

**Codex Committee on Food Import and Export Inspection and Certification  
Systems (25<sup>th</sup> Session)**

**European Union comments on**

**Codex Circular Letter CL 2020/02-FICS:**

**Request for Comments at Step 3 on the Proposed Draft Guidelines on  
recognition and maintenance of equivalence of National Food Control  
Systems (NFCS)**

**(CX/FICS 20/25/6)**

*Mixed Competence  
European Union Vote*

The European Union and its Member States (EUMS) would like to thank New Zealand, the United States and Chile for leading the work on systems equivalence.

The EUMS support the proposed draft guidelines as presented in Appendix 1 of CX/FICS 20/25/6 with the following comments:

**Paragraph 10, 2nd bullet:**

The text in square brackets should be deleted [~~with international standards~~].

*Rationale:* the bullet refers to similarities between the NFCS of exporting and importing countries and not to similarities with international standards.

**Paragraph 12, 1st bullet:**

The bullet should be redrafted as follows:

“the range of products currently being traded between the countries and/or ~~that are subject to similar controls in the exporting country~~ **products proposed for future trade**”

*Rationale:* there should be no reference to similar controls as the intention is to recognise the equivalence of control systems.

**Footnote 16**

Footnote 16 should be redrafted as follows:

One example of a possible decision criteria could be: Regulatory decisions are made on the basis **of transparent risk analysis** ~~science and risk based measures/requirements~~, evidenced

by relevant historical regulatory decisions, published risk assessments, or compliance actions.

*Rationale:* The footnote should refer to the entire risk analysis process and not purely to science and risk based measures/requirements.