



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)**

(Comments from Dominican Republic, Ecuador, Malaysia, Rwanda and ISO)

Dominican Republic

República Dominicana agradece la preparación del documento de trabajo a Brasil, Honduras, Jamaica y Tailandia.

República Dominicana apoya que los dos ejemplos de anexos de árbol de decisiones propuestos, avancen al trámite 5 y sean incorporados en los Principios generales de higiene de los alimentos (CXC 1-1969):

- Anexo I: "Ejemplo de árbol de decisión para PCC".
- Anexo II: "Ejemplo de hoja de trabajo para la determinación de PCC".

Ecuador

COMENTARIOS GENERAL

En referencia al Documento de Debate, mediante el cual "(...) se invita a los miembros del Codex y observadores a presentar sus observaciones sobre el Anteproyecto de árbol de decisión (revisión de los Principios generales de higiene de los alimentos - CXC 1-1969)"; al respecto:

Ecuador expresa su agradecimiento a todos los países que trabajan y contribuyen en la elaboración del referido Anteproyecto; en tal virtud y luego de haber realizado el análisis técnico correspondiente; el país apoyó a la nueva propuesta de "Anteproyecto del árbol de decisión para Puntos Críticos de Control – PCC"; anexo 1, considerando que el referido árbol de decisión es suficientemente flexible y se encuentra bien establecido para utilizarlo en los diferentes sectores de la cadena de producción de alimentos.

Adicionalmente, considera que un "programa de prerrequisitos", contempla las buenas prácticas de higiene y de fabricación, así como otras prácticas y procedimientos como la capacitación y la rastreabilidad, que establecen las condiciones higiénicas sanitarias, como medidas de control, para reducir al mínimo la ocurrencia y los niveles de peligros en la cadena alimentaria; garantizando así que los alimentos sean inocuos y aptos para su consumo.

Malaysia

Malaysia would like to thank Brazil, Honduras, Jamaica and Thailand for preparing the Proposed Draft Decision Tree (Revision of the General Principles of Food Hygiene (CXC 1-1969). Malaysia also appreciates the opportunity to provide comments on the Proposed Draft Decision Tree.

Malaysia agrees with Annex 1a – Example of a CCP Decision Tree - Apply to each Step where a Specified Significant Hazard is identified, to be included in the General Principles for Food Hygiene (CXC 1-1969) as sequence of questions are arranged in a step-wise approach and this provide clearer guidance to the user.

Rwanda

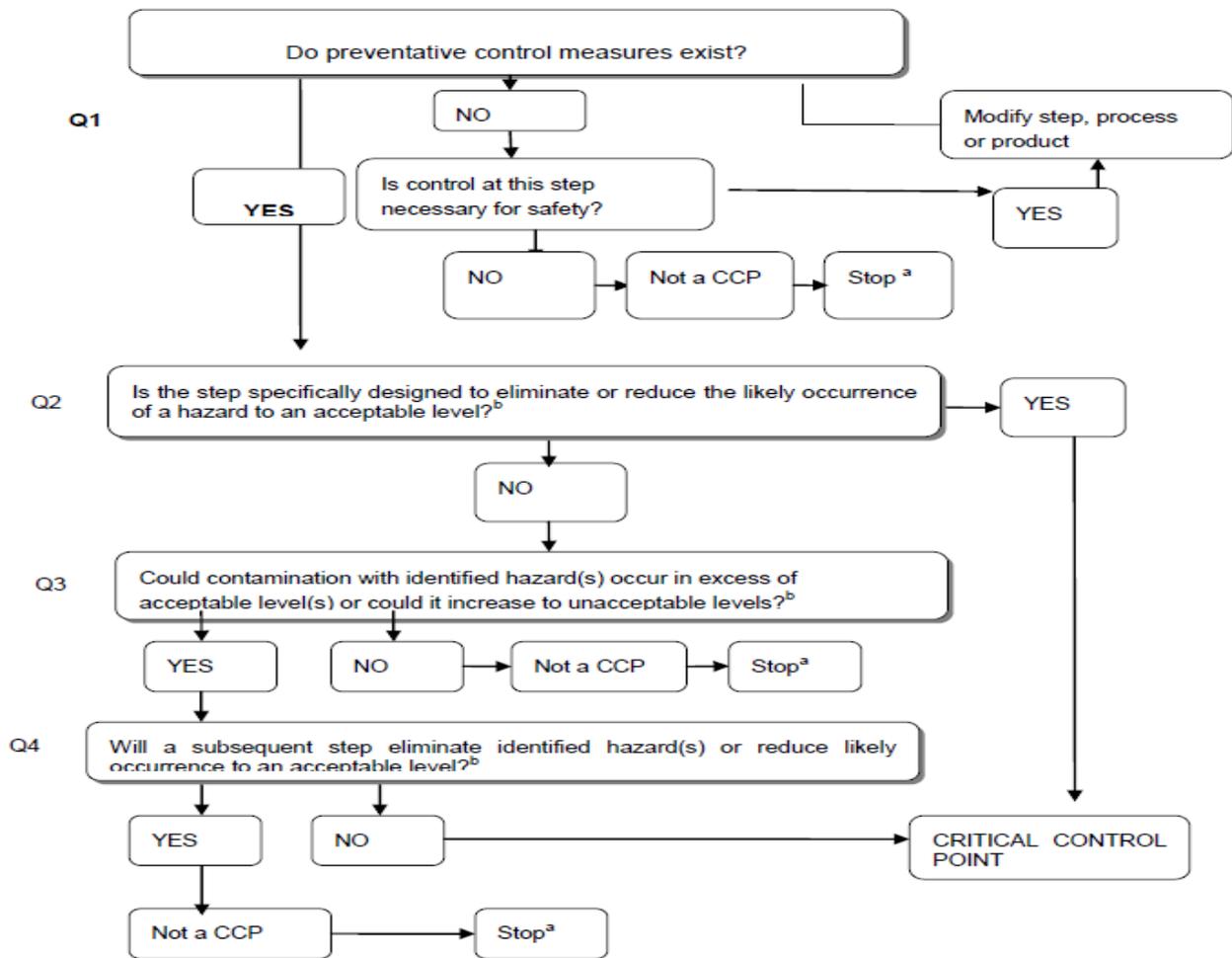
Section or Paragraph:

Recommendation 18: CCFH is invited to consider the CCP decision tree and the CCP determination worksheet that would fit as "Example of a CCP Decision Tree" or "Example of a CCP determination worksheet" (See Annexes 1 and 2, respectively) and whether either of the two proposals are suitable for inclusion in the

General Principles for Food Hygiene (CXC 1-1969)

Comment/Proposed Changes :

Rwanda supports the inclusion of the Annex 1 (Example of decision tree, **however proposes the following modifications as per the attached tree:**



a Proceed to the next identified hazard in the described process.

b Acceptable and unacceptable levels need to be determined within the overall objectives in identifying the CCPs of the HACCP plan.

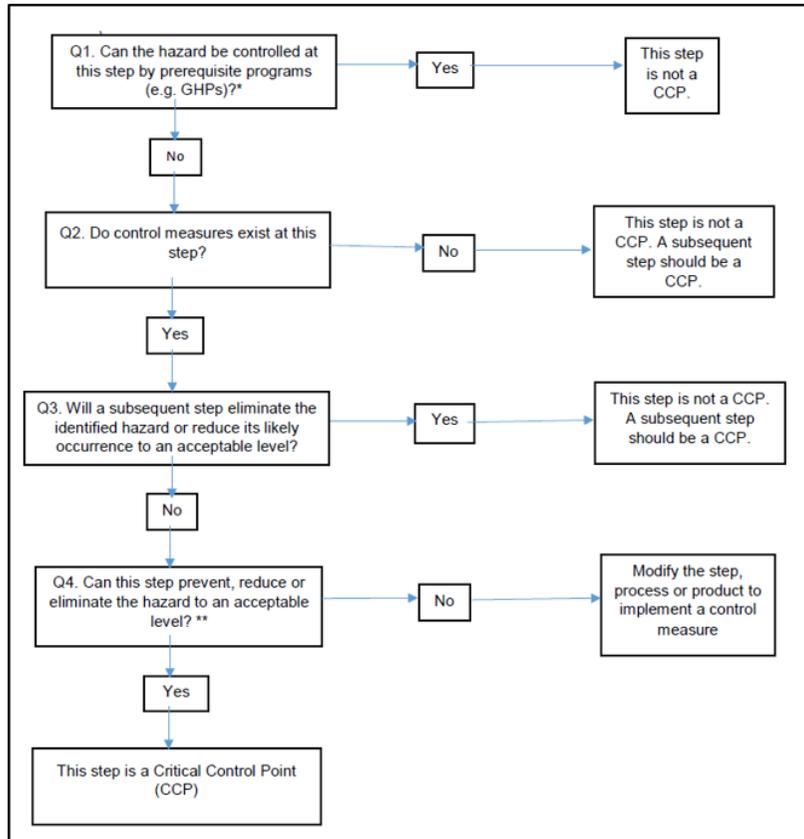
Rationale :

The proposed decision tree diagram provides systematic decision-making approach including consideration of PRP (qn 1).

ISO

General comment 1:

The decision making process in the decision tree of annex 1 is different from the decision making process in the example of a CCP determination worksheet in Annex 2. The decision making process shall be the same in the decision tree and in the worksheet.



Annex 2 - "Example of a CCP determination worksheet (Apply to each Step for a Specified Hazard)."

Process step	Significant hazards	Q1. Could the hazard be controlled at this step?	Q2. Is this step specifically designed to prevent or eliminate the hazard or reduce it to an acceptable level?	Q3. Would a subsequent step eliminate the hazard or reduce it to an acceptable level?	CCP number
Identify process step	Describe hazard and cause	If yes, proceed to Q2. If no, proceed to Q3	If yes, this is a CCP. Proceed to the last column. If no, proceed to Q3.	If yes, this step is not a CCP. Identify the subsequent step where the hazard would be controlled. If no, modify this step, process or product to control the hazard	Number the CCP and include in HACCP worksheet

General comment 2

Annexes 1 and 2 refer to “steps to prevent, eliminate or reduce hazards to acceptable levels”. According to the definitions of HACCP, it is a control measure that prevents, eliminates or reduces a hazard. Some control measures can be regarded as steps in the process, e.g. pasteurisation or sieving, other control measure can be in the process environment and may not be regarded as steps e.g. high care rooms. Control measures like cooling may not be regarded as a single step but rather as the application of product conditions at a number of steps in the process. This also applies to control measures like modified atmosphere packaging.

Proposed change

For consistent wording, whenever referring to the prevention, elimination or reduction of hazard, use the expression “control measure”.

For example:

Will a control measure at a subsequent step eliminate the hazard or reduce it to an acceptable level?

instead of

Will a subsequent step eliminate the hazard or reduce it to an acceptable level|?

Annex 1 - Decision tree

*Note * to decision tree.*

The note states:

*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 GHPs.

Comment

1 - After “control” the word “measure” is missing. Control and control measures are different concepts and have different definitions. In the note here the reference shall be to “control measures” and not to “control”.

2 - Next to the absence of control measures, also the deviations in control measures shall be included in considering the likelihood of occurrence of hazards.

Proposed change

* Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence **or deviation** of control **measures** and the severity of impact of the hazard) and whether it could be sufficiently controlled by GHPs.

Q1: Can the hazards be controlled at this step by GHP's?

Comment

Q1 can lead to mistakes. The GHP part of the GPFH includes some control measures that within the HACCP approach are typically identified as implemented at CCP's. Examples are metal detection (paragraph 7.5.2.), cleaning to prevent cross contamination with allergens (para. 7.2.7) and time and temperature control (para 7.2.1). Q1 will lead food business to statements like “our pasteurisation is not a CCP because it is in our GHP's”. We don't support this.

Proposed change

Add the following to the already existing note to question 1 in the decision tree:

Important notice:

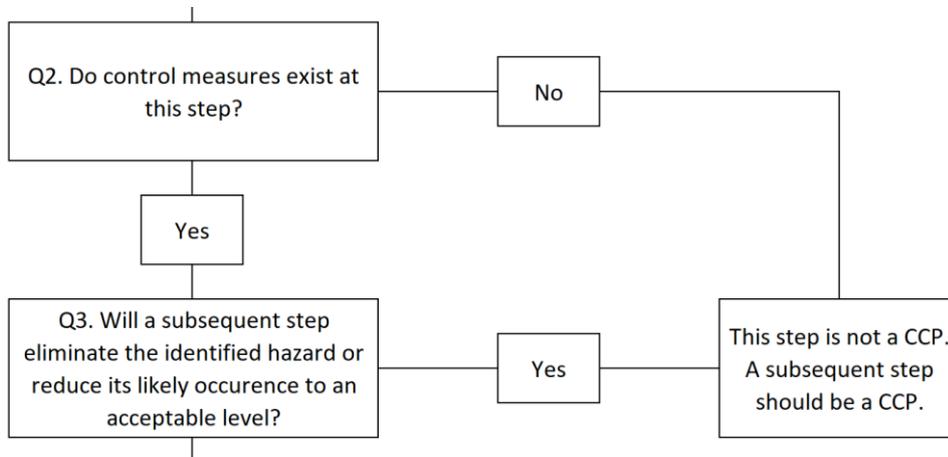
* Consider the significance of the hazard (the likelihood in absence of control measures and the severity of the hazard) and whether it could be controlled by GHPs.

All GHPs are important but some GHPs have a greater impact on food safety. Thus, for some GHPs greater attention may be needed to provide safe food. In cases in which FBOs need or choose to apply HACCP, the GHPs that require greater attention shall be considered to be control measures and, according to the principles of HACCP, be substantiated by hazard analysis and, as appropriate, be subject to monitoring and corrective actions.

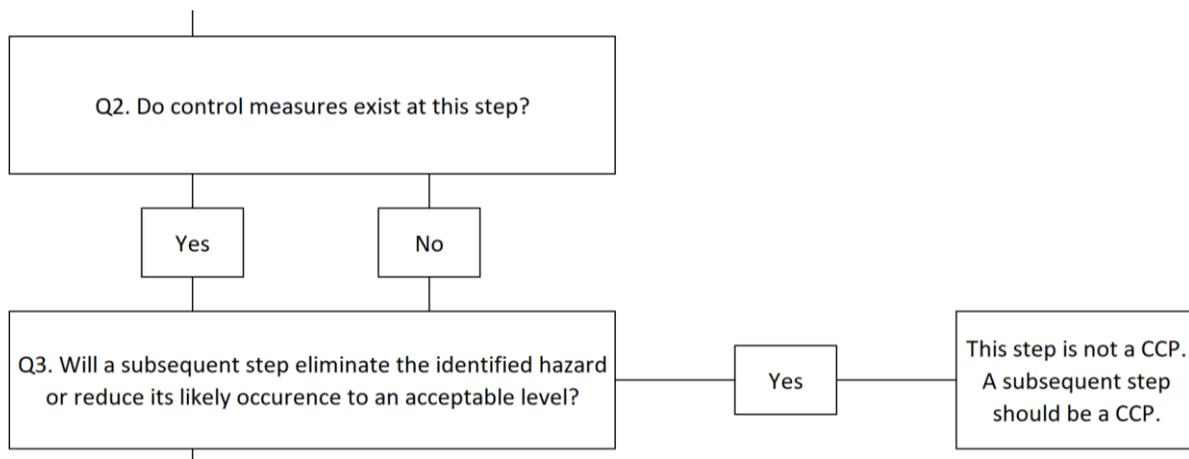
Q2. Do control measures exist at this step?

Comment

A “No” at Q2 leads to the same answer as a “yes” to Q3. So, the decision tree can also be written as:



In terms of the outcome, the decision tree can also be written as



Proposed change

Delete Q2 - There is no added value.

Q2. Do control measures exist at this step?

and

Q4. Can this step prevent, reduce or eliminate the hazard to an acceptable level? **

Comment

When Q2 is answered with “yes”, Q4 can never be answered with “no”.

Proposed change

Delete Q2 - Will lead to conflict Q4.

Q3. Will a subsequent step eliminate the identified hazard or reduce **its likely occurrence** to an acceptable level?

Comment

The phrase “its likely occurrence” is causing confusion. Many people read it as “reducing its likelihood of occurrence” which is very different from “its likely occurrence”.

Next to this, Q3 is referring a control measure that is defined as “Any action or activity that can be used to prevent or eliminate a hazard or reduce it to an acceptable level.” The phrase “its likely occurrence” is not included in this definition of a control measure and therefore it should be included in Q3.

Proposed change

Rewrite Q3 as:

Q3. Will a control measure at a subsequent step eliminate the identified hazard or reduce it to an acceptable level?

Q3. The answer “yes” leads to the conclusion “This step is not a CCP. A subsequent step should be a CCP”.

Comment

This answer may cause FBOs to think that when at a subsequent step there is a control measure to eliminate or reduce the hazard, there is nothing they have to do at the current step.

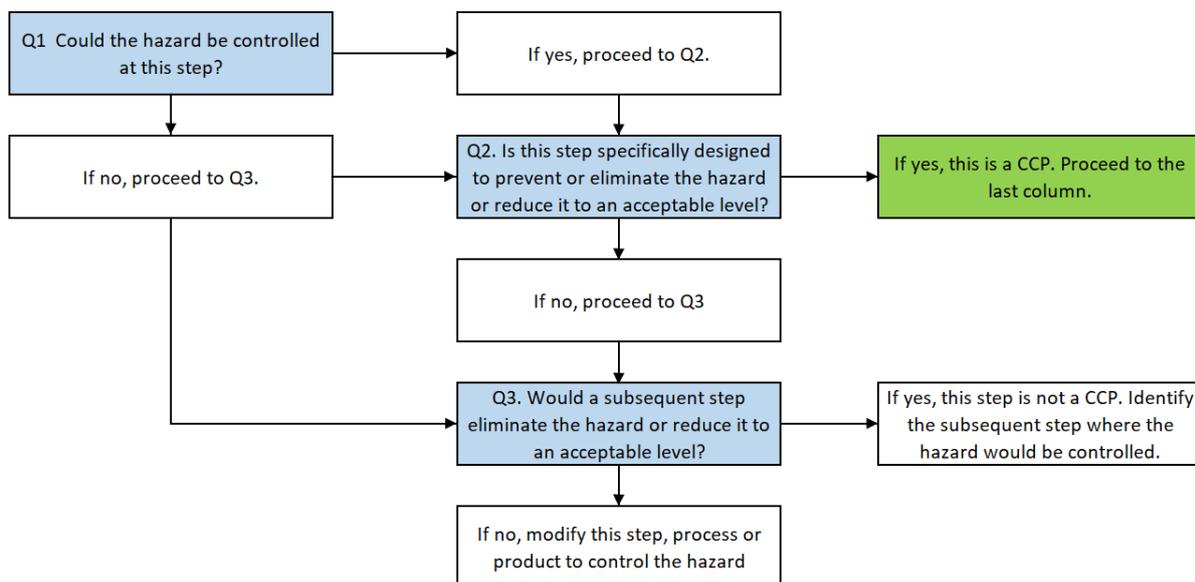
Proposed change

Rewrite the yes-answer to Q3 as:

“This step is not a CCP. A subsequent step should be a CCP. At the current step apply prerequisite programmes or GHPs as appropriate.”

Annex 2 - Worksheet

A decision tree designed according to the worksheet looks like this:

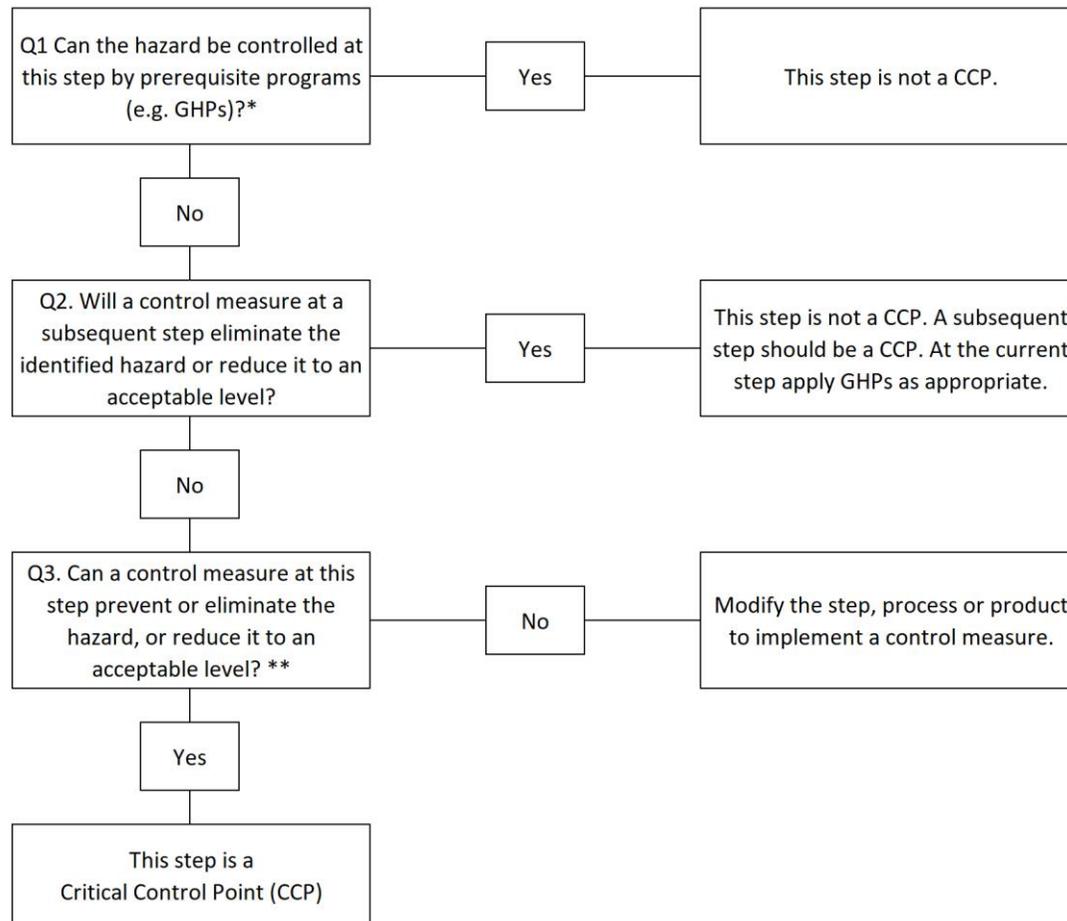


According to the decision making process in the worksheet, CCPs are only identified when the step is **specifically designed** to prevent or eliminate the hazard it to an acceptable level. Thus the worksheet forces FBOs to implement control measures that are **specifically designed** to prevent, eliminate or reduce hazard. Control measures like cooking, cooling or sieves can be designed to control the quality of the product and have the control of food safety as a kind of by-effect. Why should FBOs need to add control measures that are **specifically designed** to control food safety when the job is already done by control measures that are **not specifically designed** to control food safety? We do not support this.

Proposed change

Design a worksheet that is consistent with the final decision tree.

Summary. Based on the preceding comments, the decision tree to identify CCPs shall like the one here below. A HACCP worksheet shall be designed accordingly.



* Consider the significance of the hazard (the severity of the hazard and the likelihood of its occurrence in absence or deviation of control measures) and whether it is controlled by GHPs. However, some GHPs have greater impact on food safety than others. For these GHPs greater attention may be needed to provide safe food. In cases FBOs need or choose to apply HACCP, the GHPs that require greater attention shall be regarded as control measures and, according to the principles of HACCP, be substantiated by hazard analysis and, as appropriate, be subject to monitoring and corrective actions.

** 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.