

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 5,6,7,8 and 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-First Session

Cleveland, Ohio, United States of America

Comments by the African Union (AU)

AGENDA ITEM No. 5: CX/FH19/56/1 PROPOSED DRAFT CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS

General Comment

The information provided in draft Code of Practice is acceptable. The document contains adequate guidance for the management of allergens along the food chain. African Union therefore supports the advancement of the CoP in the stepwise process.

Issue: The Role of Competent Authority in the identification of common national allergens. According to the draft the role of identifying allergens is left to the FBOs.

Position: African Union proposes to include the role of Competent Authority in identifying allergens that important in their countries. Further AU proposes to add the sentence of as follows: "competent authorities to identify list of recognized food allergens and criteria for food allergen." Either under section 2.1 "Scope" or section 2.2 "Use"

Rationale: Even though the draft guidelines are meant for FBOs the role of Competent Authority is important in establishing criteria and the development of the list for food allergens.

Issue: Hazard Characterization para 14 text in square bracket:

[In some instances, it may not be possible to prevent cross-contact, despite the implementation of preventive measures and GHPs, and in such situations, the application of a precautionary allergen statement such as "may contain" is substantiated. However, it may be possible to minimise cross-contact to an extent that the amount of allergen present due to cross-contact is below a threshold that would cause an adverse reaction in the majority of consumers allergic to the specific allergen. In these instances, the use of scientifically based threshold levels is a tool to evaluate risk for consumers with food allergies. Threshold levels can be used to reduce precautionary allergen labelling, in turn making precautionary labelling much more meaningful for consumers with food allergies.]

Position: African Union is of the opinion that there is need for precautionary labelling for food suspected to contain allergens pending the work on the development of the criteria for determination of allergen threshold limits being undertaken by JEMRA.

Rationale: No risk assessment has been conducted to support the development of thresholds for allergen.

AGENDA ITEM 6: CX/FH 19/51/5, PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CXC 1-1969) AND ITS HACCP ANNEX AT STEP 4

General comment

African Union thanks the Chair and co-chairs for leading the revision of CXC 1-1969. AU supports the reorganisation of the draft into chapters 1 (GHP) and 2 (HACCP) and welcomes the emphasis in the document that GHPs can be sufficient for some FBOs to produce safe food without necessarily applying HACCP.

Position on Issues raised under Summary of Discussion of the EWG

Issue-para 9: To maintain or delete the definitions for 'acceptable level', 'competent authority' and 'Food Business Operator'.

Position: African Union recommends that the definitions be maintained.

Rationale: The terms are used in the text and should therefore be defined to ensure uniform understanding.

Issue – para 9: To further clarify the difference between HACCP and HACCP Plan, the word 'System' has been added to 'HACCP' to emphasise that it is the implementation of the HACCP Plan.

Position: African Union supports the decision to clarify the difference between HACCP and HACCP Plan, as this is necessary to avoid any confusion in the use of the two terms.

Issue – para 10: Deletion the phrase 'condition of' in the definition of Hazard.

Position: AU supports the deletion of the term 'condition of' in the definition of hazard.

Rationale: The term condition is not easily understandable. Moreover, in current application of HACCP the term of "condition of" food is hardly used in hazard analysis. Furthermore it is difficult to provide a control measure for 'condition of' as hazard, however industry needs to be aware of it. As a consequential amendment to the definition of 'hazard' in the Codex Procedural Manual, AU supports the recommendation to refer the matter to CCGP to consider changing the definition of hazard in the Procedural Manual for harmonization with GPFH terminology".

Issue: Introduction para 4:

CCFH50 agreed on para 4 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 basis of any effective control of hazards associated with their businesses. For some FBOs effective implementation of GHPs will be sufficient to address food safety.”

However, the EWG made changes 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.”

Position: African Union recommends to retain the original text for para.4 as agreed at CCFH50.

Rationale: The amended text suggest that GHP cannot be sufficient to ensure safe food and contradicts the decision of CCFH50 relating to Para. 4. The implementation of GHP to provide safe food does not ideally require conducting Hazard analysis.

Issue – General Principles, Para.16: Exclusion of the term ‘Culture’ from the title “management commitment to food safety culture”

Position: African Union recommends retention of the term ‘culture’ in the title so that the title reads “Management Commitment and Food Safety Culture”

Rationale: The text in Para. 16 elaborates on the distinct roles of personnel and management in ensuring the establishment and maintenance of food safety culture. Since food safety culture is an important emerging concept in food safety management, it is appropriate that it is captured and its role recognised.

Issue - Definitions: Inclusion of the definition “food safety culture” in light of the proposed change in the title from “management Commitment to food safety” to “management commitment and food safety culture”

Position: African Union proposes the definition of “Food Safety culture” as “the attitude, values, norms beliefs and behaviours that a particular group of people share about food safety. It include visible and invisible attributes and is reflected in the actions of role players”

Rationale: The term “Food Safety culture” needs to be defined to provide uniform interpretation and understanding.

Issue – Definitions: Definition for FBO.

Position: African Union recommends the modification of the definition of FBO to read “A person or entity responsible for operating a business at any step in the food chain.”

Rationale: The current definition for FBO is narrow and must be expanded to include an entity, as is the case in the food laws in most jurisdictions.

COMMENTS ON CHAPTER ONE – GOOD HYGIENE PRACTICES

Issue – 3.2.1 Drainage and waste disposal facilities Para. 40, regarding the requirements for competences of personnel disposing hazardous waste.

Position: AU recommends the revision of the paragraph as follows: Hazardous waste should be disposed of by specially trained personnel. Containers used to hold hazardous substances prior to disposal should be identified and, where appropriate, be lockable to prevent intentional or accidental contamination of food.

Rationale: There should be a distinction between normal and hazardous waste. Hazardous waste generated in the food processing area poses high risk to the public if not handled appropriately. Hence the need for such personnel to be trained.

Issue – Health Status Para. 85: Health Status

Position: All food handlers should periodically undergo medical screening as appropriate to prevent contamination of food. Personnel known or suspected to be ill or carrying a disease likely to be transmitted through food should not 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.

Rationale: To ensure that food safety is not compromised through transmission of infectious pathogens from unhealthy food handlers to the food or food processing environment.

Issue – Control of Operation para.95.

The use of the term “food hygiene system” which implies the use of both GHP and HACCP to be applied where GHP may be sufficient.

Position: Since chapter (1) deals with GHP, AU proposes to replace “Food Hygiene System” with “Good Hygiene Practices”. The paragraph will read as follows:

Control of operation is achieved by having an appropriate food hygiene practices system in place. The following section describes practices that can assist in the identification and application of appropriate controls, as well as activities that should take place to ensure the operation is under control.

Rationale: Food Hygiene System is a combination of pre-requisite programmes and HACCP as per the definition. However GHP on its own can be used in the control of operation to ensure food safety.

Issue - Para. 105, use of the term “food hygiene system” in the title and text under section 7.2

Position: African Union recommends to revise the text in para 105 as follows:

Some key aspects of food hygiene system GHPs could be considered as control measures applied at CCPs in the HACCP system.

Rationale: Food Hygiene System implies the use of both GHP and HACCP. However, the section has been dedicated to GHPs hence this should be reflected appropriately in the text.

COMMENTS ON CHAPTER TWO – HACCP SYSTEM AND GUIDELINES FOR ITS APPLICATION

Issue – Section 1: Principles of HACCP System – Principle 6. The inclusion of validation in HACCP Principle 6

Position: African Union supports the inclusion of validation in HACCP Principle 6 to read as follows: Conduct validation and establish procedures for verification to confirm that the HACCP system is working effectively.

Rationale: Validation is applicable in the whole HACCP system just like verification.

Issue - para. 141 Inclusion of “control measure” in

Position: African Union recommends the inclusion of the phrase “control measure” in para 141. The sentence should read as follows: A HACCP approach should be customized to each food business. Hazards, CCPs, critical limits, CCP monitoring, control measure, CCP corrective actions and verification activities can be distinctive for a particular situation and those identified for a specific application or might be of a different nature.

Rationale: To emphasize that “control measures” applied by different FBOs may be distinctive depending on the operations of the FBO.

Issue - Para. 143. Flexibility for small and/or less developed food businesses

Position: To aid in the utility of the document, AU recommends the inclusion of other examples of activities that can be considered as “flexible” apart from documentation.

Issue – Section 8, 8.2 Product Information para 127

Position: African Union recommends replacement of the term “person/FBO” with the term “next user or consumer in the food chain”. The text will now read as follows:

All food products should be accompanied by or bear adequate information to enable the next person/FBO next user and consumer in the food chain to handle, prepare, display, store, and/or use the product safely and correctly. Information for FBOs should be clearly distinguishable from consumer information, particularly on food labels.

Rationale: For consistency with paragraph 150 and uniform interpretation.

Issue: Proposed comparison of GHPs and control measures at CCPs with examples (Annex 1, page 34)

Position: African Union supports the table in Annex 1 as it will help in the better understanding and implementation of the requirements in the document.

AGENDA ITEM 7: CX/FH 19/51/7, PROPOSED DRAFT GUIDELINES FOR MANAGEMENT OF BIOLOGICAL OUTBREAKS AT STEP 4

Issue: Conclusions of the EWG, Para 12 bullet 1 and 2

Position for bullet 1: African Union recommends to keep the text and refer to the templates in WHO "Foodborne Disease Outbreaks: Guidelines for investigation and Controls, as example and incorporate them as Annex in the guidelines.

Rationale: The existing template in WHO "Foodborne Disease Outbreaks: Guidelines for investigation and Controls sufficiently provides the relevant information but need to be consolidated in one document.

Position for bullet 2: African Union supports the recommendation to elaborate an example of a template for asking a rapid risk assessment as an annex to the guideline. This will facilitate implementation of rapid risk assessment.

Position for Bullet 3: African Union supports the inclusion of the graphical structure of the network described in the text and placing it in an annex. This will enhance on the key elements to be considered when establishing networks at national and international levels.

Issue - Definitions Para. 16, the definition of Biological hazards i.e. "Biological hazards": agents including microorganisms that have the capacity to cause harmful effects in humans."

Position: African Union seeks clarification whether "biological hazards" include metabolites of microorganism such as biotoxin.

Rationale: The definition provided seem to suggest that there may be other agents apart from microorganisms.

AGENDA ITEM 8: CX/FH 19/51/7, PROPOSED DRAFT GUIDELINES FOR CONTROL OF SHIGA TOXIN-PRODUCING ESCHERISHIA COLI (STEC) IN BEEF, RAW MILK AND CHEESE PRODUCED FROM RAW MILK, LEAFY VEGETABLES AND SPROUTS AT STEP 4

Issue – Definition of raw milk

Position: African Union recommends to change the definition to read “Milk which has not been pasteurized by heating beyond 40°C or undergone any other treatment that has an equivalent effect to reduce pathogens to an acceptable level.

Rationale: The requirement for pasteurization by heating beyond 40°C is unclear and does not meet the standard condition for pasteurization.

Issue: Para.11. The second sentence incorporates the term ‘sound’ which is subjective.

Position: African Union recommends the rephrasing of the sentence to read as follows “the guideline provides a scientific tool for scientifically sound international tool for robust application of GHP and hazard-based approach” for control national risk management decisions.

Rationale: All Codex standards and related texts are based on sound international tool for robust application and does not need to be emphasized in the document.

Issue: Par. 35 bullet 2, last sentence

Position: African Union recommends the deletion of the last sentence in para 35 as follows:

Identification of any existing food safety outcome or target, established by the competent authority or industry. Industry may set stricter targets than those set by the competent authority.

Rationale: “Targets” have already been addressed in the first sentence of para 35. The last sentence is a duplication and should be deleted.

Issue - : Para.4 Annex 1, Definitions, the use of the term “meat preparations”

Position: African Union recommends the inclusion of the word “Raw” in the term “Meat preparation” to read “raw meat preparation”

Rationale: The “meat preparation” referred to in the text should rather be “raw meat preparation”

Issue – Annex 2: The use of the terms “fresh leafy green vegetables” “leafy greens” and “leafy green vegetable”

Position: African Union supports the use of the term “fresh leafy green vegetables” rather than “leafy greens” and “leafy green vegetable” as proposed by the Chairs of EWG

Rationale: The term is more descriptive of the products of concern.

Issue - Other terms that need to be included in the draft guidelines as definitions.

Position: African Union proposes the inclusion of the definition of “Fresh Leafy Green Vegetables”

Rationale: For uniform interpretation and understanding of the guidelines.

AGENDA ITEM 9: CX/FH/19/51/9, DISCUSSION PAPER ON THE PRINCIPLES FOR SAFE USE OF WATER IN FOOD PROCESSING

General Comment

African Union supports the development of the guidelines for the safe use and reuse of water in food production. Water is an essential commodity in food production and processing. Judicious use of safe and quality water is critical to ensure public health and sustainability of food production. It is therefore important that guidelines are developed to cover its judicious sourcing, use and reuse in the food production. AU further supports the use of Risk-based approaches and assessment of the fitness of the water for the purpose such as decision support system. Furthermore, AU supports the requests for JEMRA to develop examples of microbiological criteria for water sourcing, use and reuse in food processing.

Issue: Whether to develop principles or guidelines for the safe use and reuse of water in food production

Position: African Union recommends the use of the term ‘guidelines’ rather than ‘principles’

Rationale: “Guidelines” will provide direction to action or behaviour in the sourcing, safe use and reuse of water.

Issue: Whether the structure as proposed by the EWG is appropriate where the guidelines will have a General guidance document for the safe sourcing, use and reuse of water in food processing and a sector-specific annexe with fresh produce and fishery sectors as priority.

Position: AU supports EWG proposed structure of the draft guidelines

Rationale: The structure will provide for general guidelines and specific guidelines to cover specific situation of the use of water and other situations where guidelines are yet to be developed.