

European Union comments
CODEX COMMITTEE ON FOOD HYGIENE
Forty-eighth Session
Los Angeles, California, United States of America,
7-11 November 2016
Agenda Item 4: Draft Revision of the General Principles of Food
Hygiene (CAC/RCP 1-1969) (CX/FH 16/48/5)

Mixed Competence
European Union Vote

General comments

The European Union and its Member States (EUMS) would like to thank and congratulate France as chair and Chile, Ghana, India and United States of America as co-chairs of the EWG for the approach taken and the very useful preparatory work in view of a possible revision of CAC/RCP 1-1969.

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.