

30 August 2018

Dear Interested Party

CODEX COMMITTEE ON FOOD HYGIENE – PROPOSED REVISIONS

The Codex Committee on Food Hygiene (CCFH) have published the Draft Revision of the General Principles of Food Hygiene and its HACCP Annex and the proposed draft Guidance for the Management of Microbiological Foodborne Crises/Outbreaks. These will be discussed at the 50th session of CCFH in November.

Food Standards Scotland (FSS) is seeking views from Scottish stakeholders to help develop a UK response to the Draft Revision. I would greatly appreciate your feedback please by close of play on **Friday 21 September**. Parallel letters are being issued by the Food Standards Agency (FSA) to stakeholders in England, Wales and Northern Ireland. Please note that comments from the UK will be fed into the formal EU response to these draft documents.

Proposed Draft Revision of the General Principles of Food Hygiene and its HACCP Annex

The UK have been leading the development of this piece of work alongside France, Ghana, India, Mexico and the United States as Co-Chairs. The document can be accessed at the following weblink:

http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-712-50%252FWD%252Ffh50_05e.pdf

Comments are sought specifically on the nine areas listed below, which are contained within the document – the relevant page numbers and/or paragraph numbers are provided for ease of reference. Any wider comments on other aspects of the document are also welcome.

GENERAL PRINCIPLES OF FOOD HYGIENE: GHPs AND THE HACCP SYSTEM

Comparison of GHPs and HACCP Controls – PLEASE REFER TO PAGE 5

Q1: Views are requested on whether this table is useful or if it should be deleted.

PRIMARY PRODUCTION

Hygienic Production of Food Sources – PLEASE REFER TO PAGE 11, PARAGRAPH 27

Q2: Are there any FAO/WHO programmes which can be referenced here?

FACILITIES

Water supply - PLEASE REFER TO PAGE 13

Q3: Original text from CXC 1–1969 has been moved to the section on water. Is there agreement that this text fits here?

Temperature control - PLEASE REFER TO PAGE 14, PARAGRAPH 43

Q4: Do we need a paragraph to discuss monitoring of temperature of premises, equipment and food?

WATER - PLEASE REFER TO PAGE 18, ABOVE PARAGRAPH 75

Note: The original text from CXC 1–1969 in paras 51 to 58 have been amended but should be further developed taking account of information from FAO/WHO consideration of water e.g. reference could be made to FAO/WHO guidance as far as possible and basic information provided here with references to specific commodity codes. Note the Co-Chairs understand that the definition of water is currently under revision by WHO. Q: Is 'potable' water better understood by most people as this seems to be the term used in the regulations of several countries, or is there a more appropriate term?

SECTION 3: ESTABLISHMENT [CLEANLINESS] [SANITATION], MAINTENANCE AND PEST CONTROL - PLEASE REFER TO PAGE 19, BELOW PARAGRAPH 85

Q5: Further discussion is required to determine whether the word 'Sanitation' should be used or whether it should be defined as there may be an issue when this term is translated. As a suggestion, the word 'Cleanliness' has been used in the title – is this acceptable? If it is, it can be used within the text.

HACCP SYSTEM AND GUIDELINES FOR ITS APPLICATION- PLEASE REFER TO PAGE 26, BELOW PARAGRAPH 135

Q6: Validation has been added to Principle 6 on verification because the application text for Principle 6 included a statement on validation. However, it may be more appropriate to include 'Validation' under Principle 3. What do members think?

DETERMINE CRITICAL CONTROL POINTS (STEP 7 AND PRINCIPLE 3) - PLEASE REFER TO PAGE 30, ABOVE PARAGRAPH 159

Q7: Re: the decision tree at Diagram 2 provided by Brazil and amended by UK - are members content with this inclusion?

Establish validation and verification procedures (Step 11 and Principle 6) - PLEASE REFER TO PAGE 31, ABOVE PARAGRAPH 170

Q8: This section has been retitled and includes additional text – are members content with the amendments?

Proposed Draft Guidance for the Management of Microbiological Foodborne Crises/Outbreaks This work has been led by Denmark, the EU and Chile. Comments are invited on the document which can be accessed at the following weblink:

http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-712-50%252FWD%252Ffh50_08e.pdf

Your feedback, by **Friday 21 September**, would be greatly welcome. Many thanks for your help with this matter.

Yours sincerely

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