



المبادرة العربية  
للدستور الغذائي

**ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR  
THE 54<sup>TH</sup> SESSION OF THE CODEX COMMITTEE ON  
FOOD HYGIENE**



## **AGENDA ITEM 9:**

**ALIGNMENT OF CODEX TEXTS DEVELOPED BY  
CCFH WITH THE REVISED GENERAL PRINCIPLES OF  
FOOD HYGIENE (CXC 1-1969)  
(CX/FH 24/54/10)**

*Presented by: Eng. Nessma Shannak, Hashemite Kingdom of Jordan*

# BACKGROUND

- CAC45 adopted the latest (extensive) revision of the General Principles of Food Hygiene (CXC 1-1969).
- **CAC45 requested that** CCFH undertake work on the alignment of all food hygiene texts with this latest version – as they no longer follow the same format as, or cross-reference correctly to CXC 1-1969.
- The United Kingdom agreed to provide options for the approach for the alignment, with the purpose of creating consistency among texts and not to alter the standards.

# Four Categories of CCFH Texts:

- **8** Texts which do not require alignment due to their specific nature,
- **6** Texts that are **part of the forward work plan and are either undergoing or expected to undergo revisions** through an EWG, e.g., *Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic Vibrio Species in Seafood (CXG 73-2010)*.
- **18** Texts **not currently part of the forward work plan for revision** e.g., Code of Hygienic Practice for Low-Moisture Foods
- **New texts that are currently being drafted** e.g. , “Food Hygiene Control Measures in Traditional Food Markets”.

# Three (3) Proposed Alignment Options

- **Option 1:** Simple alignment. Existing documents are revised with **updated references** to the correct sections of CXC 1-1969,
- **Option 2:** Full structural alignment. **Option 1 plus structural alignment** to CXC 1-1969.
- **Option 3:** Full structural and technical alignment with CXC 1-1969. **Option 2 plus review of definitions and their impact on the document**, review of sections to propose areas where texts can be streamlined to refer to CXC 1-1969, but no technical changes based on updated science and evidence.

# CCFH was Asked to Recommend One Option to Carry Out Alignment

- Given the foundational nature of CXC 1-1969, and the extensive revisions its latest version reflects, **it is important to fully support the alignment of existing CCFH texts to this updated version**
- It is recommended to create a dedicated working group to carryout the alignment exercise
- **It is recommended that Option 2 (Full structural alignment) be pursued for this exercise.**

It will be possible to add a note in each document that results from this process that **indicating that “the document’s references and structure have been aligned to CXC 1-1969, but it has not undergone a technical update.”**

# 10 Questions were Developed by the UK on How the Alignment Would be Carried Out

- In General, our proposed answers correspond to the same approach that we recommended : meaning to follow Option 2: Full Structural Alignment as the approach to be followed:
  - We are **recommending that cross-reference be followed**: adding cross references to the relevant sections of CXC 1-1969 for each missing area in the reviewed document.



# ANNEX

## **PROPOSED ANSWERS TO THE 10 QUESTIONS ON OPTIONS OF ALIGNMENT**

*Presented by: Eng. Nessma Shannak, Hashemite Kingdom of Jordan*



## Questions 1 – 4

1.Question 1: If the text being aligned does not include some sections of the new structure adopted by CXC1-1969 should we:

Option a: make a simple cross-reference to the section

Option b: develop new text or new wording to align with the new structure

**Option “a” (simple cross reference to CXC 1-1969) is considered sufficient.**

**2.Question 2:** For section 7 of the Code related to Introduction and Control of food hazards, should we make a general reference to the Section, where it is missing from the text or be explicit with relevant development of measures

**A simple cross-reference to Section 7 of CXC 1-1969 is considered sufficient, given that we suggest applying alignment Option 2. Further modifications would fall under a technical revision of the document.**

**3.Question 3:** Should we elaborate “objectives” and “ rationale” in the texts to be aligned or simple cross reference is sufficient

**A simple cross-reference to CXC 1-1969 is considered sufficient, given that we suggest applying alignment Option 2. Further modifications would fall under a technical revision of the document.**

**4.Question 4:** If there is no reference in the text to be aligned to Section 12.1 on Personnel, illnesses and transmission possibilities through food, should we review the text to ascertain whether such information is included with precision – or simply cross reference.

**We suggest maintaining any existing text along with the new cross-reference to Section 12.1 of CXC 1-1969. Further modifications or exclusions would fall under a technical revision of the document.**

## Questions 5 – 8

**5.Question 5:** for some texts like 73-2010, should we have specific sections related to the Establishment and associated measures with specific sub-headings or have a generic and single cross reference

**A single cross-reference to CXC 1-1969 is considered sufficient, without listing out each sub-heading**

**6.Question 6:** Should the alignment being considered also include alignment with Alignment with CXG 100-2023 related to “Guidelines Safe Use and Re-use of Water in Food Production and Processing”

**Alignment with CXG 100-2023 is also important and relevant, however this guideline impacts more than CCFH standards – Alignment with CXG100-2023 should be part of a different task, as other documents (not CCFH only) may also be affected.**

**7.Question 7:** This question related to the implementation of Option 3 of the alignment and the proposal of a skeleton of the aligned text, where it is possible to have a blank template developed with either only headings (option 1) or headings and sub-headings (option 2)

**The blank template should consist of main headings and sub-headings (Option 2). This option is more precise and in line with the more comprehensive alignment under Alignment Option 3 (structural alignment + content alignment)**

**8.Question 8:** Should the alignment process replace text with updated text from the CXC 1-1969 or should it be streamlined to include only references to relevant the section of the CXC 1-1969.

**The alignment process should not replace text, as this should be part of a technical review. Only the addition of references to the relevant section of CXC 1-1969 should be considered.**

## Questions 9 – 10

**9.Question 9:** For texts being updated as part of a forward plan – should the alignment work with CXC1-1969 be carried out as part of the same task i.e., by the same EWG or be carried out separately, after the technical review is completed.

**For text that are being revised or are included in the CCFH forward work plan, It is preferred that work on alignment be carried out within the same existing EWG (Option 2).**

The other option (Option 1) can also be justified, to ensure consistency in the alignment process (i.e., carried by the same EWG tasked with alignment only)

**10. Question 10:** For the 18 CCFH texts that are not part of the forward plan for CCFH review, what should be the criteria for prioritization of alignment ? Length, age of the text etc..

**18 texts, in 6 languages each, are currently not captured in the forward plan. We suggest these texts be prioritized, in a preliminary phase, based on the importance of the commodities they describe within the global food production system. For example, CXC 53-2003 (fresh fruits and vegetables) or CXC 57-2004 (milk and milk products) could have priority over CXC 19-1979 (radiation) or CXC 30-1983 (frog legs). Subsequent prioritization could consider document length (shorter first) or number of citations of the document in international references (most cited first).**

