

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

# E

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda item 6

CX/FH 22/52/6 Add.1

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

Codex Committee on Food Hygiene

Fifty-second Session

Virtual

28 February – 4 March and 9 March 2022

PROPOSED DRAFT DECISION TREE

(REVISION OF THE *GENERAL PRINCIPLES OF FOOD HYGIENE* (CXC 1-1969))

Comments in reply to CL 2021/62-FH

*Comments of Argentina, Australia, Bolivia (Plurinational State of), Canada, Colombia, Costa Rica, Cuba, El Salvador, European Union, India, Iran, Iraq, Japan, Kenya, Malaysia, Mexico, New Zealand, Peru, Philippines, Republic of Korea, Saudi Arabia, Thailand, Uruguay, USA and FoodDrinkEurope, ICUMSA, IDF/FIL*

### Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2021/62-FH issued in October 2021. 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.

**Annex I**

<b>GENERAL COMMENTS</b>	<b>MEMBER / OBSERVER</b>
Argentina accepts and recommends the inclusion of a tool (tree or table) in the General Principles of Food Hygiene (CXC 1-1969), but opposes the incorporation of the term “Enhanced Good Hygiene Practices.”	<b>Argentina</b>
Bolivia believes that the inclusion of Annex 1, “Example of a CCP Decision Tree,” is appropriate.	<b>Bolivia (Plurinational State of)</b>
<p>The decision tree format is generally easier to understand, however, Canada believes that it would only be suitable if question 1 is removed.</p> <p>In the analysis provided in CX/FH 22/52/6, it was mentioned that if we delete question 1, one of the main modifications of the document, which is the possibility of all hazards (significant or not) being controlled by GHP (routine or of greater attention) will not be reflected. However, Canada believes that this aspect is reflected elsewhere in the document and should not be reflected in the CCP Decision Tree.</p> <p>The guidance in step 6 (Principle 1 Conduct a hazard analysis and identify control measures) is meant to help FBOs determine significant hazards that need to be addressed in the HACCP plan (with the use of diagram 2 Example of Hazard Analysis Worksheet); the idea is that, at step 7 (Principle 2 Determine the Critical Control Points (CCPs)), only significant hazards are to be considered, as indicated in the second sentence: “Critical Control points are to be determined only for hazards identified as significant as of the result of a hazard analysis”.</p> <p>The Decision Tree is only referred to at step 7, so question 1 of the decision tree does not work. Question 1 would be addressed in step 6 during the hazard analysis and step 7 would not be performed for significant hazards that are being controlled by a GHP that require greater attention, as already determined in step 6.</p> <p>The example of a CCP determination worksheet is also a suitable option.</p>	<b>Canada</b>
The EUMS can support the proposed Decision Trees. Nevertheless, the EUMS would like to express their concern that the “Example of a CCP determination worksheet” (Annex 2) may result in the identification of a lot (disproportionally high number) of CCP by the application of a two step (GHP-CCP) approach.	<b>European Union</b>
<p>Supports the inclusion of CCP decision tree as per Annex I in the General Principles for Food Hygiene (CXC 1-1969).</p> <p>Rationale:</p> <p>Decision tree covers most of the situations as hygiene is concerned.</p>	<b>India</b>
Agree with proposal with no comments.	<b>Iraq</b>
<p>Kenya supports and still finds the proposed option more suitable as its use is flexible in the entire food value chain. The modifications made to the questions of the CCP Decision Tree made it more clear, objective and straight forward. Kenya also support the inclusion of the CCP determination worksheet for use in conjunction with the CCP Decision Tree, in order to address the concerns of question 1 of CCP Decision Tree.</p> <p>Kenya therefore, finds the proposal acceptable and supports the inclusion of two proposals in the General Principles for Food.</p>	<b>Kenya</b>
<p>We prefer Annex I “Example of a CCP Decision Tree”</p> <p>Justification:</p> <p>We consider that this example offers a more linear and schematic view that facilitates understanding and decision-making.</p>	<b>Mexico</b>

New Zealand supports the inclusion of both the proposed revised Annex 1 Example of a CCP Decision Tree and Annex 2 Example of a CCP Determination Worksheet in the General Principles of Food Hygiene and its HACCP Annex.	<b>New Zealand</b>
Peru is in favor of changing the questions in OPTION ONE in the decision tree.	<b>Peru</b>
The Philippines agrees with the proposal to include Annexes 1 and 2. Annex 1 will be the decision tree and the Annex 2 will be the template in tabular form where the justification while going through the decision tree is documented.	<b>Philippines</b>
The Republic of Korea suggests the Annex 1 to be included in the revised General Principles for Food Hygiene (CXC 1-1969). The first diagram has the better readability for readers to understand the text than the second one.	<b>Republic of Korea</b>
Saudi Arabia finds the decision tree and the CCP identification worksheet suitable for inclusion in the revised General Principles for Food Hygiene (CXC 1-1969).	<b>Saudi Arabia</b>
Thailand is of the opinion that the Example of decision tree in the revised and now adopted CXC 1 – 1969 should be in line with the Diagram 2 Example of Decision Tree to Identify CCPs from the CXC 1 – 1969, revised in 2003. The Decision Tree in the former CXC 1 – 1969 has been globally used and understood by all users. The major change in the order or detail will result in confusion and the need for re-conceptualization of FBOs in identifying the CCPs, especially small and less developed businesses. The similar pattern of the Decision Tree in the former CXC 1 – 1969 should be kept with minimum change if necessary, and the addition of Q1.	<b>Thailand</b>
<p>In general, the country agrees with the changes and the proposed narrative for the decision tree</p> <p>However, in the former question 5: Can this step prevent, reduce or eliminate the hazard to an acceptable level? If the answer is “No,” in the option “Modify the step, process or product to implement control measure,” we suggest the addition of a footnote. This footnote would read: “You must return to the start of the decision tree.”</p> <p>Rationale: When modifying the step, the process, or the product to implement a control measure, we must ensure hazards are controlled.</p> <p>It is unclear whether both documents will remain in the annex to the general document, to be used indiscriminately by food business operators. We also do not understand why the questions on the worksheet in Annex 2 are not the same as in the new decision tree. Whatever the case may be, Uruguay believes Annex 1 is more appropriate.</p>	<b>Uruguay</b>
<p>CCFH was invited to consider the “Example of a Critical Control Point (CCP) Decision Tree” and “Example of a CCP determination worksheet” and whether either of the two proposals would be suitable for inclusion in the General Principles for Food Hygiene (GPFH) (CXC 1-1969). The United States believes that both the CCP decision tree and the CCP determination worksheet provide useful examples for annexes to the General Principles for Food Hygiene (CXC 1-1969); we suggest some minor revisions.</p> <p>First, after reviewing the Background in CX/FH 22/52/6 and obtaining input from stakeholders about the revised decision tree, we think that CCFH is unlikely to arrive at a single decision tree (or worksheet) that works for everyone – nor do we believe it is necessary to do so. We received several suggestions for alternatives to the decision tree. The decision tree is given as an example of a CCP decision tree, thus implying that there could be others. CCFH should consider whether more than one example would be helpful. Some stakeholders have indicated that the decision tree to identify CCPs in the former HACCP Annex to CXC 1-1969 has been helpful; with some minor modifications for consistency with the revised GPFH, it could be included.</p> <p>We have also attached 2 additional decision trees for CCFH consideration: one is a simplified decision tree that does not include a question about whether a hazard can be controlled by prerequisite programs such as GHPs and a second that addresses whether a step involves a CCP or a GHP that requires additional attention (which was an area of confusion in the development of the GPFH). We suggest that an annex titled “Decision Support Tools” could contain more than one CCP Decision Tree and the CCP Determination Worksheet.</p>	<b>USA</b>

<p>CCFH may want to reconsider the need for Q1 (Can the hazard be controlled at this step by prerequisite programs (e.g. Good Hygiene Practices (GHPs))?) if a significant number of members think it should not be part of a decision tree to identify CCPs (since the starting point for determining the need for CCPs is that the hazard cannot be adequately controlled through GHPs). The decision tree for CCPs does not need to consider whether GHPs or other prerequisite programs can control the hazard (i.e., delete Q1); the footnote to Q1 can be applied to the title of the decision tree and modified to say: “Applied after a hazard analysis determines that a hazard cannot be sufficiently controlled by prerequisite programs such as GHPs (which could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording)).” This also avoids having to consider whether the GHPs or other prerequisite programs control a hazard at a specific step, since in general GHPs/prerequisite programs that address hazards are applied more broadly than at single steps in the production process. The United States can support this approach to eliminate Q1, as we have concerns about people saying that prerequisite programs control all hazards (i.e., not assigning a CCP to a control measure because they consider the control to be a prerequisite program).</p>	
<p>We are not in favour of introducing the proposal or any other decision tree / determination worksheet into CXC 1-1969 and recommend to keep revised CXC 1-1969 (v2020) as it is.</p> <p>The proposal suggests that hazard analysis just consists in identifying and implementing CCPs while there are other control measures that can achieve acceptable hazard levels in foods though they are not managed as CCPs.</p> <p>It has proven challenging to develop a universal decision tree that can articulate 3 levels of control (GHP/GHPa/CCP of Codex or PRP/OPRP/CCP of ISO 22000) that is indisputable and suitable to all cases.</p> <p>There have been years if not decades of debates that didn't bring any value, operationally at least. This is moving focus away from what matters: in case of significant hazard, teams know what to monitor, what action to take in case of deviation, and this is validated and verified. All this is already clearly specified in revised CXC 1-1969. If necessary, FBOs can develop a decision tree that meets Codex guidance and is suitable to their case</p> <p>We therefore propose that the Committee abstains from introducing any decision tree/ determination worksheet.</p>	<b>FoodDrinkEurope</b>
<p>Both the decision tree and CCP worksheet are generic but may be useful if a 'worked example' was available. If a majority of reviewers agree that these are useful, they should be included in CXC 1-1969.</p>	<b>ICUMSA</b>
<p><b>SPECIFIC COMMENTS</b></p>	
<p><b>ANNEX 1 EXAMPLE OF A CCP DECISION TREE</b></p>	
<p>Argentina believes both suggestions could be incorporated in the General Principles of Food Hygiene (CXC 1-1969), and is in favor of including the “Example of a CCP determination worksheet,” albeit with the following edits:</p> <p>i) In the title, replace “(Apply to each Step for a Specified Hazard)” with “(Apply to each Step for a Significant Hazard)” for the sake of consistency between the table and its title.</p> <p>ii) Change the format of the worksheet to a decision tree, keeping the questions unchanged, in order to make this tool more visual and user-friendly.</p>	<b>Argentina</b>
<p>We support inclusion of a simple CCP Decision Tree, noting the following comment on the current decision tree.</p> <p>At question 2, the decision tree reads “This step is not a CCP. A subsequent step should be a CCP.” This assumes there is a subsequent CCP. In case there is no subsequent CCP (in which case the step, process or product should be modified), is a linkage to downstream questions required if a “no” answer to Q2 is given, to ensure a control measure is implemented?</p>	<b>Australia</b>

<p>One suggestion could be to remove the assumption of a subsequent CCP by rewording it to “This step is not a CCP. If there is no subsequent CCP then the process should be modified?”.</p>	
<ul style="list-style-type: none"> <li>• Include a General Note at the beginning relating to Annex 1</li> </ul> <p>General Note: “Understand that all hazards included in the decision tree are significant based on the Hazard Analysis (likelihood of a hazard exceeding acceptable levels in absence of additional controls X severity of hazard’s health impacts).”</p> <p>Rationale: This is to emphasize that the decision tree is used only for Significant Hazards as identified by the Hazard Analysis.</p> <ul style="list-style-type: none"> <li>• Include the term “significant” in question 1</li> </ul> <p>Q1: Can the significant hazard be controlled at this step by prerequisite programmes (e.g., GHPs)?</p> <p>Rationale: This is to emphasize that the decision tree is used only for Significant Hazards as identified by the prior Hazard Analysis.</p> <ul style="list-style-type: none"> <li>• Include the term “specific” in question 2</li> </ul> <p>Q2: Do specific control measures exist at this step?</p> <p>Rationale: The term “specific” is included to help clarify whether the control measure analyzed at this step is specific to the relevant hazard and stems from the business’s specific process and characteristics, rather than being part of prerequisite programmes.</p> <ul style="list-style-type: none"> <li>• Change the order of questions 3 and 4</li> </ul> <p>Rationale: Question 2 is about whether specific control measures exist at this step. Changing the order would be logical as question 4 has to do with the control measures’ ability to prevent, reduce or eliminate the hazard to an acceptable level at this step.</p> <p>Q3: Can this step prevent, reduce or eliminate the hazard to an acceptable level? YES: This step is a CCP; NO: Q4</p> <p>Q4 Will a subsequent step eliminate the identified hazard or reduce its likely occurrence to an acceptable level? YES: This step is not a CCP. A subsequent step should be a CCP; NO: Modify the step, process or product to implement a control measure.</p>	<p><b>Bolivia (Plurinational State of)</b></p>
<p>Q1. Suggest to delete question 1.</p> <p>Suggest modification to Q2 for clarification.</p> <p>Q2. Do control measures for this hazard exist at this step?</p> <p>Suggest modification to Q3 for consistency with the rest of the document.</p> <p>Q3. Will a subsequent step prevent or eliminate the hazard or reduce it to an acceptable level?</p> <p>Suggest modification to Q4 for consistency with the rest of the document.</p> <p>Q4. Can this step prevent or eliminate the hazard or reduce it to an acceptable level?</p>	<p><b>Canada</b></p>
<p><del><b>Annex 1 - “Example of Annex 1 - “Example of a a CCP Decision Tree (Apply to each Step for a Specified Hazard).”</b></del> <b>CCP Decision Tree (Apply to each Step for a Specified Hazard)”.</b></p> <p>After reviewing the proposed decision trees, we think Annex 1 – “Example of a CCP Decision Tree (Apply to each Step for a Specified Hazard)” is the most appropriate option as it provides more clarity as to whether a step in the process establishes a CCP.</p>	<p><b>Colombia</b></p>
<p>Current Q1. Can the hazard be controlled at this step by Good Hygiene Practices (GHPs)?</p>	<p><b>Costa Rica</b></p>

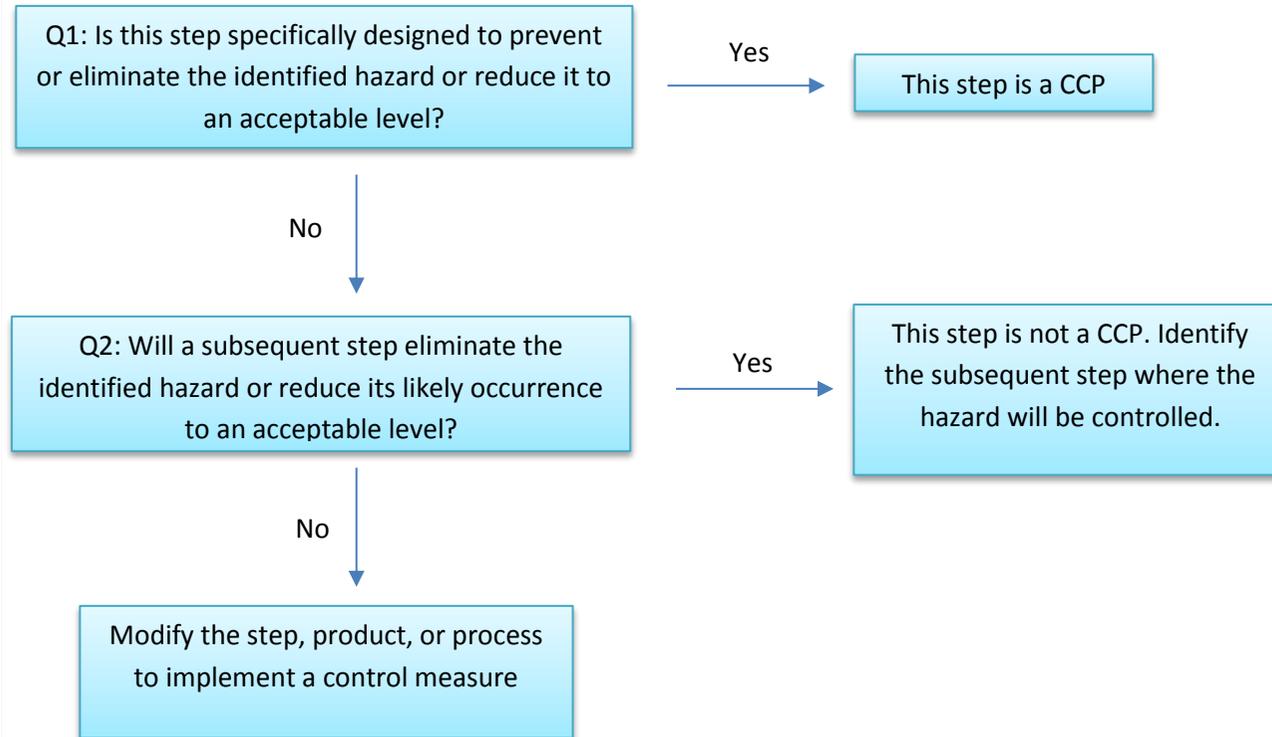
<p>Suggested Q1. Costa Rica would like to make the following observations:</p> <p>1) Add the terms “identified” and “prerequisite programmes” to rephrase the question as follows: Can the identified hazard be controlled at this step by prerequisite programmes (e.g., GHPs)?*</p> <p>Rationale: The phrase “prerequisite programmes,” which has been proposed for this question, is broader; some hazards can be prevented using prerequisite programmes other than GHPs.</p> <p>With respect to the note (*Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by GHPs. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording). Costa Rica suggests replacing, in the Spanish, the term “<i>gravedad</i>” with “<i>severidad</i>,” [Translator’s Note: This change does not impact the English] and, in both versions, “GHPs” with “other prerequisite programmes” while adding “sufficiently.” The text would read as follows: “*Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by other prerequisite programmes. This could mean routine GHPs or GHPs requiring more care in order to control the hazard (e.g., surveillance and registration).”</p> <p>Question 2</p> <p>R/ Costa Rica supports changing the question as it is more important and logical to start by identifying a control measure at the step currently being assessed, before we consider whether the hazard could be controlled at a subsequent step.</p> <p>Question 3</p> <p>R/ Costa Rica supports the wording currently proposed for this question.</p> <p>Question 4</p> <p>R/ Costa Rica supports question 4, with the following change in wording: “Can the control measure applied at this step reduce or eliminate the hazard to an acceptable level?”</p> <p>Rationale: The term “prevent” refers to prerequisite programmes, which have already been considered in question 1.</p> <p>Question 5</p> <p>R/ Since it has been repositioned as question 4, Costa Rica does not have any comments.</p> <p>Question 6</p> <p>R/ Costa Rica supports the deletion of this question.</p> <p>Rationale: Users could answer that no controls are necessary and fail to consider other major risks.</p>	
<p>Cuba is in favor of Annex 1 of the CCP Decision Tree outlined in document CX/FH 22/52/6 as we believe it is easier to understand for its users.</p>	<p><b>Cuba</b></p>
<p>We support Annex 1 “Example of a CCP Decision Tree.” We believe its inclusion into the ‘General Principles of Food Hygiene (CXC 1-1969)’ is warranted as it provides businesses with more opportunities to:</p> <ul style="list-style-type: none"> <li>• Based on this example, produce decision trees based on the specific needs of each establishment.</li> <li>• Manage results more easily to make decisions relating to Critical Control Points.</li> <li>• The footnote includes options such as the implementation of GHPs in order to eliminate the hazard after assessing its likelihood.</li> <li>• It also includes the control measure as Q2 for each step instead of waiting until Q4, which will be useful as it will help the food industry</li> </ul>	<p><b>El Salvador</b></p>

<p>consider modifying the process or the product as appropriate.</p> <ul style="list-style-type: none"> <li>We believe it helps better understand the contents of CXC 1-1969 in Chapter Two, HACCP STEP 7, principle 2: Determine Critical Control Points.</li> </ul>	
<p>We believe only Annex 1 is suitable.</p>	<p><b>Iran</b></p>
<p>Q2 Japan proposes to delete the Question 2.</p> <p>Rationale: In the GPFH, "control measure" could be GHP, GHP with greater attention, or control measures at CCP. Therefore Q2 has no added value in this DT. Without Q2, the DT works.</p> <p>Q3 Japan proposes the following new wording: "Will the control measures at subsequent step will prevent or eliminate the identified hazard, or reduce it to the acceptable level?"</p> <p>Rationale: In order to follow the phrase used in the Section 2 of the GPFH (e..g Section 3.6).</p> <p>Q4 Japan proposes to amend Q4.</p> <p>The sentence "prevent, reduce or eliminate the hazard to an acceptable level" should replace with "prevent or eliminate the identification hazard or reduce it to an acceptable level" because of the following reasons</p> <p>In CXC1-1969, the term "prevent or eliminate a hazard or reduce it to an acceptable level" is used.</p> <p>Can the control measures at this step will prevent or eliminate the hazard or reduce it to the acceptable level ?</p>	<p><b>Japan</b></p>
<p>Malaysia agrees with Annex 1 – Example of a CCP Decision Tree (Apply to each Step for a Specified Hazard) to be included in the General Principles for Food Hygiene (CXC 1-1969) as sequence of questions are arranged in a step-wise approach and this provide clearer guidance to the user.</p>	<p><b>Malaysia</b></p>
<p>New Zealand notes that improvements have been made to the decision tree to improve the flow of information and format of the questions. New Zealand supports the use of the term "prerequisite programmes" in place of GHP, as this term, as defined in the 2020 version of the text, refers to more than GHP, GAP, etc to cover training, traceability and other programmes that provide the basis for implementing a HACCP system.</p>	<p><b>New Zealand</b></p>
<p>Specific, New Q1</p> <p>New Q1: Can the significant hazard be controlled at this step by prerequisite programmes including GHPs?      Align with the main document CXC-1-1969 2020 version as how are prerequisite programmes and GHPs are phrased. Addition of "significant" before "hazard" provides clarity.</p> <p>Specific, New Q1 *</p> <p>Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by prerequisite programs including GHPs. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording). This emphasizes the text on the main document CXC 1-1969 version 2020, first paragraph, Section 2, page 24</p> <p>Specific, New Q2</p> <p>Do control measures for identified significant hazard exist at this step?</p>	<p><b>Philippines</b></p>

<p>Addition of “for identified significant hazard” provides clarity</p> <p>Specific, Q3</p> <p>Will a subsequent step eliminate the identified significant hazard or reduce its likely occurrence to an acceptable level?</p> <p>Adding the “significant” before “hazard” provides clarity and continuity from Question 2.</p> <p>Specific, New Q4</p> <p>Can this step prevent, reduce or eliminate the significant hazard or reduce its likely occurrence to an acceptable level?*</p> <p>Adding the “significant” before “hazard” will provide clarity and continuity from Question 2 and Question 3.</p> <p>Specific, Question 6, Paragraph 15</p> <p>Agree on the proposal that the questions are sufficient to categorize the control measure if it’s a CCP or not.</p>	
<p>We tend to agree more with the “Example of a CCP Decision Tree” with some modifications as provided.</p> <p>Rationale: FBOs are more familiar with this type of tool compared to the Determination worksheet. Also, the Decision tree has been used in the CXC 1 – 1969 since 2003.</p> <p>However, if the CCFH sees fit, both Decision Tree and determination worksheet can be added to the text, provided that the same detail of the questions and sequences are used.</p> <p>Q4 should come before Q3. If answer 'yes' to the question 'Can this step prevent, reduce or eliminate the hazard to an acceptable level?', the next box should be 'This step is a Critical Control Point (CCP)'. If the answer is 'no', the question 'Will a subsequent step eliminate the identified hazard or reduce its likely occurrence to an acceptable level?' is then asked. With answer 'yes' at this question, it will lead to the box 'This step is not a CCP. A subsequent step should be a CCP'. With answer 'no', it will lead to the box 'Modify the step, process or product to implement a control measure'.</p> <p>Rationale for the modification: We still think that the sequence used in the CXC 1 – 1969 revised 2003 is better understood by FBOs without major difficulty. Also, the measure at present step should be considered first, and followed by the control measure that might be present at the subsequent step. This sequence will help the FBOs to be more cautious about the significant hazard control measures and possible CCP at the current step. For example, the delay time, which may affect the initial load of low acid canned food, should also be controlled even though there is a sterilization at later step.</p> <p>Proposal to add footnote *** stating that "The hazard without control measure at this step should be considered again at the subsequent step." in the box 'This step is not a CCP. A subsequent step should be a CCP.' after answering 'no' to Q2</p> <p>Rationale for the modification: Footnote *** is to remind the users of the Decision tree that even though there is no control measure for the hazard at this step, the hazard should be considered again at the subsequent step until it is prevented, reduced or eliminated to an acceptable level.</p> <p>Proposal to add footnote **** stating that "This step should be modified to implement a control measure so that it can prevent, reduce or eliminate the identified hazard to an acceptable level and this step becomes a CCP." in the box 'Modify the step, process or product to implement a control measure' after answering 'no' to Q3 which is now become Q4 according to our comment</p> <p>Rationale for the modification: Footnote **** is to clarify and ensure that after modification, this step will eliminate the identified hazard or reduce its likely occurrence to an acceptable level and becomes a CCP.</p>	<p><b>Thailand</b></p>

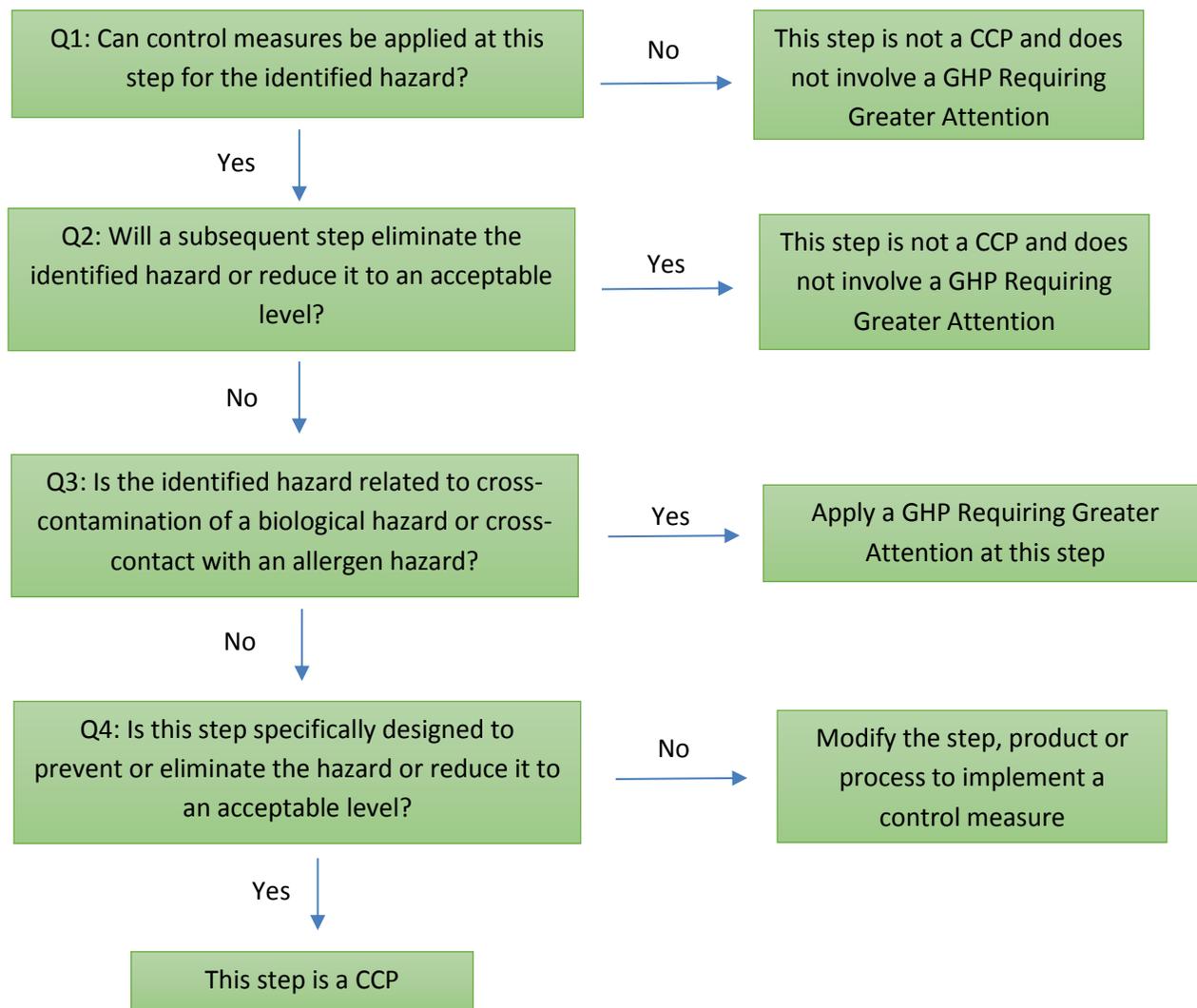
<p>1) In Annex 1, Question 4: Can this step prevent, reduce or eliminate the hazard to an acceptable level? If the answer is “No,” we recommend including the following footnote: “You must return to the start of the decision tree.”                  Rationale: When modifying the step, the process, or the product to implement a control measure, we must ensure hazards are controlled.</p>	<p><b>Uruguay</b></p>
<p><b>Annex 1 - “Example of a CCP Decision Tree (Apply to each Step <del>for</del> <u>Where a Specified Hazard</u> <u>Significant Hazard is identified</u>).”</b></p> <p>With respect to the proposed CCP decision tree, we suggest the following changes. (They were presented in all capital letters on the Online Commenting System (OCS)).</p> <p>Modify the title as follows: Example of a CCP Decision Tree (Apply to each Step <u>where</u> a Specified <u>Significant</u> Hazard <u>is identified</u>).</p> <p>Rationale: To avoid suggesting that each hazard must be evaluated at each step of the process and to reinforce that the decision tree applies to hazards that were determined through the hazard analysis to be significant, as indicated in section 3.7 (“Critical Control points are to be determined only for hazards identified as significant as of the result of a hazard analysis.”). The decision tree might be used without reading the text in the GPFH, so this insertion could be helpful.</p> <p>If Q1 is retained, modify it as follows:</p> <p>“Can the hazard be <u>sufficiently</u> controlled at this step by prerequisite programs (e.g. GHPs)?*” or, alternatively “Can the hazard be controlled <u>to an acceptable level</u> at this step by prerequisite programs (e.g. GHPs)?*”</p> <p>Rationale: Some U.S. stakeholders have expressed concern that there is the potential for FBOs to simply say a hazard is addressed by GHPs (or prerequisite programs), and thus needed CCPs would not be identified from amongst the multitude of GHPs.</p> <p>If the footnote is retained on Q1, modify it as follows:</p> <p>* Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by <u>prerequisite programs such as</u> GHPs. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording).</p> <p>Rationale: Better alignment with the phrasing of Q1.</p> <p><b>Potential additional decision tree:</b></p>	<p><b>USA</b></p>

Title: Example of a CCP Decision Tree



**Potential additional decision tree:**

Example of a Decision Tree for Determining if Process Steps with Identified Hazards Involve CCPs or GHPs Requiring Greater Attention



Re: Question 2:

The question will be answered by Question 4, which reflects the definition of a control measure. Question 2 is therefore redundant.

Re: Question 3:

**IDF/FIL**

<p>The wording “a subsequent step” must be replaced with “another step” to align with the paragraph 161 of the GPFH. This comment applies also to the “answer” box.</p> <p>The GPFH no longer requires that a CCP shall be the last effective step – a CCP can well be located at any process step, including upstream the process flow.</p> <p>The relevant wording on location of CCPs can be found in para. 161 of the revised GPFH, which reads:</p> <p>“If the control measure can be used at the step being analysed, but can also be used later in the process, or there is another control measure for the hazard at another step, the step being analysed should not be considered as a CCP.”</p>	
ANNEX 2	
<p>The EUMS would like to express their concern that the “Example of a CCP determination worksheet” (Annex 2) may result in the identification of a lot (disproportionally high number) of CCP by the application of a two step (GHP-CCP) approach.</p>	<b>European Union</b>
<p>Answer to New Q. 1: Yes, it can be controlled by the prerequisite programs.</p> <p>Answer to New Q. 2: Yes, control measures exist at this step.</p> <p>Answer to New Q. 3: It can only reduce it.</p> <p>Answer to New Q. 4: It can only reduce it.</p>	<b>Iran</b>
<p>Japan proposes to conform question numbers to decision tree. Since this unconformity could cause confusions for readers of this document.</p>	<b>Japan</b>
<p>In relation to Annex 2 “Example of a CCP determination worksheet (Apply to each Step for a Specified Hazard),” we believe Q2 is not consistent with the decision tree in Annex 1. By the same token, it does not include Q4, and the yes/no answers do not match the flow of the chart in Annex 1. We suggest changing it to include Q4.</p>	<b>Peru</b>
<p>Additional column for the question “Do control measures exist at this step?”</p> <p>Proposal for additional column bearing the Q2 from Decision Tree “Do control Measure exist at this step” in the Annex 2 for consistency of the two annexes.</p>	<b>Philippines</b>
<p>In Annex 2, Question 2: Is this step specifically designed to prevent or eliminate the hazard or reduce it to an acceptable level? We propose the following wording: Does this step prevent or reduce the hazard to an acceptable level?</p> <p>Rationale: Some process steps were not designed specifically to control the hazard; instead, they are part of the production process.</p>	<b>Uruguay</b>

Annex 2 - "Example of a CCP determination worksheet (Apply to each Step for a Specified Significant Hazard)."

With respect to the Example of a CCP determination worksheet, the table format is nice in that it lists the hazard being addressed at the process step. The United States recommends the following change to this CCP determination worksheet:

Similar to our comments for the Decision Tree, we recommend revising the title to add the term "significant": Example of a CCP Determination Worksheet (Apply to each Step for a Specified **Significant** Hazard)

Rationale: To reinforce that the CCP determination worksheet applies to hazards that were determined through the hazard analysis to be significant. (Although this change is less important here because column 2 is headed "Significant hazard," if the change is made to add "Significant" in the title for the Decision Tree it would be good for consistency to do the same here.)

In the last column: ("Number the CCP and include in HACCP worksheet") we recommend revision as follows: **If there is a CCP at this step,** number the CCP and include in **the** HACCP worksheet.

USA