

CODEX COMMITTEE ON FOOD HYGIENE
(Fifty-fourth Session)
Nairobi, Kenya
11 – 15 March December 2024

European Union Comments on

Agenda item 9:

**ALIGNEMENT OF CODEX TEXTS DEVELOPED BY CCFH WITH THE
REVISED *GENERAL PRINCIPLES OF FOOD HYGIENE* (CXC 1-1969)
(Prepared by the United Kingdom)**

CX/FH 24/54/10
(Reply to CL 2024/12-FH)

Mixed Competence
European Union Vote

The European Union and its Member States (EUMS) would like to thank and congratulate the United Kingdom with the proposed alignment of Codex texts with the revised *General Principles of Food Hygiene*. The EUMS would like to make the following comments.

As indicated by the United Kingdom, the EUMS consider that a full alignment is not intuitive and may require substantial resources from the Codex members. In addition, texts are regularly completely revised and such revision may be used to provide a full structural and technical alignment with CXC 1-1969. The EUMS therefore:

- agree to prioritize, divide and integrate the work into the future work plan;
- support the creation of a standing working group;
- prefer Option 1 at this stage (a simple alignment). Rationale: 'In the absence of metrics on usage, considerable time could be used updating little used texts following an Option 2 or 3 approach and this would detract from the capacity of CCFH to progress work more important to the protection of public health. The EUMS don't feel it is appropriate to add new text into these documents during an alignment exercise unless the documents were fully revised following the full CCFH procedure based on priority. If there are concerns about differing definitions, then a general text could be added that flags the presence of a new definition in the General Principles of Hygiene text and notes that it supersedes the original definition.

In case CCFH54 decides to proceed with option 2, the following replies are provided to the questions in Appendix C:

- As a general comment, the EUMS would like to indicate that they appreciate the inclusion of an example by the United Kingdom, but the example of *Vibrio in Seafood* might be the best example since a full revision is ongoing; the answers provided below should be considered for future management of texts, not under revision, while for *Vibrio in Seafood*, a full structural and technical revision should be considered;
- Q1: option a) is preferred;
- Q2: a simple cross reference is considered sufficient;
- Q3: “Objectives” might be useful to introduce a section; a “Rationale” is normally not introduced systematically for control measures, being available in the scientific basis of the control measures (e.g. JEMRA reports);
- Q4: in this option, the content of paragraphs should not be amended or deleted even if repetitions are detected as this might trigger discussions on the content;
- Q5: in each section (11 and 12) there should be a cross-reference, similar to the double cross-reference in the current guidelines;
- Q6: Yes there should be a cross-reference to CXG 100-2023. There is no need for other cross-references or recommendations in this Section on water. Cross-references to agreed CCFH texts avoid opening discussion on content and is therefore prudent.

In case CCFH54 decides to proceed with option 3, the following replies are provided to the questions in Appendix D:

- Q7: sub-headings should only be required if there are specific recommendations in guidelines related to the subtitle.
- Q8: a pure alignment process should not replace text even when outdated;
- Q9: as indicated, a full alignment should only be considered with a full revision of the text; option 2 is therefore preferred;
- Q10: the normal criteria for the revision of texts should be considered; texts with a low priority for revision, should nevertheless be considered for revision after a number of years when the bulk of other revisions are finalised and at that stage CCFH may decide on a full revision (including content) or an option 3 revision.