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**European Union comments**  
**CODEX COMMITTEE ON FOOD HYGIENE**  
**Fiftieth Session**

**Panama City, Panama**

**12-16 November 2018**

**Agenda Item 5: Proposed Draft Revision of the General Principles of Food Hygiene (CAC/RCP 1-1969) and its HACCP Annex (CX/FH 18/50/5)**

*Mixed Competence*  
*European Union Vote*

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

## **1. Recommendations of the EWG**

### Answer to Q1

The EUMS do not see much added value in the Table in the text and therefore suggest moving it to an annex and addressing the specific comments below.

### Answer to Q2

FAO/WHO to address in the first place. Although they relate to animal feed, it would be useful to reference the following documents:

- FAO and IFIF 2010 Good practices for the feed industry – Implementing the Codex Alimentarius Code of Practice on Good Animal Feeding
- FAO Animal Production and Health Manual No. 9. Rome.

### Answer to Q3

The EUMS agree with the move to the section on water to keep all recommendations together. If water supply must be addressed between paragraph 37 and 38, a cross-reference to the water section could be inserted.

### Answer to Q4

The EUMS consider a paragraph on the monitoring of temperature of premises, equipment and food very relevant in the General Principles and a significant help for small FBOs. It might also provide the opportunity to better explain GHP requiring higher control (e.g. by examples). Although the 3rd and 4th lines of paragraph 43 address this issue, a further paragraph may provide additional clarity which some readers may find helpful to include the need to verify the accuracy/tolerance of monitoring equipment and an indication of what an acceptable tolerance for monitoring equipment is.

### Paragraph 75 on potable water

The term 'potable water' is well understood and could be used in the absence of a revised definition, however it might be useful to add 'potable water' to the list of definitions.

### Answer to Q5

'Cleanliness' is more acceptable and meaningful than Sanitation. On a Global Food Safety Initiative Technical Working Groups (GFSI TWG) for food surfaces it was decided that cleaning relates to removal of soil and sanitising is reducing microbiological contamination or allergens to acceptable levels. 'Cleanliness' would need to be defined (clean and, where appropriate, disinfected) and referenced in the Objectives box 'Cleanliness' could also then be used within the table comparing GHPs and the HACCP Controls. Alternative option is "cleaning and disinfection".

### Answer to Q6

The EUMS are of the opinion that this suggestion works, and is necessary, in both places. Whilst a change to the wording of a principle is a substantial change, the suggested change to Principle 3 as [Determine and validate critical limit(s)] is a good idea since this is a key area requiring validation. Nevertheless, validation goes further than solely critical limits, e.g. validation of the suitability of monitoring procedures, validation of the overall suitability of the HACCP plan. Therefore, the inclusion in the guidelines at paragraphs 170 and 171 and with the new heading is also important..

### Answer to Q7

A decision tree is considered very useful to explain the link between GHPs, GHPs requiring higher controls and CCPs. The details need to be further discussed and its use must be clearly indicated as optional for the FBO.

### Answer to Q8

This new title and amendments are helpful. The text could be extended slightly with further examples of validation needed, e.g. validation of the suitability of monitoring procedures to detect loss of control and the capability of corrective action procedures to both bring the CCP back under control and deal with potentially unsafe food that has been produced during a deviation period.

### Position on "enhanced GHPs"

The EUMS support the recommendation of the EWG not to include the wording "enhanced GHPs", which is already addressed in the revised draft. Nevertheless, the needs for GHPs with higher control are hardly elaborated in the guidance. A section on monitoring of temperature could be used to provide examples what is meant by it.

## **2. General comments**

### Review of hazards

We note CX/FH 18/50/5 now provides for a definition of the term “review of hazards” (yet no proposed wording) which is mentioned under GHPs in the Comparison of GHP and HACCP Controls Table on page 5. This term has the potential to undermine and devalue the more usual and understood term “hazard analysis” and for this reason we have voiced our opposition in the past.

The hazard analysis, which can be carried out in a simplified way, is mandatory for all food business operators (perhaps with the exception of primary producers). Any deviation from that would contradict EU requirements and is considered as unacceptable in this draft guidance. Rather than inventing new confusing terminology (review of hazards), the draft should explain how the hazard analysis can be facilitated for certain establishments.

### Consistency of terminology

The EUMS repeat its regret that this revision was not used to enhance consistency with terminology used in ISO 22000 and existing Codex Alimentarius documents. Even if different guidance documents might be considered for different purposes, the topics are the same and consistent terminology might have simplified the understanding of the guides and therefore facilitated their application. In particular, the terminology includes:

- GHPs as used in the text, proposed alternative: codes of hygienic practice or prerequisite programs;
- Food Hygiene System, proposed alternatives: food safety management systems or food safety control system;
- ...

### Link between GHPs, GHPs with higher control and HACCP-based procedures

The EUMS consider that one of the key objectives of the revision (clarify the relationship between GHPs and HACCP), has not been properly addressed. Several paragraphs indicate

such link, repeating or contradicting each other, e.g. paragraphs 6, 15(ii) and (v), 19, 25, 136, 139, 157 and the annexed flowchart/decision tree. Since this link connects the 2 Chapter, it should be elaboration before Chapter 1 on GHPs. The decision tree to conclude if GHPs are sufficient, whether GHPs with higher control, or CCP are required, could be connected to such section. The central role of the hazard analysis in such decision should be highlighted. Finally, more guidance should be provided on parameters (probability, severity, ...) how to decide whether GHPs are sufficient, when GHPs requiring higher controls are needed, or when CCP are essential. This could be based and make reference to the FAO/WHO document on 'Risk characterisation of microbiological hazards in food'<sup>1</sup> and 'Quality management systems in the food industry'<sup>2</sup> (see also specific comment on paragraph 154).

### Structure

The EUMS support the agreed structure being a general part and 2 Chapters (GHPs and HACCP system). However:

- A contribution on "Primary Production" is hanging somewhere in the first Chapter before a Section 1. The contribution on primary production which provides (necessary) simplified approaches of GHPs (so in fact GAPs) is highly appreciated, but it is very unclear which GHPs are still considered relevant in the Sections 1 to 7 of the rest of the Chapter 1 in which primary production is sometimes referred to.
- The structure within Sections in the Chapter 1 is confusing and no consistent approach seems to be having taken.

## 3. Specific comments

### Paragraphs 16-17

We repeat our comment made at CCFH49 to replace the 2 paragraphs on management commitment by paragraphs on food safety culture that could read as follows:

### "Food Safety Culture

**16. Fundamental to the successful functioning of any food hygiene system is the establishment and maintenance of an appropriate food safety culture acknowledging the importance of human behaviour of all individuals in a business in providing safe and wholesome foods. Following elements are important in cultivating a positive food safety culture:**

- **Commitment of the management and all employees to the safe production of food**

<sup>1</sup> <http://www.fao.org/docrep/012/i1134e/i1134e00.htm> , in particular the Chapter on Semi-quantitative risk characterisation might be relevant.

<sup>2</sup> ISBN 987-90-5989-275-0

- **Leadership to set the right direction and to engage all employees in food safety practices**
- **Risk awareness of the importance of food safety and hygiene by all employees in the business**
- **Open and clear communication between all employees in the business, including communication of deviations and expectations**
- **The availability of sufficient resources to ensure the safe and hygienic handling of food.**

**17. Management commitment should result in the continual improvement of—the effectiveness of the food hygiene systems in place by:**

- **ensuring that roles and responsibilities are clearly communicated in the food business;**
- **maintaining the integrity of the food hygiene system when changes are planned and implemented;**
- **verifying that controls are working and documentation is up to date;**
- **ensuring the appropriate training and supervision are in place for personnel;**
- **ensuring compliance with relevant regulatory requirements."**

*Rationale:* Management commitment is only part of a food safety culture, which is a broader concept that is relatively new and therefore needs to be better described.

Other specific comments will be provided during the Working Group meeting on Sunday.

