

**CODEX COMMITTEE ON GENERAL PRINCIPLES**  
**(29<sup>th</sup> Session)**  
**Paris, France, 9-13 March 2015**

**European Union Comments on**

**Agenda item 2: Matters Referred to the Committee**

**Part A. MATTERS ARISING FROM THE 37<sup>TH</sup> SESSION OF THE CODEX ALIMENTARIUS COMMISSION (CAC)**

**Codex Strategic Plan 2014-2019**

*Mixed Competence  
Member States Vote*

<b>Strategic Goal</b>	<b>Objective</b>	<b>Activity</b>	<b>Expected Outcome</b>	<b>Measurable Indicators/Outputs</b>
1: Establish international food standards that address current and emerging food issues.	1.1: Establish new and review existing Codex standards, based on priorities of the CAC	1.1.1: Consistently apply decision-making and priority-setting criteria across Committees to ensure that the standards and work areas of highest priority are progressed in a timely manner.	New or updated standards are developed in a timely manner	- Priority setting criteria are reviewed, revised as required and applied. - # of standards revised and # of new standards developed based on these criteria.
<p><b>Question to the Committee:</b>  <i>Is this activity relevant to the work of the Committee?</i>            Yes. Not only is CCGP a committee that is able to set standards, it is also responsible to ensure the necessary mechanisms are in place for other Committees to conduct their standard setting work effectively.</p> <p><i>Does the Committee use any specific criteria for standards development?</i>            Like all Committees, CCGP utilises the criteria laid down in the Procedural Manual to develop standards. The EUMS continue to believe that CCGP should be kept apprised of other Committees' work in order to ensure consistency of the provisions of the Procedural Manual in standard development.</p> <p><i>Does the Committee intend to develop such criteria?</i>            Not at present.</p>				
	1.2: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.	1.2.1: Develop a systematic approach to promote identification of emerging issues related to food safety, nutrition, and fair practices in the food trade.	Timely Codex response to emerging issues and to the needs of Members.	- Committees implement systematic approaches for identification of emerging issues. - Regular reports on systematic approach and emerging issues made to the CCEXEC through the Codex Secretariat.
<p><b>Question to the Committee:</b>  <i>Is this activity relevant to the work of the Committee?</i>            It could be, particularly if related to procedural and/or general matters.</p> <p><i>How does the Committee identify emerging issues and members needs? Is there a systematic approach? Is it necessary to develop</i></p>				

<i>such an approach?</i>				
Emerging issues are reported by the members directly to Committees or the CAC. Depending on the nature of the emerging issues, this could necessitate a reaction on the part of CCGP. In that event, the matter would be brought directly by the member concerned to CCGP. The EUMS believe the current approach works well. No new mechanisms are thus foreseen.				
		1.2.2: Develop and revise international and regional standards as needed, in response to needs identified by Members and in response to factors that affect food safety, nutrition and fair practices in the food trade.	Improved ability of Codex to develop standards relevant to the needs of its Members.	- Input from committees identifying and prioritizing needs of Members. - Report to CCEXEC from committees on how standards developed address the needs of the Members as part of critical review process.
<b>Question to the Committee:</b> <i>Is this activity relevant to the work of the Committee?</i> This could be relevant to the work of CCGP.				
<i>How does the Committee identify emerging issues and members needs? Is there a systematic approach? Is it necessary to develop such an approach?</i> See above.				
2: Ensure the application of risk analysis principles in the development of Codex standards.	2.1: Ensure consistent use of risk analysis principles and scientific advice.	2.1.1: Use the scientific advice of the joint FAO/WHO expert bodies to the fullest extent possible in food safety and nutrition standards development based on the "Working Principles of Risk Analysis for Application in the Framework of the Codex Alimentarius".	Scientific advice consistently taken into account by all relevant committees during the standard setting process.	- # of times the need for scientific advice is: - identified, - requested and, - utilized in a timely manner.
<b>Question to the Committee:</b> <i>Is this activity relevant to the work of the Committee?</i> The application of risk analysis principles in the development of Codex standards – as a cornerstone of Codex work, is, relevant to the work of CCGP in a general sense. CCGP also has a role to play in ensuring that the provisions on risk analysis principles as laid down in the Procedural Manual can be applied consistently by all Committees.				
<i>Does the committee request scientific advice in course of its work, how often does it request such advice?</i> No				
<i>Does the committee always use the scientific advice, if not, why not?</i> N/a.				
		2.1.2: Encourage engagement of scientific and technical expertise of Members and their representatives in the development of Codex standards.	Increase in scientific and technical experts at the national level contributing to the development of Codex standards.	- # of scientists and technical experts as part of Member delegations. - # of scientists and technical experts providing appropriate input to country positions.
Not applicable to CCGP.				
		2.1.3: Ensure that all relevant factors are fully considered in exploring risk management options in the context of Codex standard development.	Enhanced identification, and documentation of all relevant factors considered by committees during the development of Codex standards.	- # of committee documents identifying all relevant factors guiding risk management recommendations. - # of committee documents clearly reflecting how those relevant factors were considered in the context of standards development.
<b>Question to the Committee:</b> <i>Is this activity relevant to the work of the Committee?</i>				

<p>Yes, it is relevant when CCGP develops standards.</p> <p><i>How does the Committee ensure that all relevant factors have been taken into account when developing a standard and how are these documented?</i></p> <p>The Procedural Manual is already sufficiently clear in its Working Principles for Risk Analysis that risk management should follow a structured approach including preliminary risk management activities, evaluation of risk management options, monitoring and review of the decision taken. These principles require a transparent, consistent and fully documented risk management process, and a presentation of the conclusion of the risk assessment before making final proposals or decisions on the available risk management options.</p>				
		2.1.4: Communicate the risk management recommendations to all interested parties.	Risk management recommendations are effectively communicated and disseminated to all interested parties.	- # of web publication/communications relating Codex standards. - # of media releases disseminating Codex standards.
<p><b>Question to the Committee:</b></p> <p><i>Is this activity relevant to the work of the Committee?</i></p> <p>Not particularly, except when it is linked to the setting of a standard by CCGP.</p> <p><i>When taking a risk management decision, does the committee give guidance to members how to communicate this decision? Would more consideration of this be helpful to members?</i></p> <p>Such consideration could be helpful. The EUMS believe that once the Codex general communication strategy is developed, this could facilitate Committees ability to communicate risk management recommendations to interested parties as necessary.</p>				
3: Facilitate the effective participation of all Codex Members.	3.1: Increase the effective participation of developing countries in Codex.	3.1.5: To the extent possible, promote the use of the official languages of the Commission in committees and working groups.	Active participation of Members in committees and working groups.	- Report on number of committees and working groups using the languages of the Commission
<p><b>Question to the Committee:</b></p> <p><i>Is this activity relevant to the work of the Committee?</i></p> <p>Yes, promoting the effective participation of developing countries is of interest for all Committees, particularly CCGP where issues of interest to the entire organisation are discussed.</p> <p><i>Is the use of official languages in working groups of the committee sufficient?</i></p> <p>The EUMS would recommend using as many languages as possible in WGs in order to facilitate members' participation.</p> <p><i>What are the factors determining the choice of languages?</i></p> <p>This mainly depends on the Member chairing the WG.</p> <p><i>How could the situation be improved?</i></p> <p>The EUMS are open to suggestions on how the situation may be improved. Hosting countries have a set of criteria to meet as hosts. These include provisions with respect to language diversity. Where host countries or members anticipate difficulties, the EUMS believe these should be signalled to the Codex secretariat, in sufficient time, to find a remedy.</p>				
	3.2: Promote capacity development programs that assist countries in creating sustainable national Codex structures.	3.2.3: Where practical, the use of Codex meetings as a forum to effectively conduct educational and technical capacity building activities.	Enhancement of the opportunities to conduct concurrent activities to maximize use of the resources of Codex and Members.	- # of activities hosted on the margins of Codex meetings.
<p><b>Question to the Committee:</b></p> <p><i>Is this activity relevant to the work of the Committee?</i></p> <p>Yes, insofar as such capacity development programs can help all member countries to participate in Codex work.</p> <p><i>Does the Committee organize technical capacity activities or other activities in the margins of Committee sessions? If yes – how many and with which topics have been organized in the past.</i></p> <p>Capacity building that will allow members to play a more active role in CCGP is most welcome. The EUMS believe it is not necessarily useful to organise technical capacity activities or other activities in the margins of CCGP unless such activities are directly related to the procedural or more general issues dealt with by CCGP.</p> <p><i>If no – could this be useful and what topics could be addressed?</i></p> <p>The EUMS believe that capacity building in itself is a good thing however the topics chosen for such activities should be selected in consultation with the parent organisations in order to avoid inconsistencies and duplication of work.</p>				

4: Implement effective and efficient work management systems and practices.	4.1: Strive for an effective, efficient, transparent, and consensus based standard setting process.	4.1.4: Ensure timely distribution of all Codex working documents in the working languages of the Committee/Commission.	Codex documents distributed in a more timely manner consistent with timelines in the Procedural Manual.	<ul style="list-style-type: none"> <li>- Baseline Ratio (%) established for documents distributed at least 2 months prior to versus less than 2 months prior to a scheduled meeting.</li> <li>- Factors that potentially delay the circulation of documents identified and addressed.</li> <li>- An increase in the ratio (%) of documents circulated 2 months or more prior to meetings.</li> </ul>
<p><b>Question to the Committee:</b>  <i>Is this activity relevant to the work of the Committee?</i>  Yes. The EUMS strongly believe that it is essential to maintain transparent and consensus-based decision making in the framework of Codex Alimentarius, particularly when dealing with procedural and general issues and where the standards adopted apply globally. This is necessary to ensure the legitimacy, credibility and worldwide acceptance of Codex standards.</p> <p>Furthermore, every possible effort should be made to ensure the timely distribution of documents in order to ensure the best possible input into the decision-making process.</p> <p><i>Does the Committee have a mechanism in place to ensure timely distribution of documents? What could be done to further improve the situation?</i>  The requirement for timely distribution of documents already exists in the Procedural Manual. Both the Codex Secretariat and concerned members should be more disciplined in ensuring its implementation. Where timely distribution of documents cannot be achieved, members should be informed immediately as a matter of course. The EUMS believe that the untimely distribution of documents occurs to the detriment of members and the entire organisation alike, and should thus be avoided at all costs.</p>				
		4.1.5: Increase the scheduling of Work Group meetings in conjunction with Committee meetings.	Improved efficiency in use of resources by Codex committees and Members	- # of physical working group meetings in conjunction with committee meetings, where appropriate.
<p><b>Question to the Committee:</b>  <i>Is this activity relevant to the work of the Committee?</i>  Yes. In order to be more effective, these should be well-known in advance and planned accordingly in order to feed into, and facilitate, the work of the Committee.</p> <p><i>Does the Committee hold physical working groups independent of Committee sessions? If yes – why is this necessary?</i>  There does not seem to be any added value of holding physical working groups independent of Committee sessions, unless justified by very specific needs. The EUMS remain concerned about the additional resources that such organisation would require.</p>				
	4.2: Enhance capacity to arrive at consensus in standards setting process.	4.2.1: Improve the understanding of Codex Members and delegates of the importance of and approach to consensus building of Codex work.	Members and delegates awareness of the importance of consensus in the Codex standard setting process improved.	<ul style="list-style-type: none"> <li>- Training material on guidance to achieve consensus developed and made available in the languages of the Commission to delegates.</li> <li>- Regular dissemination of existing material to Members through Codex Contact Points.</li> <li>- Delegate training programs held in association with Codex meetings.</li> <li>- Impediments to consensus being achieved in Codex identified and analysed and additional guidance developed to address such</li> </ul>

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**Question to the Committee:**

*Is this activity relevant to the work of the Committee?*

Yes. Consensus-based decision making is enshrined in the Procedural Manual of the Codex Alimentarius and is particularly necessary for a global standard setting body such as Codex. It is incumbent on the chair of the Committee to explore all possible means to reach consensus before taking any final decision on progressing a standard. Where such attempts fail, the Procedural Manual provides for decisions to be taken on the basis of a vote. The EUMS recognise that CCGP is the appropriate place for any discussion on such matters in order to find a way to ensure Codex enjoys legitimacy, credibility and worldwide acceptance of its standards. The EUMS would encourage all members to participate in any such discussion.

*Are there problems with finding consensus in the Committee? If yes – what are the impediments to consensus? What has been attempted and what more could be done?*

There may be. Consensus may not be possible when opposing views are held by different members. Where efforts fail to unravel these differences, a decision should be taken as to whether the matter can be postponed, discontinued altogether or put to a vote. Members should be clear what the implications of each choice are and what the relevant timelines are. Only then should a decision, that represents the interests of the largest majority of members, be taken.