

Alignment of Codex texts developed by CCFH with the revised General Principles of Food Hygiene (CXC 1- 1969)



Introduction

CCFH53 requested that the United Kingdom prepare a document for CCFH54 to initiate work and provide options for the approach for the alignment of Codex food hygiene texts with the revised General Principles of Food Hygiene (CXC 1-1969).

The purpose of the alignment is to create consistency across texts and is not to alter the standards themselves.

The UK proposed three options for alignment, a worked example used to illustrate requirements for alignment, and recommendations to open discussion as to the prioritization and feasibility of carrying out this work.

Options for Alignment

It is expected that where applicable newly developed text would be fully aligned with CXC 1-1969. The following options relate to any existing text that follows the structure of the General Principle of Food Hygiene (CXC 1-1969).

- **Option 1 – Simple alignment.** Existing documents are revised with an updated reference to the correct section of CXC 1-1969 using a correlation table and any other reference to other Codex documents. No other changes made.
- **Option 2 – Full structural alignment.** As option 1 but with existing texts structurally aligned to CXC 1-1969.
- **Option 3 – Full structural and technical alignment with CXC 1-1969.** As option 2 with detailed review of definitions in each text and consideration of how changes and definitions in CXC 1-1969 will impact on the document being revised such as; further scrutiny of references to GHPs and HACCP and reviewing of sections to propose areas where texts can be streamlined to refer to CXC 1-1969.

Recommendations for Alignment Work and Prioritisation

For consistency in alignment of texts a formalized process needs to be agreed by CCFH. In this context it is recommended that:

- i. The work is prioritized, divided, and integrated into the future work plan.
- ii. A standing working group is created to consider how the alignment of existing texts should be prioritized, how work can be divided, and to work with the Chairperson of the EWG on the forward work plan to update the future work plan
- iii. A hybrid approach to the alignment (Question 9);
 - 1) texts undergoing technical revisions or part of the forward work plan be aligned within existing EWG during their technical revisions to **Option 3**
 - 2) alignment of remaining texts not part of forward work plan be carried forward by dedicated Alignment Working Group to **Option 2**
- iv. Age of text as a possible mechanisms for prioritizing texts (Question 10)

Appendix C (Option 2) - QUESTION 1, 2, & 3

Question 1 Currently, texts have a specific cross reference to the relevant section of the General Principles of Food Hygiene (CXC 1-1969). Due to new sections being added in the last revision, where there is no existing text in the document being aligned, is more appropriate to have:

- a) a simple cross reference to the General Principles of Food Hygiene (CXC 1-1969) is included to maintain alignment of headings.
- b) new wording specific to the text being aligned is created.

Question 2 Section 7–Introduction and Control of Food Hazards of CXC 1-1969 provides additional information on when it may be determined that GHPs alone may be sufficient to manage the hazards. Is it appropriate to include a simple cross reference to Section 7 of CXC 1-1969 given the importance of this section?

Question 3 Is it necessary to elaborate “Objectives” and “Rationale” for each section similar to CXC 1-1969 or would a simple cross-reference be sufficient?

Appendix C (Option 2) - QUESTION 4, 5, & 6

Question 4 Is it necessary as part of alignment work to review paragraphs of text and determine whether the information included, in addition to the reference to CXC 1-1969, is beneficial to the text?

Question 5 Is it necessary as part of the alignment work to list out each sub-heading in such sections and provide a specific cross reference to CXC 1-1969 in each case or whether a single cross reference to main section is sufficient?

Question 6 In addition to aligning existing texts with CXC 1-1969, is it also necessary to ensure alignment with the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023) which was adopted at the 46th session of the Codex Alimentarius Commission?

Appendix D (Option 3) - QUESTION 7 & 8

Question 7 Should the blank template (Appendix B) consist of Option 1 main heading template or Option 2 main headings and sub-headings?

Question 8 Should the alignment process replace text with updated text from the CXC 1-1969 or should it be streamlined to include only references to relevant the section of the CXC 1-1969, unless there are additional details relevant to individual guidelines?



Thank you

