



**Food and Agriculture  
Organization of  
the United Nations**



**World Health  
Organization**

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**Agenda Item 2(a)**

**CX/AFRICA 11/19/2-Add.1**

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

**19<sup>th</sup> Session  
Accra, Ghana, 1-4 February 2011**

**MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX  
COMMITTEES**

**Replies to CL 2010/43-AFRICA (private standards, processed cheese and Codex Strategic Plan 2013-2018)  
received from Mali and IDF**

## **1. PROCESSED CHEESE**

### **MALI**

Mali has no particular comments to make on this matter.

### **INTERNATIONAL DAIRY FEDERATION (IDF)**

The International Dairy Federation (IDF) would like to comment with regard to the possible further work on Codex standard(s) for processed cheese as follows:

1. The term “processed cheese” covers a diverse range of products, and the term is used in various ways to describe the products. It is therefore difficult to identify products in trade and to obtain reliable trade statistics, but it is safe to say there are large volumes of processed cheese products produced and traded internationally as is underlined also in para. 89 of ALINORM 10/33/REP. The development of regional standards which may vary from one region to another will inevitably create obstacles to existing trade.
2. In view of the significance of this type of product, the Codex Committee on Milk and Milk Products (CCMMP) has deployed intensive efforts and resources to develop an international standard on processed cheese for more than a decade but could not reach agreement in particular on the compositional aspects due to the wide variety of products currently traded. Indeed, IDF has been closely involved in all these efforts and is thus very familiar with the issues that have inhibited progress. IDF believes that further work by CCMMP or work of regional FAO/WHO Coordinating Committees on this subject is unlikely to be conclusive. Indeed, IDF supports the view of CCMMP that it is impossible to further progress the work on a proposed draft Standard for Processed Cheese.
3. According to IDF knowledge there is no evidence of any significant problem in the international trade in processed cheese products.

## **2. PRIVATE STANDARDS**

### **MALI**

**Question 1 – Have food producers/processors in your country experienced any problems in meeting private standards?**

Fruits and vegetables are Mali’s main agricultural exports, with more than 50% sent to the European Union (EU).

Horticultural products for export are grown by small producers who constitute a driving force for reducing poverty and developing rural economies.

Malian fruit and vegetable exporters are governed by the new official controls of the EU (specified in the regulations), but they also have to meet the requisites of the Private Voluntary Standards (PVSs) of the major importers and retailers which are more complex and stringent than the regulatory standards. While these standards are optional because not prescribed by law, they must increasingly be observed if producers wish to export their products, converting them into *de facto* mandatory standards.

The PVSs most commonly required for export fruits and vegetables are GlobalGAP and Organic and Eco-Labeling. These apply to all stages from primary production, through processing, to distribution. Ever greater consumer demands also require retailers to adopt standards for labour, environment and corporate responsibilities. A recent trend has been the labelling of air freighted products to enable European consumers to reduce their carbon footprint.

There is an increasing number and complexity of requirements under the private standards. Concern about food safety is now extending to include concern about environmental and social matters. Vertical integration will continue to pressurize marginal actors and the participation of small producers will be become increasingly threatened.

The greater stringency and complexity of private standards is all the more worrying as it could undermine the efforts by ACP countries to broaden their markets by capitalizing on lower tariffs and higher import quotas.

**Question 2 – What are the financial implications of meeting private standards, especially implications for SMEs?**

Certification and the renewal of PVS certificates are very expensive. This is therefore very difficult for Mali's small producers who do not have the necessary capital and who operate in a very difficult environment (lack of infrastructure and support service resources).

Mali's small producers can only meet the GlobalGAP standards if they receive an external subsidy (State or development partners). They cannot afford the initial investment and, once they have obtained certification, are unable to meet high recurring costs, as there is no GlobalGAP premium. This could have serious implications for poverty. Commercial horticulture is one of the few areas in which European consumers could have a direct tangible impact on rural poverty alleviation in the developing countries. But that impact is compromised by the clear reduction in number of small farmers supplying high-added value European retailers.

Horticultural exports are a significant asset: they inject cash liquidity into rural areas, provide small producers with significant non-financial benefits (technology transfer and acquisition of farm management expertise) and increase supply, aspects that are beyond the reach of small producers and small export companies.

We believe that the integration of small producers into these lucrative sectors could be facilitated by promoting collaboration on market awareness involving the private sector, donors and producers.

**Question 3 – What measures have been taken to overcome/ease the problems in implementing private standards?**

In order to help Mali's small horticultural producers and exporters to overcome or mitigate the problems related to the application of PVSs, the Government of Mali and its development partners (PIP COLEACP, WTO, UEMOA Quality Programme, IICEM) have initiated the following actions:

- Support for the organization of Mali's commercial horticultural producers;
- Support for the training of actors on related benchmarks;
- Assistance to producers and exporters in meeting the benchmarks;
- Support for the upgrading of infrastructure and equipment;
- Support for capacity building of laboratories and official control services;
- Assistance to producers and exporters in preparing the technical paperwork for certification;
- Support in meeting the cost of certification and certificate renewal.

#### **Question 4 – What should the CAC/FAO/WHO do in the context of private standards?**

Mali agrees with the conclusions of the FAO/WHO study on private standards whereby PVSs tend to be more stringent than corresponding Codex standards, but without scientific justification, while collective food safety standards are largely consistent with the Codex. A general exception relates to traceability requirements. Private voluntary standards are more prescriptive than the Codex standards in stating how food hygiene criteria should be met. Since the standards are usually drawn up with limited opportunity for developing country input, their requirements are often inappropriate to developing countries and are difficult or indeed impossible to apply by small-scale food companies in those countries. The cost of certification disproportionately penalizes small producers and the existence of multiple criteria poses a major problem, particularly when the differences between standards are minimal.

According to the WTO Agreement on SPS measures, the purpose of related standards is to protect consumer, animal and plant health.

Malian companies face PVSs based on benchmarks established by European distributors.

The following recommendations need to be implemented to achieve the objectives of the Codex Alimentarius Commission, notably to protect consumer health, to ensure fair trade in food commodities and to promote the coordination of all food standard-related work undertaken by governmental and non-governmental international organizations:

For organizations establishing PVSs:

- Ensure transparency in PVS formulation and application;
- Ensure mutual recognition of PVSs;
- Participate in Codex Alimentarius sessions as observers.
- For the CAC (FAO/WHO)
  - Improve the time frame for the setting of Codex standards;
  - Encourage the organizations establishing PVSs to participate in Codex sessions;
  - Establish closer links with organizations establishing private standards.

### **PREPARATION OF THE REVISED STRATEGIC PLAN FOR 2013-2018**

#### **MALI**

##### **a) Are the current five goals still relevant? What changes would you propose (if any)?**

The current proposed five objectives are relevant. Mali supports their adoption by the Codex Commission.

##### **b) The 2003-2007 Framework did not include measurable indicators, as does the current Strategic Plan. Should the next Strategic Plan include measurable indicators? Is the current “table” format useful or would you suggest changes? For example, is it useful to track “ongoing” activities?**

Mali supports:

- consideration of the measurable indicators in the current Strategic Plan;
- the current presentation in ‘table’ form;
- the possibility of tracking ongoing activities.

##### **c) What are the most significant challenges facing Codex? What goals/activities should be included in the next Plan to ensure that these challenges receive the necessary attention?**

#### **1. Promoting coherent regulatory frameworks**

Difficulties currently facing the Codex:

- Overly long time frame for setting Codex standards;
- Timid application of Codex standards in developing countries.

**2. Facilitate the broadest and most coherent possible application of scientific principles and risk analysis**

- Proliferation of Private Voluntary Standards;
- Insufficient support to developing countries in ensuring the broadest and most coherent application of scientific principles and risk analysis.

**3. Build work management capacity**

- Difficulties in covering the organization of field trips of delegates from other CCAFRICA countries.

**5. Encourage maximum and effective participation of members**

- Insufficient cooperation between Codex member countries;
- Inadequate availability of French versions of Committee working documents and reports of Codex working groups and panels of experts;
- Difficulties in covering the participation of delegates to Codex sessions.

**d) Given the fact that developing country participation in the work of Codex is presently a major issue, what goals/activities should be included in the next Plan to ensure that it receives the necessary attention in 2013-2018?**

The new Strategic Plan should consider the following actions to improve the participation of developing countries in Codex activities:

- Stronger cooperation among Codex countries (between developing countries and between developed and developing countries);
- Support for the organization of training sessions on the Codex to raise country participation in Codex activities;
- Support to help cover the participation of developing country delegates at Codex sessions;
- Support for the collection of data for risk assessment by FAO/WHO scientific panels.

**e) Do current Codex structures and procedures adequately meet present needs of members (i.e., various “step procedure” options, critical review by CCEXEC, etc.)? What changes might be considered?**

The current Codex structures and procedures meet the present needs of Mali.