

CODEX COMMITTEE ON FOOD LABELLING

European Union Comments on CL 2024/29-FL

Approach and criteria for evaluation and prioritization of the work of CCFL

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) would like to thank the Canadian Secretariat of the Codex Committee on Food labelling (CCFL) for the revised draft *Approach and criteria for evaluation and prioritization of the work of CCFL*.

General comments

The EUMS note that several Codex committees have developed or are in the process of developing their own processes and tailored criteria for managing work priorities.

While the EUMS greatly appreciate the efforts of the committees engaging in work management improvement, the EUMS feel that a detailed overview and a centralised access to all existing prioritisation processes and criteria would be beneficial for Members wishing to propose new work that addresses their needs in Codex.

For that purpose, all prioritisation mechanisms and other work practices that have been developed on this issue should be collated in one single place. Such place could be the practical guidance for new work proposals that is currently being drafted by the Codex Secretariat.¹

Specific comments

The EUMS would like to thank the Canadian secretariat of the CCFL for having taken on board many of their suggestions.

The EUMS are of the opinion that there is a need to further:

- explain how these additional criteria and process would have to be combined with the provisions foreseen in Section II Part 2 (Proposals to undertake new work or to revise a standard) of the Procedural Manual,
- clarify globally the text.

The EUMS would therefore propose to introduce following modifications in the draft *Approach and criteria for evaluation and prioritization of the work of CCFL*:

Purpose:

1. The following guidelines are established to assist the CCFL to identify, prioritize and efficiently carry out its work, as needed, when there are multiple new work proposals to consider.

¹ REP22/EXEC2, paragraph 118 (iii)

Scope:

2. These guidelines apply to new work proposed to the CCFL and lay down criteria and a process for evaluating the priority of new work proposals, including the revision of current texts.
3. These ~~criteria and process prioritization approach~~ ~~has~~ ~~been~~ ~~developed~~ in addition to the “criteria for ~~new work~~ the establishment of work priorities” applicable to general subjects as outlined in the *Procedural Manual*. ~~They Additional criteria relevant to the work of the CCFL and the rating scheme~~ have been developed, taking into account the mandate of the Codex Alimentarius Commission, the priorities outlined in the Codex Strategic Plan, and the general principles of food labelling included in the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) (GSLPF).

Additional criteria for evaluating and prioritizing new work

4. The following are the additional criteria against which the new work to be undertaken in CCFL may be assessed, **including both positive and negative impacts**:

Criterion	Further information	Rating
Relevance to CCFL mandate	Does the proposed new work fit within the terms of reference of CCFL?	Yes/No/Partially
<u>(If applicable) Contributes to achieving internationally adopted global goals related to food safety, health or nutrition</u>	<u>Identify the organization and goal² and describe how the proposed new work can address the goal, within the mandate of CCFL</u>	<u>Not applicable</u>
Impact on consumer health	Potential of proposed new work to prevent, reduce or resolve a consumer health risk	High Medium Low
Addresses false, misleading or deceptive labelling practices	Potential of the proposed new work to prevent, reduce or resolve false, misleading or deceptive labelling practices	High Medium Low
Impact on consumer’s ability to make an informed choice	Potential of the proposed new work to assist the consumer in making an informed choice	High Medium Low
Impact on trade practice	Positive -Impact on international trade	High Medium Low

Process for evaluating **and prioritizing** new work

5. As with normal Codex procedures, new work proposals should be presented to CCFL in the format of a project document addressing the criteria given under the “*Criteria for establishment of work priorities*” for general subjects in the *Procedural Manual*. Additionally, the proposal should preferably also include a self-assessment, including supporting rationale and references, that takes into account the additional criteria outlined in this document.
6. ~~New work proposals should be submitted or supported by a Member and should contain three elements: (1) a discussion paper, (2) a project document (in accordance with Section II Part 2 (Proposals to undertake new work or to revise a standard) of the Procedural Manual), and (3) a self-assessment based on the criteria set out in the Procedural Manual (see Section 2, para. 40 to 42) and, where appropriate, the additional criteria (see above para. 3).~~

² For example: **WHA66.10: World Health Organization - Global action plan for the prevention and control of Noncommunicable diseases (NCDs) 2013–2020 – Reduction of global population’s intake of salt by 30% by 2025**

7. All proposals for new work should follow the process and provisions outlined in para 12 of Section II Part 2 of the *Procedural Manual* for proposals to undertake new work or revise a Standard and include:
 - a. the purposes and the scope of the standard;
 - b. its relevance and timeliness;
 - c. the main aspects to be covered;
 - d. an assessment against Section 2: Criteria for the establishment of work priorities;
 - e. relevance to the Codex strategic objectives;
 - f. information on the relation between the proposal and other existing Codex documents as well as other ongoing work;
 - g. identification of any requirement for and availability of expert scientific advice;
 - h. identification of any need for technical input to the standard from external bodies so that this can be planned for; and
 - i. the proposed timeline for completion of the new work, including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years.
8. **If applicable, the new work proposal should also describe how the work would contribute to achieving internationally adopted global goals of the FAO or WHO related to food safety, health or nutrition.**
9. New work proposals should furthermore also indicate whether the work, if approved to commence, would likely lead to preparation of a new Codex text or revision of an existing Codex text.
10. **Based on the amount of work on the Committee's agenda and the number of new work proposals, the Committee may decide** ~~It may be appropriate for CCFL to establish an *ad hoc* working group, particularly in cases where multiple proposals are under consideration, that could be tasked to evaluate and prioritize new work proposals. The *ad hoc* working group could take place during CCFL as an in-session working group,~~ **open to all interested Members and Observers,** and tasked to make recommendations to CCFL.
11. ~~As required, The~~ CCFL **has the responsibility to** may prioritize new work proposals ~~and revision,~~ taking into account, ~~where they exist,~~ the self-assessment in the new work proposals ~~and/or the~~ recommendations of the *ad hoc* working group.
12. The Committee may reassess the priority of ~~each item~~ a new work proposal if new information becomes available relating to ~~an item~~ that proposal. Such information may be submitted for consideration and the priority for the new work proposal reconsidered.
13. Ideally, the additional criteria should be applied in a stepwise manner, in the order set out in ~~para 3 the criteria~~ above. If the Committee decides that a proposed work does not fall under the terms of reference of CCFL, then the remaining criteria do not need to be assessed. ~~CCFL may however decide to report the proposal to the Commission in accordance with Section 2, para 41 of the Procedural Manual.~~
14. The new work proposals ~~proposed work~~ should be assessed against the criteria for the establishment of new work priorities set out in the *Procedural Manual* (see Section 2, para. 40 to 42 of the *Procedural Manual*) and the above additional criteria as per the ratings given for each criterion, ~~New work proposals will ultimately and~~ be prioritized as per the application of the criteria provided in the *Procedural Manual* and the overall rating received through ~~this assessment this prioritization process.~~
15. Additional criteria, such as feasibility of the proposed new work, may be necessary and developed later for application while considering two or more items of similar priority.
16. **The CCFL will maintain the inventory of future work and emerging issues discussion paper that will include all potential work items relevant to CCFL. The inventory paper will be kept current at every session with a different Codex member taking on responsibility each time.**