



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
FAO/WHO COORDINATING COMMITTEE FOR EUROPE**

**Thirty-First Session**

**Almaty, Kazakhstan, 30 September – 4 October 2019**

**USE OF CODEX STANDARDS IN THE REGION**

*(Prepared by the Codex Secretariat)*

## 1. BACKGROUND

1.1. In the context of the revitalization of FAO/WHO Coordinating Committees (RCCs) in 2016, the Codex Secretariat introduced a new survey-based system to continuously collect data on use of Codex standards<sup>1</sup> for all six RCCs with the aim of gaining a better understanding of the relevance of Codex work.

1.2. While the first survey round started in July 2016 and focused on the use of Maximum Residue Levels (MRLs) for pesticides in food and feed, three general subject standards and the General Principles of Food Hygiene, the second survey round in 2019 focused on a different set of Codex standards, namely:

- (i) MRLs for residues of a veterinary drugs in foods;
- (ii) Two Codex texts on Antimicrobial Resistance (AMR) i.e. Guidelines for Risk Analysis of Foodborne AMR and the Code of Practice to Minimize and Contain AMR; and
- (iii) The Regional Guidelines for the Design of Control Measures for Street-Vended Foods<sup>2</sup>.

1.3. In addition, Members were asked about difficulties related to the general use of Codex standards and were informed that other standards would be covered in future survey rounds to build up, over time, a representative data set on the use of Codex texts worldwide.

1.4. The term “use” was employed very broadly to include not only the incorporation of Codex standards into national legislation, but also other types of use such as in support of training or extension programmes.

1.5. The survey was conducted online using the software SurveyMonkey which allowed for easier data analysis and representation. Separate translations into French, Russian and Spanish were provided and Members were given a period of one month to provide answers.

## 2. ANALYSIS AND DISCUSSION SURVEY RESULTS

2.1 The survey obtained a response rate of 86 percent (44 out of a possible 51 Member countries) in the CCEURO region, which is the highest level achieved up to now in any survey on the subject.

2.2 **Table 1** marks all respondents in bold. The European Union (EU) submitted responses on behalf of its 28 member states which are consequently marked in bold. The EU responses have also been counted for the European Free Trade Association (EFTA) member states Iceland, Norway and Switzerland as they follow EU legislation in the surveyed areas of standardization. Two lower middle income countries in the region (World Bank list of economies of June 2019) submitted their responses to the survey.

<sup>1</sup> Throughout this document Codex standards refers to all Codex products including standards, guidelines, codes of practice, Maximum Residue Levels (MRLs) etc.

<sup>2</sup> Countries of the CCNASWP and CCEURO regions were not asked to respond to this part of the survey as no regional standards for street-vended foods exist in their respective regions.

**Table 1: Overview of Codex Members from the CCEURO region and respondents (in bold) to the 2019 survey on use of Codex standards**

<b>Albania</b>	<b>Czechia</b>	Israel	<b>Norway</b>	<b>Sweden</b>
<b>Armenia</b>	<b>Denmark</b>	<b>Italy</b>	<b>Poland</b>	<b>Switzerland</b>
<b>Austria</b>	<b>Estonia</b>	<b>Kazakhstan</b>	<b>Portugal</b>	Tajikistan*
<b>Azerbaijan</b>	<b>Finland</b>	<b>Kyrgyzstan*</b>	Moldova, Rep. of*	<b>Turkey</b>
<b>Belarus</b>	<b>France</b>	<b>Latvia</b>	<b>Romania</b>	Turkmenistan
<b>Belgium</b>	<b>Georgia</b>	<b>Lithuania</b>	Russian	<b>Ukraine*</b>
<b>Bosnia and Herzegovina</b>	<b>Germany</b>	<b>Luxembourg</b>	Federation	<b>United Kingdom</b>
<b>Bulgaria</b>	<b>Greece</b>	<b>Malta</b>	<b>San Marino</b>	Uzbekistan*
<b>Croatia</b>	<b>Hungary</b>	<b>Montenegro</b>	<b>Serbia</b>	
<b>Cyprus</b>	<b>Iceland</b>	<b>Netherlands</b>	<b>Slovakia</b>	
	<b>Ireland</b>	<b>North Macedonia</b>	<b>Slovenia</b>	
			<b>Spain</b>	

\*Low and lower middle income countries (World Bank list of economies June 2019)

2.3 The following is a summary of the survey results.<sup>3</sup>

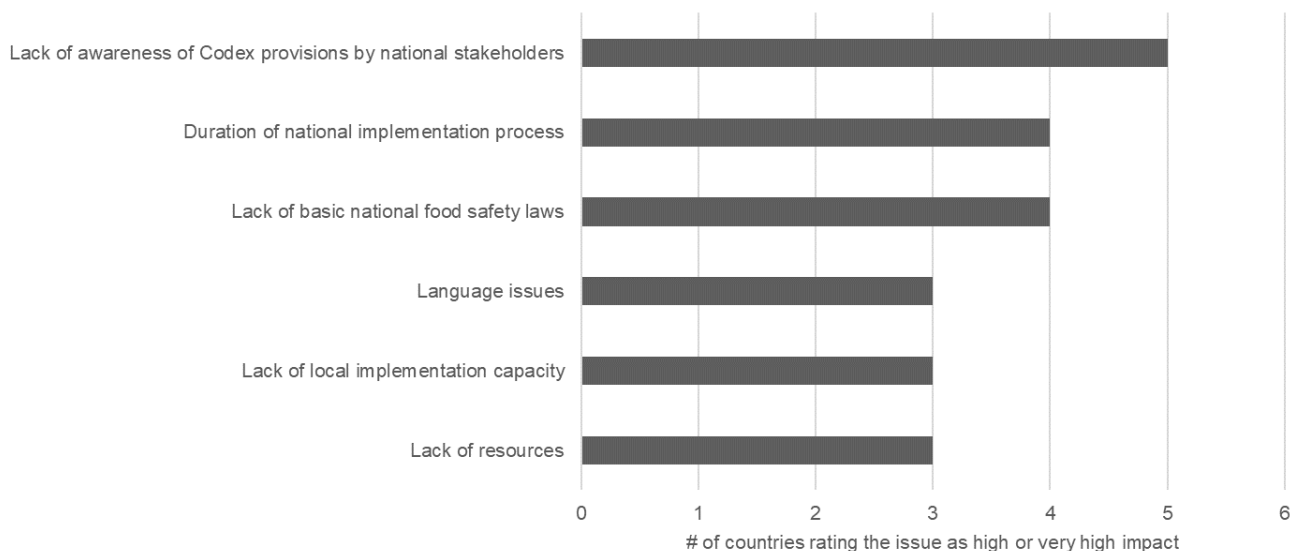
- (i) *Alignment with MRLs for residues of veterinary drugs in food*<sup>4</sup>: With the exception of one country, which stated that MRLs for veterinary drugs in food that is sold nationally would fully align with Codex MRLs, the great majority of respondents from the CCEURO region (96%) replied that national MRLs would partially align with those of Codex. In the case of the EU, its Member States align with MRLs for which the EU has not expressed an objection to the adoption by CAC. Such objections may, amongst others, stem from differences in the risk assessments of the Joint FAO/WHO Expert Committee on Food Additives (JECFA) and the corresponding risk assessments of the European Medicine Agency (EMA). Furthermore, countries that are members of the Eurasian Economic Union also stated that they adopt different MRLs where their risk assessments differed from those of JECFA. One country explained that it had stricter MRLs for certain antimicrobial agent (tetracycline group). One country (2%) was unaware of the national level of alignment.
- (ii) *Use of the Guidelines for Risk Analysis of Foodborne Antimicrobial Resistance (CXG 77-2011)*: Although many countries explained that they are still in the early stages of implementing AMR related legislation, the great majority of respondents (86%) stated that they make some use of the AMR Guidelines. In the EU, the AMR Guidelines are not incorporated into EU legislation, but overall the risk analysis approach applied to foodborne AMR followed the AMR Guidelines. Other respondents stated that they are using the AMR Guidelines as reference for upcoming legislative drafts or were in the process of implementing projects based on the AMR Guidelines e.g. on surveillance of zoonotic agents in poultry plants. Two countries (4%) were not aware of the level of use.
- (iii) *Use of the Code of Practice to Minimize and Contain Antimicrobial Resistance (CXC 61-2005)*: Similarly to the AMR Guidelines for risk analysis, the great majority of respondents (89%) make some use of the AMR Code of Practice. Examples included: Training programmes, projects (in collaboration with FAO), discussions and awareness raising activities, general reference for the national action plan to fight AMR. Three countries (7%) that do not use the AMR Code of Practice explained that they are at too early stage in addressing AMR to make use of the AMR Code of Practice. The remaining two countries (4%) were not aware of the level of use.
- (iv) *Difficulties with regards to the use of Codex provisions*: While EU member countries did not identify any difficulties regarding the use of Codex provisions, a lack of awareness of Codex provisions by national stakeholders was among the top difficulties for the 14 non-EU/EFTA member countries that responded to this question. Some of the respondents explained that, given the obligation for the implementation of the EU legislation (in order to gain EU membership), not enough knowledge about the difference between Codex and EU standards existed in their countries. **Figure 1** sums up further difficulties affecting the use of Codex standards identified by more than two countries in the region.

<sup>3</sup> The full survey results can be accessed in original language under this link:

[http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?Ink=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-706-31%252FWD%252Feu31\\_06e\\_SURVEYRESULTS.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?Ink=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FMeetings%252FCX-706-31%252FWD%252Feu31_06e_SURVEYRESULTS.pdf)

<sup>4</sup> As of June 2019, Codex has 632 MRLs for residues of veterinary drugs in foods covering 66 veterinary drugs.

**Figure 1: Examples of difficulties with the use of Codex standards among Members from the CCEURO region**



### 3. CONCLUSIONS

3.1 Overall, the survey on use of Codex standards obtained a high response rate (86%) and hence the information can be considered representative for the CCEURO region.

3.2 While alignment with Codex MRLs for veterinary drugs in food in the CCEURO region greatly depended on differences between EU and JECFA risk assessments, there is a high level of use of the Codex texts on AMR confirming the importance of taking a standardized approach to the subject in the region.

3.3 For many of the non-EU/EFTA members in the CCEURO region, difficulties regarding the use of Codex standards relate to an overall lack of awareness of Codex provision by national stakeholders as well as a lack of the basic tools such as enabling legislation, infrastructure and resources.

### 4. RECOMMENDATION

4.1 CCEURO is requested to take note of the outcome of the survey and examine how Members can better utilise these results in the engagement of relevant stakeholders to seek support for food safety work and raise awareness of the importance of Codex standards at the national level.

4.2 CCEURO is further requested to provide inputs on the following questions that may guide future action by the Codex Secretariat in this area:

- *Scope of next survey:* Which areas of Codex work would you like to see covered in future surveys on the use of Codex standards?
- *Evaluation of Codex standards:* How feasible do you consider responding to annual surveys on use of Codex standards? Which actions should be taken to increase survey response rates? Are there any national or regional efforts ongoing to assess the level of use of Codex standards?