

5 July 2017

**European Union comments on
Codex Circular Letter CL 2017/50-EXEC:
Draft set of strategic goals and objectives of the Strategic Plan 2020-2025**

Member States Competence

Member States Vote

The Member States of the European Union (MSEU) welcome the draft set of strategic goals and objectives of the Strategic Plan 2020-2025. This set constitutes a good starting point for the discussions on the elaboration of the new strategic plan.

The MSEU would like to make a number of general comments and also more specific comments on the draft text prepared by the Codex Secretariat.

General comments

The MSEU would welcome an evaluation of the implementation to date of the current strategic plan as well as a detailed explanation of each of the proposed changes to the current plan. This would help Codex members to take a better informed view on the draft goals and objectives for 2020-2025 and would also contribute to achieving an optimal outcome of this important discussion.

The MSEU would like to keep in the new Strategic Plan 2020-2025, the strategic vision statement and the commitment to the core values of collaboration, inclusiveness, consensus building and transparency of the current strategic plan. These values should indeed remain in the new strategic plan in order to underline their importance as the foundation of all Codex work. Similarly, the application of the risk analysis principles is at the core of Codex work and should be adequately reflected in the new plan and in the new strategic goals and objectives.

The MSEU are of the opinion that further discussions are needed on:

- the addition of a long-term tool in the Codex strategic planning, as the relevance of the Strategic Plan 2020-2025 would be enhanced by a common view on how Codex would or should further be developed;
- a greater integration between the FAO¹ and WHO² strategic plans with the proposed Codex goals and objectives.
- a careful selection of the goals/objectives/activities in the strategic plan in order to focus on essential activities that would be closely monitored; this could be done through defining precise, measurable and concrete indicators;
- an improved implementation of the strategic plan; this could be done through the identification of the respective responsibilities and the burden-sharing between all stakeholders as regard objectives and activities (*i.e.* Codex members, the Codex Secretariat, Codex committees, etc.).

¹ Food and Agriculture Organization of the United Nations

² World Health Organization

The MSEU are furthermore of the opinion that, in general, the revision of the current set of goals and objectives should be guided by the following questions:

- To which extent have the current strategic goals/objectives been addressed in a satisfactory way over the last years?
- What was the rationale underlying each of the current strategic goals and objectives? Is this rationale still valid?
- Which of the current strategic goals and objectives should be omitted or modified? What is the rationale for these modifications or omissions?
- Should any new strategic goals and objectives be added? What is the rationale for these additions?

Specific comments

While the discussions suggested above should lead to a further review of the draft set of goals and objectives, the MSEU propose the following specific comments and amendments on the current draft:

Strategic Goal 1: Elaborate relevant Codex food standards, **guidelines and codes of practices** in an inclusive and transparent manner, **and taking into consideration relevant strategic objectives of FAO and WHO.**

Objective 1.2: Ensure Codex standards are in line with **relevant** ~~the priorities of the Codex Alimentarius Commission~~ **strategic objectives of FAO and WHO.**

Objective 1.3: **Strive permanently** ~~Enhance the capacity to arrive at consensus in the Codex standard setting process.~~

Objective 1.4: Ensure that the Executive Committee of the CAC conducts the critical review process in a **well informed and** efficient manner.

Objective 1.6: **Maintain the high level of** ~~Enhance the transparency of the Codex standard-setting process.~~

The Codex processes are, thanks to the website and immediate dissemination of results, largely transparent. However, it is important to maintain this high level of transparency.

Strategic Goal 2: Ensure the ~~availability and relevance of~~ **development of Codex standards through a thorough risk analysis process relying on robust** scientific advice.

Objective 2.3: Ensure that the scientific information taken into account during the risk assessment integrates all relevant sources and data.

Objective 2.4: Improve the transparency of the risk evaluation process.

Objective 2.5: Ensure consistent use of scientific advice and application of risk analysis principles in the development of Codex standards, including the consideration of other relevant factors in the risk management process.

The MSEU would like to underline the need to keep a reference to a consistent application of risk analysis principles in the development of Codex standards in the new strategic plan. They would like to point out that the consistent (and transparent) use of risk analysis principles alongside scientific advice is very important to the legitimacy of standard setting.

This reference should include both, risk assessment and risk management. Risk management, as formulated in activity 2.1.3 of the current strategic plan, should strive to "ensure that all relevant factors are fully considered in exploring risk management options in the context of Codex standard development".

Strategic Goal 3:

The MSEU welcome the inclusion of the new strategic goal 3 to raise awareness about the importance of Codex standards to protect the health of consumers and ensure fair practices in the food trade.

Strategic Goal 4:

~~Objective 4.1: Identify the challenges Codex Members face in their effective participation in Codex.~~

This objective is included in the Objective 4.2.

Objective 4.2: Increase the effective **and active** participation of Codex Members, in particular developing countries, in Codex **work**

Strategic Goal 5:

~~Objective 5.2: Continue developing tools to facilitate effective and efficient contributions from all Codex Members.~~ **Enhance the capacity to arrive at consensus in the standard setting process.**

This objective could constitute an activity related to Objective 5.1: Enhance the efficiency and effectiveness of Codex work.

The draft strategic goal 5 corresponds furthermore to the current strategic goal 4. However, the new objectives 5.1 and 5.2 fall short of the objectives 4.1 and 4.2 of the current strategic plan as the references to transparency and the importance of consensus in the standard setting process are omitted. Although objective 4.2 re-appears as new objective 1.3, the MSEU consider that consensus and especially the activities under 4.2.1 ("improve understanding of Codex members...") and 4.2.2 ("seek to improve the skill set of chairs...") of the current strategic plan are important for the effectiveness and efficiency of the Codex work management systems and practices.