



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Forty-eighth Session

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COMMENTS ON PROPOSED DRAFT REVISION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE (CAC/RCP 1-1969) AND ITS HACCP ANNEX

(Comments of Guinea, India, Indonesia, Republic of Korea, Somalia)

GUINEA

Paragraphe 1 : Introduction

Question: Le choix de l'introduction générale et d'un paragraphe introductif.

Position de la Guinée : La Guinée soutient l'**Option A** du paragraphe introductif, moyennant une modification du texte :

Ligne 9 : Remplacer le mot « **gâchis** » par « **gaspillage** » : La phrase est modifiée comme suit : « *La détérioration des aliments est une source de **gaspillage**; elle est coûteuse et peut se répercuter négativement sur le commerce et la confiance des consommateurs.* »

ligne 10 - 13, reformuler la phrase comme suit : Des pratiques efficaces d'hygiène alimentaire, notamment les bonnes pratiques d'hygiène (BPH) et l'application du système d'analyse des **dangers** et maîtrise des points critiques (HACCP) sont donc essentielles pour éviter les effets **néfastes sur la santé humaine** d'aliments ~~peu sûrs ou~~ impropres à la **consommation** ~~sur la santé humaine~~

Justification : L'un des objectifs de la révision du texte est de rédiger une « partie introductive » unique et consolidée qui présente les deux approches (BPH et HACCP) visant à améliorer la sécurité et la salubrité des aliments. L'Option A tient compte de ces deux concepts alors que l'Option B ne tient pas compte de l'approche HACCP. En outre, le concept des « habitudes alimentaires » (ligne 9 de l'Option B) est très général et pourrait inclure les questions qui ne concernent pas la sécurité et la salubrité alimentaires et qui ne constituent donc pas l'objet principal des BPH et du système HACCP.

Paragraphe 2: Paragraphe introductif

Position de la Guinée: La Guinée soutient l'**Option A**, moyennant l'ajout de la phrase suivante :

Le présent document montre la manière dont la sécurité et la salubrité alimentaires peuvent être renforcées tout au long de la chaîne alimentaire, de la production primaire au consommateur final, y compris à l'étape de la fabrication et de la distribution. **Il fournit les lignes directrices permettant aux gouvernements nationaux de mettre en place une surveillance adéquate et aux entreprises de mettre en place leur propres systèmes de contrôle, en fonction de leurs besoins spécifiques.**

Paragraphe 6: Objectifs

Position de la Guinée: Reformuler le préambule au paragraphe 6 afin de l'harmoniser avec l'intitulé du document, comme suit :

*Principes généraux d'hygiène alimentaire en vue de préserver la **sécurité alimentaire et la salubrité des aliments produits alimentaires**: Bonnes pratiques d'hygiène (BPH) et système d'analyse des risques aux points critiques (HACCP) visent à....*

Paragraphe 13 : Principes de base d'un système de contrôle de l'hygiène **sécurité alimentaire**

Question: Ligne (i): La question des « BPH et du système HACCP est un processus à deux phases ou composantes ».

Position de la Guinée: La Guinée soutient le projet proposé à la ligne (i) du paragraphe 13 (*BPH et HACCP est un processus à deux phases ou composantes*).

Un système de sécurité alimentaire solide visant à optimiser la sécurité et la salubrité alimentaires des aliments doit garder une certaine flexibilité dans la mise en œuvre des BHP et du HACCP, lorsque cela devient nécessaire. Les deux concepts « **phase ou composante** » pourraient donc être utilisés de façon interchangeable et le principe essentiel à considérer est celui de la nécessité d'établir et de mettre en œuvre le HACCP uniquement après avoir mis en place les BPH. L'actuel projet de révision proposé aborde suffisamment ce principe.

Question: Ligne (iii): Supprimer dans le texte « **dangereux ou non** ». Remplacer la phrase originale par « **les BPH devraient s'assurer que les aliments sont produits dans un environnement sain tout en réduisant la charge de contaminants** ».

Justification: La suppression et le remplacement de ce passage sont nécessaires, du fait que, de par leur nature, les contaminants alimentaires ont le potentiel de causer des effets nocifs sur la santé humaine et que la simple présence de contaminants peut compromettre la sécurité et la salubrité des produits alimentaires.

Paragraphe 14 : Définitions

Définitions propres au système HACCP

Question: Les définitions des termes suivants : **actions correctives** et de **correction**:

Position de la Guinée: La Guinée soutient la définition de l'**Option A** (basée sur la norme ISO 9000), qui précise que:

Action corrective : *[Action portant sur le processus ou l'environnement visant à éliminer la cause d'une non-conformité détectée et prévenir sa récurrence].*

Correction : *[Action visant à éliminer une non-conformité détectée.]*

Les définitions de l'ISO ont été harmonisées par plus de 180 pays membres dont beaucoup d'entre eux sont aussi membres du Codex. De plus, ces définitions ont été largement adoptées et mises en œuvre par l'industrie alimentaire. Dans un souci d'harmonisation, le CCHA devrait donc adopter les définitions de l'ISO.

Question: Définitions de **Validation** :

Position de la Guinée: La Guinée recommande le remplacement de l'actuelle définition révisée de **Validation** par celle de la norme ISO 9000, qui définit ce terme comme une « *confirmation, par des preuves objectives, que les critères requis pour un certain usage ont été remplis.* »

La définition actuelle révisée du terme validation est étroite et ne tient pas compte des activités comme la confirmation du Diagramme des Opérations, qui est également considérée comme une activité de validation. La définition de la norme ISO 9000 présente une approche plus inclusive.

INDIA

General Comments

India would like to thank France for leading the important work on revision of the GPFH and preparing the base paper for initiating discussions.

The proposed concept of two types of CCPs is confusing and hence needs to be avoided. Also, the approach to present food safety control system through a phase/component concept is confusing and does not add value except for academic interests. Food businesses would utilize GHPs and, where appropriate and feasible, HACCP system to ensure food safety. When used in the context of HACCP system, the GHPs would form a pre-requisite program. Those control measures that are applied to address food safety but the effect of which cannot be monitored against a critical limit or in real time, need to be recognized conspicuously and emphatically. In doing so, however, it should be kept in view that GHPs would practically continue to be the major contributor to food safety in certain segments of the food chain, eg., primary production in general and specifically by small producers in developing countries. Hence, value of GHPs should not be undermined during the revision of the GPFH. Our specific comments below are aimed at addressing the above points at this stage.

It is also to be noted that the current document for initiating discussions does not present the complete picture of the document. Only a part of the document has currently been presented. In view of this, the specific comments presented below are tentative and would evolve as necessary during the progression of the document.

Specific Comments

Appendix I

1. Title of the document:**India would like to amend the title as under:**

General Principles of Food Hygiene ~~for Food Safety and Suitability~~: Good Hygiene Practices (GHPs) and Hazard Analysis and Critical Control Point system (HACCP).

Rationale: The mention of food safety and suitability in the title is not required and does not add any value.

Introduction**Para 1**

Option B: India agrees Option B.

Rationale: It is observed that “welfare of people regarding their food consumption “and “psychological trauma”, as mentioned in option A, are not related to food hygiene and thus is beyond the scope. Option B is in alignment with the existing Codex document CAC/RCP 1-1969 on General Principles of Food Hygiene and continues to be relevant and appropriate.

Para 2

India proposes a combination of option A and option B as under:

This document will outline the general principles that should be understood and followed by food businesses and help governments to establish appropriate oversight. This document shows how food safety and food suitability can be enhanced throughout the food chain from primary production to the final consumer, including manufacturing and distribution. To achieve this, each business establishes its own control system taking into account its specific requirements.

Rationale: This approach will cover both-the very essence and aim of what this document is about.

Para 4

The text may be revised as under:

The application of appropriate GHPs in food businesses provides ~~a sanitary environment~~ **conditions** that supports the production of safe and suitable food.

Rationale: Good hygiene practices should cover all conditions and measures that facilitate food safety. The phrase “sanitary environment” does not appear to include all of these.

Bullet 4: Example may be deleted

Rationale: The example included in the text might appear as if administration of veterinary drugs will be covered in HACCP.

Scope

Para 7: The text may be amended as under:

This documenthygiene conditions and applying, where appropriate, ~~enhanced~~ **specific** control measures at certain, as appropriate.

Rationale: It will bring more clarity to the text.

Para 12

Bullet 2: The text may be amended as under:

Ensure that consumers have clear and easily- understood information ~~including ingredient content~~, by way labelling and other appropriate means.

Rationale: The ingredient content is already specified on the label ~~so it's no point~~ thus, a specific separate mention in the text not required.

BASIC PRINCIPLES FOR A FOOD SAFETY CONTROL SYSTEM

India would propose to amend the title as under:

BASIC PRINCIPLES CONCEPTS OF A FOOD SAFETY CONTROL SYSTEM

Rationale: to bring more clarity to the text and not to confuse with the principles of HACCP

Point (i): The text may be amended as under:

(i) The recommended way to maximize food safety and suitability is **through** a ~~two (phase/ component)~~ preventive approach.

Rationale: A preventive approach is required for food safety which could be achieved through various means. A specific mention of number of phase/ components etc is confusing and hence recommended for deletion. The mention of phase/ component could be of theoretical/ academic interest and its deletion will have no practical implications on the efficacy of a food safety control system.

Point (ii): ~~The implementation of GHPs is the first [phase/component], of the design of a food safety control system.~~

This bullet may be deleted

Rationale: A mention of number of phase/component etc is confusing and hence recommended for deletion. The importance of GHPs as a prerequisite is covered under bullet number iv.

Point (iii): The text may be amended as under:

(iii) GHPs should ensure that food is produced in conditions ~~sanitary environment~~ and that reduce the burden of contaminants. ~~whether hazardous or not.~~

Rationale: “**whether hazardous or not**” is already covered under the definition of contaminant, thus recommended for deletion.

Point (iv): The text may be amended as under:

(iv) Implementation of HACCP system, where need and feasible, necessitates that GHPs are applied as a prerequisite to the implementation of a HACCP system because they provide the foundation for a HACCP system to be effective.

Rationale: GHPs can be applied independent of HACCP system as well. Where HACCP is applied, they are applied as a prerequisite.

Point (vi): The bullet may be deleted:

~~(vi) The implementation of HACCP where needed and feasible, is the second [phase/component] of the design of an effective food safety control system.~~

Rationale: A mention of number of phase/components etc is confusing and hence recommended for deletion. The relationship of GHPs and HACCP are covered in the amended bullet point (iv) above.

Point (vii): The text may be amended as under:

(vii) **Application of HACCP system** should identify all probable hazards associated with the production process and its environment, and specify the significant ones that should be controlled because they can occur at an unacceptable level.

Rationale: For better clarity

Point (x): The text may be amended as under:

(x) Changes in the food business, e.g. new process, new ingredient, new product, new equipment **etc** should leadand when necessary validated

Rationale: Editorial Correction.

Definitions

Good Hygienic Practices: Amend as follows:

Programs and actions aiming specifically at food hygiene and to reduce the level of contaminants, whether hazardous or not, applied in the establishment.

Rationale: GHPs can be applied in isolation of or together with HACCP. GHPs can be termed as prerequisite only in the context of HACCP.

Prerequisite programs: ~~Procedures~~ **Processes** and actions taken to maintain hygienic conditions throughout the food chain that provide the foundation for the HACCP system.

Rationale: The term ‘Procedures’ by general understanding, would always involve documentation as an inherent component. For petty food business operators and small producers, it will be difficult and many times unnecessary to require documentation.

Corrective action: The definition is proposed as under:

Corrective action: Any action to be taken to eliminate the cause of a detected nonconformity and to prevent its recurrence.

With this, the definition of the other term ‘correction’ will not be required.

Rationale: To retain only one term that will cover both the types of action-immediate action to eliminate a non-conformance in a lot/batch of product, where appropriate and possible without compromising food safety and an action with long term objective of ensuring that there is no recurrence of the same non-conformance in future.

Hazard A biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect`

Comment:- India proposes to retain words “or conditions” as the definition is in aligned with the current definition as prescribed in Codex procedural manual.

Critical Control Point (CCP):

India proposes to retain the current definition without any modifications to it.

Rationale: The term ‘eliminate’ used in the definition is in the context of microorganisms where it is possible to claim elimination of specific microorganisms after a treatment is applied. For example, in article by Andrew et. al., (2003) entitled “Pasteurization of dairy products: Times, temperatures and Evidence for control of pathogens” a page no. 17 section 3.3.6 Coxiellaburnetii mentions that a study carried out by Enright et al. 1957, on HTST pasteurization conditions and its killing effect on Coxiellaburnetii was reviewed in this article and concluded that these conditions are “.adequate to eliminate viable C. burnetii (sic) from whole raw milk”.

Control measures: Retain the definition in addition to a proposed definition for the term ‘Hazard Control Measure’s as follows:

Any action and activity that can be used to prevent or eliminate a food safety hazard or reduce it to an acceptable level.

Rationale:-The definition “Hazard control measure” is specific to HACCP which leaves no scope for control measures applied through GHPs and thus, India proposes retain the definition of the term control measure’which could be applicable to GHPs as well as HACCP. With this, the new proposed definition of ‘Hazard Control Measure’ will be a sub-set of the term ‘control measure’.

Proposed definition for a new term: It is proposed to define a new term ‘Critical or Elevated Good Hygienic Practices’ as follows:

‘Critical or Elevated Good Hygienic Practices’ are those programs and actions of the GHPs that contribute significantly to reduction in the level of contaminants but cannot be validated , and hence are identified as having to be monitored, verified and documented.

Rationale: To recognize that there are control measures that are as good as ‘hazard control measures’ in terms of their role in ensuring food safety but cannot be monitored against a critical limit and hence cannot be within the ambit of HACCP system where establishment of a critical limit is an important principle that must be followed.

INDONESIA

General Comments:

In general, we approve the documents that have been formulated with several comments refers to regulation applied in Indonesia.

Specific Comments:

Agenda Item 4 Proposed Draft Revision of the General Principles of Food Hygiene

Section Introduction

Paragraph 1

Indonesia supports option A

Rationale: Option A is more appropriate and It includes all aspects discussed in this document

Paragraph 2

Indonesia supports option A

Rationale: This document is not only used for business operator and government but customer need to be explained on food safety in the food chain from primary production to the final consumer

Paragraph 3

Indonesia proposes to delete sentence as below:

The first section will describe Good Hygienic Practices for Food Safety and Suitability (GHPs). GHPs are the basis of any food safety control system:

- GHPs are aimed at preventing or reducing the level of contaminants so that the suitability of the end product as well its safety will not be compromised.
- GHPs are part of prerequisite programs which should always be implemented in any operating food business.
- All employees should be trained in GHPs as appropriate to their job activities; it is important that food handlers have basic knowledge of the impact GHPs can have on the safety and suitability of food.

~~— GHPs, in general, only need basic knowledge and skills~~

Rationale: Already covered in the previous explanation

Paragraph 5

Indonesia proposes to delete sentence as below:

The second section will describe the Hazard Analysis and Critical Control Point System for Food Safety (HACCP).

- HACCP application will not be effective without prior implementation of GHPs.
- HACCP is a preventive approach that aims to enhance food safety where this is appropriate and feasible, by improving the control of hazards over that achieved by the GHPs.
- HACCP accomplishes this with the help of hazard control measures applied at critical control points (CCPs).
- HACCP may not be applicable to all type of food businesses, in particular at the stages of primary production. However, the principles of HACCP can be applied to certain activities related to primary production [e.g. administration of veterinary drugs].

~~— HACCP requires specific knowledge and skills~~

Rationale: Already covered in the previous explanation

Paragraph 7

Indonesia proposes to add word as underlined as below:

“This document provides a framework for producing foods that are safe and suitable for human consumption by setting out necessary hygiene conditions and applying, where appropriate, enhanced control measures at certain production steps. The document is intended for use by food business operators ~~and~~ countries, and consumer, as appropriate,”

Rationale: consumer should also know this document

Section Definitions

Paragraph 15

Indonesia agree to the option B (US) to definition of corrective action and correction

- **Corrective action** Any action taken when a deviation occurs to correct the problem, to segregate and evaluate any food impacted by the deviation and determine appropriate disposition of the food, and to identify the cause of the problem and reduce the likelihood it will reoccur.
- **Correction:** An action taken in lieu of corrective actions to identify and correct a problem when a deviation does not impact the safety of the food (e.g. recleaning insanitary equipment before production begins).
- Rationale : Option B is more detail and explaining definition of corrective action and correction more precisely.

REPUBLIC OF KOREA

1. We suggest changing the NOTE of Hazard in the Definitions section, as follows :

Hazard: A biological, chemical or physical agent in food with the potential to cause an adverse health effect.

NOTE Examples of hazards include bacteria and their toxins, viruses, parasites, prions, allergens, heavy metals, mycotoxins, foreign bodies, pieces of solid food that can cause ~~choking~~ injury.

Rationale: Solid food may cause not only choking but also other types of injuries that are categorized as physical hazards. Therefore, we suggest that “choking” should be replaced with “injury”.

SOMALIA

Paragraph 13: Basic Principles for a Food Safety control system

Issue: Line (i): The issue of “GHPs and HACCP is a two phase /component process”.

Position: Somalia is suggesting to replace the proposed draft text in line (i) of paragraph 13 (*GHPs and HACCP is a two phase/components*).

Replace to:-

(GHPs and HACCP is two distinct applications in food production and process but is also complementary where applicable and necessary).

Justification: **Not all food commodities require HCCAP but** the implementation of GHPs is mandatory practice to achieve safe food which is fit for human consumption.

HACCP is a product and process related application and is an optional application but when properly implemented it enhances food safety attributes

Issue: Line (iii): Delete “**whether hazardous or not**” from the text. Delete and replace the original sentence with “***GHPs should ensure that primary food chain production are treated and handled in a sanitary environment to avoid contaminants***”.