



Report of the U.S. Delegate, 48th Session, Codex Committee on Food Hygiene

November 4-11, 2016

Los Angeles, California, USA

The 48th Session of the Codex Committee on Food Hygiene (CCFH48), chaired by Dr. Emilio Esteban, USDA Food Safety and Inspection Service, was attended by participants from 48 member countries, one member organization (the European Union (EU)), and 11 international intergovernmental and non-governmental organizations, including WHO and FAO. The United States was represented by the Delegate, Ms. Jenny Scott, FDA Center for Food Safety and Applied Nutrition; Co-Alternate Delegates Dr. Dan Engeljohn, USDA Food Safety and Inspection Service, and Dr. Andrew Yeung, FDA Center for Food Safety and Applied Nutrition; six government advisors; and six non-government advisors

The session was opened by Ms. Mary Frances Lowe, the US Codex Manager, USDA; who introduced the keynote speaker, Dr. Christine Bruhn, Consumer Education Specialist Emerita from the University of California, Davis. Dr. Bruhn's presentation was on "Safe Food for Consumers" – a reminder of the ultimate goal of CCFH documents.

This year's meeting took on a different format from previous years, since last year three documents had been forwarded to the Codex Alimentarius Commission for final adoption at the Commission's June 2016 session. This left the Committee with limited agenda items: the revision of the *General Principles of Food Hygiene*, at an early stage; the revision of the *Codex Code of Hygienic Practice on Fresh Fruits and Vegetables*, at a late stage; and the new work on histamine directed to CCFH by the Codex Alimentarius Commission (CAC) in June. The United States' objectives for the meeting were met or exceeded, and groundwork was laid for successful progression of two ongoing work projects as well as future work on Shiga toxinogenic *E coli* (STEC).

HIGHLIGHTS

The 48th Session of CCFH:

- Completed work on the revision of the *Code of Hygienic Practice for Fresh Fruits and Vegetables* and forwarded the document for final adoption by the 40th Session of the CAC in July 2017 (CAC40).
 - Agreed to establish an electronic working group (EWG), led by the United Kingdom, France, Ghana, India, Mexico, and the United States, to continue updating the *General Principles of Food Hygiene* and its HACCP annex for consideration by the 49th session of CCFH in November 2017.
 - Agreed to establish an EWG, led by the United States and Japan, to revise histamine control guidance for the *Code of Practice for Fish and Fishery Products* in accordance with terms of reference specified in the final report of CCFH48.
 - Identified the United States and Uruguay as co-leads for development of a discussion paper on STEC, once FAO and WHO complete their work to develop scientific advice to inform the work.
- The 48th Session of CCFH continued the successful approach of [CCFH47](#) (2015) in holding several "Side Events," including a session on HACCP: Past, Present and Future, a session on histamine, and a session on use of the Codex online forum for conducting the work of electronic working groups. All these sessions were very well attended.

The side event on HACCP, organized and facilitated by the United States, provided a brief history of HACCP, including HACCP in Codex and FAO's involvement in support of implementation of HACCP. These presentations were followed by a presentation on the HACCP issues identified as needing revision or further guidance by a colloquium held by Finland in 2014 and issues identified by the first EWG related to revising the HACCP guidance. Presentations on HACCP in developing countries and on implementation /use of HACCP by industry provided information useful to the Committee in moving forward in updating the *General Principles of Food Hygiene* and HACCP. The session concluded with a presentation on the EWG charge and accomplishments to date.

The side event on histamine, also organized and facilitated by the United States, provided background on prior work in CCFH related to histamine, the work on histamine by the Codex Committee on Fish and Fishery Products (CCFFP), the adjournment of CCFFP, and the assignment of histamine work to CCFH by CAC.



A summary of the meeting of the 48th Session of CCFH is given below. The full report of the session can be found on the Codex Website, www.codexalimentarius.org, under "Meetings and Reports."

MEETING SUMMARY

PROPOSED DRAFT REVISION OF THE *GENERAL PRINCIPLES OF FOOD HYGIENE (CAC/RCP 1-1969)* AND ITS HACCP ANNEX

[CCFH47](#) (2015) established an electronic working group, chaired by France and co-chaired by Chile, Ghana, India and the United States of America, working in English, Spanish and French, to prepare a draft revision of the *General Principles of Food Hygiene* (GPFH) and its HACCP annex. France gave the report of the EWG, noting that the work has great interest: 44 members and observers had participated in the EWG and a large number of comments had been received on the document provided for consideration at CCFH48. That document only included the introductory section of the revised GPFH, intended to show the relationship of Good Hygienic Practices (GHPs) and HACCP, each of which would be further elaborated in other sections of the document.

Delegations supported the three-part structure of the document. Some delegations expressed concern about the introduction, indicating it needed clarification. There was discussion about the categories of control measures (GHPs, Critical Control Points/CCPs and control measures that are essential but not applied at CCPs). Some delegations urged the use of terminology developed by the International Organization for Standardization (ISO). Some delegations emphasized that GHPs alone may be adequate in some food businesses.

In order to move the document forward, an in-session physical working group (PWG), chaired by the United States, was held. The PWG participants (which appeared to consist of most of the plenary) agreed to the general structure of the document, and noted that the introduction as currently written did not clearly describe the link between GHPs and HACCP. The text in the introduction was modified to specify that GHPs lay the foundation for producing safe and suitable food. In those circumstances where specific control of hazards is required, HACCP should be implemented. The document further notes that GHPs should always be implemented in any operating food business, and that all employees should be trained in GHPs as appropriate to their job activities; it is important that food handlers have basic knowledge of the impact GHPs can have on the safety and suitability of food. The document states that GHPs can be stand-alone food hygiene measures or programs prerequisite to HACCP. The document notes that HACCP application will not be effective without prior implementation of GHPs. HACCP is a systematic approach that aims to ensure food safety by improving the control of hazards, where necessary, over that achieved by the GHPs that have been applied by the establishment. The PWG agreed that HACCP may not be applicable to all types of food businesses, in particular at the stages of primary production.

The PWG discussed the issue of control measures applied at CCPs, as currently defined, and those that are challenging with respect to monitoring at CCPs (e.g., critical limits and/or timeliness of monitoring are not available). There was general agreement as to the existence of two types of control measures essential for food safety. However, the second type of control measure is addressed differently by countries. For instance, some consider them as enhanced GHPs while others address them as OPRPs (as defined in ISO 22000). The issue of applying HACCP throughout the food chain, especially at primary production, was discussed. The PWG agreed that examples of control measures applied at various points in the food chain, as well as a comparison table between GHP, CCP and other types of control measures, would be helpful as the document moves forward. In addition, several delegations stressed the importance of including management commitment, responsibility, and food safety culture in the document.

The Committee agreed to continue work on the revision of the *General Principles of Food Hygiene* and its HACCP annex and to establish an EWG, chaired by the United Kingdom and co-chaired by France, Ghana, India, Mexico, and the United States of America, working in English, Spanish and French, to prepare the proposed draft revision of the GPFH for circulation for comments and consideration at CCFH49. The Committee agreed to continue the revision of the introductory section, to develop the sections on GHPs and on HACCP in parallel, and to consider the use of examples and a comparison table of control measures to help provide a better understanding of the issues. The Committee further agreed to consider convening a physical working group in conjunction with CCFH49 to prepare a revised proposal on the basis of the comments submitted.

The Delegation of Canada indicated that it had obtained tentative approval to host a PWG in English, French and Spanish next spring in Ottawa. The Secretariat expressed concern for such a PWG because of issues related to travel by developing countries, which would limit their input. A side discussion resulted in a decision that Canada would consider hosting a meeting of the co-chairs that would be open to other delegations as well.



PROPOSED DRAFT REVISION OF THE *CODE OF HYGIENIC PRACTICE FOR FRESH FRUITS AND VEGETABLES*(CAC/RCP 53-2003)

Under the leadership of Brazil, with the assistance of France, the *Code of Hygienic Practice for Fresh Fruits and Vegetables* has been undergoing reorganization to remove redundancies and to move certain provisions that are broadly applicable from the annexes to the main code. Many comments were received on the document, including a couple of issues that looked to be contentious. Because many of the comments were for substantive changes, it appeared likely that the document would only progress to Step 5, which would require another round of review by the next session of CCFH. Brazil and France prepared a Conference Room Document (CRD) in which proposed changes were made with tracking for review by the Committee. In introducing the agenda item, Brazil indicated that the EWG recommended deferring any changes related to suitable water quality pending the advice of FAO/WHO. Brazil also noted that there was no support for developing annexes for carrots or for tomatoes.

One of the issues of concern for the United States was the insertion of a statement indicating that some requirements may not be applicable to fresh fruits with very low risk due to lack of outbreaks, i.e., fruits from tall trees with inedible peels (e.g., durian, mangosteen, coconut, rambutan). However, a U.S.-suggested revision to add text to a statement on flexibility in application of the provisions of the code with respect to conditions and practices associated with growing these types of fruits presenting a lower likelihood of contamination at primary production (compared to fruits such as melons and berries grown on or near the ground) was accepted instead of the sentence of concern. Another major concern of the United States was the EU proposal to eliminate the provision for seed decontamination. The EU language that was inserted into the CRD indicated that decontamination of seeds "might be considered." The United States expressed concern that this significantly weakened a provision that we feel is very important in reducing the risk of foodborne illness. Delegations such as Canada agreed with the United States. Ultimately the Committee reached a compromise in stating that "decontamination of seeds prior to the sprouting process is recommended where appropriate to reduce the risk of foodborne illness."

Another issue arose during the meeting with respect to the definition of "antimicrobial agent," because there is a definition in the *Guidelines for Risk Analysis of Foodborne Antimicrobial Resistance* that is not appropriate in the context of this Code of Hygienic Practice and Codex does not want to have different definitions in different documents. The United States worked with the EU on an alternative term; the Committee agreed to use "biocides" and provided a definition for the term in the document.

Since the Committee was able to consider all the suggested changes, and there were no major shifts of text to other sections, the Committee determined that all outstanding issues had been adequately addressed and agreed to forward the revised *Code of Hygienic Practice for Fresh Fruits and Vegetables* to CAC40 for final adoption at Step 5/8.

PROPOSED DRAFT GUIDANCE ON HISTAMINE CONTROL AND SAMPLING PLANS FOR HISTAMINE

Japan, as co-chair with the U.S., introduced this agenda item for discussion of four points: (1) the approach to revision of the *Code of Practice for Fish and Fishery Products* (CAC/RCP 52-2003), (2) the inclusion of Table 2.3 from the report of the *Joint Expert Meeting on the Public Health Risks of Histamine and Other Biogenic Amines from Fish and Fishery Products*, (3) starting work with histamine control guidance, followed by work on sampling plans, and (4) establishing an EWG to continue the work.

The Committee agreed to the EWG recommendation to develop guidance on histamine control and decide later on the final format in CAC/RCP 52-2003, e.g., as a separate annex or integrated within the Code. With regard to Table 2.3, FAO pointed out that the table had been developed to provide comprehensive information as part of the hazard identification step for risk assessment. The Committee agreed that all the information in Table 2.3 was not needed for the guidance on histamine control; however, there was disagreement on the exclusion of certain information, e.g., common market names of species associated with scombrototoxin fish poisoning (SFP). The Committee agreed that annual production level of fish species was not relevant and it was not necessary to include histidine levels, as this could be misinterpreted. The Committee also agreed that the table would list species associated with histamine formation using only the scientific name and link to Table 2.3 of the Joint FAO/WHO Joint Expert Meeting report. The most contentious issue was whether to include Salmonidae in the table. FAO noted that Salmonidae were included because of reported SFP-like illness, but data were limited (with no reports in the last 20 years) and levels of histamine in implicated salmon were low. Moreover, a recent review of rejections of salmon traded internationally did not identify any rejections related to histamine. Most delegations supported excluding Salmonidae from the table for these reasons. However, a few delegations favored including Salmonidae because of the association with an incident of SFP-like illness; the Delegation of Morocco cited the "precautionary principle" in their justification. The



Committee in general felt that Salmonidae did not warrant specific risk management guidance for histamine. However, as a compromise, the Committee requested that FAO/WHO conduct a literature review on histamine-related illness in Salmonidae for consideration by the working group as to whether to include Salmonidae in the list of susceptible species.

The Committee agreed to establish an EWG, led by Japan and the United States, to revise histamine control guidance for the *Code of Practice for Fish and Fishery Products* (CAC/RCP 52-2003), ensuring that the guidance covers the entire food chain (harvesting, storage, handling, processing, and distribution). The United States will work with Japan to prepare a draft for consideration by the EWG.

OTHER MATTERS

Revision of the *General Standard for the Labeling of Prepackaged Food* (CODEX STAN 1-1985): Date Marking

CCFH48 was asked by the Codex Committee on Food Labeling (CCFL) to provide advice on a criterion in a provision to exempt foods from date marking because of the preservative nature of the food and/or storage conditions. The EU wanted to delete storage conditions and Thailand considered that for low-moisture foods storage condition is an important factor. Based on text provided by the United States, CCFH agreed to recommend that the criterion be revised to read "Where safety is not compromised and quality does not deteriorate because the preservative nature of the food is such that it cannot support microbial growth (e.g., alcohol, salt, acidity, low water activity) under stated storage conditions," because it was felt that safety and quality depended on both the preservative and storage conditions.

Proposed Draft *Regional Code of Hygienic Practice for Street-Vended Foods in Asia*

CCFH48 endorsed this draft code. However, several changes were recommended for CAC40 to consider, including providing more flexibility with respect to using disposable gloves (since the use of gloves was not applicable in all situations), adding a caution about preventing cross-contamination when washing raw meat and poultry (since it was not considered practical to recommend that this practice be avoided), and indicating that frozen foods should be thawed only once and used for food preparation immediately after thawing (to minimize bacterial growth).

Shiga toxicogenic *E. coli* (STEC)

FAO provided a report on the expert meeting held in Geneva, Switzerland in July 2016. The meeting recommended that the term "STEC" be used to identify the hazard, rather than verotoxigenic *E. coli* (VTEC). FAO/WHO are working to develop scientific advice in four areas, in accordance with the request from [CCFH47](#): (1) the global burden of disease, (2) source attribution to food categories based on outbreak data, (3) criteria to support a harmonized approach to hazard identification and characterization, and (4) an overview of monitoring and assurance programs, including a review of the currently available methodology. Fewer than ten countries provided data on monitoring programs (the United States provided data). FAO/WHO will host another session of the Joint Expert Meeting on Microbiological Risk Assessment (JEMRA) this coming summer to address attribution.

The Committee has ranked work on STEC as one of the highest priorities. The FAO/WHO work was undertaken at the request of [CCFH47](#) in preparation for future work in the area. In light of Uruguay's expressing interest in this work in the past (but indicating that they were unable to lead the work), the U.S. asked Uruguay if they would be willing to co-lead with another country. The United States co-alternate delegate from FSIS determined that the United States could co-lead this work, and Uruguay determined that they could co-lead, but would be limited in resources, e.g., for translation or hosting physical working groups. Based on this, the United States expressed its intent to co-lead, with Uruguay, the development of a discussion paper on CCFH work on STEC following CCFH49, since the information from the FAO/WHO joint meeting that would be provided at CCFH49 was important for determining the scope of the work to be proposed. The United States noted the importance of having the representatives from the United States and Uruguay who would lead the work attend the forthcoming JEMRA meeting to listen to the discussions. CCFH48 agreed to this approach.

Water Quality

The issue of "clean water" versus "potable water" has come up for several Codex documents, especially with respect to defining "clean water" and determining when it is acceptable to use clean water and when it is necessary to use



potable water. [CCFH47](#) had requested that FAO/WHO review the existing FAO and WHO guidelines and related texts on water and water quality to determine whether they cover all aspects of water use relevant to food production and processing (including water used in primary production and use of recycled and waste water, water in contact with food or used as an ingredient, and water used in enclosed systems in food operations (e.g., heating, cooling)). FAO/WHO indicated that there is a gap in the existing documents on managing water safety with respect to food safety management. This information is important for the revision of the GPFH. CCFH48 requested that FAO/WHO provide guidance for scenarios where the use of clean water was indicated in Codex texts, in particular irrigation water, clean seawater and the safe reuse of processing water.

Proposal to Merge all Guidance for Control of Foodborne Parasites

At the request of [CCFH47](#), the Secretariat had prepared a proposal for merging the three documents on control of parasites (i.e., *Guidelines on Control of Trichinella spp. in Meat of Suidae* (CAC/GL 86-2015), *Guidelines on Control of Taenia saginata in Meat of Domestic Cattle* (CAC/GL 85-2014) and *Guidelines on the Application of General Principles of Food Hygiene to the Control of Foodborne Parasites* (CAC/GL 88-2016)) into a single document. However, the Secretariat noted that while it was possible to format CAC/GL 85-2014 and CAC/GL 86-2015 as annexes to CAC/GL 88-2016, the intent and format were different for these documents, and including CAC/GL 85-2014 and CAC/GL 86-2015 as annexes would give the impression that *Taenia saginata* and *Trichinella* spp. have a high level of risk, contrary to the ranking by FAO/WHO. As a result, CCFH48 agreed to keep the documents separate.

New Work/Forward Workplan

The Forward Workplan was adjusted to remove from the workplan work on the development of annexes on tomatoes and carrots for the *Code of Hygienic Practice for Fresh Fruits and Vegetables*, based on the recommendations of the EWG on the revision of the Code, as well as work on the *Code of Hygienic Practice for Processing of Frog Legs* (CAC/RCP 30-1983), due to lack of interest. The work on verotoxigenic *E. coli*/Shiga-toxigenic *E. coli* in beef was revised to refer only to control of Shiga-toxin producing *E. coli* based on the report of the FAO/WHO Expert meeting and the pending work on attribution.

CCFH48 was informed that there was no new information to justify new work on the revision of the *Code of Hygienic Practice for Meat* (the other top-ranked work in the Forward Workplan) and the Forward Workplan was adjusted to reflect this. In doing so, the Committee noted the difficulty in adjusting the rankings to reflect a lower prioritization based on this change and requested the United States to prepare a proposal for CCFH49 on revision of the approach to prioritization.

The Committee agreed to re-establish the working group on CCFH Work Priorities, which will meet in conjunction with CCFH49 and will be chaired by the U.S.

NEXT SESSION OF CCFH

The 49th Session of CCFH is tentatively scheduled for November 13-17, 2017 in Chicago, IL.