

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION
AND CERTIFICATION SYSTEMS

Twenty-second Session

Melbourne, Australia, 6-12 February 2016

Comments submitted by Uganda

Agenda Item 4 - CX/FICS 16/22/3

DRAFT PRINCIPLES AND GUIDELINES FOR THE EXCHANGE OF INFORMATION (INCLUDING QUESTIONNAIRES) BETWEEN COUNTRIES TO SUPPORT FOOD IMPORT AND EXPORT

General comment:

Uganda would like to thank the eWG led by New Zealand, Brazil and Mexico in developing the draft Principles and guidelines for the exchange of information between countries to support food import and export.

Specific Comments:

TITLE: Draft Principles and Guidelines for the Exchange of Information (Including Questionnaires) Between Countries to Support Food Import and Export

Uganda proposes to the Committee to adopt the title proposed by the eWG but with modification to delete the brackets "including questionnaires" as "**Principles and Guidelines for the Exchange of Information Between Importing and Exporting Countries to Support the Trade in Food**".

Rationale: This creates clarity by indicating that the information to be exchanged is between two parties i.e. importing and exporting countries. This will avoid any other country which is not party to the trade transaction arbitrarily requesting for information from an importing/exporting country. The inclusion of the words "including questionnaires" in the title makes it unnecessarily long without adding any value.

SECTION 3 – SCOPE: PARA 8:

To be modified as follows:

These guidelines address situations where information exchange may be required **by an importing** country for the assessment of relevant component(s) of an exporting country's NFCS that may cover a product or group of products prior to the initiation or maintenance of trade.

Rationale: For clarity with respect to the two parties requiring exchange of information

SECTION 4 – Exchange of information and assessment: PARA 10 (b)

Change "NFCs" to "NFCS" – This is the abbreviation used throughout the document so it will maintain consistency in the text.

SECTION 5 – PRINCIPLES: PARA 11 (f)

To be modified as follows

Not require the submission of commercially sensitive information **for specific food business operators** unless essential to assess the public health objective, in which cases, it should be protected from inappropriate use or disclosure to other parties.

Rationale: It's a suitable way to express the wish to avoid requests for detailed food business operators' information unless necessary and to respond to emerging/emergency situations without restricting regulatory tools.

SECTION 6 – PROCESS: PARA 13 (a)

To be modified as follows:

Clearly outline the information required, why it is required (**clearly indicating the associated or perceived risk**), and the process and methodology to be followed, including anticipated timelines.

Rationale: This will minimize arbitrary request for information by an importing country without sound justification

AGENDA ITEM 5 : CX/FICS 16/22/4

PROPOSED DRAFT GUIDANCE FOR MONITORING THE PERFORMANCE OF NATIONAL FOOD CONTROL SYSTEMS (At Step 3)

Uganda appreciates the work done by the eWG led by United States of America in coming up with this draft guidance document for monitoring the performance of national food control systems.

Below is our specific Comment:

Section 1 – introduction: para 4

“This document presents a performance monitoring framework to support the monitoring and system review function of the NFCS as described in section 4.4 of CAC/GL 82-2013. The guidance is intended to support self-assessment of a country's NFCS and is not intended to be used as a basis for comparing systems or imposing barriers to trade”.

We propose to move this entire text to Section 2: Purpose of the Guidance

Rationale: This is represents a fundamental principle of the document and its best suited under section 2.

SECTION 3 – DEFINITIONS: Efficiency

We propose to delete the word “resources” as used in the text since inputs is sufficiently defined in the draft document.

AGENDA ITEM 6 CX/FICS 16/22/5

REVISION OF THE PRINCIPLES AND GUIDELINES FOR THE EXCHANGE OF INFORMATION IN FOOD SAFETY EMERGENCY SITUATIONS

Uganda appreciates the work done by the eWG that was led by European Union and co-chaired by Chile.

GENERAL COMMENTS

Comments on Recommendations by the eWG

Uganda comments on the recommendations as follows:

- a. To extend the provisions of this guideline to cover the actual management of food safety emergencies.

Rationale: This will give a more compressive document that will not only consider information exchange but guidance on how to manage food safety emergence.

- b. The title of the document to be modified to accommodate provisions on Management of food safety emergencies

Rationale: For clarity and true reflection of document content

- c. There is need for an Annex containing information requirements

Rationale: This will guide Competent Authorities in the minimum type of information that is required for exchange in case of a food safety emergency

- d. The document should retain the original Annex

Rationale: The original annex is more detailed

SPECIFIC COMMENTS

5.3 Food Business Operators – para 14.

We propose a footnote to be added on this section to define the scope of Food Business Operators as follows: **“For the purposes of this document, food business operators include producers, processors, wholesalers, distributors, importers, exporters and retailers”**

Rationale: This will bring clarity with respect to the scope of food business operators. It will also be consistent with provisions of the Draft Principles and Guidelines For The Exchange Of Information (Including Questionnaires) Between Countries To Support Food Import And Export- para- 10 (e)

AGENDA ITEM 7 CX/FICS 16/22/6

PROPOSED DRAFT REVISION OF THE GUIDELINES FOR THE EXCHANGE OF INFORMATION BETWEEN COUNTRIES ON REJECTIONS OF IMPORTED FOOD (CAG/GL 25-1997)

GENERAL COMMENT

Uganda strongly supports the consideration for including provisions for animal feed as related to food safety. The provisions should cover feed for food producing animals.

Rationale: This is because of the potential impact of harmful residues from animal feed being passed into feed producing animals and subsequently affecting the consumer.

SECTION 1 – INTRODUCTION: PARA 1:

We propose to delete the words “as well as feed for food producing animals” in the paragraph.

Rationale: This is sufficiently covered and implied as the definition for food in this standard includes feed for food producing animals.