

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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Comments from Indonesia

Proposed Draft Revision of The *General Principles of Food Hygiene* (CXC 1-1969) *General Principles of Food Hygiene: Good Hygiene Practices (GHPs)* and The *Hazard Analysis and Critical Control Point (HACCP) System*

Indonesia would like to thank Chair and Co-chair of the electronic working group for preparing the revision of the documents. The following are our comments for further consideration by the Committee:

General Comments:

The term “competent authority” throughout the document should be added with (ies) or foot note in the definition to reflect that “competent authority” refers to one or more competent authorities as mentioned in the Principles and Guidelines for Monitoring the Performance of National Food Control Systems (CXG91-2017).

Specific Comments:

Paragraph 4

Indonesia proposes to delete first two sentence as it is already clearly mentioned in last sentence of paragraph 2. Furthermore, we also propose to delete the sentence from “Ideally this would be determine....” until the end of the paragraph as it has mentioned in Principle 1 of HACCP. We propose to replace it with paragraph 6. Paragraph 4 should be read as follows

~~FBOs need to be aware of hazards that may affect their food. FBOs need to understand the consequences of these hazards for consumer health and should ensure that they are properly managed. Good Hygiene Practices (GHPs) are the foundation of any effective control of hazards associated with their businesses. For some FBOs effective implementation of GHPs will be sufficient to address food safety. Ideally this would be determined through conducting a hazard analysis and determining how to control identified hazards. However, not all FBOs have the expertise to do this. If the FBO is not able to conduct a hazard analysis, the FBO may rely on information on appropriate food safety practices from external sources such as that provided by competent authorities, academia or other competent bodies (e.g. trade associations or professional societies) that has been based on the identification of relevant hazards and controls. For example, requirements in regulations for production of safe food are based on hazard analyses conducted by competent authorities. Similarly, guidance documents from trade associations that describe food safety procedures are based on hazard analyses conducted by experts knowledgeable about the hazards and controls needed to ensure the safety of specific types of products.~~

In some circumstances, the implementation of GHPs may not be sufficient to ensure food safety due to the complexity of the food operation and/or specific hazards associated with the product or process, technological advances (e.g. extending shelf-life through modified atmosphere packaging) or end use of the product (e.g. products destined for a special dietary purpose). In such cases, when there are significant hazards identified through hazard analysis, Hazard Analysis and Critical Control Point (HACCP) principles should be applied.

Paragraph 5

Indonesia proposes to delete this paragraph

Rationale:

This paragraph is considered not necessary to state in the document as it has covered in combination paragraph 4 & paragraph 6 above

Paragraph 6

Indonesia proposed to insert this paragraph to paragraph 4 as mentioned above

Paragraph 9

Indonesia agrees with this paragraph with small revision by deleting the word “manufacturing”

This document provides a framework of general principles for producing safe and suitable food for consumption by outlining necessary hygiene and food safety controls to be implemented in production (including primary production), processing, ~~manufacturing~~, preparation, packaging, storage, distribution, retail, food service operation and transport of food, and where appropriate, specific food safety control measures at certain steps throughout the food chain.

Rationale:

We are of the opinion that the term processing is included manufacturing.

Paragraph 10

Indonesia proposes to revise the sentence to be:

The document is intended for use by FBOs (~~including primary producers, importers, manufacturers/processors, food warehouse/logistics operators, food service operators, retailers and traders~~) **throughout the food chain** and competent authorities, as appropriate. It provides basic information to meet the needs of food businesses, depending on the nature of product and size of food business, in the context of food trade. However, it should be noted that it is not possible for the document to provide specific guidance for all situations and specific types of food businesses and the nature and extent of food safety risks associated with individual circumstances

Rationale:

To ensure that any step throughout the food chain are included.

Paragraph 11

Indonesia proposes to replace the word “recommendations” with “requirements” so the sentence become:

There will be situations where some of the specific ~~recommendations~~ **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 ensure the safety and suitability of food for consumption?”

Rationale:

This document contains requirements not only recommendations.

Paragraph 21

Indonesia proposes to add a poin in this paragraph:

- control cross contamination and recontamination-prevent contact between raw and cooked food

Rationale:

Cross contamination and recontamination are often occured in food production

Paragraph 25

Indonesia proposes to delete this paragraph

Rationale:

Codex documents should be the main reference for FBOs so that it is not necessary for Codex to mention any production programmes as an additional resource. If Codex consider any production programme that is important part of primary production, then it should be included in this document.

Paragraph 28

Indonesia proposes to delete “(including natural fertilizer)” in the first bullet so the sentence become:

Producers should as far as practicable implement measures to:

- control contamination from soil, water, feedstuffs, fertilizers ~~(including natural fertilizers)~~, pesticides, veterinary drugs or any other agent used in primary production protect food sources from faecal and other contamination;
- ...

Rationale:

Fertilizer consists of natural and artificial fertilizer so it is not necessary to mention natural fertilizer.

Paragraph 37

Indonesia proposes to replace the “provided” with “accessible”, and to delete” where appropate” so the sentence should be read as follows:

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. Adequate facilities for toileting and washing hands should be ~~provided, where appropriate~~ accessible.

Rationale:

We are of the views that not all FBOs are able to adequate facilities for toileting and washing hands, but the important thing that such facilities must be accessible.

Paragraph 42

Indonesia proposes to replace “available” with “accessible” and to delete the phrase in the second bullet “ideally with tapsin place” until the end of this bullet point so the paragraph 42 become:

Adequate washing and toilet facilities should be ~~available~~ **accessible** so that an appropriate degree of personal hygiene can be maintained and to avoid personnel contaminating food. Such facilities

should be suitably located and should not be used for other purposes such as storage of food or items that contact food. They should include:

- adequate means of washing and drying hands, including soap (preferably liquid soap), wash basins and, where appropriate, a supply of hot and cold (or suitably temperature controlled) water;
- hand washing basins of an appropriate hygienic design, ~~ideally with taps not operated by hands; where this is not possible, appropriate measures to minimize contamination from the taps should be in place;~~ and
- suitable changing facilities for personnel

Rationale:

The same justification for replacement of “available” with “accessible” as mentioned in proposed revision of paragraph 37 above.

The phrase of “ideally with tapsin place” should be deleted as the term hygienic design is already clear.

Paragraph 89

Indonesia proposes small revision of this paragraph:

Personnel should maintain a high degree of personal cleanliness and, where appropriate, wear suitable protective clothing **such as** head and beard covering, and footwear. Measures should be implemented to prevent cross-contamination by personnel through adequate hand washing and, where necessary, the wearing of gloves. If gloves are worn, appropriate measures should be applied to ensure the gloves do not become a source of contamination

Rationale:

Adding such as before “head and beard covering, and foot wear” because these are the example of protective clothing.

Paragraph 91

Indonesia proposes to add “under running) before water so the sentence become:

In order not to contaminate food, personnel should wash hands with soap and **under running** water and rinse and dry them in a manner that does not recontaminate the hands. Hand sanitizers should not replace hand washing and should be used only after hands have been washed.

Rationale:

Washing hand should use soap and under running water for the effectiveness of preventing recontaminate the hands.

Paragraph 118

Indonesia proposes to delete the word “specific” in the last sentence of the paragraph so the sentence become:

....All food handlers should receive ~~specific~~ training related to allergen awareness and associated food manufacturing/processing practices and preventive measures to reduce the risk to allergic consumers.

Rationale:

To make it clear that training on allergen awareness can be a part or combine with another training in the same time, not only in the specific training.

Paragraph 129

Indonesia proposes to delete the last sentence of this paragraph.

Consumer education programmes should cover general food hygiene. Such programmes should enable consumers to understand the importance of any product label 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, cross contamination and foodborne illness, and of the presence of allergens. ~~Consumers should also be informed of the WHO 5 Keys for Safer Food and educated to apply appropriate food hygiene measures (e.g. proper hand washing, adequate storage and cooking and avoiding cross contamination) to ensure that their food is safe and suitable for consumption~~

Rationale:

We are of the opinion that WHO 5 Keys for Safer Food should be covered in food hygiene education programmes as mentioned in previous sentence.

Paragraph 145

Indonesia propose to replace the word “ongoing” with “continues”

The efficacy of any HACCP system will nevertheless rely on management and personnel having the appropriate HACCP knowledge and skills, therefore ~~ongoing~~ **continues** training is necessary for all levels of personnel, including managers, as appropriate to the food business.

Rationale:

The training must be conducted regularly and updated therefore “continues” is more appropriate whereas ongoing means being held.

Paragraph 148

Indonesia proposes small revision of this paragraph by adding the word “business” after food product so the sentence become:

The HACCP team should identify the scope of the HACCP system and applicable prerequisite programmes. The scope should describe which food products, **business**, and processes are covered.

Rationale:

The HACCP scope consist of product, processes and food business

Diagram 2 – Example of Hazard Analysis Worksheet

Indonesia proposes to provide guidance in Annex to determine the significance of the hazards to complement Diagram 2.