

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 6, 7 and 8

CRD09

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

#### Fifty-First Session

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

#### Comments from the Republic of Korea

##### General comments

The Republic of Korea would like to appreciate the Codex secretariat for preparing the document of "Proposed draft revision of the General Principles of Food Hygiene(CXC 1-1969) and its HACCP Annex at Step 4", "Proposed draft guidance for the management of biological foodborne crises/outbreaks at Step 4" and "Proposed draft guidelines for the control of Shiga toxin-producing *Escherichia coli*(STEC) in beef, unpasteurized milk and cheese produced from unpasteurized milk, leafy greens, and sprouts at Step 4".

##### Specific comments

###### Agenda 6

The Republic of Korea would like to make the following suggestions on this document.

1. Replace the term "greater attention" in the paragraphs 5, 18, 22, 99 and 150 with the term "additional attention" specified in Diagram 3.

Rationale : For consistency throughout the document, the term should be harmonized.

2. Add "CCPs" to the second sentence of the paragraph 7 since CCPs are also included in the definition of "Food hygiene system".

Rationale : Food Business Operators(FBO) in paragraph 7 apply that food safety program can protect food safety, as is the case with GHP, so this does not include the food hygiene system, the content needs to be modified.

3. Replace "a hazard" in question 3 of Diagram 3 with "the hazard".

Rationale : Diagram 3 is based on "step in progress" and one or more hazards can be designated as CCP. Therefore, "a hazard" in Question 3 should be changed to "the hazard" as in other Questions.

4. Add an arrow below the "Yes" box under Q3. step towards Q5. step in the Diagram 3 (Examples of Decision Tree to Identify CCPs). (Refer to the Annex of this CRD)

Rationale : If the hazard can be prevented or minimized to the acceptable level in Q3. step of the Diagram 3, it may be preferable to go through Q5. step instead of preceding straight to CCP.

###### Agenda 7

The Republic of Korea would like to make the following suggestions on this document.

The Republic of Korea would like propose to replace the phrase "microorganisms (biological foodborne illness)" in the paragraph 1 of Introduction with "biological agents (biological foodborne illness)".

Rationale : Since "Biological hazards" are defined as "biological agents" containing "microorganisms", this should be reflected in the paragraph 1 of Introduction for consistency.

**Agenda 8**

The Republic of Korea would like to make the following suggestions on this document.

1. Include information on vero toxin in the Introduction or Definition section.

Rationale : Shiga toxin is also known as vero toxin and the term “vero toxin” is still being used in some studies. Therefore, we believe that it is necessary to include this information in the document.

2. Harmonize the format of Annex 1 and 2 in the guideline for consistency.

3. Replace the terms “Fresh leafy green vegetables” and “Leafy greens” with “Fresh leafy vegetables” in the document, including Annex 2.

Rationale: The terms “Fresh leafy green vegetables” and “Leafy greens” are used interchangeably throughout the document. For clarification, we suggest to replace these terms with “Fresh leafy vegetables” since the Scope and Definition sections of Annex 2 refer to the Code of Hygiene Practice for Fresh Fruits and Vegetables (CXC53-2003) including Annex III for Fresh leafy vegetables.

Reference for Agenda 6, 3(Diagram 3 – Example of Decision Tree to Identify CCPs)

