

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

CX/FH 19/51/6-Add.2

October 2019

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-first Session

Cleveland, Ohio, United States of America, 4 - 8 November 2019

PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CXC 1-1969) AND ITS HACCP ANNEX

Comments at Step 3 in reply to CL 2019/70 -FH

Comments of Ecuador, European Union, Ghana, Nigeria, Senegal, Tanzania, East African Community and Economic Community of West African States (ECOWAS)

Ecuador

(i) Comentarios generales:

Ecuador agradece la propuesta realizada por el Grupo de trabajo por medios electrónicos y una vez revisado el ANTEPROYECTO DE REVISIÓN DE LOS PRINCIPIOS GENERALES DE HIGIENE DE LOS ALIMENTOS (CXC 1-1969) Y SU ANEXO SOBRE EL ANÁLISIS DE PELIGROS Y DE PUNTOS CRÍTICOS DE CONTROL (HACCP), considera apoyar el documento, tomando en consideración los siguientes aspectos:

(ii) Observaciones específicas:

TEXTO DEL ANTEPROYECTO:

1. Numeral 14, segundo ítem que textualmente señala: *“Garantizar que el personal está convenientemente capacitado para desempeñar las actividades correspondientes a su puesto;...”*

SUGERENCIA:

Reemplazar el término *“convenientemente”* por **“suficientemente”**

TEXTO DEL ANTEPROYECTO:

2. Numeral 51. *“El equipo y los recipientes que vayan a estar en contacto con los alimentos deberían ser aptos para estar en contacto con los alimentos, estar diseñados, fabricados y ubicados de manera que se puedan limpiar adecuadamente (excepto los recipientes de un solo uso) y, de ser necesario se puedan desinfectar, y mantener o descartar, según corresponda, para evitar la contaminación de los alimentos, de conformidad con principios de diseño higiénicos”.*

SUGERENCIA:

Colocar a continuación de la frase *“...en contacto con los alimentos”* los términos entre paréntesis (*grado alimentario*); así como también reemplazar el término *“deberían”* por el término **“debe”**.

TEXTO DEL ANTEPROYECTO:

3. Numeral 55. *“La capacitación en higiene de los alimentos es fundamental para el sector alimentario. Todo el personal debería tener conocimiento de su función y responsabilidad en cuanto a la protección de los alimentos contra la contaminación o el deterioro. El personal debería contar con los conocimientos y capacidades necesarios para poder manipular los alimentos en condiciones higiénicas. Se debería enseñar el uso adecuado al personal que manipule productos químicos de limpieza u otras sustancias químicas potencialmente peligrosas para evitar la contaminación de los alimentos”.*

SUGERENCIA:

Reemplazar todos los términos *“deberían”* por el término **“debe”**.

TEXTO DEL ANTEPROYECTO:

4. Numeral 64. *“Se debería prestar atención a la higiene durante las actividades de limpieza y mantenimiento, de modo que no se comprometa la inocuidad y la idoneidad de los alimentos. En las zonas de preparación de alimentos se deberían utilizar productos de limpieza adecuados para superficies que entran en contacto con los alimentos”.*

SUGERENCIA:

En la tercera línea a continuación de los términos “*limpieza adecuada*”, colocar entre paréntesis los términos “**grado alimentario**”.

TEXTO DEL ANTEPROYECTO:

5. Numeral 77. *“... Siempre que sea posible, se impedirá la entrada de animales en los establecimientos de elaboración de alimentos”.*

SUGERENCIA:

Reemplazar la frase “*siempre que sea posible, se impedirá...*” por la frase “**Se debe impedir**”

TEXTO DEL ANTEPROYECTO:

6. Numeral 93. *“En las zonas de manipulación de alimentos no se deberían llevar puestos o introducir efectos personales tales como joyas, relojes, alfileres u otros objetos, como uñas o pestañas postizas, si constituyen una amenaza para la inocuidad e idoneidad de los alimentos”.*

SUGERENCIA:

Reemplazar el término “*debería*” por el término “**debe**”.

TEXTO DEL ANTEPROYECTO:

7. Numeral 120. *“El diseño y los materiales de envasado deberían ser inocuos y aptos para uso alimentario, ofrecer una protección adecuada de los productos para reducir al mínimo la contaminación, evitar daños y permitir un etiquetado correcto. Cuando se utilicen materiales o gases para el envasado, estos no deberían contener contaminantes tóxicos ni representar una amenaza para la inocuidad y la idoneidad de los alimentos en las condiciones de almacenamiento y uso especificadas. Todo material de envasado reutilizable debería tener una duración adecuada, ser fácil de limpiar y, en caso necesario, de desinfectar”.*

SUGERENCIA:

Reemplazar todos los términos “*deberían*” por el término “**debe**”.

TEXTO DEL ANTEPROYECTO:

8. Numeral 121. *“El agua, así como el hielo y el vapor de agua, deberían ser aptos para su uso previsto según un enfoque basado en el riesgo [aquí añadiríamos la nota a pie de página al informe de la FAO/OMS cuando esté disponible]. No deberían causar contaminación de los alimentos. El agua y el hielo deberían almacenarse y manipularse de manera que no se contaminen, y la generación de vapor que entre en contacto con los alimentos no debería dar lugar a su contaminación. El agua que no es apta para el uso en contacto con los alimentos (por ejemplo, el agua para el control de incendios y para el vapor que no entra en contacto directo con los alimentos) debe tener un sistema separado que no se conecte con el sistema para el agua que entra en contacto con los alimentos y que no permita el reflujo hacia este último. El agua recirculada para su reutilización y el agua recuperada de la elaboración de alimentos por evaporación debería tratarse cuando sea necesario para asegurar que el agua no comprometa la inocuidad e idoneidad de los alimentos.] “*

SUGERENCIA:

Reemplazar todos los términos “*deberían*” por el término “**debe**”.

TEXTO DEL ANTEPROYECTO:

9. Numeral 123. *“...Se debería considerar la necesidad de emitir alertas públicas y de informar a la autoridad competente cuando el producto haya llegado a los consumidores y cuando sea aconsejable la devolución del producto al OEA. Los procedimientos para retirar alimentos se deberían documentar, mantener y modificar cuando sea necesario, a partir de los resultados de ensayos de campo periódicos”.*

SUGERENCIA:

Reemplazar todos los términos “*deberían*” por el término “**debe**”.

TEXTO DEL ANTEPROYECTO:

Numeral 91, “*Para no contaminar los alimentos, el personal debería lavarse las manos con agua y jabón y enjuagárselas y secárselas de manera que no se vuelvan a contaminar. Los desinfectantes de manos no deberían reemplazar al lavado de manos y solo deberían usarse después de dicho lavado*”.

SUGERENCIA:

Enmendar el primer párrafo del numeral 91 quedando de la siguiente manera:

“Para no contaminar los alimentos, el personal debe lavarse las manos con agua y jabón y enjuagarlas y secarlas con una toalla de papel de un solo uso. Los desinfectantes de manos no deben reemplazar al lavado de manos y solo deben usarse después de dicho lavado”.

European Union

The European Union and its MS (EUMS) would like to thank and congratulate United Kingdom, France, Ghana, India, Mexico and the United States of America for the development of these draft guidelines. Substantial progress has clearly been made.

The EUMS would like to make the following comments:**General comment**

Several specific Codex Guidelines (e.g. on *Salmonella*, STEC, ...) refer to GHP-based, Hazard-based and risk-based control measures, which seems to be related to good hygiene practices and HACCP. However such control measures are not referred to in this draft. The link between these different control measures/terminology should be clarified to better link the general principles with specific guidelines.

The EUMS suggest to replace “to minimize contamination” by “to **prevent or** minimize contamination” throughout the text. It is considered that it is more appropriate as the purpose of the hygiene principles is to provide safe and suitable food for the consumers.

Specific comments

- Paragraph 3: The following change is proposed to the second sentence: “Taking into account the stage in the food chain, the nature of the product, **the intended use of the consumer, the targeted consumer group,** the relevant contaminants, and whether the relevant contaminants adversely affect safety,...”

Rationale: for completeness.

- Paragraph 4 to 7: These paragraphs contain key guidelines for the general principles. Although their content can be largely supported, it is strange to find them that elaborated in the introduction. They should be shorted or deleted in the introduction and put in a separate Section e.g. after the definitions, explaining the link between Chapter One (Good Hygiene Practices) and Two (HACCP).
- Paragraph 4: In addition to the previous comment, the following changes are proposed: "... For some FBOs effective implementation of GHPs will be sufficient to address food safety. ~~Ideally,~~ **This would may** be determined through conducting a hazard analysis and determining how to control identified hazards... ...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 internal or external risk assessment bodies recognised by** experts knowledgeable about the hazards and controls needed to ensure the safety of specific types of products. **When external generic guidelines are used, the FBO shall in any case verify if such guidelines fully correspond with all activities in his/her specific establishment and adapt where needed.**"

Rationale: Editorial as “ideally” is a strange wording in this context. The second change accounts for systems that have separate Risk Assessment (RA) organisations like EFSA and others that have internal RA within the CA. In addition, the EUMS recognised that not all FBO can do the hazard analysis themselves and make use of external expertise or general external guidelines. Good hygiene practices and procedures based on the HACCP principles must however be adapted to the work flow in each specific establishment.

- Paragraph 12: The following change is proposed on the second sentence: "In deciding whether a requirement is necessary or appropriate, an evaluation **of the likelihood and severity of the hazard, thus establishing** the potential harmful effects to consumers should be made, taking into account any relevant knowledge of the operation and hazards, including available scientific information."

Rationale: for completeness.

- Paragraph 13: It is proposed to delete the third bullet.

Rationale: This is a consequence of the other three bullets rather than an aim in itself.

- Paragraph 13: the following additional bullet is proposed: "**Verify the implementation of GHPs and HACCP principle as developed by FBOs**"
- Paragraph 14, fifth bullet: The following change is proposed: "... and prevent the **introduction /growth/survival of foodborne pathogens by storing,...**"

Rationale: For completeness

- GENERAL PRINCIPLES

- (vii): The following change is proposed: "Food hygiene systems should be reviewed to determine if modifications are needed. This should be done periodically and whenever there is a significant change **in the process or processing environment** that could impact the potential hazards and/or the control measures (e.g. new process, new ingredient, new product, new equipment) associated with the food business, **new scientific knowledge or new legislation.**"

Rationale: For completeness.

- A new bullet (ix) is proposed: "**(ix) Ensure adequate documentation and records appropriate to the size and nature of the food business and ensure that they are kept for a certain minimum period.**"

Rationale: to be added for completeness but it is essential that flexibility is addressed/highlighted.

(Note that numbering is missing)

- DEFINITIONS:

- "Contaminant" versus "hazard": the difference is unclear to the EUMS and seems to suggest that "hazards" are intentionally added (only difference with "contaminant"), which is not correct. The words seem alternatively used throughout the text within the same sense. One single wording is proposed being "hazard".
- Competent Authority: The following change is proposed: "The official body authorized by the government **that is responsible with the control of food hygiene, including for the setting and enforcing of regulatory food safety requirements and for the organisation of official controls including enforcement.**"
- Critical control point: The following change is proposed: "Critical Control Point (CCP): A step at which a control measure or measures, essential to control a significant hazard **by preventing, eliminating or reducing it to an acceptable level,** is/are applied in a HACCP system."

Rationale: For completeness and to better align with current definition.

- Paragraph 19: It is proposed to replace "should" by "could".

Rationale: this is optional.

- Paragraph 21: The following change is proposed: "... is sufficient to manage **only** some or all of the hazards ..."

Rationale: clarification.

- Paragraph 22: The following change is proposed: "After consideration of the conditions and activities in the business, it may be determined that GHPs alone may be sufficient to manage the hazards, **as provided for in Paragraph 4**" (or wherever this paragraph ends up).

Rationale: a cross reference to Paragraph 4 seems relevant here since this paragraph explains when GHPs alone may be sufficient.

- Paragraph 26: The following change is proposed: "... which could taint foodstuffs or near sources of contaminated water such as **emission of waste water from industrial production or** runoff from agricultural land with high faecal material or ..."

Rationale: completeness/clarification.

- Paragraph 32: The following change is proposed: " ... that cross-contamination is **prevented or** minimized ~~or prevented.~~"

Rationale: to highlight better prevention.

- Paragraph 33: The following change is proposed: "... such as physical separation (e.g. walls, partitions) and/or location (e.g. distance), traffic flow (e.g. one-directional production flow **and flow of personnel**), airflow, and separation in time, with suitable cleaning and disinfection between uses."

Rationale: Completeness.

- Section 4 (of Chapter One): It is unclear why this paragraph is inserted here. It should be moved to the end of Chapter One since training and competence seem relevant for all Sections.

- Paragraph 56, first bullet: The following change is proposed: "the nature and hazards associated with the food, e.g. its ability to sustain growth of pathogenic or spoilage microorganisms, the existence of potential ~~physical~~ contaminants or known allergens;"

Rationale: Contaminants include biological, chemical and physical agents by the definition. No need to limit here to physical ones.

- Paragraph 57, third bullet: "The Following change is proposed: "the importance of good personal hygiene, including proper hand washing **and when appropriate adequate clothing**, for food safety;"

Rationale: Completeness.

- Paragraph 64: The following change is proposed: "... Cleaning products suitable for food contact surfaces should be used in food preparation **and storage** areas."

Rationale: Completeness.

- Paragraph 65: The following change is proposed: "... separated from food, in clearly **labelled and** identifiable ~~able~~ containers to avoid contamination of food."

Rationale: Completeness.

- Paragraph 83: The following change is proposed: "Waste storage areas **should be easily identifiable and** should be kept appropriately clean and be resistant to pest infestation. They should also be located away from processing areas."

Rationale: Completeness.

- Paragraph 97, fourth bullet: An example would be useful to clarify what is meant by this point.

- Before paragraph 101: An additional heading "**7.1.5 Corrective Action**" seems appropriate.

- Paragraph 101: An additional bullet point is proposed: "**Identify the cause that determine the non compliance;**"

Rationale: only if we are able to identify the source of the non compliance we might be able to avoid the recurrence. Consistency with paragraph 173.

- Paragraph 121: The EUMS propose to keep the Paragraph 121 on water as it is.

- Paragraph 123, last but one sentence: The following changes are proposed: "The ~~need for~~ Public warnings and reporting to the relevant competent authority should be ~~considered~~ **required** where product may have been reached consumers and when return of product to the FBO or **removal from the market** is **appropriate** ~~advisable.~~"

Rationale: It should be an obligation for FBO to contact the competent authority without delay in order to guarantee the safety of public health. Furthermore the operator often does not have the knowledge (smaller operators) to estimate the risk correctly. Also the withdrawal from the market / recall is not always properly followed up by the following steps in the chain. Only the competent authority is authorized to enforce a correct follow-up and to sanction if instructions are not followed.

- Paragraph 133: An additional sentence is proposed at the end of the paragraph: “**Some non-foods should not be transported with a conveyance or container used for foodstuffs (e.g. transporting gasoline in a milk tanker).**”

Rationale: Some non-foods create a high food safety risk for cross-contamination of food under any condition of transport with the same means. The EUMS suggest to provide more specifications to the paragraph.

- Paragraph 137: very repetitive with Paragraph 144. Considering the importance of flexibility, the paragraph 144 in the dedicated section 2.2, should be maintained and Paragraph 137 deleted.
- Chapter 2, Section 1, Principle 3: the EUMS support this principle as explained by the co-chairs in paragraph 15 of their report on the eWG.
- Paragraph 139: very repetitive with Paragraph 145. One of them could be deleted (no preference).
- Paragraph 144, last sentence: The following change is proposed: “The FBO is ultimately responsible for **the elaboration and implementation of** the HACCP system and the production of safe food.”

Rationale: Clarification.

- Paragraph 151: An additional bullet is proposed, reading: “**Flow of personnel**”

Rationale: Completeness.

- Paragraph 155, seventh bullet: The following change is proposed: “the intended use and/or **if appropriate and feasible** probability of product mishandling by potential consumers that could render the food unsafe; and,”

Rationale: Clarification.

- Paragraph 156: The following change is proposed: “The hazard analysis should consider not only the intended use, but **if feasible** also any **to the FBO** known unintended use ...”

Rationale: Clarification.

- Paragraph 170: The following amendment is proposed: “All records and documents associated with monitoring CCPs should be signed or initialed by the person performing the monitoring **and should also report data and timing of the performed activity.**”

Rationale: report data and time could be useful to contain a possible non compliance and define with more accuracy the activity performed

- Paragraph 172: It is proposed to replace “analysing” by “evaluating”.

Rationale: Clarification.

- Paragraph 173: The following change is proposed: “External experts may be needed to conduct evaluations ~~of the safety of~~ **regarding the safe use of** products when a deviation occurs. ~~In some cases, the evaluation may indicate that the product is safe and can be released. In other cases, It may be determined ...”~~

Rationale: If a validated critical limit is set correctly then failure of that critical limit means the product is unsafe and will need further processing to render it safe. So the issue here is more about expert advice on safe use of affected product because the product is unsafe. The phrase suggesting that an expert could determine a food is safe after failure of a critical limit could be misused or misinterpreted e.g. a micro test performed and found negative leading to release. This sentence should be deleted.

- Paragraph 182, fourth bullet: The following change is proposed: “critical limit determination and the scientific, **empirical or legislative** support for the limits set;”

Rationale: Completeness.

Ghana

COMMENTS FROM THE SUMMARY OF DISCUSSIONS

Para 9: Proposals to delete definitions for ‘acceptable level’, ‘competent authority’ and ‘Food Business Operator’

Position: Ghana recommends that the definitions be maintained.

Rationale: This would ensure uniform in understanding since the terms are used in the text.

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: Ghana 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.

Para 10: Support for the deletion the phrase 'condition of' in the definition of Hazard which has been reflected in the draft. In line with paragraph 15 of discussion paper CX/FH 15/47/9 at CCFH47,

Position: Ghana supports the deletion of the phrase 'condition of' in the definition of hazard.

Rationale: The phrase "condition of" is hardly used in the current application of HACCP in hazard analysis. It is also difficult to provide a control measure for condition of as hazard. Industry however needs to be aware of it and as a consequential amendment to the definition of 'hazard' in the Codex Procedural Manual, Ghana 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".

COMMENTS FROM APPENDIX 1

Para 4: Introduction

Position: Ghana agrees to the retention of 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.

Para 16: Exclusion of the term 'Culture' from the title "management commitment to food safety culture"

Position: Ghana 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.

DEFINITIONS

Definition for FBO.

Position: Ghana 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.

Para. 85: Health Status

Position: Include the phrase "All food handlers should periodically undergo medical screening where necessary to prevent contamination of food" for sentence to read "**All food handlers should periodically undergo medical screening where necessary 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: This would ensure that food safety is not compromised through transmission of infectious pathogens from unhealthy food handlers to the food or food processing environment.

Para 95: Control of Operation

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: Ghana recommends the replacement of "Food Hygiene System" with "Good Hygiene Practices" since chapter (1) deals with GHP. The paragraph will then 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.

Para. 105: Use of the phrase "food hygiene system" in the title and text under section 7.2

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

Some key aspects of **requiring special attention** food hygiene system 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

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

Position: Ghana supports the inclusion of validation in HACCP Principle 6 to read as follows: Establish **validation and procedures for verification procedures** to confirm that the HACCP system is working effectively.

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

Para 141: Inclusion of “control measure” in the sentence.

Position: Ghana 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: This would emphasize that “control measures” applied by different FBOs may be distinctive depending on the operations of the FBO.

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

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

Section 8, 8.2 Product Information para 127

Position: Ghana 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/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.

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

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

Nigeria

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: Nigeria supports that the definitions be maintained for the texts

Rationale: The terms were mentioned in the text of the document and therefore need to be clearly defined.

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

Position: Nigeria proposes that the word “System” be maintained to clearly differentiate HACCP from HACCP Plan.

Rationale: The word “System” is broader, as HACCP is practiced alongside other Food Safety activities and programs. The word “system” has also been used in other Codex texts

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

Position: Nigeria recommends that the term ‘**condition of**’ in the definition of hazard be deleted and definition of hazard be reviewed by the Codex Committee on General Principles (CCGP).

Rationale: The term “condition of” is subjective. Nigeria supports the recommendation to refer the matter to CCGP to consider reviewing for better understanding and clarity.

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: Nigeria supports the expanded definition proposed by the EWG which provides avenues for FBOs to mitigate the inability, in some cases, to conduct a hazard analysis.

Rationale: The amended text accommodates the context of some FBOs and would be more beneficial for their development.

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

Position: To avoid ambiguity, Nigeria proposes the exclusion of the term ‘**culture**’ in the title so that the title reads “**Management Commitment and Food Safety**”

Rationale: Currently, within the context of Codex, **culture** is not defined, thus subject to several interpretations.

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: Nigeria supports the revision of the paragraph as follows: **Hazardous waste should be disposed 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: Nigeria proposes the replacement of “Food Hygiene System” with “Good Hygiene Practices”. The paragraph will read as follows:

Control of operation is achieved by having appropriate good 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: Nigeria 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: Nigeria suggests the deletion of **conduct validation**

Rationale: Validation is part of the verification process

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

Position: Nigeria does not support 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: “control measures” are already established in the pre requisite programs before HACCP

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

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

Issue – Section 8, 8.2 Product Information para 127

Position: Nigeria recommends the use of the term “next user or consumer” rather than “next person/FBO” in the paragraph. 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 or consumer** in the food chain to handle, prepare, display, store, and/or use the product safely and correctly.

Rationale: All Information should be clearly distinct to target audience, particularly on food labels 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: Nigeria supports the table in Annex 1 as it will help better understanding and implementation of the requirements in the document.

Senegal

Contexte : Le Sénégal remercie le président et les coprésidents d’avoir dirigé la révision du document CXC 1-1969. Nous soutenons la réorganisation du projet en chapitres 1 (GHP) et 2 (HACCP) et nous félicitons de l’accent mis dans le document sur le fait que les BPH peuvent suffire à certains Exploitants du Secteur Alimentaire pour produire des aliments salubres sans nécessairement appliquer le système HACCP.

Position : Le Sénégal propose que les définitions sur "niveau acceptable", "autorité compétente" et "exploitant du secteur alimentaire". Soient maintenues dans le document et la partie définitions soit revue conformément à la norme ISO 22000 :2018 dans son chapitre « Termes et définitions » (ajout d’autres définitions pertinentes)

Justification : Les termes sont utilisés dans le texte et doivent donc être définis en se conformant à ISO 22000 :2018 pour assurer une même compréhension par tous les acteurs impliqués

Tanzania

The United republic of Tanzania reviewed the proposed draft and commented as below:-

-Para 10: Change subtitle from “USE” to “APPLICATION” in line with Codex procedural manual

JUSTIFICATION

Replace ‘use ‘ with ‘application’ considering that its consistently used in other codex texts. - -Insert a new Para 85 bis to read as follows “Personnel working in food establishments should be medically examined prior to employment and periodically in line with the relevant national public health regulations”.

-Para 107: Replace “aw” with “a_w” for water activity throughout the document.

-Para 121: should be restructured to provide clarity on the application/use of water in during processing as follows;

121.a Water, as well as ice and steam made from water, should be fit for its intended purpose based on a risk-based approach [here we would add the footnote to the FAO/WHO report when it is available]. They should not cause contamination of food. Water and ice should be stored and handled in a manner that does not result in their becoming contaminated, and the generation of steam that will contact food should not result in its contamination.

121.b Water that is not fit for use in contact with food (e.g., water for fire control and for steam that will not directly contact food) should have a separate system that does not connect with or allow reflux into the system for water that will contact food.

121.c Water recirculated for reuse and water recovered from processing of food by evaporation should be treated where necessary to ensure that the water does not compromise the safety and suitability of food.]

-Para 128: Editorial correction of standard referred to in last sentence (CXS-1985) to read (CXS-1-1985)

General Comment;

The CCFH to reconsider the definition of hazards to ensure that allergens are covered.

East African Community

GENERAL COMMENT

The CCFH to reconsider the definition of hazards to ensure that allergens are covered.

SPECIFIC COMMENT

Para 10: Change subtitle from “USE” to “APPLICATION” in line with Codex procedural manual

JUSTIFICATION

The change will ensure consistency with other codex texts.

SPECIFIC COMMENT

Insert a new Para 85 bis to read as follows “*Personnel working in food establishments should be medically examined prior to employment and periodically in line with the relevant national public health regulations*”.

JUSTIFICATION

The inclusion is in line with national public health regulations in many countries.

Para 107: Replace “aw” with “a_w” for water activity throughout the document.

Para 121: Should be restructured into three paragraphs to provide clarity on the application/use of water during processing as follows;

121a: Water, as well as ice and steam made from water, should be fit for its intended purpose based on a risk-based approach [here we would add the footnote to the FAO/WHO report when it is available]. They should not cause contamination of food. Water and ice should be stored and handled in a manner that does not result in their becoming contaminated, and the generation of steam that will contact food should not result in its contamination.

121b: Water that is not fit for use in contact with food (e.g., water for fire control and for steam that will not directly contact food) should have a separate system that does not connect with or allow reflux into the system for water that will contact food.

121c: Water recirculated for reuse and water recovered from processing of food by evaporation should be treated where necessary to ensure that the water does not compromise the safety and suitability of food.]

Para 128: Editorial correction of standard referred to in last sentence (CXS-1985) to read (CXS-1-1985).

GENERAL COMMENT

The East Africa Community (EAC) proposes countries to strengthen reporting mechanisms of food borne outbreaks through established INFOSAN contact points.

Economic Community of West African States (ECOWAS)

General comment

ECOWAS thanks the Chair and co-chairs for leading the revision of CXC 1-1969. ECOWAS 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: ECOWAS recommends that the definitions be maintained.

Rationale: The terms are used in the text and should therefore be defined to ensure same level of 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: ECOWAS 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: ECOWAS supports the deletion of the term '**condition of**' in the definition of hazard.

Rationale: The term "condition" is not easily understandable further 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, ECOWAS 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: ECOWAS recommends to retain the original text for para.4 as agreed at CCFH50.

Rationale: The amended text suggests 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: ECOWAS 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”

Position: ECOWAS 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 includes 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 same level of understanding.

Issue – Definitions: Definition for FBO.

Position: ECOWAS 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: ECOWAS 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: 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, ECOWAS 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: ECOWAS recommends to revise the text in para 105 as follows:

Some key aspects of ~~food hygiene system~~ **food hygiene practices** 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: ECOWAS 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: ECOWAS 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, ECOWAS recommends the inclusion of other examples of activities that can be considered as “flexible” apart from documentation.

Issue: Some steps employed in the application of HACCP Para 96, 97, 98 100, 101, 102, 103, and 104 (product description, process description, monitoring and verification have been introduced in the application of GHP

Position: ECOWAS proposes to modify the paragraphs to reflect requirements for GHP.

Rationale: There is some confusion on the introduction of some HACCP steps and actions in GHP applications.

Issue – Section 8, 8.2 Product Information para 127

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