



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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FORWARD WORKPLAN AND CRITERIA FOR EVALUATION AND PRIORITIZING NEW WORK

Comments submitted by Costa Rica, European Union, Japan, United States of America

COSTA RICA

Regarding provisional criteria and weighting values Costa Rica has no comments.

EUROPEAN UNION

Infections associated with consumption of fresh fruits and vegetables have shown that such commodities can cause even severe cases of foodborne illness. The EUMS hence support the prioritization of an overall work on the “Code of Hygienic Practice for Fresh Fruits and vegetables” as top priority. This would particularly address the general relevance of both public health and trade impact aspects linked to fresh fruits and vegetables. Annexes on tomatoes and carrots could be developed in parallel and in close coordination with the “Code of Hygienic Practice for Fresh Fruits and Vegetables” to avoid duplication of work or different approaches.

JAPAN

Comments on provisional criteria:

Japan supports the provisional criteria and weighting value.

In addition, Japan proposes the following weighting values for newly added working plan items:

CoHP on the Control of parasites in food: Public Health 10, Trade Impact 10 total 20

CoHP for the storage of cereals: - Public Health 8, Trade Impact 8, total 16

UNITED STATES OF AMERICA

GENERAL COMMENTS

We found that the weighting values for the criteria were not ideal for prioritizing work, as total values calculated for most proposed work in the forward work plan fell within a very narrow range (see Table 2 discussion to follow.) The U.S. suggests modifications to the proposed weighting system to better distinguish and prioritize proposals, as described below.

SPECIFIC COMMENTS

Comments on Annex I – The criteria and their proposed weighting value used to develop the “forward work plan”:

Currency of Information criterion:

We suggest that this criterion be considered first, in order to determine, in cases where a code already exists, whether there is justification for review/revision of existing codes. If an existing code is deemed to be sufficient, no new work should proceed. The sufficiency of an existing code should be considered prior to ranking of items. For example, if the guidance in a code adequately addresses the new information or is applicable to a new technology, the code would be considered sufficient and revision would not be needed.

We also recommend for consideration that individual weights be assigned for each of the bullets inserted in Table 1 below for this criterion.

Public Health Risk criterion:

It may be difficult to determine what should be considered a “potential” public health risk. Many hazards are adequately controlled, and pose minimal risk, where existing codes are followed. However, it would be inaccurate to say that there is “no” public health risk. Offering only 2 choices (“actual” = 10 and “potential” = 8), which are weighted so closely, results in “bunching” of proposals. Weighting values should be used that span high, medium and low risk, to further differentiate and help prioritize new work. (For example, high risk = 10, medium risk = 7, low risk = 4)

Public health risk should include consideration of outbreak frequency, illness occurrence, severity of illness, the likelihood of microbial or chemical contamination, potential for the food to support pathogen growth, food consumption patterns, the probability of contamination and steps taken during manufacturing to reduce contamination. In terms of establishing the meaning of “low, medium and high” for weighting purposes, we could consider the following: High = many outbreaks and thousands of illnesses over a 5 year period, Medium= one or more outbreaks and hundreds of illnesses over the past 5 years, and Low = no outbreaks and few illnesses. The working group should consider whether and how other factors noted above could be incorporated into the weightings.

A similar approach may be considered for chemical contaminants: High = Compelling evidence that a contaminant causes illnesses or serious adverse effects and is associated with a specific food or groups of foods; Medium = There is evidence that the chemical occurs in one or more food commodities and some indication of illness associated with the chemical; Low = There is an association of the chemical with a food, but there is little available evidence of illnesses.

We could consider a combined approach for microbiological and chemical contaminants.

Impact of Trade on Public Health criterion:

This criterion is not straightforward as written. For example, what information should be considered in determining trade impact? Should every commodity that is traded internationally receive a weight of 10? If so, the criterion becomes not very useful. Also, having the global impact weighted at 10 and regional impact rated at 8 provides a very narrow range of resulting weights. Items are not well differentiated using this criterion.

For this criterion, we propose that weights should reflect the global versus regional nature of trade, as well as relative consumption, in order to better prioritize proposals for new work. For example, proposals could be ranked as Global, High Consumption = 10; Regional, High Consumption = 8; Global, Low Consumption = 4; Regional, Low Consumption = 2

scoring system, work that is cross-cutting may be prioritized very high, even if the existing code is sufficient. This could cause some difficulties in prioritizing appropriately.

In terms of the overall format of Table 2, we would suggest adding a column to the table for comments, so that countries can include their rationale for ranking (e.g. reference new information that is available, etc.). We have included comments in the table below to explain our ratings or to identify issues.

Table 2. CCFH PROVISIONAL FORWARD WORK PLAN

	Title of work				Total
		Public Health	New information	Trade impact	
1	Code of Hygienic Practice on the Control of Parasites in Food	10	0 No existing code	10	20
2	Code of Hygienic Practice for the Storage of Cereals This issue seems more related to food security than food safety.	8 (Value seems too high.)	0 No existing code	10	18 (This value seems too high.)
3	Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) <i>(The annex for fresh leafy greens was completed in 2010, however the code is greater than ten years old and a review would also examine why additional annexes need to be developed)</i>	10	5 New information related to cantaloupes is available.	10	25
4	Development of an annex on tomatoes for the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003)	10	0	8	18
5	Development of an annex on carrots for the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003)	10 (Value seems too high.)	0	8	18 (This value seems too high.)
6	Code of Hygienic Practice for Bottled/Packaged Drinking Waters (other than natural mineral waters) (CAC/RCP 48-2001)	8	0 Existing code; no new information	10	18 (This value seems too high.)
7	Code of Hygienic Practice for Precooked and Cooked Foods in Mass Catering (CAC/RCP 2-1993)	10	5	0	15

	Title of work				Total
		Public Health	New information	Trade impact	
8	Code of Hygienic Practice for Low-acid and Acidified Low-acid Canned Foods (CAC/RCP 23-1993) Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CAC/RCP 40-1993) Guideline Procedures for the Visual Inspection of Lots of Canned Foods for Unacceptable Defects (CAC/GL 17-1993) Code of Hygienic Practice for Canned Fruit and Vegetable Products (CAC/RCP 2-1969)	8	0 (Unclear whether new information is available.)	10	18 (This value seems too high.)
9	Code of Hygienic Practice for the Transport of Food in Bulk and Semi-packed Food (CAC/RCP 47-2001)	0 (would recommend value of 2)	0 (Is current code sufficient?)	10	10
10	Code of Hygienic Practice for the Processing of Frog Legs (CAC/RCP 30-1983)	8 (Value seems too high.)	0 (Is current code sufficient? Is current code even needed?)	8 Value seems too high.)	16 Value seems too high.)
11	General Principles of Food Hygiene (CAC/RCP 1-2003) Annex: Guidelines for the Application of HACCP Systems	10 (?)	0 (Is current code sufficient?)	10 (?)	20
12	Code of Hygienic Practice for Refrigerated Packaged Foods with Extended Shelf-life (CAC/RCP 46-1999)	8 (likely should be lower)	0 (unclear whether new information is available)	8 (value seems too high)	16
13	Code of Hygienic Practice for Milk and Milk Products (CAC/RCP 57-2009)	10	0	10	20
14	Code of Hygienic Practice for Egg and Egg Products (CAC/RCP 15-2007)	10	5 (new data related to on-farm controls)	8	23 (This value seems too high.)
15	Code of Hygienic Practice for Meat (CAC/RCP 58-2005)	10	0 (unclear whether new information is available)	10	20

URUGUAY

Document's name:	Concerning Institution	Impact to Public Health
Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003) <i>(The annex for fresh leafy greens was completed in 2010, however the code is greater than ten years old and a review would also examine why additional annexes need to be developed)</i>	Ministry of Livestock, Agriculture, and Fisheries (MGAP, in Spanish). General Directorate of Farms (DIGEGRA, in Spanish).	YES
Development of an annex on tomatoes for the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003)	Ministry of Livestock, Agriculture, and Fisheries (MGAP, in Spanish). General Directorate of Farms (DIGEGRA, in Spanish).	YES
Development of an annex on carrots for the Code of Hygienic Practice for Fresh Fruits and Vegetables (CAC/RCP 53-2003)	Ministry of Livestock, Agriculture, and Fisheries (MGAP, in Spanish). General Directorate of Farms (DIGEGRA, by its Spanish acronym).	YES
Code of Hygienic Practice for Bottled/Packaged Drinking Waters (other than natural mineral waters) (CAC/RCP 48-2001)	Ministry of Health (MSP, in Spanish)	YES
Code of Hygienic Practice for Precooked and Cooked Foods in Mass Catering (CAC/RCP 2-1993)	Montevideo Municipality (IM, in Spanish)	YES
General Principles of Food Hygiene (CAC/RCP 1-2003) Annex: Guidelines for the Application of HACCP Systems	Ministry of Health (MSP, in Spanish). Uruguay's Technological Laboratory (LATU, in Spanish). Ministry of Livestock, Agriculture, and Fisheries (MGAP, in Spanish).	YES
Code of Hygienic Practice for Canned Fruit and Vegetable Products CAC/GL 2-1969	Montevideo Municipality (IM, in Spanish)	YES
Code of Hygienic Practice on the Control of Parasites in Food	Ministry of Livestock, Agriculture, and Fisheries (MGAP, in Spanish).	YES
Code of Hygienic Practice for the Storage of Cereals	Ministry of Livestock, Agriculture, and Fisheries (MGAP, in Spanish). General Directorate of Agricultural Services (DGSA, in Spanish). Uruguay's Technological Laboratory (LATU, in Spanish).	YES