

CODEX ALIMENTARIUS COMMISSION



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Organization

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Comments on the
Proposed Draft Revision of the General Principles of Food Hygiene and its HACCP Annex

Comments Submitted by:

Benin, European Union, Gambia, Ghana, Kenya, Nigeria, Norway, Philippines, Senegal, Thailand,
Zambia, African Union

BENIN

Paragraphe 1 : Introduction

Le Bénin 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** d'aliments peu surs ou impropres à la **consommation** sur la **santé** humaine.

Paragraphe 2 : Paragraphe introductif.

Le Bénin 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

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 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 la sécurité alimentaire

Le Bénin 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 doit garder une certaine flexibilité dans la mise en œuvre des BPH 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.

Paragraphe 14: Définitions

Le Bénin 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.]

Définitions de **Validation** :

Le Benin 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.

EUROPEAN UNION

General comments

As general comments, the EUMS would like:

- to stress the need for consistency in terminology with other international standards such as ISO 22000, including the wording "food safety management system" instead of "food safety control system"; management system = control system + assurance system (validation, verification, record keeping);
- to maintain its support to the agreed structure of a revised guidance document, e.g. providing an introduction and two distinct parts (currently called) "good hygienic practices" and "HACCP system"). However, it is recommended to add an additional section in the introduction explaining the link between the two parts within a food safety management system (FSMS), with the hazard analysis playing a central role. Such section could also explain the link between a FSMS, GHP, GMP, etc., codes of hygienic practices and prerequisite programs. The EUMS believe that such section would provide a substantial improvement to the understanding of how a FSMS should be developed in an integrated way, to the link with product specific Codex codes and can be adapted to the nature (risk) of the production and the size of the establishment. Alternatively, these principles could be better developed within the section on "Basic Principles for a Food Safety Control System".
- to express its doubts if "food suitability" needs to be considered. It complicates the document and may not be within the scope of this document. If maintained, the differences between "food safety" and "food suitability" must be made clearer.
- to reflect on the heading of the first section describing "*Good Hygienic Practices for the Safety and Suitability (GHPs)*" which seems too restrictive, not covering GMP, GAP, ... (preventive measures within a Food Safety Management System). Additionally, 2 other options should be considered:
 - "Prerequisite programs", for reasons of consistency with ISO 22000;
 - "General codes of hygienic practices" or "General Principles for Food Hygiene", for consistency with the wording of other specific Codex standards.
- to suggest that the text be integrated with practical examples to improve the understanding

With regards to the recommendations made by the EWG:

- a) The EUMS are not in favour of introducing different types of CCP (type A and type B) as suggested in point 8 of the work of the EWG as this might further complicate the understanding of a CCP. Within the HACCP part, the need for a differential monitoring and corrective actions for CCPs can be explained. This does not exclude the inclusion of the concept of an "operational control point".
- b) The EUMS support an effective exchange of information within an EWG.
- c) See specific comments to Appendix I; in addition the EUMS are reluctant to develop the concepts of GHP-based and HACCP-based control measures; these concepts are explained in other documents and would make the reading of the revision more complicated.

Specific comments to Appendix I

Paragraph 1

Option B is preferred in particular because it includes the importance of the general principles in international food trade. Suggest slight reformulation as follows:

"People have the right to expect the food they eat to be safe and suitable for consumption. Foodborne illness and foodborne injury are ~~at best unpleasant; at worst,~~ **and in some circumstances** they can be **severe and** fatal. But there are also other consequences. Outbreaks of foodborne illness can damage trade and tourism, and lead to loss of earnings, unemployment and litigation. Food spoilage is wasteful, costly and can adversely affect trade and consumer confidence. **Additional benefits of implementing a food safety management system also exist e.g. improved resource management, reduced food waste, better detection of fraud and tampering (including bioterrorism).**

International food trade and foreign travel are increasing, bringing important social and economic benefits. But this also makes the spread of illness around the world easier. Eating habits too have undergone major change in many countries over the last two decades and new food production, preparation and distribution techniques have developed to reflect this. Effective hygiene control, therefore, is vital **safe food practices including Good Hygiene Practices (GHP) and application of a Hazard Analysis and Critical Control Point (HACCP) system are therefore essential** to avoid the adverse human health and economic consequences of foodborne illness, foodborne injury, and food spoilage.

Everyone, including farmers and growers, manufacturers and processors, food handlers and consumers, has a responsibility to assure that food is safe and suitable for consumption.

Paragraph 2

Option A is preferred. There is no added value to option B since, for example, there seems to be a repetition of paragraph 1 in the last paragraph of Option B.

Paragraph 6

An additional objective is proposed after the second bullet:

- **Clarify the relation between good hygienic practices** (or the wording which will be used, see general comments) **and a HACCP-based approach, taking account of the size of the establishment and nature of the food business activity.**

Rationale: These are the main reasons for the revision: try to improve the understanding of how both parts should be integrated into a food safety management system and how they can be adapted in a risk-based way.

Paragraph 15 (definitions)

- The need for additional definitions should be considered when further developing the document while keeping in mind that the text should remain simple. Whether a definition of "operational prerequisite program" is needed, depends on the decision on whether this concept is developed in the document. The EUMS preference is to include it in the document, in line with ISO 22000.
- "Cleaning": The EUMS would like to amend the definition as follows, mainly because the meaning of "objectionable" is unclear: **"Cleaning:** The removal of soil, food residues, dirt, grease or other objectionable **unwanted** matter **or contaminants detectable through organoleptic evaluation .**
- The following definition of "Disinfection" is proposed: "*The destruction of microorganisms on surfaces by the use of hygienically satisfactory chemical or physical agents or processes, so as to reduce the number of microorganisms to a level that will not cause harmful contamination of food that may come in contact with the disinfected surfaces.*" Rational: cleaning also reduces the number of microorganisms, maybe to a sufficiently low number, and uses chemical agents (cleaning agents) and physical methods (mechanical removal). The difference to disinfection is, that cleaning aims to remove (dirt and) the microorganisms, while disinfection aims to kill/inactivate/destroy them. The proposed definition correlates largely with the definition given by the ICMSF (International Commission on Microbiological Specifications for Foods) in the book "Microbial Ecology of Foods, Vol I".
- The following change is proposed to the definition of "Prerequisite programs": "Procedures and actions taken to maintain hygienic conditions ~~throughout the food chain~~ **in a food establishment or during transport,** that provide the foundation for the HACCP system." Rational: A fundamental difference for correct understanding of prerequisites and HACCP is, that PRPs (of course should finally cover the whole food chain, but) are primarily not longitudinally integrated over the whole food chain, whereas HACCP is applied over the whole food chain: food business operators can apply PRPs in their establishments without regard to the other parts of the food chain³, but should exchange information about their current status of special hazard control and should coordinate/ harmonize their HACCP systems in order neither to forget a significant hazard (of the future end product) nor control a hazard that would be controlled by a customer anyway.

- The EUMS agree on the proposed change of the definition of "primary production" however "hunting" must be added as an example since by the deletion of "slaughter" hunting remains unclear if not added to this definition.
- As regards the definition of "corrective action" and "correction", option A is preferred to be consistent with international standards and option B is unclear/confusing. There is however a need to better explain the difference in the body of the texts e.g. by giving examples. This seems in fact simple: "correction" is an action on the non-compliant consignment if appropriate and "corrective action" is a revision of preventive measures to avoid non-compliance in future). Alternatively it could be considered that "correction" is part of 'corrective actions' and that its introduction could be confusing. The current definition of 'correction' could be incorporated into the definition of 'corrective action' to broaden that definition and ensure it covers actions to deal with current and future problems.
- EUMS would like to discuss the added value of adding the word "Hazard" to the definition of to the definition of "(Hazard) control measures". "Control measures" is common terminology within FSMS.
- The EUMS find the proposed definition of 'monitoring' to be unclear when it uses the phrase 'hazard control measure criteria'. The definitions introduce a concept of 'critical criterion' which we think is what is being referred to here. Hence we suggest that 'critical criteria' is used to replace 'hazard control measure criteria' in the definition of monitoring.
- Definition of "significant hazards": The EUMS suggest modifying it as follows: a hazard identified by the hazard analysis as having to be controlled **because it has been considered as reasonably likely to occur**.
- The EUMS can accept the other amendments to the definitions proposed.

GAMBIA

Paragraph 1: Introduction section

Issue: The choice of general introduction and an appropriate introductory paragraph.

Comment:

Gambia supports introduction section **Option A** with modification to the text in line 9 as follows:

Effective safe food practices including Good Hygienic Practices (GHPs) and application of Hazard Analysis and Critical Control Point (HACCP) system are therefore essential in avoiding the adverse **effect** of unsafe and unsuitable food **on human health**.

Rationale:

One objective of the revision is to develop a single consolidated "introduction section" which introduces the two approaches (GHPs and HACCP) for enhancing Food Safety and Suitability. Option A addresses these two concepts while Option B appears to be silent on the HACCP approach. Moreover, the concept of "eating habits" (line 6 of Option B) is very broad and could include non-Food Safety or Suitability issues, which are not the focus of GHPs and HACCP.

Paragraph 1: Introductory paragraph

Comment:

Gambia supports **Option A** with an additional sentence as follows:

This document shows how Food Safety and Suitability can be enhanced throughout the food chain from primary production to the final consumer, including manufacturing and distribution. **Its provides guidelines for national governments to establish appropriate oversight, and businesses to establish its own control system taking into account its specific requirements.**

Paragraph 6: Objectives

The Gambia is of the opinion that the preamble in paragraph 6 should be rephrased to reflect the title of the document as follows:

The *General Principles of Food Hygiene* for **Food Safety and Suitability**: *Good Hygienic Practices (GHPs) and Hazard Analysis and Critical Control Point (HACCP) system* aims to....

Paragraph 13: Basic Principles for a Food Safety control system

Issue: Line (l): The issue of "GHPs and HACCP is a two phase /component process".

Comment:

Gambia supports the proposed draft text in line (i) of paragraph 13 (*GHPs and HACCP is a two phase /component process*). A robust Food Safety system that maximizes Food Safety and Suitability should give consideration to flexibility in the implementation of GHPs and HACCP where necessary. Therefore, the two concepts “**phase or component**” could be used interchangeably and that the critical principle to consider is the need to establish and implement HACCP only after GHPs have been established. The current proposed draft revision sufficiently addresses this principle.

Issue: Line (III): Delete “**whether hazardous or not**” from the text. Replace the original sentence with “**GHPs should ensure that food is produced in a sanitary environment and reduces the burden of contaminants**”.

Rationale:

The deletion and replacement are necessary because by their nature food contaminants have the potential to cause adverse health effect on human and the mere presence of contaminants may compromise Food Safety or Food Suitability.

Paragraph 14: Definitions

Issue: Definitions specific to HACCP system

Definitions for **Corrective actions** and **Correction**:

Comment:

Gambia supports the definition **Option A** (based on ISO 9000) which states:

Corrective action: *[Action on the process or the environment to eliminate the cause of a detected nonconformity and to prevent its recurrence].*

Correction: *[Action to eliminate a detected nonconformity.]*

The ISO definitions have been harmonized by over 180 ISO members' countries many of whom are also Codex members, moreover, these definitions have been widely adopted and implemented by the food industry. Hence, in the spirit of harmonization, CCFH should adopt the ISO definitions.

Issue: Definitions for **Validation**

Comment:

Gambia recommends the replacement of the current revised definition for **Validation** with the definition in ISO 9000, which states: “*Confirmation, through the provision of objective evidence, that the requirements for a specific intended use or application have been fulfilled.*”

The current revised definition for Validation is narrow and does not account for activities such as confirming Flow Diagram, which is also seen as a Validation activity. The ISO 9000 definition presents a more inclusive approach.

GHANA

Introduction**Paragraph 1**

Comments: Ghana supports Option A with modification to the text in line 9 as follows:

Effective safe food practices including Good Hygienic Practices (GHP) and application of Hazard Analysis and Critical Control Point (HACCP) System are therefore essential in avoiding the adverse **effect human health** of unsafe and unsuitable food **on human health**.

Rationale:

One objective of the revision is to develop a single consolidated “introduction section” which introduces the two approaches (GHPs and HACCP) for enhancing food safety and suitability. Option A addresses these two concepts whilst option B appears to be silent on the HACCP approach. Moreover, the concept of “eating habits” (line 6 of option B) is very broad and could include non-food safety or food suitability issues which are not the focus of GHPs and HACCP.

Paragraph 2

Comments: Ghana supports Option A with modification as follows:

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 goal, each business establishes its own control system taking into account its specific requirements. **It also provides guidelines for government oversight.**

Objectives paragraph 6:

Comments: rephrase the preamble in paragraph 6 to reflect the title of the document.

The *General Principles of Food Hygiene for **Food Safety and Suitability** ~~Food Suitability and Safety~~: Good Hygienic Practices (GHPs) and Hazard Analysis and Critical Control Point System (HACCP)* aims to:

Paragraph 13: Basic Principles for a food safety control system

Comments: delete “whether hazardous or not” from the text to avoid misinterpretation of the requirements. The sentence should read as follows:

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

Rationale:

Some food contaminants are hazardous and have the potential to cause adverse health effect on humans, however, even if not hazardous the mere presence of a contaminant in food may render the food unsuitable for human consumption.

“Phase or Component”

Issue for comment: A proposal is being made on which of the terms “phase or components” is more appropriate within the context of implementation of GHPs and HACCP.

Comments

One of the objectives of the revision of the GPFH is to better highlight the importance of Good Hygienic Practices (GHP) and Hazard Analysis and Critical Control Point (HACCP) as vital tools for promoting food safety and food suitability. GHPs are necessary to maintain the hygienic environment required for the production of safe and suitable food. HACCP on the other hand presents a more scientific and logical approach for addressing food safety hazards. Thus both GHPs and HACCP are important pillars needed to develop and maintain an effective food safety system. In our view the terms “phase or components” are interchangeable and that the critical principle to consider is that GHPs must form the foundation for implementing any HACCP Programme. This principle has been adequately elaborated in the revised introduction section of the GPFH.

Definitions specific to HACCP

Definition for Corrective Action and correction

Option A (based on ISO 9000)

Corrective action [Action *on the process or the environment* to eliminate the cause of a detected nonconformity *and to prevent its recurrence.*]

Correction [Action to eliminate a detected nonconformity.]

Option B (US)

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).]

Comments: Ghana supports the definition in Option A which is based on ISO 9000.

Rationale: The ISO definition has been harmonized by the over 180 ISO member countries many of whom are also Codex members, moreover this definition has been widely adopted and implemented by the food industry. Hence in the light of harmonization CCFH should adopt the ISO definition to facilitate better integration of ISO and CODEX requirements which are necessary for food safety.

Definition for Validation

Comments: Replace the revised definition with definition in ISO 9000 since this is more inclusive

ISO 9000 definition for Validation

Confirmation, through the provision of *objective evidence*, that the *requirements* for a specific intended use or application have been fulfilled.

Rationale

The revised definition for “validation” is narrow and does not account for activities such as confirming flow diagram which is also considered as a validation activity. The ISO 9000 definition presents a more inclusive approach.

KENYA

13. Further discussion is needed on the following points:

- **The appropriate scope of the HACCP system:** several participants expressed the opinion that the HACCP system is applicable to any kind of food business all along the food chain, including the primary production, even if there is no CCP.
- **New concepts:** one respondent considered that GHPs are control measures and suggested to use the concepts of GHP-based control measures and Hazard-based control measures as in “*Guidelines for the Control of Campylobacter and Salmonella in Chicken Meat (CAC/GL 78-2011)*”, and “*Guidelines for the Control of Non-typhoidal Salmonella spp. in Beef and Pork Meat (CAC/GL 87-2016)*”, and to modify other definitions accordingly.
- The general meaning of the terms ‘**corrective action/correction**’: two options were proposed but the participants of the EWG could not agree on the most appropriate one;
- If the most appropriate way to describe the HACCP system relates to a ‘**two-phase process**’ (underlining that GHPs are to be designed before the HACCP plan is established) vs. a ‘**two-component**’ process (meaning that GHPs and HACCP can be designed at the same time).

Regarding the amendments and revisions in Appendix I, should pay attention to:

- The appropriateness of an introductory paragraph to the General Introduction section, with the scope to explain the importance of the standard CAC/RCP 1-1969 and to provide general information regarding the international context it is part of;
- Determining if the concepts of ‘GHP-based control measures’ and ‘HACCP-based control measures’, which have been recently used in Codex documents, could be appropriate for the revision of CAC/RCP 1-1969.
- The need for additional definitions, including: Potential hazard; Food business operator (FBO); Operational Prerequisite Program.
- The improvement of proposed or existing definitions, including: Environment, Food safety and Food suitability, Primary production.
- The deletion of ‘**condition of**’ in the definition of Hazard
- The deletion of ‘**eliminate**’ from the definition of CCP.
- To consider the exact meaning of the terms ‘**Corrective action**’ and ‘**Correction**’ and to agree on related definitions.

Appendix I PROPOSED DRAFT REVISION OF THE *GENERAL PRINCIPLES OF FOOD HYGIENE (CAC/RCP 1-1969)* (at Step 3)

GENERAL PRINCIPLES OF FOOD HYGIENE FOR FOOD SAFETY AND SUITABILITY: GOOD HYGIENIC PRACTICES (GHPs) AND HAZARD ANALYSIS AND CRITICAL CONTROL POINT SYSTEM (HACCP)

INTRODUCTION

1.

Option A:

{ Consumers worldwide have high expectations regarding food safety and food suitability. Even if food safety remains the most important concern of modern societies, new requests become more and more important to improve the health and the welfare of people regarding their food consumption². The importance of food safety and food suitability cannot be over emphasized as they ensure the prevention of food borne illness and injuries and promote acceptability of food for human consumption. Food borne illnesses and injuries are not desirable and can be fatal. Some hidden foodborne injuries include psychological trauma. Food spoilage is wasteful, costly and adversely affects trade and consumer confidence. Effective safe food practices including Good Hygienic Practices (GHP) and application of Hazard Analysis and Critical Control Point (HACCP) System are therefore essential in avoiding the adverse human health of unsafe and unsuitable food. Such a two-phase/component approach will also provide assurance of the safety and suitability of food, adequately protect consumers from illness or injury caused by food and maintain consumer confidence.}

COMMENT

Kenya supports **option A** for it is concise and connects GHP and HACCP.

Option B: ~~as in CAC/RCP 1-1969~~

~~{ People have the right to expect the food they eat to be safe and suitable for consumption. Foodborne illness and foodborne injury are at best unpleasant; at worst, they can be fatal. But there are also other consequences. Outbreaks of foodborne illness can damage trade and tourism, and lead to loss of earnings, unemployment and litigation. Food spoilage is wasteful, costly and can adversely affect trade and consumer confidence.~~

~~International food trade, and foreign travel, are increasing, bringing important social and economic benefits. But this also makes the spread of illness around the world easier. Eating habits too, have undergone major change in many countries over the last two decades and new food production, preparation and distribution techniques have developed to reflect this. Effective hygiene control, therefore, is vital to avoid the adverse human health and economic consequences of foodborne illness, foodborne injury, and food spoilage. Everyone, including farmers and growers, manufacturers and processors, food handlers and consumers, has a responsibility to assure that food is safe and suitable for consumption.~~

~~These General Principles lay a firm foundation for ensuring food hygiene and should be used in conjunction with each specific code of hygienic practice, where appropriate, and the guidelines on microbiological criteria.~~

~~The controls described in this General Principles document are internationally recognized as essential to ensure the safety and suitability of food for consumption. The General Principles are commended to Governments, food business operators (including individual primary producers, manufacturers, processors, food service operators and retailers) and consumers alike.~~

2.

Option A:

{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 goal, each business establishes its own control system taking into account its specific requirements.}

COMMENT

Kenya supports **option A** as it put responsibility of producing safe and suitable for intended use. However, the role of the government should be reflected in option A.

Option B:

~~{This Introduction will outline the general principles that should be understood and followed by food businesses and help governments to establish appropriate oversight. It will then define specific terms and expressions applicable to the document.}~~

² For instance, food preferences are not the same for different categories consumers, making food which is safe possibly not suitable to certain categories. Thus, food must not only be safe but must also be suitable to meet the dietary needs of target consumers.

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

Bullet 4 - 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].

COMMENT: We propose to delete the '**e.g. administration of veterinary drugs**' and end at the last word of 'production' for the purpose of clarity.

13. Consumers should recognize their role by following relevant instructions and applying appropriate food hygiene measures.

BASIC PRINCIPLES FOR A FOOD SAFETY CONTROL SYSTEM

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

COMMENT: We propose to strike off the word "phase" and accepting 'component'

Justification: HACCP and GHP are being implementing together but not separately

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

COMMENT: These are consequential changes for the purpose of consistency.

Justification: HACCP and GHP are being implementing together but not separately

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

COMMENT: These are consequential changes for the purpose of consistency.

Justification: HACCP and GHP are being implementing together but not separately

15. DEFINITIONS

Definitions specific to the HACCP system

Control (verb) To take all necessary actions to ensure and maintain compliance with criteria established in the HACCP plan.

Control (noun) The state wherein correct procedures are being followed and criteria are being met.

Corrective action Any action to be taken when the results of monitoring at the CCP indicate a loss of control. (see options below)

Option A (based on ISO 9000)

~~**Corrective action** [Action on the process or the environment to eliminate the cause of a detected nonconformity and to prevent its recurrence.]~~

~~**Correction** [Action to eliminate a detected nonconformity.]~~

Option B (US)

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).]

COMMENT: We accept "option B" and propose to remove the open and close square brackets.

JUSTIFICATION: It has been domesticated to application to food control system and user friendly. It is a risk based -measures.

NIGERIA

Appendix I

Paragraph 1: Introduction section

Nigeria support Option A on the introduction section with modification to the text in line 9 as follows:

“Effective safe food practices including Good Hygienic Practices (GHPs) and application of Hazard Analysis and Critical Control Point (HACCP) system are therefore essential in avoiding the adverse ~~effect~~ human health of unsafe and unsuitable food **on human health**.”

Rationale

One objective of the revision is to develop a single consolidated “introduction section” which introduces the two approaches (GHPs and HACCP) for enhancing Food Safety and Suitability. Option A addresses these two concepts while Option B appears to be silent on the HACCP approach. Moreover, the concept of “eating habits” (line 6 of Option B) is very broad and could include non-Food Safety or Suitability issues, which are not the focus of GHPs and HACCP.

Paragraph 2: Introduction section

Nigeria support **Option A** with the following modification:

“This document shows how Food Safety and Suitability can be enhanced throughout the food chain from primary production to the final consumer, including manufacturing and distribution. ~~To achieve this goal, each business establishes~~ **It provides guidelines for national governments to establish appropriate oversight and businesses to establish its own control system taking into account its specific requirements.**”

Paragraph 6: Objectives

Nigeria support recommendation for the objectives to be rephrased as thus:

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

Paragraph 13: Basic Principles for a Food Safety control system

Line i

Nigeria support the proposed draft text in line (i) of paragraph 13 (GHPs and HACCP is a two phase /component process).

A robust Food and Safety system that maximizes Food Safety and Suitability should give consideration to flexibility in the implementation of GHPs and HACCP where necessary.

Therefore, the two concepts “**phase or component**” could be used interchangeably and that the critical principle to consider is the need to establish and implement HACCP only after GHPs have been established. The current proposed draft revision sufficiently addresses this principle.

Line iii

GHPs should ensure that food is produced in a sanitary environment and reduce the burden of contaminants, ~~whether hazardous or not~~

Rationale:

The deletion are necessary because by their nature food contaminants have the potential to cause adverse health effect on human and the mere presence of contaminants may compromise Food Safety or Food Suitability.

Paragraph 14: Definitions

Option A (based on ISO 9000)

Nigeria support the definition **Option A** (based on ISO 9000) which states:

Corrective action: [Action on the process or the environment to eliminate the cause of a detected nonconformity and to prevent its recurrence].

Correction: [Action to eliminate a detected nonconformity.]

The ISO definitions have been harmonized by over 180 ISO members’ countries many of whom are also Codex members, moreover, these definitions have been widely adopted and implemented by the food industry. Hence, in the spirit of harmonization, CCFH should adopt the ISO definitions.

Definitions for **Validation**:

Nigeria recommends the replacement of the current revised definition for **Validation** with the definition in ISO 9000, which states: “**Confirmation, through the provision of objective evidence, that the requirements for a specific intended use or application have been fulfilled.**”

The current revised definition for Validation is narrow and does not account for activities such as confirming Flow Diagram, which is also seen as a Validation activity. The ISO 9000 definition presents a more inclusive approach.

NORWAY

Due to experienced problems with access to the Electronic Platform for the EWG, we have neither been able to view the documents nor give comments to the EWG. We are therefore looking forward to more information on how to use the platform for EWGs in future work.

(i) General comments;

1.

Norway is of the opinion that the guidance should have a more integrated approach within the frame of a Food Safety Management System. The document should describe the connection between Critical Control Points (CCPs), Operational Prerequisite Programmes (oPRPs) and Prerequisite Programmes (PRPs) in the context of a Food Safety Management System (FSMS).

Principle 1 of the HACCP study should always be done to identify biological, chemical and physical hazards to be controlled. It should be emphasized that hazards can be controlled by one or more of the three categories of control measures. The prerequisite programs have to be planned to control the food safety hazard levels in the product and product processing environment.

ISO 22000:2005 is a well-established global standard for food safety in the food chain and there is now an ongoing work to draft a new version of the standard. It could be considered to coordinate the development of the two documents.

2.

Norway does not support two types of CCP because this is confusing. It is better to use the approach given in ISO 22000:2005 with Operational Prerequisite Program (oPRP) for CCP Type B.

3.

For consistency CCP and HACCP in CCFH documents and CCFFP documents should as much as possible be in line and harmonized.

(ii) Specific comments:

Norway suggests including aquaculture in the note under definition of PRP and the definition of Primary production.

Norway supports including additional definitions for Potential hazard, Food business operator (FBO) and Operational Prerequisite Program (oPRP). It could be appropriate also to include a definition for GMP.

We could also support to the deletion of "condition of" in the definition of Hazard, and the deletion of "eliminate" from the definition of CCP, although this is not in line with ISO 22000:2005.

PHILIPPINES

General Comments:

The Philippines supports the revision of CAC/RCP 1-1969 based on the current approach that the EWG has implemented. The current EWG approach includes a step-wise approach in preparing drafts (*i.e.*, focus only on the first part of the document without the sections on General Principles of Food Hygiene and HACCP system), keep in line with the present HACCP principles, and focus on monitoring of hazard control measures. We will also support the continued establishment of an EWG and the use of modern technologies in soliciting comments but it should be coupled with the direct mailing to all members registered in the EWG.

1. In Appendix 1, Title of the document

From	To
GENERAL PRINCIPLES OF FOOD HYGIENE FOR FOOD SAFETY AND SUITABILITY: GOOD HYGIENIC PRACTICES (GHPS) AND HAZARD ANALYSIS AND CRITICAL CONTROL POINT SYSTEM (HACCP)	GENERAL PRINCIPLES OF FOOD HYGIENE: FOR FOOD SAFETY AND SUITABILITY: GOOD HYGIENIC PRACTICES (GHPs) AND THE HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM

Rationale:

We suggest the removal of "for food safety and suitability" from the title because it is redundant with the definition of food hygiene. Small "s" instead of capital "S" in GHP to be consistent with the other texts in the guidelines. Inclusion of the word "the" to separate the HACCP System from GHPs.

Insert (HACCP) before system; HACCP means Hazard Analysis and Critical Control Point and not Hazard Analysis and Critical Control Point System.

2. Introduction, paragraph no. 1, page 4

We support Option B, with proposed minor change in the last sentence, stated as:

"The General principles are ~~commended~~ **applicable** to governments, food business operators (including individual primary producers, manufacturers, processors, food service operators, retailers.) and consumers alike.

Rationale

Option B is consistent with the original introduction, with some minor modifications.

3. Introduction, paragraph no. 2, page 4

We support Option B paragraph:

Rationale:

The proposed paragraph explains the use of the Introduction section, *i.e.*, outline the general principles that should be understood and followed.

4. Introduction, paragraph no. 3, page

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

Rationale:

Removal of “for Food Safety and Suitability” for the consistency in the proposed title of the document

5. Introduction, paragraph no. 5, page 5

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

Rationale:

The acronym “HACCP” does not include the term “system” and it is presumed that the HACCP being pertained to in the documents is for food safety. This is also consistent with the previous title of the Annex on “HACCP System and Guidelines for its Application.”

6. Objectives, paragraph no. 6, page 5

From	To
The General Principles of Food Hygiene for Food Suitability and Safety: Good Hygienic Practices (GHPs) and Hazard Analysis and Critical Control Point System (HACCP) aims to:	The General Principles of Food Hygiene for Food Suitability and Safety : Good Hygienic Practices (GHPs) and Hazard Analysis and Critical Control Point (HACCP) System aims to:

Rationale:

For consistency throughout the document.

7. Objectives, paragraph no. 6, 1st bullet, page 5

From	To
identify the good hygienic practices applicable throughout the food chain (including primary production through to the final consumer) to provide food that is safe and suitable for human consumption.	identify the good hygienic practices applicable throughout the food chain (including primary production through to the final consumer) to provide food that is safe and suitable for human consumption.

Rationale:

For consistency throughout the document.

8. Objectives, paragraph no. 6, 2nd bullet, page 5

From	To
recommend an HACCP-based approach as a means to enhance food safety	recommend an HACCP-based approach as a means to enhance food safety

9. Scope, paragraph no. 7, page 5

From	To
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 ³ , as appropriate.	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 (FBOs) and countries ³ , as appropriate.

Rationale

For consistency throughout the document.

10. Subtitle: Roles of governments, food business operators and consumers, page 6

From	To
Roles of Governments, food business operators, and consumers	Roles of Governments, food business operators FBOs , and consumers

11. Roles of Governments, food business operators, and consumers, paragraph no. 11, bullet no. 1, page 6

From	To
protect consumers adequately from illness or injury caused by food; policies need to consider the vulnerability of the population, or of different groups within the population;	protect consumers adequately from illness or injury caused by food; policies need to consider the vulnerability of the population, or of different groups within the population;

Rationale:

We propose to use a more general statement without the word “adequate,” as this may connote a method of measurement and evaluation on the part of government.

12. Roles of Governments, food business operators, and consumers, paragraph no. 11, bullet no. 2, page 6

From	To
provide assurance that food is suitable for human consumption;	provide assurance that food is safe and suitable for human consumption

Rationale:

For consistency throughout the document.

13. Roles of Governments, food business operators, and consumers, paragraph no. 11, bullet no. 4, page 6

From	To
provide health education programs which effectively communicate the principles of food hygiene to food business operators and consumers	provide health education programs which effectively communicate the principles of food hygiene to food business operators FBOs and consumers

Rationale:

For consistency of use of acronyms.

14. Roles of Governments, food business operators, and consumers, paragraph no. 12, bullet no. 2, page 6

From	To
ensure that consumers have clear and easily-understood information including ingredient content, by way of labelling and other appropriate means, to enable them to protect their food from contamination and prevent the growth/survival of foodborne pathogens by storing, handling and preparing it correctly	ensure that consumers have clear and easily-understood understanding of information including ingredient content by way of proper labelling and other appropriate means, to enable them to protect their food from contamination and prevent the growth/survival of foodborne pathogens by storing, handling and preparing it correctly.

Rationale:

To simplify and provide clearer and more concise thought.

15. Basic Principles for a Food Safety Control System, items i, ii, vi, page 6

From	To
[phase/component]	phase

Rationale:

It is more appropriate to use “phase” in the statements as we defined GHPs as pre-requisite programs. This means that GHPs provide the foundation for the HACCP system and therefore the first phase prior HACCP.

16. Basic Principles for a Food Safety Control System, item iii, page 6

From	To
GHPs should ensure that food is produced in a sanitary environment and reduce the burden of contaminants, whether hazardous or not	GHPs should ensure that food is produced in a sanitary environment and reduce the <u>burden</u> <u>occurrence</u> of contaminants, whether hazardous or not

Rationale:

To be consistent with the definition of contamination.

17. Basic Principles for a Food Safety Control System, item viii, page 6

From	To
HACCP should determine validated hazard control measures that are essential to increase the level of food safety.	HACCP should determine validated hazard control measures that are essential to increase the level of food safety.

Rationale:

We propose to delete “increase the level of” in the statement as there is no level of food safety, only food that is safe or unsafe.

18. Basic Principles for a Food Safety Control System, item x, page 6

From	To
Changes in the food business, e.g. new process, new ingredient, new product, new equipment,	Changes in the food business <u>operations</u> , e.g. new process, new ingredient, new product, new equipment,

Rationale:

We propose to add the word “operations” to make it more specific.

19. Definitions, page 7

We propose to re-sequence the document by placing the section on Definition after the section on Use.

To be consistent with the original document.

20. Definitions, paragraph 15, primary production, page 7

We propose the following definition for primary production:

Primary production refers to the production, rearing or growing of primary products, including growing and harvesting of crops, milking and farmed animal production up to slaughter, rearing and growing of fish and other seafood in aquaculture ponds, fishing, and the hunting and catching of wild products.

Rationale:

To provide clear distinction between primary production and processing

21. Definitions, paragraph 15, corrective action and correction , page 7

We propose to consider the definitions proposed by the US because it makes a clear distinction between corrective action and correction and provided some examples.

22. Definitions, proposed additional definitions: food business operators

We propose to define Food Business Operators (FBOs), as follows:

Food Business Operator (FBO) – refers to a person engaged in the food business including one’s agents and is responsible for ensuring that the requirements of food safety are met by the food business under one’s control.

Rationale: The term Food Business Operators (FBOs) is widely used in the document so we propose to include its definition (derived from Philippine Food Safety Act of 2013) to give better understanding of what the term really means.

SENEGAL

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

Position du Sénégal :

Le Sénégal 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 du Sénégal : Le Sénégal soutient l'**Option A**, moyennant l'ajout de la phrase suivante : Le présent document montre la manière dont la sécurité et la salubrité **des** 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 du Sénégal:

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 **dangers** ~~risques aux~~ et **maîtrises des points critiques** (HACCP) visent à....*

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

Question:

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

Position du Sénégal:

Le Sénégal soutient le projet proposé à la ligne (i) du paragraphe 13 (*BPH et HACCP est un processus à deux phases ou composantes*).

Justification:

Un système ~~de sécurité alimentaire solide~~ **adapté** visant à optimiser la sécurité et la salubrité des aliments ~~alimentaires~~ doit garder une certaine flexibilité dans la mise en œuvre des **BPH** 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 du Sénégal:

Le Sénégal 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 du Sénégal:

Le Sénégal 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.

THAILAND

General comment

1. For the approach proposed for the differential management of CCPs depending on the type of monitoring, we are of the opinion that the concept of HACCP should stay the same without differential management of CCPs since the present concept can still control safety of food very well. The unnecessary change will not only affect the Codex standards which refer to CAC/RCP 1-1969 but also the regulations and applications established globally by the governments and food business operators.

The determination and management of CCP should be able to effectively control the hazard. The CCP does not have to be divided into two types by how to monitor. Instead, different approaches of monitoring or various corrective actions for deviation at different CCPs can be further explained in the related sections.

2. For the use of Hazard-based control measure and GHP-based control measure in accordance with the Guidelines for the Control of *Campylobacter* and *Salmonella* in Chicken Meat (CAC/GL 78-2011), we think that the concept may cause more confusion to the user of this standard. There will be the need for explaining and elaboration of these new terms.

The establishment of HACCP is based on controls by various prerequisite programmes and CCP. Now, the HACCP concept is well understood. There is no need to set up different terms and definitions especially to categorize into two types such as

- hazard vs significant hazard
- control measure vs hazard control measure
- critical criterion vs critical limit

- correction vs corrective action

3. We would also like to ask for clarification about the concept of 'phase' and 'component' for the relationship between GHP and HACCP

For a two-component process: Some types and sizes of food businesses may not necessarily need to implement HACCP because GHP has already provided sufficient control. Do these kinds of food businesses able to implement only GHP?

Also, can the certification of GHP and HACCP for this two-component/phase process be separated as present?

Now, GHP and HACCP can be implemented separately, at the same time, or step by step. So, the use of the words 'component' or 'phase' may also create more questions to the users of the standards.

Specific comment

Title

Thailand would like to propose the amendment to the title as follows:

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

Rationale: The words 'food suitability and safety' should be reflected in the context such as an Introduction or Objective instead of the title of the document.

Introduction

paragraph 1

Thailand prefers Option B as appeared in the current RCP1.

Rationale: We think that food preferences should not be included during the consideration of this revision. Codex standard should focus on safety issue and minimum requirements to suit human consumption but not expectation or preferences.

Furthermore, the definition of "food suitability" still lacks of clarity. We would like to ask for a clarification of the word 'suitability'. What is the scope of its use in this standard? Does it include spoilage, preferences, or dietary requirements? If preferences and dietary requirement are included in the word 'suitability', it is beyond the scope of CCFH and this RCP1 document.

Paragraph 2

We would like to propose the following amendment:

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~~.

Rationale: There is no need to highlight 'manufacturing and distribution' since it is already covered under the words 'from primary production to the final consumer'.

ZAMBIA

Paragraph 1: Introduction section

Issue: The choice of General introduction and an appropriate introductory paragraph.

Position: we support introduction section of **Option A** with modification to the text in line 9 as follows:

Effective safe food practices including Good Hygienic Practices (GHPs) and application of Hazard Analysis and Critical Control Point (HACCP) system are therefore essential in avoiding the adverse **effect** of unsafe and unsuitable food **on human health**.

Rationale:

One objective of the revision is to develop a single consolidated "introduction section" which introduces the two approaches (GHPs and HACCP) for enhancing Food Safety and Suitability. Option A addresses these two concepts while Option B appears to be silent on the HACCP approach. Moreover, the concept of "eating habits" (line 6 of Option B) is very broad and could include non-Food Safety or Suitability issues, which are not the focus of GHPs and HACCP.

Paragraph 2: Introductory paragraph.

Position: Zambian support **Option A** with an additional sentence as follows:

This document shows how Food Safety and Suitability can be enhanced throughout the food chain from primary production to the final consumer, including manufacturing and distribution. **It provides guidelines for national food safety authorities to establish appropriate oversight and businesses to establish its own control system taking into account its specific requirements.**

Paragraph 6: Objectives

Position:

Rephrase the preamble in paragraph 6 to reflect the title of the document as follows:

The *General Principles of Food Hygiene* for **Food Safety and Suitability**: *Good Hygienic Practices (GHPs) and Hazard Analysis and Critical Control Point (HACCP) system* aims to....

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:

we support the proposed draft text in line (i) of paragraph 13 (*GHPs and HACCP is a two phase /component process*). A robust Food and Safety system that maximizes Food Safety and Suitability should give consideration to flexibility in the implementation of GHPs and HACCP where necessary. Therefore, the two concepts “**phase or component**” could be used interchangeably and that the critical principle to consider is the need to establish and implement HACCP only after GHPs have been established. The current proposed draft revision sufficiently addresses this principle.

Issue: Line (iii): Delete “**whether hazardous or not**” from the text. Replace the original sentence with “**GHPs should ensure that food is produced in an environment with minimum hygienic and sanitary conditions to reduce the burden of contaminants**”.

Rationale:

The deletion and replacement are necessary because by their nature food contaminants have the potential to cause adverse health effects on human and the mere presence of contaminants may compromise Food Safety or Food Suitability.

Paragraph 14: Definitions

Definitions specific to HACCP system

Issue: Definitions for **Corrective actions** and **Correction**:

Position:

we support the definition **Option A** (based on ISO 9000) which states:

Corrective action: *[Action on the process or the environment to eliminate the cause of a detected nonconformity and to prevent its recurrence].*

Correction: *[Action to eliminate a detected nonconformity.]*

The ISO definitions have been harmonized by over 180 ISO members' countries many of whom are also Codex members, moreover, these definitions have been widely adopted and implemented by the food industry. Hence, in the spirit of harmonization, CCFH should adopt the ISO definitions.

Issue: Definitions for **Validation**:

Position:

we recommend the replacement of the current revised definition for **Validation** with the definition in ISO 9000, which states: “*Confirmation, through the provision of objective evidence, that the requirements for a specific intended use or application have been fulfilled.*”

The current revised definition for Validation is narrow and does not account for activities such as confirming Flow Diagram, which is also seen as a Validation activity. The ISO 9000 definition presents a more inclusive approach.

AFRICAN UNION

Paragraph 1: Introduction section

Issue: The choice of General introduction and an appropriate introductory paragraph.

Position: AU supports introduction section **Option A** with modification to the text in line 9 as follows:

Effective safe food practices including Good Hygienic Practices (GHPs) and application of Hazard Analysis and Critical Control Point (HACCP) system are therefore essential in avoiding the adverse **effect** of unsafe and unsuitable food **on human health**.

Rationale: One objective of the revision is to develop a single consolidated “introduction section” which introduces the two approaches (GHPs and HACCP) for enhancing Food Safety and Suitability. Option A addresses these two concepts while Option B appears to be silent on the HACCP approach. Moreover, the concept of “eating habits” (line 6 of Option B) is very broad and could include non-Food Safety or Suitability issues, which are not the focus of GHPs and HACCP.

Paragraph 2: Introductory paragraph.

Position: AU supports **Option A** with an additional sentence as follows:

This document shows how Food Safety and Suitability can be enhanced throughout the food chain from primary production to the final consumer, including manufacturing and distribution. **Its provides guidelines for national governments to establish appropriate oversight and businesses to establish its own control system taking into account its specific requirements.**

Paragraph 6: Objectives

Position: Rephrase the preamble in paragraph 6 to reflect the title of the document as follows:

The *General Principles of Food Hygiene* for **Food Safety and Suitability**: *Good Hygienic Practices (GHPs) and Hazard Analysis and Critical Control Point (HACCP) system* aims to....

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: AU supports the proposed draft text in line (i) of paragraph 13 (*GHPs and HACCP is a two phase /component process*). A robust Food and Safety system that maximizes Food Safety and Suitability should give consideration to flexibility in the implementation of GHPs and HACCP where necessary. Therefore, the two concepts “**phase or component**” could be used interchangeably and that the critical principle to consider is the need to establish and implement HACCP only after GHPs have been established. The current proposed draft revision sufficiently addresses this principle.

Issue: Line (iii): Delete “**whether hazardous or not**” from the text. Replace the original sentence with “***GHPs should ensure that food is produced in a sanitary environment and reduce the burden of contaminants***”.

Rationale: The deletion and replacement are necessary because by their nature food contaminants have the potential to cause adverse health effect on human and the mere presence of contaminants may compromise Food Safety or Food Suitability.

Paragraph 14: Definitions

Definitions specific to HACCP system

Issue: Definitions for **Corrective actions** and **Correction**:

Position: AU supports the definition **Option A** (based on ISO 9000) which states:

Corrective action: *[Action on the process or the environment to eliminate the cause of a detected nonconformity and to prevent its recurrence].*

Correction: *[Action to eliminate a detected nonconformity.]*

The ISO definitions have been harmonized by over 180 ISO members’ countries many of whom are also Codex members, moreover, these definitions have been widely adopted and implemented by the food industry. Hence, in the spirit of harmonization, CCFH should adopt the ISO definitions.

Issue: Definitions for **Validation**:

Position: AU recommends the replacement of the current revised definition for **Validation** with the definition in ISO 9000, which states: “*Confirmation, through the provision of objective evidence, that the requirements for a specific intended use or application have been fulfilled.*”

The current revised definition for Validation is narrow and does not account for activities such as confirming Flow Diagram, which is also seen as a Validation activity. The ISO 9000 definition presents a more inclusive approach.