

Codex Committee on Food Import and Export Inspection and Certification Systems (21st Session)

Brisbane, Australia, 13-17 October 2014

European Union comments on

**Discussion paper on principles and guidelines for monitoring regulatory
performance of national food control systems**

(Agenda item 5, CX/FICS 14/21/4)

*Mixed Competence
European Union Vote*

The European Union and Member States (EUMS) would like to thank the United States for preparing the discussion paper and the draft project document on the monitoring regulatory performance of national food control systems (NFCS).

The workshops organised in Costa Rica and Brussels provided a valuable opportunity to clarify countries' views and expectations on what this new work should entail. It also became clear that some countries already have in place mechanisms for monitoring the performance of the NFCS and many others are considering setting up such systems. Therefore, it would be timely to consider Codex guidance in this area.

The new work as currently presented in the draft project document should result in useful guidance assisting competent authorities in monitoring the effectiveness of their NFCS and in its continuous improvement. Thus the EUMS support the new work with the following comments on the draft project document.

Title of the new work should be modified as follows:

"Principles and Guidelines for Monitoring ~~Regulatory~~ Performance of National Food Control Systems"

Rationale: The monitoring should not be limited only to regulatory performance of official controls but should also include other aspects of NFCS, such as resources of competent authorities etc.

Section 1 should be modified as follows:

"The purpose and scope of the work is to develop a framework and a set of principles and guidelines to assist the competent authority(ies) of a National Food Control System (NFCS)

to develop ~~other~~ appropriate tools (e.g. measurement mechanisms, indicators, analysis and evaluations) which can be used to help design, evaluate, and adjust its own system."

Rationale: The term "other" is redundant.

The last sentence of section 2 should be modified as follows:

"This will help countries to ensure that finite resources invested in food safety **and fair practices in food trade** are producing desired results and assist with stakeholder communication."

Rationale: The dual objective of a national food control system² needs to be covered, i.e. to protect the health of consumers (food safety) and ensure fair practices in food trade.

The 4th paragraph of section 3 should be modified as follows:

"The guidance would take into account and be sufficiently flexible to provide for different countries having **different** systems **which may also be** at different stages of development, depending on their national circumstances."

Rationale: The future guidance should be sufficiently flexible to take into account that NFCS in different countries may be different (not only at different stages of development) depending on their national circumstances.

The last sentence of section 5 should be modified as follows:

"The proposed work provides the basis for countries to undertake systematic self-evaluation of the functioning of their NFCS to determine whether desired public health outcomes are being met and to identify mechanisms to strengthen their **NFCS** ~~overall food safety regulatory system.~~"

Rationale: NFCS covers not only food safety but also fair practices in food trade.

The last sentence of the 1st paragraph in section 6 should be modified as follows:

"When monitoring **NFCS** ~~food safety systems~~, all Codex texts (the Codex Alimentarius) which include guidance on control programs will be considered relevant.

Rationale: NFCS covers not only food safety but also fair practices in food trade.

² In accordance with Section 2 of Principles and Guidelines for National Food Control Systems (CAC-GL 82-2013).