CODEX ALIMENTARIUS COMMISSION



Food and Agriculture Organization of the United Nations



Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org
Agenda Item 4
CX/GP 16/30/4
February 2016

# JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON GENERAL PRINCIPLES

# Thirtieth Session

Paris, France, 11 - 15 April 2016

# CONSISTENCY OF THE RISK ANALYSIS TEXTS ACROSS THE RELEVANT COMMITTEES

# (prepared by the Codex Secretariat in collaboration with FAO and WHO)

Governments and international organizations in Observer status with the Codex Alimentarius Commission wishing to submit comments on this document are invited to do so no later than <u>30 March 2016</u> as follows: Ms Geneviève Raoux, *Ministère de l'Economie, de l'Industrie et du Numérique, Direction générale de la concurrence, de la consommation et de la répression des fraudes*, 59 Boulevard Vincent Auriol, Teledoc 223, 75703 Paris Cedex 13, France (E-mail: genevieve.raoux@dgccrf.finances.gouv.fr) with a copy to the Secretariat of the Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme (E-mail: <u>Codex@fao.org</u>).

# BACKGROUND

- 1. This activity was included in the Strategic Plan 2008-2013 as Activity 2.1 "*Review of the consistency* of risk analysis principles elaborated by the relevant Codex Committees" and should have been completed by 2011.
- 2. The matter of consistency was first considered by CCGP25; (see ALINORM 09/32/33) and the relevant document (CX/GP 09/25/5). CCGP25 requested the Secretariat to prepare a revised document and circulate it for comments. The document "*Review of the Risk Analysis policies of Codex Committees*", (CL 2010/1-GP) and comments were considered by CCGP26 (see Appendix 1 for the discussion), which agreed that the risk analysis policies developed by Codex committees were generally consistent with the "*Working principles for risk analysis for application in the framework of the Codex Alimentarius*", which complied with the mandate given to the Committee under Activity 2.1. CCGP26 agreed to forward the review presented in CL 2010/1-GP to the committees concerned for their consideration and review of their risk analysis policies, which would initiate Activity 2.2 of the Strategic Plan.
- 3. Following the decision of CCGP26 (ALINORM 10/33/33), the committees concerned, i.e. CCCF, CCFA, CCFH, CCNFSDU, CCPR and CCRVDF, started to review their documents and this work was finalized in 2014. The last committees to finalize the revision were CCPR46 and CCRVDF21.
- 4. In adopting revisions of the *Risk Analysis Principles Applied by CCRVDF* and of the *Risk Assessment Policy for Residues of Veterinary Drugs in Foods*, CAC35 noted that the CCGP could review these documents for consistency at its next session.
- 5. In completing this review, CCGP28 agreed to consider the consistency of all risk analysis texts across the relevant committees at its next session guided by a document, prepared by the Codex Secretariat, which would compare and analyse the texts of the different committees. However, such a document was not prepared for CCGP29 and it was agreed to consider this item at the next CCGP session.

#### ANALYSIS

6. The Secretariat analyzed the different texts by ordering abbreviated texts of the paragraphs of each of the principles side by side in the order of the General Principles (see Appendix 2). This was only done to facilitate the comparison and it is not proposed to reorder the texts in this manner also keeping in mind the comments made at CCGP26 (see Appendix 1, para 49).

## General Comments

- 7. The texts are generally consistent with the Working Principles and in practice give Codex committees sufficient guidance on how to conduct the risk analysis. The main concepts of the working principles are contained in all texts, however the texts differ significantly in structure and the amount of procedural text contained and how they deal with risk assessment policy (separate section, integrated or separate annex). The main structural differences to the working principles have already been mentioned in CL 2010/1-GP and not much has changed since.
- For two of the committees (CCRVDF and CCPR), FAO and WHO expert bodies are the only 8. acceptable source of scientific advice; for three committees (CCFA, CCCF and CCFH) the main source of scientific advice are FAO and WHO expert bodies however other international scientific bodies are admitted if agreed by the Commission. For one committee (CCNFSDU) no specific expert body is mentioned, FAO and WHO are acknowledged as the primary source of nutritional risk assessment advice while other internationally recognized bodies are admitted as approved by the Commission.

# Specific Comments

- CCFA
- 9. The text for CCFA was derived from the Joint CCFA/CCCF text, which was split into two separate texts following the recommendation at CCGP26. The structure used is different than the working principles using as headings the bodies responsible: CCFH, JECFA and CCFA and JECFA, ordering the paragraphs by which body is responsible. The text does not contain an explicit risk assessment policy but paras 33 and 34 give indications about the priorities. The Committee decided in 2011 that the text was adequate and there was no merit in reformatting it (REP11/FA, para 14) and in 2012 finalized the text on the basis of a proposal from the Secretariat (REP12/FA, para 21).

## CCCF

10. The Committee had revised its risk analysis principles and the exposure assessment annex to reflect the split of the CCFAC into CCFA and CCCF in 2007 (see ALINORM 07/30/41, para 18). The text is ordered in a similar way as the CCFA text but contains somewhat more structure in subheadings. The reference to the exposure assessment policy should be corrected in para 17 and para 17 bis should be renumbered. The Committee decided in 2010 that no action to revise the text was necessary (see ALINORM 10/33/41, para 24).

# CCRVDF

The Committee undertook extensive work on its Risk Analysis principles since 2010 (including 11. Concern Form and extrapolation of MRL to other species as well as clarifications of other parts in the text and in the risk assessment policy). The process was completed in 2014. Most of the text is under the heading "Risk management in CCRVDF" including the risk assessment. The risk assessment policy remains in an annex. With the exception of some numbering issues in section 3 (3.1.3 and 3.1.4 could logically be sub-sections of 3.1.2), the text seems well structured and broadly follows the working principles.

#### CCPR

12. The Committee undertook extensive work on its risk analysis principles since 2008 including the integration of the previous annex on risk management policies and prioritization into the main text and the elaboration of a number of new annexes. The resulting text is the longest of all risk analysis texts. The order used in the text is a mixture of the three parts of Risk Analysis and the work procedure of the CCPR. One could argue that e.g. the prioritization process, which has been included under risk management, is rather part of the risk assessment policy or that the reference to the step procedure is procedural and should not be in the risk analysis principles. On the other hand, it may be practical for members to have all relevant information in one comprehensive document and that the order chosen is the most user-friendly even if not in line with the Working Principles. There seem to be some issues in the section numbering logic in section 5.

# CCNFSDU

13. The text closely follows the working principles while adapting the definitions and other texts to nutritional risk analysis. There is no recognition of the Joint FAO/WHO Expert Meetings on Nutrition (JEMNU) as a source of scientific advice. This does not reflect current practice across Codex committees and should be corrected by the CCNFSDU.

#### CCFH

14. The CCFH text mainly follows the working principles while in addition making reference to other risk analysis texts developed by the CCFH. Since 2010 the text was revised and notably the procedural part was removed.

## CONCLUSION

15. Overall, there do not seem to be impediments for the effective use of the present risk analysis principles of Codex committees and some of the principles have only been finalized recently. There is thus no immediate need for a revision of the Codex risk analysis section of the Procedural Manual.

## RECOMMENDATIONS

#### Short term

- 16. CCNFSDU should revise the text on nutritional risk analysis and include JEMNU as its primary source of scientific advice.
- 17. Minor numbering issues in the texts for CCCF, CCRVDF and CCPR should be addressed by the Secretariat with the relevant Committee.

#### Medium term

- 18. A substantial review of the Codex risk analysis section of the Procedural Manual could be considered as work under the upcoming Codex Strategic Plan 2020-2025. Such work could be led by the Secretariat but should closely involve the relevant Committees as well as the joint expert committee (JEMRA, JECFA, JMPR and JEMNU) secretariats and should be based on the experience gathered with the application of the existing texts rather than on a linguistic and structural consistency review with the oldest of the texts (the working principles).
- 19. If deemed necessary and to take into account of new developments in risk analysis it could be considered to overhaul the *Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius*, possibly based on an FAO and WHO expert consultation.

# Appendix 1

Discussion in CCGP26 (ALINORM 10/33/33 paras 48-55)

48. The Secretariat highlighted the main general issues that had been identified in the review and the proposals for consideration by the Committee: reordering the texts according to the three components of risk analysis; defining risk assessment policy more clearly; developing risk communication further where appropriate; integrating into a single text all provisions on risk analysis and considering the deletion of procedural elements. Some questions were also put forward for consideration by specific committees, for example whether additives and contaminants should be addressed in separate documents.

49. Several delegations noted that the main elements of risk analysis were included in the risk analysis policies developed by Codex Committees, even if they did not always follow the format of the *Working Principles for Risk Analysis*. They pointed out that if the documents were reordered, they may become less readable and more difficult to use. This would also create an additional workload for Committees which should focus on developing standards for food safety. It was also proposed to limit the recommendations to an editorial reordering of the provisions without considering substantial amendments.

50. Several proposals were put forward in the discussion: asking the views of the Committees concerned and considering their proposals before proceeding further in the CCGP; reviewing the consistency in the application of risk analysis in various committees; and asking the views of FAO and WHO especially regarding the interaction between risk managers and risk assessors.

51. The Delegation of New Zealand expressed the view that the risk analysis principles developed by various committees had mainly repeated the overarching framework of the *Working Principles* with some adjustment, and should rather concentrate on the specificities of each risk analysis process, especially through the development of an adequate risk assessment policy. The Delegation proposed that committees should explain in particular how they took into account uncertainties and other legitimate factors in the risk analysis process and that this might be assisted by a working group of CCGP.

52. The Committee noted a proposal to review the use of the term "evaluation" and to replace it with the more adequate term "assessment" throughout the risk analysis documents developed by Codex Committees.

53. Some delegations expressed the view that two separate risk analysis documents should be developed for food additives and for contaminants

54. It was noted that the Committee on Pesticide Residues (CCPR) was revising its risk analysis policies and it was suggested to forward some general recommendations to the CCPR, for consideration as part of the revision process.

## Conclusion

55. The Committee agreed that risk analysis policies developed by Codex committees were generally consistent with the *Working Principles for Risk Analysis*, which complied with the mandate given to the Committee under Activity 2.1. The Committee also agreed to forward the review presented in CL 2010/1-GP to the committees concerned for their consideration and review of their risk analysis policies, which would initiate Activity 2.2 of the Strategic Plan.

# Comparison of Codex Risk Analysis Texts

Working Principles (WP)	CCFA (2007)	CCCF (2007)	CCRVDF (2014)	CCPR	CCNFSDU	CCFH
1 Scope	1 Scope	1 Scope	1 Purpose/scope	1 Scope	1 Background	1 Scope
1 RA principles for Codex	1 Applications of RA principles to CCFA	1 as CCFA, para 1	1 RA principles of CCRVDF. Link to WP.	1 Application of RA principles to CCPR and	1 as WP, para 1 ( <i>could be</i> deleted)	1 Roles of CCFH and JEMRA and link to WP
2 Guidance to Codex	and JECFA. (WP	2 as CCFA, para 2	(WP, paras 1,2)	JMPR and link to WP	,	(WP paras 1,2)
committees and relevant	paras 1, 2)				2 the para links risk analysis	
Joint FAO/WHO expert		3 Reference to feed	2 Roles of CCRVDF		for nutritional matters to WP	7 CCFH commissions
podies and consultations	Does not preclude		and JECFA and link to		para 2 and the mention of	JEMRA through
	consideration	4 Role of CCCF (WP,	WP.		"health aspects"	FAO/WHO. For matter
3 Roles of Codex	recommendations of	para 3)				that cannot be
committees and risk	other internationally		3,4 Repetition of role of		3 Link to the mandate of	addressed by JEMRA
assessors	recognised bodies	5 Role of JECFA (WP,	CCRVDF.		CCNFSDU to also endorse	this does not preclude
	and ad-hoc expert	para 3)	5 Depetition of value of		and provide advice to other	consideration of
	consultations as approved by the		5 Repetition of role of JECFA and additional		committees	recommendations from other internationally
	Commission.		role of JECFA to give		2 Introduction	recognized expert
	Commission.		advice to governments.			bodies as approved by
	2 Link to WP		advice to governments.		4 Explains linkage and	the Commission
					difference to traditional risk	
	21 JECFA role				analysis	
	(WP, para 3)					
	( ) [ /				5 Link to WP	
	7 CCFA role (WP,					
	para 3)				6 Three components and	
					additional part: Problem	
					formulation	
					(this is repeated in para 14)	
2 General aspects	2 CCFA and JECFA	2 General Principles of CCCF and JECFA	2 Parties involved	2 General aspects	3 Scope	
4 Consistent application;			3 Risk Management in	Summary of the MRL-	7 Some repetition with para	
observe the statements of	3 Communication is	6 as CCFA, paras 3 and	CCRVDF	setting process	4 and explanation of	
principle;	essential	4			nutritional benefit.	
	requirement (WP	7 0054	7 Structured approach	2 Roles of CCPR and	O Nutrie de la Cieta estat la des	
5 Structured approach: RA,	para 38)	7 as CCFA, para 5	of RM – (WP, para 28)	JMPR (WP, para 3)	8 Nutrients of interest to the	
RM, RC	4 CCFA/JECFA			3 Process starts with	NRA (those that increase risk through inadequate and	
6 Process should be	4 CCFA/JECFA		8 Other legitimate	nomination of pesticide	those doing this through	
documented	procedures to		factors - (WP, para 28)	for evaluation.	excessive intake)	
uocumenteu	improve the			CCPR/JMPR secretaries	excessive initiate)	
7 Communication between	communication		3.1 preliminary risk	prioritise and schedule	9 Consideration of food	
all parties			management activities		matrix for nutritional benefits	
8 Components should be	5 JECFA/CCFA			4 WHO Core		
applied under an	make sure that all			Assessment Group		
overarching RM frame	interested parties					

# Appendix 2

transparent, to 0 insufficient information:       transparent, councemts (no practice used ed made available in a made available in a mane (VP para 6 and 41)       Sectors 0 Sectors 0 Sectors 0 Sectors 0 made available in a made available in a made available in a mane (VP para 6 and 41)       Sectors 0 Sectors 0 Sect			1	<b>1</b>			· · · · · · · · · · · · · · · · · · ·
documented. no Isnatificient information: no standard but code of concerns for conclemation be advailable in a timely manner. (WP parts 6 and 41)       documented. Procession and evailable in a timely manner. (WP parts 6 and 41)       s FAO panel of Experts on Pesticide Residues at an oregistered use patterns etc.       in NR a should be a quantitative as possible. Explanation of where qualitative content.       11 NR a should be a quantitative as possible. Explanation of where qualitative can be used.         12 Needs of developing countries       a de available in a timely manner. (WP parts 6 and 41)       a de available in a timely manner. (WP parts 6 and 41)       a definition as exception as exception at a consider single as primary source - does not preclude to option. Advocuted advocute data advocute data problemation division as preparation of visiting advocute data advocute data adv	9 Functional separation but	involved;		9 List of the preliminary	considers data to	10 Quantitative NRA may	
10 Institution information: or standard but code of vactice       Respect legitimate confidentiality documentation be made available in a imade available in a imade available in a para 6 and 41)       S FAO panel of Expense of Pesticule Residues in Food and the optatem set:       11 NRA should be a quantitative as possible. Environment considers data on registered use patem set:       11 NRA should be a quantitative as possible.         12 Needs of developing sountries       6 JMPR Risk assessment Includes both short-term and long-term dietary exposures.       6 Selection of Risk Assessment Includes both short-term and long-term dietary exposures.       33 FAO and WHO acknowledged as primary source - does not prectude review program.         38 Risk Assessment Policy 13 Component of RM 13 Component of RM       6 Minimum quality criteria for data- priority list       8 as CCFA, para 6 JECFA       31.1 Risk assessment policy of the conduct of the risk assessment policy of the roke COR       11 NRA should be a qualitative can be used.         38 Risk Assessment Policy (14 Amon of RA policy criteria for data- priority list       8 as CCFA, para 6 JECFA       31.1 Risk assessment policy of the conduct policy of the roke COR       3. Risk assessment considerations of to standard by core-       2 Prioritisation of proposale NRA       2 Prioritisation of proposale NRA to standard by core-         38 Risk Assessment Policy       6 Minimum quality criteria for data- problem formutation as preliminary risk management ac	iterative process			RMA (WP, para 32)	establish ADI/ARfD		
no standard but code of varcice       conferns for conferns for confidentiality, documentation be in a timely manner. (WP para 6 and 41)       no standard but code of timely manner. (WP para 6 and 41)       11 MRA should be a quantitative as possible. Explanation of where qualitative can be used.         12 Needs of developing countries       para 6 and 41)       Para 41)       A MPR Risk assessment includes but short-term and long-term includes but there internationally there internation there internation of there internation of there inter						quantitative content.	
confidentiality       confidentiality       confidentiality       guantiality as possible.         11 Precaution/ uncertainy       the conventiant on the made available in a timely manner.       fead and the Environment considers data on registered use patterns set.       guantiative as possible.         12 Needs of developing countries       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         12 Needs of developing countries       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         12 Needs of developing countries       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         12 Needs of developing countries       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         12 Needs of developing countries       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         12 Needs of developing countries       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         12 New definitions       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         13 Active periodic       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and 41)         13 Active periodic       para 6 and 41)       para 6 and 41)       para 6 and 41)       para 6 and	10 Insufficient information:						
11 Precaution/ uncertainly 12 Needs of developing countries       documentation be made available in a imely manner. (WP para 6 and 41)       Brite Assessment Policy as 6 and 41)       Brite Assessment Policy assessment Poli	no standard but code of	concerns for			on Pesticide Residues in	11 NRA should be a	
11 Precaution/ uncertainty Iz Needs of developing countries       made available in a imely maner. (WP para 6 and 41)       made available in a imely maner. (WP para 6 and 41)       here a countries       calitative can be used.         12 Needs of developing countries       made available in a imely maner. (WP para 6 and 41)       here a countries       countries       countries         12 Needs of developing countries       made available in a imely maner. (WP para 6 and 41)       here a countries       countries       countries         12 Needs of developing countries       made available in a imely maner. (WP para 6 and 41)       here a countries       countries       countries         12 Needs of developing countries       made available in a imely maner. (WP para 6 and 41)       factor negistered use parportaite NRA policy established by CCNFSDU       approved parportaite NRA policy established by CCNFSDU         3 Risk Assessment Policy citerai of cdata proting intro tries       factor factor adoption of policy for the conduct of the fisk maneysing 3 JECFA agendaria       8 as CCFA, para 6 JECFA       1.1 Risk assessment policy for the conduct of the fisk maneysing 3 Considerations of CCPR when preparing       12 New definitions 13 adoptation of existing RA definitions as preliminary tries, management addity to the fisk management of the fisk management of the fisk management policy for the conduct of the fisk management of the fisk management policy for the conduct of the fisk management of the fisk management of the fisk management of the fisk management of the fisk management addity fand the policy of the fisk management of the fisk managem	practice	confidentiality			Food and the	quantitative as possible.	
12 Needs of developing countries       timely manner. (WP para 6 and 41)       patterns etc.       6 Selection of Risk Assessor by the CSMPSDU         2 Needs of developing countries       and 41)       and 41)       and 41)       and 41)         2 Needs of developing countries       and 41)       and 41)       and 41)       and 41)         3 FAC and WHO acknowledged as primary source - does not preclude other internationally recognized expert bodies as approved by the countries       33 FAC and WHO acknowledged as primary source - does not preclude other internationally recognized expert bodies as approved by the countries         3 Risk Assessment Policy 13 Component of RM 14 Ams of RA policy erief ar of data - priority ist 13 Ams of RA policy erief ar of data - priority ist       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment prolicy for the conduct of the risk managesize 10 Link to risk       3. Risk assessment policy       6 Selection of Risk Assessor by the CCPR sources       2 Prioritisation of proposals for new work		documentation be			Environment considers	Explanation of where	
12 Needs of developing countries       timely manner. (WP para 6 and 41)       patterns etc.       6 Selection of Risk Assessor by the CSMPSDU         2 Needs of developing countries       and 41)       and 41)       and 41)       and 41)         2 Needs of developing countries       and 41)       and 41)       and 41)       and 41)         3 FAC and WHO acknowledged as primary source - does not preclude other internationally recognized expert bodies as approved by the countries       33 FAC and WHO acknowledged as primary source - does not preclude other internationally recognized expert bodies as approved by the countries         3 Risk Assessment Policy 13 Component of RM 14 Ams of RA policy erief ar of data - priority ist 13 Ams of RA policy erief ar of data - priority ist       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment prolicy for the conduct of the risk managesize 10 Link to risk       3. Risk assessment policy       6 Selection of Risk Assessor by the CCPR sources       2 Prioritisation of proposals for new work	11 Precaution/ uncertainty	made available in a			data on registered use	gualitative can be used.	
12 Nexteds of developing sountries       para 6 and 41)       para 6 and 41)       6 Subjection of Risk       Assession by the CCNFSDU         2 Nexteds of developing sountries       para 6 and 41)       assessment includes bothem and indications       33 FAO and WHO acknowledged as primary source - does not preclude other internationally recognised expert bodies as approvale by the CONFSDU         3 Risk Assessment Policy 13 Component of RM       6 Aminimum quality cripinity list for data - priority list       8 as CCFA, para 6 JECFA       31.1 Risk assessment policy for the conduct of the rinamalysis       3 Risk assessment of propasis for new vork         3 Risk Assessment Policy tid Ams of RA policy rointy list       6 Minimum quality cripinity list       8 as CCFA, para 6 JECFA       31.1 Risk assessment policy for the conduct of the rinamalysis       9 Casiderations of cripinity list       2 Prioritisation of propasis for new vork	,	timely manner. (WP					
countries       6 JMPR Risk assessment fullows both short-term and long-term dietary exposures       Assessor by the CNFSDU       Assessor by the CNFSDU         3 FAO and WHO acknowledged as primary source - does not preduce doption - Active periodic review program.       3 FAO and WHO acknowledged as primary source - does not preduce approved by the Commission.         3 FAO and WHO acknowledged as primary source - does not preduce doption - Active periodic review program.       3 FAO and WHO acknowledged as primary source - does not preduce approved by the Commission.         3 FAO and WHO acknowledged as primary source - does not preduce doption - Active periodic review program.       3 FAO and WHO acknowledged as primary source - does not preduce doption - Active periodic review program.         3 Risk Assessment Policy 13 Component of RM       6 Minimum quality of Minimum quality priming risk promy lisk 	12 Needs of developing					6 Selection of Risk	
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       10 Link to risk       10 Link to ri	1 0	para e ana my			6.IMPR Risk		
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       31.11 Risk assessment       3.1.1 Risk assessment       3. Risk assessment       9 Considerations of       2 Prioritisation of         13 Component of RM       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3. Risk assessment       9 Considerations of       2 Prioritisation of       2 Prioritisation of         13 Component of RM       14 Ame of RA policy       33 JECFA agenda -       9 Considerations of       2 Core internations of       2 Description of         14 Ame of RA policy       33 JECFA agenda -       Preparation of risk       10 Link to risk       2 Description of       2 Description of						2	
3 Risk Assessment Policy       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct 10 Link to risk       3.1.1 Risk assessment policy       3. Risk assessment policy       3. Risk assessment policy       3. Risk assessment policy       3. Risk assessment policy       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct 10 Link to risk       3. Risk assessment policy       3. Risk assessment policy       3. Risk assessment policy for the conduct priority list       3. Risk assessment policy       3. Risk assessment policy       3. Risk assessment policy       2. Prioritisation of proposal for new work       2. Description of proposal for new work							
3 Risk Assessment Policy 13 Component of RM       6 Minimum quality citeria for data- priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct 10 Link to risk       3.1.1 Risk assessment policy for the conduct 10 Link to risk       3. Risk assessment policy for the risk analysis       3. Risk assessment policy for the risk analysis <td< td=""><td></td><td></td><td></td><td></td><td></td><td>22 EAO and WHO</td><td></td></td<>						22 EAO and WHO	
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3.1.1 Risk assessment       3.1.1 Risk assessment       9 Considerations of the risk analysis       10 Link to risk       10 Link t					5		
3 Risk Assessment Policy 13 Component of RM       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 jECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk assessment policy of the risk analysis       7. CCPR considers JMRR recommendations - those accepted are submitted to CAC for adoption. Active periodic review program.       other internationally recognised expert bodies as approved by the Commission.         3. Risk Assessment Policy 14 Alms of RA policy criteria for data - priority list       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 jECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk assessment policy of the risk analysis       3. Risk assessment policy of the risk analysis       9 Considerations of CCPP when preparing       2 Prioritisation of proposals for new work					exposures		
3 Risk Assessment Policy 13 Component of RM       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk Assessment policy       3. Risk assessment policy       7 recognised exper bodies as approved by the Commission.       2 Prioritisation of policy         3 Risk Assessment Policy 14 Alms of RA policy 14 Alms of RA policy 14 Mins of RA policy       8 as SCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk Assessment policy       3. Risk assessment policy       10 Link to risk       2 Prioritisend enveluem to ribust on of commission.       2 Prioritisend enveluem to ribust on of commission.       2 Prioritisend enveluem to ribust on of commission.					7 CCDD aproiders		
<ul> <li>A Risk Assessment Policy</li> <li>B Risk Assessment Policy</li> <li>Component of RM</li> <li>B Risk Assessment Policy</li> <li>Component of RM</li> <li>C S A Section of risk</li> <li>D Link to risk</li> </ul>							
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3.1.1 Risk assessment       3.1.1 Risk assessment       9 Considerations of       2 Prioritisation of         13 Component of RM       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3.1.1 Risk assessment       9 Considerations of       2 Prioritisation of         13 Component of RM       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link to risk       10 Link to risk       9 Considerations of       2 CCRP when preparing       15 Refer to WP without       2 Description of							
Base Assessment Policy 13 Component of RM6 Minimum quality criteria for data - priority list8 as CCFA, para 6 priority list3.1.1 Risk assessment policy for the conduct of the risk analysis3.1.8 isk assessment policy3.8 risk assessment policy of the risk analysis3.8 risk assessment policy3.8 risk assessment policy3.8 risk assessment policy3.8 risk assessment policy of the risk analysis3.8 risk assessment policy3.8 risk assessment policy3.8 risk assessment policy3.8 risk assessment policy3.8 risk assessment policy3.8 risk assessment <br< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td></br<>							
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       9 Considerations of       3.Risk assessment       2 Prioritisation of         13 Component of RM       9 JECFA       3.1.1 Risk assessment       9 Considerations of       2 Prioritisation of       2 Prioritisation of         14 Aims of RA policy       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link to risk       10 Link to risk       2 CPR/JMPR outputs       15 Refer to WP without       2 Description of         14 Aims of RA policy       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link to risk       10 Link to risk       2 Description of       2 Description of						Commission.	
<ul> <li>B Risk Assessment Policy</li> <li>B Minimum quality criteria for data - priority list</li> <li>B Risk Assessment of RM</li> <li>B Ass CCFA, para 6</li> <li>J L Ink to risk</li> <li>J L Link to risk</li> </ul>							
A Risk Assessment Policy       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk Assessment policy       3. Risk assessment policy for the conduct of the risk analysis       3. Risk assessment policy       9. Considerations of CCPR when preparing       Preparation of risk propering to representing       2. Prioritisation of proposals for new work         14 Aims of RA policy       3.3 JECFA agenda - Preparation of risk priority list       10. Link to risk       10. Link to risk       10. Link to risk       10. Link to risk       Number on comparison					review program.		
B Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3.1.1 Risk assessment       9 Considerations of       2 Prioritisation of         13 Component of RM       9 Sasted a-       preparation of risk       10 Link to risk       10 Link to risk       10 Link to risk       9 Considerations of       2 Prioritisation of       2 Prioritisation of         14 Aims of RA policy       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link to risk       10 Link to risk       9 Considerations of       2 Prioritisation of       2 Definitions       2 Definitions         14 Aims of RA policy       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link to risk       10 Link to risk       9 Considerations of       2 Definitions       2 Definitions							
Brisk Assessment Policy       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       9 Considerations of CCPR when preparing in mole when preparing       9 Considerations of CCPR when preparing       9 Considerations of CCPR when preparing       9 Considerations of CCPR when preparing       9 Description of priority list       9 Description of proparing         14 Aims of RA policy       33 JECFA agenda - prescription of prescription of prescription of prescription of prescription of priority list       9 Link to risk       10 Link to risk <td< td=""><td></td><td></td><td></td><td></td><td>8 CCPR/JMPR outputs</td><td>appropriate NRA policy</td><td></td></td<>					8 CCPR/JMPR outputs	appropriate NRA policy	
B Risk Assessment Policy       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       0 coumented and available in timely manner (WP para 6 and 41)       4 Definitions       12 New definitions         3 Risk Assessment Policy       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk assessment policy       9 Considerations of CCPR when preparing       Preliminary NRA 15 Refer to WP without citing directly.       2 Prioritisation of proposals for new work					should be science	established by CCNFSDU	
available in timely manner (WP para 6 and 41)       12 New definitions         13 adaptation of existing RA definitions       13 adaptation of existing RA definitions         3 Risk Assessment Policy 13 Component of RM       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk assessment policy       12 New definitions         14 Aims of RA policy 14 Aims of RA policy       3. JECFA agenda - Preparation of risk       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk assessment policy       15 Refer to WP without citing directly.       2 Prioritisation of proposals for new work					based, transparent,	-	
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3.1.1 Risk assessment       9 Considerations of       Preliminary NRA       2 Prioritisation of proposals for new work         13 Component of RM       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link t					documented and	4 Definitions	
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3.1.1 Risk assessment       9 Considerations of       Preliminary NRA       2 Prioritisation of proposals for new work         13 Component of RM       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link t					available in timely		
41)       13 adaptation of existing RA definitions         13 adaptation of existing RA definitions       13 adaptation of existing RA definitions         5 Principles for NRA       14 three components + problem formulation as preliminary risk management activity         3 Risk Assessment Policy       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6         13 Component of RM       5 Principles for NRA       14 three components + problem formulation as preliminary risk management activity         13 Component of RM       8 as CCFA, para 6       3.1.1 Risk assessment policy for the conduct of the risk analysis       9 Considerations of CCPR when preparing       2 Prioritisation of proposals for new work         14 Aims of RA policy       33 JECFA agenda - work device work device to PA bended       10 Link to risk       10 Link to risk       10 Link to risk       10 Link to risk						12 New definitions	
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       9 Considerations of       13 adaptation of existing RA       14 three components +         13 adaptation of existing RA       14 three components +       problem formulation as       14 three components +       14 three components +         13 adaptation of existing RA       14 three components +       14 three components +       14 three components +       15 reliminary risk       16 reliminary risk         13 Component of RM       33 JECFA agenda -       Preparation of risk       10 Link to risk       10							
A Aims of RA policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment policy       3. Risk assessment policy       14 three components + problem formulation as preliminary risk management activity         13 Component of RM       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment policy       3. Risk assessment policy       Preliminary NRA       2 Prioritisation of proposals for new work         14 Aims of RA policy       33 JECFA agenda - Uraphanian of risk       10 Link to risk       10 Link to risk       10 Link to risk       10 Link to risk       2 Description of risk preparing       2 Description of proposals for new work					,	13 adaptation of existing RA	
S Principles for NRA14 three components + problem formulation as preliminary risk management activity3 Risk Assessment Policy 13 Component of RM6 Minimum quality criteria for data - priority list8 as CCFA, para 6 JECFA3.1.1 Risk assessment policy for the conduct of the risk analysis3. Risk assessment policy9 Considerations of CCPR when preparing to the dependent of the Menal data to RA policy2 Prioritisation of proposals for new work14 Aims of RA policy 14 Aims of RA policy33 JECFA agenda - workPreparation of risk 10 Link to risk10 Link to risk10 Link to risk0 Link to risk							
A Risk Assessment Policy 13 Component of RM6 Minimum quality criteria for data - priority list8 as CCFA, para 6 JECFA3.1.1 Risk assessment policy for the conduct of the risk analysis3. Risk assessment policyPreliminary risk management activity2 Prioritisation of proposals for new work14 Aims of RA policy 14 Aims of RA policy3.3 JECFA agenda - ustk deachumithPreparation of risk risk management10 Link to risk10 Link to risk0 Link to risk0 Link to risk0 Link to risk0 Link to risk							
A spectrum       S as CCFA, para 6       S as CCFA						5 Principles for NRA	
A spectrum       S as CCFA, para 6       S.1.1 Risk assessment policy       S. Risk assessment policy       Preliminary risk management activity         13 Component of RM       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6       S.1.1 Risk assessment policy of the conduct of the risk analysis       3. Risk assessment policy       Preliminary NRA       2 Prioritisation of proposals for new work         13 Component of RM       33 JECFA agenda - priority list       Preparation of risk       10 Link to risk       10 Link to risk       9 Considerations of CCPR when preparing       10 Link to risk       2 Description of priority list						14 three components +	
A Risk Assessment Policy     6 Minimum quality criteria for data - priority list     8 as CCFA, para 6 JECFA     3.1.1 Risk assessment policy for the conduct of the risk analysis     3. Risk assessment policy     Preliminary risk management activity     2 Prioritisation of proposals for new work       13 Component of RM     33 JECFA agenda - priority list     Preparation of risk same of risk     10 Link to risk     10 Link to risk     0 Considerations of CCPR when preparing     Nutritional problem     2 Description of priority list						•	
A Risk Assessment Policy       6 Minimum quality criteria for data - priority list       8 as CCFA, para 6 JECFA       3.1.1 Risk assessment policy for the conduct of the risk analysis       3. Risk assessment policy       Preliminary NRA       2 Prioritisation of proposals for new work         14 Aims of RA policy       33 JECFA agenda - USA agenda - BA obsultibut       Preparation of risk user to absolute to RA       10 Link to risk       10 Link to risk       10 Link to risk       10 Link to risk       Nutritional problem       2 Description of priority list							
3 Risk Assessment Policy       6 Minimum quality       8 as CCFA, para 6       3.1.1 Risk assessment       3. Risk assessment       Preliminary NRA       2 Prioritisation of         13 Component of RM       priority list       JECFA       JECFA       of the risk analysis       9 Considerations of       15 Refer to WP without       2 Description of         14 Aims of RA policy       33 JECFA agenda -       Preparation of risk       10 Link to risk       10 Link to risk       10 Link to risk       Nutritional problem       2 Description of							
criteria for data - priority list       criteria for data - priority list       policy for the conduct of the risk analysis       policy       15 Refer to WP without citing directly.       proposals for new work         14 Aims of RA policy       33 JECFA agenda - work disable with       Preparation of risk user to abaculate to RA obsolution       10 Link to risk       10 Link to risk       9 Considerations of CCPR when preparing the priority list for the risk in RAP       Nutritional problem       2 Description of priority list for priority list for the	3 Risk Assessment Policy	6 Minimum quality	8 as CCFA, para 6	3.1.1 Risk assessment	3. Risk assessment		2 Prioritisation of
13 Component of RM       priority list       JECFA       of the risk analysis       15 Refer to WP without       work         14 Aims of RA policy       33 JECFA agenda -       Preparation of risk       10 Link to risk       CCPR when preparing       2 Description of         15 Mandata to DA should       work description       arity is priority list       arity							
14 Aims of RA policy 15 Mandeta to DA should work aleash with a concentration of risk 15 Mandeta to DA should work aleash with a concentration of risk and the risk area of the preparing the preparent the preparent the preparing the preparin	13 Component of RM		JECEA		20103	15 Refer to WP without	
14 Aims of RA policy 33 JECFA agenda - Preparation of risk 10 Link to risk CCPR when preparing 2 Description of risk is priority list for IMDB					9 Considerations of		
15 Mondete to DA should work cleasely with programment	14 Aims of PA policy	22 IECEA agondo	Bronaration of risk				2 Description of
	15 Mandate to RA should		-			Nutritional problem	
dssessifient Duicy		work closely with	assessment	assessment policy	its priority list for JMPR	Nutritional problem	prioritisation process
	be clear				40.0000	tormation	
priorities 20 as CCFA 33 and 34 3.1.2 Establishment of best series 40 Where a chivities activities		priorities	20 as CCFA 33 and 34	3.1.2 Establishment of			
background into and to why? activities	16 Risk management					16 Why?	activities
splions and risk 54 Findity also to 11 as CCLA, para 16 · · · · · · · · · · · · · · · · · ·	options and risk		11 as CCFA, para 18		reasons (WP para 15)		
		those known or				17 What to include?	3 CCFH develop risk
those known or 17 What to include? 3 CCFH develop risk		expected problems,					profile.

<b></b>					I
	emergency or public	11 CCRVDF role in	11 CCPR may refer RM	18 Examples of information	4 Marshan wishing t
	health risk	establishing priority list	options (WP para 16)	to be gathered.	4 Members wishing to
	(wonder if 33 and 34				include new item in
	could be combined)	12 Criteria for being on	12 CCPR to request		priority list should
		the priority list	JMPR to review RA		prepare project
	16 Communication		policies, methods and		document and
	of CCFA and	13 CCRVDF takes into	guidelines considered		preliminary risk profile.
	JECFA to prioritise	account protection of	by CCPR		
	additives to achieve	info under TRIPS -			5 CCFH responsible for
	the best available	makes every effort to	13 CCPR to clearly state		developing the RM
	risk assessment	encourage data	when it uses other		questions for JEMRA
	(what does this add	disclosure to JECFA –	legitimate factors and		
	to 17)		why.		6 When referring
		(WP, para 6)			pathogen commodity
	17 Considerations of		14 JMPR applies		combinations CCFH
	CCFA when	3.1.3 Establishment of	transparent, science		may also refer MRM
	prioritising for	a preliminary risk	based RA process for		options
	JECFA	profile	ADI/ARfD		-
					8 When commissioning
	18 CCFA to provide	14 Member establishes	15 JMPR with CCPR		scientific advice CCFH
	background	dossier	explore minimum data		to follow structured
	information on		requirements.		approach in GL63 and
	substances for				ŴP
	review (WP para 15)	15 Requirements for	3.1 MRLs for specific		
		extrapolating to other	groups		9 Considerations when
		species	3		seeking risk
			3.1.1 MRLs for foods		assessment - sufficient
		16 CCRVDF considers	of animal origin		knowledge/data
		preliminary risk profile	5		available - expectation
		and decides if to include	Paras 17-19		that results will assist
		on priority list			RM – previously done
			3.1.2 MRLs for fat-		risk assessments
		(could this be a	soluble pesticies		
		subsection of 3.1.2 as it			10 If the CCFH decides
		belongs to establishing	Paras 20-22		to seek risk assessment
		the priority list?)			Will submit to
			3.1.3 MRLs for spices		FAO/WHO risk profile,
					risk assessment policy
		3.1.4 Ranking of the	Para 23		(as appropriate).
		hazard for risk	1 414 20		FAO/WHO will evaluate
		assessment and risk	3.1.4 MRLs for		request and either
		management	processed and ready-		agree or not to
			to-eat foods		undertake risk
		17 Ad-hoc CCRVDF			assessment
		working group finalises	Paras 24-25		assessment
		priority list and develops	1 0103 24-25		
		questions to be asked to	3.2 Establishment of		
		JECFA.	EMRLs		
			Paras 26-30		
	I	1	1 4140 20 00		

				1	1	1
			18 CCRVDF approves			
			priority list and forwards			
			to CAC for approval.			
			(could this be a			
			subsection of 3.1.2 as it			
			belongs to establishing			
			the priority list)			
Risk Assessment	JECFA	Risk assessment	6 Selection of experts	4. Risk assessment	Nutritional Risk	4 Risk assessment
			for JECFA		Assessment	
17 Scope and purpose	22 JECFA selection	21 as CCFA, para 22		4.1 Role of JMPR		
should be clearly defined	of experts (WP, para	2 : do 00: / i, paid 12			19 Reference to WP as	
should be clearly defined	18)	22 as CCFA, para 23 +	3.1.5 Commissioning	31 JMPR description	generally applicable.	11 FAO/WHO will
40 Oritoria fan Calastian of	18)		of the risk assessment	ST SIMPR description	generally applicable.	
18 Criteria for Selection of		Give risks associated				ensure that selection of
experts	23 JECFA to	with different levels of	19 After CAC approval	32 JMPR outputs	Nutrient-related Hazard	experts is in line with
	provide CCFA with	dietary exposure	CCRVDF forwards list		Identification and hazard	FAO/WHO framework
19 RA in accordance with	RA including 4 steps			33 JMPR provide	characterization	for the provision of
statements of principle and	of RA. (WP para 19)	23 as CCFA para 27	to JECFA may also	CCCPR with RA		scientific advice on food
incorporate the 4 steps of	+		forward RM options.	including 4 components	20-26 Description of	safety and nutrition and
RA	For Food additives	24 as CCFA para 29		of RA (WP, para 19)	assessment of situations of	GL30
	continue current	•	3.2 Consideration of		inadequate or excessive	
20 RA based on all	procedure for	Communication with	the result of the risk	34 JMPR to inform on	intake. Reference to global	12 JEMRA should: base
available scientific data -	establishing ADI	CCCF	assessment	applicability and	FAO/WHO standards and	RA on data from
quantitative and may take	establishing ADI	8081	uccocciniciti	constraints of RA and	regional standards.	different parts of the
					regional standards.	
into account qualitative	24 JECFA to	25 as CCFA para 24	20 Detailed JECFA	vulnerable groups (WP		world including
information	provide science		report indicating choices	para 25)	Nutrient-related intake	developing countries
	based quantitative	26 as CCFA para 25	made and uncertainties.		assessment and risk	(WP para 22);
21 RA should take into	RA (WP para 20)			35 JMPR to	characterization	Communicate to CCFH
account relevant production,		27 JECFA to provide	21 M/han incomplete	communicate		on applicability and
handling and storage	25 JECFA to inform	CCCF with scientific	21 When incomplete	uncertainties (WP, para	27 Populations relevant	constraints (WP para
practices throughout food	on applicability and	view on validity of data	data JECFA may	25)		25); communicate
chain	constraints of RA	used for exposure	propose temp MRL	,	28 Total diet context	magnitude and source
	and vulnerable	assessment (WP para	which sold not proceed	4.2 Dietary intake		of uncertainties (WP
22 Relevant data from	groups (WP para	24)	to step 8	nz biotary intano		para 25); communicate
different parts of the world	25)	27)		36 JMPR responsible to		assumptions (WP para
	23)	00 as CCEA	22 JECFA report be			
including developing		28 as CCFA, para 30	made available	evaluate exposure to		25)
countries	26 JECFA to assess			pesticides; global data;		
	identity and purity of	29 as CCFA 31	sufficiently early.	developing countries;		13 FAO/WHO will
23 Constraints,	FA			GEMS/food (PM, para		provide results to CCFH
uncertainties and		30 as CCFA 32	23 JECFA outline	22)		in format to be decided.
assumptions should be	27 JECFA to use		different RM options -			May provide scientific
quantified as much as	global data including		clearly distinguish	37-43 More on dietary		expertise on guidance
possible	from developing		between risk	intake		on interpretation of RA
	countries, exposure		assessment and			(WP para 26)
24 RA to be based on	studies (WP para		evaluation of RMO.			14 RA carried out by
realistic exposure scenarios	22)					JEMRA operate under
	<i>~~</i> )					framework of GL30
- RA policy			24 CCRVDF may ask			
05 Demonstration 11 is st	28 JECFA		additional questions			(duplication of 11?)
25 Report should note the	responsible for					
constraints, uncertainties	evaluating exposure					
and assumptions and	to FA					
			L	L	1	ı I

minority opinions - RM to resolve not RA 26 Report of RA provided in readily readable from to RM and other risk assessors	<ul> <li>29 JECFA to take into account regional/national consumption patterns (WP para 21)</li> <li>30 JECFA to communicate to CCFA any uncertainties (WP para 23, 25)</li> <li>31 JECFA to communicate basis for assumptions (WP para 23)</li> <li>32 JECFA to communicate outcome in clear manner (WP para 26) - not deal with consequences on trade - and if it give options should be in line with WP and the present text</li> </ul>		<ul> <li>25 Both JECFA and CCRVDF process should be clearly documented</li> <li>26 A delegation may ask JECFA for additional explanation (Concern form)</li> <li>3.3 Using the concern form</li> <li>27 Definition of concern form</li> <li>28 Procedure to use the concern form</li> </ul>			
Risk Management	CCFA	CCCF	3.4 Evaluation of RMO	5. Risk Management	Nutritional risk	5 Risk management
<ul> <li>27 Recognise dual mandate; primary objective health; avoid differences for same risk</li> <li>28 Structured approach of RM; other legitimate factors; Second statement of principle</li> </ul>	<ul> <li>8 CCFA bases RM on JECFA</li> <li>9 Additional request to JECFA</li> <li>10 Relation to GFSA</li> <li>11 CCFA bases RM on JECFA and Other legitimate factors (WP para 28)</li> </ul>	Communication with JECFA 9 as CCFA, para 16 10 as CCFA, para 17 12 as 19 for CCFA (WP para 16) 13 as 19 for CCFA	<ul> <li>29 Other legitimate factors</li> <li>(Reference is made to a Committee report and possible amendments should the text of the committee decision be included here?)</li> <li>30 Options for the CCRVDF: recommend MRLs based on JECFA,</li> </ul>	<ul> <li>5.1 Role of CCPR</li> <li>44 CCPR recommends RM proposals such as MRLs for CAC</li> <li>45 CCPR base on JMPR and other legitimate factors (WP, para 28)</li> <li>46 Additional request to JMPR</li> </ul>	<ul> <li>management</li> <li>29 WP apply with additions.</li> <li>30 NRM can be quantitative or qualitative should take into account impact and consumer behaviour.</li> <li>31 NRA policy should be formulated before conduct.</li> </ul>	<ul> <li>15 RM options may include provisions from Codex texts</li> <li>16 MRM option recommended to CACshold be based on the policies in the following paras and take into account JEMRA assumptions and uncertainties</li> <li>17 GL and COP can</li> </ul>
29 Risk assessment should be complete when taking	12 CCFA to take into account uncertainty	14 as 9 for CCFA Risk management	recommend extrapolation to other species, modify MRLs	47 CCPR to take into account uncertainty		include micro criteria or other metrics as in Annex II of GL63)

decisions on RM refer to			considering other	48 CCPR shall only	
para 10 when uncertainty	13 CCFA shall only	15 as CCFA para 10	legitimate factors,	endorse MRL	18 Additional request to
	endorse level for	•	request JECFA to	recommended by JMPR	JEMRA
	additives for which	16 CCCF base on	reconsider. decline to		-
	JEMPR has:	JECFA + uncertainties +	advance the MRLs;	49 CCPR base on	19 CCFH decides on
	established identity	other factors (combines	develop RM guidance	global scale	case by case basis if
30 Take into account				0	
relevant practices; feasibility	and purity	paras 8, 11, 12 and 15	for those without ADI	consumption patterns;	COP or GL or MC or
of enforcement; compliance;	specifications and	of CCFA)	and refer options to	GEMS/food for chronic	other metrics
prevalence of adverse	completed RA (WP,		JECFA for advice	exposure	
health effects	para 29)	17 Conditions for CCCF			20 Other legitimate
		endorsing ML and link to	31 Attention to	50 If there are no	factors in line with
	14 CCFA takes into		availability of analytical	methods of analysis to	statements of principle.
	account regional	"Codex Policy for	methods for residue	enforce MRL then none	Clearly state when
21 DM process transport	and national food	Exposure of	detection	will be established.	used. (WP para 28)
31 RM process transparent	consumption		detection		
<ul> <li>fully documented</li> </ul>	differences as	Contaminants and		5.2 Selection of	21 CCFH establish MC
	assessed by JECFA	Toxins in Foods)"	3.4 Monitoring and	pesticides for JMPR	if quantitative RA is
	assessed by JLCFA		review of the	evaluation	possible taking into
		This should probably	decisions taken	evaluation	
32 Outcome of preliminary	15 CCFA shall state	read: "Policy of CCCF			account regional
RM and risk assessment	clearly if uses other	for exposure		51 CCPR/JMPR agree	national food
combined with evaluation of	factors (could this	assessment of	(this should probably be	on schedule each year	consumption patterns
available RM to reach	be added to 11)	contaminants and toxins	3.5)		and dietary exposure.
decision.				5.2.1 Procedure for the	GL21 to be used as
decision.	19 CCFA may	in foods or food groups"	32 Members may ask	preparation of the	guidance.
	provide risk		for review of decisions -	schedules and priority	
For the purpose of these	management	17bis Reference to MLs	in particular if difficulties	lists	22 Where MC
Principles, preliminary risk	options to obtain	to distinguish food fraud	in application of GL71		established – methods
management activities are	JECFA guidance	(should be numbered		52-60	of analysis and
taken to include:	(WP para 16)	continuously)		02 00	sampling to be
identification of a food		continuouoly)	33 CCRVDF may	5.2.2 Nomination	provided.
safety problem;	20 CCFA refers		request JECFA to	requirements and	provided.
establishment of a risk		18 as para 14 CCFA	review in light of new		
profile; ranking of the	methods for		scientific info	criteria for the	
hazard for risk assessment	assessing maximum	19 Before finalising ML		prioritisation and	
and risk management	use levels	CCCF to ask JECFA on		scheduling pesticides	
priority; establishment of		method/sampling validity	34 Risk assessment	for evaluation by	
		(similar to para 20	policy to be	JMPR	
risk assessment policy for			reconsidered on the		
the conduct of the risk		CCFA)	basis of experience	New pesticides	
assessment; commissioning					
of the risk assessment; and				Nomination/prioritisation/	
consideration of the result of				scheduling	
the risk assessment.				schedding	
				Paras 61-63	
33 Assess RM options by				Faias 01-03	
				5000	
level of consumer				5.2.3 New uses of	
protection. Consider option				pesticides previously	
of not taking action.				reviewed by JMPR	
34 Avoid trade barriers - RM				Nomination/prioritisation/	
options that lead to equal				Scheduling	
protection shall be				-	
protoction shall be				I	

evaluated by which is least			Paras 64-66		
trade restrictive					
			5.2.4 Other		
			Evaluations		
35 RM take into account			Evaluations		
economic consequences					
and feasibility of RM			Nomination/prioritisation/		
options. Need for			scheduling		
alternatives. Take into					
account situation of			Paras 67-70		
developing countries			5.2.5 Periodic review		
36 RM continuing process			Paras 71-77		
to incorporate new science.					
			5.2.6 Periodic review		
			procedure		
			P		
			Paras 78-81		
			5.3 Elaboration		
			procedure		
			<b>D</b> 00.07		
			Paras 82-87		
			5.4 Revocation of CXLs		
			Darea 00.00		
			Paras 88-90		
			5.5 Procedure for		
			submitting concerns		
			and clarifications		
			<b>D</b> 04 400		
			Paras 91-102		
Risk communication		4 Risk communication	6 Risk communication	Nutritional risk	6 Risk communication
		in the context of risk		communication	
			102 CCPR and IMPR	communication	22 Potoropoo to W/P
37 8 goals of RC:		management	103 CCPR and JMPR		23 Reference to WP
awareness and			ensure transparency,	32 WP apply.	and CCFH and JEMRA
understanding,		35 as WP, para 38	documentation of RA		to use guidance in 24-
transparency and			process and timely		29
consistency; sound basis for			availability of results		
		36 CCRVDF provides	(partly duplicates 8)		24 CCFH may provide
understanding of RM		comments on risk	()		comments on the
decisions; improve		assessment guidelines	104 CCPR provide		guidelines related to
effectiveness and efficiency;		of JECFA			
strengthen working			comments on the		assessment procedures
relations; foster public			guidelines related to		being drafted or
understanding; involvement			assessment procedures		published by JEMRA
of all interested parties;			by JMPR		
exchange of information of			-		7 Interaction between
exchange of information of					Risk manager (CCFH)
				1	

		1	
parties on risks associated	105 CCPR/JMPR		and Risk assessor
to food	recognise essential		(JEMRA)
	need for communic	ation	
38 Clear interactive and	(WP para 38)		25 CCFH recognises
documented			need for interactive
	106 CCPR/JMPR		process between RA
Communication between	continue develop		and RM to assess
Risk assessors (joint	procedures to enha	200	feasibility of RA and
FAO/WHO bodies) and risk	communication	nce	
managers (Codex) and all	communication		that RA policy is clear
interested parties			and the RM questions
			asked by CCFH are
39 Make sure that all			appropriate.
needed information and			
			26 When benefit from
opinion is available for RM			interaction with other
process			Codex committees,
			expert consultations
40 Transparency about Risk			and/or other
assessment policy and			international scientific
uncertainty refer to para 25.			bodies this should be
			included
41 Information not only for			(shorten?)
those in the process but			
also other interested parties			
while respecting concerns			27 CCFH/JEMRA
for confidentiality - refer to			communications timely
para 6.			and effective
para or			(repetition of 23)
			<b>、 、 、 ,</b>
			28 CCFH likely to
			receive questions from
			JEMRA and vice versa.
			(does this add
			anything?)
			29 CCFH may
			recommend
			discontinuation or
			modify work if (a)
			completion of RA not
			feasible (b) not possible
			to provide MRM options
			30 CCFH and JEMRA
			to ensure that their
			respective contributions
			result in outputs that are
			scientifically based, fully
			transparent,
			documented and

			available in timely
 Additional text	Additional texts	Additional texts	manner
Policy of CCCF for exposure assessment	Template for priority list Concern form Risk assessment policy for the setting of MRL for RVDF	Annex A: Concern form (advancement) Annex B: Concern form (Periodic review) Annex C: Proportionality concept Annex D: Minor crops Annex to Annex D	