

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda item 5

CX/FH 18/50/5-Add.2  
Original Language Only

## 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

*Comments of Australia, Brazil, European Union, New Zealand and African Union*

Australia

#### General comments

The working group has done a significant amount of work to progress this draft and although disappointing that the focus on the concept of “enhanced GHPS” has been reduced, the draft provides sufficient flexibility to adopt this concept into contemporary risk management frameworks.

#### Specific comments

Q1: There has been mixed views about this table –views are requested on whether it is useful or whether it should be deleted

Support retaining the table as a good comparison (could be placed at the back of the document)

Q2: Are there any FAO/WHO programmes which can be referenced here?

Q3: Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here?

Agree with the movement of text on water

Q4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?

No – monitoring is already covered under paragraphs 58 and 61 – 63.

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.

Cleaning and sanitizing are different processes and both are required in addition to maintenance (it is important that the distinction is kept). It is suggested that a definition of sanitation is included.

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.

Support validation being included under principle 3. Once the CCPs have been identified, critical limits for each CCP should be specified and validated where necessary.

Q7 - support the inclusion of a decision tree (should be reviewed once the text is finalised)

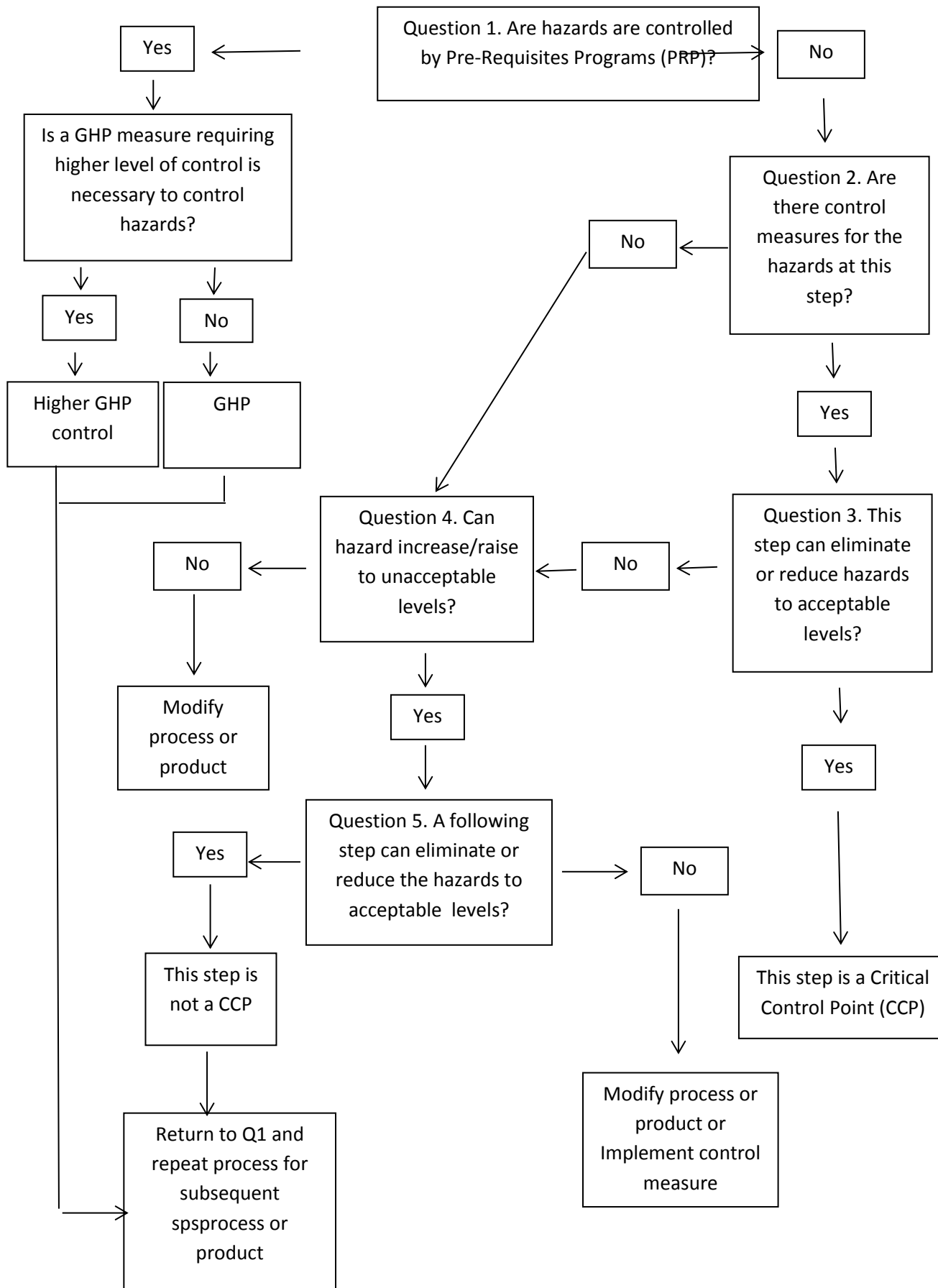
Q8. – No. It is confusing to mix validation and verification under Principle 6. Validation should be covered separately under Principle 3.

Paragraph	Comment
1.	FBOs <b>need</b> to be able to control hazards
4.	(e.g. the application of Good Hygiene Practices (Chapter 1) <b>and/or</b> HACCP principles, as described in Chapter 2).
9.	This document provides a framework of general principles for producing safe and suitable food for consumption by outlining necessary hygiene and food safety <del>conditions</del> <b>controls</b> to be implemented in production,
14.	Food business operators should apply the <del>hygienic practices and</del> food safety principles set out in this document to:
15.	<p>GENERAL PRINCIPLES</p> <p>Suggest simplifying and reordering as follows:</p> <p>(i) Food safety hazards should be controlled using a science based preventive approach to ensure food safety and suitability.</p> <p>(ii) Depending on the nature of the food business and the associated potential risks, hazards are controlled by GHPs and/or CCPs.</p> <p>(iii) GHPs provide the foundation for a <b>food hygiene system</b> and, in some cases, may be sufficient to manage hazards associated with a food business to ensure food safety and suitability.</p> <p>(iv) Some GHPs require more attention than others, as they have a greater impact on food safety. [Provide an example of what is meant by more attention?].</p> <p>(v) Significant hazards not controlled by GHPs are controlled by specific control measures at CCPs.</p> <p>(vi) Controls that are critical to achieve an acceptable level of food safety, including any GHPs as appropriate, should be scientifically validated<sup>1</sup></p> <p>(vii) The application of control measures and/or GHPs should be subject to monitoring, corrective actions, verification, and documentation, as appropriate.</p> <p>(viii) Food hygiene systems should be reviewed <del>periodically to determine if modifications are needed and</del> 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)- <b>and periodically to determine if modifications are needed.</b></p> <p>(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.</p>
DEFINITIONS	<p><b>Food hygiene system:</b> The combination of hygiene practices, including those that require additional attention, <del>and that,</del> when taken as a whole, ensures <del>that</del> food is safe and suitable for its intended use.</p> <p><b>Hazard:</b> support the removal of “or condition of” (otherwise an explanation of what is intended should be provided).</p>
37	Last sentence: “Adequate facilities for <b>toileting and</b> washing hands should be provided”.
43.	Depending on the nature of the food operations undertaken, adequate facilities should be available for heating, cooling, cooking, refrigerating and freezing food <b>and</b> for storing refrigerated or frozen foods, <del>monitoring premises, equipment and food temperatures, and when necessary, controlling ambient temperatures to ensure the safety and suitability of food.</del>
70.	In manufacturing and processing, suitable prevention strategies such as maintenance and regular inspection <b>of equipment should be undertaken</b> and <b>where necessary</b> , detection or screening devices should be used <del>where necessary</del> (e.g. metal detectors, sieves, etc.).
75.	What’s water of a higher standard? Suggest : Potable water should, <b>at a minimum</b> , meet the requirements as specified in the latest edition of WHO Guidelines for Drinking Water Quality, <del>or water of a higher standard.</del>
136.	Shouldn’t be referring to the application of HACCP to a sector – a FBO applies HACCP to a process. Paragraph should be reworked to remove confusion between sector specific guides to GHPs and the application of those GHPs by a FBO before implementing HACCP.
159.	Determining Critical Control Points is Principle 2, not 3.
170 – 175.	As per question 6 and 8, this section should focus on verification only.

<sup>1</sup> Guidelines for the Validation of Food Safety Control Measures (CXG 69-2008)

See paragraph 157

Flowchart to determine whether a particular step or procedure is a CCP or requires higher GHP control



## European Union

The European Union and its Member States (EUMS) would like to thank and congratulate the United Kingdom as chair and France, Ghana, India, Mexico and the United States of America as co-chairs of the EWG for the approach taken and the very useful preparatory work undertaken in view of a possible revision of CAC/RCP 1-1969. Nevertheless, the EUMS consider that a substantial revision is still needed.

### 1. Recommendations of the EWG

#### Answer to Q1

The EUMS do not see much added value in the Table in the text and therefore suggest moving it to an annex and addressing the specific comments below.

#### Answer to Q2

FAO/WHO to address in the first place. Although they relate to animal feed, it would be useful to reference the following documents:

- FAO and IFIF 2010 Good practices for the feed industry – Implementing the Codex Alimentarius Code of Practice on Good Animal Feeding
- FAO Animal Production and Health Manual No. 9. Rome.

#### Answer to Q3

The EUMS agree with the move to the section on water to keep all recommendations together. If water supply must be addressed between paragraph 37 and 38, a cross-reference to the water section could be inserted.

#### Answer to Q4

The EUMS consider a paragraph on the monitoring of temperature of premises, equipment and food very relevant in the General Principles and a significant help for small FBOs. It might also provide the opportunity to better explain GHP requiring higher control (e.g. by examples). Although the 3rd and 4th lines of paragraph 43 address this issue, a further paragraph may provide additional clarity which some readers may find helpful to include the need to verify the accuracy/tolerance of monitoring equipment and an indication of what an acceptable tolerance for monitoring equipment is.

#### Paragraph 75 on potable water

The term 'potable water' is well understood and could be used in the absence of a revised definition, however it might be useful to add 'potable water' to the list of definitions.

#### Answer to Q5

'Cleanliness' is more acceptable and meaningful than Sanitation. On a Global Food Safety Initiative Technical Working Groups (GFSI TWG) for food surfaces it was decided that cleaning relates to removal of soil and sanitising is reducing microbiological contamination or allergens to acceptable levels. 'Cleanliness' would need to be defined (clean and, where appropriate, disinfected) and referenced in the Objectives box 'Cleanliness' could also then be used within the table comparing GHPs and the HACCP Controls. Alternative option is "cleaning and disinfection".

#### Answer to Q6

The EUMS are of the opinion that this suggestion works, and is necessary, in both places. Whilst a change to the wording of a principle is a substantial change, the suggested change to Principle 3 as [Determine and validate critical limit(s)] is a good idea since this

is a key area requiring validation. Nevertheless, validation goes further than solely critical limits, e.g. validation of the suitability of monitoring procedures, validation of the overall suitability of the HACCP plan. Therefore, the inclusion in the guidelines at paragraphs 170 and 171 and with the new heading is also important..

#### Answer to Q7

A decision tree is considered very useful to explain the link between GHPs, GHPs requiring higher controls and CCPs. The details need to be further discussed and its use must be clearly indicated as optional for the FBO.

### Answer to Q8

This new title and amendments are helpful. The text could be extended slightly with further examples of validation needed, e.g. validation of the suitability of monitoring procedures to detect loss of control and the capability of corrective action procedures to

both bring the CCP back under control and deal with potentially unsafe food that has been produced during a deviation period.

### Position on "enhanced GHPs"

The EUMS support the recommendation of the EWG not to include the wording "enhanced GHPs", which is already addressed in the revised draft. Nevertheless, the needs for GHPs with higher control are hardly elaborated in the guidance. A section on monitoring of temperature could be used to provide examples what is meant by it.

## **2. General comments**

### Review of hazards

We note CX/FH 18/50/5 now provides for a definition of the term "review of hazards" (yet no proposed wording) which is mentioned under GHPs in the Comparison of GHP and HACCP Controls Table on page 5. This term has the potential to undermine and devalue the more usual and understood term "hazard analysis" and for this reason we have voiced our opposition in the past.

The hazard analysis, which can be carried out in a simplified way, is mandatory for all food business operators (perhaps with the exception of primary producers). Any deviation from that would contradict EU requirements and is considered as unacceptable in this draft guidance. Rather than inventing new confusing terminology (review of hazards), the draft should explain how the hazard analysis can be facilitated for certain establishments.

### Consistency of terminology

The EUMS repeat its regret that this revision was not used to enhance consistency with terminology used in ISO 22000 and existing Codex Alimentarius documents. Even if different guidance documents might be considered for different purposes, the topics are the same and consistent terminology might have simplified the understanding of the guides and therefore facilitated their application. In particular, the terminology includes:

- GHPs as used in the text, proposed alternative: codes of hygienic practice or prerequisite programs;
- Food Hygiene System, proposed alternatives: food safety management systems or food safety control system;
- ...

### Link between GHPs, GHPs with higher control and HACCP-based procedures

The EUMS consider that one of the key objectives of the revision (clarify the relationship between GHPs and HACCP), has not been properly addressed. Several paragraphs indicate such link, repeating or contradicting each other, e.g. paragraphs 6, 15(ii) and (v), 19, 25, 136, 139, 157 and the annexed flowchart/decision tree. Since this link connects the 2 Chapter, it should be elaboration before Chapter 1 on GHPs. The decision tree to conclude if GHPs are sufficient, whether GHPs with higher control, or CCP are required, could be connected to such section. The central role of the hazard analysis in such decision should be highlighted. Finally, more guidance should be provided on parameters (probability, severity, ...) how to decide whether GHPs are sufficient, when GHPs requiring higher controls are needed, or when CCP are essential. This could be based and make reference to the FAO/WHO document on 'Risk characterisation of microbiological hazards in food'<sup>2</sup> and 'Quality management systems in the food industry'<sup>3</sup> (see also specific comment on paragraph 154).

### Structure

The EUMS support the agreed structure being a general part and 2 Chapters (GHPs and HACCP system). However:

- A contribution on "Primary Production" is hanging somewhere in the first Chapter before a Section 1. The contribution on primary production which provides (necessary) simplified approaches of GHPs (so in fact GAPs)

---

<sup>2</sup> <http://www.fao.org/docrep/012/i1134e/i1134e00.htm> , in particular the Chapter on Semi-quantitative risk characterisation might be relevant.

<sup>3</sup> ISBN 987-90-5989-275-0

is highly appreciated, but it is very unclear which GHPs are still considered relevant in the Sections 1 to 7 of the rest of the Chapter 1 in which primary production is sometimes referred to.

- The structure within Sections in the Chapter 1 is confusing and no consistent approach seems to be having taken.

### 3. Specific comments

#### Paragraphs 16-17

We repeat our comment made at CCFH49 to replace the 2 paragraphs on management commitment by paragraphs on food safety culture that could read as follows:

#### **"Food Safety Culture**

**16. Fundamental to the successful functioning of any food hygiene system is the establishment and maintenance of an appropriate food safety culture acknowledging the importance of human behaviour of all individuals in a business in providing safe and wholesome foods. Following elements are important in cultivating a positive food safety culture:**

- **Commitment of the management and all employees to the safe production of food**
- **Leadership to set the right direction and to engage all employees in food safety practices**
- **Risk awareness of the importance of food safety and hygiene by all employees in the business**
- **Open and clear communication between all employees in the business, including communication of deviations and expectations**
- **The availability of sufficient resources to ensure the safe and hygienic handling of food.**

**17. Management commitment should result in the continual improvement of the effectiveness of the food hygiene systems in place by:**

- **ensuring that roles and responsibilities are clearly communicated in the food business;**
- **maintaining the integrity of the food hygiene system when changes are planned and implemented;**
- **verifying that controls are working and documentation is up to date;**
- **ensuring the appropriate training and supervision are in place for personnel;**
- **ensuring compliance with relevant regulatory requirements."**

*Rationale:* Management commitment is only part of a food safety culture, which is a broader concept that is relatively new and therefore needs to be better described.

Other specific comments will be provided during the Working Group meeting on Sunday.

#### New Zealand

#### **General comments:**

In relation to the recommendations from the EWG outlined in Paragraph 10 (Page 2), New Zealand supports the concept of "enhanced GHPs" not being included in the revised document; rather that changes to the text are included to highlight as appropriate where GHPs may warrant additional attention.

**Question1: There has been mixed views about this table – views are requested on whether it is useful or whether it should be deleted.**

New Zealand supports removal of the table as it has insufficient context to convey the differences or similarities with clarity compared to using text in the following paragraphs. Also HACCP control measures infers controls at CCPs and therefore that all HACCP applications have one or more CCPs. This may not be the case and is confusing to the reader. Alternatively place at end as a summary document with consistent wording matching the text in document.

**Question 2: Are there any FAO/WHO programmes which can be referenced here?**

New Zealand suggests that a key document to be referenced here would be any relevant FAO/WHO documents relating to water quality and water usage in primary production.

**Question 3: Original text from CXC1 – 1969 has been moved to the section on water Is there agreement that this text fits here?**

New Zealand supports the removal of detailed advice on water into one section – on water. However the section on water needs further text to clarify the range of water use by food business operators across the food chain (see further comment below).

**Question 4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?**

Paragraph 43 currently has adequate wording including monitoring of temperature.

**Water notes: further development necessary considering FAO/WHO information pending****Definition of water pending****New Zealand supports Paragraph 75 as written**

What is the actual difference between clean water and potable water? Is it just about drinkability? Otherwise both should not compromise food safety or suitability.

New Zealand supports further development of the water section and also referencing specific commodity codes as appropriate in this section. Water is described in different ways throughout the document and this is confusing to the reader, should be reviewed in context in which it is being used and standardised. At present it is unclear whether potable water and clean water are intended to be equivalent terms or quite separate.

The key principle associated with water is that:

- Water should be used by the food business operator in a manner that does not compromise food safety and suitability of the food. Consideration should be given to the type of food and the point in the food chain where the water is being used.

Water may be treated to enable its use in many contexts, e.g. to supply potable water, recirculated water to a food business. The treatment process should not compromise food safety and suitability of the food.

**Question 5: Further discussion is required to determine that the word 'Sanitation' should be used or whether it should be defined. Would 'cleanliness' be suitable to use?**

New Zealand supports the use of 'cleanliness' over sanitation if that assists with translation. Note also paragraph 92 that is headed "Sanitation methods and procedures". Should that also be changed to 'Cleaning and disinfection methods and procedures'? This would certainly fit better with paragraphs 92 – 95.

**Question 6: Validation has been added to Principle 6 on Verification as the text includes a statement on Validation. What do members think?**

New Zealand supports Validation in the text of both Principle 3 and a re-worded Principle 6 as it is relevant to critical limits delivering a measurable and acceptable level of hazard in the food and may also apply to final product criteria (e.g. L.m acceptable level) or performance criteria (>7 log reduction Campy & Salmonella) achieved by the cooking process.

**Question 7: Decision tree**

New Zealand supports the inclusion of a decision tree but it does need further development to ensure no ambiguity. For example, the tree should cover each food hazard separately unless there is good reason to group hazards together (e.g. same control measure applying). Q3 should have 'significant' hazard as they are the only ones of concern that need to be brought to an acceptable level. All others will be under GHP control.

Q4 is superfluous and can be deleted as the intent of the tree is to take **each hazard** through the decision tree for **each step** of the process. Thus subsequent steps will be included in the decision process anyway.

Consideration should be given to steps which compliment others in achieving an acceptable level of hazard, (e.g. as observed in the canning process, can sealing – retorting). This could be flagged by a footnote on the decision tree.

**Question 8: This section has been retitled and includes additional text – are members content with the amendments?**

New Zealand supports Validation as text under the Section on Principle 3: Establishment of Critical Limits. See above in answer to Q 6. Therefore paragraph 170 should be deleted as this has been explained in other Codex text and can be referenced here for further clarity. Move Paragraph 171 to Principle 3.

### Hazard identification and analysis

Hazard identification and analysis is introduced under the **Introduction** to GHPs and **Control of Food Hazards**. Essentially this is part of Principle 1 of the HACCP application and should be at least cross-referenced as such.

Under HACCP Principles 1 and 2 (starting with Paragraph 152) this should be revised to solidify the link between GHP and HACCP. There is an expectation that the FBOs already have some understanding of the hazards as outlined in "Control of Food Hazards". The document then needs to provide a clear understanding that HACCP principle 1 and 2 can be applied to the extent possible and this may result in no CCPs if no significant hazards are identified. That means GHP procedures will be controlling the food hazards for that FBO.

The current document uses 'HACCP control measures' which means one or more CCP controls are present and this is confusing to the reader. New Zealand suggests change these to 'CCP control measures' and it then becomes obvious just what these control measure relate to.

### Definitions

**Good Hygienic Practices** should be defined. Suggested definition already in use by Codex, is:

All practices regarding the conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain.

**Significant hazard** should be revised to:

A hazard identified during hazard analysis that is likely to be present at an unacceptable level.

**Acceptable level** should be defined. Suggested definition would be:

A level of hazard validated as providing safe food, relative to the intended consumer (see Product Description).

### Specific comments on the draft text presented in Appendix 1:

Paragraph	Comment	Rationale
<b>INTRODUCTION</b> Para 1	<del>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.</del>	Delete as already in end of Para 2
Para 6	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).	<b>This statement implies that HACCP principles can only be applied if there are going to be CCPs.</b> However, the presence or absence of CCPs can only be established by applying the principles of HACCP.  In some cases, there will be no CCPs, but the logic used to determine this is clearly documented in the HACCP application.
Para 7	<del>The following comparison table shows the relationship of GHPs applied for food safety and suitability and HACCP control measures applied to enhance food safety.</del>	Delete last paragraph if comparison table is deleted
<b>Definitions</b> Reinstatement of current definition	<b><u>Cleaning – the removal of soil, food residue, dirt, grease or other objectionable matter.</u></b>	We suggest that this definition is retained from the current GPFH doc
<b>Definitions</b>	Flow Diagram: A systemic representation of the sequence of steps or operations used in the	The flow diagram should cover all steps in the food chain including



	production, <b><u>processing, storage and transportation</u></b> of a particular food item in the food chain.	storage and transportation as these parties also have responsibilities under the GPFH.  Use 'process' as this term is more inclusive than 'manufacturing' which indicates larger scale business.
<b>Definitions</b>  NEW definition following Prerequisite programme	<b><u>Primary Production means the growing, cultivation, picking, harvesting, collection or catching of food</u></b>	Suggest that Primary Production is a defined term to assist clarity.
<b>General Principles</b>  Para 15.	(iii) <del>Some GHPs require more attention than others, as they have a greater impact on food safety.</del>  (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 greater impact on food safety. Significant hazards not controlled by GHPs are controlled by specific control measures at CCPs.	These two points both deal with the same subject, GHPs with greater impact.  Suggest that point (iii) is deleted in favour of point (v)
<b>Equipment</b>  <b>Hygienic design and layout of food establishment [and equipment]</b>	<del>Equipment</del> <b><u>Hygienic design and layout of food establishment [and equipment]</u></b>	We support the amendment of the title to include <i>equipment</i> .  Remove square brackets and the extra 'Equipment' heading
<b>Para 35 last sentence</b>	They should be made of smooth, non-absorbent, materials unless food business operators can satisfy the competent authority that <b><u>the work surface does not compromise the safety of the food</u></b> <del>provided such deviation does not result in food safety being compromised</del>	Superfluous wording deleted
<b>Lighting Para 46</b>	Adequate natural or artificial lighting should be provided to enable the <b><u>food business</u></b> <del>undertaking</del> to operate in a hygienic manner. <del>Where necessary,</del> <b><u>Lighting should be such that it does not visibly affect the natural colour of the food</u></b> <del>be such that the resulting colour is misleading</del>	Consistent use of food business rather than undertaking.  Re-wording of second sentence to better explain effect on food appearance
<b>Food control and monitoring equipment</b> Para 51. Second sentence to new para 51bis	Where appropriate, equipment should be calibrated to ensure that food processes are monitored consistently and accurately.	This second sentence should be a separate paragraph as it is an important point that may be overlooked if left combined with para 51.

<p><b>Section 2: Control of Operation</b></p>	<p><b>OBJECTIVES:</b></p> <p><b>To produce food that is safe and suitable for human consumption by:</b></p> <ul style="list-style-type: none"> <li>formulating design requirements with respect to raw materials and other ingredients, composition/formulation, <b>production</b>, processing, distribution, and consumer use to be met <b><u>as appropriate to the food business across the food chain</u></b> <del>in the manufacture and handling of specific food items;</del></li> <li>designing, implementing, monitoring and reviewing effective control <b><u>systems as appropriate to the food business.</u></b></li> </ul> <p><b>RATIONALE:</b></p> <p><del>To reduce the risk of unsafe food by taking preventive measures to ensure the safety and suitability of food</del> <b><u>as appropriate to the food business operation and its position in the food chain</u></b> <del>in the operation by controlling food contaminants</del></p>	<p>Reword to cover the whole food chain as appropriate to the food business</p>
<p><b>Physical contamination</b> <b>Para 70</b></p>	<p>Systems should be in place throughout the food chain to prevent contamination of foods by extraneous materials, especially any hard or sharp object(s) e.g. glass, metal shards, bone(s), plastic, <del>insects</del>, wood fragments etc. that could cause injury or present a choking hazard</p>	<p>Delete insects as an example as this may be eaten as a source of food</p>
<p><b>Water</b></p>	<p><b>New material needed. FAO/WHO doc needed</b></p> <p>Allow for treated water to enable, not just recirculated water that may be treated.</p>	<p>Water may be treated to enable its safe and suitable use.</p> <p>Ensure that treated water is adequately mentioned not just in para 79</p>
<p><b>Para 83</b></p>	<p><b><u>Documentation should be appropriate to the size and nature of the food business.</u></b></p> <p>Appropriate records <b><u>for the food business operation</u></b> <del>of processing, production and distribution</del> should be kept and retained for a period that exceeds the shelf-life of the product or as determined by the competent authority. <del>Documentation can enhance the credibility and effectiveness of the food hygiene system and demonstrate that all reasonable care and due diligence have been taken to protect the health of consumers</del></p>	<p>Wording for documentation first then recordkeeping appropriate to supporting the documentation and according to the size and nature of the FBO</p>
<p><b>Para 84</b></p>	<p>Recall procedures should be documented, <del>and</del> maintained, and modified where necessary based on the findings of periodic field trials <del>etc.</del>.</p>	<p>Grammar early in the sentence needs correcting. Etc is meaningless.</p>

<b>3.1 Maintenance and cleaning</b>	<ul style="list-style-type: none"> <li>• Ensure appropriate maintenance?</li> </ul>	Delete question mark (?) after maintenance
<b>Prevention</b> <b>Para 103</b>	<b>Controls</b>	Para 103 is all about controls including preventing re-occurrence. The heading should reflect this
<b>Harbourage and infestation</b> Para 101.	Potential food sources should be stored in pest-proof containers and/or stacked above the ground and <b>preferably</b> away from walls.	Ideally items should not be stored directly against walls, however this is not always practical.
<b>Health Status</b> Para 107.	People known, or suspected to be suffering from or to be a carrier of a <del>[disease or illness]</del> [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	Delete disease or illness and leave 'communicable disease'
<b>Personal Behaviour</b> <b>Para 114</b>	114. People engaged in food handling activities should refrain from behaviour which could result in contamination of food, for example: <ul style="list-style-type: none"> <li>• smoking or vaping;</li> <li>• <b>wearing of artificial fragrance</b></li> <li>• spitting;</li> <li>• chewing, eating, or drinking;</li> <li>• touching the mouth, nose or other places of possible contamination; and</li> <li>• sneezing or coughing over unprotected food.</li> </ul>	Add in 'artificial' fragrance
<b>Awareness and responsibilities</b> <b>Para 126</b>	Food hygiene training is fundamentally important to the food business. All personnel should be aware of their role and responsibility in protecting food from contamination or deterioration. Food handlers should have the necessary knowledge and skills to enable them to handle food hygienically.  <b><u>Personnel</u></b> <del>Those who handle cleaning chemicals,</del> <b>e.g. cleaning chemicals and</b> other potentially hazardous chemicals should be instructed in safe handling techniques and <b><u>be aware of the potential to contaminate food</u></b>  <b><u>Personnel who carry out repairs and maintenance should be aware of potential physical hazards that could contaminate food</u></b>	New para for personnel handling chemicals and physical objects
<b>HACCP</b>		
Introduction Para 139.	Redesign of the operation should be considered if a [food safety] hazard is identified which is not controlled by the process.	Remove square brackets from food safety and include
<b>Flexibility for small and/or less developed food</b>	This flexibility should take into account the nature [and size] of the operation, including the human and financial resources, infrastructure, processes, knowledge and	Support the addition of <i>and size</i> to this paragraph. Remove square brackets

<b>businesses</b> Para 142.	practical constraints, as well as the risk associated with the produced food.	
Para 147	The scope should describe which segment of the food chain is involved and <b><u>specifically where the HACCP system begins and ends to ensure there are no gaps between preceding or subsequent processes.</u></b> <del>and</del> The general classes of hazards (biological, chemical, physical) to be addressed (e.g. does it cover all classes of hazards or only selected classes) <b><u>should also be described.</u></b>	There is often some confusion around where a business's responsibility begins and ends.
Para 150	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 <b><u>inputs the flows,</u></b> including those of—ingredients <b><u>and food contact materials</u></b> personnel, water and air	<b>Consideration</b> should be given to all inputs into the food being produced.
Para 152	The HACCP team should list all of the hazards reasonably likely to occur at each step according to the scope of the food business operation. <b><u>Hazards should be specific, e.g. Salmonella spp, and the source or reason for their presence should be described, e.g. from faecal matter on a cow's teat during milking.</u></b> <del>To identify potential hazards that may be associated with ingredients, "receiving" the ingredients can be considered as a the step.</del>	Simply stating, for example "pathogens" as a hazard does not allow for a measurable control to be implemented for the hazard. Therefore, specific hazards need to be described along with their source e.g. "Salmonella from faecal matter on the cow's teat during milking"  Not the only option for ingredients. Food safety hazards associated with ingredients also may be considered as they enter the process at a particular step.
<b>Para 154 second bullet</b>	<ul style="list-style-type: none"> <li>the likelihood and severity of adverse health effects associated with the hazards in the food, i.e. risk (footnote link)</li> </ul>	Gently introduce risk.
<b>Fourth bullet</b>	Delete as defined in defn of hazard and also covered by second bullet	Causes confusion and adds to duplication when really talking about risk – bullet 2
Para 157 , the last sentence	.....In other instances, control measures will need to be applied <b><u>within the process</u></b> <del>at or at</del> critical control points.	There may be process related controls that will not be at CCPs.
<b>Determine Critical Control Points Principle 2</b>	Not Principle 3	Change numbering of Principles
Para 159	Determining whether 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).	Diagram 2 is not in the document

## African Union

### Issue

The 49<sup>th</sup> Session of Codex Committee on Food Hygiene (CCFH49) agreed to establish an EWG, chaired by the United Kingdom and co-chaired by France, Ghana, India, Mexico and United States of America, working in English,

French and Spanish to: continue revision of the three parts of the document (Introduction, GHPs, HACCP) taking into account the discussions at CCFH49 and the written comments submitted; clarify the relationship of the three types of control measures: GHPs, control measures essential for safety that are applied at Critical Control Points (CCPs), and control measures essential for safety that are not applied at CCPs, using examples; and clarify how food business operators can come to understand the hazards associated with their business and determine the types of control measures needed to control the hazards.

#### **Position**

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.

#### **Issue**

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**

African Union recommends the use of the word **'should'** instead of **'need to'**.

#### **Rationale**

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.

#### **Issue**

Para. 7: Insertion of the phrases **"Chapter One"** and **"Chapter Two"** at the beginning of the 1<sup>st</sup> and 2<sup>nd</sup> sentences respectively.

#### **Position**

AU recommends the removal of square brackets in para.7.

#### **Rationale**

The proposed insertion of **"Chapter one"** and **"Chapter Two"** is in line with CCFH49 decision to have the two chapters in the text.

#### **Issue**

Is the table of comparison GHPs and HACCP useful?

#### **Position**

African Union is of the opinion that the table is useful.

#### **Rationale**

The comparison in the table addresses the concerns of CCFH49 on clarifying GHP and HACCP.

#### **Issue**

Para.7: Appropriateness of the location of the table on **"comparison of GHPs and HACCP"** in the introduction under para. 7.

#### **Position**

African Union recommends that the table be moved to the annex and referenced in para. 7 of the introduction for ease of reading.

#### **Issue**

Para. 9: Choice between the use of **"primary production"** or **'production'**

**Position:** AU 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”

#### **Rationale**

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.

#### **Issue**

The general principle in para. 15(iii) is repeated para.15 (v).

#### **Position**

AU recommends the deletion of the general principle in para. 15 (iii).

#### **Issue**

Para. 17: “**Potable Water**” is not defined in the document even though it has been used in the document e.g. in para. 38, 41, 75, 78 and 80.

#### **Position**

African Union recommends the inclusion of the definition of “**potable water**” in the section for “definitions” to ensure uniform understanding of the term.

#### **Issue**

Para. 17. Defines “**clean Water**” “as water that does not contain biological or chemical contaminants at a level that will not compromise the safety and suitability of the food”

#### **Position**

African Union recommends addition of “**physical contaminants**” as part of the hazards.

#### **Rationale**

Physical contaminants are part of physical hazards that can compromise the safety and suitability of clean water.

#### **Issue**

Para. 17: The inclusion of the term “**condition of**” the food as part of food hazards in the definition for a hazard.

#### **Position**

African Union recommends the deletion of the term “**or condition of**” from the definition of hazards.

**Rationale:** 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.

#### **Issue**

Para. 17: The inclusion of the definition for “**Review of Hazards**”

#### **Position**

African Union recommends to delete the term in square brackets.

#### **Rationale**

Review of hazards is part of an effective HACCP.

#### **Issue**

Para.27: The inclusion of on the term “**grace period**” in the sentence.

#### **Position**

African Union recommends the deletion of the phrase “**...and grace period**” so the sentence reads, “**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)***”.

#### **Rationale**

“**Withdrawal period**” is the standard terminology used.

#### **Issue**

Para. 31: Use of the term “**Equipment**” in the title of the section.

#### **Position**

African Union recommends the deletion of the 1<sup>st</sup> word “**Equipment**” and the Phrase “**...and Equipment**” in square brackets in the title to avoid repetition.

#### **Issue**

Para.37: Question 3. Relocation of the original text on water to the section on water in para.74

#### **Position**

African Union supports the relocation of the text as this is a logical arrangement to consolidate the requirements applicable to water.

**Issue:** Para. 40. The use of the term ‘*malicious*’ in the sentence.

#### **Position**

African Union 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:** 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**

African Union 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.***”

#### **Rationale**

Certain food require controlled environment for minimizing the growth and multiplication of microorganisms during production.

**Issue:** Para. 66: Reference to specific contamination levels.

**Position:** African Union recommends to delete the requirements on the contamination level of raw materials in the last sentence.

**Rationale:** The requirement indicated will depend on the type of microorganism, and therefore it is not recommended to include it in the text.

#### **Issue**

Para. 72: Reference to allergen guidance document

#### **Position**

African Union supports the inclusion of reference to allergen guidance.

#### **Rationale**

To enhance guidance on the management and control of allergens to ensure food safety.

#### **Issue**

Para. 73: Use of the term “**incoming raw materials**” as the title

**Position**

African Union recommends the title should read “**Raw materials**” instead of “**incoming raw materials**”

**Rationale:** To harmonize the text with the Codex format for writing standards

**Issue**

Para. 107: Use of either the term ‘**communicable disease**’ or “**disease or illness.**”

**Position**

AU recommends to use the word ‘**communicable disease**’ instead of “**disease or illness.**”

**Rationale**

The standard term used is “**communicable disease**” and not “**disease or illness.**”

**Issue**

Para: 132: Inclusion of the title “CHAPTER TWO”

**Position**

African Union recommends to remove the square brackets on “CHAPTER TWO”

**Rationale**

For clarity on the separation of the document into chapters in line with CCFH49 decision to have Chapter One for GHPs and Chapter Two for HACCP.

**Issue**

Para. 135: The inclusion of ‘validation’ in HACCP Principle 6

**Position:** African Union supports the inclusion of validation in HACCP Principle 6.

**Rationale:** Validation is applicable in the whole HACCP system and so is verification.

**Issue**

Para. 158: Question 7. Are members content with the decision tree?

**Position**

African Union is the opinion that the decision tree is useful and should be included in the text. However, AU recommends to replace “**high GHP control**” and “**GHP measures requiring level of control**” with “**GHP that require more attention**”. Furthermore, replace “**Pre-requisite Programmes**” with “**GHP**”.

**Rationale**

The decision tree is simplified and therefore provides easy guidance for identification of food hazards to be controlled through GHP and establishing critical control points. The use of the statement “GHP that require more attention” is more appropriate and easily understood.

**Issue**

Para. 171: Use of the word “**where possible**” in the 1<sup>st</sup> sentence to providing for optional validation of CCPs and HACCP Plan

**Position**

African Union recommends to delete the phrase “where possible” so that the sentence reads “~~Where possible,~~ Validation is performed during development of the HACCP plan.....”

**Rationale:** Validation is a critical component of HACCP plan and therefore should not be optional.

**Issue**

Para. 180: Targets for HACCP training.

**Position**



African Union recommends leaving the statement open without specifying the targets for HACCP training. The sentence should read, **“Training personnel in industry, government and academia in HACCP principles and applications is an essential element for the effective implementation of HACCP”**

**Rationale**

The requirement for training in HACCP should be flexible to include all parties that may need to be trained in HACCP.