

30/11/01

EUROPEAN COMMUNITY COMMENTS

IMPLEMENTATION OF THE CODEX ALIMENTARIUS COMMISSION'S DECISIONS ON THE STRATEGIC FRAMEWORK

DRAFT MEDIUM TERM PLAN FOR 2003-2007 AND CHAIRPERSON'S ACTION PLAN

(Codex Circular Letter CL 2001/26-EXEC)

The Codex Secretariat in the document CX/EXEC 01/49/2 invited Governments and interested international organisations to comment on the revised Draft Medium Term Plan and also invited to propose or suggest new activities for the revised Draft Medium-Term Plan for 2003-2007.

Comments:

Objective 1 "Promoting sound Regulatory Framework"

ID 4

The clarification of the division of tasks between the horizontal Committees on one hand and the vertical commodity Committees on the other hand appears important for example for additives. Contradiction and duplication of work must be avoided. Where relevant, a reduction of the number of committees and meetings particularly helps developing countries to spend their tight financial resources effectively on essential Codex Work.

ID 25

The European Community suggests using the term "modern biotechnology" already used by CCFL. To further improve on clarity, adding the words "genetic modification/genetic engineering" between brackets should be considered.

ID 28

The European Community supports the Secretariat's assessment that this work is not a task for Codex and suggests its deletion from the Work Programme.

Objective 2 “Promoting Wide and Scientific Application of Scientific Principles and Risk Analysis”

ID 11

The expansion of the work of the appropriate Committees for residue questions to products and residues, which are particularly important for developing countries appears long overdue and very welcome. The absence of MRLs for these products represents indirectly a large barrier to trade for many developing countries. The pending work should be very much supported and co-ordinated by initiatives for example of the European Union within the framework of the Pesticide Initiative Programme (PIP).

ID 1

The European Community believes that improving risk communication with consumers is a key feature of building trust in the food chain and in the international standards.

ID 20

For many countries the absence of data on dietary intake represents a large problem within the framework of the risk assessment. Therefore, this activity is to be welcomed.

However, the reference to the activity number 1 appears incomprehensible.

Objective 3 “Promoting Linkages of between Codex and other multilaterally Regulatory Instruments and Conventions”

ID 12,13, 32, 34 and 8

The development on the linkages of the activities and regulations of Codex Alimentarius, the International Plant Protection Convention, the Office International des Epizooties and other relevant international bodies and conventions is very welcomed. Thereby, duplication of work is avoided or reduced and consistency in the international standards is reached.

The association of the activity 12 and the activity 7 does not appear understandable. It is probably more associated with ID 8 instead of 7.

ID 8

The European Community suggests replacing the last word “outputs” by “international standards”.

Objective 4 “ Enhance capacity to respond effectively and expeditiously to new issues, concerns and development in the food sector.”

ID 3

While agreeing with the overall aim of improving the speed of decision-making within Codex, the European Community believes that it is important to ensure that standards are agreed by consensus. We are familiar with issues becoming stuck within

the Codex Step procedure. However the problem is often not with the procedure, but with the inability of the Commission to find a solution that all countries can accept.

The European Community would prefer this Activity to be redrafted to read :

“Evaluate the Uniform Procedure for the Elaboration of Codex Standards and Related Texts against the aim of enabling adoption of texts by consensus or at least by a 2/3 majority (or agreeing to discontinue work) within a maximum of five years, and revise if necessary.”

ID 5

To be consistent with ID 11, the European Community suggests adding “and limits for contaminants” after “veterinary drugs”. The link between ID 11 and ID 5 should be considered.

Objective 5 “Promoting maximum Membership and Participation”

ID 14

This activity appears particularly important and meaningful, in order to integrate the developing countries more in Codex work and to offer to their positions a better forum. It should be welcomed expressly.

ID 29

The European Community believes that an ideal position would be to have national delegations of government representatives only, with interested parties attending in their respective INGOs. This would add transparency to Codex. It would also help counter accusations of industry bias in Codex due to the presence of industry representatives on national delegations and the large number of industry INGOs present at meetings. Codex should also encourage and facilitate attendance of the public to observe Codex meetings.

The European Community agrees that consumer/public interest INGOs do experience difficulties in attending Codex meetings due to financial and other constraints. Codex should focus its efforts in increasing attendance of these groups. Therefore we believe that the objective should be redrafted to read:

“Quantifiable increases of 20% of international consumer/public interest NGOs, and of members of the public, at Codex meetings.”

Objective 6: “Promoting Maximum Application of Codex Standards”

ID 23 and ID 10

The European Community supports the Secretariat’s view that these tasks are not really actionable by the Codex.

New Activities

1. The 24th Session of the Codex Alimentarius Commission confirmed the initial mandate of the Committee on General Principles to complete the principles for risk analysis within Codex as a high priority, with a view to their adoption in 2003. It also agreed that the Committee should develop guidance to governments subsequently or in parallel, as appropriate in view of its programme of work (Alinorm 01/41, para 81,83).

Accordingly, the European Community would like to propose the addition of the following new activity in the revised Draft Medium-Term Plan 2003-2007:

- *Short description:* Establish international guidelines for the implementation by the governments of risk analysis principles and for the use of precaution when scientific data are insufficient or incomplete. These guidelines are needed to help member governments in setting national standards and to avoid the misuse of precaution such that it gives rise to arbitrary or unjustifiable restriction on international food trade.
 - *Linkage to Strategic Framework:* Strategic Objective 2 (Promoting Widest and Consistent Application of Scientific Principles and Risk Analysis).
 - *Programme Area:* Standards Development.
 - *Committee responsible:* Codex Committee on General Principles
 - *Time limited:* Begin: Prior work and End: 2005
2. The European Community would like to propose the following new activity related to the dietary intake of pesticide residues.

The methods for predicting dietary intakes are currently either deterministic or probabilistic. While the deterministic model is relatively simple to apply, there is more controversy with respect to how the probabilistic models should be developed and used. The probabilistic models are very powerful and generally recognised as being the more accurate methodology, but there is a need for some general international guidance to be put in place to define acceptable procedures for developing and using this type of model. The Codex would be the ideal organisation to co-ordinate and harmonise work in this area.

Short description:

The “Guidelines for predicting dietary intake of pesticide residues (revised)”, WHO 1997, deals with long-term and short-term hazards posed by pesticide residues. In the meantime, a lot of experience with short-term hazards posed by pesticide residues was gained by the JMPR being shortly summarised in the JMPR Report 2000. For the use on the international level it is necessary that this experience be incorporated in updated guidelines including work on ARfD and portions.

- Linkage to the Strategic Framework (indicate Strategic Objective):
Objective 4: Enhance Capacity to Respond Effectively and Expeditiously to New Issues, Concerns and Developments in the Food Sector.
 - Programme Area:
Standards development
 - Committee, Task Force or other body responsible for delivering the work: JMPR/CCPR
 - Whether on-going or time limited and in the latter case, start and end dates: Start 2003 – 2005
Some intersection with activity 20 so that start and end may be shifted for 2 years but it is preferred to start as early as possible.
3. The European Community would like to propose that the extension of the work period of the *Ad Hoc* Intergovernmental Codex Task Force on Animal Feeding should be included in the Medium term plan 2003-2007 for the following reasons:

The Task Force is developing a Code of practice on Good Animal Feeding that is expected to be finalised by the end of the above-referred period. Nevertheless, other aspects related to animal feeding included in parts (b) and (c) of the terms of reference hereunder referred, which are important to food safety, cannot be addressed by the Task Force due to time constraints. Consequently, the period for this Task Force should be extended 4 years more.

“Short description: The 23rd Session of the Codex Alimentarius agreed to establish *Ad Hoc* Intergovernmental Codex Task Force on Animal Feeding for a limited period (4 years expiring in 2003) under closely defined terms of reference:

(a) To complete and extend the work already done by relevant Codex Committees on the Draft Code of Practice on Good Animal Feeding.

(b) To address other aspects which are important for food safety, such as problems related to toxic substances, pathogens, microbial resistance, new technologies, control measures, traceability etc.

(c) To take into account of and collaborate with, as appropriate, work carried out by relevant Codex Committees, in particular CCMAS, and other relevant international bodies, including FAO, WHO, OIE, and IPPC.

Linkage to the strategic objective: Objective 1 “Promoting sound and regulatory framework”.

Status: time limited

Begin: the first meeting of the Task Force started in 15 June 2000

End : 2007