



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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CCFH WORK PRIORITIES (PROPOSALS FOR NEW WORK AND/OR REVISION OF EXISTING STANDARDS)

Prepared by the United States of America

Background

1. The physical Working Group (pWG) for Establishment of CCFH Work Priorities, chaired by the United States of America, was held immediately before the 46th session of the Codex Committee on Food Hygiene (CCFH46). CCFH46 considered the Report of the pWG and agreed to re-establish the pWG for Establishment of CCFH Work Priorities under the chairmanship of the United States of America (see [REP 15/FH](#), paragraphs 74 - 84).
2. [CL 2015/17-FH](#) was sent out to all Members and interested International Organisations in June 2015. Members were invited to propose new work for consideration by the above pWG by 1 September 2015, in accordance with the *Criteria for the Establishment of Work Priorities* (see Codex Procedural Manual) and in accordance with the "Process by which the Codex Committee on Food Hygiene (CCFH) will undertake its work" (available at <http://www.codexalimentarius.org/infodoc>).

Based on the above:

3. In response to the above mentioned Circular Letter, proposals were submitted in conjunction with two discussion papers, as described below.

Proposals to prepare new standards and codes of hygienic practice

4. No proposals were submitted to prepare new standards and codes of hygienic practice.

Comments and proposals to revise existing standards and codes of hygienic practice

COMMENTS AND PROPOSALS SUBMITTED BY FRANCE AND THAILAND¹

5. France and Thailand, on behalf of an Electronic Working Group (eWG), prepared a discussion paper and project document on the need to revise the *General Principles of Food Hygiene* (CAC/RCP 1-1969, GPFH) and its Annex: *Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application* (the HACCP Annex) (see [CX/FH 15/47/9](#)).
6. The eWG considered three areas, which are addressed further in the discussion paper, ([CX/FH 15/47/9](#)): (I) Structure of the document(s), (II) GPFH/HACCP concepts and (III) Other aspects, including terminology questions, HACCP principles, specific difficulties of understanding or implementing the current texts, and the need for more guidance on some aspects such as the determination of critical control points, the establishment of critical limits, etc.
7. The discussion paper makes a number of recommendations:
8. That the Committee consider new work (and establish a working group) on the revision of the *General Principles of Food Hygiene* and its Annex: *Hazard Analysis and Critical Control Point (HACCP) System and*

¹ Project Document is attached as Appendix 1.

Guidelines for its Application (CAC/RCP 1-1969), with an introduction and two distinct parts (*General Principles of Food Hygiene* and an annex on HACCP) and seven HACCP principles;

9. That it be kept in mind that the revised text should be useful to all types of stakeholders. Therefore, it should be as simple as possible and provide more flexibility to small and medium enterprises, or to businesses developing innovative food processes, in order to achieve wider application while maintaining consumer safety;

10. That consideration be given to whether the document is aimed at dealing with managerial aspects, thereby instructing Food Business Operators (FBOs) on how to manage their quality and safety system, and if the title should be modified accordingly. If so, it could be necessary to determine how FBOs should address concepts such as supplier management, the role of auditing, contract manufacturing, storage procedures and processes, change management, continuous improvement, Good Agricultural Practices;

11. That consideration be given to whether the GPFH include primary production, and address the safety aspects (i) of foods that go directly to the consumer as ready-to-eat (e.g. berries, produce that will not be cooked/peeled/hulled before eating), and (ii) of final delivery to the consumer (e.g. retailers);

12. That consideration be given to whether items that are common to both parts of the document (such as product and process description, validation, monitoring, verification) are presented first in the introduction and then developed in both GPFH and HACCP (while emphasizing that their application could be more rigorous in the HACCP context than in the GPFH one);

13. That consideration be given to revising the definition section in the introduction. Especially, clear definitions for the following terms could be added: "good hygiene practice," "prerequisite programs," "potable water," and "clean water." Additionally, in relation to HACCP, consideration should be given to clarifying the use of "essential" and "critical" in relation to HACCP, since many do not consider these to be equivalent but the terms appear to be so according to the CCP definition;

14. That consideration be given to elaborating a sequential systematic approach to be implemented for hazard identification and analysis in order to allow for (i) establishing a preliminary list of potential hazards independently of consideration of GHP implementation, and (ii) determining a shorter list of significant hazards to be addressed in the HACCP plan that takes into account the GHP measures implemented;

15. That consideration be given to examining the need for a class of control measures essential to control hazards for which management as CCPs presents challenges;

16. That consideration be given to removing the expression "condition of" in the definition of the term "Hazard" while including an explanation in the definition, providing another term or addressing where appropriate choking hazards and foods associated with illness but in which the hazardous substance cannot be identified;

17. That references to "*Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CAC/GL 21-1997)" to provide more guidance on Microbiological Criteria; "*Guidelines for the Validation of Food Safety Control Measures* (CAC/GL 69-2008)" to provide more guidance on validation; "WHO Guidelines for Drinking Water Quality" on the use of water, and the "Code of practice for fish and fishery products" (CAC/RCP 52-2003) on the use of clean vs. potable water)" be included;

18. That the distinction between validation and verification, for instance by amending the contents of Step 8 (Principle 3) and Step 11 (Principle 6) in order to clarify validation related to those steps be addressed;

19. That further guidance on: (i) The control of chemical contaminants, including allergens and mycotoxins; (ii) How to use the current decision tree; and, if appropriate, adding decision trees related to chemical or physical hazards; and (iii) The establishment of science-based critical limits for CCPs and their proper use be elaborated.

COMMENTS AND PROPOSALS SUBMITTED BY BRAZIL AND FRANCE²

20. France and Brazil, on behalf of an eWG, prepared a discussion paper and project document on a revised draft of the *Code of Hygienic Practice for Fresh Fruit and Vegetables* and its annexes (CAC/RCP 53-2003) (see [CX/FH 15/47/8](#)).

21. A revised Code had been presented at CCFH46. The revision had been done in order to address duplications, redundancies and identify provisions that could be missing.

² Project Document is attached as Appendix 2.

22. The revised draft of the *Code of Hygienic Practice for Fresh Fruit and Vegetables* and its annexes contained changes, such as including some new definitions and references to other Codex documents, organizing the text in a more logical sequence, deleting redundancies, merging paragraphs with the same subject and moving paragraphs from the annexes to the main document.

23. The eWG established by CCFH46 was to review the consolidated Code and identify any additional changes for consideration at the next session. It was understood that if substantial changes were to be made to the Code (e.g. additional sections and provisions), the eWG would also prepare a project document for new work.

24. The eWG identified a number of additions that were considered "technical amendments." Other changes were potentially more substantive, such as expanding the scope to include provisions to the consumption stage (e.g. retail and foodservice), adding definitions, revising definitions, and qualifying certain text.

25. The issue that generated the most discussion was the quality of water for the different uses and the meaning of suitable quality water. CCFH will need to decide how to address this issue, whether in this document or another one.

26. The majority of the eWG members were of the opinion that it was necessary to obtain approval for new work, not only because the scope was expanded, but also due to the text being moved from the Annexes to the main Code and the several "technical amendments" that, taken together, could be sufficient to justify a new work proposal.

27. The eWG recommended that CCFH consider the necessity to start new work to continue revising the Code (for which the draft revised Code in Appendix II of [CX/FH 15/47/8](#) could be circulated as a starting point for the revision), and how to address the issue raised in the eWG regarding the parameters for clean water according to its use.

Recommendations:

28. In respect of proposals to revise existing standards and codes of hygienic practice, Members may review the proposals to consider whether it is appropriate for CCFH to undertake the work and to prioritize them.

APPENDIX 1

PROJECT DOCUMENT

Revision of the *General Principles of Food Hygiene (CAC/RCP 1-1969)* and its HACCP Annex**1. Purpose and Scope of the Standard**

The *General Principles of Food Hygiene (CAC/RCP 1-1969)* and its Annex: Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application provide food business operators worldwide with the basis for producing food that is safe and suitable for consumption. Since its inception in the early 1970s, HACCP has become the universal system for the control of food safety, on which most regulatory food control systems and international food safety standards (e.g. ISO 22000) are based. HACCP, or a similar approach of identifying hazards and establishing controls to prevent them, has also been used in guidance on the safety of feed and drinking water.

2. Relevance and Timeliness

The General Principles of Food Hygiene (GPFH) is the basis for all codes of hygienic practice developed by CCFH. This standard is widely used and referenced internationally. There are several initiatives ongoing to update, in particular, the concept of HACCP. However, because *Codex Alimentarius* standards are the basis for international acceptance, it is important for the Committee to ensure that the General Principles of Food Hygiene and the Annex on HACCP provide the best available guidance based on current scientific information.

At its 46th session, CCFH agreed to explore further if GPFH and its HACCP annex needed to be revised. An eWG, co-chaired by Thailand and France, established a questionnaire in order to identify specific items that could benefit from improvement through the *Codex alimentarius* standardization process.

3. Main aspects to be covered

As GPFH and its HACCP annex are currently recognized for providing a common ground for the control of food safety worldwide, the whole document deserves a regular update. The discussion conducted by the eWG on the need to revise GPFH and its HACCP annex underlined that such a revision should address several issues regarding the articulation of the two parts of the document, or within the content of each part. Those potential improvements should be aimed at making the standard easier to understand and to enforce for all members of the food chain or at clarifying some aspects that seem ambiguous. Areas that may be considered in a revised GPFH and HACCP annex include:

- Clarify the scope of GPFH and its HACCP annex, especially in order to determine whether the document should encompass aspects of quality management;
- How to better address concepts that are common to both parts of the document, considering that they might not be as rigorously applied regarding GPFH or HACCP enforcement;
- Complete the definition section with the following terms: “good hygiene practice”, “prerequisite programs”, “potable water”, and “clean water”. Additionally, in relation to HACCP, the use of “essential” and “critical” should be clarified.
- Establish a sequential systematic approach to determine a list of relevant risk to complete the hazard identification step of HACCP;
- Examine the need for a class of control measures essential to control hazards for which management as CCPs presents challenges;
- Consider whether the removal of the expression “condition of food” could lead to improve the common understanding of the definition of “hazard”;
- Inclusion of relevant references to other FAO/WHO guidance, where appropriate;
- Distinguish validation from verification within Principle 6;
- Establish further guidance on chemical contaminants, including allergens and mycotoxins, on potential improvement of the decision tree and on the establishment of science based critical limits for CCPs and their proper use.

4. Assessment against the Criteria for the establishment of work priorities

4.1 The text needs to be revised in order to meet the General criterion: Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries.

The proposed work is directed at revising the most central standard in food hygiene, in order to make it more logical and user-friendly and to better address emerging and new hazards. Furthermore, such a revision could lead to help implementation by small and/or less-developed food businesses in both developed and developing countries and to better encompass the whole food production sector.

4.2 Diversification of national legislations and apparent resultant or potential impediments to international trade

Food safety legislation widely refers to the Codex HACCP principles, as do many international standards giving food businesses access to more lucrative markets, but as the application of the HACCP principles can differ among countries it can cause impediments to international trade. A document that fosters a more consistent approach can reduce impediments to international trade. Furthermore, an harmonized glossary could improve common understanding through the whole food chain and between every kinds or agro-food businesses.

4.3 Scope of work and establishment of priorities between the various sections of the work

The proposed work would consist on the revision of the different sections of the standard CAC/RCP 1-1969, e.g. its General Introduction, the GPFH part and the HACCP annex. Indeed, it appears that the whole structure of the document needs to be rearranged, particularly because of concepts that seem to be common for the two sections. Several improvements have also been proposed for each part of the standard by participants of the eWG on the need to revise GPFH and its HACCP annex.

The proposed schedule is as follows:

- a) Revision of the General Introduction to clarify concepts and terms that are useful in the frame of both GPFH and HACCP, and to avoid repetitions, and revision of the HACCP annex, as this section is the most critical for food businesses and needs urgent modification to encompass emerging issues;
- b) Revision of the GPFH, taking into account the improvements of HACCP; and
- c) Final verification of the soundness and consistency of the whole revised standard.

4.4 Work already undertaken by other international organizations in this field

In the ISO, work has recently started on a revision of its HACCP standard, ISO 22000. ISO 22004 is now the most updated available standard in this field.

4.5 Amenability of the subject of the proposal to standardization

– This revision concerns the most central food hygiene standard of Codex.

4.6 Consideration of the global magnitude of the problem or issue

– This standard is applied worldwide to practically all commercial food processes. If a revision can make it more effective and user-friendly, results will include improved food safety, more efficient food control, and increased food trade. It can provide a sound common ground for every food hygiene sectorial standards and codes of hygienic practices.

5. Relevance to the Codex strategic objectives

The proposed work directly relates to the following Codex Strategic Goals from the 2014-2019 Strategic Plan.

Strategic goal 1: Establish international food standards that address current and emerging food issues

The revision of these texts is consistent with all three Objectives of this strategic goal. At the 45th and 46th Sessions of the Codex Committee on Food Hygiene, the revision of the GPFH and HACCP texts was indicated as a top priority in the Committee's forward work plan. Therefore, an eWG was settled to explore further that possibility, with massive involvement of Codex members and observer organizations. A number of those stakeholders have been actively involved in identifying issues of concern that could be addressed in a revision. The revised standard will provide important information for all countries and agro-food businesses of all kinds in order to achieve a higher level of food safety.

Strategic goal 2: Ensure the application of risk analysis principles in the development of Codex standards

Risk analysis as it applies to food safety across the food chain is an internationally accepted discipline and forms an integral part of any well-designed food safety control system. Through an active involvement of scientific and technical experts from many Codex members and observers we aim for a revised standard addressing all recent developments in the field of food safety risk management. eWG members participation already identified gaps in addressing hazards from allergens or mycotoxins, for instance.

Strategic goal 3: Facilitate the effective participation of all Codex Members

The revision of these universal texts should generate great interest and broad participation from all members. Through the revision process, it should be kept in mind that one of the main challenges is to produce a user-friendly document that could be enforced as widely as possible. Specific attention should be granted to small enterprises and to developing countries.

Strategic goal 4: Implement effective and efficient work management systems and practices

More expeditious and efficient work by Codex is necessary to provide members and international organizations with the standards, guidelines and recommendations that they need. During the revision, all working documents and electronic discussions will be distributed in a timely and transparent manner, using web-based technologies available freely to all.

This strategic goal is one of the core objective of the revision of this standard, as it will provide a solid ground for all Codex works related to food hygiene.

6. Information on the relation between the proposal and other existing Codex documents

The revised text will build on the *General Principles of Food Hygiene* (CAC/RCP 1-1969) and its Annex: Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application. Due to the centrality of the texts to food hygiene, it is foreseen that a technical alignment of texts may subsequently be needed in related Codex standards.

The following documents have already been identified to be added as references within the revised document: “*Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods* (CAC/GL 21-1997)”, “*Guidelines for the Validation of Food Safety Control Measures* (CAC/GL 69-2008)”, “WHO Guidelines for Drinking Water Quality” and the “Code of practice for fish and fishery products” (CAC/RCP 52-2003);

7. Identification of any requirement for and availability of expert scientific advice

We think that FAO/WHO could facilitate this effort by reviewing their guidelines related to HACCP or specific guidance (for instance, addressing water quality) and determining if there is information useful to address the concerns raised in the accompanying Discussion paper. The information will then be used to better define the Scope of the documents under revision, and to what extent new guidance is needed. Also, a number of Codex observer organizations seem to be willing to provide the expertise they have in improving the content of the document or to make it easier to use for businesses.

8. Identification of any need for technical input to the standard from external bodies so that this can be planned for

Technical input is expected from the International Commission of Microbiological Specifications for Foods (ICMSF), the International Organization for Standardization (ISO), and other international standard-setting organizations. Such input is important as these organizations would be among the organizations that would be applying the information in a revised text on the general principles for food safety control systems.

9. The proposed time-line for completion of the new work, including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission

Proposed time line: The work conducted by the eWG since the 46th session of CCFH allowed to identify the main items that need improvement and to provide alternative ways forward. A five-year timeline is proposed for the completion of the revision of the *General Principles of Food Hygiene* (CAC/RCP 1-1969) and its HACCP Annex. A proposed revised document would be ready for discussion at Step 3 by the CCFH in 2016, with a proposed date for adoption at Step 5 in 2018 and adoption at Step 8 in 2019.

PROJECT DOCUMENT**PROPOSAL FOR NEW WORK ON THE REVISION OF THE “CODE OF HYGIENIC PRACTICE FOR FRESH FRUITS AND VEGETABLES (CAC/RCP 53-2003)”****1. Purpose and Scope of the new work**

The purpose of the proposed new work is to revise “CODE OF HYGIENIC PRACTICE FOR FRESH FRUITS AND VEGETABLES (CAC/RCP 53-2003) and delete redundancies/duplication, revise the scope and make editorial changes, add definitions and specific provisions regarding hygiene in the environment and cleaning programs.

2. Relevance and timeliness

The *Code of Hygienic Practice for Fresh Fruit and Vegetables* was adopted by CAC in 2003. Since then, many Codes of Hygienic Practice for specific fruit and vegetables were adopted and added as Annexes to the Code. However, slightly different wording was used, text was sometimes duplicated and some of the provisions do not fit the scope of the main code. Continued outbreaks of foodborne illness attributed to fresh produce have led to the identification of new sources of contamination and additional control measures to minimize the potential for illness.

3. Main aspects to be covered

A number of changes will be considered. Some will be technical amendments, others will include new definitions. The objective and the scope need to be expanded to include provision throughout the food chain from "primary production to consumer" as well as to accommodate the inclusion of specific provisions from the Annexes.

4. Assessment against the criteria for the establishment of work priorities

The proposed work falls under the general criterion for establishment of work priorities, because the use of the Code will strengthen protection of consumers by ensuring food safety. This work also seeks to promote fair practices in food trade taking into account the identified needs of developing countries.

The proposed work is directed primarily at control of microbial hazards in fresh fruit and vegetables. Fresh fruits and vegetables are part of the basic diet worldwide, and therefore widely traded. Through updating the information and structure of the document, the revision of this Code aims to facilitate understanding of the guidance in matters of hygiene for fresh fruits and vegetables.

Other criteria applicable to general subjects for the establishment of work priorities of the Procedural Manual:

(a) Diversification of national legislations and apparent resultant or potential impediments to international trade - it is covered by the preceding paragraph.

(b) Scope of work and establishment of priorities between the various sections of the work- see above section on purpose and scope.

(c) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies) - no other similar work undertaken by other international organizations.

(d) Amenability of the subject of the proposal to standardization – it is amenable to standardization – the Code is already adopted, and the revisions will be simply to streamline the Code – there should be no problem with standardization.

(e) Consideration of the global magnitude of the problem or issue - it is covered by the preceding paragraph.

5. Relevance to Codex Strategic Goals³

The proposed work falls under 3 Codex Strategic Goals:

Strategic goal 1. *Establish international food standards that address current and emerging food issues.*

³ http://ftp.fao.org/codex/Publications/StrategicFrame/Strategic_plan_2014_2019_EN.pdf

Strategic goal 2. *Ensure the application of risk analysis principles in the development of Codex standards:* this work will help in establishing of risk management options and strategies to prevent outbreaks from the consumption of fresh fruits and vegetables.

Strategic goal 4. *Implement effective and efficient work management system and practices:* reviewing and implementing the recommended practices from primary production to consumption can help the control of microbiological contamination in fresh fruits and vegetables.

6. Information on the relationship between the proposal and other existing Codex documents

The revised Code will build on the *General Principles of Food Hygiene* (CAC/RCP 1-1969), the *Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Food* (CAC/GL 79-2012), the *Code of Practice for Packaging and Transport of Fresh Fruits and Vegetables* (CAC/RCP 44-1995), the *Code of Practice for the Processing and Handling of Quick Frozen Foods* (CAC/RCP 8-1976) and on “*Code of Hygienic Practice for Fresh Fruits and Vegetables* (CAC/RCP 53-2003)”.

7. Identification of any requirement for and availability of expert scientific advice

Additional scientific advice is not necessary at this moment.

8. Identification of any need for technical input to the standard from external bodies

There is no need for additional technical input from external bodies.

9. The proposed timeline for completion of the new work, including the starting date, proposed date for adoption at step 5 and the proposed date for the adoption by the Commission.

2015 (November) - Consideration of the discussion paper and proposed new work at CCFH47.

2016 (July) - Approval of the work by CAC39.

2016 (November) - Circulate for comments at Step 3, consideration of the proposed draft revision at CCFH48.

1. 2017 (July) - Adoption at Step 5/8 by CAC40.