

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

CRD24

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 by Egypt

PROPOSED DRAFT CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS (At Step 5)	
Item	Egypt Comments
Hazard Characterization – para. 14	There is need for precautionary labelling for food suspected to contain allergens. The use of scientifically based threshold levels is a tool to evaluate risk for consumers with food allergies.

PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CXC 1-1969) AND ITS HACCP ANNEX (At Step 3)	
Item	Egypt Comments
Summary of Discussion of the EWG – para. 9	<ul style="list-style-type: none"> - The definitions for “acceptable level”, “competent authority” and “Food Business Operator” recommends must be maintained. - Clarify the difference between HACCP and HACCP Plan, to avoid any confusion in the use of the two terms.
Summary of Discussion of the EWG – para. 10	Supports the deletion of the term ‘condition of’ in the definition of hazard.
Introduction – para. 4	<p>Recommends to the EWG changes for para.4 as follows: <i>“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</i></p>

	<i>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.”</i>
General Principles, Para.16	Recommends retention of the term ‘culture’ in the title as follow: “Management Commitment and Food Safety Culture” to ensuring the roles of personnel with management in food safety culture.
Definitions:	<ul style="list-style-type: none"> - Clarify the definition of “Food Safety culture” - Recommends the modification of the definition of FBO as follow “A person or entity responsible for operating a business at any step in the food chain.”
CHAPTER ONE – GOOD HYGIENE PRACTICES 3.2.1 Drainage and waste disposal facilities – Para. 40	Clarify of Hazardous waste that handled by specially trained personnel because it generates a high risk to the public in the food processing area.
Health Status - Para. 85	Clarify that Health Status for all food handlers.
Control of Operation - para.95 and para.105	Support the use of the term “food hygiene system” due to it is more comprehensive.
CHAPTER TWO – HACCP SYSTEM AND GUIDELINES FOR ITS APPLICATION Section 1: Principles of HACCP System – Principle 6	Supports the inclusion of validation in HACCP Principle 6.
Para.141	Recommends the inclusion of “control measure” .
Flexibility for small and/or less developed food businesses - Para. 143.	Clarify the flexibility meaning, examples and permissible rang can be implemented.
3.11 Establish and verification procedures (Step 11/ Principle 6)	Recommends the modification of this title “Establish and verification procedures” to read as follow: “Establish verification procedures”.
Section 8, 8.2 Product Information – para. 127	Recommends the replacement of the term “person/FBO” with the term “next user or consumer in the food chain”.
Proposed comparison of GHPs and control measures at CCPs with examples – (Annex 1, page 34)	Supports the table in Annex 1 as it helps in the better understanding and implementation of the GHPs and control measures at CCPs

PROPOSED DRAFT GUIDELINES FOR MANAGEMENT OF BIOLOGICAL OUTBREAKS (at Step 4)	
Item	Egypt Comments
Conclusions of the EWG - Para. 12	<p>bullet. 1: Recommends to keep the text and refer to the templates in WHO "Foodborne Disease Outbreaks: Guidelines for investigation and Controls".</p> <p>bullet. 2: Recommends elaborating an example of a template for asking a rapid risk assessment as an annex to the guideline.</p> <p>bullet. 3: Recommends the inclusion of the graphical structure of the network described in the annex.</p>
Definitions - Para. 16	Clarification the definition of "biological hazards" includes metabolites of microorganism such as biotoxin.
Analytical Methods – Para. 49	Recommends keeping the text of Whole Genome Sequencing "Para.49".

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)	
Item	Egypt Comments
Definition of "raw milk"	Recommends to changing the definition as the definition of efsa with some modification to read as follow: "Milk which has not been pasteurized by heating beyond heat treated to more than 40°C or undergone other nor had any treatment that has an equivalent effect to reduce pathogens to an acceptable level".
Annex 2 The use of the terms "fresh leafy green vegetables" "leafy greens" and "leafy green vegetable"	Supports the use of the term "fresh leafy green vegetables" with <u>including a distinct definition</u> .
Adding Annex	Recommends to adding " <u>Annex 3</u> " concerned with the raw milk and cheese produced from raw milk to the proposed draft guidelines.

DISCUSSION PAPER ON THE PRINCIPLES FOR SAFE USE OF WATER IN FOOD PROCESSING	
Item	Egypt Comments
To develop principles/guidelines for the safe use and reuse of water in food production	<ul style="list-style-type: none"> - Recommends the use of the term "guidelines" rather than "principles" - Supports EWG proposed structure of the draft guidelines.