'Codex HACCP' version 2020

What learnings ?

In 1969, the Codex Alimentarius published a document entitled GENERAL PRINCIPLES OF FOOD HYGIENE (CAC/RCP 1-1969), more often referred to by the diminutive 'Codex HACCP', which in particular:

- defined the **basic principles for food hygiene** applicable throughout the food chain (from primary production to the final consumer) to ensure that food is safe and suitable for consumption; the objective being to ensure that food is safe and suitable for human consumption;
- recommended the **use of HACCP** method as a means of improving food safety; and indicated how to implement these [HACCP] principles.

This founding document has just been revised for the 5th time: the 2020 version has been available since last week in English.

Since 2003 (date of the previous version of the 'Codex HACCP') the approach to Food Safety Management has undergone a number of changes (see the numerous ExarisInfo since 2005) with in particular the publication of **ISO 22000** in 2005, the integration of risks linked to malicious acts, the prevention of Food Fraud, the reinforcement of requirements in terms of Food Safety Culture, the introduction of the notion of Preventive Controls in the US regulation, the integration of a more global "risk-based approach" with the revision of ISO 22000 in 2018... with the emergence of a new or renewed lexicon (PRP, PRPo, critical limit, action criteria, etc.) that is sometimes complicated to decrypted by agri-food stakeholders.

The majority of norms and standards related to food safety management claim, more or less, the legacy of the Codex. Moreover, the Codex is still a source of reference for a large number of countries in the world, whose local standards and regulations are directly inspired by it. We therefore find it particularly interesting to analyze the extent to which this new revision of the 'Codex HACCP' can help to clarify, if not arbitrate, the recurrent methodological debates relating to the HACCP method.

1. Codex definitions: confusion or solutions ?

A general observation can be made on reading the text: its authors, although perfectly aware of the content of the ISO 22000 standard (which since 2005 has become the methodological reference for the implementation of a certifiable food safety management system), did not wish to align with its definitions.

This may come as a legitimate surprise or even regret, for example with regard to the term **"Corrective Action"**. While all ISO standards agree on the definition of "action to **eliminate the cause** of a nonconformity and to prevent recurrence" (ISO22000:2018 §3.10), the Codex maintains an alternative definition "Any action taken when a deviation occurs in order to re-establish control, segregate and determine the disposition of the affected product if any and prevent or minimize reoccurrence of the deviation" which is more consistent with a "correction" in the sense of ISO22000.

It will also be obvious to everyone that the concept of **Operational PRP (OPRP)** is absent from this text (see below).

Nevertheless, in a context where the 2018 revision of the ISO22000 standard sometimes brings more confusion than solutions at operational level (see 3. CCP and PRPo : and ExarisInfo 80), this choice of the Codex to keep a good part of its historical line may offer some arbitration keys…

2. PRPs and GHPs

Although it does not define an oPRP, the codex contains a definition of a **PRP** (Prerequisite Programmes), within which it distinguishes **GHPs** (Good Hygiene Practices), defined as an integral part of PRPs but with its own definition: " **Fundamental measures and conditions** applied at any step within the food chain to provide safe and suitable food." It gets more complicated, therefore! or more precise...

Indeed, Chapter I of the Codex details these GHPs globally according to the same breakdown as in the 2003 version, even if the order of the chapters has been modified. It should be noted that this new version does not deal with the prevention of malicious acts or the prevention of food fraud and remains exclusively focused on accidental or adventitious food safety related contaminations.

Topics addressed in other norms and standards under the title of Prerequisite Programmes (ISO22000) or others (BRC, IFS, etc.), are addressed in the Codex GHPs chapter with applicable recommendations for: **Primary** (agricultural) **Production** stage, **design of production sites**, **Training and skills** (note a reference to Food Safety Culture in the *Use* section of the document),

Maintenance, **cleaning and disinfection**, **pest control**, **Personnel hygiene**, **allergen management** (with the addition of a chapter and reference to a dedicated Codex guide - CXC 80-2020), **consumer information** and **traceability**, **transport**, ...

It is in **section 7 Control of operations** that the main changes are concentrated, with in particular the introduction of the notion of "**Good Hygiene Practices** (that) **need greater attention**" (Codex§ 7.1.3), with the implementation of monitoring if necessary... a step towards the OPRP?

3. CCP and PRPo : the end of the decision tree?

We do not here come back to the difficulties of interpretation caused by the new definition of an OPRP according to ISO22000:2018 (already addressed in ExarisInfo 80); let us simply point out that the 2020 version of the 'Codex HACCP' with its "GHPs requiring greater attention" reinforces the relevance of the previous definition of an OPRP, which explicitly established the link between OPRP and PRP: "**PRP identified by the hazard analysis as essential** in order to control the likelihood of introducing food safety hazards (...)".

The authors of the Codex have chosen, in **chapter 2 dedicated to the HACCP method**, to continue to focus on the determination of CCPs, leaving the choice to professionals of methodological tools to define other types of control measures.

This new revision acknowledges the **disappearance of the decision tree** as a tool for determining CCPs! It has been replaced by paragraph 3.7, which states, among other things:

"*To identify a CCP, **whether using a decision tree or other approach**, the following should be considered: (…)*

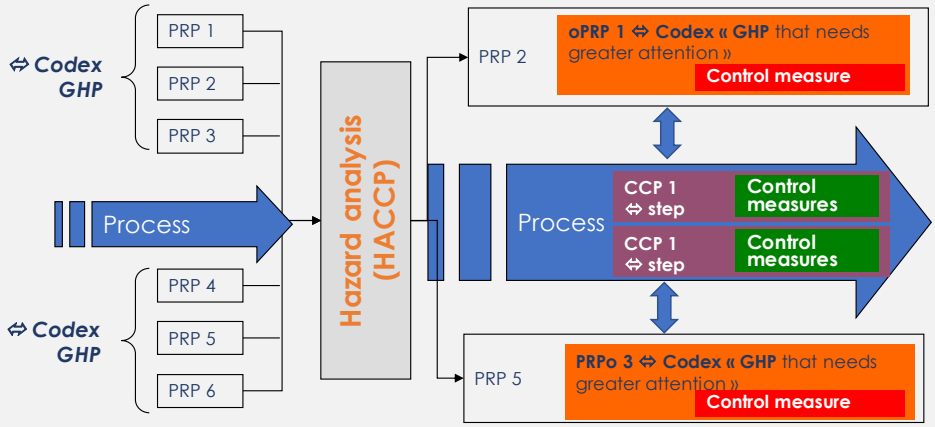


Fig.1 - CCP or PRPo according to Codex 2020

- *(…) If the control measure cannot be used at this step, then this step should not be considered as a CCP for the significant hazard.*
- *If the control measure can be used at the step being analyzed, but can also be used later in the process, or there is another control measure for the hazard at another step, the step being analyzed should not be considered as a CCP.*
- *(…) whether a control measure at a step is used in combination with a control measure at another step to control the same hazard; if so, **both steps should be considered as CCPs**. »*

This approach, which focuses exclusively on CCPs, has the very significant advantage, in our view, of clarifying the concept of CCP, of strengthening the link with the notion of "essential" step in the process and, above all, of putting an end to the systematic use of a "decision tree" (also removed from the Codex annexes), which is often considered by professionals as an imposed exercise and a source of much confusion.

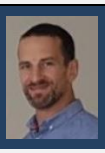
Finally, it should be noted that the definition of a **critical limit** proposed by the Codex differs slightly from the ISO 22000:2018 definition since it is a "criterion, **observable or measurable** (...)". This subtlety is of particular interest to us in that it does not exclude the possibility of **observable criteria** for monitoring a CCP (e.g. the positioning and integrity of a sieve). Moreover, this position reinforces CCPs nature and avoids the inconsistency that has been observed since the publication of ISO 22000:2018: the "downgrading" of CCPs into PRPo on the pretext that the critical limit was not measurable but observable!

Conclusion

This 2020 revision of the CAC/RCP 1-1969 is fortunately not a revolution. However, this text is a significant contribution to help anticipate or correct the methodological drifts in the application of the HACCP method, observed in recent years with the publication of the 2018 version of ISO22000 or (for companies concerned by the US market) the FSMA.

On the scale of Exaris and the many training courses and tools we offer on the subject, this text will certainly be a valuable reference in that it reinforces the consistency and relevance of the interpretations we have been offering you for many years now! So do not hesitate...

Contactez-nous pour avancer ensemble !
et retrouvez-nous sur www.exaris.fr



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