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Session of the Codex Committee on

FOOD HYGIENE



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

3.7 Determine the Critical Control Points
(Step 7/ Principle 2)

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Determining whether or not the step at which a control measure is applied is a CCP in the HACCP system **can be helped by using a decision tree.**

A decision tree should be flexible, given whether it is for use in production, slaughter, processing, storage, distribution or other processes.

Other approaches such as expert consultation may be used.

GENERAL PRINCIPLES OF FOOD HYGIENE CXC 1-1969

Annex and Diagrams



Annex 1
Comparison of control
measures with examples

Diagram 1
Logic Sequence for
Application of HACCP

Diagram 2
Example of Hazard
Analysis Worksheet

Diagram 3
Example of HACCP
Worksheet

Example of Decision Tree
For Identification Of
Critical Control Points

PROPOSED DRAFT DECISION TREE - BACKGROUND



The 51st Session of the Committee on Food Hygiene (CCFH51) advanced the revised *General Principles of Food Hygiene (CXC 1-1969)* to CAC43 for adoption at Step 5/8.

CCFH51 further agreed to return the diagram of the decision tree for identification of critical control points (CCPs) to Step 2 for drafting by Brazil, Honduras, Jamaica and Thailand for comments at Step 3 and consideration by CCFH52

CL 2020/55-FH - **two options for decision trees** that were based on discussions and comments made at CCFH51

Based on the comments received and in line with the request from CCFH51, a proposal was presented in CX/FH 22/52/6 for consideration by CCFH (CL 2021/62/OCS-FH). Proposal of **“Example of a CCP Decision Tree”** and **“Example of a CCP determination worksheet”**.

PROPOSED DRAFT DECISION TREE - BACKGROUND



Most members and observers **support the inclusion of CCP decision tree** as Annex in the revised General Principles of Food Hygiene (CXC 1-1969), with some modifications.

One country is in favor of **keeping the decision tree that existed in the document before its revision, with the inclusion of question 1** (Can the hazard be controlled at this step by GHPs?). One observer is not in favor of **introducing the proposal or any other decision tree/determination worksheet** into CXC 1-1969.

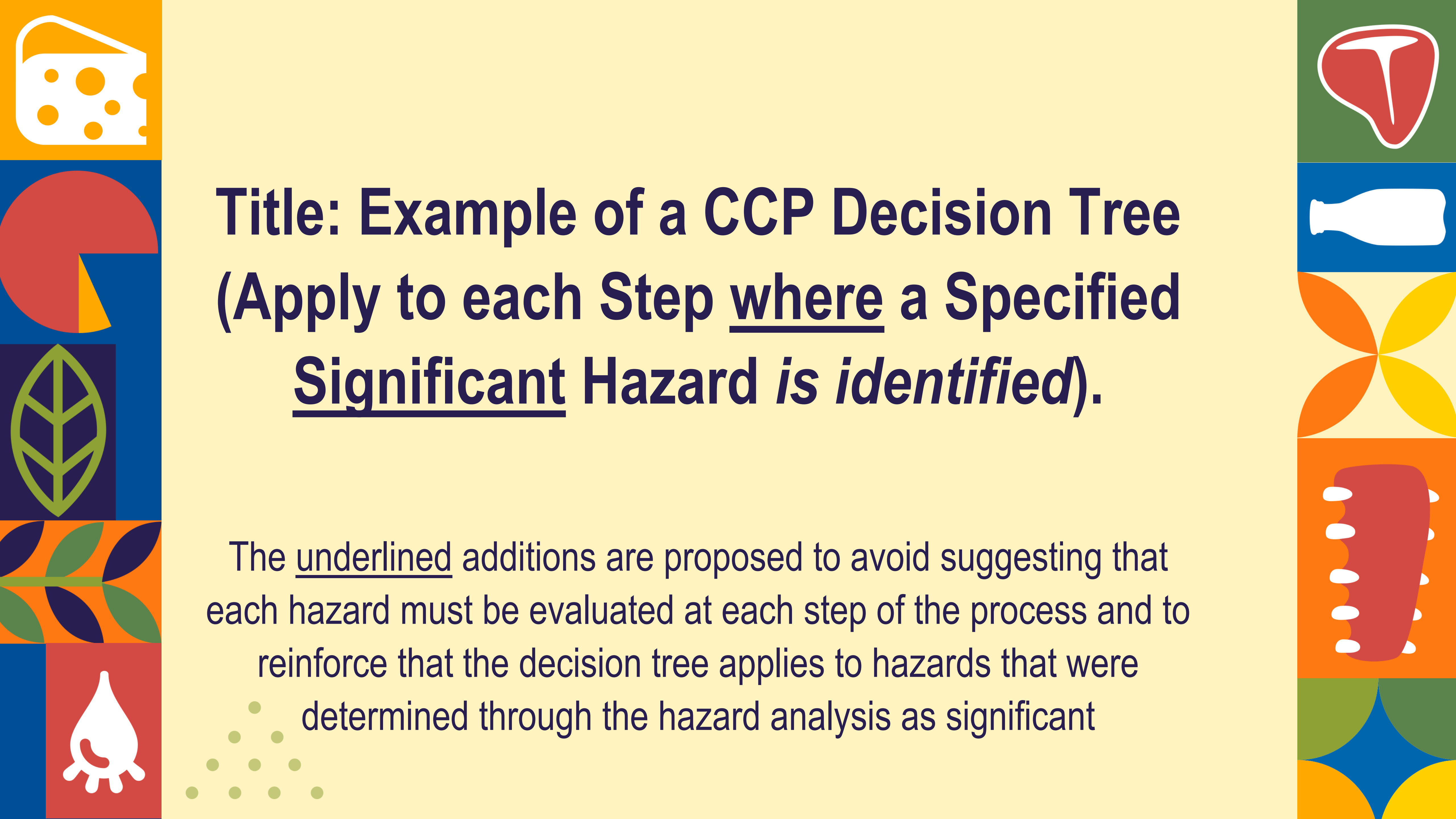
Two additional examples of decision trees were proposed to be included in the document.



KEY POINTS ADDRESSED IN A NEW PROPOSAL PRESENTED AS CRD 3




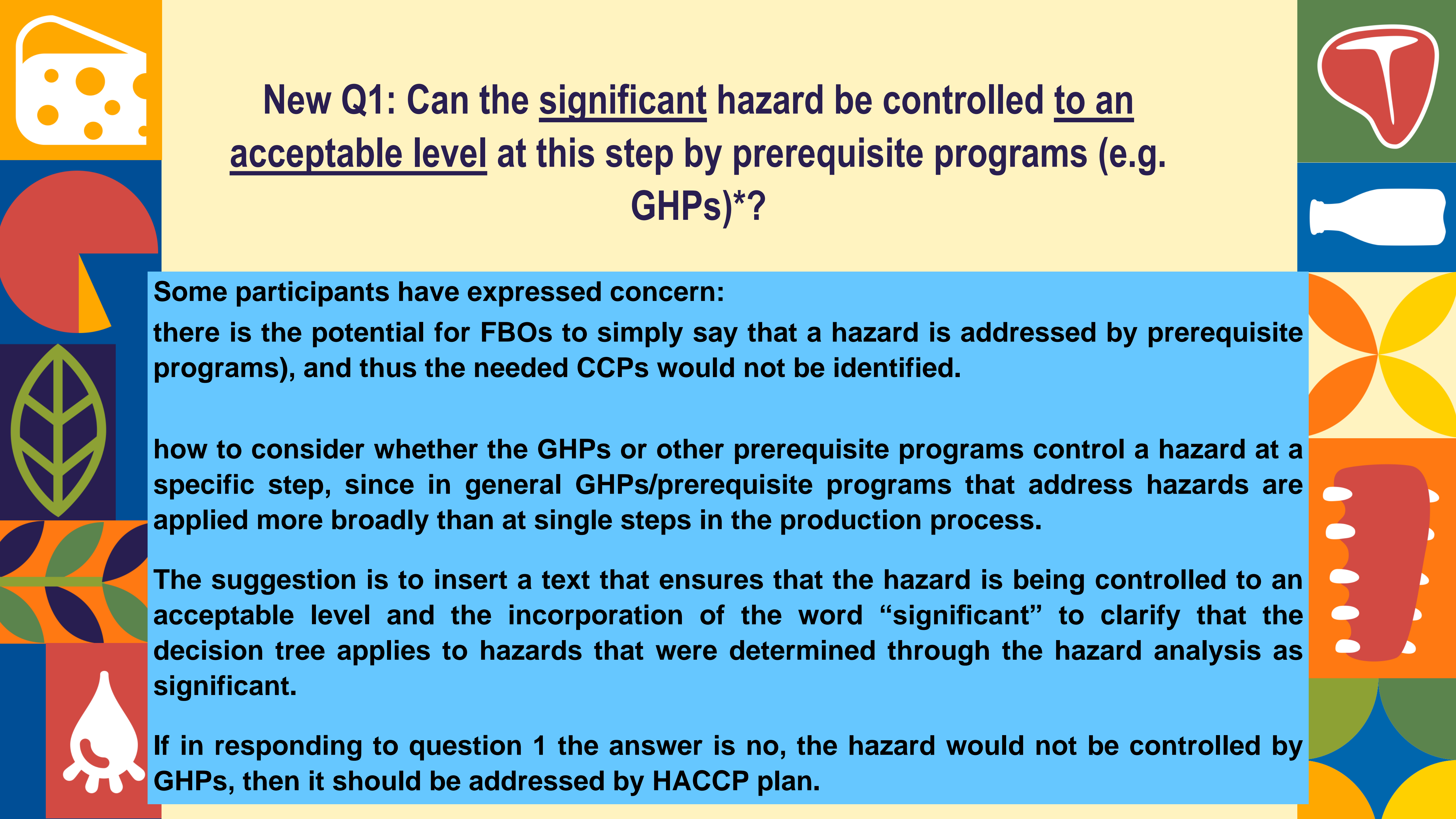
- The proposed decision tree and worksheet are **not unique** they are just examples of a CCP decision tree, then **other tools can be used** since the requirements of the general document are met (step 7 - Principle 2 - Determine the Critical Control Points (CCPs)).
- A paragraph was added to clarify that the proposed decision tree is only an example, and FBO can also use other decision tree models.



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

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 as significant





New Q1: Can the significant hazard be controlled to an acceptable level at this step by prerequisite programs (e.g. GHPs)*?

Some participants have expressed concern:

there is the potential for FBOs to simply say that a hazard is addressed by prerequisite programs), and thus the needed CCPs would not be identified.

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.

The suggestion is to insert a text that ensures that the hazard is being controlled to an acceptable level and the incorporation of the word “significant” to clarify that the decision tree applies to hazards that were determined through the hazard analysis as significant.

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

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

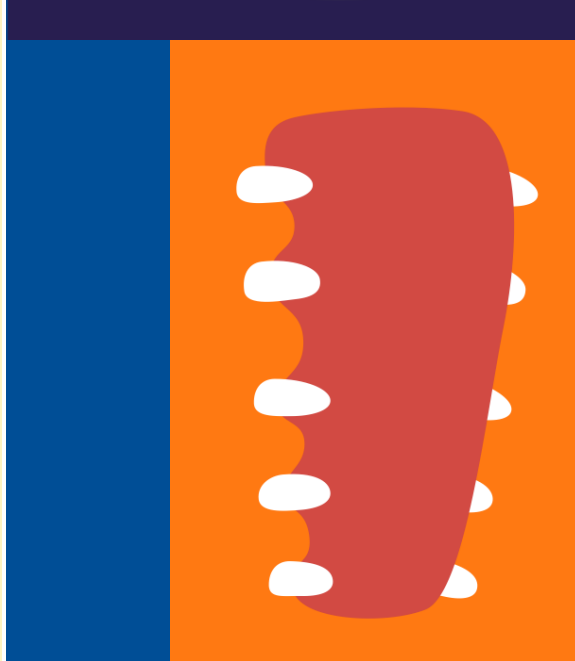
“Prevent” was included in this question, because in CXC1-1969 mentions “prevent or eliminate a hazard or reduce it to an acceptable level”.

Some Members asked to change the order of questions Q3 and Q4 (Can this step prevent or eliminate the significant hazard or reduce it to an acceptable level?).

This was not accepted because:

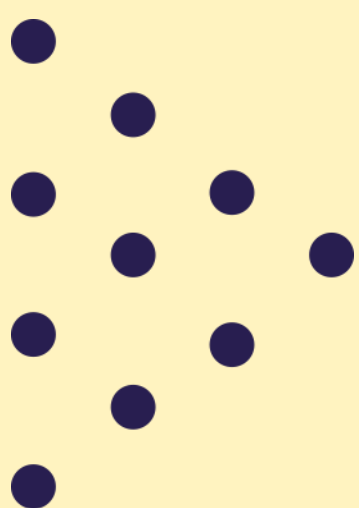
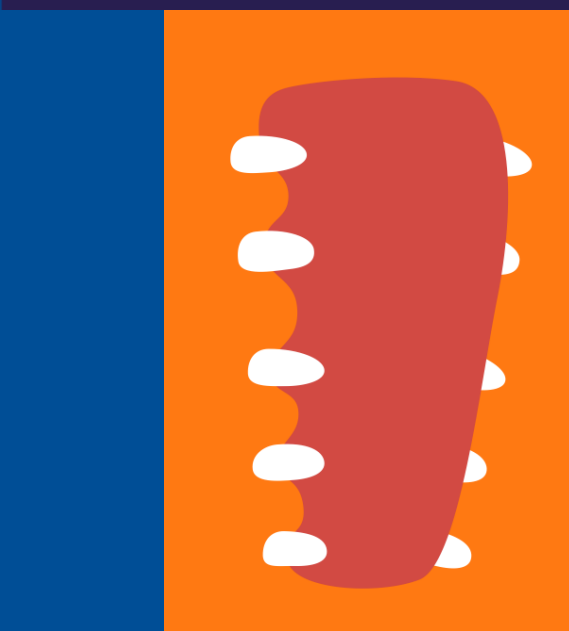
If question Q4 comes first, the answer NO goes to “modify the step, process or product to implement a control measure”, but it is not applicable if there is a subsequent step that prevents, eliminates, or reduces the significant hazard to an acceptable level.

- Before establishing a CCP it is also important to consider the subsequent steps to avoid duplication of CCPs for controlling the same significant hazard.



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

Inclusion of Significant in question 4 emphasizes that the decision tree is used only for significant hazards.




PROPOSED DRAFT DECISION TREE CONCLUSION



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.

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





PROPOSED DRAFT DECISION TREE RECOMMENDATIONS

- CCFH is invited to consider if:
 - Q1 should be maintained in the decision tree with the new wording. 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.
 - The “Example of a CCP Decision Tree” or “Example of a CCP determination worksheet” (See Annexes 1a and 1b, respectively) included in CRD3 are suitable for inclusion in the General Principles for Food Hygiene (CXC1-1969) as an additional Annex?.

THANK YOU

