

# FAO/WHO COORDINATING COMMITTEE FOR AFRICA

## European Union reply to CL 2022/02-AFRICA

### Request for Comments at Step 3 on the Proposed draft Guidelines for Developing Harmonized Food Safety Legislation for CCAFRICA Region

#### *European Union Competence European Union Vote*

The European Union would like to thank the Secretariat for CCAFRICA and the Members of the Committee for giving us the opportunity to comment on the Draft guidelines for developing harmonized Food Safety Legislation for the CCAFRICA region in the Appendix to circular letter CL-2022/02 AFRICA.

The EU recognises that the proposed approach provides a structured framework for developing harmonized food safety legislation for the region and would like to propose some suggestion to make further clarity to the text.

#### **General Comments:**

- The EU notes that the introduction of the guidelines highlights the contribution of food safety to sustainable development. In line with this introduction, we would like to propose that a references to sustainable food are also considered in the relevant other parts of the text. Beside the worldwide growing awareness of the need to strengthen national food safety systems to improve protection of consumers' health, the focus is to build sustainable, resilient, innovative and integrated food safety systems globally.
- The EU suggests to also include the adoption of a One Health approach in the principles of food safety legislation. The importance of adopting this approach is underlined in the WHO Global Strategy for Food safety 2022-2030.
- The principles and in particular principle 2 on "the food chain approach" could also use the concept of food safety system that is developed in the WHO Global Strategy for Food safety 2022-2030.
- The establishment of an African Food Safety Agency that is being under consideration by the AU, could be a useful support to the future harmonised food safety legislation, i.e. the establishment of such an agency may be part of the harmonised food safety legislation and its role and tasks can be defined.

- It would be useful to consider the establishment of a food alert system which would enable information to be shared between its members, in order to advert food safety risks before they could be harmful for consumers.

**Specific comment on the proposed draft text:**

The EU would like to propose the following modifications to further improve the text:

**SECTION 1 – INTRODUCTION**

A reference to sustainable food systems is suggested be included in the introduction.

**SECTION 4 – DEFINITIONS**

The EU would like to propose to extend the list of definitions of Paragraph 13 and include definitions for the followings:

- **Risk**
- **Risk assessment**
- **Risk management**
- **Risk communication**
- **Hazard**
- **Traceability**

Furthermore to propose the following modification to paragraph:

- iv. **Legislation means ~~includes acts, the laws,~~ regulations, requirements and/or procedures and administrative provisions governing food in general, and food safety in particular, issued by public authorities, ~~related to foods and~~ covering any stage of production, processing and distribution of food, the protection of public health, the protection of consumers and conditions of fair trading.**

**SECTION 5 – PRINCIPLES OF A FOOD SAFETY LEGISLATION**

The EU would like to propose the following changes:

**PRINCIPLE 1 - ~~CONSUMER PROTECTION~~ OF CONSUMERS' INTEREST**

19. Food safety legislation should have provisions for protecting the health of consumers as a top/primary priority **and shall provide a basis for consumers to make informed choices in relation to the foods they consume. It shall aim at the prevention of fraudulent practices, the adulteration of food and any other practices which may mislead the consumer.**

## **New PRINCIPLE 2bis – The One Health approach**

**The food safety legislation should apply a One Health approach that will to detect, prevent and respond to emerging diseases at the human-animal-environment interface so as to address food related public health issues more effectively.**

### PRINCIPLE 3 – ROLES AND RESPONSIBILITIES

In paragraph 21, point b. should be revised:

b. The **national** government has the role and responsibility to establish and maintain up to date legal requirements and verify that food business operators comply with food safety legislation.

And an additional point should be included about the enforcement of food safety legislation with a clarification who shall ensure that.

In addition the EU would like to suggest to include a new principle on “TRANSPARENCY”.

### **SECTION 6 – ELEMENTS OF FOOD SAFETY LEGISLATION**

The draft guideline should also describe beside the principles, the general requirements of food safety legislation, i.e. that food shall not be placed on the market if it is unsafe. The future food safety legislation should then describe when a food deemed to be unsafe, and what needs to be taken into account by determining whether any food is unsafe.