

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda item 9

CX/FH 24/54/10 Add.1  
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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

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### ALIGNMENT OF CODEX TEXTS DEVELOPED BY CCFH WITH THE REVISED GENERAL PRINCIPLES OF FOOD HYGIENE (CXC 1-1969)

Comments in reply to CL 2024/12/FH

*Comments of Argentina, Australia, Canada, Colombia, Ecuador, European Union, Iraq, Japan, Kenya, Malaysia, New Zealand, Peru, Russian Federation, Saudi Arabia, United Arab Emirates, Uruguay, USA and ICUMSA*

#### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/12/FH issued in January 2024. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

#### Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

**GENERAL COMMENTS**

<b>COMMENT</b>	<b>MEMBER / OBSERVER</b>
Australia supports the recommendations of the paper, that this alignment work is prioritised, divided and integrated into the future work plan; and that a standing working group be established to consider how alignment, priority setting, and integrating this into the work plan can be done. We would support further consideration of a hybrid and flexible approach.	<b>Australia</b>
Under section 4. Recommendations: 4.1 - i. The work is prioritized, divided, and integrated into the future work plan General comment: Full structural alignment is prioritized for all texts that need it. Documents being revised or drafted should follow structural and technical alignment. Work is undertaken to technically align text that are not being revised on a priority basis.	<b>Canada</b>
Kenya notes that the discussion paper is in good faith and it gives guidance on the alignment of codex texts, and uniformity of structure, and facilitates cross-referencing where necessary.	<b>Kenya</b>

**SPECIFIC COMMENTS**

<b>OPTION 1, OPTION 2, OPTION 3</b>	
<p>General comment:</p> <p>Option 1 does not seem sufficient.</p> <p>Option 2 would allow structural alignment and can be achieved in a reasonable time.</p> <p>Option 3 would require considerable time investment. Technical alignment of the texts can be prioritized according to agreed criteria.</p>	<b>Canada</b>
<p>Opción 3 – Armonización estructural y técnica completa con CXC 1-1969 Es la más adecuada para utilizar.</p>	<b>Colombia</b>
<p>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:</p> <ul style="list-style-type: none"> <li>- agree to prioritize, divide and integrate the work into the future work plan;</li> <li>- support the creation of a standing working group;</li> <li>- 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,</li> </ul>	<b>European Union</b>

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.	
Prefer option 1, considering the workload. Further alignment should be considered, when the revision of the existing document is taken up for new work.	<b>Japan</b>
Kenya takes note of the three options: option 1 is simple and offers drafters room to tailor the subheadings to the specific area of focus, however, this flexibility may pose a challenge in text alignment; Option 2 gives clear elaboration of the texts structurally, similar to Option 3; and, Option 3, in addition also offers both technical and structural alignment. However, some of the guidelines may have unique structures and can be exempted from the three options. Therefore, Kenya proposes the implementation of Option 3 for alignment of all current and future CCFH texts where applicable.	<b>Kenya</b>
The current standards need to be updated accordingly with the revised CXC 1-1969. Malaysia prefers Option 2 on full structural alignment as most of current standards are already formatted with cross alignment text to CXC 1-1969.	<b>Malaysia</b>
Perú considera la revisión con enfoque más metódico que, asegure una armonización plena (estructura y contenido), lo que involucra la OPCIÓN 3	<b>Peru</b>
The Russian Federation would choose Option 2.	<b>Russian Federation</b>
Uruguay considera que existen diferentes situaciones:  1) En los documentos ya existentes a los que no se les realizará una próxima revisión, se sugiere al menos hacer referencia a los principios generales en la versión actual CXC1-1969 Rev 2022  2) Para los documentos que actualmente se están revisando, Uruguay considera que debería realizarse una armonización estructural y técnica completa ( opción3)	<b>Uruguay</b>
The United States supports new work to align Codex texts developed by the Codex Committee on Food Hygiene (CCFH) with the revised General Principles of Food Hygiene (CXC 1-1969) and that such new work be prioritized, divided, and integrated into the future work plan. As Chair of the Electronic Working Group (EWG) on New Work /Forward Work Plan, the United States further would support the creation of a standing working group to help consider how the alignment of existing texts should be prioritized, how work can be divided, and to update the future work plan.  The United States is still considering the questions and the three options for alignment presented in the discussion paper. Of the presented options, the United States would likely support Option 3 (Full structural and technical alignment with CXC 1-1969) understanding that this option requires the most effort and would extend the overall timeline to complete alignment of all Codex texts developed by CCFH with CXC 1-1969. The United States believes that Option 3 would provide the most consistency among Codex texts and avoid confusion with terminology and application of Codex principles when working across Codex texts. The United States tentatively supports structural alignment at the main heading level and is still considering the necessity of subheading structural alignment.	<b>USA</b>
<b>Appendix B – Heading Options</b>	

Agree	Iraq
<b>Appendix C – Example of Full Structural Alignment (Annexes to CXG 73-2010 are not included in this example)</b>	
In case CCFH54 decides to proceed with option 2, the following replies are provided to the questions in Appendix C: o 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;	European Union
<b>QUESTION 1</b>	
Argentina prefers option A	Argentina
Australia consider option a) as the preferred option for this initial alignment work.	Australia
Option a is preferred and seems more appropriate for existing text. The text in the General Principles of Food Hygiene (CXC 1-1969) is likely applicable and sufficient for the existing CCFH documents that follow the structure of the GPFH. It would be more appropriate to add new wording specific to the text being aligned, as necessary, during the revision of those documents instead of during the alignment exercise.	Canada
En primera instancia se puede realizar una simple referencia cruzada a los Principios generales de higiene de los alimentos (CXC 1-1969) para mantener la armonización de los títulos, siempre y cuando el texto aplique, de lo contrario, se debe modificar el texto con una redacción específica para el documento que se está armonizando.	Colombia
Ecuador considera que la mejor opción sería la b) para tener mayor claridad al momento de leer el documento.	Ecuador
The EUMS prefer option a)	European Union
Japan prefers option a). However, just adding headings to align the structure with the GPFH may not be necessary depending on the nature of the existing document, and it is not adding any value. Chapeau sentence like “Some sections in the GPFH may also be helpful, and it is advised to read this document in conjunction with the GPFH.”	Japan
Comment. Kenya proposes the adoption of option (a). Justification: It will reduce bulkiness and confusion. It's also in alignment with other codex texts.	Kenya
Question 1 - Prefer Option (b). Do it once, do it well.	New Zealand
Respecto a la pregunta 1. Perú considera pertinente se considere la opción a), por ser lineamientos generales para mantener la inocuidad de los alimentos; responsabilidades, entre otros que son de interés para los OEA	Peru
For Russian Federation Option a) is more preferable	Russian Federation
Saudi Arabia deems option (a) to be more appropriate.	Saudi Arabia
Option "a" is more appropriate but we have to add "In addition for more detiles base on the nature of text object"	United Arab Emirates
Uruguay considera que esta opción a) sería la más adecuada, sin embargo, en el caso de requerirlo se podría agregar nueva redacción específica según se considere.	Uruguay

Question 1- The United States believes that a simple cross-reference would be sufficient.	<b>USA</b>
Option a	<b>ICUMSA</b>
<b>QUESTION 2</b>	
Argentina suggests new wording specific to the text being aligned is created	<b>Argentina</b>
If it is considered necessary to provide more detail than what is given in CXC 1-1969, then this should be identified and wording drafted as part of this process. The guiding principle remains that the purpose of this activity is alignment of texts, creating consistency across the texts and not altering the standards themselves.	<b>Australia</b>
Agree that a reference to Section 7 of CXC 1-1969 is appropriate as a first step. Additional information can be added (as necessary) once the text is undergoing technical review.	<b>Canada</b>
Colocar la referencia cruzada a la Sección 7 de CXC 1-1969 y dependiendo del tipo de documento que se esté armonizando adicionar información de los puntos que se consideren pertinentes y específicos del mismo.	<b>Colombia</b>
Ecuador considera que por la importancia de esta sección no sería adecuado incorporar una referencia cruzada a la Sección 7 de CXC 1-1969, sino una redacción específica para el texto que se está armonizando.	<b>Ecuador</b>
The EUMS consider that a simple cross reference is sufficient.	<b>European Union</b>
Yes, Japan believes that simple cross-reference would be sufficient	<b>Japan</b>
Comment: Kenya proposes that a text that will be in line with section 7 be developed, rather than simply cross-referencing to CXC 1- 1969 Justification: While developing the guideline, some products may have unique requirements in their application, and thus further guidance is required, whereas CXC 1- 1969 is general.	<b>Kenya</b>
Cross reference is fine. Provided they are hyperlinked for easy access. Minimise duplication and only include additional requirements that are not in CXC 1-1969.	<b>New Zealand</b>
Respecto a la pregunta 2. Perú considera que no debe considerarse una simple referencia cruzada a la Sección 7 de CXC 1-1969, sino incorpore una nueva redacción específica para cada Directriz	<b>Peru</b>
Russian Federation believes that the inclusion of reference is enough.	<b>Russian Federation</b>
Saudi Arabia suggest the following: it is appropriate to include CXC 1-1969 as a cross reference to Section 7.	<b>Saudi Arabia</b>
Yes	<b>United Arab Emirates</b>
Uruguay considera que una simple referencia no es suficiente en este punto tan importante	<b>Uruguay</b>
If the Committee chooses Option 3 (full structural and technical alignment with CXC 1-1969), then the alignment work could consider discussion of Good Hygiene Practices (GHPs) that may require greater attention, and support additional text as appropriate. If the Committee chooses Options 1 or 2 (Simple alignment and Full structural alignment, respectively), then such considerations and potential added text would be out of scope.	<b>USA</b>
Yes	<b>ICUMSA</b>

<b>QUESTION 3</b>	
Argentina suggests a simple cross-reference	<b>Argentina</b>
To minimise repetition and avoid issues with maintaining text across multiple documents should CXC 1-1969 be amended further, a simple cross-reference is considered sufficient and to future proof against additional work.	<b>Australia</b>
A cross-reference is sufficient and the preferred option, this would allow alignment with CXC 1-1969. Elaboration of new text would become a revision of the text and this is not the goal at this time.	<b>Canada</b>
Donde corresponda sería suficiente con una simple referencia cruzada, sin embargo, podría existir la necesidad de justificar alguna sesión de manera específica según naturaleza del documento  Elaborar textos con los “Objetivos” y la “Justificación” de cada sección, como en CXC 1-1969.	<b>Colombia</b>
Ecuador considera que debe estar redactada los textos con los “Objetivos” y la “Justificación” de cada sección.	<b>Ecuador</b>
“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);	<b>European Union</b>
Japan believes that simple cross-reference would be sufficient	<b>Japan</b>
Comment: A simple reference to section 8 is sufficient. Justification: Elaboration in this section is adequate.	<b>Kenya</b>
Question 3 - As above. Simple cross ref.	<b>New Zealand</b>
-Perú considera que para el caso bastaría una simple referencia cruzada	<b>Peru</b>
The Russian Federation believes that the simple cross reference is enough	<b>Russian Federation</b>
Saudi Arabia suggest that a single cross reference is sufficient.	<b>Saudi Arabia</b>
It's good to elaborate “Objectives” and “Rationale	<b>United Arab Emirates</b>
Uruguay entiende en general que es suficiente una simple referencia. Sin embargo cuando se considere puede requerir elaborar el texto con los objetivos y la justificación de cada sección.	<b>Uruguay</b>
The United States believes that a simple cross-reference would be sufficient.	<b>USA</b>
Wording should be “Is it necessary” not “It is necessary” to make the sentence into a question. In answer to the question, a simple cross-reference should be sufficient.	<b>ICUMSA</b>
<b>QUESTION 4</b>	
Argentina agrees with a full review	<b>Argentina</b>
The alignment work should focus on making the changes for alignment, not changing the standards themselves. Reviewing existing text will potentially delay this work and prevent completion for many years. Australia’s preference is to focus on the alignment, and it is not necessary to	<b>Australia</b>

review existing text. A review of text could be done as part of a separate technical review and update of the specific text. We further note in the example given, the reference to V. cholerae is an important point in the Vibrio guidelines that would be unique to these guidelines.	
If the document is currently being revised by an electronic working group, than the review of the text can be done at the same time and modified as necessary. However, for text that are not currently under revision, this is not the preferred option.	<b>Canada</b>
Sí es necesario revisar los párrafos del texto para determinar si la información que figura en ellos beneficia al texto, los cuales se podría incluir como casos y ejemplos aplicados al documento, además de colocar la referencia cruzada de CXC 1-1969.	<b>Colombia</b>
Ecuador considera que como parte del trabajo de armonización si es necesario revisar los párrafos del texto además de la referencia a CXC 1-1969 para contar con un documento completo y preciso.	<b>Ecuador</b>
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.	<b>European Union</b>
No. Japan believes that level of details should be considered when we revise each specific text, not as part of alignment work. Further alignment should be considered when the revision of the existing document is taken up for new work.	<b>Japan</b>
Comment: Kenya proposes the adoption of a simple reference to CXC 1 1969. Justification: The text in CXC 1 1969 is adequate to take care of other illnesses that could be as a result of other biological hazards.	<b>Kenya</b>
Yes beneficial to review the text.	<b>New Zealand</b>
Respecto a la pregunta 4. Perú considera se evalúe si la información que figura en ellos beneficia al texto, además de la referencia a CXC 1-1969. Tómese en cuenta que cada Directriz específica debe establecer o mencionar los riesgos específicos de cada actividad productiva considerando su finalidad como Directriz.	<b>Peru</b>
To our mind, such work is necessary	<b>Russian Federation</b>
Saudi Arabia recommends reviewing the paragraphs of text to determine if the information is beneficial to the text.	<b>Saudi Arabia</b>
We agreed with same wording in paragraph 41 to start with the reference to CXC 1- 1969 then to give the explanation based on the object topic.	<b>United Arab Emirates</b>
Uruguay considera que es necesario revisar los párrafos del texto y determinar si la información que figura en ellos beneficia al texto, además de la referencia a CXC 1-1969 Rev 2022	<b>Uruguay</b>
The United States believes that it is a necessary part of alignment to review paragraphs of texts and determine whether the information included, in addition to the reference of CXC 1-1969, is beneficial to the text. The United States believes this to fall under Option 3 above (full structural and technical alignment with CXC 1-1969). If the Committee chooses Options 1 or 2 (Simple alignment and Full structural alignment, respectively), then this level of review would be out of scope.	<b>USA</b>
Yes, the review should be done to determine if further information needs to be added.	<b>ICUMSA</b>
<b>QUESTION 5</b>	
We suggest a single cross reference to main section	<b>Argentina</b>

A single reference would remove the duplication that is caused by separately inserting the same cross reference for each element - it could also make scanning the document for any additional information to what is in CXC 1-1969 quicker.	<b>Australia</b>
A single cross-reference to the main section is sufficient. Listing all the sub-heading when there is no specific information related to those headings is unnecessary. It seems that more recent CCFH documents have moved away from listing all headings from the GPFH when there is no specific information to be included and this seems appropriate since the USE section of each document already mention that the document should be used in conjunction with the GPFH and other Codes of Practice.	<b>Canada</b>
Es necesario enumerar cada subtítulo de las secciones y realizar referencia cruzada específica en cada caso.	<b>Colombia</b>
Ecuador considera que como parte del trabajo de armonización se debe enumerar cada subtítulo de dichas secciones con la finalidad de que lectores encuentren los puntos clave del documento.	<b>Ecuador</b>
In each section (11 and 12) there should be a cross-reference, similar to the double cross-reference in the current guidelines.	<b>European Union</b>
Single cross reference would be sufficient.	<b>Japan</b>
Comment: Kenya proposes the adoption of the alignment work to list out each sub-heading in such sections and provide a specific cross-reference to CXC 1-1969 in each case rather than the single cross-reference to the main section is sufficient. Justification: It gives a better guide to the user.	<b>Kenya</b>
Question 5 - A single cross reference is sufficient unless there is additional text for a subhead. Then include that subheading only.	<b>New Zealand</b>
Respecto a la pregunta 5. Perú considera enumerar cada subtítulo de dichas secciones y realizar una referencia cruzada específica a CXC 1-1969 en cada caso	<b>Peru</b>
The Russian Federation believes cross reference is sufficient	<b>Russian Federation</b>
Saudi Arabia recommends to cross reference CXC 1-1969 in each sub-headings (section VI and Section VII).	<b>Saudi Arabia</b>
Uruguay entiende que sería necesario referenciarlo en cada sección (título) y no es necesario en cada subtítulo	<b>Uruguay</b>
The United States believes that if there is no additional information for any sub-headings underneath a main heading, then a simple reference to CXC 1-1969 under the main heading should suffice. For clarity, additional text could be provided in such as case, for example "For this section, including all sub-sections, refer to Section X.X of the General Principles of Food Hygiene (CXC 1-1969). This approach would promote readability of Codex texts and avoid excessive and repetitive cross-references.	<b>USA</b>
No, a single cross reference should be sufficient.	<b>ICUMSA</b>
<b>QUESTION 6</b>	
Argentina doesn't agree	<b>Argentina</b>
Could a reference to CXG100-2023 be made in the early part of the texts, such as in the 'Use' titled section 4, (paragraph 25 in the Vibrio text example) to alert the reader to this guidance on water use and reuse. Then no need to make further references to it throughout the document text.	<b>Australia</b>
Yes, potentially. For the Vibrio electronic working group to assess.	<b>Canada</b>
Se debe colocar la referencia cruzada del documento "Directrices para el uso y la reutilización inocuos del agua en la producción y elaboración de alimentos (CXG 100-2023)".	<b>Colombia</b>



Ecuador considera que también es necesario realizar la armonización con las Directrices para el uso y la reutilización inocuos del agua en la producción y elaboración de alimentos.	<b>Ecuador</b>
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.	<b>European Union</b>
Instead of aligning to all the documents developed, it is preferred to have a simple reference.	<b>Japan</b>
Comment: Kenya proposes that it is necessary to ensure alignment with the Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (CXG 100-2023) which was adopted at the 46th session of the Codex Alimentarius Commission Justification: The new guideline is well structured and has adequate information.	<b>Kenya</b>
Any cross refs should be aligned.	<b>New Zealand</b>
Respecto a la pregunta 6. Perú considera que si es necesario la armonización de las Directriz CXG 100-2023 con CXC 1-1969, toda vez que los temas que se tocan en la directriz son diferentes y no tienen relación entre si:  Anexo I productos frescos Anexo II: Pescado y productos pesqueros Anexo III: Producción de leche y productos lácteos Anexo IV: Tecnologías de recuperación y tratamiento del agua para su reutilización	<b>Peru</b>
We believe it is necessary	<b>Russian Federation</b>
Yes, it is.	<b>Saudi Arabia</b>
It could be use as sub-reference for more appropriate option	<b>United Arab Emirates</b>
Uruguay considera que se debería realizar la armonización con las Directrices para el uso y la reutilización inocuos del agua en la producción y elaboración de alimentos (CXG 100-2023)	<b>Uruguay</b>
The United States believes that alignment with CXG 100-2023 would ensure consistency of definitions regarding water and this level of alignment would be supported if the Committee chooses Option 3 (Full structural and technical alignment with CXC 1-1969). If the Committee chooses Options 1 or 2 (Simple alignment and Full structural alignment, respectively), then this additional alignment with CXG 100-2023 would be out of scope.	<b>USA</b>
Yes, alignment to CXG 100-2023 should be part of the alignment work.	<b>ICUMSA</b>
<b>Appendix D -Skeleton Proposal for Option 3</b>	
<b>QUESTION 7</b>	
Argentina prefers option 2	<b>Argentina</b>
Option 2 would make it clear which elements of CXC 1-1969 have no additional considerations for the purposes of the document that is being cross referenced. There are gaps in this case, but only because no additional requirements/considerations were needed over and above those already in CXC 1-1969.	<b>Australia</b>

Option 2 seems more appropriate, given that many sub-headings are used in the documents that need to be aligned. Regarding the instances where detailed headings don't apply causing gaps in the text, a reference to CXC 1-1969 can be included.	<b>Canada</b>
La plantilla en blanco (Apéndice B) debería constar de títulos principales y subtítulos (opción 2).	<b>Colombia</b>
Ecuador considera que la mejor opción podría ser la opción 2 para poder tener claridad del contenido de cada título principal y para que los lectores encuentren los puntos clave del documento.	<b>Ecuador</b>
In case CCFH54 decides to proceed with option 3, the following replies are provided to the questions in Appendix D: Sub-headings should only be required if there are specific recommendations in guidelines related to the subtitle.	<b>European Union</b>
Japan prefers Option1, there should be some flexibility in the document, and depending on the nature of the document, the structure of the GPFS may not always be appropriate.	<b>Japan</b>
Comment: Kenya proposes the adoption of option 2. Justification: It provides better guidance.	<b>Kenya</b>
Option 2, with the ability to delete unused subheadings.	<b>New Zealand</b>
Respecto a la pregunta 7. Perú considera que debería constar con títulos principales y subtítulos, toda vez que de esa manera es más fácil poder ubicar el contenido en cada Directriz comparando con la CXC 1-1969	<b>Peru</b>
The Russian Federation prefers Option 2	<b>Russian Federation</b>
Option 2: main heading and sub-headings.	<b>Saudi Arabia</b>
we support this option because when we prioritize the accuracy and consistency coming above the quick and flexibility.	<b>United Arab Emirates</b>
Uruguay considera que la opción 2 es más clara y ordena los temas	<b>Uruguay</b>
The United States prefers main and sub-headings in agreement with our response to Question 5. If there is no specific information or additional information for any of the sub-headings under a main heading for a document under revision, then a simple reference to CXC 1-1969 under the main heading (as proposed in Question 5) should suffice.	<b>USA</b>
Option 2	<b>ICUMSA</b>
<b>QUESTION 8</b>	
Argentina prefers that the harmonization process should be simplified to only add references to the relevant section of CXC 1-1969.	<b>Argentina</b>
Australia supports a streamlined approach, to only include references to the relevant section of CXC 1-1969 unless there are additional details relevant to the specific text. This would make it clear what the additional details are for that text.	<b>Australia</b>
The preferred option is to include only references to relevant section of the CXC 1-1969 with additional details relevant to individual guidelines, where necessary.	<b>Canada</b>
Se lo debería simplificar para añadir únicamente referencias a la sección pertinente de CXC 1-1969, a menos que haya información adicional que sea pertinente para directrices específicas	<b>Colombia</b>

Ecuador considera que es necesario sustituir un texto por el texto actualizado de CXC 1-1969, adicionalmente se debería mencionar información para directrices específicas.	<b>Ecuador</b>
A pure alignment process should not replace text even when outdated.	<b>European Union</b>
Prefer only references to relevant sections	<b>Japan</b>
Comment: Kenya proposes that the alignment process should be streamlined to include only references relevant to the section of the CXC 1-1969 unless there are additional details relevant to individual guidelines. Justification: To align the text and avoid repetitions.	<b>Kenya</b>
Streamlined to include only references relevant to the section of the CXC 1-1969 and hyperlinked. The links are the key.	<b>New Zealand</b>
Respecto a la pregunta 8. Perú considera que se debería añadir únicamente referencias a la sección pertinente de CXC 1-1969, a menos que haya información adicional que sea pertinente para directrices específicas.	<b>Peru</b>
The Russian Federation believes the alignment process should be streamlined to include only references to relevant sections of the CXG 73-2010	<b>Russian Federation</b>
It should be streamlined.	<b>Saudi Arabia</b>
This is fine, unless there are additional details.	<b>United Arab Emirates</b>
Uruguay entiende que sería necesario hacer la referencia al CXC1-1969 Rev 2022 y cuando sea necesario incorporar información adicional	<b>Uruguay</b>
The United States believes that the alignment process should be streamlined to include only references to the relevant individual sections of CXC 1-1969 unless there are additional details relevant to the individual guidelines under revision.	<b>USA</b>
Streamline but include any additional relevant details.	<b>ICUMSA</b>
<b>QUESTION 9</b>	
Argentina prefers option 1	<b>Argentina</b>
Australia supports Option 2, where the existing EWG that is revising, or will revise according to the CCFH future work plan, will complete the alignment work as part of their work on the text. This would allow the alignment work to then focus on other texts that are not currently in the work plan.	<b>Australia</b>
Option 2 seems reasonable. It would assure that the technical revisions take into account wording from CXC 1-1969 and help eliminate duplication.	<b>Canada</b>
Opción 2 – El trabajo de armonización se realiza en el GTE existente El trabajo de armonización se llevaría a cabo como parte de la planificación de la revisión técnica en el GTE existente, y cualquier cambio necesario como resultado de la armonización se comunicaría junto con las revisiones técnicas.	<b>Colombia</b>

Ecuador considera que la mejor opción sería la 1, ya que el grupo actual conoce los temas desarrollados y podría realizar aportes más precisos que un nuevo grupo.	<b>Ecuador</b>
As indicated, a full alignment should only be considered with a full revision of the text; option 2 is therefore preferred.	<b>European Union</b>
It depends on CCFH's conclusions to the previous questions on how complex the alignment work be, but Japan prefers option 2	<b>Japan</b>
Comment: Kenya proposes the adoption of option 2. Justification: Since there is an already existing EWG, it will make the alignment of text easier.	<b>Kenya</b>
Option 1. Hopefully this would ensure the best consistency with CXC.	<b>New Zealand</b>
The Russian Federation prefers option 2	<b>Russian Federation</b>
Option 2: work on alignment within existing EWG	<b>Saudi Arabia</b>
Uruguay considera que la opción 2 es la más adecuada	<b>Uruguay</b>
For Codex texts that are being revised or are included in the CCFH forward work plan, the United States believes that alignment work would be undertaken as part of the technical revision planning within the existing EWG and any changes required as a result of alignment would be reported alongside technical revisions.	<b>USA</b>
Option 2	<b>ICUMSA</b>
<b>QUESTION 10</b>	
Argentina doesn't have a position on this matter, it considers that this point can be defined when the discussion progresses during the 54th CCFH meeting.	<b>Argentina</b>
Noting the staged/hybrid approach suggested above, priorities could be set based on members 'voting' for those texts they consider should be priority for alignment. If Option 1 (update all cross-references to GPFH) was done first, each text could be evaluated at that point and a decision made about the priority for further work and whether option 2 or 3 type work was required.	<b>Australia</b>
Most of the headings and sub-headings in the new GPFH document have similar titles compared to the previous version, but the numbers have changed because of the restructuring of the document. Therefore, perhaps a note could be added on the main page of each document to inform users of this change. This note could be added simultaneously on all documents and then the remaining alignment steps could be done afterwards. The approach could be to prioritize the guidelines that are most viewed and/or the age of the guidelines.	<b>Canada</b>
La prioridad se podría establecer de acuerdo con el nivel de riesgo para causar ETA, la gravedad de enfermedad que ocasionan y por criterio de antigüedad, pero también de la velocidad de generación de datos científicos alrededor de la temática en cuestión	<b>Colombia</b>
Ecuador considera que para establecer prioridades entre los textos que no forman parte del plan de trabajo futuro se podría seguir el criterio de la antigüedad.	<b>Ecuador</b>
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.	<b>European Union</b>
Japan believes that no new mechanism is necessary. For those that have not completed alignment, criterion for new work "inconsistency with existing codes" will be YES.	<b>Japan</b>

P2 Step 1 criteria Process by which the Codex Committee on Food Hygiene (CCFH) will undertake its work (fao.org)	
Comment: Kenya proposes the approach of prioritizing text to be based on age and current/ emerging issues of importance. Justification: This is a systematic approach that takes into account emerging and pressing issues.	<b>Kenya</b>
How much it is used/referred to followed by how out of alignment it is.	<b>New Zealand</b>
We believe that age of texts should be taken into account while prioritizing texts	<b>Russian Federation</b>
Saudi Arabia recommends that the age of the text be the base to prioritize the forward work plan since older documents may need to be aligned with the recent adopted texts.	<b>Saudi Arabia</b>
We suggest that priorities be arrange according to the important of texts and the extent of it's spead in international trade.	<b>United Arab Emirates</b>
Uruguay entiende debería priorizarse de acuerdo a la relevancia, a las necesidades técnicas y los avances científicos.	<b>Uruguay</b>
The United States would prefer prioritizing texts which were most recently adopted but notes that it is more important to be consistent with whichever prioritization method is chosen.	<b>USA</b>
Prioritising on the basis of age is a simple option but flexibility would need to be considered, if problems with newer texts are reported (pushing them up the priority list over older documents)	<b>ICUMSA</b>