

## CODEX COMMITTEE ON GENERAL PRINCIPLES (CCGP)

### European Union comments on

### CL 2024/27-GP

### Request for proposals from Members and Observers on inconsistencies in language, and superseded content of the PM, apart from Section 3

#### *Member States Competence Member States Vote*

The Member States of the European Union (MSEU) would like to propose the following answers to:

**Question a)** Have you identified any language inconsistencies or translation errors in the PM? If so, can you be as specific as possible on the location of the inconsistency and its nature, and which language it concerns?

#### General comments

##### Numbering

To facilitate cross-referencing between different texts of the Procedural Manual (PM), we propose to apply an extra level of numbering to the different texts included in each section. As an example, Section 2 could be numbered as follows:

##### *Section 1. Basic texts and definitions*

- *Section 1.1. Statutes of the Codex Alimentarius Commission*
- *Section 1.2. Rules of procedures of the Codex Alimentarius Commission*
- *Etc.*

##### *Section 2. Elaboration of Codex standards and related texts*

- *Section 2.1. Procedures for the elaboration of Codex standards and related texts*
- *Section 2.2. Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission*
- *Etc.*

The same would apply to the remaining sections of the PM.

References should also be updated accordingly in the body of the text, e.g. Section 2, paragraph 10, page 26:

“Taking into account ~~Section 2~~ **Section 2.2**: Criteria for the establishment of work priorities, the strategic plan [...]”

Additionally, texts located at this second level of numbering could also be referred as “sub-sections” for the sake of clarity and distinction with the main sections of the Manual (first level of numbering).

##### Designations

Several entities are mentioned throughout the entire PM using different terms/designations. Such entities include in particular:

- Secretariat/Codex Secretariat / Joint FAO/WHO (Codex) Secretariat / Joint FAO/WHO Codex Secretariat. In order to facilitate the reading of the PM, it is proposed to use by default “Codex

Secretariat”. The official designation could be used only for the first reference, i.e. Joint FAO/WHO Codex Secretariat (hereafter “Codex Secretariat”) or in the list of abbreviations.

- Secretary of the Commission / Secretary of the CAC / Secretary, CAC, Joint FAO/WHO Food Standards Programme, FAO, Rome / Secretary. The PM could be reviewed in order to determine, on a case-by-case basis, whether it is necessary to refer to the Secretary or whether a reference to the Codex Secretariat is appropriate.
- Member / Codex Member / Member of the Commission / Member of the Codex Alimentarius Commission / Nation / Member Nation / Government.
- Coordinating committee / Regional coordinating committee
- Joint FAO/WHO Food Standards Programme / Codex Alimentarius / Codex

Unless some of these terms have a specific meaning in certain context, a single designation should be chosen for each entity and used consistently in the different parts of the PM.

### Acronyms

The use of acronyms lacks consistency throughout the PM. A harmonized approach should be established and applied in a consistent manner. We propose the following approach:

- A given name is fully spelled out only once per sub-section, when first used, and its acronym is indicated in brackets next to it.
- This acronym is then used in the rest of this sub-section until the next one.
- When a name is only used once in a given sub-section, the acronym is not mentioned and only the full name is used.

We also propose two exceptions to these rules to facilitate reading:

- The acronyms of FAO and WHO can be used directly without spelling out their names first in a new sub-section.
- The acronym CAC is not used and replaced by “the Commission”.

See the specific comments below for corrections made in accordance with this approach.

### Articles before acronyms

The use of articles (a, an, the) before acronyms also lacks consistency. Sometimes, some acronyms are accompanied by an article (the CCFA, the JECFA etc.), sometimes they are not (Ø CCFA, Ø JECFA).

It is common practice not to use articles before acronyms when used as nouns (“*CCFA may request JECFA...*”). In contrast, articles are used when acronyms are used as qualifiers (“*the JECFA evaluation...*”).

We also propose corrections to harmonize the use of these articles in the specific comments below.

**Specific comments**

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
Acronyms and abbreviations		X		GSCTFF General Standard for Contaminants and Toxins in Food and Feed	<del>GSCTFF General Standard for Contaminants and Toxins in Food and Feed</del>	The acronym GSCTFF is used only once in the entire Manual (see Section 4, paragraph 107, page 113). It is proposed to remove it and use the full name of the standard.
JEMNU		XI		Joint Expert Meeting on Nutrition	Joint <b>FAO/WHO</b> Expert Meeting on Nutrition	In line with the designation in para. 304, p154
Section 1. Basic texts and definitions	Rules of procedure of the Codex Alimentarius Commission RULE IV - Coordinators	11	3.a	to appoint the Chairperson of the coordinating committee where such committee has been set up under Rule XI.1(b)(II) for the region or group of countries concerned	to appoint the Chairperson of the coordinating committee where such committee has been set up under Rule XI.1(b)( <b>ii</b> ) for the region or group of countries concerned	typo
	Definitions for the purposes of the Codex Alimentarius	19		Codex maximum level for a contaminant in a food or feed commodity	Codex maximum level for a contaminant in a food or feed commodity ( <b>ML</b> )	
Section 2. Elaboration of	Procedures for the elaboration of	27	14 c) and d)	c) advice on the need for coordination of	c) advice on the need for coordination of	Letter c) and d) belong together

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
Codex Standards and related texts	<p>Codex standards and related texts</p> <p><i>Part 2 Critical review</i></p>			<p>work between relevant, d) Codex subsidiary bodies; e) advice on establishment and dissolution of committees and task forces, including ad hoc cross-committee task forces (in areas where work falls within several committee mandates); and f) preliminary assessment of the need for expert scientific advice and the availability of such advice from FAO, WHO or other relevant expert bodies, and the prioritization of that advice.</p>	<p>work between relevant, <del>d)</del> Codex subsidiary bodies; <del>ed)</del> advice on establishment and dissolution of committees and task forces, including ad hoc cross-committee task forces (in areas where work falls within several committee mandates); and <del>fe)</del> preliminary assessment of the need for expert scientific advice and the availability of such advice from FAO, WHO or other relevant expert bodies, and the prioritization of that advice.</p>	
	<p><i>Part 3 Uniform procedure for the elaboration of Codex standards and related texts</i></p>	28	Step 2	<p>the FAO Panel of Experts on Pesticide Residues in Food and the Environment and the WHO Core Assessment Group</p>	<p>the <b><u>Joint FAO/WHO Meeting on Pesticide Residues</u></b> (JMPR)</p>	<p>Current designation of JMPR, aligned with the one used in the definition of Codex MRL for pesticide residues in Section 1 (p19)</p>

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				on Pesticide Residues (JMPR)		
	<i>Part 4 Uniform accelerated procedure for the elaboration of Codex standards and related texts</i>	29	Step 2	the joint meetings of the FAO Panel of Experts on Pesticide Residues in Food and the Environment and the WHO Core Assessment Group on Pesticide Residues (JMPR), or the JECFA	the <del>joint</del> meetings of the <del>FAO Panel of Experts on Pesticide Residues in Food and the Environment and the WHO Core Assessment Group on Pesticide Residues (JMPR),</del> or the JECFA	JMPR's acronym has already been defined in the current sub-section. See general comments above on the use of acronyms and articles.
	Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission	33	33	When there is a proposal for the elaboration of a standard, code of practice or related text	When there is a proposal for the elaboration of a <u>Codex</u> standard; <del>code of practice</del> or related text	Footnote iii (p18) indicates that CoP are covered by the notion of related texts.
		33	33	or the revision of standards, codes of practice or other texts	or the revision of <u>Codex</u> standards; <del>codes of practice</del> or <del>other related</del> texts	
		33	35	The ad hoc intergovernmental task force shall report to the CAC	The ad hoc intergovernmental task force shall report to the <u>CAC Commission</u>	See general comments above.
	Criteria for the establishment of work priorities	34	40	When a Codex committee proposes to elaborate a standard, code of practice or related text	When a Codex committee proposes to elaborate a <u>Codex</u> standard; <del>code of practice</del> or related text	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	Relations between Commodity committees and general subject committees	37	55	Codex general subject committees which include the Committees on Food Labelling; Food Additives; Contaminants in Foods; Pesticides Residues; Residues of Veterinary Drugs in Foods; Food Hygiene; Methods of Analysis and Sampling; Nutrition and Foods for Special Dietary Uses; and Food Import and Export Inspection and Certification Systems	Codex general subject committees which include the Committees on Food Labelling ( <b>CCFL</b> ); Food Additives ( <b>CCFA</b> ); Contaminants in Foods ( <b>CCCF</b> ); Pesticides Residues ( <b>CCPR</b> ); Residues of Veterinary Drugs in Foods ( <b>CCRVDF</b> ); Food Hygiene ( <b>CCFH</b> ); Methods of Analysis and Sampling ( <b>CCMAS</b> ); Nutrition and Foods for Special Dietary Uses ( <b>CCNFSDU</b> ); and Food Import and Export Inspection and Certification ( <b>CCFICS</b> )	Consistent use of acronyms, see general comments above.
		38	57-58	the Committee on Food Labelling	<del>the Committee on Food Labelling</del> <b>CCFL</b>	
		38 - 39	59 - 65	The CCFA	<del>The</del> CCFA	Consistent use of articles before acronyms, see

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
						general comments above.
		38	62	on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives concerning the safety-in-use	on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives <b>(JECFA)</b> concerning the safety-in-use	
		38	63	the ADI assigned by the Joint FAO/WHO Expert Committee on Food Additives	the ADI assigned by <del>the Joint FAO/WHO Expert Committee on Food Additives</del> <b>JECFA</b>	
		39	67 - 70	a proposal should be prepared and forwarded to the Committee on Contaminants in Foods for consideration	a proposal should be prepared and forwarded to <del>the Committee on Contaminants in Foods</del> <b>CCCF</b> for consideration	
		39	71	provisions on residue limits of pesticides and of veterinary drugs adopted by the CAC	provisions on residue limits of pesticides and of veterinary drugs adopted by the <del>CAC</del> <b>Commission</b>	
		39	72	forwarded to the Committees on Pesticide Residues or on Residues of Veterinary Drugs in	forwarded to <del>the Committees on Pesticide Residues</del> <b>CCPR</b> or <del>on Residues of Veterinary Drugs in</del>	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				Foods as appropriate	Foods <b>CCRVDF</b> as appropriate	
		40	73	Commodity committees should examine the provisions on food hygiene adopted by the CAC	Commodity committees should examine the provisions on food hygiene adopted by the <b>CAC Commission</b>	
		40	73	general reference above to the Committee on Food Hygiene for endorsement	general reference above to <del>the Committee on Food Hygiene</del> <b>CCFH</b> for endorsement	
		40 - 41	74 - 84	these should be referred to the Committee on Methods of Analysis and Sampling at Step 4	these should be referred to <del>the Committee on Methods of Analysis and Sampling</del> <b>CCMAS</b> at Step 4	
		41	82	The Committee on Food Additives is responsible	<del>The Committee on Food Additives</del> <b>CCFA</b> is responsible	
		41	83	The Committees on Pesticide Residues and Residues of Veterinary Drugs in foods	<del>The Committees on Pesticide Residues and Residues of Veterinary Drugs in foods</del> <b>CCPR</b> and <b>CCRVDF</b>	
		41	84	the Committee on Food Hygiene	<del>the Committee on Food Hygiene</del> <b>CCFH</b>	



Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		42	85	developed by the Committee on Food Import and Export Inspection and Certification Systems	developed by the <del>Committee on Food Import and Export Inspection and Certification Systems</del> <b>CCFICS</b>	
	Format for Codex Commodity standards	42	86	the subsidiary bodies of the CAC	the subsidiary bodies of the <del>CAC</del> <b>Commission</b>	
		43	92	general reference to the corresponding sections of the GSFA	general reference to the corresponding sections of the <b><u>General Standard for Food Additives (GSFA) (CXS 192-1995)<sup>2</sup></u></b>	
		44	96	This section should contain only the following reference to the General Standard for Contaminants and Toxins in Food and Feed <sup>3</sup>	This section should contain only the following reference to the General Standard for Contaminants and Toxins in Food and Feed <b><u>(CXS 193-1995)<sup>3</sup></u></b>	
	Guidelines for the inclusion of specific provisions in Codex standards and related texts	46	109	The General Standard for Food Additives (GSFA) <sup>2</sup>	The General Standard for Food Additives (GSFA) <b><u>(CXS 192-1995)<sup>2</sup></u></b>	
		46	112	The food additive provisions of the GSFA may be revised by the	The food additive provisions of the GSFA may be revised by the	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				Committee on Food Additives after requests submitted by Codex committees, Codex Members, or the CAC.	<b>Codex</b> Committee on Food Additives ( <b>CCFA</b> ) after requests submitted by Codex committees, Codex Members, or the <b>CAC Commission</b> .	
		46 - 50	112 - 128	the Committee on Food Additives	<del>the Committee on Food Additives</del> <b>CCFA</b>	
		46	112(b)	a summary of the JECFA safety evaluation of the food additive	a summary of the <b>Joint FAO/WHO Expert Committee on Food Additives</b> (JECFA) safety evaluation of the food additive	
		46	113(a)	For additives with a numerical ADI	For additives with a numerical <b>acceptable daily intake (ADI)</b>	
		52	131	The <i>General Principles of Food Hygiene</i> <sup>7</sup> (including the Guidelines for the Application of the Hazard Analysis Critical Control Point (HACCP) System) and the <i>Principles and Guidelines for the Establishment</i>	The <i>General Principles of Food Hygiene</i> ( <b>CXC 1-1969</b> ) <sup>7</sup> (including the Guidelines for the Application of the Hazard Analysis Critical Control Point (HACCP) System) and the <i>Principles and Guidelines for</i>	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				<i>and Application of Microbiological Criteria Related to Foods</i> <sup>8</sup> are the base documents in the field of food hygiene.	<i>the Establishment and Application of Microbiological Criteria Related to Foods</i> <sup>8</sup> are the base documents in the field of food hygiene.	
	Procedure for the inclusion of additional species in Codex standards for fish and fishery products	52	135 - 162	the CAC	the <del>CAC</del> <b><u>Commission</u></b>	
		52	135 - 136	the CCFFP	<del>the</del> CCFFP	
	Principles for the establishment of Codex methods of analysis	58	177 - 206	the CCMAS	<del>the</del> CCMAS	
	Principles for the establishment or selection of Codex sampling procedures	67 -68	?	(All text)	(All text)	The paragraphs of this sub-section are not numbered. This should be corrected.
		67 -68	?	The CCMAS	<del>The</del> CCMAS	
	Provisions on the use of proprietary methods in Codex standards	70	219	Codex committees may occasionally submit methods of analysis which are proprietary, or are based on proprietary aspects, to the CCMAS for endorsement.	Codex committees may occasionally submit methods of analysis which are proprietary, or are based on proprietary aspects, to the <b><u>Codex Committee on</u></b>	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
					<b><u>Methods of Analysis and Sampling</u></b> (CCMAS) for endorsement.	
Section 4 Risk analysis	Working principles for risk analysis for application in the framework of the Codex Alimentarius	99	2	The objective of these working principles is to provide guidance to the Codex Alimentarius Commission (CAC) and the Joint FAO/WHO expert bodies and consultations	The objective of these working principles is to provide guidance to the Codex Alimentarius Commission <del>(CAC)</del> , <b><u>hereinafter referred to as “the Commission”</u></b> , and the Joint FAO/WHO expert bodies and consultations	For consistency with Sections 1 and 2
		99 - 103	3 – 41	The CAC	The <del>CAC</del> <b><u>Commission</u></b>	
		102	29	MLs	<del>MLs</del> <b><u>maximum levels</u></b>	
	Risk analysis principles applied by the Codex Committee on Food Additives	105	42	This document addresses the application of risk analysis principles by the Codex Committee on Food Additives (CCFA) and the JECFA.	This document addresses the application of risk analysis principles by the Codex Committee on Food Additives (CCFA) and the <b><u>Joint FAO/WHO Expert Committee</u></b>	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
					<b><u>on Food Additives (JECFA).</u></b>	
		106 - 108	48 - 64	the CAC	the <del>CAC</del> <b><u>Commission</u></b>	
		106	51	in the preamble and relevant annexes of the Codex GSFA. <sup>2</sup>	in the preamble and relevant annexes of the <del>Codex</del> <b><u>General Standard for Food Additives (GSFA) (CXS 192-1995).</u></b> <sup>2</sup>	
		107	56	When establishing its standards, codes of practice, and guidelines	When establishing its standards, <del>codes of practice, and</del> <b><u>guidelines and related texts</u></b>	
	Risk analysis principles applied by the Codex Committee on Contaminants in Foods	109	76	This document addresses the applications of risk analysis principles by the Codex Committee on Contaminants in Foods (CCCF) and the JECFA.	This document addresses the applications of risk analysis principles by the Codex Committee on Contaminants in Foods (CCCF) and the <b><u>Joint FAO/WHO Expert Committee on Food Additives (JECFA).</u></b>	
		109 - 112	79 – 98	The CAC	The <del>CAC</del> <b><u>Commission</u></b>	
		110	88	MLs	<b><u>Maximum Levels (MLs)</u></b>	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		111	90	<i>Codex General Standard for Contaminants and Toxins in Food and Feed</i> (CXS 193-1995).	<i>Codex General Standard for Contaminants and Toxins in Food and Feed</i> (CXS 193-1995). <sup>3</sup>	Cross-reference note number 3 should be added.
		111	91	When establishing its standards, codes of practice, and guidelines,	When establishing its standards, <del>codes of practice, and guidelines,</del> <b>and related texts</b>	
	Policy of the Codex Committee on Contaminants in Food for Exposure Assessment of Contaminants and Toxins in Foods or Food Groups	113	107	The preamble of the GSCTFF	The preamble of the <del>GSCTFF</del> <b><u>Codex General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995)</u></b> <sup>3</sup>	This acronym is only used once here in the entire Manual, apart from the list of acronyms and abbreviations where it should also be removed (page X)
		113	109	The purpose of this section is to outline steps in contaminant data selection and analysis undertaken by JECFA	The purpose of this section is to outline steps in contaminant data selection and analysis undertaken by <b><u>the Joint FAO/WHO Expert Committee on Food Additives</u></b> <del>JECFA</del>	
		113	110	Exposure assessments of contaminants and	Exposure assessments of contaminants and	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				toxins in foods are performed by JECFA at the request of CCCF	toxins in foods are performed by JECFA at the request of <b><u>the Codex Committee on Contaminants in Foods (CCCF)</u></b>	
		114	116	The CCCF determines criteria for selecting foods/food groups	The CCCF determines criteria for selecting foods/food groups	
	Risk analysis principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods	116 - 120	124 - 153	the CAC	the <b><u>CAC Commission</u></b>	
		116	124	the JECFA	the <b><u>Joint FAO/WHO Expert Committee on Food Additives (JECFA)</u></b>	
		116 - 121	125 - 157	The CCRVDF	The CCRVDF	
		117	135	in accordance with WTO agreement	in accordance with <b><u>WTO the World Trade Organization</u></b> agreement	This acronym is not used in the rest of this section.
		119	142	a temporary ADI	a temporary <b><u>acceptable daily intake (ADI)</u></b>	
	Risk assessment policy for residues	126	159	to advice requests from the CCRVDF	to advice requests from the <b><u>Codex</u></b>	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	of veterinary drugs in foods				<b><u>Committee on Residues of Veterinary Drugs in Foods (CCRVDF)</u></b>	
		126	159(a)	JECFA should use its risk assessment process for establishing acute reference doses (ARfD) or ADIs and proposing MRLs	JECFA should use its risk assessment process for establishing acute reference doses (ARfD) or <b><u>admissible daily intakes (ADIs)</u></b> and proposing <b><u>maximum residue limits (MRLs)</u></b>	
		126 -	159(a) – 159(h)	the CCRVDF	<del>the CCRVDF</del>	
		126	159(f)	a harmonized approach between JECFA and the JMPR	a harmonized approach between JECFA and the <b><u>JMPR Joint FAO/WHO Meeting on Pesticide residues</u></b>	This acronym is not used in the rest of this section.
	Risk analysis principles applied by the Codex Committee on Pesticide Residues	127 - 140	166 - 253	the CAC	the <del>CAC</del> <b><u>Commission</u></b>	
		127 - 141	167 - 265	the JMPR	<del>the JMPR</del>	Unless “JMPR” is used as a qualifier (e.g. “ <i>the JMPR risk assessment</i> ”)



Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		127 - 142	167 - 268	the CCPR	the CCPR	Unless “CCPR” is used as a qualifier (e.g. “ <i>the CCPR session</i> ”)
		127	167	in consultation with the JMPR joint secretaries	in consultation with the JMPR <del>joint secretaries</del> <b>Secretariat</b>	Harmonization of wording
		128	168	estimating an ADI and an ARfD	estimating an <b><u>admissible daily intake (ADI)</u></b> and an <b><u>acute reference dose (ARfD)</u></b>	
		128	169	The FAO Panel of Experts on Pesticide Residues in Food and the Environment considers data on registered use patterns, fate of residues, animal and plant metabolism, analytical methodology and residue data derived from supervised residue trials in order to propose residue definitions and maximum residues levels for	The FAO Panel of Experts on Pesticide Residues in Food and the Environment considers data on registered use patterns, fate of residues, animal and plant metabolism, analytical methodology, <b><u>environmental studies as necessary or requested by risk managers,</u></b> and residue data derived from supervised residue trials in	JMPR often looks to environmental data, e.g. in case of rotational crop studies to make use of Dt50 values.

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				the pesticide in food and feed.	order to propose residue definitions and maximum residues levels for the pesticide in food and feed.	
		129	181	Where the exposure of livestock to pesticides through feeds leads to residues at the LOQ	Where the exposure of livestock to pesticides through feeds leads to residues at the <b><u>limit of quantification (LOQ)</u></b>	
		129	182	recommended by JMPR or the JECFA	recommended by JMPR or the <b><u>Joint FAO/WHO Expert Committee on Food Additives JECFA.</u></b>	This acronym is not used in the rest of this section.
		132	207	submit these data to the WHO	submit these data to <del>the</del> WHO	
		133	216	requests the re-establishment of the EWG on priorities	requests the re-establishment of the <b><u>electronic working group (EWG)</u></b> on priorities	
		135	226	c) commitment by the Member/Observer to provide supporting data for revcew with a firm date for data submission;	c) commitment by the Member/Observer to provide supporting data for <del>revcew</del> <b><u>review</u></b> with a firm date for data submission;	Typo

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		137	240(c)	the availability of current labels (authorized GAP)	the availability of current labels ( <del>authorized</del> <b>authorized GAP</b> )	Typo
		138	244	the JMPR Joint Secretariat	the JMPR <del>Joint</del> Secretariat	Harmonization of wording
		140	261	the JMPR Secretaries	the JMPR <del>Secretaries</del> <b>Secretariat</b>	
	Nutritional risk analysis principles and guidelines for application to the work of the Codex Committee on Nutrition and Foods for Special Dietary Uses	149	272	to provide guidance to the Codex Alimentarius Commission (CAC) and the Joint FAO/WHO expert bodies	to provide guidance to the Codex Alimentarius Commission ( <del>CAC</del> ), <b>hereinafter referred to as “the Commission”</b> , and the joint FAO/WHO expert bodies	
		149 - 154	272 - 304	the CAC	the <del>CAC</del> <b>Commission</b>	
		149	275	the work of the Committee on Nutrition and Foods for Special Dietary Uses	the work of the <del>Committee on Nutrition and Foods for Special Dietary Uses</del> <b>CCNFSDU</b>	
	Risk analysis principles and procedures applied by the Codex Committee on Food Hygiene	155 - 159	308 - 335	The CCFH	<del>The</del> CCFH	
		156 - 159	312 - 334	the CAC	the <del>CAC</del> <b>Commission</b>	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
Section 6. Membership	Core functions of Codex contact points	181		The numbering starts at 10	The numbering should start at 1	Typo
Section 7. Relations with other organizations	Guidelines on cooperation between the Codex Alimentarius Commission and international intergovernmental organizations in the elaboration of standards and related texts	185	1	These guidelines establish the modalities of cooperation between the Codex Alimentarius Commission (CAC) and international intergovernmental organizations	These guidelines establish the modalities of cooperation between the Codex Alimentarius Commission <del>(CAC)</del> , <b>hereinafter referred to as “the Commission”</b> , and international intergovernmental organizations	
		185 - 186	3 - 13	The CAC	The <del>CAC</del> <b>Commission</b>	
	Principles concerning the participation of international non-governmental organizations in the work of the Codex Alimentarius Commission	187 - 190	14 -30	the CAC	the <del>CAC</del> <b>Commission</b>	
		189	26(e)	to the Secretary	to the Secretary <b>of the Commission</b>	Harmonization with previous uses. This designation could also be replaced by the Codex secretariat if appropriate (see

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
						general comments above).
		189	27(b)	in cooperation with the Secretariat	in cooperation with the <b>Codex</b> Secretariat	
	Annex: Information required of international non-governmental organizations requesting observer status	191	4 - 12	the CAC	the <del>CAC</del> <b>Commission</b>	
		191	10	the regional coordinating committees and/or the national CCPs	the regional coordinating committees and/or the national <del>CCPs</del> <b>Codex contact points</b>	

**Question b) Is there any content of the PM, apart from in Section 3, that you consider superseded and that would need a review, and why?**

**General comments**

The MSEU support a review of Section 2 “Procedures for the elaboration of Codex standards and related texts – Part 2: Critical review” in conjunction with Section 2 “Criteria for the establishment of work priorities” (the Criteria) and “Guidelines on the application of the criteria for the establishment of work priorities (criteria applicable to commodities)”.

*Rationale:* The way the content of Part 2 is presented and cross-referenced to the Criteria is not user-friendly and neither conducive to the critical review of new work by Members of CCEXEC nor to the actual preparation of proposals for new work (in the form of “project documents”) or their prioritization at committee level. The content and structure of those sections is also very likely to be superseded following the consideration of comprehensive guidance on new work and work prioritization (under preparation by the Codex Secretariat).

For example: Part 2: Critical Review requires the project document to contain “f) *information on the relation between the proposal and other existing Codex documents as well as other ongoing work*” and advises countries in a footnote (iv) that assistance could be sought from the Codex Secretariat to provide such information. Furthermore, in letter “d) *an assessment against the Section 2: Criteria...*” is required. In the criteria applicable to commodities, a quasi-duplication of f) can be found under letter “e) *coverage of the main consumer protection and trade issues by existing or proposed general standards*”. In the Guidelines on the application of this criteria (which only exist for commodities) the advice that Members may seek assistance from the Codex Secretariat in responding to the criteria is omitted.

Furthermore, it is not clearly visible which criteria are exclusively applicable to commodities. For some Codex standards/texts, it may also not be fully clear whether only criteria applicable to general subjects or those applicable to commodities should be complied with (e.g. CCNFDSU is general subject committee that may develop commodity or general subject standards).

An additional specific comment is made in relation to the “Part 2: Critical Review” requirement 12. i) on the proposed timeline in project documents.

Adoption at Step 5/8

The uniform step-process described in Section 2 lacks an explicit mention of an adoption at “Step 5/8”, as this modality is now used on a regular basis to expedite the approval standards or parts of standards. While Section 4 (Risk analysis) establishes a “Step 5/8-procedure” (paragraphs 246-251), it is only applicable to the adoption of pesticide MRLs.

We understand that paragraph 6 of Section 2 forms the procedural basis for an adoption at Step 5/8: “*The Commission may authorize, on the basis of two-thirds majority of votes cast, the omission of Steps 6 and 7, where such an omission is recommended by the Codex committee entrusted with the elaboration of the draft. [...] When formulating recommendations to omit Steps 6 and 7, Codex committees shall take all appropriate matters into consideration, including the need for urgency, and the likelihood of new scientific information becoming available in the immediate future.*”

However, this description no longer fully corresponds to the current use of an adoption at Step 5/8 as i) consensus is the basis in our decision-making process, and ii) it is mostly motivated by flexibility reasons rather than urgency or scientific aspects.

We suggest that this paragraph and the Uniform procedure (Part 3) be re-drafted to better reflect the current practices. Consequential amendments of other parts of the Manual may also be needed and should be considered.

Working groups established under the Commission

The Procedural Manual does not explicitly mention the possibility for the Commission to establish EWGs under its responsibility. The *Guidelines on electronic working groups* (Section 3), only mention EWGs as being established by Codex committees.

This possibility could be either added in the *Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission* (Section 2), or the *Guidelines on electronic working groups* (Section 3), or both.

#### Core function of CCPs

*Core functions of Codex contact points* (Section 6) is outdated, especially paragraphs 12 and 17 as Codex texts and working documents are now exclusively online. Paragraph 16 (registration to Codex meetings) is not aligned with paragraph 14 of Section 3: *Guidelines to host governments of Codex committees and ad hoc intergovernmental task forces* currently under review by host secretariats. In-depth revision of this text would be welcome.

Furthermore, following the recommendation of CCGP33 and the decision of CAC46 to move the section on Membership from the Procedural Manual to the Codex website, the *Core functions of Codex contact points* would remain the only text in Section 6: Membership. A new location for this text should be reflected upon.

#### Work by correspondence

In light of the experience of the use of virtual meetings and the recognition that they are useful tool that are now available to progress Codex work, the EUMS suggest to proceed to an in-depth review of the modality and the relevance of working by correspondence.

#### Adaptation to the current working modalities

The use of the Online Commenting System (OCS) has modified the organisation of Codex work in a way that is not always accurately reflected in the Procedural Manual.

**Specific comments**

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
Section 2. Elaboration of Codex Standards and related texts	Procedures for the elaboration of Codex standards and related texts  <i>Part 2 Critical review</i>	26	12(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.	the proposed timeline for completion of the new work, including the start date, <b><u>the number of sessions foreseen to develop the standard and the year of finalisation;</u></b> <del>the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission;</del> the time frame for developing a standard should not normally exceed five years <b><u>and contain an indication of the session of the Commission approving the work and finally adopting the standard or related text.</u></b>	The time frame is now determined in reference to sessions of the Commission and/or the concerned subsidiary body. The proposed date for adoption at Step 5 is not usually stated.



Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		28	19(b)(ii)	to ensure that the requirements of the endorsement procedure have been fulfilled, where appropriate;	<del>to ensure that the requirements of the endorsement procedure have been fulfilled, where appropriate;</del>	This “endorsement procedure” is only mentioned here in the entire Manual. It may be a leftover from the former “acceptance procedure” that was removed from the 15th edition of the Manual. In any case, this provision should be removed.
	<i>Part 3 Uniform procedure for the elaboration of Codex standards and related texts &amp; Part 4 Uniform accelerated procedure for the elaboration of Codex standards and related texts</i>	28 & 30	Step 3	The proposed draft standard is sent to Members of the Commission and interested international organizations	The proposed draft standard is sent <b>by the Codex Secretariat</b> to Members of the Commission and interested international organizations	The role of the Codex secretariat in transmitting the proposed draft standard could be added.
	<i>Part 6 Subsequent procedure concerning publication and possible extension of territorial application of the standard</i>	30	Title	<i>Subsequent procedure concerning publication and possible extension of territorial application of the standard</i>	<i>Subsequent procedure concerning <del>publication and</del> possible extension of territorial application of the standard</i>	See comment below

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		30	22	The Codex regional standard is published and issued to all Members and Associate Members of FAO and/or WHO and to the international organizations concerned.	<del>The Codex regional standard is published and issued to all Members and Associate Members of FAO and/or WHO and to the international organizations concerned.</del>	Paragraph 22 is redundant with paragraph 20, which applies equally to global and regional standards. It does not provide specific provisions for regional standards to be published differently from worldwide Codex standards. It is proposed to suppress this paragraph and remove the reference to publication in the title of part 6.
		31	23(b)(ii)	When the relevant commodity committee is not active: When the commodity committee concerned is not active (i.e. not holding physical sessions), the proposal for conversion of a regional standard	When the relevant commodity committee is not active: <del>When the commodity committee concerned is not active (i.e. not holding physical sessions),</del> the proposal for conversion of a regional standard	Redundant, and committees can still be active while not holding physical sessions (e.g. committees working by correspondence, or virtual sessions of committees).

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	Principles for the establishment or selection of Codex sampling procedures	68	Last paragraph	Methods of analysis which have already been printed as official methods of analysis in other available publications	Methods of analysis which have already been <del>printed</del> <b>published</b> as official methods of analysis in other available publications	Obsolete term.
Section 4 Risk analysis	Risk analysis principles applied by the Codex Committee on Pesticide Residues	133	218	<p>The schedules and priority lists are provided in the following tables:</p> <p>a) Table 1 – CCPR proposed schedule and priority lists of pesticides (new pesticides, new uses, and other evaluations).</p> <p>b) Table 2A – Schedule and priority lists of periodic reviews.</p> <p>c) Table 2B – Periodic review list (pesticides that have been last evaluated 15 years ago or more, but not yet scheduled or</p>	<p>The schedules and priority lists are provided in the following tables:</p> <p>a) Table 1 – CCPR proposed schedule and priority lists of pesticides (new pesticides, new uses, and other evaluations).</p> <p>b) Table 2A – Schedule and priority lists of periodic reviews.</p> <p>c) Table 2B – Periodic review list (pesticides that have been last evaluated 15 years ago or more, but not yet scheduled or</p>	<p>The management of unsupported compounds is now a recurring item on the agenda of CCPR. CCPR54 (2023) notably adopted an information document for the management of unsupported compounds, and the schedules and priority lists for JMPR now include a 5<sup>th</sup> table dedicated to such compounds.</p>

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				<p>listed, 15-year rule).</p> <p>d) Table 3 – Record of periodic review.</p> <p>e) Table 4 – Pesticide/Food combinations for which specific GAP is no longer supported.</p>	<p>listed, 15-year rule).</p> <p>d) Table 3 – Record of periodic review.</p> <p>e) Table 4 – Pesticide/Food combinations for which specific GAP is no longer supported.</p> <p>f) <b><u>Table 5 – Unsupported compounds</u></b></p>	
		134	220	In early September of each year, the EWG Chair will issue a broadcast email to Members/Observers	In early September of each year, the EWG Chair will issue a <del>broadcast email</del> <b><u>message</u></b> to Members/Observers	The EWG on priorities operate on the EWG forum. As such, the request for new compounds is not done anymore by an email. The word message is inclusive of all types of communication.
Section 7. Relations with other organizations	Principles concerning the participation of international non-governmental organizations in the work of the Codex	189	26(a)	An organization in observer status: a) shall be entitled to send an Observer (without the right to vote) to	An organization in observer status: a) shall be entitled to send an Observer (without the right to vote) to	Non applicable anymore as working documents and discussion papers are made available to Members,

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	Alimentarius Commission			sessions of the Commission, who may be accompanied by advisers; to receive from the Secretary of the Commission, in advance of the session, all working documents and discussion papers; to circulate to the Commission its views in writing, without abridgement; and to participate in discussions when invited by the Chairperson	sessions of the Commission, who may be accompanied by advisers; <del>to receive from the Secretary of the Commission, in advance of the session, all working documents and discussion papers;</del> to circulate to the Commission its views in writing, without abridgement; and to participate in discussions when invited by the Chairperson	Observers and public through the Codex website and are not directly distributed.
		189	26(b)	b) shall be entitled to send an Observer (without the right to vote) to sessions of specified	b) shall be entitled to send an Observer (without the right to vote) to sessions of specified	

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				<p>subsidiary bodies, who may be accompanied by advisers; to receive from the secretariats of the subsidiary bodies, in advance of the session, all working documents and discussion papers; to circulate to these bodies its views in writing, without abridgement; and to participate in discussions when invited by the Chairperson</p>	<p>subsidiary bodies, who may be accompanied by advisers; <del>to receive from the secretariats of the subsidiary bodies, in advance of the session, all working documents and discussion papers;</del> to circulate to these bodies its views in writing, without abridgement; and to participate in discussions when invited by the Chairperson</p>	
			26(c)	<p>c) may be invited by the Directors-General to participate in meetings or seminars on subjects</p>	<p>c) may be invited by the Directors-General to participate in meetings <del>or seminars</del> on subjects organized under</p>	<p>Seminars are only mentioned in this paragraph in the entire Manual and have no definition. This term is not used on a regular</p>

Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				<p>organized under the Joint FAO/WHO Food Standards Programme which fall within its fields of interest, and if it does not so participate, it may submit its views in writing to any such meeting or seminar</p>	<p>the Joint FAO/WHO Food Standards Programme which fall within its fields of interest, and if it does not so participate, it may submit its views in writing to any such meeting <del>or seminar</del></p>	<p>basis in Codex work.</p>
	<p>Annex: Information required of international non-governmental organizations requesting observer status</p>	<p>191</p>	<p>13</p>	<p>Languages (English, French or Spanish) in which documentation should be sent to the INGO.</p>	<p>Languages <del>(English, French or Spanish) in which documentation should be sent to the INGO.</del></p>	<p>Non applicable anymore</p>

