

# codex alimentarius commission



FOOD AND AGRICULTURE  
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JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

**Agenda 2**

**CX/FH 11/43/2**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE OF FOOD HYGIENE**

#### **Forty Third Session**

**MIAMI, USA, 5 – 9 DECEMBER 2011**

#### **INDIA'S VIEWPOINTS**

#### **MATTERS REFERRED BY THE CODEX ALIMENTARIUS COMMISSION AND/OR OTHER CODEX COMMITTEES TO THE CODEX COMMITTEE ON FOOD HYGIENE**

Paragraphs 16 and 17 invite the Committee to consider the text in the Annex III and indicate whether the text is acceptable for endorsement, acceptable for endorsement with amendments or not acceptable for endorsement.

While the text is acceptable in principle, there are some amendments necessary to make it more clear and practical. These amendments are indicated below and **with these amendments the text can be endorsed.**

#### **1. TABLE OF CONTENTS**

##### **Section 3: General Requirements**

- Amend the title of the second sub-section as follows:

*'Licensing/**Registration** of vendors'*

**Rationale:** To ascertain consistency with the title inside the Code.

- Amend the title of the third sub-section as follows:

*‘Conditions for licensing **Registration**’*

**Rationale:** To ascertain consistency.

## **2. SECTION 2 SCOPE, USAGE AND DEFINITIONS**

- i. **Sub-section 2.3.2 Clean water:** Amend as follows:

*‘Water from a ~~any natural~~ source where there is no reason to believe the water is contaminated.’*

**Rationale:** Clean water need not necessarily always be from a natural source. Also, natural sources like rivers, springs, lakes etc. may not be physically located everywhere and there water not always clean. Vendors should exercise due diligence while choosing the source of water.

- ii. **Sub-section 2.3.8 Perishables:** The definition of the term ‘Perishable’ is not clear as all the foods spoil sooner or later and also because the perishability of foods is linked to storage conditions. The definition needs to be discussed and amended to bring out the required clarity, for example, by providing a time limit, if possible. This may also be discussed in the context of our comment on Sub-section 7.6 Food storage, Paragraph 7.6.4 below.

## **3. SECTION 3 GENERAL REQUIREMENTS**

- i. **Sub-section 3.3 Conditions for licensing:** The term ‘licensing’ should be replaced with the text ‘licensing/registration’ in the title.
- ii. **Sub-sub-section 3.3.1:** The term ‘license’ in the first line should be replaced with the text ‘license/registration’.
- iii. **Sub-section 3.4, Sub-sub-section 3.4.1:** The term ‘licensed’ in the first line should be replaced with the text ‘licensed/registered’.
- iv. **Sub-section 3.6 Street food advisory service, sub-sub-section 3.6.1:**
  - **Point (b):** Amend the text as follows:

*'(b) to participate ..... of issuance and renewal of licenses/registration.'*

- **Point (c):** Amend the text as follows:

*'(c) to work in close collaboration .... .. officers in-charge of ~~registration~~ issuance and renewal of licenses/registration, .....*

**Rationale:** For the purpose of consistency in the text.

- i. **Sub-section 3.6 Street food advisory service, sub-sub-section 3.6.2:** Amend the text as follows:

*'Advisors ..... familiar with the requirements of ~~the~~ these Guidelines/codes of practices established by relevant authorities, and .....*

**Rationale:** It would be prudent to include codes of practices established by the relevant authorities as the advisors should also be familiar with the requirements of the codes of practices developed by the relevant authorities.

#### **4. SECTION 4 VENDORS**

- i. **Sub-section 4.1 Health condition of the vendors**

- **Sub-sub-section 4.1.1:** Amend the text as follows:

*'No vendor, ..... from any of the ~~following~~ contagious or infectious diseases and symptoms in addition to : jaundice, ..... medical treatment.'*

**Rationale:** The vendor, assistant or food handler may also have the contagious or infectious diseases.

- **Sub-sub-section 4.1.2:** Amend the text as follows:

*'Any vendor, .....food borne disease organisms or any other contagious disease organism, shall not be ..... as a non-carrier.'*

**Rationale:** The vendor, assistant or food handler may also carry the contagious disease organisms.

- ii. **Sub-section 4.2 Personal hygiene and behaviour, Sub-sub-section 4.2.7:** Amend the text as follows:

*'Shall not smoke, or chew chewing gum or anything else, while preparing or serving food'*

**Rationale:** Food handlers should not chew anything while preparing food.

- iii. **Sub-section 4.3 Training of vendors:** The term ‘*licensing*’ in the first line should be replaced with the text ‘*licensing/registration*’.

**Rationale:** For the purpose of consistency in the text.

## 5. SECTION 5 DESIGN AND STRUCTURE AND SECTION 6 APPLIANCES

**Sub-section 5.3.3 Solid waste disposal, 5.3.4 Cleaning & sub-section 6.6:** These refer to paragraph 5.6. However, there is no paragraph 5.6 in the document. Correct reference may be provided.

## 6. SECTION 6 APPLIANCES

- **Paragraph 6.5:** Amend as follows:  
*‘All utensils ..... them for one-half (1.2) **(1/2)** minute .....draining them.’*

- **Paragraph 6.14:** Amend as follows:

*‘Hand washing facilities such as hand wash basins, disposable towels **/tissue papers** and soap should be provided at all times **by the street food vendor or in the street food centers.**’*

**Rationale:** It would be impractical to expect availability of a separate hand wash basin with each individual street food vendors. Many of the reputed food jaunts do not have hand washing facilities for the consumers. Also, disposable towels are not always economical in the context of street food vendors.

## 7. SECTION 7 FOOD PREPARATION

- i. **Sub-section 7.1 Requirements for ingredients, Proposed new paragraph:** Include a new paragraph in the beginning of the Section as follows and re-number the subsequent paragraphs:

- **‘All the ingredients should be edible or food grade in nature, as appropriate.’**

**Rationale:** It is imperative that the ingredients used are edible or food grade in nature, as appropriate, and that the vendors are conscious of this fact.

- **Sub-sub-section 7.1.1:** Amend the text as follows:

*‘Supply of ingredients, including ice, must be from known and reliable **licensed/registered** sources.’*

**Rationale:** It is important that the inputs are procured only from licensed/registered sources.

- **Sub-sub-section 7.1.5:** Amend the text as follows:  
*‘Only permitted food additives **purchased from known and reliable licensed/registered sources** should be used and the amount added should follow the specifications provided.’*

**Rationale:** It is important that the food additives are purchased only from licensed/registered sources.

## ii. **Sub-section 7.2 Cooking and handling**

- **Paragraph 7.2.1:** Amend the text as follows:

*‘Thoroughly wash ....., sufficient ~~running~~ potable **clean** water, to remove adhering surface contamination **and finally rinse thoroughly with potable water**. For any .....*’

**Rationale:** Washing with clean water is adequate for removing adhering surface contamination. The cleaned raw food should be finally rinsed with potable water. This would also save precious potable water without any loss of safety.

- **Paragraph 7.2.3:** Amend as follows:

*‘**Preferably**, there should be an area for handling, storing, cleaning and preparing raw food ingredients separate and apart from the cooked **food**, street food display, **and** handling and serving areas. **Where a separate area for this purpose is not available, appropriate practices should be followed to avoid cross-contamination.**’*

**Rationale:** Street food vendors usually have only a limited space and availability of a separate space for handling of raw foods, while preferable, may not be always possible. With implementation of certain practices, the same area may be utilized for handling all foods without cross-contamination.

- **Paragraph 7.2.4, Point (b):** Amend as follows:

*‘(b) ~~running~~ potable water ..... period not exceeding 4 hours **with water being changed intermittently**; or’*

**Rationale:** Use of **running** potable water for thawing for upto four hours would result in substantial wastage of potable water and would not be readily available with street food vendors.

- **Paragraph 7.2.6:** Amend as follows:

*‘Water used for the purpose of drinking, **and as an ingredient, including when used in preparation of hot or cold drinks and beverages, should be potable.**’*

**Rationale:** Water used as an ingredient in any form should be potable.

- **Paragraph 7.2.7:** Add the following text at the end:

**‘Gases used for preparing aerated beverages should be food grade and stored in rust free pressure vessels till used’.**

**Rationale:** Use of non food grade gases and/or those stored in rusted pressure vessels could be harmful to health.

- iii. **Sub-section 7.3 Serving food, Paragraph 7.3.1:** Amend as follows:

*‘All vendors purchasing street foods for the purpose of serving or selling must assure that such food is from **known and reliable licensed/registered licensed and reliable sources.**’*

**Rationale:** For the purpose of consistency in the text.

- iv. **Sub-section 7.6 Food storage**

- **Paragraph 7.6.4:** Amend as follows:

*‘All ~~non-perishable~~ **long shelf-life** food should be stored in a clean, protected and closed container/cupboard to **control humidity and** prevent cross contamination by pests.’*

**Rationale:** There is no food that is ‘non-perishable’. Use of this term in the absence of a definition would create confusion. Also, it is important that the foods are stored under appropriate atmospheric conditions (e.g. milk powders should be stored in cool and dry conditions). This may be discussed in the context of our comment on Sub-section 2.3.8 Perishables above.

- **Paragraph 7.6.11:** Amend second sentence as follows:

*'Expired food/ingredient shall ..... food.'*

**Rationale:** The guidance also applies to use of ingredients and indicating that expired ingredients should not be used.

## **8. SECTION 8 STREET FOOD CENTRES**

**Section 8.2 Location, design and construction, Paragraph 8.2.3, Point (f):** Amend as follows:

*'(f) provide centralized ..... facilities, equipped with hot and cold running ~~potable~~ clean water, wash basins or sinks ..... vendors in the centre; and'*

**Rationale:** Use of clean water as defined in the document would be appropriate for cleaning and washing operations.

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**Agenda 4**

**CX/FH 11/43/4**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE OF FOOD HYGIENE**

**Forty Third Session**

**MIAMI, USA, 5 – 9 DECEMBER 2011**

#### **INDIA'S VIEWPOINTS**

#### **PROPOSED GUIDELINES ON THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF VIRUSES IN FOOD (AT STEP 3)**

The proposed draft Guidelines are generally acceptable. However, India suggests the following changes:

#### **SECTION 5 - CONTROL OF OPERATION**

**Sub-section 5.3 Incoming Material Requirements, Paragraph 28:** The text may be amended as follows:

*'Raw ingredients ..... ingredients from known and reliable licensed/registered suppliers or .....supervision system.*

**Rationale:** It is important that the raw ingredients are procured only from licensed/registered sources.

#### **SECTION 7 – ESTABLISHMENT: PERSONAL HYGIENE**

**Sub-section 7.1 Health Status, Paragraph 43:** There is no section 3.4 as mentioned in brackets in the paragraph. Correct reference may be provided.

**Sub-section 7.2 Illness and Injuries, Paragraph 45:** The text may be amended as follows:

*'Food handlers ..... seek medical advice **and should be allowed in the food establishment only declared fit by the medical practitioner.**'*

**Rationale:** The food handler having symptoms of acute hepatitis should not be allowed to work in the food establishment without being declared fit.

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**Agenda 5**

**CX/FH 11/43/5**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE OF FOOD HYGIENE**

#### **Forty Third Session**

**MIAMI, USA, 5 – 9 DECEMBER 2011**

#### **INDIA'S VIEWPOINTS**

#### **PROPOSED DRAFT REVISION OF THE PRINCIPLES FOR THE ESTABLISHMENT AND APPLICATION OF MICROBIOLOGICAL CRITERIA FOR FOODS (AT STEP 3)**

We would like to thank the members of the PWG for the progress made in the development of the document. Our specific comments on it are provided below.

#### **REPORT OF THE PHYSICAL WORKING GROUP**

The paragraph 18 of the report indicates that the Committee needs to consider the communication issue. In this context, we would like to submit that the guidance to be developed on the aspect of communication by use of MC in respect of FSO/PO/PC should include provisions that i) in such cases it should be clearly communicated that the MC is linked to FSO/PO/PC; ii) these metrics should be invariably communicated alongwith the MC; and iii) the associated risk assessment should be available for scrutiny on request. These actions on part of the communicator would allow better understanding of the requirements by the stakeholders at which the communication is aimed at.

#### **APPENDIX I**

1. **TABLE OF CONTENTS:** The table of contents of the document should also include information on the proposed Annex II pertaining to the statistical and mathematical considerations in elaboration of MC that is proposed to be developed with the technical support of the FAO/WHO.

## 2. SECTION: INTRODUCTION

- i. **Paragraph 1:** The last sentence should be deleted.

**Rationale:** The guidance in the last sentence of Paragraph (1), that use of food safety risk management (MRM) metrics allows establishment of a direct relationship between microbiological criteria and public health outcomes, is not entirely correct. A direct relationship between microbiological criteria and public health outcomes exists even in absence of MRM metrics. For example, the *Code of Hygienic Practice for Powdered Infant Formulae for Infant and Young Children (CAC/RCP-66)* specifies microbiological criteria to ensure public health in the context. The CAC/RCP-66 does not include MRM metrics.

Use of MRM metrics, however, allows a more objective and transparent relation between the level of stringency of control measures or entire food safety control systems and the required level of public health protection. This is already noted in the *Codex Principles and Guidelines for the Conduct of Microbiological Risk Management (CAC/GL-63)*, *Annex II Guidance on Microbiological Risk Management Metrics* and need not be repeated here.

- ii. **Paragraph 2:** The first sentence should be amended as follows:

*'The microbiological safety ... .. implementation of **validated** control measures **that have been validated, where possible, and** often using ... ..'*

**Rationale:** To ensure that the importance of such control measures that facilitate food safety but cannot always be validated is not undermined. Control measures such as air locks to minimize cross contamination, hand washing procedures, and several other basic hygiene practices as described in the *International Recommended Code of Practice: General Principles of Food Hygiene (CAC/RCP 1-1969)* are of such a nature that it is not feasible to determine their quantitative effect on specific hazards. That such control measures cannot always be validated has been recognized in the *Guidelines for the Validation of Food Safety Control Measures (CAC/GL 69 – 2008)*.

## 3. SECTION: COMPONENTS OF MICROBIOLOGICAL CRITERIA

### Subsection *Microbiological aspects of criteria*

- i. **Paragraph 12:** The third sentence should be amended as follows:

*‘Although the methods used should be ~~the most~~ sensitive and reproducible for the purpose, ~~in certain cases~~ **routine methods used for in-plant testing** might sacrifice some degree of sensitivity and reproducibility in the interest of speed and simplicity.’*

**Rationale:** The word ‘most’ in the first sentence is restrictive and is likely to limit the choice of methods. Further, a clear indication of the specific conditions when such a sacrifice might be justified should be included in the text to avoid any potential of misuse of the guidance. The existing *Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21)* clearly indicate in the penultimate sentence in the sub-sub-section 5.2.1 that such sacrifice in sensitivity and reproducibility might be necessary for methods used for in-plant testing. This should be retained. Such methods are normally referred to as the routine methods.

- ii. **Proposed new paragraphs:** In the sub-sub-section *Analytical Methods*, after existing Paragraph 13, insert the following two paragraphs:

**‘Methods used to determine the suitability for consumption of highly perishable foods, or foods with a short shelf-life, should be chosen wherever possible so that the results of microbiological examinations are available before the foods are consumed or exceed their shelf-life.’**

**‘The microbiological methods specified should be reasonable with regard to complexity, availability of media, equipment etc., ease of interpretation, time required and costs.’**

**Rationale:** The CAC/GL-21, in the sub-sub-sections 5.2.1 and 5.2.2, includes the above guidance which is useful and should be retained.

- iii. **Paragraph 18:** The meaning of the last sentence is not clear.

- iv. **Proposed new paragraph:** In the sub-sub section *Sampling Plans*, before existing Paragraph 19:

**Sampling plans should be logistically and economically feasible.**

**Rationale:** The guidance in the CAC/GL-21, in the sub-sub-section 6.1 is useful and should be retained. Further, the term ‘*administratively*’ in the

existing text in the existing CAC/GL-21 is proposed to be replaced with 'logistically' for clear understanding.

- v. **Paragraph 22:** It is noted that while explanation for the term 'moving window' is being included, the document does not include any guidance on use of the concept of moving window. It would be useful to retain the text only if guidance on use of the concept is also provided in the document.
- vi. **Paragraph 24:** Amend the text as follows:

*'web-based tools **developed by reputed international organizations like FAO can be utilized** for estimating .....sampling plans ~~can be~~ utilized to .....*'

**Rationale:** It would be appropriate to include guidance indicating that only web-tools developed by credible international organizations should be used.

The above proposed insertions to retain useful guidance from the existing CAC/GL-21 would necessitate re-numbering of affected paragraphs.

#### 4. **SECTION: RELATIONSHIP BETWEEN MICROBIOLOGICAL CRITERIA AND OTHER MICROBIOLOGICAL RISK MANAGEMENT METRICS**

**Paragraph 28:** Amend the text as follows:

*'**The need for** deriving a risk based .....from ALOP and ~~the need for other~~ MRM metrics .....and computing power.'*

**Rationale:** Editorial correction to bring out the intended meaning in the text.

#### 5. **SECTION: PRINCIPLES FOR ESTABLISHING AND APPLYING MICROBIOLOGICAL CRITERIA**

i. **Paragraph 31**

- **First sentence:** Retain the text 'MC should be science based ..... approach' and remove the square brackets.

**Rationale:** That MC is a risk management measure is very obvious and need not be stated. The above referred alternative text is more direct and clear.

- **Second sentence:** The text should be amended as follows:

*'A MC ... .. the stated purpose and set at a level that is not more trade restrictive than required to achieve ~~an importing member's ALOP~~ **necessary level of public health protection. Such need is demonstrated, for example, by epidemiological evidence that the food under consideration may represent a public health risk and that a criterion is meaningful for consumer protection, or as the result of a risk assessment. The criterion should be technically attainable by applying Good Manufacturing Practices.**'*

**Rationale:** Countries often use means other than ALOP to express their food safety requirements. The guidance in the document should be useful also to the countries that do not utilize ALOP but where other adequate food safety standards and control measures are generally in place and used as a means to meet and communicate their food safety requirements. This is mostly true in case of developing countries. The reference to ALOP in this document, in a manner that conveys setting-up of ALOP as the prerequisite for establishing MC, if retained, would appear to limit application of the final document to those few countries that have established ALOP. The proposed amendment is in line with the objective of this document, which is primarily to provide guidance on use of microbiological criteria in respect of the MRM metrics. The document is not required to provide guidance on the specific means to express a required level of public health protection by the countries.

The guidance on the means to demonstrate a need for establishment of a microbiological criteria and its attainability with the implementation of Good Manufacturing Practices, included in sub-section 4.1 in the existing *Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21)*, is useful and should be retained.

ii. **Paragraph 37:** The first sentence should be amended as follows:

*'Mandatory MCs .... ..... where no other effective tools are available, and where they are ~~expected to improve the degree of protection offered to the consumer~~ **necessary to ensure public health protection.**'*

**Rationale:** It would be appropriate to link establishment of mandatory microbiological criteria with the necessity to ensure public health rather than with improvement in degree of protection offered. This is so because if the public health is ensured with the prevailing mandatory requirements, there need not be a requirement to apply mandatory microbiological criteria merely to further improve the degree of protection offered.

iii. **Paragraph 43:** Delete the second sentence, including the bullets, in the paragraph.

**Rationale:** To avoid duplication. The guidance on when to review an MC is elaborately and more appropriately included in the paragraph 46 and need not be repeated.

iv. **Paragraph 45:** It is proposed to amend the Paragraph as follows:

*'The risk management framework ..... improved scientific knowledge and the increasing knowledge of public health risk ~~and related food safety risk management metrics (FSO, PO, and PC)~~. The goal should ultimately be to achieve a more quantifiable estimation of the linkages between microbiological criteria, other metrics and public health outcomes, **where necessary.**'*

**Rationale:** In the **first sentence**, the inclusion of a specific reference to food safety risk management metrics (FSO, PO, PC) appears to be misplaced. These metrics are used to express the required level of stringency of control measures in relation to the anticipated public health risk. It is, therefore, an increase in the knowledge of public health risk and not specifically in the level of knowledge of these metrics that may necessitate a review of risk management framework. The guidance in the **last sentence**, indicating that the goal of the review should be to achieve a more quantifiable estimation of linkages between microbiological criteria and other metrics, is not justified. The extent of quantification of the linkages between the microbiological criteria and other metrics would primarily be dependent upon the need of such quantification. This should be so indicated in the guidance.

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**Agenda 7**

**CX/FH 11/43/7**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE OF FOOD HYGIENE**

#### **Forty Third Session**

**MIAMI, USA, 5 – 9 DECEMBER 2011**

#### **INDIA'S VIEWPOINTS**

#### **PROPOSED DRAFT ANNEX ON MELONS TO THE CODE OF HYGIENIC PRACTICE FOR FRESH FRUITS AND VEGETABLES (CAC/RCP 53-2003) (At Step 3)**

The proposed draft Guidelines are generally acceptable. However, India suggests the following changes:

#### **APPENDIX II**

#### **SECTION 5 - CONTROL OF OPERATION**

#### **Sub-section 5.2 Key aspects of hygiene control systems,**

**5.2.2.1 Post-harvest water use:** The text should be amended as follows:

*'Water is often used in dump tanks to transport melons from field containers into the packing or processing establishment. If the temperature of the water in the dump tank is cold and the internal temperature of the melons is hot from field heat, a temperature differential is created that may aid in the infiltration of microbial pathogens into the rind and/or the edible portion of the fruit. The following should be considered when using ~~post-harvest~~ water **after harvesting**.'*

**Rationale :** To have a clear meaning of the text.

**5.2.2.1 Post-harvest water use:**

**Bullet point 1:** The text may be deleted as it is already mentioned in sub-sub-section 4.4.2, bullet point 5 where it is more appropriate.

**5.2.2.2 Chemical Treatments**

**Bullet point 1:** The text may be deleted as it is already mentioned in sub-sub-section 4.4.2, bullet point 5 where it is more appropriate.

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**Agenda 8**

**CX/FH 11/43/8**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE OF FOOD HYGIENE**

**Forty Third Session**

**MIAMI, USA, 5 – 9 DECEMBER 2011**

#### **INDIA'S VIEWPOINTS**

#### **DISCUSSION PAPER ON THE REVIEW OF THE RISK ANALYSIS PRINCIPLES AND PROCEDURES APPLIED BY THE CODEX COMMITTEE ON FOOD HYGIENE**

The Committee has been invited to consider the amendments proposed in the CCFH Risk Analysis Policy document with a view to make the text simpler and focused on the risk analysis policy applied by the CCFH and also to avoid inclusion of details that are not relevant to the Procedural Manual.

The proposed amendments to the document elaborated are acceptable. In addition it would be useful to retain the guidance in the second sentence of the paragraph 5. The same can be appropriately included after the first sentence in the Paragraph 4 as follows:

*“Members, who wish to make a request for inclusion of new item .....  
(CAC/GL 63-2007. **The proposals for new work should indicate the specific nature or outcome of the new work being proposed (e.g., new or revised code of hygienic practice, risk management guidance document).**  
CCFH identifies .....JEMRA. Further details are provided in the Annex.”*

With above amendments, the Annex can then be deleted without any loss of important guidance.