



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

Thirty-second Session

Bordeaux, France, 23 - 27 March 2020

PROCEDURAL GUIDANCE FOR COMMITTEES WORKING BY CORRESPONDENCE
(Replies to CL 2019/115/OCS-GP)

Comments of Brazil, Costa Rica, Egypt, Guatemala, Japan, Kenya, Netherlands, Norway, The Philippines, USA.

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2019/115/OCS-GP issued in December 2019 with a deadline for submission of comments on 16 February 2020.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

ANNEX I

COMMENTS ON THE PROCEDURAL GUIDANCE FOR COMMITTEES WORKING BY CORRESPONDENCE
(Replies to CL 2019/115/OCS-GP)

GENERAL COMMENTS		
G	(General Comment)	<p>Senegal Senegal broadly agrees with the recommendations of the electronic working group on CWBC and requests inclusion of the rationale for dispensation of responsibility for the cost of interpretation services and the translation of documents. <i>Category: TECHNICAL</i></p>
G	(General Comment)	<p>Brazil Brazil appreciates the excellent work done by the co-chairs of the electronic working group and would like to provide the following comments.</p> <p>In general, Brazil agrees with the analysis and proposals on criteria and procedural guidance for committees working by correspondence however emphasizes the importance of having clear criteria on voting, including how to proceed with the vote, since it mostly happens through secret ballot. Considering that the 21th Session of the Coordinating Committee for Latin America and Caribbean (CCLAC) had to be suspended, pending issues from that meeting are being dealt by correspondence in the electronic forum and therefore we might have new elements to discuss before advancing with the development of a procedural guidance. We are looking forward to continue participating on the upcoming discussions <i>Category : SUBSTANTIVE</i></p>
G	(General Comment)	<p>Guatemala Guatemala acknowledges the good work carried out by this electronic working group and agrees with most of the opinions, recommendations and general conclusions that it has tabled. Issues such as determining a quorum, criteria for the assignment of appropriate work to CWBC, expressing reservations and others have been very well addressed. We are</p>

		<p>keenly awaiting the results of the CCLAC21-Part II session which, as matters stand, appear promising as regards work by correspondence and, of course, the conclusions that will be reached at the next CCGP session. Best regards.</p> <p><i>Category: EDITORIAL</i></p>
G	(General Comment)	<p>Costa Rica</p> <p>Costa Rica wishes to take the opportunity of congratulating the chair and co-chairs of this EWG for its work which clearly reflects and consolidates the concerns raised by the countries.</p> <p>Regarding the document's content, Costa Rica welcomes the opportunity to make comments and, in this respect, wishes to express its support for the proposals put forward with the following amendments:</p> <p><i>Category: SUBSTANTIVE</i></p>

1	INTRODUCTION	<p>USA</p> <p>General comment: The U.S. supports maintaining the option of committees working by correspondence in Codex and generally believes that the same rules should apply to such work as apply to committees that conduct physical meetings. Additional clarification on certain points will be useful in helping the Commission to decide when work by correspondence is appropriate and in guiding chairpersons and members on their roles and participation. The United States believes that new procedural guidance should be limited to those areas requiring clarification due to the mode of work and should reference existing rules and guidance applicable to all committees as appropriate.</p> <p>It is also worth noting that both CCPFV and CCLAC are basically piloting approaches to CWBC. It may be best for the guidance not to be too restrictive until more experience is gained.</p> <p><i>Category : SUBSTANTIVE</i></p>
1	INTRODUCTION	<p>Norway</p> <p>Norway would like to thank the chair and co-chairs for an excellent paper. We have carefully scrutinized the proposals</p>

		and have a few comments and questions we would like to address. <i>Category : SUBSTANTIVE</i>
8	An email inviting registrations was posted on the EWG Forum on 1 May 2019. Registrations included one member organization (the European Union), 21 member countries ³ , four observer members ⁴ and the World Health Organization, a Codex parent organization.	USA Editorial: Delete the word "parent" and insert the word "founding". <i>Category : EDITORIAL</i>
15	Comments were submitted on the EWG Forum by one member organization (the European Union) and 9 member countries ⁶ and one observer (the International Dairy Federation).	USA Begin the paragraph with the following text: "During the second round on consultation, comments ..." <i>Category : SUBSTANTIVE</i>
20	In recent years, several Codex committees that had previously been adjourned <i>sine die</i> were reactivated to undertake specific and discrete items of work by correspondence. Examples include the following:	USA Insert the text "that had previously been" between "committees" and "adjourned". <i>Category : SUBSTANTIVE</i>
22	Codex Committee on Milk and Milk Products (CCMMP) reactivated to work by correspondence on developing to develop a standard for processed cheese and a standard for dairy permeate powders; and	USA Suggested edits <i>Category : EDITORIAL</i>
23	Codex Committee on Cereals, Pulses and Legumes (CCCPL) reactivated to work by correspondence on developing to develop a standard for quinoa.	USA Suggested edits <i>Category : EDITORIAL</i>
30	In 2018, the Codex Committee on Processed Fruits and Vegetables (CCPFV) met electronically through an electronic user group called "CCPFV-online" using the Codex electronic forum in order to complete three specific tasks laid out for CCPFV by CAC40 (2017). The invitation to CCPFV29 (working by correspondence) was issued by the Director General of the Food and Agriculture Organization (FAO) and the Director General of the World Health Organization (WHO) and was circulated to Codex members and observers with the provisional agenda in accordance with the Procedural Manual¹⁴.	USA Substantive Comment: The text crossed out here describes the invitation to the 29th session of the CCPFV which is being held by correspondence starting on January 2, 2020. This is a separate issue from the CCPFV-online activity from 2018. The U.S. has moved this text into Para. 2.7. <i>Category : SUBSTANTIVE</i>
32	Twenty countries, one member organization, and seven observer organizations joined CCPFV-online. CCPFV-online used the results of an online survey and other inputs to develop recommendations for each of the three tasks. These recommendations were presented to CAC41 in a report. CAC41 endorsed continuing with the next steps that CCPFV-online had recommended. In short, CCPFV successfully used the electronic meeting forum to complete the specific tasks it was assigned while using resources efficiently. Participation to date in some of the CCPFV EWGs has been low; however, that may change when the full committee reviews the EWG reports and conclusions with respect to the standards under development. CAC42 approved the CCPFV	USA Substantive Comment: The added text provides an update to the activities of the CCPFV. The footnote referenced after the words "Procedural Manual" appears incorrect; it refers to meetings of the CAC. The reference for the invitation and provisional agenda for committees is in Section III, Guidelines for Subsidiary Bodies, in the Procedural Manual (p. 101, 27th edition). <i>Category : SUBSTANTIVE</i>

	<p>chairperson's recommendations to continue working by correspondence, reconvene CCPFV-online, and assess whether a physical meeting in 2020 would be appropriate based on the progress of the work¹². <u>2.7 Based on the approval by CAC42 to continue working by correspondence, CCPFV arranged to hold its 29th session (CCPFV29) by correspondence using the Codex Online Forum as the venue, and to parallel the activities of a physical meeting as much as practicable. In September 2019, an invitation to CCPFV29 (working by correspondence) was issued by the Director General of the Food and Agriculture Organization (FAO) and the Director General of the World Health Organization (WHO) and was circulated to Codex members and observers with the provisional agenda in accordance with the Procedural Manual. Circular Letters (CLs) were distributed inviting members and observers to comment on five draft standards via the Online Commenting System (OCS) and on matters referred from CCFA and CCMAS. A provisional agenda and working documents were posted on the Codex website established for the meeting. The CCPFV Chair posted a welcome and introductory message on the Codex Online Forum for CCPFV29, establishing that activities at the forum site would begin on January 2, 2020, and providing a schedule for the four month meeting. The session began on January 2, 2020, and is currently in progress, working in the three languages used by CCPFV.</u></p>	
32	<p>Twenty countries, one member <u>one-member</u> organization, and seven observer organizations joined CCPFV-online. CCPFV-online used the results of an online survey and other inputs to develop recommendations for each of the three tasks. These recommendations were presented to CAC41 in a report. CAC41 endorsed continuing with the next steps that CCPFV-online had recommended. In short, CCPFV successfully used the electronic meeting forum to complete the specific tasks it was assigned while using resources efficiently. Participation to date <u>in</u> some of the CCPFV EWGs has been <u>was</u> low; however, that may change when the full committee reviews the EWG reports and conclusions with respect to the standards under development. CAC42 approved the CCPFV chairperson's recommendations to continue working by correspondence, reconvene CCPFV-online, and assess whether a physical meeting in 2020 would be appropriate based on the progress of the work¹².</p>	<p>USA Suggested edits <i>Category : EDITORIAL</i></p>
42	<p>CCGP31 reviewed the discussion paper which, after consultation with the Codex Secretariat, had been prepared by the legal offices of FAO and WHO and established an EWG charged with developing criteria to identify work appropriate to be undertaken by CWBC and procedural guidance for CWBC. The criteria is <u>are</u> to be consistent with relevant guidance in the <i>Procedural Manual</i> (including decision making, and reporting) and in keeping with the values of the Commission. After considering these items of work, the EWG was asked to make recommendations as appropriate on whether procedural changes related to CWBC are necessary.</p>	<p>USA Suggested edit <i>Category : EDITORIAL</i></p>

46	Discussions thus far in the Executive Committee and the Codex Alimentarius Commission (CAC) acknowledge the usefulness of CWBC as one of several mechanisms available to CAC to advance its work. However, members also recognized that CWBC posed specific challenges and procedural issues that need to be addressed if it is to be recognized and accepted as an efficient and appropriate option for advancing Codex work. Some of the specific issues that need to be addressed <u>and clarified as appropriate</u> include:	USA Inserted text <i>Category : SUBSTANTIVE</i>
55	6.1 Having a clear set of criteria for the assignment of appropriate work to <u>a CWBC</u> is an essential pre-requisite and critical first step in deciding on the mechanism for advancement of an item of work. Without prejudice to the provisions of paragraph 6.2 below, a clear set of criteria should be established for the <u>appropriate work of each by a</u> CWBC.	USA added and deleted text. <i>Category : SUBSTANTIVE</i>
56	Any criteria would be used by the Commission in making a decision on whether a CWBC will proceed (alongside the Commission's decision on a proposal for new work or <u>ongoing work or revision</u>). As with any new work proposal, all Member countries (and observers) are <u>should be</u> provided with the opportunity to comment. <u>This could be achieved via a Circular Letter (CL).</u>	USA It may be appropriate to complete work by correspondence if the agenda of the committee does not merit a physical meeting. It is not clear how comments would be obtained for committees that have been adjourned. <i>Category : SUBSTANTIVE</i>
56	Any criteria would be used by the Commission in making a decision on whether a CWBC will proceed (alongside the Commission's decision on a proposal for new work or revision). As with any new work proposal, all Member countries (and observers) are provided with the opportunity to comment.	The Philippines We support this criterion but as for the new work, the Philippines prefers that approved new work be discussed in the relevant subsidiary bodies as the current practice (not referred for CWBC), so that the subsidiary bodies can take advantage of the opportunity of dynamism generated by physical participation in the subsidiary body.
57	To date, CWBC has only been implemented for commodity standards (and therefore there was an inherent focus on commodity committees in considering the correspondence setting). It is, however, important to recognise that while commodity committees may dominate the requests to work in this setting to date, it is reasonable that the criteria developed should apply broadly to all Codex committees to ensure they are relevant and durable. On a related note, while the criterion listed below on 'amenability of the work to standardisation' strongly relates to commodity committees, there is no reason to exclude non-commodity committees as the criterion is also applicable to horizontal work.	Netherlands 6.3. As finishing work in a CWBC is more difficult, the threshold for 'amenability of the work to standardisation' should be higher. E.g. the work on processed cheese in CCMMP should not have been taken up by a CWBC as 'intractable differences did not come as a surprise as they were highly evident at previous physical meetings...'. <i>Category : SUBSTANTIVE</i>
58	It is worth noting at the outset that CWBC will generally be the exception rather than the rule and should only be considered in specific circumstances or situations. These could include such factors as the status of the committee and its work programme. When the Commission is faced with a request to commence work in an area that falls within the	USA Added text <i>Category : SUBSTANTIVE</i>

	<p>terms of reference of a committee adjourned <i>sine die</i> (or which has completed all work in the step process and has not set a date for a future meeting meeting such as in the case of CCPFV), it has the option of either reconvening the committee or assigning that work to another committee that is actively meeting¹⁷. The latter approach was adopted in the case of histamine work which was assigned to the Codex Committee on Food Hygiene (CCFH) when the Codex Committee on Fish and Fishery Products (CCFFP) adjourned. If the Commission decides to assign the work to the committee that has the mandate for that area of work, the next issue for determination is the mode of operation: whether to reactivate the committee and request that the previous host provide for physical meetings, or whether to reactivate it to conduct work by correspondence.</p>	
60	<p>The determination of the mode of operation has, for the few times that it was made, generally been made taking into account <u>consideration</u> the workload of the committee, sometimes without sufficient regard to the complexity of the work and prospects for advancement by electronic means. This was indeed the situation that was faced by the Commission when presented with renewed calls for restarting work on processed cheese. The issue of developing a revised standard for processed cheese had been discussed in CCMMP without success over a period of 18 years. During that time, numerous physical meetings of the committee failed to make progress on core elements of the standard. When CCMMP was adjourned <i>sine die</i> in 2010 having completed its work programme, the Commission also revoked the existing standards for processed cheese products, as recommended by CCMMP.</p>	<p>USA Suggested edit Category : <i>SUBSTANTIVE</i></p>
61	<p>The Commission later decided to restart work on a revised standard for processed cheese and agreed to reactivate CCMMP to work by correspondence on this issue, given continuing interest in this work and recognising opportunities for possible physical meetings at the working group level. Some members expressed the view that this was unlikely to be successful, but the Commission nevertheless agreed to make a further attempt given the continuing interest from a number of <u>several</u> members.</p>	<p>USA Suggested edit Category : <i>SUBSTANTIVE</i></p>
64	<p>Proposal for criteria when deciding on work to be assigned to CWBC</p>	<p>USA Substantive Comment: The U.S. recommends that this section be revised to address only factors unique to CWBC and refer to the relevant sections of the PM for factors that apply equally to proposals for new work generally (notably, v, vi and viii below) and should be covered in project documents submitted for critical review. Category : <i>SUBSTANTIVE</i></p>
64	<p>Proposal for criteria when deciding on work to be assigned to CWBC</p>	<p>Norway Appreciate the criteria, however there might be a need to</p>

		<p>discuss further a grouping of the criteria and a template to be used in order to facilitate discussions of approval in EXEC and CAC</p> <p><i>Category : SUBSTANTIVE</i></p>
		<p>The Philippines</p> <p>The Philippines supports the proposed criteria as enumerated in Section 6.9.1 of CX/GP 20/32/4. We do acknowledge that the proposed criteria should be read in conjunction with existing Commission's Procedure for Elaboration of Codex Standards and Related Texts and Criteria for the Establishment of Work Priorities. But it is also important to read the text in line with Part 2. Critical Review – Proposal to Undertake New Work or to Revise a Standard.</p> <p>The Committee may also wish to evaluate later on whether there is a need to revise the current Codex procedures to include in the criteria the amenability of a proposed work to working by correspondence.</p> <p>We would like to submit the following specific comments on the proposed criteria:</p> <p>Since the assessment of a work to amenability for the CWBC in which the historical perspective of the standard should only be applicable for proposed revision of an existing Codex text and the new work should be put in the relevant committee to make room for the proposed standard to prosper there before the committee recommends CWBC.. We propose the revision of the proposed criterion to be read as:</p> <p>“nature and complexity of the proposed work. For proposed revision of a standard, the previous and recent history in Codex process should be taken into consideration”</p> <p>i. Potential for assigning the proposed work to a relevant existing Committee given CWBC should only be considered in specific circumstances or situations (consider whether the work</p>

		<p>could be progressed within a set timeframe such as 1-3 sessions)</p> <p>‘Specific circumstances’ might be too general and is open to various interpretations. Thus, we would like to recommend looking into the previous and recent history of a particular Committee in finishing its work following a proposed timeline. This can be used as one of the basis whether the nature of work of a Committee (i.e. based on standards developed by the Committee and how fast they develop a particular standard) is amenable for CWBC arrangement.</p> <p>Furthermore, we would like to be clarified what will constitute a ‘session’ for CWBC.</p> <p>ii. Philippines support the Codex procedure in this criteria for resource implication for Codex members, the Secretariat and the host, (whether the amount of work merits a lesser investment required for a meeting by correspondence, rather than expending the resource needed for a physical meeting)</p> <p>iii. The Philippines supports the inclusion of these considerations in the proposed criteria. There are cost implications also to Codex members in actively participating in a CWBC. This might include investing in IT related infrastructures, etc. and might cost more than participating in a physical meeting. The cost of translation of documents, in case it will be mandated as a task of the Codex members is another type of cost that may be incurred by member countries. The Philippine experience during the CCFICS 24th webinar on May 2018 validates the importance of the use of these new technologies and provides option for member countries to still actively participate in the elaboration of standards even though they are unable to attend physical meetings and thus should be included in 6.9.4.</p> <p>The committee may also evaluate the use of Real time technology (Webinar) for it has no physical contact and a</p>
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65	6.9.1 It is proposed that the Commission consider the following criteria as a whole (and not in isolation) when deciding on work to be assigned to CWBC versus meeting physically:	<p>Japan</p> <p>To respect and adhere to the Codex core values of collaboration, inclusiveness, consensus building and transparency and the Procedural Manual, physical meetings should be held in principle. When deciding on work to be assigned to CWBC, work falling within TORs of the active relevant committees should not be assigned to CWBC. Work falling within TORs of the committees which have been adjourned sine die and which will be able to meet physically for reactivation, should also not be assigned to CWBC. <i>Category : SUBSTANTIVE</i></p>

66	Nature and complexity of the proposed work, its previous and recent history in Codex (for example, this may include, amongst others, time-frame <u>timeframe</u> to develop the proposed work, diversity of stakeholders involved, characteristics of the proposed work and/or related factors);	USA deleted hyphen <i>Category : EDITORIAL</i>
67	Potential for assigning the proposed work to a relevant existing committee given that is <u>meeting physically</u> . CWBC should only be considered in specific circumstances or situations (consider <u>taking into consideration</u> whether the work could be progressed within a set timeframe such as 1-3 sessions);	USA added and deleted text <i>Category : SUBSTANTIVE</i>
70	Scope, objective and content of the proposed work assigned to the CWBC;	USA Apply to all new work <i>Category : SUBSTANTIVE</i>
71	Amenability of the work to standardisation;	USA Apply to all new work. <i>Category : SUBSTANTIVE</i>
73	Prospects for achieving consensus within the prescribed time-frame.	USA Applies to all new work. <i>Category : SUBSTANTIVE</i>
77	6.9.3 If there are proposals for new work that have not been reviewed by the relevant committee, CCEXEC (in the critical review process) and the Commission should carefully consider whether the project document meets the criteria in the <i>Procedural Manual</i> .	Netherlands 6.9.3. and 6.9.4 CCEXEC should always carefully consider whether the project document meets the criteria. And the procedure to start new work should for the sake of inclusiveness lead through more than CCEXEC, so wide circulation beforehand could increase the possibilities for success. <i>Category : SUBSTANTIVE</i>
78	6.9.4 Other possible ways to consult with committees members should be considered, e.g. circulation for comments prior to submission to CCEXEC, to increase inclusiveness and participation.	USA inserted members; deleted committees <i>Category : SUBSTANTIVE</i>
78	6.9.4 Other possible ways to consult with committees should be considered, e.g. circulation for comments prior to submission to CCEXEC, to increase inclusiveness and participation.	Norway New work proposals for work falling under the TOR of committees adjourned sine die should be circulated for comments through CLs in sufficient time before the CCEXEC/CAC. We consider such a procedure as crucial for the initial discussions before approving new work proposals, especially in connection with committees adjourned sine die. Without such a circulation it might be difficult to approve new work and for it to be successful, in terms of interested members, timeframes, the mode of work, the outcome and the use of the std.

		<i>Category : SUBSTANTIVE</i>
79	6.9.5 Resource implications for Codex members, the Secretariat and the host countries should also be considered.	Egypt Repeated under 6.9.1 (iii) <i>Category : TECHNICAL</i>
79	6.9.5 Resource implications for Codex members, the Secretariat and the host countries should also be considered.	Netherlands General comment on whole document: 6.9.5.; 7.5 i and ii (restricting possibilities of chair to discontinuation); ... A committee should always be held responsible for the needs of the committee it chairs. As in the PM: p.99: The Codex Alimentarius Commission will designate a member country of the Commission, which has indicated its willingness to accept financial and all other responsibility... Therefore something went procedurally wrong when in 2016 (CX/CAC 16/39/13 Add.2) it was stated that: <ul style="list-style-type: none"> • [a country], as host of [a committee], recommends a physical meeting [HOWEVER] • [a country] formally requests that consideration be given to vital support from the Commission through the Codex trust Fund or other multilateral financial mechanism to cover the incurred costs and expenses from holding a physical meeting. • [a country] states at this time it is unable to offer any indication on the possibility of assuming some of the costs associated with holding the meeting. At that point should the question then not have been if a country was prepared to take up this committee? The honour of hosting a committee comes with responsibilities. The question was never asked. The solution then was a committee working by correspondence/ eWG and the work in the end was discontinued. (In connection to this point, if a chairing country is allowed to state it is incapable of holding a physical meeting for financial reasons, this severely handicaps any chairperson, as the possibility of physical meeting is blocked by his/her government beforehand.) <i>Category : SUBSTANTIVE</i>

79	6.9.5 Resource implications for Codex members, the Secretariat and the host countries should also be considered.	USA Delete this as it is redundant of 6.9.1(iii) <i>Category : SUBSTANTIVE</i>
83	7.3 The <i>Procedural Manual</i> provides for co-chairpersons, rapporteurs along with the Codex Secretariat and the Committee itself. How these roles operate in the correspondence setting needs to be clarified. Where the roles vary from that in the physical setting justification needs to be provided.	USA Substantive Comment: With regards to the text "co-chairpersons, rapporteurs along ...", we note that there is no guidance in the Procedural Manual for the specific roles/responsibilities for the co-chairpersons and the rapporteurs. With regards to the co-chairperson, the Procedural Manual does, however, mention it in the context of co-hosting committee sessions. Ultimately, this may be best left to the judgment of the Committee Chair in consultation with the Codex Secretariat. Substantive Comment: With regards to the sentence "How these roles operate ...", it is not clear why there should be any difference for CWBC. Is there guidance or is it left to individual committee chairs in practice? This may be best left to the judgment of the Committee Chair in consultation with the Codex Secretariat. <i>Category : SUBSTANTIVE</i>
85	7.5 When, in the judgement of the Chairperson it becomes clear that no progress is possible by a CWBC, the committee Chairperson may propose one of the following alternative options to the CWBC (in the first instance) before referring to CCEXEC/CAC to: <u>i. Establish an EWG with a time frame working on obstacles that prevent reaching consensus or advancing the work.</u>	Egypt <i>Category : TECHNICAL</i>
85	7.5 When, in the judgement of the Chairperson it becomes clear that no progress is possible by a CWBC, the committee Chairperson may propose one of the following alternative options to the CWBC (in the first instance) before referring to CCEXEC/CAC to:	Norway Regarding the options i., ii. and iii, there seems to be a iv missing: The option to conduct a physical meeting like a pwg (not the same as reconvening the original committee), we therefore suggest that this is included as a fourth option. <i>Category : SUBSTANTIVE</i>
86	Switch from working by correspondence to a physical way of working for example by asking the Secretariat to convene a meeting of a Rule XI 1. (a) subsidiary body;	Netherlands See comment The Netherlands under 6.9.5. regarding the responsibilities for Committees' needs. If a chairing country is allowed to state it is incapable of holding a physical meeting for financial reasons, this severely handicaps any chairperson, as

		the possibility of physical meeting is blocked by his/her government beforehand. <i>Category : SUBSTANTIVE</i>
86	Switch from working by correspondence to <u>an alternative</u> , a physical way of working <u>working</u> , for example by <u>recommending referral to a committee that is meeting physically or asking</u> the Secretariat to convene a meeting of a Rule XI 1. (a) subsidiary body;	USA Added text <i>Category : SUBSTANTIVE</i>
89	7.6 Specific procedural guidance covering the above mentioned options may be useful.	USA Substantive Comment: The U.S. would like more detail on what types of additional guidance members believe might be useful and specific to CWBC. This may be best left to the judgment of the Committee Chair in consultation with the Codex Secretariat. <i>Category : SUBSTANTIVE</i>
90	7.7 Proposal on guidance for chairpersons of CWBC	USA Substantive Comment: The U.S. recommends that the guidance in this section include only topics which require guidance on considerations that are unique to CWBC and refer to the relevant sections of the Procedural Manual for guidance that applies to all committees. <i>Category : SUBSTANTIVE</i>
90	7.7 Proposal on guidance for chairpersons of CWBC	Norway We support procedural guidance for CWBCs, similar to what is already contained in the PM, and we are looking forward to further discussions on such guidance. <i>Category : SUBSTANTIVE</i>

90	<p>7.7 Proposal on guidance for chairpersons of CWBC</p>	<p>The Philippines On the proposed specific considerations as stated in 7.7.2, the Philippines has the following views:</p> <ul style="list-style-type: none"> i. We support criteria i & ii for there is enough guidance provided for the roles of the chairperson, secretariat and rapporteurs as found in Section III. Guidelines for Subsidiary Bodies of the Procedural Manual. iii. We support this criterion on the importance of inclusiveness and recognition of all participants. However, we would like to be enlightened on the content of this specific consideration iv. On the role of silence, we believe that this is an important aspect of working by correspondence. In most cases, members fail to submit country positions on specified timelines and rely heavily on physical meetings as a venue to air out their country positions. Thus, guidance on how silence or non-submission of country positions will be treated as support in a CWBC. v. On the role of a potential co-chairperson, we would like more discussions on this particular consideration. Under Section III. Guidelines for Subsidiary Bodies – Sessions, the host country may be invited as co-chair of the person. In the absence of a physical meeting, we would like to be enlightened on the parameters for the consideration of a co-chairperson and their role in facilitating the development of standard. vi. We support this criterion as long as it follows Rule XII Elaboration and Adoption of Standards. Rule XII also provided the circumstance when votation will only happen
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94	The role <u>role, scope and TOR</u> of the Codex Committee (active or adjourned <i>sine die</i>);	<p>Egypt</p> <p><i>Category : TECHNICAL</i></p>
94	The role of the Codex Committee (active or adjourned <i>sine die</i>);	<p>USA</p> <p>Substantive Comment: Unclear what this would be; isn't the role of the committee determined by its terms of reference and the work referred to it by the CAC?</p> <p><i>Category : SUBSTANTIVE</i></p>
98	The potential role of a co-chairperson;	<p>USA</p> <p>Substantive Comment: Why is this specific to committees working by correspondence? This may be best left to the judgment of the Committee Chair in consultation with the Codex Secretariat.</p> <p><i>Category : SUBSTANTIVE</i></p>
99	The role and place of voting in the correspondence setting as a measure of support or otherwise;	<p>Netherlands</p> <p>Voting in the correspondence setting is a silly idea, if a positive result can be achieved when only 10% + 1 Commission member, or only 13 members constitute a majority within the quorum. This is made progressively worse by the idea that just 'registering' already counts as 'participating'.</p> <p><i>Category : SUBSTANTIVE</i></p>

99	The role and place of voting in the correspondence setting as a measure of support or otherwise;	<p>Costa Rica</p> <p>The role, place and reporting of voting in the correspondence setting as a measure of support or otherwise;</p> <p>Justification. In the guidance for chairpersons, it is important to provide clear instructions on the manner in which the report on the voting process should be presented.</p> <p>Moreover, although it has already been included in Section 12.10.1 (Proposal regarding reporting), we suggest adding a new point to Section 7.7.2 on guidance for drafting reports.</p> <p>Justification: The Section proposes that the Commission consider the development of specific procedural guidance for chairpersons of CWBC and puts forward a number of considerations. It is essential to draft reports that clearly reflect the discussions. This is why we believe that this should be included in this Section as a direct proposal to the Commission. <i>Category : SUBSTANTIVE</i></p>
100	<u>The import role of since and other legitimate factors while commenting on health and safety matters.viii.</u> The potential role of a rapporteur generally but also specifically in relation to consensus-building; and	<p>Egypt</p> <p><i>Category : TECHNICAL</i></p>
100	The potential role of a rapporteur generally but also specifically in relation to consensus-building; and	<p>USA</p> <p>Substantive Comment: Why is this specific to committees working by correspondence? <i>Category : SUBSTANTIVE</i></p>
100	The potential role of a rapporteur generally but also specifically in relation to consensus-building; and	<p>Norway</p> <p>We think that there is a need to discuss the role of a rapporteur, the role of the codex secretariat and the importance of transparency and documented and a balanced report from the work in the CWBC <i>Category : SUBSTANTIVE</i></p>
106	COMMUNICATION AND INCLUSIVENESS - LANGUAGE AND TRANSLATIONS Each CWBC should work electronically through an electronic user group using the <u>Codex electronic forum.</u>	<p>Egypt</p> <p><i>Category : TECHNICAL</i></p>
106	COMMUNICATION AND INCLUSIVENESS - LANGUAGE AND TRANSLATIONS	<p>The Philippines</p> <p>The Philippines is of the view that the current procedural manual provides enough guidance on availability of documents</p>

		<p>for the session and its translation into the Codex official languages.</p> <p>We would rather like to be clarified on how the report of the 'session' of CWBC will be documented (i.e. real time, after the Webinar) and how will the 'session reports' will be adopted (i.e. 'sessions' are held through Webinar) in relation to the availability of translated draft report.</p> <p>The Philippines acknowledges the importance of this issue and its effect on the processing of all working documents in the working languages of Codex committees. The CWBC should use the international language of communication: English, French and Spanish. To cut translation cost- the Standards shall be translated by the affected country and sent back to the CWBC for final approval.</p>
107	<p>8.1 The <i>Procedural Manual</i>²² provides that the host country has the responsibility for operating costs such as processing of all working documents in the working languages of Codex committees. This includes providing interpretation services in those languages at physical meetings of the committee²³. CWBC should continue to have responsibility for such costs unless there is a rationale for why they should be different.</p>	<p>Senegal Position: Senegal supports this point concerning the host country's responsibility for the cost of interpretation services in these languages in the context of a CWBC but the rationale for this country's dispensation should be clearly stated. This rationale should be justified. Availability of CWBC working documents in the three Codex languages would allow for greater involvement from French-speaking countries by enabling them to better express their positions. Use of English as the only CWBC working language is an obstacle. Justification: The rationale for dispensation should be justified. For instance, interpretation services could be paid for by another organization [...]. <i>Category: TECHNICAL</i></p>
107	<p>8.1 The <i>Procedural Manual</i>²² provides that the host country has the responsibility for operating costs such as processing of all working documents in the working languages of Codex committees. This includes providing interpretation services in those languages at physical meetings of the committee²³. CWBC <u>host countries</u> should continue to have responsibility for such costs unless there is a rationale for why they should be different.</p>	<p>USA Added text <i>Category : SUBSTANTIVE</i></p>

110	8.2 CWBC have typically tended to work in only one of the Commission's languages. While this is an eminently pragmatic approach, it does have the potential to limit inclusiveness, which is one of the core values of the Commission. In light of <u>Considering this and continuing advances in technology, CWBC should work in multiple official languages.</u>	USA Added text. <i>Category : SUBSTANTIVE</i>
110	8.2 CWBC have typically tended to work in only one of the Commission's languages. While this is an eminently pragmatic approach, it does have the potential to limit inclusiveness, which is one of the core values of the Commission. In light of this and continuing advances in technology, CWBC should work in multiple official languages.	Norway Before concluding that working in only one language is limiting the participation, we would suggest to look at previous information on this. We would also like to note that comments to physical meetings are not translated, but collected in original language. <i>Category : SUBSTANTIVE</i>
111	8.3 It may be that, as in the case of physical committees, at times the financial and technical constraints may limit the extent to which the provision of translations are <u>is</u> practical. Such cases call for a flexible approach (as occurs in the physical setting) with options available such as the CWBC translating working documents and reports only, and not all comments. This is to ensure such costs do not provide a barrier to the hosting of CWBC. <u>The Codex Forum now has a mechanism for machine translation of comments which may in part resolve this issue.</u>	USA Added text <i>Category : SUBSTANTIVE</i>
113	8.4.1 For the sake of inclusiveness and maximum participation CWBC, should operate, in the official working languages of the Commission or relevant Committee (with the costs met by the host). All comments should be submitted within the specified time to allow time for them to be translated.	Senegal Position: Senegal supports this point. <i>Category: TECHNICAL</i>
114	8.4.2 There may at times be justification for flexibility where financial and technical constraints may limit the extent to which translating of all documentation could realistically be achieved. For example the host country may choose to provide translations of working documents and reports only and not all comments, where financial or technical constraints could otherwise provide a barrier to the hosting of CWBC (just as physical meetings may not always operate in all the official languages). Commenters themselves may also choose to provide translations of their comments.	Netherlands Since at least 2008 the Codex Alimentarius Commission has stopped translation of comments. The Codex Alimentarius Commission gives all the comments to us in original language. CCNFSDU no longer translates comments. <i>Category : SUBSTANTIVE</i>
114	8.4.2 There may at times be justification for flexibility where financial and technical constraints may limit the extent to which translating of all documentation could realistically be achieved. For example the host country may choose to provide translations of working documents and reports only and not all comments, where financial or technical constraints could otherwise provide a barrier to the hosting of CWBC (just as physical meetings may not always operate in all the official <u>official-working</u> languages). Commenters themselves may also choose to provide translations of their comments.	USA edited text <i>Category : SUBSTANTIVE</i>

114	8.4.2 There may at times be justification for flexibility where financial and technical constraints may limit the extent to which translating of all documentation could realistically be achieved. For example the host country may choose to provide translations of working documents and reports only and not all comments, where financial or technical constraints could otherwise provide a barrier to the hosting of CWBC (just as physical meetings may not always operate in all the official languages). Commenters themselves may also choose to provide translations of their comments.	<p>Norway We support the proposal to translate working documents and reports only as this seems to be the most efficient way of working taking time into account. We would also support encouraging members to translate their own comments. <i>Category : SUBSTANTIVE</i></p>
115	MEMBERSHIP AND CREDENTIALS OF DELEGATIONS (IDENTITY AND AUTHORITY)	<p>The Philippines The Philippines supports this agenda but aside from scrutiny and verifications of the Codex Secretariat, they should also provide written procedures for confirming the credentials of those who wish to participate in the CWBC sessions.</p>
116	9.1 Some concern has been raised about how membership and representation is determined when committees are working by correspondence.	<p>Netherlands Regarding guests. Codex meetings are public meetings. However, there are also security issues. Regarding guests to Codex meetings (other than delegates) the Netherlands (as host of CCF) for the past three years has adopted the policy that only the Codex Contact Point of a country or organization can register people. The Netherlands has no way to judge people from other countries that want to attend. When co-hosting, our co-hosts can add their guests. Together with our co-host we remove guests they/we do not want to appear on the list of participants. Up to now this has led to the refusal of a few guests from countries other than host or co-host. For others this proved a solution. In general this has worked well. <i>Category : SUBSTANTIVE</i></p>
122	It is proposed that the Commission clarify that the rules and procedures for accreditation and official recognition of the credentials of representatives of Member countries and observer organizations to Codex CWBC are the same as those already in place for physical meetings of committees and require designation of a single representative/head of delegation for participating members and observer organizations to be designated by the relevant CCP or observer organization. For clarity, and for consistency with physical Committees, the Codex Secretariat should provide written procedures for confirming the credentials of those who wish to participate in CWBC.	<p>Norway We support the need for written procedures provided by the Codex secretariat as proposed. <i>Category : SUBSTANTIVE</i></p>
123	DETERMINING A QUORUM (BEFORE A COMMITTEE CAN MAKE A DECISION)	<p>Netherlands 10. Quorum For a CWBC determination of a quorum should include</p>

		<p>'registration'. This is not in conformity with the current registration practice for Codex Committees. Just registering and not turning up, leads to the removal from the list of participants in a physical meeting. Uncollected badges on Tuesdays are proof of non-participation. The designated recipients of these badges are removed from the list of participants. This is the reason why lists of participants have to be updated manually during a meeting. Just registering does not mean the documents were seen. David Massey/ The system can see who actually opened the documents. Opening of documents already would be a better measurement method.</p> <p><i>Category : SUBSTANTIVE</i></p>
129	10.5 Proposal regarding quorum	<p>Kenya</p> <p>Kenya seeks clarification on the issue of numbers that determines quorum as proposed in this clause. The values (not less than 20% of total commission membership nor less than 25 members, or for a regional meeting one third of the members belonging to the region or group of countries concerned), seems to be conflicting.</p> <p><i>Category : SUBSTANTIVE</i></p>
129	10.5 Proposal regarding quorum	<p>The Philippines</p> <p>The Philippines acknowledges the importance of this issue and its effects on the assessment and determination of consensus of a quorum. The Philippines supports the registration of the Commission Members for the committee that shall constitute a quorum, provided that such majority is not less than 20 percent of the total Commission membership, nor less than 25 members.</p> <p>On the matter of determining whether consensus has been reached and in formulating the question, we are of the view that the Committee may also consider determining proxy indicators to gauge whether consensus has been achieved. Questions answerable by yes or no constitute voting and voting is considered as last option in advancing a Codex proposed text. We acknowledge that consensus building will be more challenging for CWBC, thus, we would like to propose that the</p>

		three options as presented in 7.5 be included in the decision options for Chairpersons. <i>Category : SUBSTANTIVE</i>
130	10.5.1 For a CWBC, a majority of Commission Members <u>registering</u> for the committee shall constitute a quorum, provided that such a majority is not less than 20 percent of the total Commission membership, nor less than 25 members (or for a regional meeting, one third of the Members belonging to the region or group of countries concerned).	Norway Not sure that it is correct to say that "registering" will constitute a quorum, we think this would benefit some more discussions, as for physical meetings you would need to actually "be there" in order to be" counted in". <i>Category : SUBSTANTIVE</i>
130	10.5.1 For a CWBC, a majority of Commission Members <u>registering</u> for the committee shall constitute a quorum, provided that such a majority is not less than 20 percent of the total Commission membership, nor less than 25 members (or for a regional meeting, one third of the Members belonging to the region or group of countries concerned).	Costa Rica Following what is set out in the Procedural Manual as regards quorum, we consider that the wording of the proposal put forward in Section 10.5.1 could be confusing. As a result, we propose the following wording: 10.5.1 In order for a CWBC to take decisions or consider that quorum has been constituted, the minimum numbers of opinions or votes received shall not be less than 20 percent of the total members registered for this committee (or for a regional meeting, one third of the Members belonging to the region or group of countries concerned). Justification: If it were to be applied, the wording including the phrase "nor less than 25 members" could create confusion. The foregoing results from our experience as host country for the "CWBC on developing a standard for quinoa", for which only 18 countries registered. We could ask, what would happen in such a situation? Does the committee have to be suspended? It should be stressed that a country's goal when taking part in discussions on a topic, in addition to moving discussions forward (as has been reflected in the surveys), is often dictated by the potential impact of the decisions taken on that country, by the complexity of the topic and the existence of data amongst other considerations. Consequently, there are many

		factors that could lead to a group with many participants or, conversely, with very few registered members, being set up. <i>Category : SUBSTANTIVE</i>
132	ADVANCEMENT OF STANDARDS AND RELATED TEXTS INCLUDING DETERMINING AND FACILITATING CONSENSUS, REPORTING CONCERNS (OR RESERVATIONS) AND VOTING	Japan If voting was introduced in CWBC, it would cause problem on the credibility of Codex, such as, the voting may be made by somebody other than the head of delegation (e.g. non-related person to the delegation); technical problems may prevent some countries from voting; or counting may be made in incorrect procedure. The procedure of voting in CWBC could not be as reliable as the procedure of voting that is conducted in physical meetings, which is proceeded very carefully in accordance with the Procedural Manual and legal frameworks of FAO and WHO to prevent improper practice. <i>Category : SUBSTANTIVE</i>
133	11.1 The <i>Procedural Manual</i> ^{P7} directs Chairpersons to consider a number of measures to facilitate consensus building in the elaboration of standards, including ensuring that matters are not progressed through the step process until all relevant concerns are taken into account and adequate compromises worked out.	Netherlands 11. Advancement of standards 11.1. The Procedural manual directs Chairpersons to consider a number of measures to facilitate consensus building in elaborate standards... Reference should also be made to the Measures to facilitate consensus (Adopted 2003). The building after consensus should be removed here. In this section “arrive at consensus”, “secured by consensus” “facilitate consensus” achievement of consensus”. All about consensus, not building consensus. Reference is made here to measures to facilitate consensus. Referring here to the quotes “consensus building” in the Procedural Manual excludes therefore reference to all the text before the section where “consensus building” is mentioned for the first time. Yes, a core value of Codex is consensus building. However, all these activities are aimed in the end at the end result: consensus. <i>Category : SUBSTANTIVE</i>
138	11.5 To reduce uncertainty caused by silence in the correspondence setting, it is proposed that when Members are asked to express their position on the progression of a specific proposal, they need to be made aware that silence (i.e. lack of an affirmative or negative response to the question) is considered as agreement (in line with what	Netherlands 11.5 Silence ... is considered as agreement. This is line with what occurs in physical meetings IF indeed documents are read or seen. Just registering and not turning up, leads to the

	occurs in physical meetings and would not block proceeding through the step procedure).	removal from the list of participants in a physical meeting on Tuesday. (see under 10, Quorum) <i>Category : SUBSTANTIVE</i>
138	11.5 To reduce uncertainty caused by silence in the correspondence setting, it is proposed that when Members are asked to express their position on the progression of a specific proposal, they need to be made aware that silence (i.e. lack of an affirmative or negative response to the question) is considered as agreement (in line with what occurs in physical meetings and would not block proceeding through the step procedure).	The Philippines The Philippines supports this agenda, but to determine majority of votes of the consensus drafts shall be sent to members for evaluation/assessment electronically with a maximum of one month in order to give members enough time to thoroughly read the text of the draft. Final voting should be done by webinar, which may be equivalent to physical appearance and to reduce the uncertainty caused by silence in the correspondence setting, commission members with valid registration shall be constituted as part of the quorum therefore considering their silence or lack of affirmation as an agreement to the proceeding <i>Category : SUBSTANTIVE</i>
139	11.6 In determining whether consensus has been reached, it may be useful to ask a specific question of the committee such as: <i>'Do you support advancing the draft standard to Step X?' or 'Do you oppose advancing the draft standard to Step X?' or 'Do you "not oppose" advancing the draft standard to Sep X?' as deemed appropriate by the chairperson.</i> This would enable the positions of members to be accurately recorded. Where there is broad support for advancing the draft standard it should be clearly reflected in the report.	USA Substantive comment: Text here should be consistent with the text in Para. 11.4 above. <i>Category : SUBSTANTIVE</i>
141	11.8 While the <i>Procedural Manual</i> makes it clear that every effort should be made for Committees to reach agreement by consensus ²⁸ , it also provides for voting ²⁹ .	Netherlands 11.8. The PM makes clear that every effort should be made for Committees to reach agreement by consensus, it also provides for voting. Voting should not take place under our current rules of what constitutes a majority: only 50% plus one vote. This is just too divisive, not inclusive and not consensus building. Codex is the only international organization that works with such a small majority to take decisions. If we would define 2/3 of the votes as a majority, this would already be a lot better in terms of consensus building. <i>Category : SUBSTANTIVE</i>
144	11.9 When-If/When the Chairperson of the CWBC decides to call a vote, determination of majority of votes needs more transparency in the correspondence setting. In contrast to the physical committee where the total number and majority of votes cast can be determined by simply counting, for CWBC the number of total votes,	USA Substantive Comment: This paragraph requires more discussion. It is unclear how or why the situation is different in CWBC. Presumably, members could call for a vote, silence would not be recorded as voting for or against a proposal, etc.,

	majority of vote cast, how to deal with silence, and a timeframe of voting should be elaborated on in the criteria.	as in physical meetings, As a practical matter, voting is rare in Codex, and we would expect it to be equally or more rare in CWBC. Chairs are likely to recommend alternative means of dealing with highly controversial issues that emerge in CWBC rather than pursue voting. It may be best to remain silent on the question of voting and not presume Chairs are likely to call for votes. <i>Category : SUBSTANTIVE</i>
146	11.10.1 In determining whether consensus has been reached when progressing through the step process, committee members working by correspondence should be asked specifically ‘Do you support advancing the draft standard to Step X?’ or ‘Do you oppose advancing the draft standard to Step X?’ or ‘Do you “not oppose” advancing the draft standard to Step X?’ as deemed appropriate by the chairperson.	USA Substantive Comment: This is consistent with standard procedures in a physical setting and should be provided for in the CWBC context. <i>Category : SUBSTANTIVE</i>
146	11.10.1 In determining whether consensus has been reached when progressing through the step process, committee members working by correspondence should be asked specifically “Do you support advancing the draft standard to Step X?” or “Do you oppose advancing the draft standard to Step X?” as deemed appropriate by the chairperson.	Costa Rica Costa Rica supports inclusion of the question “Do you support advancing the draft standard to Step X?” but suggests removing the question “Do you oppose advancing the draft standard to Step X?”. Moreover, we also suggest adding a Yes/No choice and the words “If your answer is No, kindly justify it”. Justification: For greater clarity and to make it easier to draft the report. <i>Category: SUBSTANTIVE</i>
147	11.10.2 CWBCs may use a similar approach (or suitable variation) when determining consensus on more detailed points of discussion, such as text changes. It should also be clarified that silence (e.g., lack of an affirmative or negative response to this question) will be interpreted as not opposing advancement in the same way that silence is accounted for in physical meetings.	Costa Rica Costa Rica considers that it would be pertinent to add a paragraph after Section 11.10.2 to clearly state: When is consensus reached? How is a majority established (for example, simple or qualified majority)? What happens if a particular country abstains? What happens if the Chairperson has double voting rights?, as well as other relevant aspects for reaching a consensus. The report should reflect the process implemented when the majority of votes do not enable consensus to be achieved, as an alternative to application of the proposal put forward in Section 7.5. <i>Category: SUBSTANTIVE</i>

149	11.10.4 Finally, any guidance should clarify the difference between the following terms: Not oppose; Making a reservation; Opposition to a decision; and Voting in the correspondence setting.	USA Substantive comment: It is not clear that CWBC should differ from committees meeting physically. <i>Category : SUBSTANTIVE</i>
150	REPORTING TO THE COMMISSION	The Philippines The Philippines supports that the Codex Procedural Manual provides sufficient guidance on the drafting and finalization of report for physical meetings. As pointed out in 12.7 of CX/GP 20/32/4 there is a prescribed timeline for the circulation of adopted report (i.e. 1 month after the end of the session). However, there is a gap in the procedure for the circulation of draft report and commenting period for CWBC. Thus, this needs clarification. <i>Category : SUBSTANTIVE</i>
157	12.5 The provision of a report template could be warranted (possibly optional). The report could include a format providing members comments and responses (possibly included as an Annex).	USA Substantive comment: Delete the entire first statement: "The provision of a report template could be warranted (possibly optional)." Reports should be prepared by the Secretariat in consultation with the chair and follow the same model as reports of physical meetings. See pp. 105-106 of the 27th Ed. of the Procedural Manual – i.e., the report is the Codex Secretariat's role. <i>Category : SUBSTANTIVE</i>
159	12.7 Currently the <i>Procedural Manual</i> provides that the Joint FAO/WHO Secretariat should ensure that not later than one month after the end of the session, copies of the final report, as adopted in the languages of the Committee, are sent to all members and observers of the Commission (with CLs attached).	Netherlands 12. Reporting. It seems reasonable to insert an extra comments round, as the visibility of which comments are taken up into the final report is absent in a CWBC. The experiences of CCLAC 2019, where the adoption took place through the OCS, with real-time comments visible may show the way here (as described in CX/EXEC 20/78/9). <i>Category : SUBSTANTIVE</i>
160	12.8 There is already a process that gives members an opportunity to comment before adoption of a report (and this point could be made clear for CWBC).	USA Substantive comment: With regards to the word "process" in this statement, what is not clear is a process for commenting on the draft report itself, consistent with the practical need for timely distribution and Secretariat resources. <i>Category : SUBSTANTIVE</i>

164	12.10.1 CWBC should make every effort to ensure that the report of the committee accurately reflects discussions discussions, conclusions and decisions reached during the identified period of activity of the CWBC. The conventions and practices that apply to the drafting of reports of committees holding physical meetings should also be observed, to the extent relevant, by CWBC (possibly with the aid of a report template).	Egypt <i>Category : TECHNICAL</i>
164	12.10.1 CWBC should make every effort to ensure that the report of the committee accurately reflects discussions and decisions reached during the identified period of activity of the CWBC. The conventions and practices that apply to the drafting of reports of committees holding physical meetings should also be observed, to the extent relevant, by CWBC (possibly with the aid of a report template).	USA Substantive comment: With regards to the following text at the end of this paragraph "(possibly with the aid of a report template)", the Secretariat already has a basic standard format for committee reports. Need to discuss rationale for a different format or template. <i>Category : SUBSTANTIVE</i>
164	12.10.1 CWBC should make every effort to ensure that the report of the committee accurately reflects discussions and decisions reached during the identified period of activity of the CWBC. The conventions and practices that apply to the drafting of reports of committees holding physical meetings should also be observed, to the extent relevant, by CWBC (possibly with the aid of a report template).	Norway Same comment as for 7.7.2: We think that there might be a need to describe the role of the chair, a rapporteur and the codex secretariat and the importance of transparency and documented discussions and a balanced report from the work in the CWBC <i>Category : SUBSTANTIVE</i>
165	12.10.2 The conventions and practices include objectivity and clarity of conclusions and recommendations, as well as recording of reservations or concerns when specifically requested by members. Depending on the extent of the Chairperson's role in drafting the report, a timeframe for finalizing the <u>draft and the final</u> report may be required.	Egypt <i>Category : TECHNICAL</i>
165	12.10.2 The conventions and practices include objectivity and clarity of conclusions and recommendations, as well as recording of reservations or concerns when specifically requested by members. Depending on the extent of the Chairperson's role in drafting the report, a timeframe for finalizing the report may be required.	USA Substantive Comment: With regards to the word "timeframe" at the end of this paragraph, page 106 of the 27th Ed. of the Procedural Manual already provides for a timeframe – i.e., 1 month after conclusion of the session. <i>Category : SUBSTANTIVE</i>
174	Role of the Codex Committee (active or adjourned sine die);	USA Delete this bullet. <i>Category : SUBSTANTIVE</i>
183	Discuss the next steps to advancing this issue.	Norway In our view, procedural guidance on the suggested areas would fit well as an additional chapter in Section III in the PM. A separate chapter with "Guidelines for Committees Working by Correspondence", would, like the other chapters in this Section, deal with relevant issues for this specific situation: "Criteria for

		<p>work appropriate for assignment”, “Role of Chairpersons”, “Membership and credentials”, determining of quorum”, “Advancement of stds” and “Reporting” (list as suggested in the draft document). We consider this a practical way forward instead of amending current chapters in Section III. <i>Category : SUBSTANTIVE</i></p>
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