CODEX ALIMENTARIUS COMMISSION

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World Health Organization

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Agenda Item 6 **CRD3 Rev.1**[1]

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Fifty-second Session

Virtual

28 February – 4 March and 9 March 2022

PROPOSED DRAFT DECISION TREE (REVISION OF THE *GENERAL PRINCIPLES OF FOOD HYGIENE* (CXC 1-1969)

Prepared by Brazil

based on the comments in reply to CL2021/62-FH

Background

1. This document presents an analysis of the comments received through the Codex Online Commenting System (OCS) in response to CL 2021/62-FH issued in October 2021 and published in CX/FH 22/52/6 Add.1 in January 2022.

Overview and analysis of comments received

2. Most Members and Observers supported the inclusion of a Critical Control Points (CCP) decision tree in the revised *General Principles of Food Hygiene* (CXC 1-1969), with some modifications. One Member was in favor of maintaining the existing decision tree in CXC 1-1969 prior to its revision with the inclusion of question 1 (Can the hazard be controlled at this step by GHPs?). One Observer was not in favour of introducing the proposed decision tree or any other decision tree/determination worksheet into CXC 1-1969 and recommended keeping the revised CXC 1-1969 (v2020) as it is. The majority of the respondents indicated the suitability for inclusion of Annex 1 i.e., the decision tree, although concerns were still raised regarding some aspects and proposals for modifications were made. Members emphasized that the decision tree should be flexible enough to be used by different sectors in the food production chain.

3. Decision trees are valuable tools that Food Business Operator (FBOs) can use to identify CCPs. Different decision trees have been used worldwide and as a result, two additional examples of decision trees were proposed by one Member to be included in the document. While not opposed to that, discussing these other decision trees would be time-consuming and might extend the time required to complete this work. It is important to note that the proposed decision tree is just an example of the type of tool that can be used to support CCP identification and HACCP implementation. Therefore, other decision trees/ tools could also be used as long as the requirements of the general document have been met (step 7 - Principle 2 - Determine the Critical Control Points (CCPs). To address these concerns, it is proposed to add a chapeau to the decision tree, clarifying that the proposed decision tree is just one example of the decision tree that could be used.

4. Below, the key points raised in the comments and the proposed changes to the title and questions are highlighted.

Title: Example of a CCP Decision Tree (Apply to each Step <u>where</u> a Specified <u>Significant</u> Hazard <u>is identified</u>).

5. The underlined additions are proposed to avoid suggesting that each hazard must be evaluated at each step of the process and to reinforce that the decision tree applies to hazards that were determined through the hazard analysis to be significant, as indicated in section 3.7 (“Critical Control points are to be determined only for hazards identified as significant as of the result of a hazard analysis.”) of Chapter two of CXC 1-1969.

Question 1: Can the hazard be controlled at this step by a prerequisite program (e.g., GHPs)?

6. Some participants have expressed concern that there is the potential for FBOs to simply say that a hazard is addressed by GHPs (or prerequisite programs), and thus the needed CCPs would not be identified from amongst the multitude of GHPs. There was also concern about how to consider whether the GHPs or other prerequisite programs control a hazard at a specific step, since in general GHPs/prerequisite programs that address hazards are applied more broadly than at single steps in the production process.

[1] The revision includes the insertion of the footnotes erroneously omitted under Annex 1a.

7. The suggestion is to insert a text that ensures that the hazard is being controlled enough and the incorporation of the word “significant” in question 1 emphasizes that the decision tree is used only for Significant Hazards derived from the hazard analysis. If in responding to question 1 the answer is no, the hazard would not be controlled by GHPs, then it should be addressed by HACCP plan.

New Q1: Can the significant hazard be controlled to an acceptable level at this step by prerequisite programs (e.g. GHPs)*?
* Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by prerequisite programs such as GHP. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording).

Question 2: Do control measures exist at this step?

8. Some respondents asked to include the word “specific” in question 2. The word “specific” is included to clarify that the control measure to be used at this stage is specific to this significant hazard and not part of the prerequisite programs. The incorporation of the word “significant” in question 2 emphasizes that the decision tree is planned to be used only for significant hazards.

New Q2: Do specific control measures for identified significant hazard exist at this step?

Question 3: Will a subsequent step eliminate the identified hazard or reduce its likely occurrence to an acceptable level?

9. Some respondents asked to include “prevent” in this question, because in CXC1-1969 t, the sentence “prevent or eliminate a hazard or reduce it to an acceptable level” is used.

10. Some Members asked to change the order of questions Q3 (Will a subsequent step prevent or eliminate the significant hazard or reduce it to an acceptable level?) and Q4 (Can this step prevent or eliminate the significant hazard or reduce it to an acceptable level?). This was not done because if the control measure can be used at the step being analyzed, or in any other step later in the process, the step being analyzed should not be considered as a CCP. So, before establishing a CCP it is also important to consider the subsequent steps to avoid duplication of CCPs for controlling the same hazard. If question Q4 comes first, the answer NO goes to “modify the step, process or product to implement a control measure”, but it is not applicable if there is a subsequent step that prevents, eliminates, or reduces the significant hazard to an acceptable level. On the other hand if the answer is YES, the step is a CCP because it can prevent prevent, eliminate, or reduce the significant hazard to an acceptable level; however if there is a subsequent step that does the same, probably more CCPs will be identified than are necessary to control the significant hazard. If a subsequent step controls the significant hazard, the subsequent step will be identified as a CCP too, forcing FBOs to go back to the previous CCP and remove it.

11. The word “significant” was incorporated into question 3 to emphasize that the decision tree is used only for significant hazards.

New Q3. Will a subsequent step prevent or eliminate the identified significant hazard or reduce it to an acceptable level?

Question 4: Can this step prevent, reduce, or eliminate the hazard to an acceptable level?

12. Adding the word “significant” in question 4 emphasizes that the decision tree is used only for significant hazards.

New Q4. Can this step prevent or eliminate the identified significant hazard or reduce it to an acceptable level? **

Conclusion

13. Based on the comments received and in line with the request from CCFH51, a proposal for a new decision tree is presented in Annex 1a for consideration by CCFH.

14. To address the concerns of some respondents with Annex 2 (CX/FH 22/52/6), a CCP determination worksheet (Annex 1b) can introduce exactly the same questions in Annex 1a.

Recommendations

15. CCFH is invited to consider if Q1 should be maintained in the decision tree with the new wording. Some Members think it should not be part of a decision tree to identify CCPs. However, the logical sequence should be considered.

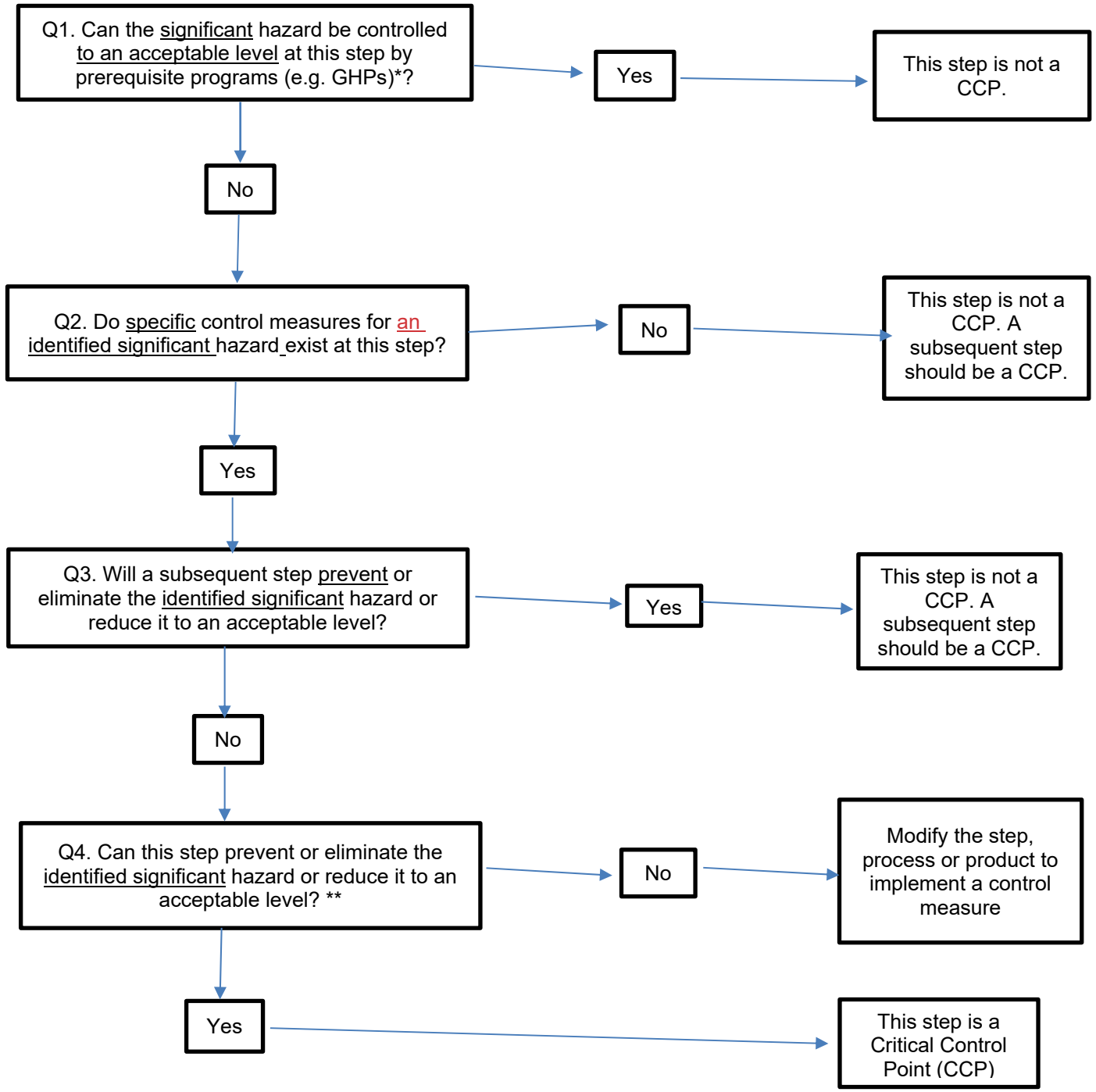
- the guidance in step 6 (Principle 1 Conduct a hazard analysis and identify control measures) is meant to help FBOs to determine significant hazards that need to be addressed in the HACCP plan (with the use of diagram 2 Example of Hazard Analysis Worksheet); the potential hazards identified at step 6 are considered, when there are significant hazards identified through hazard analysis that are not being controlled by GHPs, they should be addressed in the HACCP plan.
- Then, at step 7 (Principle 2 Determine the Critical Control Points (CCPs)), only significant hazards should be considered. The Decision Tree is only referred to at step 7. One of the main modifications in the document is the possibility of all hazards identified in hazard analysis being controlled by GHP (routine or of greater attention). Question 1 clarifies that significant hazards which can be controlled by GHP, including the ones that require GHP of greater attention are not eligible to be controlled by a CCP.

16. CCFH is invited to consider the CCP decision tree and the CCP determination worksheet that could be considered as an “Example of a CCP Decision Tree” or “Example of a CCP determination worksheet” (See Annexes 1a and 1b, respectively) and whether the two proposals are suitable for inclusion in the General Principles for Food Hygiene (CXC1-1969).

Annex 1 – Tools to Determine the Critical Control Points CCPs)

The following is an example of a decision tree and tool that can be used in the determination of a CCP. Such examples are not unique and other decision-trees or tools can be used as long as the general requirements as elaborated in CXC 1-1969 (i.e., step 7 - Principle 2 - Determine the Critical Control Points (CCPs) have been met.

Annex 1a - "Example of a CCP Decision Tree - Apply to each Step where a Specified Significant Hazard is identified."



* Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by prerequisite programs such as GHPs. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording).
** Consider whether the control measure at this step works in combination with a control measure at another step to control the same hazard, in which case both steps should be considered as CCPs.

Annex 1b - "Example of a CCP determination worksheet (Apply to each Step where a Specified Significant Hazard is identified)."

Process step	**Significant hazards**	**Q1. Can the significant hazard be controlled to an acceptable level at this step by prerequisite programs (e.g., GHPs)?**	**Q2. Do specific control measures for identified significant hazard exist at this step?**	**Q3. Will a subsequent step prevent or eliminate the identified significant hazard or reduce it to an acceptable level?**	**Q4. Can this step prevent or eliminate the identified significant hazard or reduce it to an acceptable level?**	**CCP number**
Identify process step	Describe hazard and cause	If yes, this step is not a CCP. If no, proceed to Q2.	If yes, proceed to Q3. If no, this step is not a CCP. A subsequent step should be a CCP.	If yes, a subsequent step should be a CCP (Identify the subsequent step where the hazard would be controlled). If no, proceed to Q4.	If yes, this step is a CCP. If no, modify this step, process, or product to control the hazard	Number the CCP and include in HACCP worksheet