

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Items 3b, 4, 5, 6a

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

#### Forty-ninth Session

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#### COMMENTS OF GHANA

##### AGENDA ITEM 3B (CX/FH 17/49/4):

##### **Para 3 Harmonisation of OIE and Codex approaches to standards setting in the food production continuum**

**Position:** Harmonisation of OIE and Codex approaches to standards setting in the food continuum may not be achievable. However there should be a continuous collaboration and co-operation between OIE and Codex standards setting activities at international and national levels.

**Rationale:** Different approaches are used by OIE and Codex in the setting of food standards notwithstanding the fact that they all seek to protect public health and safety.

##### **Para 6 National level collaboration**

**Position:** Ghana supports the proposed collaboration between OIE and Codex national delegates and recommends further that this collaboration could be done through national SPS and Codex forum.

**Rationale:** This will promote enhanced collaboration between OIE and Codex national delegates.

##### **Para 8-11 Salmonella in pigs and bovine production system**

**Position:** Ghana agrees with the recommendations developed by OIE for the pre-harvest management and control of Salmonella in pigs and bovines and the adoption of Chapter 6.12 and Chapter 6.13.

**Rationale:** The recommendation developed by OIE will supplement the Codex guidelines for the Control of non-typhoidal Salmonella species in pork meat and beef (CAC/GL 87-2016). In addition, the adoption of the additional Chapters (6.12) and (6.13) will help in the prevention and control of Salmonella in pigs and cattle whilst reducing the burden of disease and the risk of illness through foodborne contamination and provides integrated approach for the control of Salmonella in pigs and bovines.

##### **Para 12-13 "Infection with *Mycobacterium tuberculosis* complex"**

**Position:** Ghana supports the adoption by the OIE General Assembly of a new draft Chapter "Infection with *Mycobacterium tuberculosis* complex" (Draft Chapter 8.11) and the inclusion of *M. tuberculosis*, *M. Caprae* and *M. Bovis* is also laudable.

**Rationale:** The adoption of the new draft Chapter "Infection with *Mycobacterium tuberculosis* complex" will provide added risk management measures for all relevant species of the complex in bovids, cervids and goats. Furthermore, provision has also been made for the management of human and animal health risks associated with this pathogenic agent.

##### **AGENDA ITEM 4: PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CAC/RCP 1-1969) AND ITS HACCP ANNEX (CX/FH 17/49/5)**

##### **Para 8(i): All food businesses to undertake hazard analysis**

**Position:** Ghana recommends that food hazard analysis should not be undertaken by all food businesses.

**Rationale:** Not all food businesses are capable of undertaking hazard analysis and implementation of HACCP principles. However, food businesses have a responsibility to inform themselves and be aware of the hazards associated with their processes. Food businesses can seek information from Competent Authorities or other recognized bodies. Small businesses should be encouraged to implement good hygienic practices which are more achievable at their level than the HACCP system.

##### **Para. 8(ii): Introduction of "enhanced GHPs"**

**Position:** Ghana does not support the introduction of the term “enhanced GHP”.

**Rationale:** Even though some control measures may require more attention, validation and monitoring there is no need to introduce the new terminology. Furthermore, the objective of the introduction of the concept of “enhanced GHP” can be addressed by effective implementation of GMP.

#### **Para 8(iii): Good Hygiene Practices-Primary Production**

**Position:** Ghana supports the need to keep a separate section on primary production in the current document.

**Rational:** Some provisions apply only to primary production which has specific requirements, in this case, Ghana recommends the inclusion of the section on primary production. However the section should be developed to strengthen references throughout the document to demonstrate how the guidance applies to all stages of the food chain.

#### **Para. 9: Alignment of Codex terminologies to ISO 22000.**

**Position:** Ghana does not support the alignment of Codex terminology with ISO 22000.

**Rationale:** The ISO 22000 is currently under revision and therefore there is a need to wait for the completion of the revision. The work of Codex must remain the basis and source for other standards.

#### **Appendix I, para. 4: Suggested alternative paragraphs 4A and 4B:**

**Position:** Both introductory paragraphs are acceptable. However, Ghana supports the adoption of paragraph 4A. Further, the paragraph should be revised to provide a modification statement to reflect the need for flexibility to satisfy the needs of small businesses.

**Rationale:** Paragraph 4A provides more flexibility for the small businesses and is devoid of “enhanced GHP” concept which will be difficult to understand and implemented by small businesses. It also stresses that GHP are sufficient for some food businesses to control all food safety hazards.

#### **Appendix I: Scope**

**Position:** Ghana recommends that the word ‘conditions’ is replaced with the word ‘measures’ and replacement of the word phrase “in the manufacture” with “along the food chain” in line two of the scope. The new scope will read “this document provides a framework of general principles for producing safe and suitable food for human consumption by outlining necessary hygiene and food safety ~~conditions~~ **measures** to be implemented ~~in the manufacture~~ **along the food chain** and recommending where appropriate, specific food safety control measures at certain steps throughout the food chain”

**Rationale:** This is to ensure clarity and the application of food safety control measures in manufacturing and the entire food chain.

#### **Appendix I: Definitions**

**Position:** Ghana does not support the need to define “enhanced GHP”.

**Rationale:** The proposed “enhanced GHP” can be taken care of by GHPs. Further, this is to avoid misunderstanding and difficulty in the implementation of GHPs among business operators especially the small businesses. The application of GHPs in business operators should be encouraged since it’s more feasible and easy to implement.

#### **Appendix I: Definition of “Food Hygiene System”**

**Position:** Ghana agrees with the current definition of “Food Hygiene Systems”.

**Rational:** The concept of the current principle underpinning the definition encompasses the idea that food hygiene includes safety and suitability. This definition is also in line with the definition in Codex Procedural Manual.

#### **Annex I: Proposed decision tree to identify “enhanced GHP”**

**Position:** Ghana considers the proposed decision tree as useful. However, there is a need to replace the statement “move to next step, begin with Q1” with “next process step, begin with Q1” for clarity.

**Rational:** To provide clarity in the decision tree steps.

#### **Section I: Establishment design and Facilities**

**Position:** Ghana does not support the defining of site boundaries and landscaping of food facilities and therefore suggests that the statement **“Site boundaries should be clearly defined. Landscaping near a food facility should be properly designed to minimise attractants and pest harbourage. Where**

necessary, experts should be consulted for advice on appropriate plants for use in landscaping” be deleted.

**Rationale:** The provisions in the statement are too prescriptive. The objective of minimizing pest attractant and harborages can be achieved by several pest management measures.

**Para 13: Drainage and Waste disposal**

**Position:** The current statement of section 13 on “Drainage and Waste Disposal” needs to be modified. The statement “The waste collection/disposal site should be located away from the food establishment to prevent pests infestation” should be replaced with the statement “**The waste collection on-site should be undertaken in a manner that prevents pest infestation and cross contamination of food. The waste disposal site should be located away from the food establishment to prevent pest infestation and contamination**”.

**Rationale:** The proposed sentences provide clarity as to the responsibility of the food business in ensuring that the collection and disposal of waste are done in a manner that prevents pest infestation and cross contamination of food.

**Para. 28-33 Section II: Control of Operations-Additional Sections on product, process description, monitoring procedure**

**Position:** Ghana does not support the additional sections on product description, process description and monitoring procedures.

**Rationale:** The proposed additional sections are adequately addressed in the section that covers HACCP. Therefore there is no need to include them in Section II. This is to avoid duplication and complication in the implementation.

**Para. 43: Key aspects of Hygiene control system (Microbiological cross contamination)**

**Position:** The word “thorough’ should be changed in the text to ‘through’ for the first sentence to read; “....contamination occurs ~~through~~**through** the transfer of microorganisms from one food to another”.

**Rationale:** To provide clarity and understanding for easy implementation

**Para. 48-Allergenic Contamination**

**Position:** Ghana supports the addition of the section on allergenic contamination and the need to notify consumers where there is likelihood that cross contamination from food containing allergens cannot be prevented.

**Rationale:** Current technology in the industry may not be able to eliminate all traces of allergens. Likewise, GHP may not be able to adequately prevent unintentional contamination from allergenic substances. There is the need to inform consumers about it.

**Para 66: Section III: Statement in Square brackets**

**Position:** Ghana supports the statement in para.66 and therefore recommends the removal of the square brackets on the statement.

**Rationale:** The statement suggests the need to separate cleaning tools for cleaning different areas depending on hygienic status of the different areas in the food operating facilities. This is in line with GHP.

**Para. 69: Section III: Sanitation [Cleaning and disinfection] programmes**

**Position:** Ghana supports the definition for ‘sanitation’ and therefore recommends maintaining the definition in the square brackets.

**Rationale:** For clarity and easy implementation

**CHAPTER 2: Definitions: Hazard Analysis and Critical Point (HACCP) System and Guidelines for its application/definitions**

**Position:** Ghana does not support the development of the definitions for “hazard control measure” and “Hazard Control Plan”.

**Rationale:** “control measure” is defined in HACCP terminology as “any action and activity that can be used to prevent or eliminate a food safety hazard or reduce it to an acceptable level”. This definition pre-supposes that control measures are applicable to hazards. Furthermore, “HACCP Plan” is defined as “A document prepared in accordance with the principles of HACCP to ensure control of hazards which are significant for food safety in the segment of the food chain under consideration”. This definition is sufficient to take care of the significant hazards that the proposed definition of “HACCP control Plan” aims to control. Therefore the

need to define “hazard control measure” is not necessary. The “Hazard Control Plan” with its proposed definition has a potential to cause confusion in the choice of a system of control measures based on GHP alone or a combination of GHP and HACCP.

#### **Para. 26: Application of HACCP Principles**

**Position:** Ghana recommends that a second look is taken at the concept of “significant hazards” and its application under HACCP system.

**Rationale:** The idea that the proposed “Significant hazard” is of such a nature that their elimination or reduction to acceptable level is essential for safe food and should be controlled by “hazard control measures” designed to eliminate or reduce significant hazards to acceptable level can be achieved through the application of GHP. This can make the principle of significant hazard and “enhanced GHP” more difficult to be understood and implemented especially in differentiating between GHP and “enhanced GHP.”

#### **AGENDA ITEM 5 (CX/FH 17/49/6): PROPOSED DRAFT GUIDANCE FOR HISTAMINE CONTROL IN THE CODE OF PRACTICE FOR FISH AND FISHERY PRODUCTS (CAC/RCP 52-2003)**

##### **Para. X.1: Implementation of HACCP based approach by fishing vessels**

**Position:** Ghana does not support the proposed requirement for the implementation of HACCP by all fishing vessels. However, HACCP system at the level of fishing vessels that process their products on board may be applied, but the implementation of HACCP system at artisanal fishing vessels may not be feasible and practical. GMP should be encouraged and implemented in artisanal fishing.

**Rationale:** Artisanal fishing is a primary production activity and GMPs are more feasible to implement than HACCP. The application of GHP in artisanal fishing is sufficient to prevent production of high levels of histamine.

##### **Par. X.1: Training of responsible crew in HACCP Principles**

**Position:** Ghana does not support the training of artisanal fishing crew members in HACCP Principles to control histamine formation. However, training in GMP for artisanal fishing industry is recommended.

**Rationale:** Not all fishing companies are at the same level of capability to implement HACCP. Therefore it is highly recommended that artisanal crew members be trained in GMP since it is sufficient to prevent histamine formation.

##### **Figure X.1: Example flow chart for the production of fish at risk of Scombrotoxin formation**

**Position:** Ghana does not support the current flow chart in the text.

**Rationale:** A typical HACCP flow chart should only indicate process steps and associated critical limits, where relevant, and not monitoring and other related activities as process steps.

##### **Para X.2.2, Temperature monitoring: If an internal temperature in a sample of fish exceeds 4°C, then the entire fishing vessel delivery lot should be considered at risk.**

**Position:** Ghana expresses concern about whether it is appropriate to consider an entire vessel delivery lot “at risk” based on an internal temperature of just one sample of fish exceeding 4°C. Ghana recommends that the Committee revises the sampling plan.

**Rationale:** The sample size of one fish out of the entire fishing vessel lot is too small, very restrictive and does not representatively reflect the entire lot. It is therefore statistically biased, making rejection of the fish scientifically unacceptable. The proposal has a potential of being a barrier to trade.

##### **Para. X.2.4.1: Reference to the levels of histamine in freshly harvested scombrotoxin forming fish as 2 mg/kg and that business operators can achieve 15 mg/kg in the text.**

**Position:** Ghana does not support referenced levels of histamine of 2 mg/kg freshly harvested fish and 15 mg/kg in processing.

**Rationale:** The reference to 2mg/kg and 15mg/kg in the text may lead to misunderstanding and can be considered as critical limits in the industry; furthermore consultation is needed to consider variations in climatic conditions and differences in conditions under which fish is harvested and processed globally.

##### **Para. X.2.4.2: Addition of histamine sampling plan**

**Position:** Ghana does not support the inclusion of histamine testing and sampling plan in the text at this stage.

**Rationale:** The 48<sup>th</sup> Session of CCFH agreed that the guidelines on histamine control will be the first to be developed and followed by the development of sampling plans in the second phase of the committee’s work.

**AGENDA ITEM 6(A): CX/FH17/49/7: NEW WORK/FORWARD WORK PLAN****APPENDIX 1: Proposal to develop a Code of Practice on Food Allergen Management for Food Business Operators**

**Position:** Ghana supports the development of a code of practice on food allergen management.

**Rationale:** Currently there is no specific Codex standard or code of practice/guidelines for the management of allergens in food. The development of this document will therefore provide a comprehensive guidance for allergen management that will contribute to the protection of health and safety of consumers. The code of practice will also facilitate a proactive approach to managing allergens in food production.

**APPENDIX 2: Development of a guidance document for the management of (micro) biological foodborne crisis/outbreaks**

**Position:** Ghana supports the proposed development of Guidance Document for the Management of (Micro) Biological Foodborne Crisis/Outbreaks

**Rationale:** Foodborne outbreaks have serious economic and health consequences. Guidance document to manage foodborne crisis/outbreaks will therefore be useful in minimising the impact and incidences of foodborne crisis/outbreaks. The document is also in line with one of the mandates of Codex Alimentarius Commission, which is the protection of public health and safety. The document will promote a coordinated management approach for handling foodborne crisis/outbreaks from a multi-sectorial approach.