, ice can be made with clean water. Ice should be produced, handled and stored so it is protected from contamination.	**IDF/FIL** Paragraph 81 should also address other types of safe and suitable waters.
~~**MANAGEMENT AND SUPERVISION**~~	**Canada** This heading should have been deleted after the original text under it was moved to other sections.
2.3 MANAGEMENT AND SUPERVISION	**Switzerland**
Documentation and Records	**Switzerland** should we move paras 58-60 to section 2.3?
Managers should ensure effective procedures are in place to respond to any deviation from GHPs…	**Switzerland** paras 84 and 85 somehow contradict the table in the introduction where it says that for GHPs there are usually no corrective actions needed when Deviation is indicated
Managers should ensure effective procedures are in place to respond to any deviation from GHPs. Failure to apply the controls effectively should be assessed for the impact on food safety or suitability. Procedures should enable the comprehensive, rapid and effective withdrawal of any food from the market that may pose a ~~hazard~~ risk to public health. Where a product has been recalled because of the likely presence of hazards that may represent an immediate health ~~hazard~~risk, …	**IDF** The use of the terms "hazard" and "risk" in the 3rd sentence of paragraph 84 should be corrected,
Provision should be made so recalled products can be held under secure conditions until they are destroyed, used for purposes other than human consumption, determined to be safe for human consumption, or reprocessed in a manner to reduce the ~~hazard~~hazard to acceptable levels.	**IDF** The reference to "reduce hazard" in paragraph 85 is not clear. Clarify by adding "to acceptable levels"
SECTION 3: ESTABLISHMENT [CLEANLINESS] [SANITATION], MAINTENANCE AND PEST CONTROL	
SECTION 3: ESTABLISHMENT ~~[CLEANLINESS]~~	**USA**

~~[SANITATION]~~CLEANING, MAINTENANCE AND PEST CONTROL	We do not support the use of "cleanliness" in place of "sanitation." We recommend that the title be "Establishment Cleaning, Maintenance, and Pest Control" and that the text use "cleaning, and disinfection" or "cleaning and, where appropriate, disinfection" as appropriate to the text. Rationale: Sanitation has been in the GPFH for many years. However, it now appears that some countries have concerns due to translation issues. We do not agree that "cleanliness" is an appropriate substitute for "sanitation;" "cleanliness" is the result of a sanitation process. ("Cleanliness is appropriately used in the second bullet of the Objectives.) We can avoid the term "sanitation" if we use "cleaning and disinfection" instead.
SECTION 3: ESTABLISHMENT ~~[CLEANLINESS] [SANITATION]~~CLEANLINESS, DISINFECTION MAINTENANCE AND PEST CONTROL	**India** We would suggest to include 'disinfection' in place of 'sanitation', as Sanitation would include both cleaning followed by disinfection, which is also mentioned under 5th bullet of the objective: monitor effectiveness of sanitation (cleaning and disinfection),….. Hence, it is proposed to use the following title: "Establishment Cleanliness, disinfection, Maintenance and Pest control"
SECTION 3: ESTABLISHMENT [CLEANLINESS] [SANITATION], MAINTENANCE AND PEST CONTROL	**Safe Supply of Affordable Food Everywhere** Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be used within the text. Propose using the word cleaning and sanitation versus cleanliness or sanitation. The FBO should determine level of cleaning and sanitation required based on regulatory requirements, product composition, distribution and shelf-life
SECTION 3: ESTABLISHMENT: ~~[CLEANLINESS] [SANITATION], MAINTENANCE~~ CLEANING-DISINFECTION AND PEST CONTROL	**Senegal**
SECTION 3: ESTABLISHMENT: [CLEANLINESS], ~~[SANITATION],~~ MAINTENANCE AND PEST CONTROL	**Morocco** easy to understand and makes the meaning less ambiguous.
SECTION 3: ESTABLISHMENT ~~[CLEANLINESS]~~ CLEANLINESS, ~~[SANITATION]~~ SANITATION, MAINTENANCE AND PEST CONTROL	**Nicaragua** We support the proposal as we find that it provides clarity to the subheading; we propose explaining the concepts of the terms.
SECTION 3: ESTABLISHMENT [CLEANLINESS], [SANITATION], MAINTENANCE AND PEST CONTROL	**Costa Rica** Costa Rica supports using the term 'sanitation', as it includes cleanliness and disinfection.
SECTION 3: ESTABLISHMENT [CLEANLINESS] [SANITATION], MAINTENANCE AND PEST CONTROL	**Safe Supply of Affordable Food Everywhere** Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be used within the text. Propose using the word cleaning and sanitation versus cleanliness or sanitation. The FBO should determine level of cleaning and sanitation required based on regulatory requirements, product composition, distribution and shelf-life
Q5: Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If	**Chile** Question 5: Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be

it is, it can be used within the text.	used within the text. Since in Spanish sanitization means " sanitizacion" and is related to other aspect than food safety, like pest iradication, we propose the terms cleaning and disinfection should be used along the document together or separately according to the text and purpose.
Q5:	**Egypt** The word "Sanitation" is preferred and more comprehensive than the word 'Cleanliness'.
Q5:	**Canada** Canada would support including a definition for Sanitation.
Q5:	**Mauritius** Q5: Cleaning & sanitation should both be used as applicable to the outcome sought. Definitions of cleaning & sanitation should be included as people often confuse both as meaning the same- See below definitions: Cleaning - Cleaning is the washing of equipment and pipelines, or other surfaces to remove residual product and unwanted material. The chemical and physical action between the material and detergent loosens the unwanted material from the surface, so that it can be swept away by the flow of the detergent solution or physical action of a water rinse. Sanitising - Sanitizing is the treatment of clean surfaces and equipment by a process that destroy all pathogenic bacteria and substantially reduces the population of all other microorganisms.
Q5:	**Japan** Japan supports using the word "sanitation". It is clear that the word "sanitation" means cleaning and disinfection (refer to OBJECTIVES in the box), therefore, the definition of "sanitation" is not necessary.
Q5:	**IDF/FIL** The terminology used for cleaning operations vary by country and/or sector but generally "cleanliness" is taken to be visibly clean, where as "sanitation" is taken to be "clean and disinfected".
Q5:	**Guyana** The word 'Sanitation' should be used as well as be defined in order to avoid confusion during translation and for clear understanding of the process involved. The word 'Cleanliness' is not acceptable due to the fact that it doesn't have the same meaning as 'Sanitation'. Cleanliness is used as an understanding that it is the state or quality of being clean or being kept clean but at the expense of sight and not the unseen harmful organisms that may be present and unseen. Sanitation on the other hand specifically addresses the unseen pathogens after the cleanliness process is completed.
Q5:	**Safe Supply of Affordable Food Everywhere** FOBs use cleaning and sanitizing as both mean different things so there are different actions and goals for each item. Recommendation: Whatever is used needs to be defined. Also, not everything is cleaned and sanitized some things are simply cleaned as no chemicals are allowed to be used. My vote is to use Cleaning and Sanitization as two separate actions with both defined, explained, and included. Question: Why is Disinfection or some form of this word used throughout the document instead of Sanitization? Observación: Disinfection has a different definition than Sanitization and FOBs typically perform sanitization as hospitals typically perform disinfections. Solution is to be consistent with one term and define these terms so it is translated correctly and understood.

Q5:	**Kenya** sanitation needs to be maintained but defined.
Q5: Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be used within the text.	**Panama** Panama asserts that the term CLEANING AND DISINFECTION should be used instead of sanitation, as mentioned in paragraphs 94 and 95.
Q5:	**Peru** Peru calls for keeping the term sanitation instead of cleanliness.
Q5:	**Uruguay** Uruguay suggests replacing the term 'sanitation' with 'cleanliness and disinfection'. Review the document to see if both apply or just one for each case.
Q5:	**Argentina** Argentina agrees with using 'Cleanliness and Disinfection' to replace 'Sanitation', as the latter appears to have different meanings in different countries. Therefore, the title for Section 3 should reflect this and would be worded as follows: "Establishment cleanliness and disinfection, maintenance and pest control." Additionally, the document should be revised to define when it is appropriate to use the terms 'cleanliness and disinfection' or when they should be used separately.
Q5:	**Colombia** The term 'cleanliness' is acceptable provided that it is used along with 'disinfection'. The word sanitation includes activities related to cleanliness and disinfection, pest control and waste management. The text should use cleanliness and disinfection.
Q5:	**FoodDrinkEurope** • Cleaning is very different from sanitation, we would suggest to include both cleaning and sanitation in the definitions as separate definitions. ISO documents and many others explain the difference. • In title, we would suggest to use the following title: "Cleanliness and Sanitory conditions, Maintenance and Pest control"
Q5:	**Safe Supply of Affordable Food Everywhere** FOBs use cleaning and sanitizing as both mean different things so there are different actions and goals for each item. Recommendation: Whatever is used needs to be defined. Also, not everything is cleaned and sanitized some things are simply cleaned as no chemicals are allowed to be used. My vote is to use Cleaning and Sanitization as two separate actions with both defined, explained, and included. Question: Why is Disinfection or some form of this word used throughout the document instead of Sanitization? Comment: Disinfection has a different definition than Sanitization and FOBs typically perform sanitization as hospitals typically perform disinfections. Solution is to be consistent with one term and define these terms so it is translated correctly and understood.
~~**3.1 MAINTENANCE AND CLEANING**~~ - monitor effectiveness of cleaning and disinfection, pest control and waste management procedures.	**USA** Rationale: Avoids use of the term "sanitation."

3.1 ~~MAINTENANCE AND CLEANING~~CLEANING AND MAINTENANCE	**Safe Supply of Affordable Food Everywhere** The order of the words need to be switch so this matches the title of the section's order. 3.1 MAINTENANCE AND CLEANING to Cleaning and Maintenance
Establishments and equipment should be maintained in an appropriate condition to:	**Switzerland** are These provisions enough for "maintenance"?
Establishments and equipment should be maintained in an appropriate condition to:	**Colombia** [Change does not apply to the English text]
facilitate all cleaning and sanitation procedures;	**USA**
prevent contamination of food, such as from pests, metal shards, flaking plaster, debris, chemicals, wood, plastic, paper etc.	**Canada** Suggestion was to include awareness for wood and plastic pallets and containers (e.g., bins/totes, liners).
Cleaning should remove food residues and ~~soil~~ dirt which may be a source of contamination, including allergens...	**Canada** Suggest reverting to the original text, as the term "soil" seems too specific and not relevant to many food operations.
Cleaning equipment should be stored in a proper place ~~way~~ to prevent contamination. Cleaning equipment should be maintained and replaced periodically so as not to become a source for cross-contamination of surfaces or food.	**Peru**
~~Sanitation~~ Cleaning and Disinfection methods and procedures	**USA** Editorial. Avoids use of the term "sanitation."
~~Sanitation~~Cleaning and disinfection methods and procedures	**Morocco**
Cleaning and disifection ~~sanitation~~ methods and procedures	**Uruguay**
Cleaning can be carried out by the separate or the combined use of physical methods, such as heat, scrubbing, turbulent ~~flow~~ flow, and vacuum cleaning or other methods that avoid the use of water,…	**USA** Rationale: We think the intent is to refer to vacuum cleaning as a method that avoids use of water and not all the physical methods listed.
Cleaning can be carried out by the separate or the combined use of physical methods, such as heat, detergents, scrubbing, turbulent flow and vacuum cleaning or other methods that avoid the use of water, and chemical methods using solutions of ~~detergents,~~ alkalis or acids…	**Brazil** Rationale: Amendment to make the paragraph more rational, since detergents are part of the physical methods of removing soil.
removing gross visible debris from surfaces;	**Peru** **[Change does not apply to the English text]**
where necessary, cleaning should be followed by chemical disinfection with subsequent rinsing unless the manufacturer's instructions indicate that, on a scientific basis, rinsing is not required. Concentrations and application time of chemicals used for disinfection should be appropriate for use and applied according to manufacturers' instructions.	**Peru** **[Change does not apply to the English text]**
Cleaning and disinfection procedures should ensure that all parts of the establishment are appropriately clean. Where appropriate, programmes should be drawn up in consultation with relevant	**Peru** **[Change does not apply to the English text]**

experts.	
Where written cleaning and disinfection procedures and programmes are used, they should specify:	**Peru**
~~Monitoring Effectiveness~~Monitoring of Effectiveness	**Senegal**
Application of cleaning and disinfection procedures should be monitored for effectiveness and periodically verified by means such as visual inspections and audits to ensure they are applied. properly. The type of monitoring of ~~sanitation~~ cleaning and disinfection programmes will depend on the nature of the procedures, but could include pH, water temperature, conductivity, cleaning agent concentration, disinfectant concentration, and other parameters important to ensuring the programme is being implemented as designed.	**USA** Avoids use of the term “sanitation.
Application of cleaning and disinfection procedures should be monitored for effectiveness and periodically verified by means such as visual inspections and audits to ensure they are applied. properly. The type of monitoring of ~~sanitation~~cleaning and disinfection programmes will depend on the nature of the procedures, but could include pH, water temperature, conductivity, cleaning agent concentration, disinfectant concentration, and other parameters important to ensuring the programme is being implemented as designed.	**Morocco**
Application of cleaning and disinfection procedures should be monitored for effectiveness and periodically verified by means such as visual inspections and audits to ensure they ~~are~~ have been applied properly. The type of monitoring of sanitation programmes will depend on the nature of the procedures, but could include pH, water temperature, conductivity, cleaning agent concentration, disinfectant concentration, and other parameters important to ensuring the programme is being implemented as designed.	**Peru**
Microorganisms can develop resistance to disinfectant agents and the food production environment can change over time, so periodic review with disinfectant suppliers ~~will~~ should be conducted to help ensure the disinfectants used are effective and appropriate.	**USA**
Microorganisms can develop resistance to disinfectant agents and the food production environment can change over time, so periodic review with disinfectant suppliers will help ensure the disinfectants used are effective and appropriate. **Rotating the disinfectants should be considered to prevent microorganisms from developing resistance.**	**Costa Rica** **[Change does not apply to the English text]**
While effectiveness of cleaning and disinfectant agents and instructions for use… or microbiological testing for indicator organisms such as *Listeria* species or for pathogens) can help verify that ~~sanitation~~ cleaning and disinfection programmes are effective and being applied properly. Microbiological sampling and	**USA**

testing may not be appropriate in all cases and an alternative approach might include observation of ~~sanitation~~ cleaning and disinfection procedures to make sure protocols are being followed. ~~Sanitation~~ Cleaning and disinfection and maintenance procedures should be regularly reviewed and adapted to reflect any changes in circumstances and documented as appropriate.	
While effectiveness of cleaning and disinfectant agents and instructions for use…, or microbiological testing for indicator organisms ~~such as *Listeria* species~~ or for pathogens) can help verify that sanitation programmes…	**Thailand** Different indicator organisms are used in microbiological testing. The specification of Listeria species may be viewed as too limited since it is related mainly to ready-to-eat food.
While effectiveness of cleaning and disinfectant agents and instructions for use…	**IDF** It is stated that effectiveness of cleaning can be verified by testing for Listeria. In our experience, it is more efficient to test for Listeria on surfaces before cleaning. This will then not be a direct verification of cleaning, but a monitoring of the general contamination load of Listeria in the processing environment.
While effectiveness of cleaning and disinfectant agents and instructions for use will be validated by their manufacturers,... protein, and allergen test swabs, or microbiological testing for indicator organisms such as ~~Listeria species~~ *Listeria spp.* or for pathogens) can help verify that sanitation programmes are effective and being applied properly….	**Canada**
While effectiveness of cleaning and disinfectant agents and instructions for use will be validated by their manufacturers... indicator organisms such as Listeria species or for pathogens) can help verify that ~~sanitation~~cleaning and disinfection programmes are effective and being applied properly. Microbiological sampling and testing may not be appropriate in all cases and an alternative approach might include observation of sanitation procedures to make sure protocols are being followed. ~~Sanitation~~Cleaning and disinfection and maintenance procedures should be regularly reviewed and adapted to reflect any changes in circumstances and documented as appropriate.	**Morocco**
While effectiveness of cleaning and disinfectant agents and instructions for use ~~will be~~ are validated by their manufacturers, *measures should be taken for* sampling and testing the environment and food contact surfaces… ~~can~~ to help	**Peru**
Pests (e.g. birds, rodents, insects etc.) pose a major threat to… the safety and suitability of food. Pest infestations can occur Good building design, layout and location, ~~sanitation~~cleaning, inspection of incoming materials and good monitoring can minimize the likelihood of infestation and thereby limit the need for pesticides.	**USA** Rationale: Avoids use of the term “sanitation.” Here “cleaning” can be used without “disinfection.”
~~Preventing access~~ Prevention	**India** The heading should be reworded as ‘Prevention’. Because “Prevention” is one of the step under Pest Control System.
~~Building~~ Establishments should be kept in good repair and	**Peru**

condition to prevent pest access and to eliminate potential breeding sites…	
The availability of food and water encourages pest harbourage and infestation…Areas both inside and outside food premises should be kept clean and free of ~~spillages~~ waste. ...	**Peru**
Establishments and surrounding areas should be regularly examined for evidence of infestation… Even if monitoring and detection are outsourced,…	**Peru** **[Change does not apply to the English text]**
~~Prevention~~ Suppression and Eradication	**India** Heading 'Prevention' should be replaced with 'Eradication' as it is more applicable to indoor pest controls.
Pest infestations should be addressed immediately by a competent person or company and conducted without adversely affecting food safety or suitability. Treatment with chemical, physical or biological agents should be carried out without posing a threat to the safety or suitability of ~~food~~food or environment. The cause of infestation should be identified and corrective action taken to prevent a recurrent problem. Records should be kept of infestation, monitoring and eradication.	**FoodDrinkEurope** □ We would suggest to modify the sentence as followed: "Treatment with chemical, physical or biological agents should be carried out without posing a threat to the safety or suitability of food or environment"
Pest infestations should be addressed immediately by a ~~competent~~ qualified person or company and conducted without adversely affecting food safety or suitability…	**USA** Rationale: Avoid confusion with competent authority.
Pest infestations should be addressed immediately by a competent person or company and conducted without adversely affecting food safety or suitability… The cause of infestation should be identified and corrective action taken to prevent a recurrent problem. Records should be kept of infestation, monitoring and eradication. ~~Records~~ 103 bis. Secondary pest control should be ~~kept of infestation, monitoring and eradication~~encouraged like pest repellant plants in boundaries (e.g; Basil, Marigold, Lemongrass etc)	**India** Para for secondary pest control is proposed here. These are also practiced in some of the industry.
Suitable provision should be made for the removal and storage of waste...	**Brazil** Rationale: We suggest to further develop the exception, as this may invalidate the command.
Suitable provision should be made for the removal and storage of waste...	**Switzerland** proposal to move paras 104 and 105 to section 1.2
Waste storage areas should be kept appropriately clean and ~~free of pests and~~ be resistant to pest infestation.	**Thailand** To be practical, waste storage area should be kept clean and resistant to pest infestation.
Waste storage areas should be kept appropriately clean and free of pests and be resistant to pest infestation. They should also be located away from processing areas.	**Peru**
SECTION 4: PERSONAL HYGIENE	
SECTION 4: PERSONAL HYGIENE	**Peru**

	Change text to: To ensure that those who are food handlers
Food businesses should establish polices and procedures for personal hygiene. FBOs should ensure all personnel are aware of the importance of good personal hygiene and understand and comply with controls that need to be applied.	**Peru** **[Change does not apply to the English text]**
People known, or suspected to be suffering from or to be a carrier of ~~a [disease or illness] [communicable disease]~~ an illness likely to be transmitted through food should not be allowed to enter any food handling area if there is a likelihood of their contaminating food. Any person so affected should immediately report illness or symptoms of illness to the management.	**USA** Rationale: Many communicable diseases are not foodborne.
People known, or suspected to be suffering from or to be a carrier of a ~~[disease or illness] [communicable disease]~~ [disease or illness] likely to be transmitted through food should not be allowed to enter any food handling area if there is a likelihood of their contaminating food. Any person so affected should immediately report illness or symptoms of illness to the management.	**Brazil** Rationale: Disease is preferable to communicable disease, as the type of communicable disease is not common for all countries.
People known, or suspected to be suffering from or to be a carrier of a [disease or ~~illness] [communicable disease]~~ illness] likely to be transmitted through food should not be allowed to enter any food handling area if there is a likelihood of their contaminating food. Any person so affected should immediately report illness or symptoms of illness to the management.	**India** Propose to delete communicable disease to avoid duplication
People known, or suspected to be suffering from or to be a carrier of a ~~[disease or illness] [communicable disease]~~ communicable disease should not be allowed to enter any food handling area if there is a likelihood of their contaminating food. Any person so affected should immediately report illness or symptoms of illness to the management.	**Senegal**
People know, or suspected to be suffering from or to be a carrier or a ~~[~~disease or illness~~]~~ [communicable disease] likely to be transmitted through food should not be allowed to enter any food handling area if there is a likelihood of their contaminating the food. Any person so affected should immediately report illness or symptoms of illness to the management.	**Peru**
People known, or suspected to be suffering from or to be a carrier of a communicable ~~[~~disease ~~or illness] [communicable disease]~~ likely to be transmitted through food should not be allowed to enter any food handling area if there is a likelihood of their contaminating food.. Any person so affected should immediately report illness or symptoms of illness to the management.	**Nicaragua**
People known, or suspected to be suffering from or to be a carrier of a [disease or illness] [communicable disease] likely to be transmitted through food should not be allowed to enter any food handling area if there is a likelihood of their contaminating food.	**Costa Rica** Costa Rica supports "of a disease."

Any person so affected should immediately report illness or symptoms of illness to the management.	
It may be appropriate for food handlers to be excluded for a specific time after symptoms resolve or, for some illnesses, to get medical clearance before returning to work. ~~.~~ **Particularly in cases of diarrhea, they should be tested to ensure that they are no longer excreting the pathogen.**	**Costa Rica**
Cuts and wounds, where personnel are permitted to continue working, should be covered by suitable waterproof plasters and hand gloves. Plasters should be of contrasting color compared to the food and detectable using a metal detector or x-ray detector.	**USA** Rationale: Mechanisms to detect plasters that fall into food can be helpful in preventing a choking hazard.
~~Cuts and wounds, where personnel are permitted to continue working, should be covered by suitable waterproof plasters and hand gloves.~~ personnel with wounds and cuts, where they pose the risk of contaminating food and preferably be entrusted activities other than food handling till such time the cuts and wounds are healed	**India** It is proposed to reframe the sentence to minimize any risk of contamination of food.
~~Cuts and wounds, where personnel are permitted to continue working, should be covered by suitable waterproof plasters and hand gloves.~~	**Safe Supply of Affordable Food Everywhere** What if you are cut on your arm or face? Hand gloves would not work for these cuts so need more examples or add "such as" or "for example". What is suitable only waterproof? Need to describe more examples of suitable such as different color than product and metal detectable. Change to: Cuts and wounds, where personnel are permitted to continue working, should be appropriately covered. This coverage could include suitable waterproof plasters, colored bandages, metal detectable bandages, arm covers, hair or bear nets, and hand gloves.
Cuts and wounds, where personnel are permitted to continue working, should be covered by suitable waterproof plasters and hand gloves ~~.~~; they should be assigned to work areas where they will have no direct contact with the food	**Peru**
Food handlers should maintain a high degree of personal cleanliness and, where appropriate, wear suitable protective clothing, head and beard covering, and footwear. Measures should be implemented to prevent cross-contamination by food handlers through adequate hand washing and, where necessary, the wearing of gloves. Gloves should be of contrasting colour compared to the food. If gloves are worn, appropriate measures should be applied to ensure the gloves do not become a source of contamination.	**USA** Rationale: Contrasting color is a mechanism to detect pieces of disposable gloves that fall into food and can be helpful in preventing a choking hazard
To clean the hands, personnel should wash them with soap and water by wetting hands with water and applying sufficient soap to cover all surfaces; rinse hands with clean (preferably potable),… running water and dry them thoroughly with a clean single-use	**Egypt** Personnel should wash hands with soap and water by wetting hands with running water and applying sufficient soap to cover all surfaces. Scrub hands for at least 20 seconds for all hands including the palms, backs, fingers, between your finger, and under your nails. Rinse hands well with clean, running water. Dry thoroughly with a single-use paper towel or an equivalent method that reduces moisture and contamination on hands following washing. The drying method should not aerosolize moisture from hands during the drying process. Multiple-use cloth drying towels

	should not be used. When appropriate, hand sanitizers can be used. Hand sanitizers should not replace hand washing and should be used only after hands have been washed and dried.
~~To clean the hands, personnel~~ Personnel should wash ~~them~~ hands with soap and water by wetting hands with water and applying sufficient soap to cover all surfaces, scrub hands for at least 20 seconds; rinse hands with clean (preferably potable), running water and dry them thoroughly with a clean single-use towel or other method that does not re-contaminate hands. Multiple use cloth drying towels should not be used [If such use cannot be avoided, cloth towels where used should be subject to washing at appropriate frequency~~.~~.] When appropriate, hand sanitizers can be used. Hand sanitizers should not replace hand washing and should be used only after hands have been washed.	**USA** Rationale: Scrubbing hands is important and cloth towels should not be used for drying. We have included in square brackets the text about washing cloth towels when their use cannot be avoided but would prefer that it not be included.
To clean the hands, personnel should wash them with soap and water by wetting hands with water and applying sufficient soap to cover all surfaces; rinse hands with ~~clean (preferably potable)~~clean, running water and dry them thoroughly with a clean single-use towel or other method that does not re-contaminate hands. Multiple use cloth drying towels where used should be subject to washing at appropriate frequency. Hand sanitizers should not replace hand washing and should be used only after hands have been washed.	**Thailand** Clean water is the water that is suitable for the purpose of use so potable might not be necessary.
To clean the hands, personnel should wash them with liquid soap and water ~~by~~ wetting hands with water and applying ~~sufficient~~ soap sufficient to cover all surfaces; rinse hands with ~~clean~~ pure (preferably potable), running water and dry them thoroughly ~~with a~~ using a clean single-use towel or other method that does not re-contaminate ~~hands. Multiple use cloth drying towels where used should be subject to washing at appropriate frequency. Hand sanitizers should not replace hand washing and should be used only after~~ handshave been washed."	**Senegal**
To clean the hands, personnel should wash them with soap and water by wetting hands with water and applying sufficient soap to cover all surfaces; rinse hands with clean (preferably potable), …	**Panama** **[Change does not apply to the English text]**
To clean the hands, personnel should wash them with soap and water by wetting hands with water and applying sufficient soap to cover all surfaces; rinse hands with clean, chlorinated (preferably potable), running water and dry them thoroughly with a clean single-use towel or other method that does not re-contaminate hands. ~~Multiple use cloth drying towels where used should be subject to washing at appropriate frequency.~~ Hand sanitizers should not replace hand washing and should be used only after hands have been washed.	**Peru**
~~To clean the hands, personnel should wash them with soap and water by wetting hands with water and applying sufficient soap to cover all surfaces; rinse hands with clean, chlorinated (preferably potable), running water and dry them thoroughly with a clean~~	**Costa Rica** Costa Rica proposes the following wording: 117 [sic] “Personnel should wash their hands with soap and water by wetting the hands with water and applying sufficient soap to cover all surfaces. Scrub hands together for at least 20 seconds. Rinse hands well with clean running water. Dry them

~~single-use towel or other method that does not re-contaminate hands. Multiple use cloth drying towels where used should be subject to washing at appropriate frequency. Hand sanitizers should not replace hand washing and should be used only after hands have been washed.]~~	thoroughly with a single-use paper towel or other equivalent method that reduces moisture and contamination on the hands following washing. The drying method should not aerosolize moisture from hands during the drying process. Multiple use drying towels should not be used. Where appropriate, hand sanitizers can be used, Hand sanitizers should not replace hand washing and should be used only after hands have been washed and dried." Rationale: Costa Rica asserts that there is evidence that shows that drying with single-use paper towels following adequate washing limits the spread of microbes in facilities and reduces possible pathogens on hands. The physical friction action of a single-use paper towel helps eliminate the bacteria, in addition to absorbing moisture, which leaves the hands drier and prevents transmission and re-contamination.
SECTION 5: TRANSPORTATION	
SECTION 5: TRANSPORTATION	**FoodDrinkEurope** We do not believe that specific section on 'Transportation' is useful and relevant to this document: it should describe GHPs in broad terms irrespective of the food chain sector. Sector-specific codes of practice are or can be developed on top of this document. Elements included in this section 'Transportation' should be moved to other sections of the GHP-part if relevant and not duplicated.
SECTION 5: TRANSPORTATION	**Safe Supply of Affordable Food Everywhere** It is very important when transporting ingredients and products by bulk that the containers and vessels are appropriately washed and dried before loading, not just during transportation. "Food may become contaminated, or may not reach its destination in a suitable condition for consumption, unless effective hygiene practices are taken during transport, even where adequate hygiene practices have been taken earlier in the food chain."
Food should be adequately protected during transport. The type of conveyances or containers required depends on the nature of the food and the conditions under which it has to be transported~~.~~. Food may become contaminated, or may not reach its destination in a suitable condition for consumption, unless effective hygiene practices are taken prior to and during transport, even where adequate hygiene practices have been taken earlier in the food chain.	**Safe Supply of Affordable Food Everywhere**
can be effectively cleaned and, where necessary, ~~disinfected;~~ disinfected and dried	**Safe Supply of Affordable Food Everywhere** Drying of bulk containers is critical for food safety and needs to be included here: • can be effectively cleaned and, where necessary, disinfected;
permit effective separation of different foods or foods from non-food items that could cause contamination, where necessary, during transport;	**Peru**
Conveyances and containers for transporting food should be kept in an appropriate state of cleanliness, repair and condition. Where the same conveyance or container is used for transporting different foods, or non-foods, effective cleaning and, where necessary, disinfection should take place between loads~~.~~. Where the same conveyance or container is used for transporting different foods, or non-foods, effective cleaning, where necessary, disinfection/sanitization, and drying should take place between	**Safe Supply of Affordable Food Everywhere** Drying of bulk containers is critical for food safety and needs to be included in this sentence as well: Where the same conveyance or container is used for transporting different foods, or non-foods, effective cleaning and, where necessary, disinfection should take place between loads.

loads.	
~~Where appropriate, particularly~~ Bulk food in ~~bulk transport~~liquid, ~~containers and conveyances~~ granulated or powder form should be ~~designated and marked~~ transported in receptacles and/or containers/tankers reserved for the transport of food ~~use only and be used only~~ unless the application of principles such as HACCP demonstrates that dedicated transport for these products is not necessary to achieve the ~~purpose~~ same level of ~~transporting foods.~~ food safety	**IDF** The provision on bulk transport is, in practice, unrealistic and unjustified, as for example: Example 1: A truck transporting milk for human use would also be used to transport whey of food grade intended for feed use – the only change would be the 'intention' (which changes its status from food to feed). The wording in paragraph 120 would mean that the truck used for transport of whey can never be used for milk transport again. Example 2: A truck transporting milk is directed to a destruction facility because the milk has been declassified, e.g. because of detection of residues of veterinary drugs. This provision would mean that the truck-driver should also leave the truck at the destruction facility, as it can never be used for food transport again. Transport of other material is acceptable if it does not compromise food safety and if the container is adequately cleaned and, where appropriate, sanitized after any such other use. It will always be possible to clean a container to a level that would make it appropriate for food transportation even though the previous load was not food. For instance, a newly constructed truck is very dirty, but is "upgraded" to food (transport) quality by thorough cleaning before it is put into service for the first time. If the nature of the previous load is known, adequate cleaning can be designated. Use of milk tankers, including collection tankers, for the transport of milk products for animal feeding and other non-food usages (e.g. pharmaceutical or technical usage) will improve transportation logistics, lower transportation costs and be beneficial to the environment (decrease emissions of exhaust gas from trucks). We also refer to the provision in section 5.9 of the CODEX Code of Hygienic Practice for the Transport of Food in Bulk and Semi-Packed Food (CAC/RCP 47-2001), which reads as follows: "Bulk food in liquid, granulated or powder form must be transported in receptacles and/or containers/tankers reserved for the transport of food unless the application of principles such as HACCP demonstrates that dedicated transport for these products is not necessary to achieve the same level of food safety" The wording in para, 120 needs to be amended to address cleaning when bulk transport containers are used for non-food purposes, e.g. either by inserting the same wording as presented in CAC/RCP 47 or a different wording, e.g. as follows:
SECTION 6: PRODUCT INFORMATION AND CONSUMER AWARENESS	
SECTION 6: PRODUCT INFORMATION AND CONSUMER AWARENESS RATIONALE: INSUFFICIENT PRODUCT INFORMATION, AND/OR INADEQUATE KNOWLEDGE OF GENERAL FOOD HYGIENE, CAN LEAD TO PRODUCTS BEING MISHANDLED AT LATER STAGES IN THE FOOD CHAIN. SUCH MISHANDLING CAN RESULT IN ILLNESS, OR PRODUCTS BECOMING UNSUITABLE FOR CONSUMPTION, EVEN WHERE ADEQUATE HYGIENE CONTROL**S** HAVE BEEN TAKEN EARLIER IN THE FOOD CHAIN. INSUFFICIENT PRODUCT INFORMATION ABOUT THE ALLERGENS IN FOOD CAN ALSO RESULT IN ALLERGIC CONSUMERS BECOMING ILL.	**India** Control measures are being used only with reference to HACCP and not for GHP controls/practice. Hence, proposed to delete 'measures'.
Pre-packaged foods should be labelled with clear instructions to	**Canada**

enable the next person in the food chain to handle, prepare, display, store and use the product safely…	Suggest adding “prepare” because handle or use may not cover “prepare”.
Consumer education programmes should cover general food hygiene… Such programmes should enable consumers to understand the importance of any product information and following any instructions accompanying products, and to make informed choices. In particular, consumers should be informed of the relationship between time/temperature control and foodborne illness, and of the presence of allergens. Consumers should also be educated to apply appropriate food hygiene measures (e.g. proper hand washing, adequate storage and cooking and avoiding cross contamination etc.) to ensure that their food is safe and suitable for consumption.	**Canada** Consider adding a sentence indicating who is responsible for Consumer Education programmes (e.g., FBOs and competent authorities).
SECTION 7: TRAINING	
SECTION 7: TRAINING	**Switzerland** proposal to move "training" after section 4
SECTION 7: TRAINING	**Peru** All those engaged in food operations who come directly or indirectly in contact with food should understand food hygiene to ensure competence appropriate to the operations they are to perform.
the expected length of time before consumption.	**Peru** Includes another factor.
the expected length of time before consumption. Use and maintenance of instruments and equipment.	**Peru**
The type of supervision needed will depend on the size of the business, the nature of its activities and the types of food involved. Managers and/or supervisors and/or operators/workers should have the necessary knowledge of food hygiene principles and practices to be able to judge potential hazards and take the necessary action to remedy deficiencies.	**Safe Supply of Affordable Food Everywhere** This is too prescriptive as more than a Manager or Supervisor have knowledge and can take action. Managers and/or supervisors should have the necessary knowledge of food hygiene principles and practices to be able to judge potential hazards and take the necessary action to remedy deficiencies.
Refresher Training	**Peru** **[Change does not apply to the English text]**
CHAPTER TWO: HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM AND GUIDELINES FOR ITS APPLICATION	
HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM AND GUIDELINES FOR ITS APPLICATION	**FoodDrinkEurope** □ We would consider it more appropriate under principle 3 as validation of a predetermined CCP (principle 2) requires that the validation step establishes for example the critical time, temperature, pH, cleaning agent concentration, etc… Principle 6 refers to verification of the whole HACCP system e.g. consumer complaints could be a verification equally as much as analytical tests, therefore putting validation is principle 6 would be confusing.
HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM AND GUIDELINES FOR ITS APPLICATION [TRANSLATOR’S NOTE: THE SUGGESTED CHANGE IN THE FRENCH VERSION DOES NOT HAVE AN IMPACT ON THE ENGLISH VERSION; SENEGAL SUGGESTS CORRECTING THE	**Senegal**

TRANSLATION OF "HAZARD" BECAUSE IT SAYS "RISK" (RISQUE) INSTEAD OF "HAZARD" (DANGER); DANGER IS THE PREFERRED AND CORRECT TERM IN FRENCH.]	
The first part of this [Chapter] sets out the seven principles of the Hazard Analysis and Critical Control Point (HACCP) system. The second part provides general guidance for the application of the system in 12 successive steps while recognizing that the details of application may vary…	**Switzerland** introduce the often used "12 steps"
The first part of this [Chapter] sets out the seven principles of the Hazard Analysis and Critical Control Point (HACCP) system... [Translator's Note: the suggested change in the French version does not have an impact on the English version; Senegal suggests correcting the translation of "hazard" because it says "risk" (risque) instead of "hazard" (danger); danger is the preferred and correct term in French.]	**Senegal**
HACCP principles can be considered throughout the food chain from primary production to final consumption and its implementation should be guided by scientific evidence of risks to human health… HACCP principles can be considered throughout the food chain from primary production to final consumption and its implementation should be guided by scientific evidence of risks to animal and/or human health.	**Safe Supply of Affordable Food Everywhere** Since HACCP is used in primary production and feed, we are also concerned with animal health: HACCP principles can be considered throughout the food chain from primary production to final consumption and its implementation should be guided by scientific evidence of risks to human health.
HACCP principles can be considered throughout the food chain from primary production to final consumption… However, HACCP principles can be applied flexibly in individual operations and businesses may use external resources or adapt a ~~generic~~ HACCP plan that should be regulated ~~provided~~ by the competent authority ~~or food industry~~…	**Peru** An HACCP plan is specific.
HACCP principles can be considered throughout the food chain from primary production to final consumption… However, HACCP principles can be applied flexibly in individual operations ~~and businesses may use external resources or adapt a generic HACCP plan provided by the competent authority or food industry~~…	**Colombia** Colombia proposes striking the text "and businesses may use external resources or adapt a generic HACCP plan provided by the competent authority or food industry..." as the plans are specific to each plant and process.
The successful application of HACCP requires the commitment and involvement of management and the workforce… The application of HACCP is the system of choice in the management of food ~~safety within broader quality management systems.~~ safety.	**India** Deletion of words is proposed as it appears to be redundant.
The successful application of HACCP requires the commitment and involvement of management and the workforce…	**Panama** Panama proposes and recommends using the term 'animal health' instead of 'veterinary health'; we also recommend including other disciples such as: public health, human medicine, epidemiology.
Barriers to the application of HACCP in small and less developed businesses (SLDBs) have been acknowledged and flexible	**Japan** Japan proposes to provide examples for flexible application.

approaches to the implementation of HACCP in such businesses are described in the FAO/WHO Guidance to governments on the application of HACCP in SLDBs[5]. It provides ways to adapt the HACCP approach to assist competent authorities in supporting SLDBs, for example, development of a HACCP-based system which is consistent with the seven principles of HACCP but does not conform to the layout or steps described in this section, e.g. recording only non-compliance monitoring records instead of every monitoring results to reduce unnecessary burden of record keeping for certain types of FBOs.	
Barriers to application of HACCP in small and less developed businesses (SLDBs) have been acknowledged and flexible approaches to the implementation of HACCP in such businesses are described in the FAO/WHO Guidance to governments on the application of HACCP in SLDBs.[5] It provides ways to adapt the HACCP approach to assist competent authorities in supporting SLDBs, for example, development of a HACCP-based system which is consistent with the seven principles of HACCP. ~~but does not conform to the layout or steps described in this section.~~ (*)	**Peru** (*) Wording is confusing, making it difficult to issue an opinion
Q6 Validation has been added to Principle 6 on verification because the application text for Principle 6 included a statement on validation. However, it may be more appropriate to include 'Validation' under Principle 3. What do members think?	**Jamaica** Validation to be included in principle 6
Q6	**Chile** Question 6: Validation has been added to Principle 6 on verification because the application text for Principle 6 included a statement on validation. However, it may be more appropriate to include 'Validation' under Principle 3. What do members think? Validation should be maintained under principle 6, but not be included in the tittle or statement of the principle itself.
Q6	**Egypt** Agree to validation added to Principle 6 on verification and Principle 3 for critical limit.
Q6	**USA** We do not think it would be more appropriate to include validation under Principle 3. Rationale: General. While we agree that it is essential to validate critical limits, validation, as with verification, is much broader. Validation has been considered part of verification for many years. CCFH has previously agreed that we would not create any new principles (e.g., one principle for validation and one for verification), and we decided to provide a better description of the two types of activities within Principle 6. Verification and validation can overlap and some may consider an activity to be validation where others consider the same activity to be verification (e.g., some people consider the reanalysis of the HACCP plan to be a validation activity and others verification). Ultimately, what the activity is called is much less important than that the activity be conducted.
Q6	**Canada** Canada suggests that validation be developed as a concept under principle 6 rather than principle 3 as it applies to more than just the critical limits. Canada supports the new text proposed under Principle 6 and suggests some modifications to the text for Principle 3 in paragraphs 161 and 162.

Q6	**Mauritius** agreed
Q6	**Japan** Japan supports adding the concept of validation to Principle 6. Validation is required for each element in HACCP plan, not only for critical limits.
Q6	**Guyana** Yes, in agreement.
Q6	**Guyana** It is more appropriate to include 'Validation' under Principle 3. The alternate addresses how to identify and ensure that the critical limits identified are sound. Verification alone should remain under Principle 6 as a means of determining system effectiveness.
Q6	**Switzerland** principle 3
Q6	**Kenya** we accept the change as appropriate.
Q6	**Morocco** Morocco supports including validation in HACCP Principle 6. Rationale: Validation is applicable for the entire HACCP system, same as verification.
Q6: Validation has been added to Principle 6 on verification because the application text for Principle 6 included a statement on validation. However, it may be more appropriate to include 'Validation' under Principle 3. What do members think?	**Panama** Panama recommends including validation under Principle 3, as well as keeping it under Principle 6.
Q6:	**Uruguay** Uruguay asserts it would be better to include it in the title for Principle 3, given that establishing the critical limit also requires validation. We suggest the following title for Principle 3: "Establish and validate critical limit(s)." Keep the wording for Principle 3 as it appears in the previous document with the description of the need to validate these critical limits.
Q6:	**Argentina** Argentina agrees with including validation in Principle 6.
Q6:	**Colombia** Colombia does not agree that validation should be included alongside establishing limits. Validation is covered under Principle 6.
Q6:	**Costa Rica** Costa Rica supports the proposal to amend Principle 3.
Q6	**IDF** We highly recommend to separate validation from verification. These two terms are not correctly understood by HACCP users, and confusion will be maintained if they are not kept separate. The correct place to address validation is at the end of the planning phase (when determining the control measures), i.e. as part of Principle 3. That will also be in line with ISO 22000:2018.
Q6	**Safe Supply of Affordable Food Everywhere** Validation should be under principle 3
PRINCIPLE OF THE HACCP SYSTEM	

Conduct a hazard ~~analysis~~analysis and control measures.	**Brazil** Rationale: Brazil suggests including the term “control measures” to give greater clarity to the main activities conducted in Principle 1
Conduct a hazard analysis. [Translator’s Note: the suggested change in the French version does not have an impact on the English version; Senegal suggests correcting the translation of “hazard” because it says “risk” (risque) instead of “hazard” (danger); danger is the preferred and correct term in French.]	**Senegal**
[Establish critical ~~limit(s)] or [Determine and validate critical limit(s)]~~limit(s).	**USA** Rationale: We think that validating critical limits is part of establishing them. This can be explained in the discussion on applying the principle.
[Establish critical limit(s)] ~~or [Determine and validate critical limit(s)].~~	**Brazil** Rationale: Brazil prefers to leave as "establish critical limits”, since the validation process is comprehensive and does not apply only to Principle 3.
~~[Establish critical limit(s)] or~~ [Determine and validate critical limit(s)].	**India** Second is more appropriately worded stressing on the need for Critical limit to be essentially validated.
[Establish critical limit(s)] or [Determine and validate critical limit(s)].	**Malaysia** Malaysia prefers the term “Determine and validate critical limit(s)” Justification: Validation is required under Principle 3 to ensure the control measures and critical limits are capable of controlling hazards. This is also consistent with Malaysian Standard on Food Safety According To Hazard Analysis And Critical Control Point (HACCP) System, where validation should be implemented under the Principle 3.
~~[Establish critical limit(s)] or [Determine~~ Determine and validate critical ~~limit(s)]~~limit(s).	**Malaysia**
[Establish critical limit(s)] ~~or [Determine and validate critical limit(s)].~~	**Senegal**
~~[Establish critical~~ Establish critical ~~limits] or [Determine and validate critical limit(s)].~~ limit(s)	**Morocco** Rationale Validation is applicable throughout the HACCP system, not only when establishing critical limits.
~~[Establish~~ Establish critical límit(s) ~~or [Determine and validate critical limit(s)]~~.	**Nicaragua**
[Establish critical limit(s)] ~~or [Determine and validate critical limit(s)]~~	**Colombia**
Establish the corrective ~~action~~ actions to be taken when monitoring indicates that a particular CCP is not under control.	**USA**
Establish procedures for verification to confirm that the HACCP system is working effectively.	**USA** We can accept the principle as written or we can accept “Establish validation and verification procedures” (as written above paragraph 170). Rationale: Both the statements capture that the principle includes validation. Although the first statement does not explicitly include the term “validation;” validation is necessary for the HACCP system to be effective in controlling hazards.
Establish ~~procedures for~~ validation and verification procedures to confirm that the HACCP system is working effectively.	**Canada** To reflect the new text included in paragraph 170.

Establish procedures for verification and validation to confirm that the HACCP system is working effectively.	**India** Validation is not restricted to critical Limits alone. The control measures and the HACCP system as a whole needs to be validated. Validation is for effectiveness. Thus having it at Principle 6 is more appropriate. Validation is also done while developing the system, after implementation too, while verification is done only after implementation. Hence, proposed changes.
Establish procedures for validation, verification and review to confirm that the HACCP system is working effectively.	**Japan** For consistency with the content of paras 170-175.
~~Establish procedures for verification to confirm that the HACCP system is working effectively~~ Establish procedures for validation and verification"	**Senegal**
GUIDELINES FOR THE APPLICATION OF THE HACCP SYSTEM	
Prior to application of HACCP to any sector of the food chain,… HACCP application will not be effective without prior implementation of ~~GHPs~~PRPs.	**Brazil** Rationale: To give harmony to the paragraph, since PRPs do not only include GHP.
Prior to application of HACCP to any sector of the food chain,… that sector should have in place GHPs in accordance with Chapter I of this document, the appropriate product and sector-specific Codex Codes of Practice, and appropriate food safety requirements set by competent authorities…	**Switzerland** 2nd sentence: Yet another Definition for PRP ...
Prior to application of HACCP to any sector of the food chain, that sector should have in place GHPs…	**Nicaragua** Nicaragua suggests specifying to which program requirements this refers.
For all types of food businesses, management awareness and commitment to food safety are necessary for implementation of an effective HACCP system. The effectiveness will also rely upon management and employees having the appropriate HACCP commitment, knowledge and skills.	**Switzerland**
During hazard identification, evaluation, and subsequent operations in designing and applying HACCP systems, consideration should be given to the impact of raw materials and other ingredients, food production practices, food manufacturing practices (including ~~whether processes control~~ whether hazards are adequately controlled under GHP or whether significant hazards remain and require control under HACCP), likely end-use of the product, categories of consumers of concern, and epidemiological evidence relative to food safety.	**Japan**
HACCP is a systematic approach that enhances control of specific food safety hazards, where necessary, over that achieved by the GHPs that have been applied by the establishment. The intent of the HACCP system is to focus control at Critical Control Points (CCPs). Redesign of the operation should be considered if a ~~[food safety]~~ hazard is identified which is not controlled by the process. As described in the GHP Section, some food hazards may be	**USA** Rationale: The term is not needed, given the definition of a hazard.

controlled adequately by GHP-based controls.	
The HACCP system should be reviewed ~~periodically and~~ periodically, as well as when there is a significant change in the food business that could impact the hazard analysis or control measures (e.g. new process, new ingredient, new product, new equipment) to determine if modifications are ~~needed when~~ needed. When any modification is made in the product, process, or any step~~. Amendments~~ , amendments should be ~~made~~made to the HACCP, as appropriate. The system should also be reviewed, and modified as appropriate, when the HACCP system has failed to produce a safe product, e.g., a pathogen is detected in a ready-to-eat product.	**USA**
The HACCP system should be reviewed periodically and when there is a significant change in the food business that could impact the hazard analysis or control measures… (The system should also be reviewed, and modified as appropriate, when the HACCP system has failed to produce a safe product, e.g., a pathogen is detected at an unacceptable level in a ready-to-eat product.	**Japan**
The HACCP system should be reviewed periodically and when there is a significant change in the food business that could impact the hazard analysis or control…The system should also be reviewed, and modified as appropriate, when the HACCP system has failed to produce a safe product, e.g., a pathogen is detected in a ready-to-eat product. Furthermore, changes should be reported to the competent authorities for validation.	**Peru**
The application of the HACCP principles to develop an effective HACCP system should be the responsibility of each individual business… While it is recognized that flexibility appropriate to the business is important when applying HACCP, all seven principles should be ~~applied~~ considered in developing the HACCP system. This flexibility should take into account the nature ~~[and size]~~ of the operation, including the human and financial resources, infrastructure, processes, knowledge and practical constraints, as well as the risk associated with the produced food. The flexibility is not intended to reduce CCPs and should not endanger food safety.	**USA** Rationale: Indicating that all seven principles should be applied is not consistent with the text in paragraph 133 that says "Although it is not always feasible to apply HACCP at primary production, some of the principles can be applied." We think that "size" is not needed – small businesses can produce high-risk foods. Moreover, the aspects listed to be taken into account address size (e.g., human and financial resources).
The application of the HACCP principles to develop an effective HACCP system should be the responsibility of each individual business. However, … This flexibility should take into account the nature ~~[and~~ and ~~size]~~ size of the operation, including the human and financial resources, infrastructure, processes, knowledge and practical constraints, as well as the risk associated with the produced food. The flexibility is not intended to reduce CCPs and should not endanger food safety.	**Senegal** Rationale: The size of the organisation must be taken into account for flexible implementation of an HACCP system.
The application of the HACCP principles to develop an effective HACCP system should be the responsibility of each individual business. However, … This flexibility should take into account the	**Morocco** Rationale: The size of the establishment should be taken into account for the flexibility of an

nature [and size] of the operation, including the human and financial resources, infrastructure, processes, knowledge and practical constraints, as well as the risk associated with the produced food. The flexibility is not intended to reduce CCPs and should not endanger food safety.	HACCP system.
The application of the HACCP principles to develop an effective HACCP system should be the responsibility of each individual business…	**Peru** The flexibility mechanism that would be provided to the SLDBs is not specified.
Small and/or less developed businesses do not always have the resources and the necessary expertise on site for the development and implementation of an effective HACCP plan…	**Safe Supply of Affordable Food Everywhere** This should be more than a HACCP plan, so change it to HACCP System. Actually the entire Chapter Two should be checked for this use of HACCP System or HACCP Plan. Small and/or less developed businesses do not always have the resources and the necessary expertise on site for the development and implementation of an effective HACCP plan. & A comprehensive explanation of the basis for the HACCP plan should be provided to the FBO. The definitions of HACCP Plan and HACCP System should be added to the list of definitions for clarity to understand they are not the same thing.
APPLICATION	
The food business operator should assure that the appropriate product specific knowledge and expertise are available for the development of an effective HACCP plan. Optimally, this may be accomplished by assembling a multidisciplinary team that includes individuals conducting different activities within the operation, e.g., production, maintenance, quality control, sanitationcleaning and disinfection, etc.	**USA**
The HACCP team should identify the scope of the HACCP system and applicable prerequisite programmes and is responsible for writing the HACCP plan. The scope should describe which segment of the food chain is involved products and the general classes of hazards (biological, chemical, physical) to be addressed (e.g. does it cover all classes of hazards or only selected classes). processes are covered.	**USA** Rationale: We do not think it appropriate to limit a HACCP plan to selected classes of hazards. The "segment of the food chain" involved is based on the food business developing the HACCP plan and those aspects under its control. However, businesses may have multiple HACCP plans to address different food products and processes, which would be described in the scope of the HACCP plan.
A full description of the product should be developed, including relevant safety information such as composition, physical/chemical characteristics.	**Costa Rica** Costa Rica proposes referencing paragraph 54 to avoid repeating information.
The intended use should describe Describe the use intended by the FBO and the expected uses of the product by the next user in the food chain or the consumer (they are the end user); it the description should also include ways in which consumers are known to use the product other than those intended by the FBO…	**USA**
The intended use product should describe the use intended by the FBO and the expected uses of the product by the next user in the food chain or the consumer (they are the end user);	**Nicaragua**
The intended use should describe the use intended by the FBO and the expected uses of the product by the next user in the food chain	**Safe Supply of Affordable Food Everywhere** This paragraph needs more examples of unintended uses such as eating raw or undercooked doughs/batters of bakery items or meat, not refrigerating after opening, not following the validated

or the consumer (they are the end user)…	cooking instructions
Construct flow diagram (Step 4)	**Costa Rica** Costa Rica proposes referencing paragraph 57 to avoid repeating information.
The flow diagram should be constructed by the HACCP team. The flow diagram should cover all steps in the production of a specific product,.. ~~When applying HACCP to a given step, consideration should be given to steps preceding and following the specified step.~~ The flow diagram should indicate all the flows,…	**USA** Rationale: This paragraph is about developing the flow diagram, not about how to apply it. Moreover, it is not clear what is expected in considering steps that come before and after a specific step.
The flow diagram should be constructed by the HACCP team. The flow diagram should cover all steps in the production of a specific product,… The flow diagram should indicate all the flows, including those of ingredients, ~~personnel,~~ water and ~~air~~air if relevant…	**Japan** We think these items are often controlled by GHP and therefore more optional. And generally, personnel is not an element of the flow diagram.
The flow diagram should be constructed by the HACCP team. The flow diagram should cover all steps in the production of a specific product, including the applicable rework. …	**Peru**
where applicable reworking and recycling take place;	**Peru**
Steps should be taken to confirm the processing activities against the flow diagram during all stages and hours of operation and amend the flow diagram where appropriate. The confirmation of the flow diagram should be performed by a person or persons with sufficient knowledge of the processing operation.	**Safe Supply of Affordable Food Everywhere** HACCP is about more than steps of the process so materials need to be added. List all potential hazards associated with each step, conduct a hazard analysis to identify the significant hazards, and consider any measures to control identified hazards (Step 6 and Principle 1)
List all potential hazards associated with each step, conduct a hazard analysis to identify the significant hazards, and consider any measures to control identified hazards (Step 6 and Principle 1)	**IDF** Several places: A “potential hazard” does not exist. Use the phrase “hazard that may potentially occur”
Hazard analysis consists of identifying potential hazards and evaluating these hazards to determine which hazards are significant for the specific food business operation... [Translator’s Note: the suggested change in the French version does not have an impact on the English version; Senegal suggests correcting the translation of “hazard” because it says “risk” (risque) instead of “hazard” (danger); danger is the preferred and correct term in French.]	**Senegal**
The HACCP team should next evaluate the hazards to identify which of these hazards are of such a nature that their prevention, elimination, or reduction to acceptable levels is essential to the production of safe food (i.e., determine the significant hazards that need to be addressed in a HACCP plan)~~, taking the effect of GHPs in place into account..~~ .	**Nicaragua** We propose striking the last portion of the sentence as it is confusing.
In conducting the hazard analysis (i.e. hazard identification and hazard evaluation) to determine whether there are significant hazards, wherever possible the following should be considered:	**IDF** The indents is a mix of hazard identification exercises (1st, 2nd indent) and hazard evaluation exercises /the rest). The guidance could benefit from a clearer separation into the two exercises.
In conducting the hazard analysis (i.e. hazard identification and hazard evaluation) to determine whether there are significant	**Senegal**

hazards, wherever possible the following should be considered: [Translator's Note: the suggested change in the French version does not have an impact on the English version; Senegal suggests correcting the translation of "hazard" because it says "risk" (risque) instead of "hazard" (danger); danger is the preferred and correct term in French.]	
the ~~likely~~ likelihood of occurrence of ~~hazards~~hazards in the absence of control;	**USA**
the likelihood that the hazard, if present, would cause illness or injury and the severity of the ~~same~~hazard if not controlled;	**USA**
the likelihood that the hazard, if ~~present~~not controlled, would cause illness or injury and the severity of the same;	**IDF**
the nature of the facility and the equipment used in making a food product ~~if not controlled~~	**USA**
the nature of the facility and the equipment used in making a food product if not controlled	**Switzerland** meaning of the bullet not clear
survival or multiplication of microorganisms of concern;	**IDF** The 6th indent should also address declining (levels of some hazards may decline during manufacturing (dilution, separation of fractions, maturation steps, etc.)
survival or multiplication of pathogenic microorganisms ~~of concern~~;	**Peru** The microorganisms that affect safety are pathogens.
conditions leading to the above.	**IDF** The last indent relates to "conditions leading to the above". We note that this indent will only make sense if the reference to conditions are removed from the definition of hazard. Otherwise, the "condition" would be covered by all references to "hazard" throughout the document.
The hazard analysis should consider not only the intended use,… [Translator's Note: the suggested change in the French version does not have an impact on the English version; Senegal suggests correcting the translation of "hazard" because it says "risk" (risque) instead of "hazard" (danger); danger is the preferred and correct term in French.]	**Senegal**
The hazard analysis should consider not only the intended use, but also any known unintended use (e.g. a soup mix intended to be mixed with water and cooked but known to be used without a heat treatment in flavouring a dip for chips)…	**Safe Supply of Affordable Food Everywhere** This should be moved to #149
In some cases, it may be acceptable for a more simplified hazard analysis to be carried out by FBOs. This simplified process identifies groups of hazards (microbiological, physical, chemical) in order to control the sources of these hazards without the need for a comprehensive hazard analysis that identifies the ~~specific~~ specific/significant hazards of concern…	**Japan**
In some cases, it may be acceptable for a more simplified hazard analysis to be carried out by FBOs. This simplified process	**Peru** We do not agree with a simplified hazard analysis, as this would jeopardize product safety and

identifies groups of hazards…	suitability.
In some cases, it may be acceptable for a more simplified hazard analysis to be carried out by FBOs. This simplified process identifies groups of hazards (microbiological, physical, chemical) in order to control…	**Costa Rica** Costa Rica believes it is important to clarify which cases.
Hazards which are of such a nature that their prevention, elimination or reduction to acceptable levels is essential to the production of safe food,… this may be achieved with the application of good hygiene practices, some of which may target a ~~specific~~ significant/specific hazard, (for example, cleaning equipment to control contamination of ready-to-eat foods with *Listeria monocytogenes*) or to prevent food allergens being transferred from one food to another food that does not contain that allergen when the two foods are processed on the same equipment. In other instances, control measures will need to be applied at critical control points. ~~An illustrative example of a decision-tree is attached at Appendix 1:~~	**Japan** Regarding a decision-tree, please refer to the Japan's response to Q7.
Consideration should be given to what control measures, if any exist, can be applied to each hazard. More than one control measure may be required to control a ~~specific~~ significant/specific hazard and more than one hazard may be controlled by a specified control measure….	**Japan**
Principle 2 **Determine Critical Control Points (Step 7 and Principle ~~3~~)2)**	**USA**
Determine Critical Control Points (Step 7 and Principle ~~3~~)2)	**Malaysia**
Determine Critical Control Points (Step 7 and Principle 3)	**Senegal** We believe that the decision tree is useful and should be included in the document. However, replace the words “higher GHP control” and “GHP measure requiring a higher level of control” with “GHP requiring more attention.” Also, replace “Prior Programs” with “GHP.” We also suggest replacing “hazards” with “hazard” because this involves using the chart to examine each important hazard individually during CCP identification.
Determine Critical Control Points (Step 7 and Principle 3)	**Colombia** **[Change does not apply to the English text]**
Q7 decision tree at Diagram 2 provided by Brazil and amended by UK. Are Members content with this inclusion?	**Chile** Question 7: decision tree at Diagram 2 provided by Brazil and amended by UK. Are Members content with this inclusion? We think the decision tree would be only useful if it is updated to the language used on the draft document, since now is still talking about PRP ´s which are not mentioned in the current document. So we proposed that if it is maintained as it is it should be removed from the draft.
Q7	**FoodDrinkEurope** □ Adding this decision tree, though well intentioned, may add confusion. Therefore, we would propose not to add it.
Q7	**Egypt** Yes, agree and prefer to the decision tree at Diagram 2 provided by Brazil and amended by UK.

Q7	**USA** We think the decision tree found in Appendix 1 (as referenced in paragraph 157) is acceptable with some modifications. Rationale: The decision tree is a tool that leads to a determination of GHPs, GHPs that require additional attention, and CCPs.
Q7	**Canada** If the decision tree is maintained, we propose to change the question "is a GHP measure requiring a higher level of control necessary to control hazards?" to: "is the hazard being addressed at this step significant?" If no: "This is a GHP", if yes: "is there a [defined]/ [measurable] limit that can be achieved for this hazard using a specific control measure" if yes: "this step is a CCP", if no: "the GHP applied at this step warrants a higher level of attention (increased monitoring and verification)" Canada questions the inclusion of the new decision tree for the following reasons: - Its relation to the current CCP decision tree is not clear (is it meant to replace it?) - The way the question about "higher GHP control" is formulated implies that the operator already knows the answer (is the GHP "basic" or "enhanced"), so it does not assist in this determination. See proposed new wording in the previous column if this tree is maintained.
Q7 • Adding this decision tree, though well intentioned, may add confusion. The Q.1 does not give the appropriate answer. eg. PRP is cleaning of meat slicer,as How would an industry apply this , needs to be worked out. Therefore, **we would propose not to add it** • While the addition of GHP step as a higher control measure is welcome, but Q3 spirit should not get diluted	**India** We propose this since this was correctly captured in CAC/ RCP 1-1969. The "specifically designed" control measure, whose objective is to reduce the hazard to an acceptable limit, should be maintained. Else we will end up overloading CCPs (it will be deemed as independent control rather than a subsequent control).
Q7	**Mauritius** CCP decision tree introduces a new concept "Higher GHP control" which is not defined. The distinction between "PRPs", "GHP measure" and "Control measures" is not clear.
Q7	**Mauritius** the proposed decision tree at Diagram 2 is confusing, and less explicit than the previous Codex CCP decision tree. We are not content with this inclusion. It is also not aligned with ISO 22000 OPRPs (Operational PRPs).
Q7	**Japan** Inclusion of decision tree is not necessary since it is well-described in the current paras 157 and 159 that significant hazards are controlled by a control measure at CCP or by GHP with a higher level of control.
Q7	**IDF** Experience has shown that decision trees tend to become mandatory and the primary focus in existing HACCP systems. If included, its role as a supportive voluntary tool to making decisions only, should be stressed. It should also be emphasized that such a decision tree is not useful in all cases. For instance, it implies that only one CCP exists for each hazard and that CCPs are always located at the last possible process step. Further, the draft decision tree introduces the term "higher GHP control", which is a new term that is not clear (does "higher" refer to higher physical location?). As stated earlier in our comments, this implies that there is a need to allocate a group of control measures to those GHPs that are more

	important than others. We prefer introducing OPRPs Finally, we note that the draft decision tree (Question 3) would allow significant hazards to pass through without identifying the need of their control – possibly an arrow is missing from Question 3.
Q7	**Guyana** yes, content with this inclusion
Q7	**Malaysia** Malaysia is of the view that Diagram 2 should be deleted because : i) It is not clear and would create more confusion. ii) The use of the term "higher GHP" is not defined anywhere in the text.
Q7	**Kenya** we accept to the decision tree with the new inclusions provided.
Q7 decision tree at Diagram 2 provided by Brazil and amended by UK. Are Members content with this inclusion?	**Morocco** Morocco believes that the decision tree is useful and should be included in the document. However, replace the words "higher GHP control" and "GHP measure requiring a higher level of control" with "GHP requiring more attention." Also, replace "Pre-Requisites Programs" with "GHP." Rationale The decision tree is streamlined and helpful to identify the various types of hazards. Using the statement "GHP requiring more attention" is appropriate.
Q7: Decision tree at Diagram 2 provided by Brazil and amended by UK. Are Members content with this inclusion?	**Panama** Panama finds this proposal to be very confusing. We do not agree with this new decision tree, for now, until it is clarified and/or improved.
Q7	**Peru** We do not agree. We suggest the previous version of the Code of Practice CAC/RCP 1-1969 should be kept, for enhanced application in the food industry.
Q7	**Uruguay** We agree with this inclusion. Under Q1 in the tree, replace "PRP" with "GHP" and under Q3, add an arrow for 'Yes'.
Q7	**Argentina** The tree is useful in terms of how it is tailored to the document text.
Q7	**Colombia** Colombia finds the table acceptable and clear.
Q7	**Costa Rica** Costa Rica supports the proposed decision tree.
Q7	**Safe Supply of Affordable Food Everywhere** Propose using existing codex ccp decision tree https://myhaccp.food.gov.uk/sites/default/files/resources/codex_decision_tree_0.pdf YES, but needs some changes. In the box after answering Yes to the first question, how would you determine if the GHP requires a higher level of control to control the hazard? For Question 3, should prevent be included in this question as a CCP can prevent, eliminate or reduce to an acceptable level?
Q7	**IDF** Experience has shown that decision trees tend to become mandatory and the primary focus in

	existing HACCP systems. If included, its role as a supportive voluntary tool to making decisions only, should be stressed. It should also be emphasized that such a decision tree is not useful in all cases. For instance, it implies that only one CCP exists for each hazard and that CCPs are always located at the last possible process step. Further, the draft decision tree introduces the term “higher GHP control”, which is a new term that is not clear (does “higher” refer to higher physical location?). As stated earlier in our comments, this implies that there is a need to allocate a group of control measures to those GHPs that are more important than others. We prefer introducing OPRPs Finally, we note that the draft decision tree (Question 3) would allow significant hazards to pass through without identifying the need of their control – possibly an arrow is missing from Question 3.
Critical control points are to be determined for each of the hazards identified as significant in the hazard analysis…Determining whether or not the step at which a control measure is applied is a CCP in the HACCP system can be facilitated by the application of a decision tree (e.g.~~, Diagram 2)~~,Appendix 1)…	**USA**
Critical control points are to be determined for each of the hazards identified as significant in the hazard analysis… Similarly, a CCP may control more than one hazard (e.g. cooking can be a CCP that addresses several microbial pathogens). ~~Determining whether or not the step at which a control measure is applied is a CCP in the HACCP system can be facilitated by the application of a decision tree (e.g., Diagram 2). Application of a decision tree should be flexible, given whether the operation is for production, slaughter, processing, storage, distribution or other processes. Other approaches may be used. Training in the application of the decision tree is recommended.~~	**Japan** Please refer to the Japan's response to Q7.
~~Critical control points are to be determined for each of the hazards identified as significant in the hazard analysis.~~ CCPs are established at steps where control is essential…	**Switzerland** delete first sentence, as it contradicts para 157, stating that hazards can be controlled by other ways, e.g. GHPs
Critical control points are to be determined for each of the hazards identified as significant in the hazard analysis. CCPs are established…	**Peru** In Diagram 1, a logical sequence is not observed for applying the HACCP system and Diagram 3 is the worksheet example for the HACCP system.
If a significant hazard has been identified at a step where control is necessary for safety, and no control measure exists at that step, or any other step, then the product or process should be modified to include a control measure. Also, in case the step where a significant hazard occurs may differ from the step where a control measure (or combination of control measures) is applied to eliminate the significant hazard (e.g. a metal shard, which contaminates a product at the cutting step, should be detected at the packing step), care should be taken to determine CCPs.	**Japan** Japan proposes to provide an additional case that requires attention in determining CCPs.
If a significant hazard has been identified at a step where control is necessary for safety, and no control measure exists at that step, or any other step, then the product or process should be modified to include a control measure.	**Safe Supply of Affordable Food Everywhere** What about products that are sold with a known significant hazard that has to be controlled by the next customer? These could include raw agricultural commodities or products we call Ready to Cook.

Critical limits that separate acceptable products from unacceptable ones should be specified and validated for each Critical Control ~~Point~~Point (refer to principle 6 for more information on validation)…	**Canada** We suggest putting back the word "validated" after "specified" (as is in the current haccp annex), and adding a reference to principle 6 where the concept of validation is further developed.
~~Control measures and their critical~~ Critical limits for control measures should be scientifically validated to obtain evidence that they are capable of controlling hazards to an acceptable level if probably implemented.[8] FBOs may not always need to commission studies themselves to validate control measures. Critical limits could be based on existing ~~literature~~ literature, regulations, or guidance from competent authorities or studies carried out by a third party e.g. cleaning compounds validated for effective use by the manufacturer.	**USA** Rationale: There are other sources of critical limits than existing literature. Control measures was deleted at the beginning since the paragraph is about critical limits.
~~Control measures and their critical limits should be scientifically validated to obtain evidence that they are capable of controlling hazards to an acceptable level if probably implemented.[8] FBOs may not always need to commission studies themselves to validate control measures. Critical limits could be based on existing literature or carried out by a third party e.g. cleaning compounds validated for effective use by the manufacturer.~~	**Canada** Principle 3 being specific to critical limits, we suggest deleting paragraph 162 to prevent repetitions with the text on validation in principle 6. Note that if the committee choose to retain paragraph 162, the text would need to be modified, for example: • "Probably implemented" should read "properly implemented" • The example provided at the end of the paragraph does not seem appropriate in the context of CCP.
Control measures and their critical limits should be scientifically validated to obtain evidence… Critical limits could be based on existing literature or carried out by a third party e.g~~. cleaning compounds validated for effective use by the manufacturer.~~ . challenge test to determine shelf-life of RTE sushi.	**Switzerland** cleaning" example refers rather to GHP
Control measures and their critical limits should be scientifically validated to obtain evidence that they are capable of controlling hazards to an acceptable level if ~~probably~~ PROPERLY implemented…	**Safe Supply of Affordable Food Everywhere**
Where HACCP guidance developed by experts, instead of the HACCP team, has been used to establish the critical limits, care should be taken to ensure that these limits fully apply to the specific operation, product or groups of products under consideration. The validation information for the critical limits needs to be understood and located at the facility.	**Safe Supply of Affordable Food Everywhere** This paragraph should include a statement about having on hand at the plant the validation information for the specific products and processes as well.
Monitoring is the scheduled measurement or observation at a CCP relative to its critical limits... Further, monitoring should ideally provide this information in ~~real-time~~ time to make adjustments to ensure control of the process to prevent violating the critical limits…	**Thailand** We think that the real-time information might be too specific. Information provided in time to make adjustment can also be used to ensure control of the process.
If monitoring is not continuous, then the amount or frequency of monitoring should be sufficient to ensure the ~~CCP is in control~~critical limit has been met for every batch of products. Most monitoring procedures for CCPs will need to be done rapidly because they relate to on-line processes and…	**Canada** To be consistent with the Canadian comment in the Comparison table, row 6, second bullet, where we indicated that the proposed alternative text was vague and open to interpretation.
Establish corrective actions (Step 10 and Principle 5)	**Nicaragua**

	[Change does not apply to the English]
Establish corrective actions (Step 10 and Principle 5)	**Uruguay** **[Change does not apply to the English]**
Establish corrective actions (Step 10 and Principle 5)	**Colombia** **[Change does not apply to the English]**
The corrective actions should ensure that the CCP has been brought under control and food that is potentially unsafe is handled appropriately… Details of the corrective actions, including the cause of the deviation and product disposal procedures should be documented in the HACCP ~~record keeping~~records. Periodic review of corrective actions should be undertaken to identify trends and to ensure corrective actions are effective.	**USA**
The corrective actions should ensure that the CCP has been brought under control and food that is potentially unsafe is handled appropriately and does not reach consumers. Actions taken should include segregating the affected product and analysing the safety of the product to ensure proper disposal of the affected product. External experts may be needed to conduct such evaluations. In some cases, the evaluation may indicate that the product is safe and can be released into commerce. In other cases, it may be determined that the product could be reprocessed (e.g., re-pasteurised) or ~~the product could be diverted to another use (e.g., contaminated minced meat intended to be sold fresh used in a cooked product that destroys pathogenic *E. coli*)~~…	**Peru** The example promotes the use of a contaminated commodity for use in other products for human consumption and does not consider other forms of contamination.
Establish validation and verification procedures (Step 11 and Principle 6) **Establish validation procedures (Step 13 – Applicable to all principles)**	**Brazil** Create a new step and relocate the paragraphs that deal with validation (eg, paragraphs 170 and 171).
Establish ~~validation and~~ verification procedures (Step 11 and Principle 6)	**Brazil** In this topic only the paragraphs referring to the verification should be left. Delete paragraphs 170 e 171.
Establish ~~validation and~~ validation, verification and review procedures (Step 11 and Principle 6)	**Japan** For consistency with the content of paras 170-175.
Establish validation and verification procedures (Step 11 and Principle 6)	**Uruguay** While we do agree with the new proposed title, we suggest the following: [sic]
Establish validation and verification procedures (Step 11 and Principle 6)	**Colombia** **[Change does not apply to the English]**
Q8: This section has been retitled and includes additional text – are members content with the amendments?	**Chile** Question 8: This section has been retitled and includes additional text – are members content with the amendments? Yes, we agree with the text included. It s helps to understand the validation role in HACCP.
Q8:	**Egypt** Yes , agree to content with the amendments.

Q8:	**USA** We agree to the text in this section with some minor changes. Rationale: We think it appropriate to include both verification and validation here and the text provides more guidance on these activities.
Q8:	**Canada** Canada suggests that validation be developed as a concept under principle 6 rather than principle 3 as it applies to more than just the critical limits. Canada supports the new text proposed under Principle 6 and suggests some modifications to the text for Principle 3 in paragraphs 161 and 162.
Q8:	**Mauritius** Question 8: we are VERY content with the amended title of this section and the additional text.
Q8:	**Guyana** Validation of the control measures suggested or implemented is not necessary because at this point verification and effectiveness checks of those control measures are more important. To validate may incur additional time for acceptance of the proposed control measure. It might be more appropriate to include a risk assessment in Principle 1 and that would eliminate the need for a validation here and based on the previous question response to have it addressed under Principle 3. The Section should probably be titled: Establish Verification procedures and evaluate the effectiveness of the implemented control measures
Q8:	**Safe Supply of Affordable Food Everywhere** Validation requirements should be in principle 3 and verification in principle 6 because they are two separate activities Yes but noting further comments...
Q8:	**Kenya** we accept the amendments.
Q8:	**Morocco** Morocco supports the name change to include validation in HACCP Principle 6 Rationale Establishment of the validation procedure was not included and it is as important as the initially included establishment of verification procedures.
Q8:	**Panama** Panama agrees to the new title.
Q8:	**Peru** Yes, we agree.
Q8:	**Argentina** Argentina agrees to the changes to the title and the added text. We understand that this clarifies the text and the verification and validation concepts.
Q8:	**Colombia** The change is appropriate and clarifies the scope of the principle.
Q8:	**Costa Rica** Costa Rica agrees with this proposal.
Q8:	**FoodDrinkEurope** • We find these paragraphs ok however, there are some repeats but we understand that the

	intent is to separate different verification activities.
Q8:	**IDF/FIL** We highly recommend to separate validation from verification. These two terms are not correctly understood by most HACCP users, and confusion will be maintained if they are not kept separate. The correct place to address validation is at the end of the planning phase (when determining the control measures). In this document, correct location of the current paragraphs 170 &171 would be after paragraph 163. We note that the text on validation refers to “control measures”, but it is not clear whether control measures that are not identified as CCPs (including critical limits) need to be validated (as required by CODEX GL 69 and ISO 22000). In paragraphs 174 and 175, we note the use of the term “hazard control measure”. This term is not used elsewhere in the document, and its meaning is unclear.
Establish validation and verification procedures for individual control measures, as well as the HACCP system as a whole. Validation involves obtaining scientific and technical evidence that control measures are capable of controlling a hazard whereas verification involves activities to verify on an ongoing basis that the hazard control measures are being implemented as intended (i.e. in accordance with the HACCP plan). Verification also includes reviewing the adequacy of the HACCP system periodically and, as appropriate, when changes occur, e.g., to products or processes..	**USA** Rationale:To provide an example of the types of changes.
Where possible, initial validation is performed during development of the HACCP plan. ~~In addition to obtaining the evidence that the control measures are capable of controlling the hazard, it includes obtaining evidence in operation during the initial implementation of the HACCP system to show that control can be achieved consistently under production conditions.~~ Validation is applied during the establishment of critical limits to ensure that the appropriate values are chosen. This could include a review of scientific literature, using mathematical models, conducting validation studies, or using “safe harbours” developed by authoritative sources. ~~Validation is also done on a periodic basis when~~ In addition to obtaining the ~~plan is reanalysed and when changes indicate~~ evidence that the ~~need for re-validation~~control measures are capable of controlling the hazard, validation includes obtaining evidence in operation during the initial implementation of the HACCP system to show that control can be achieved consistently under production conditions. Validation is described more fully in the *Guidelines for the Validation of Food Safety Control Measures* (CXG 69 – 2008).	**USA** Rationale: First “deletion” is a move to better order of text. The second “deletion “is to move the text to follow paragraph 172 on initial validation (172 bis).
Where possible, validation is performed during development of the HACCP plan…Validation is also applied during the establishment of critical limits to ensure that the appropriate values are chosen…	**Japan**
Where possible, validation is performed during development of the HACCP ~~plan~~plan (see step 8)… This could include a review of scientific literature, using mathematical models, conducting	**Switzerland** is expression "safe Harbours" widely understood? Reference to validation is already there

validation studies, or using ~~"safe harbours"~~ **"safe harbours"** developed by authoritative sources. Validation is also done on a periodic basis when the plan is reanalysed and when changes indicate the need for re-validation. ~~Validation is described more fully in the *Guidelines for the Validation of Food Safety Control Measures* (CXG 69 – 2008).~~	
Where possible, validation is performed during development of the HACCP plan. Validation is applied during the establishment of critical limits to ensure that the appropriate values are chosen. This could include a review of scientific literature, using mathematical models, conducting validation studies, or using "safe harbours" developed by authoritative sources. In addition to obtaining the evidence that the control measures are capable of controlling the hazard, validation also includes obtaining evidence during operation in the initial implementation of the HACCP system to show that control can be achieved consistently under production conditions. Validation is also done on a periodic basis when the plan is reanalysed and when changes indicate the need for re-validation. Validation is described more fully in the Guidelines for the Validation of Food Safety Control Measures (CXG 69 – 2008).	**Safe Supply of Affordable Food Everywhere**
~~Where possible,~~ Validation is performed during development of the HACCP plan. In addition to obtaining the evidence that the control measures are capable of controlling the hazard,...	**Senegal**
Where possible, validation is performed during development of the HACCP plan… This could include a review of scientific literature, using mathematical models, conducting validation studies, or using alternative measures ~~"safe harbours"~~ developed by authoritative sources…	**Peru** The translation is confusing.
After validation, verification activities should be performed on an ongoing basis to ensure the HACCP system functions as intended and continues to operate effectively. Verification, which includes observations, ~~auditing~~auditing(internal & external), calibration, sampling and testing, and records review, can be used to determine if the HACCP system is working correctly and as planned. Examples of verification activities include:	**Jamaica**
After initial validation, verification activities should be performed on an ongoing basis to ensure the HACCP system functions as intended and continues to operate effectively. Verification, which includes observations, auditing, calibration, sampling and testing, and records review, can be used to determine if the HACCP system is working correctly and as planned. Examples of verification activities include:	**USA**
~~review~~ reviewing of monitoring records to confirm that CCPs are kept under control;	**USA**
~~review~~ reviewing of corrective action records, including specific	**USA**

deviations, product disposals and any analysis to determine the root cause of the deviation;	
~~calibration~~ calibrating or checking the accuracy of instruments used for monitoring and verification;	**USA**
calibration or checking the accuracy of instruments used for monitoring and verification;	**Panama** Panama suggests striking the word 'accuracy' and replacing 'or' with 'and/or', to read as follows: calibration of instruments used for monitoring and/or verification; Rationale: Given that the purpose of the text is to obtain reliable measurement results, the International Vocabulary of Metrology (VIM) defines this as measurement accuracy. VIM defines this as: closeness of agreement between a measured quantity value (accuracy) and a true quantity value of the measurand (veracity). Based on the foregoing, as the document stands now, "calibration or checking the accuracy…" does not take into consideration a complete measurement control. We, therefore, suggest amending the text bearing in mind ISO 17025:2017.
~~observation~~ observing that control measures are being conducted in accordance with the HACCP plan;	**USA**
Sampling and testing the environment for microbial contaminants and their indicators, such as *Listeria*; and	**Peru** **[Change does not apply to the English text]**
sampling and testing, e.g., for microorganisms[9] (pathogens or their indicators) or chemical hazards such as mycotoxins to verify product safety; sampling and testing the product, e.g., for microorganisms (pathogens or their indicators) or chemical hazards such as mycotoxins to verify product safety;	**Safe Supply of Affordable Food Everywhere** Needs to be more clear on the testing: sampling and testing, e.g., for microorganisms (pathogens or their indicators) or chemical hazards such as mycotoxins to verify product safety;
sampling and testing the environment for microbial contaminants and their indicators, such as *Listeria*; and	**FoodDrinkEurope** □ We would suggest to remove listeria as an example to avoid confusion □ Rationale: In a dry environment the microorganisms could be entirely different
~~review~~ reviewing of the HACCP system, including the hazard analysis and the HACCP plan (e.g. internal and/or third-party audits). Paragraph 172 bis.(new) Validation is also done on a periodic basis when the plan is reanalysed and when changes indicate the need for re-validation.	**USA** Recommendation: Add as 172 bis the text from paragraph 171 about reanalysis:
Ideally, ~~Verification~~ verification should be carried out by someone other than the person who is responsible for performing the monitoring and corrective actions. Where certain verification activities cannot be performed in house, verification should be performed on behalf of the business by external experts or qualified third parties.	**Japan**
Verification should be carried out by someone other than the person who is responsible for performing the monitoring and	**Nicaragua** We suggest including "Competent authorities should use their own official verification programs."

corrective actions. Where certain verification activities cannot be performed in house, verification should be performed on behalf of the business by external experts or qualified third parties.	
The frequency of verification activities should be sufficient to confirm that the HACCP system is working effectively. Verification of the implementation of hazard control measures should be conducted with sufficient frequency to determine that the HACCP plan is being implemented properly.	**USA**
Verification and validation activities should include a comprehensive review (e.g. reanalysis or an audit) of the HACCP system periodically, as appropriate, or when changes occur, to confirm the efficacy of all elements of the HACCP system…	**USA** Because this review is considered by some to be verification and others to be validation, we suggest using both terms here; the term used is not important, but the activity is.
Establish documentation and record keeping (Step 12 and see Principle 7)	**Uruguay** **[Change does not apply to the English]**
Establish documentation and record keeping (Step 12 and see Principle 7)	**Colombia** **[Change does not apply to the English]**
A simple record-keeping system can be effective and easily communicated to employees. It may be integrated into existing operations and may use existing paperwork, such as delivery invoices, and checklists to record, for example, product temperatures. Where appropriate, ~~R~~records can also be maintained electronically.	**Peru** Some records are designed to be maintained physically as evidence of parameter control. For example, control charts or thermographs of some thermal treatment equipment, e.g. pasteurization, UHT.
Training of personnel in ~~industry, government and academia~~ each Food establishment in HACCP principles and applications is an essential element for the effective implementation of HACCP. As an aid in developing specific training to support a HACCP plan, working instructions and procedures should be developed which define the tasks of the operating personnel in charge of each Critical Control Point. Training programs should be reviewed periodically and updated where necessary. Re-training may be needed as part of corrective actions for some deviations.	**Switzerland**
Training of personnel in industry, government and academia in HACCP principles and applications is an essential element for the effective implementation of HACCP. Cooperation between primary producer, industry, trade groups, consumer organisations, and responsible authorities is vitally important. Opportunities should be provided for the joint training of industry and competent authorities to encourage and maintain a continuous dialogue and create a climate of understanding in the practical application of HACCP.	**Switzerland**
Suggested by Brazil (modified) – see paragraph 155	**Japan** Please see the Japan's response to Q7.
Appendix 1 **Suggested by Brazil (modified) – see paragraph 155**	**Switzerland**
Flowchart to determine whether a particular step or procedure is a	**USA** Appendix 1: Decision Tree

CCP or requires higher GHP Control	Recommendation: Title the Appendix "Decision tree to determine whether a step or procedure is a GHP, a GHP requiring extra attention, or a CCP." Change Question 1 to read "Is the hazard controlled by GHPs?" The box under the "yes" to question 1 should read: "Is a GHP measure requiring extra attention necessary to control a specific hazard?" A yes from this box should lead to a box that says "GHP requiring extra attention." Question 2 should read "Are there control measures for a hazard at this step?" Question 3 should read "Can this step prevent, eliminate, or reduce hazards to an acceptable level. Add the missing arrow from this box to the "yes" box. Question 4 should read "Can a subsequent step prevent, eliminate or reduce the hazard to an acceptable level. A "Yes" to this question should lead to a box that reads "Go to Question 1 and repeat the process for subsequent steps."
Flowchart to determine whether a particular step or procedure is a CCP or requires higher GHP Control	**Brazil** Brazil proposes changes in the flowchart.
Flowchart to determine whether a particular step or procedure is a CCP or requires ~~higher~~ GHP ~~Control~~with higher level of control	**Thailand** We think that the term 'higher GHP control' should not be used. We concern that the term might still be interpreted as a category of control. For Question 3 of the Flowchart, the words 'specifically designed' do not appear so the meaning of the sentence will be quite different from the current Question 2 in CXC1-1969. Also, the Questions appeared in the Flowchart do not include Question 3 "Could contamination with identified hazard(s) occur in excess of acceptable level(s) or could there increase to unacceptable levels?" of the current CXC1-1969. We would like to ask whether or not this Question will be asked in the new Flowchart.
Logic diagram~~Flowchart~~ **to determine whether a particular step or procedure is a CCP or requires higher GHP Control**	**Senegal**
Proposal by Brazil (amended) – refer to paragraph 157	**Nicaragua** Nicaragua suggests considering Diagrams 1, 2, and 3 of the CAC RCP 1/1969 to better understand the diagram.
Proposal by Brazil (amended) – refer to paragraph 157	**Costa Rica** It's important to differentiate between GHPs and GRPs.
	Senegal Replace "hazards" with "hazard" because this involves using the chart to examine each important hazard individually during CCP identification.