

31 January 2023

CODEX COMMITTEE ON FOOD LABELLING

European Union Comments on CL 2022/73/OCS-FL

Approach and criteria for evaluation and prioritization of the work of CCFL

*Mixed Competence
Member States Vote*

The European Union and its Member States (EUMS) would like to thank the Canadian Secretariat of the Codex Committee on Food labelling (CCFL) for the analysis of the comments in reply to the circular letter CL 2020/09/OCS-FL and the proposed modifications of the draft *Approach and criteria for evaluation and prioritization of the work of CCFL*.

General comments

The EUMS note that some committees have developed or are in the process of developing their own approach and tailored criteria for managing work priorities.

While the EUMS greatly appreciate the efforts of all committees engaging in work management enhancement processes, the EUMS feel that a more detailed overview of all existing procedures in committees and a centralised access to all existing prioritisation criteria and methodologies would be beneficial for Members wishing to propose new work that addresses their needs in Codex.

For that purpose, all prioritisation mechanisms and other work practices that have been developed on this issue should be collated in one single place. Such place could be the practical guidance for new work proposals that is currently being drafted by the Codex secretariat.¹

Specific comments

The EUMS note that, until now, the criteria for the establishment of work priorities applicable to general subjects specified in the Procedural Manual of the Codex Alimentarius Commission, together with the inventory of CCFL's potential future work has been sufficient to manage the workload of the Committee and that a formalised prioritisation process has not been necessary.

The EUMS consider therefore that there is a limited need for a formalised prioritisation process.

If the Committee confirms the establishment of a prioritization process, the latter should only be applied in the case of multiple new work proposals, which are all in line with the priorities

¹ REP22/EXEC2, paragraph 118 (iii)

established in the Strategic Plan of the Codex Alimentarius and the above criteria specified in the Procedural Manual, and which cannot be tackled all together at the same time by the Committee.

In these cases, the EUMS would favour a flexible approach. This approach would entail a prioritisation guidance that is neither too detailed nor too prescriptive and, if needed, the establishment of an *ad hoc* working group, which would be tasked with assessing and prioritising the new work proposals in line with the guidance and making recommendations to the Committee. The Committee would then, on the basis of the self-assessments in the new work proposals and/or the recommendations *ad hoc* working group, prioritize the work.

The EUMS propose therefore to further clarify the text and specify the above aspects by introducing following modifications in the draft *Approach and criteria for evaluation and prioritization of the work of CCFL* (Annex I of CX/FL 21/46/13 Add.1):

- Point 1:
“1. The following guidelines are established to assist the CCFL to identify, prioritize and efficiently carry out its work, as needed, when there are multiple new work proposals to consider **which are all in line with the priorities established in the Strategic Plan and the “Criteria for the establishment of work priorities” applicable to general subjects specified in the Procedural Manual, and which cannot be tackled at the same time by the Committee.**”
- Point 2:
“2. These guidelines apply, ~~as needed,~~ to new work proposed to the CCFL **when there are multiple new work proposals which are all in line with the priorities established in the Strategic Plan and the “Criteria for the establishment of work priorities” applicable to general subjects specified in the Procedural Manual, and which cannot be tackled at the same time by the Committee.**
2a. These guidelines and lays down criteria and **a process procedures** for **evaluating the priority of considering priorities for proposed new work proposals,** including the revision of current texts. **Additional criteria, such as feasibility of the proposed new work, may be necessary and developed later for application while considering two or more items of similar priority².**”
- Point 3:
“3. The prioritization approach has been developed in **recognition of addition of** the criteria for new work as outlined in the Procedural Manual. **The C**riteria relevant to the work of the CCFL and **the a** rating scheme have been developed taking into account the mandate of the Codex Alimentarius Commission, **and** the general principles of food labelling included in the General Standard for the Labelling of Prepackaged Foods (GSLPF).”
- Point 4:
“4. In addition to the priorities established by the Commission in the Strategic Plan, and the criteria applicable to general subjects **specified in the Procedural Manual, following** additional criteria **may be used** ~~are required~~ for **the** ~~assessing~~ of the

² Former last sentence of point 10

new work proposed ~~relevant~~ to the CCFL. ~~Following are the criteria against which the new work to be undertaken in CCFL may be assessed:~~

- In the table specifying the criteria and their ratings:
 - “Potential of the proposed new work to ~~resolve, mitigate,~~ prevent, ~~or significantly~~ reduce or resolve a consumer health risk”,
 - “Potential of the proposed new work to ~~resolve, mitigate,~~ prevent, ~~or significantly~~ reduce or resolve false, misleading or deceptive labelling practices”,
 - “Potential of the proposed new work to assist the consumer in making an informed choice”,
 - “Positive impact (~~positive~~) on international trade”;
- Points 5 and 6:

5. New ~~w~~Work ~~P~~proposals should be presented to CCFL in the format of a project document addressing the criteria given under the “Criteria for establishment of work priorities” for general subjects in the Procedural Manual and should preferably also include a self-assessment that takes into account the additional criteria outlined in this document.

6. ~~The n~~New work proposals should also indicate that the work, if approved to commence, would likely lead to preparation of a new Codex text or revision of an existing Codex text.

- Points 7 to 11 (new order):

10. ~~The N~~new ~~proposed~~ work proposals should ~~may~~ be assessed against the criteria as per the ratings given for each criterion by an ad hoc working group established by the Committee and receive an. ~~New work proposals should ultimately be prioritized as per the overall rating received through this prioritization process. Additional criteria, such as feasibility of the proposed new work, may be necessary and developed later for application while considering two or more items of similar priority.~~

7. As necessary, the CCFL ~~will~~ may prioritize new work proposals, including revision of existing texts, taking into account the self-assessments in the new work proposals and/or the assessments by the ad hoc working group in order of merit based upon decisions made by CCFL after assessing the new work against the criteria (as defined above) for evaluating and prioritizing work.”

8. The Committee may reassess the priority of each item if new information becomes available relating to an item. Such data information may be submitted for consideration and the priority for the new work proposal reconsidered.

9. The criteria ~~should~~ **will** be applied in a stepwise manner, in the order set out in the criteria above. If the Committee decides that a proposed work does not fall under the terms of reference of CCFL, then the remaining criteria do not need to be ~~assessed~~ **applied**.

11. The CCFL will maintain the inventory of future work and emerging issues ~~discussion paper~~ that will include all potential work items relevant to CCFL. The inventory paper work will be kept current at every session with a different Codex member taking on responsibility each time. ~~It may be appropriate for CCFL to establish an ad hoc working group, as necessary, to evaluate and prioritize new work proposals.~~