

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 5

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

EXECUTIVE COMMITTEE OF THE CODEX ALIMENTARIUS COMMISSION

Fiftieth Session FAO Headquarters, Rome, 26-28 June 2002

PREPARATION OF THE MEDIUM-TERM PLAN 2003-2007

INTRODUCTION

1. In response to the request by the 23rd Session of the Codex Alimentarius Commission to begin early work on the development of a Medium-Term Plan 2003-2007, the Executive Committee, between its 47th and 48th Sessions, developed a structured model consisting of a strategic vision statement; a strategic framework described by objectives; and a detailed medium-term plan described by specific activities.

2. The Commission amended the draft Strategic Framework, including the Strategic Vision Statement and adopted it so as to sets out the strategic priorities for the Commission and provide the basis for the elaboration of the Medium Term Plan for the period 2003-2007. It also agreed that the draft Medium-Term Plan should be revised by the Secretariat in the light of the Strategic Framework, the discussion at its 24th Session and the written comments received, and that it should incorporate the elements of the Chairperson's Action Plan agreed to by the Commission. It agreed that the activities envisaged in the MTP should include cost estimates to determine whether the objectives could be achieved within available resources. The revised draft Medium-Term Plan would then be circulated for the input of Codex Coordinating Committees, other Codex Committees, Member governments and international organizations for further consideration and finalization at the 25th Session of the Commission.¹

3. Codex Circular Letter CL 2001/26-EXEC was issued in August 2001 requesting comments on the revised draft Medium-Term Plan. Comments were received from Brazil; Canada; Côte d'Ivoire; Cuba; United States of America; European Community; and Consumers International. This document contains the general and specific comments received from Member Governments and interested international organizations.

¹ ALINORM 01/41, paras. 68-69.

4. Several new activities have been added. The United States of America and the European Community have proposed new activities and these are identified with the Activity ID numbers 35 to 41. The Secretariat has added three "general" activities (42 to 44) to cover the general secretariat support given to the Commission and its subsidiary bodies.

5. In view of questions raised by some commenters on the allocation of staff resources and estimates of costs under each activity, these data have been reviewed and amended on the following basis:

- Staff time refers to the estimated professional staff time of the Codex Secretariat based in Rome;
- Estimated costs are standard non-staff costs attributed to the Codex budget only.

6. It should be noted that the total staff time and costs (on a biennial basis) estimated from the activities proposed exceeds the current resources of the Secretariat and therefore the activities proposed would need to be phased over the period of the Medium-Term Plan so that some activities would be undertaken in the first years of the plan and other taken in the later years; the allocation of priorities to the proposed activities would assist in the scheduling of the Medium-Term Plan. As was noted by some commenters, some of the proposed activities are duplicative or could readily be combined with other activities.

Action Required

7. The Executive Committee is invited to **consider** the Draft Medium-Term Plan in the light of these comments and prepare a revised draft that would then be circulated as indicated in paragraph 2 above.

COMMENTS RECEIVED

General Comments

Brazil

8. Brazil supports the elaboration of this Working Plan and considers it very positive the initiative of planning activities including fundamental aspects such as the appointed resources – both human and financial – to each activity.

9. Considering such issues and bearing in mind the dimension of some activities compared to others, Brazil understands that, for instance, the activity classified ID 10, was granted resources of the order of US\$ 10.000,00 – which is already not much and is very few when compared to other activities that do not have the same dimension, like activity ID 4 – Revision of the Terms of Reference of the General Matters Committees.

10. Activities such as ID 10, which involve technical assistance, and other activities mentioned in the Program but that would fall out of the attributions of the Commission should be directed to FAO and WHO, and be adequately planned, since they have major importance to member countries.

11. Another important aspect is to know the methodology used to quantify the amount of resources and the detailing of what would be included (human resources, travels, training, etc). It would be useful to have that included in the program, in order to allow member countries to express their opinion more objectively.

12. Brazil also suggests a harmonization in the planning of activities that are not considered quantifiable because they would involve training. Some of such activities were given cost estimates, others have not (e.g. 10 and 26). In such cases, it should remain clear to what specific expense the resources are expected and what is their status, in the case they are of FAO or WHO responsibility.

Canada

13. It is Canada's view that the structure of the Medium-Term Plan 2003 - 2007 is an improvement over previous plans. The practice of identifying activities, linking those activities to specific strategies in the Strategic Framework and setting time limits for their completion will enhance the efficiency of the Codex process.

14. Canada would like to acknowledge the excellent work done by the Secretariat in the short time since the 24th Session of the Codex Alimentarius Commission to provide estimates of resource requirements for each of

the activities identified in the Medium Term Plan 2003 - 2007. We feel that this was a necessary endeavour to assist in providing a basis for a full assessment of the Plan.

15. We note that the Plan is ambitious and will require more Secretariat resources than are currently available. Therefore, Canada is of the opinion that the identification of additional activities needs to be accompanied by a process for prioritizing these activities. Priority should be given to those activities which improve the protection of public health, address the priorities identified in the Strategic Framework and/or enhance the implementation of risk analysis in Codex.

16. Canada would also point out that FAO/WHO are in the process of conducting a review of the Codex Programme. The outcome of this review may also impact on the Medium-Term Plan, and such outcomes will need to be considered before the Plan can be finalized.

Côte d'Ivoire

17. The government of Côte d'Ivoire approves in its totality the Draft Medium-Term plan 2003-2007 as it is presented in the Annex to Circular Letter CL 2001/26-EXEC of August 2001.

Cuba

18. We consider that the Medium Term Plan covers the most important activities that the Commission will have to carry out in the coming years. We agree with them.

Consumers International

19. Consumers International (CI) is pleased to submit comments on items of major significance for our members world-wide in response to this circular letter. CI's members in all regions have been consulted on the Medium-Term Plan (MTP). This paper reflects the consensus position.

20. We acknowledge the progress made at the 24th Session of the Codex Alimentarius Commission in July 2001 and subsequent revisions to this document. And note also the comments of the Codex Executive at its 49th Session, Sept. 2001.

21. CI is currently developing a new food and nutrition programme and will be expanding its work on food safety. The programme will focus on campaigning, to raise consumer awareness of food issues, and on institution building to further develop the capacity of consumer organisations to successfully participate in decision-making bodies such as Codex Alimentarius. We hope to continue working closely with Codex Alimentarius.

22. CI particularly welcomes the announcement of the comprehensive Review of the Joint FAO/WHO Food Standards Programme (Codex Alimentarius). For some time CI and its members have been concerned about the challenges facing Codex, especially its ever increasing workload and the consequent demands this places on both Member countries and lesser funded non-governmental organisations, at the international and national level, such as CI and its members. Indeed the sustainability not only of the programme but also NGO's ability to effectively participate in its activities and decision-making is a real and pressing concern. We fully support this timely review and look forward to being actively involved in the process.

23. We note the intention that the final outcome of the review be presented to the next meeting of the Commission in 2003, which we fully support. However, we are perplexed about how recommendations made within the review will impact upon the MTP and its priorities. We wish to stress that this matter be given serious attention - neither the review nor the proposals of the MTP should be 'put on hold' while deliberations ensue. It is vital that the important work of Codex continues in the most expedient way possible.

24. In the light of the above CI wishes the following specific comments be placed on the record and further considered in the impending amendment of the MTP. CI acknowledges that this MTP is groundbreaking for Codex, it is different from previous plans, providing much more information. We welcome its development and further progress and offer these comments towards that process.

25. Regarding the structure and presentation of the detail of the proposed activities, CI has two overall concerns regarding quantification of costs and the responsibilities for actions.

a) *Costing*

26. We understand that different programmes need different allocation of resources depending on their relevance. For instance, ID4 – Review of the Terms of Reference of the Committees on General Issues has more resources allocated than other projects. We also understand that activities that require technical assistance, but fall outside the specifications of the Commission, should be submitted to other entities that sponsor Codex (FAO or WHO) and planned adequately according to the relevance they have for member countries. However, while CI appreciates the efforts to provide the detail of estimated costs, the methodology for the quantification of those costs, (the resources and details of HR, travel, capacity building, etc.) need to be included. It is important that this methodology is included in the programme. As presented, only a relative comparison of costs can be made, one programme area against another, further details of the inputs would make the process more transparent and enable CI's members to present their views on costs in a more objective way.

b) *Responsibilities for actions*

27. In the request for inputs and comments (page 2 of the CL) when proposing new activities the following information is requested: ... Committee, Task Force or other body responsible for delivering the work. However, we note that this detail is not included in the activities listed in the MTP. This detail is essential to be able to assess the responsibilities and priorities within the framework of Codex and the MTP. For example: on ID 4, to review the terms of reference of 'General Subject' Committees to clarify mandates and responsibilities and achieve efficient distribution of work, who would do this: CCGP or would each Committee do it itself? Would CCEXEC or Secretariat propose something? HOW the activities will be accomplished is important to know for a number of reasons, including transparency. Once the MTP is agreed it would be helpful to include the Committee(s) that will be charged with completing the activities.

28. In addition, we are concerned that this MTP does not adequately address the issue of the need for timely, high quality, transparent scientific support for Codex's work. This may be addressed elsewhere with FAO/WHO. Yet this underpins Codex work and the outputs are needed to be able to do its work effectively; reference to this activity and output should be included in the MTP.

Specific Comments

29. See the Annex to this paper.

Objective 1: Promoting Sound Regulatory Framework

Programme Area	ID	Activity										
Working principles and procedures	4	<p>Review the terms of reference of "General Subject" Committees to clarify mandates and responsibilities, achieve efficient distribution of work.</p> <p><i>Terms of reference for all General Subject Committees reviewed and amended as necessary.</i></p> <p>Origin of proposal: Draft MTP</p> <p>Status: Time limited Begin: 2003 End: 2005</p> <p>Notes: Section in the PM on endorsements between Commodity and General Subject Committees should probably be revised or abolished as redundant.</p> <p>Estimated Costs: \$12,000 Staff Time P/m: 1</p> <table> <tr> <td>Consultants:</td> <td>\$0</td> </tr> <tr> <td>Contracts:</td> <td>\$0</td> </tr> <tr> <td>Travel:</td> <td>\$4,500</td> </tr> <tr> <td>Documents:</td> <td>\$7,500</td> </tr> <tr> <td>Other Costs:</td> <td>\$0</td> </tr> </table>	Consultants:	\$0	Contracts:	\$0	Travel:	\$4,500	Documents:	\$7,500	Other Costs:	\$0
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Travel:	\$4,500											
Documents:	\$7,500											
Other Costs:	\$0											

U.S. Comments: The U.S. disagrees with the "Notes (comments by the Secretariat) which indicate that the Section in the Procedural Manual on endorsements between Commodity and General Subject Committees should be revised or abolished as redundant. There is a continuing problem within Codex of how Commodity and General Subject Committees relate. The Section of the Procedural Manual referred to should not be abolished as redundant. Rather this section should be strengthened and clarified. It is important, for consistency within Codex, that Commodity Commodities not duplicate or modify the work of General Subject Committees, without explicit and persuasive justification.

EC Comments: The clarification of the division of tasks between the horizontal Committees on one hand and the vertical commodity Committees on the other hand appears important for example for additives. Contradiction and duplication of work must be avoided. Where relevant, a reduction of the number of committees and meetings particularly helps developing countries to spend their tight financial resources effectively on essential Codex Work.

CI Comments: Within any revised terms of reference for all Codex committees (and within ID 18 referring to integrated criteria for commodity and general subject areas) CI stresses that Health Protection of Consumers should be paramount. This should be added to the text above, and that in ID 18.

This work should begin and be completed as soon as possible.

Working principles and procedures

- 18 Review the Criteria for Establishment of Work Priorities to provide for an integrated set of criteria covering commodity and general subject areas

Revised criteria adopted by the CAC.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** 2003 **End:** 2005

Notes: Revised criteria require statements of the food safety, suitability and essential quality objectives to be attained; time-frame; potential obstacles; consensus options.

Estimated Costs:	\$17,000	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$4,500		
Documents:	\$12,500		
Other Costs:	\$0		

U.S. Comments: The U.S. agrees that this is important work for Codex.

Standards development

- 21 Review the General Standard for Labelling to recognize and facilitate the use of the Internet and other advances in information technology as additional mechanisms for consumer information and communication with consumers

Review in 2003; amendments to the General Standard as appropriate by 2007

Origin of proposal: Draft MTP/CI

Status: Time limited **Begin:** 2003 **End:** 2007

Notes:

Estimated Costs:	\$7,200	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$1,200		
Documents:	\$6,000		
Other Costs:	\$0		

U.S. Comments: The U.S. questions whether this activity is within the mandate of Codex. Counsel for FAO has consistently ruled that advertising is outside the mandate of Codex. We believe that most uses of the Internet or other information technologies would be considered "advertising". Even if it were determined that some or all uses of the Internet were within the mandate of Codex, we would question the priority of this activity given that many consumers throughout the world have limited or no access to technologies such as the Internet. Further, the Commission has not discussed how Codex would address this area, or even if Codex could address the use of the Internet. Until there is direction from the FAO Counsel and a further discussion in the Commission, we believe that this "Activity" should be deleted from the Medium Term Plan.

Standards development 22 Establish international principles/guidelines for assuring product integrity and traceability of food products/ingredients through various links in the food chain

Guidelines drafted by CCGP and CCFICS in association with CCMAS and other Committees as required adopted by the CAC.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** Prior work **End:** 2005

Notes:

Estimated Costs:	\$21,000	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$9,000		
Documents:	\$12,000		
Other Costs:	\$0		

Cuba Comments: We agree with what it is proposed. However, we believe that this activity should be speeded up as these products are being traded in many countries and others receive them as donations.

U.S. Comments: The U.S. believes that the explanatory notes provided for this activity are inconsistent with the decision of the 49th Executive Committee. (ALINORM 01/04, paras. 29-32). The description of this activity should be rewritten to recognize two completely separate justifications for “traceability” (having a food safety objective (i.e., as an SPS measure) or having a legitimate objective as a TBT measure) and the priority given by the Executive Committee (a risk management option in the Working Principles for Risk Analysis). The U.S. suggests the following wording:
 22 Establish international principles/guidelines for traceability of food products/ingredients through various links in the food chain, (a) as a priority, for public health reasons as a risk management option, and (b) secondarily as having a legitimate objective in a technical measure.

CI Comments: CI recommends that since CCFH is currently working on traceability, and as a (relative to other Codex Committees) public health, food safety oriented committee - particularly as compared to CCFIECS - that CCFH be specifically mentioned in this context. Traceability is essential for food safety and none of above mentioned Codex committees deal with this in the detail necessary to ensure traceability of food with reference to food safety and hygiene.

Standards development	25 Elaborate international standards or guidelines for the production, processing, labelling and marketing of foods derived from biotechnology <i>Standards or guidelines for specific foods or food groups adopted by CAC in 2007.</i> Origin of proposal: Draft MTP Status: Time limited Begin: 2003 End: 2007 Notes: Estimated Costs: \$26,000 Staff Time P/m: 2 Consultants: \$0 Contracts: \$0 Travel: \$6,000 Documents: \$15,000 Other Costs: \$5,000
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Cuba Comments: We agree with what it is proposed. However, we believe that this activity should be speeded up as these products are being traded in many countries and others receive them as donations.

U.S Comments: The U.S. disagrees with this activity as written. The only guidelines referred to should be for the safety evaluation of foods derived through biotechnology. There has been no discussion within Codex on the elaboration of guidelines for production or processing or how Codex could approach these issues beyond the guidance already provided by CCFH, for example, on primary production, HACCP, or other hygiene provisions. Further, we question the mentioning of “marketing” in this activity. The phrasing used to describe this activity appears to have been patterned after the organic document, yet this is a significantly different situation. Also, the explanatory material provided by the Secretariat appears to go beyond what has been discussed in CAC or the Executive Committee by referring to standards or guidelines for specific foods or food groups. There should not be separate standards for foods based solely on method of production. This activity is shown to be initiated in 2003. We believe that this activity is already on-going and should be limited in scope to what Codex has already agreed to undertake. The U.S. would re-write this activity as follows:

25 Elaborate international standards or guidelines for the safety evaluation and labelling of foods derived from biotechnology.

EC Comments: The European Community suggests using the term “modern biotechnology” already used by CCFL. To further improve on clarity, adding the words “genetic modification/genetic engineering” between brackets should be considered.

CI Comment: CI agrees with the need for setting international rules to regulate the production, processing, labelling and marketing of products derived from biotechnology. This would encourage consumers’ confidence in the work carried out by Codex Alimentarius. In addition, Codex must take into account that socio-economic and cultural factors in different geographic regions can mean big differences in the making of standards in food security.

The term ‘modern biotechnology’ can be confusing amongst consumers who are used to terms such as ‘genetically modified’ or ‘genetically engineered’. This term should be changed to the more accepted terms of ‘genetically modified’ or ‘genetically engineered’.

This is essential work for consumer confidence in Codex and must be progressed urgently. This work should be completed as soon as possible.

Standards development	27	<p>Application of guidelines on the judgement of equivalence for specific purposes such as equivalence of measures to ensure food hygiene or measures to ensure conformity with essential quality requirements</p> <p><i>Specific guidelines on SPS measures to be developed by relevant Codex Committees as required. Generic guidelines for the judgement of equivalence of systems associated with measures other than sanitary requirements completed by 2005.</i></p> <p>Origin of proposal: Draft MTP/Secretariat</p> <p>Status: Time limited Begin: Prior work End: 2007</p> <p>Notes:</p> <table border="0"> <tr> <td>Estimated Costs:</td> <td>\$15,500</td> <td>Staff Time P/m:</td> <td>2</td> </tr> <tr> <td> Consultants:</td> <td>\$5,000</td> <td></td> <td></td> </tr> <tr> <td> Contracts:</td> <td>\$0</td> <td></td> <td></td> </tr> <tr> <td> Travel:</td> <td>\$4,500</td> <td></td> <td></td> </tr> <tr> <td> Documents:</td> <td>\$6,000</td> <td></td> <td></td> </tr> <tr> <td> Other Costs:</td> <td>\$0</td> <td></td> <td></td> </tr> </table>	Estimated Costs:	\$15,500	Staff Time P/m:	2	Consultants:	\$5,000			Contracts:	\$0			Travel:	\$4,500			Documents:	\$6,000			Other Costs:	\$0		
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Contracts:	\$0																									
Travel:	\$4,500																									
Documents:	\$6,000																									
Other Costs:	\$0																									

Brazil comments: The activity should be renamed "Development of Guidelines", since 'enforcement' is an attribution of Governments, not Codex

U.S. Comments: The U.S. finds that the explanatory material provided by the Secretariat to be confusing. The Circular Letter speaks of specific guidelines by relevant committees. We question whether there is a need for individual committees to develop separate guidelines on the judgement of equivalence for individual standards or to compare different measures, applying the generic guidelines, to determine equivalence. Rather, we believe that countries either bilaterally or multilaterally, can determine equivalence of specific measures, based on guidelines developed by Codex. We also believe that this responds to Recommendation 13 of the Melbourne Conference regarding the urgency of a Codex guidance on the judgement of equivalence. Therefore, the U.S. would re-write this activity as follows:

27 Develop guidelines on the judgement of equivalence for specific purposes such as equivalence of inspection and certification systems, measures to ensure food hygiene, or measures to ensure conformity with essential quality requirements.

CI Comments: add "food safety and" quality requirements.

- Standards development 28 Establish model framework for food regulation and control to facilitate the development of sound food control structures at the national level and enable the application of mutual recognition principles to trade

Model or framework legislation and guidelines adopted by the CAC.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** 2003 **End:** 2007

Notes: The Secretariat questions this activity which seems to duplicate existing work of FAO and WHO.

Estimated Costs:	\$30,000	Staff Time P/m:	2
Consultants:	\$12,000		
Contracts:	\$0		
Travel:	\$6,000		
Documents:	\$12,000		
Other Costs:	\$0		

Cuba Comments: If the term "mutual recognition" covers also accredited laboratories and their essay reports, the compatibility with the ILAC regulations, in order to facilitate the establishment of sound food control structures and food trade, should be considered.

U.S. Comments: The U.S. believes that, before adopting this activity, there needs to be further discussion within Codex to clarify the issue raised by the Secretariat (i.e., is this activity within the mandate of Codex). If it is determined that this is appropriate for Codex to undertake this activity, there needs to be discussion of how (within which committees, etc.) this would be accomplished.

CI Comment: CI considers that this is important work but it appears to be rather obscure: rather than deleting it we suggest that the detail should be specified.

EC Comments: The European Community supports the Secretariat's assessment that this work is not a task for Codex and suggests its deletion from the Work Programme.

- 41 EC03: Code of Practice on Animal Feeding - extension of work programme.

Origin of proposal: European Community

Status: Time limited **Begin:** Prior work **End:** 2007

Notes:

Estimated Costs:	\$24,000	Staff Time P/m:	3
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$12,000		
Documents:	\$12,000		
Other Costs:	\$0		

EC Comments: The European Community would like to propose that the extension of the work period of the Ad Hoc Intergovernmental Codex Task Force on Animal Feeding should be included in the Medium term plan 2003-2007 for the following reasons:

The Task Force is developing a Code of practice on Good Animal Feeding that is expected to be finalised by the end of the above-referred period. Nevertheless, other aspects related to animal feeding included in parts (b) and (c) of the terms of reference hereunder referred, which are important to food safety, cannot be addressed by the Task Force due to time constrains. Consequently, the period for this Task Force should be extended 4 years more.

Standards development

42 Providing Secretariat services to the Codex Alimentarius Commission and the Executive Committee

Origin of proposal: Secretariat

Status: On-going **Begin:** **End:**

Notes: New Activity included to cover the routine meetings of the Commission and Executive Committee.

Estimated Costs: **\$289,000** **Staff Time P/m:** 6

Consultants:	\$10,000
Contracts:	\$15,000
Travel:	\$25,000
Documents:	\$189,000
Other Costs:	\$50,000

44 Providng Secretariat services to Codex General Subject and Commodity Committees and Task Forces

Origin of proposal: Secretariat

Status: On-going **Begin:** 2003 **End:** 2007

Notes: New activity to cover routine services to the Commission's subsidiary bodies.

Estimated Costs: **\$629,000** **Staff Time P/m:** 75

Consultants:	\$0
Contracts:	\$0
Travel:	\$105,000
Documents:	\$500,000
Other Costs:	\$24,000

Total Biennial Costs for this Objective:

Time:	97 Person/months
Consultants:	\$27,000
Contracts:	\$15,000
Travel:	\$177,700
Documents:	\$772,000
Other Costs:	\$79,000
Total Estimated Cost:	\$1,070,700

Objective 2: Promoting Widest and Consistent Application of Scientific Principles and Risk Analysis

Programme Area	ID	Activity																		
Working principles and procedures	2	<p>Review Codex standards etc to provide risk management options (measures) to achieve national ALOPs taking into account risk assessments and other legitimate factors essential to the decision-making process</p> <p><i>Standards, guidelines and other recommendations that demonstrate available options to meet ALOPs</i></p> <p>Origin of proposal: Secretariat</p> <p>Status: On-going Begin: 2003 End: 2007</p> <p>Notes:</p> <table> <tr> <td>Estimated Costs:</td> <td>\$45,500</td> <td>Staff Time P/m: 1</td> </tr> <tr> <td> Consultants:</td> <td>\$15,000</td> <td></td> </tr> <tr> <td> Contracts:</td> <td>\$0</td> <td></td> </tr> <tr> <td> Travel:</td> <td>\$4,500</td> <td></td> </tr> <tr> <td> Documents:</td> <td>\$25,000</td> <td></td> </tr> <tr> <td> Other Costs:</td> <td>\$1,000</td> <td></td> </tr> </table>	Estimated Costs:	\$45,500	Staff Time P/m: 1	Consultants:	\$15,000		Contracts:	\$0		Travel:	\$4,500		Documents:	\$25,000		Other Costs:	\$1,000	
Estimated Costs:	\$45,500	Staff Time P/m: 1																		
Consultants:	\$15,000																			
Contracts:	\$0																			
Travel:	\$4,500																			
Documents:	\$25,000																			
Other Costs:	\$1,000																			

Cuba Comments: Risk management options for GMOs should also be provided. They should also be included in the communication, advocacy and promotion.

U.S. Comments: This is a new activity (i.e., not on previous versions of the Medium Term Plan) and the U.S. is confused about the Secretariat's intent. Codex committees could, perhaps in consultation with risk assessors, provide a number of risk management options and an indication of the level of protection that each would achieve. However, it is up to member countries to determine their own ALOP's and then to determine whether a specific measure achieves that ALOP. Additionally, a review of Codex standards for this purpose is a major undertaking and is extremely complex. The Staff Time and Cost assigned are inadequate. Also, the reference to consideration of "other legitimate factors" is confusing. There are criteria for consideration of other factors within Codex, but member countries may approach consideration of other factors in a number of ways. The U.S. would re-write this activity as follows:

2 Review Codex standards etc., to provide risk management options (measures) to achieve specified levels of protection, taking into account risk assessments.

Working principles and procedures

- 9 Implement the Action Plan on Risk Analysis on a consistent, Codex-wide basis.
Relevant Committees develop risk assessment policies and exert an appropriate risk management role in relation to expert bodies. Implementation report to be provided to CAC in 2007.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** Prior work **End:** 2007

Notes:

Estimated Costs:	\$24,000	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$4,500		
Travel:	\$4,500		
Documents:	\$15,000		
Other Costs:	\$0		

U.S. Comments: The only concern that the U.S. has with this activity is the referral to “Action Plan”. Recent discussion of “action plan” within Codex has referred to the Chair’s Action Plan. Reference to the earlier “Action Plan for Risk Analysis” is potentially confusing. The U.S. suggests that the description of the activity be simplified as follows:
 9 Ensure the consistency of Risk Analysis on a Codex-wide basis.

CI Comment: The importance of developing Risk Assessment Policies (RAP) must be stressed. CI considers that while some committees have begun addressing this matter it may be necessary for them to develop more than one RAP.

Standards development

- 6 Develop systematic guidelines for pre-harvest and post-harvest measures for ensuring consumer health protection and fair practices in food trade.

Guidelines extending the application of the Recommended International Code of Practice - General Principles of Food Hygiene adopted by the CAC 2005; consequential amendments to other Codes and guidelines by 2007.

Origin of proposal: Draft MTP/CI

Status: Time limited **Begin:** Prior work **End:** 2007

Notes:

Estimated Costs:	\$32,500	Staff Time P/m:	2
Consultants:	\$16,000		
Contracts:	\$0		
Travel:	\$4,500		
Documents:	\$12,000		
Other Costs:	\$0		

U.S. Comments: There is a significant change in this activity from what was reviewed earlier. The previous version of the MTP referred only to “pre-harvest” and was an attempt to focus specific attention on pre-harvest activities. This is a significant food safety area, in which Codex has had only limited involvement and focusing an activity in the MTP on pre-harvest appeared appropriate. It also appeared consistent with Recommendation 18 of the Melbourne Conference to promote and extend the General Principles of Food Hygiene and HACCP to the whole food chain. However, with the inclusion of “post-harvest” the activity appears to encompass all of Codex activity and as such has become somewhat redundant with Activity 24. The U.S. believes that there is merit in recognizing an activity in the MTP focused on “pre-harvest”, and would re-write the description as follows:

6 Develop systematic guidelines for pre-harvest measures for ensuring consumer health protection and fair practices in food trade.

Standards development 7 Establish guidance for the safe and prudent use of antimicrobial substances in food production and other measures to contain antimicrobial resistance.

Guidelines adopted by CAC in 2005.

Origin of proposal: Draft MTP/CI

Status: Time limited **Begin:** Prior work **End:** 2005

Notes:

Estimated Costs:	\$13,500	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$4,500		
Documents:	\$9,000		
Other Costs:	\$0		

Brazil Comments: This activity should be planned in such a way that allow its actual development.

U.S Comments: The description of this activity has been significantly altered from previous versions of the MTP. The reference to “other measures to contain anti-microbial resistance” has been added, and it is extremely unclear as to what is intended. The U.S. believes that this activity should be rewritten to reflect the guidance provided by the Executive Committee in its 48th session and reaffirmed at its 49th session, as follows:
 7 Establish guidance for the safe and prudent use of anti-microbial substances in food production.

CI Comment: This issue is of paramount concern for the health protection of consumers. CI fully supports this work and considers it to be essential for Codex to address - it cannot be delegated to OIE or WHO.

Standards development

- 11 Extension of coverage of MRLs for pesticides and veterinary drugs and limits for contaminants to include products of particular interest to developing member countries while giving priorities to compounds most likely to impact on the health of consumers.

MRLs, MLs or other recommendations for at least 15 commodities of interest to developing countries developed by CCPR, CCRVDF, CCFAC and CCFH and adopted by the Commission.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** Prior work **End:** 2007

Notes: This work requires close cooperation with JECFA/JMPR/JEMRA.

Estimated Costs:	\$15,000	Staff Time P/m:	4
Consultants:	\$6,000		
Contracts:	\$0		
Travel:	\$4,500		
Documents:	\$4,500		
Other Costs:	\$0		

Brazil Comments: This activity should be planned in such a way that allow its actual development.

U.S. Comments: Again, this activity has been altered to become less clear. Developing countries have expressed concern that, because data for pesticides, veterinary drugs, and contaminants were predominantly from developed countries, Codex gave undue emphasis to MRL's that were of importance to the developed countries. This activity in the MTP was devised to instruct Codex to extend MRL consideration to products of particular interest to developing countries. In developing MRL's, the expert committees and the Codex committees consider health impacts. However, the instruction that has been added for Codex to give "priorities to compounds most likely to impact on the health of consumers" makes it much less clear about what is intended or how Codex would achieve this activity. The U.S. would re-write this activity, as follows:

11 Extension of coverage of MRL's for pesticides and veterinary drugs and limits for contaminants to include products of particular interest to developing member countries.

EC Comments: The expansion of the work of the appropriate Committees for residue questions to products and residues, which are particularly important for developing countries appears long overdue and very welcome. The absence of MRLs for these products represents indirectly a large barrier to trade for many developing countries. The pending work should be very much supported and co-ordinated by initiatives for example of the European Union within the framework of the Pesticide Initiative Programme (PIP).

CI Comment: CI welcomes and fully supports this activity.

- Standards development 20 Ensure that global data on dietary intake and other important nutritional parameters are used in the establishment of new standards and in reviews of existing standards

See Activity No. 1

Origin of proposal: Draft MTP

Status: Time limited **Begin:** 2003 **End:** 2005

Notes: Combine with Activity ID 1

Estimated Costs: **\$48,500** **Staff Time P/m:** 4

Consultants: \$10,000

Contracts: \$10,000

Travel: \$4,500

Documents: \$24,000

Other Costs: \$0

Brazil Comments: This activity should be planned in such a way that allow its actual development.

U.S. Comments: The U.S. believes that this activity should be rewritten to reflect the World Health Assembly Resolution and the recommendations of the Melbourne Conference (ALINORM 01/41, para.44). Also, the U.S. believes that the activity should be designated as an “on-going” rather than as “time-limited”. The instructions (in “Notes”) to combine with Activity ID 1 are a bit strange, to say the least. Activity ID 1 is a risk communication activity? Finally, “other important nutritional parameters” should be further defined, particularly as to what is within the mandate of Codex. The U.S. would re-write the activity, as follows:

20. Make the largest possible use of information from developing countries in risk assessment for international standard setting and in reviews of existing standards.

EC Comment: For many countries the absence of data on dietary intake represents a large problem within the framework of the risk assessment. Therefore, this activity is to be welcomed. However, the reference to the activity number 1 appears incomprehensible.

- 24 Review and update principles and guidelines for the safe production and processing technologies

Review of the relevant Codes of [Hygienic] Practice - revisions adopted by CAC in 2007.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** Prior work **End:** 2007

Notes: May be combined with with Activity ID 6.

Estimated Costs: **\$46,500** **Staff Time P/m:** 3

Consultants: \$25,000

Contracts: \$0

Travel: \$6,500

Documents: \$15,000

Other Costs: \$0

U.S. Comments: If Activity 6 is retained as currently written, this activity becomes redundant and may be combined with 6. However, the U.S. believes that there is merit in focusing on “pre-harvest” and production as separate activities and would retain this activity as written.

Standards development

- 30 Guidelines on reliability of sampling and test methods to determine compliance with standards

Guidelines on sampling adopted by CAC (2003); data base on test methods established (2005) and updated regularly.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** Prior work **End:** 2005

Notes:

Estimated Costs:	\$31,500	Staff Time P/m:	2
Consultants:	\$6,000		
Contracts:	\$15,000		
Travel:	\$4,500		
Documents:	\$6,000		
Other Costs:	\$0		

Brazil Comments: The methods of analysis for detection fo GMOs should be prioritized.

U.S. Comments: The Notes by the Secretariat expand the scope of this activity from merely developing guidelines to also developing a database. If Codex is to develop a database, then Codex should develop criteria for updating such a database. Therefore, the U.S. would re-write this activity as follows:
30 Guidelines on reliability, and criteria for review, of sampling and test methods to determine compliance with standards.

- 33 Develop guidelines and/or recommendations for management of microbiological risk(s) for specific pathogen-commodity combinations on the basis of risk assessments or other available information

Framework document for management of microbiological risk by 2005; where appropriate specific guidelines and/or recommendations for managing microbiological risk(s).

Origin of proposal: Draft MTP

Status: On-going **Begin:** Prior work **End:** 2007

Notes:

Estimated Costs:	\$33,000	Staff Time P/m:	4
Consultants:	\$15,000		
Contracts:	\$0		
Travel:	\$6,000		
Documents:	\$12,000		
Other Costs:	\$0		

U.S. Comments: The U.S. questions the addition of the phrase “or other available information”. The guidelines and/or recommendations for management of microbiological risks should be based upon risk assessment. The reference to “other information” has been inappropriately added and should be deleted. Therefore, the U.S. would re-write the activity, as follows:

33 Develop guidelines and/or recommendations for management of microbiological risk(s) for specific pathogen-commodity combinations on the basis of risk assessments.

Standards development

35 US1 Review and strengthen Codex guidance on exchange of information about potentially hazardous foodstuffs moving in international trade.

Origin of proposal: United States

Status: On-going **Begin:** 2003 **End:** 2007

Notes:

Estimated Costs:	\$20,500	Staff Time P/m:	2
Consultants:	\$10,000		
Contracts:	\$0		
Travel:	\$4,500		
Documents:	\$6,000		
Other Costs:	\$0		

US Comments: Recommendation 12 of the Melbourne Conference was for the exchange of information about potentially hazardous foodstuffs moving in international trade. This recommendation was endorsed by the 24th CAC. Codex has some guidance on information exchange, but the U.S. believes that this guidance could be significantly enhanced. Also, the existing guidance should be reviewed in light of more recent events (e.g., dioxin in animal feed, potential food terrorism, etc.) The U.S. believes that a specific activity should be incorporated into the Medium Term Plan, recognizing the recommendation of the Melbourne Conference.

39 EC01: Establish international guidelines for the implementation by the governments of risk analysis principles and for the use of precaution when scientific data are insufficient or incomplete.

Origin of proposal: European Community

Status: Time limited **Begin:** Prior work **End:** 2005

Notes:

Estimated Costs:	\$7,200	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$1,200		
Documents:	\$6,000		
Other Costs:	\$0		

EC Comments: These guidelines are needed to help member governments in setting national standards and to avoid the misuse of precaution such that it gives rise to arbitrary or unjustifiable restriction on international food trade. The 24th Session of the Codex Alimentarius Commission confirmed the initial mandate of the Committee on General Principles to complete the principles for risk analysis within Codex as a high priority, with a view to their adoption in 2003. It also agreed that the Committee should develop guidance to governments subsequently or in parallel, as appropriate in view of its programme of work (Alinorm 01/41, para 81,83).

Communication, advocacy and promotion 1 Develop guidelines for risk communication on appropriate means of consulting/communicating with consumers and other interested parties.

Guidelines developed and published.

Origin of proposal: EC

Status: Time limited **Begin:** 2003 **End:** 2007

Notes:

Estimated Costs:	\$26,500	Staff Time P/m:	2
Consultants:	\$10,000		
Contracts:	\$0		
Travel:	\$1,500		
Documents:	\$15,000		
Other Costs:	\$0		

U.S. Comments: As drafted, the activity focuses only on consumers and other interested parties. It is also important for Codex to develop guidelines for communication between risk assessors and risk managers and for communication with member governments and interested stakeholders. The U.S. would re-write this activity, as follows:
 1 Develop guidelines for risk communication, within Codex, between Codex and interested parties, and between member governments and all stakeholders.

EC Comment: The European Community believes that improving risk communication with consumers is a key feature of building trust in the food chain and in the international standards.

CI's comment
 Within any revised terms of reference for all Codex committees (and within ID 18 referring to integrated criteria for commodity and general subject areas) CI stresses that Health Protection of Consumers should be paramount. This should be added to the text above, and that in ID 18.
 This work should begin and be completed as soon as possible.
 CI Comments: CI fully supports this proposal. We are not however clear who would be responsible for the activity. CI could possibly offer its assistance and expertise to this work.

Total Biennial Costs for this Objective:

Time:	30 Person/months
Consultants:	\$113,000
Contracts:	\$29,500
Travel:	\$51,200
Documents:	\$149,500
Other Costs:	\$1,000
Total Estimated Cost:	\$344,200

Objective 3: Promoting Linkages between Codex and other Multilateral Regulatory Instruments and Conventions

Programme Area	ID	Activity
Working principles and procedures	12	<p>Establish guidelines for the development of standards and related texts in cooperation with other international intergovernmental organizations, either as joint standards or as Codex standards</p> <p><i>Guidelines adopted by CAC in 2005.</i></p> <p>Origin of proposal: CAC24</p> <p>Status: Time limited Begin: 2003 End: 2005</p> <p>Notes: Combine with Activity No. 7</p> <p>Estimated Costs: \$12,000 Staff Time P/m: 2</p> <p> Consultants: \$0</p> <p> Contracts: \$0</p> <p> Travel: \$6,000</p> <p> Documents: \$6,000</p> <p> Other Costs: \$0</p>

U.S. Comments: The U.S. questions whether this is what was intended by the Commission (ALINORM 01/41, para.31). The CAC was referring to guidelines for the development of Codex standards by international organizations that possess particular experience and expertise. It is clear that there needs to be a standardized procedure for Codex to be able to take advantage of such expertise, with recognition that the end product must be a Codex standard that progresses through the Codex step process. Therefore, the U.S. would re-write this activity, as follows:

12 Develop guidance on co-operation with other International Intergovernmental Organizations on the elaboration of Codex Standards and related texts.

EC Comments: The development on the linkages of the activities and regulations of Codex Alimentarius, the International Plant Protection Convention, the Office International des Epizooties and other relevant international bodies and conventions is very welcomed. Thereby, duplication of work is avoided or reduced and consistency in the international standards is reached.

The association of the activity 12 and the activity 7 does not appear understandable. It is probably more associated with ID 8 instead of 7.

Working principles and procedures

- 13 Integrate and align food risk analysis principles with other areas of biosecurity (animal and plant health) as envisaged in the FAO Strategic Framework

Review of the Codex Principles on Risk Analysis for consistency with other international instruments (2005); amendments as appropriate by 2007.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** 2003 **End:** 2007

Notes:

Estimated Costs:	\$30,500	Staff Time P/m:	1
Consultants:	\$6,000		
Contracts:	\$0		
Travel:	\$12,500		
Documents:	\$12,000		
Other Costs:	\$0		

U.S. Comments: While the U.S. supports consistency among OIE and IPPC standards, to the greatest extent possible, there are questions of how this integration and alignment would be accomplished and whether such activities are within the mandate of Codex or should be undertaken by some other body. The U.S. would re-write this activity, as follows:
 13 Review and up-date Codex food risk analysis principles for consistency, to the extent possible, with other areas of biosecurity (animal and plant health) as envisaged in the FAO Strategic Framework.

EC Comments: The development on the linkages of the activities and regulations of Codex Alimentarius, the International Plant Protection Convention, the Office International des Epizooties and other relevant international bodies and conventions is very welcomed. Thereby, duplication of work is avoided or reduced and consistency in the international standards is reached.

Working principles and procedures

- 32 Review and up-dating of the General Principles of the Codex Alimentarius (and their associated Guidelines) to take into account other multi-lateral Agreements and Conventions
General Principles of the Codex Alimentarius revised to take into account SPS/TBT and other legally binding international instruments, and published in the Procedural Manual.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** 2003 **End:** 2007

Notes:

Estimated Costs:	\$10,500	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$4,500		
Documents:	\$6,000		
Other Costs:	\$0		

Cuba Comments: We believe that ILAC's views on agreements and multilateral conventions should be revised or considered. This prevents essay laboratories from being subject to different regulations.

U.S. Comments: The U.S. agrees that Codex principles and associated guidelines should be consistent with member country obligations under WTO and the trade agreements. Therefore, the U.S. would re-write this activity, as follows:

Review and up-dating of the General Principles of the Codex Alimentarius (and their associated Guidelines) to ensure consistency with member country obligations under WTO and the trade agreements.

EC Comments: The development on the linkages of the activities and regulations of Codex Alimentarius, the International Plant Protection Convention, the Office International des Epizooties and other relevant international bodies and conventions is very welcomed. Thereby, duplication of work is avoided or reduced and consistency in the international standards is reached.

Standards development

- 34 Integration into the Codex Alimentarius of OIE standards and other recommendations for the management of food-borne zoonoses (and vice versa).

References to relevant sections of the OIE Animal Health and Aquatic Animal Health Codes in the Codex Alimentarius, perhaps in joint publications. Reference in the OIE codex to relevant sections of the Codex Alimentarius dealing with residue management (pesticides and veterinary drugs).

Origin of proposal: Secretariat

Status: Time limited **Begin:** 2003 **End:** 2007

Notes: Start will depend on progress on Activity No. 7.

Estimated Costs:	\$36,000	Staff Time P/m:	3
Consultants:	\$12,000		
Contracts:	\$0		
Travel:	\$6,000		
Documents:	\$18,000		
Other Costs:	\$0		

U.S Comments: Again, while the U.S. supports consistency with OIE standards, to the greatest extent possible, there are questions of how this integration would be accomplished and whether such activities are within the mandate of Codex. Therefore, the U.S. would re-write this activity, as follows:

34 Review and up-date Codex standards and related texts for consistency, to the extent possible, with OIE standards and other recommendations for the management of food-borne zoonoses (and vice versa).

EC Comments: The development on the linkages of the activities and regulations of Codex Alimentarius, the International Plant Protection Convention, the Office International des Epizooties and other relevant international bodies and conventions is very welcomed. Thereby, duplication of work is avoided or reduced and consistency in the international standards is reached.

- 36 US2 Review Codex standards for overly prescriptive or unnecessarily stringent provisions and remove such provisions.

Origin of proposal: United States

Status: On-going **Begin:** 2003 **End:** 2007

Notes:

Estimated Costs:	\$16,000	Staff Time P/m:	2
Consultants:	\$10,000		
Contracts:	\$0		
Travel:	\$0		
Documents:	\$6,000		
Other Costs:	\$0		

US Comment: Recommendation 17 of the Melbourne Conference calls for Codex standards not to be overly prescriptive or unnecessarily stringent. The U.S. believes that consistent application of scientific principles will result in standards that are not overly prescriptive or unnecessarily stringent. However, many Codex standards are now several decades old and may contain unnecessary provisions. It would also help promote the maximum application of Codex standards if such unnecessary provisions were removed. The U.S. believes that a specific activity should be incorporated into the Medium Term Plan, recognizing the recommendation of the Melbourne Conference, and calling for a review of standards for unnecessary provisions.

Interactions and linkages 8 Promote and encourage collaborative efforts with other relevant international standards bodies to minimise duplicative efforts and ensure greater consistency of outputs

General Guidelines adopted by CAC in 2005. Specific protocols for development of common or joint texts with OIE and other bodies by 2007.

Origin of proposal: Draft MTP

Status: On-going **Begin:** Prior work **End:** 2007

Notes: This work could involve extensive negotiations by FAO and WHO Legal Offices on behalf of the Commission, as relations between the Commission and other Organizations are handled by FAO and WHO (Rule VII.5).

Estimated Costs:	\$24,000	Staff Time P/m:	2
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$12,000		
Documents:	\$12,000		
Other Costs:	\$0		

U.S Comments: The U.S. believes that this activity should refer to “interactions” rather than collaborative efforts. Such phrasing appears to be more consistent with discussions at the 24th CAC. Therefore, the U.S. would re-write this activity, as follows:
 8 Promote and encourage interactions with other relevant international standards bodies to minimize duplicative efforts and ensure greater consistency of outputs.

EC Comments: The development on the linkages of the activities and regulations of Codex Alimentarius, the International Plant Protection Convention, the Office International des Epizooties and other relevant international bodies and conventions is very welcomed. Thereby, duplication of work is avoided or reduced and consistency in the international standards is reached.

The European Community suggests replacing the last word “outputs” by “international standards”.

Total Biennial Costs for this Objective:

Time:	12 Person/months
Consultants:	\$28,000
Contracts:	\$0
Travel:	\$41,000
Documents:	\$60,000
Other Costs:	\$0
Total Estimated Cost:	\$129,000

Objective 4: Enhance Capacity to Respond Effectively and Expeditiously to New Issues, Concerns and Developments in the Food Sector

Programme Area	ID	Activity										
Working principles and procedures	3	<p>Revise the Uniform Procedure for the Elaboration of Codex Standards and Related Texts to enable adoption of texts within a maximum of five years (including Internet conferencing).</p> <p><i>CAC to adopt new Procedure(s) by 2005. Internet Conference sites established for CCGP, CCFAC, CCPR, CCRVDF, CCFH and CCFL by 2005</i></p> <p>Origin of proposal: Draft MTP</p> <p>Status: Time limited Begin: 2003 End: 2005</p> <p>Notes: Servicing of Internet Conference sites will require additional staff resources either at the Rome-based Secretariat or in host government Secretariats.</p> <p>Estimated Costs: \$14,500 Staff Time P/m: 1</p> <table> <tr> <td>Consultants:</td> <td>\$0</td> </tr> <tr> <td>Contracts:</td> <td>\$0</td> </tr> <tr> <td>Travel:</td> <td>\$2,500</td> </tr> <tr> <td>Documents:</td> <td>\$12,000</td> </tr> <tr> <td>Other Costs:</td> <td>\$0</td> </tr> </table>	Consultants:	\$0	Contracts:	\$0	Travel:	\$2,500	Documents:	\$12,000	Other Costs:	\$0
Consultants:	\$0											
Contracts:	\$0											
Travel:	\$2,500											
Documents:	\$12,000											
Other Costs:	\$0											

U.S Comments: While the U.S. supports a review, and possible revision, of the Uniform Procedure for the Elaboration of Codex Standards and Related Texts, the “maximum of five years” appears to be a rather arbitrary time frame. Even with Internet conferencing, some standards may take longer than five years. There should be no arbitrary cut-off date for discussion. Rather we would prefer the wording of the Executive Committee, requesting that the elaboration procedures be reviewed to “see in which manner they could be made more responsive and efficient and take into account modern information technologies for the exchange of views” (ALINORM 01/04, para. 23).

3 Review and revise the Uniform Procedure for the Elaboration of Codex Standards and Related Texts to make them more responsive and efficient and to take into account modern information technologies for the exchange of views (including Internet conferencing).

EC Comments: While agreeing with the overall aim of improving the speed of decision-making within Codex, the European Community believes that it is important to ensure that standards are agreed by consensus. We are familiar with issues becoming stuck within the Codex Step procedure. However the problem is often not with the procedure, but with the inability of the Commission to find a solution that all countries can accept.

The European Community would prefer this Activity to be redrafted to read :

“Evaluate the Uniform Procedure for the Elaboration of Codex Standards and Related Texts against the aim of enabling adoption of texts by consensus or at least by a 2/3 majority (or agreeing to discontinue work) within a maximum of five years, and revise if necessary.”

Working principles and procedures

- 19 Establish systematic procedures for review of existing standards to ensure their continued relevance and application
Systematic procedures adopted for publication in the Procedural Manual.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** 2003 **End:** 2005

Notes: Combine with Activity ID 1

Estimated Costs: **\$31,000** **Staff Time P/m:** 2

Consultants: \$0

Contracts: \$6,000

Travel: \$0

Documents: \$25,000

Other Costs: \$0

U.S Comments: The "Note" that this should be combined with Activity ID 1 is puzzling.

Standards development

- 5 Review MRLs for pesticides and veterinary drugs in light of new information on safety and Good Agricultural/Veterinary Practices, including that from developing countries
MRLs for approximately 50% of substances subjected to period review during the period 2003-2007.

Origin of proposal: Draft MTP

Status: On-going **Begin:** **End:**

Notes: The review will depend on the output available from JECFA and JMPR.

Estimated Costs: **\$42,500** **Staff Time P/m:** 2

Consultants: \$0

Contracts: \$0

Travel: \$10,500

Documents: \$32,000

Other Costs: \$0

Brazil Comments: This activity should be planned in such a way that allow its actual development.

U.S Comments: While the U.S. supports this activity, the selection of 50% by the Secretariat is somewhat arbitrary. We continue to have concerns about the priorities for expenditure of resources by JECFA and JMPR. Far too much emphasis is given to review of older products, while newer, potentially safer products are given lower priority.

EC Comments: To be consistent with ID 11, the European Community suggests adding "and limits for contaminants" after "veterinary drugs". The link between ID 11 and ID 5 should be considered.

Standards development

40 EC02: Dietary intake of pesticide residues

Origin of proposal: European Community

Status: Time limited **Begin:** 2003 **End:** 2005

Notes: Secretariat Note: The proposal could be linked with Activity ID 20.

Estimated Costs:	\$30,000	Staff Time P/m:	4
Consultants:	\$0		
Contracts:	\$24,000		
Travel:	\$0		
Documents:	\$6,000		
Other Costs:	\$0		

EC Comments: The methods for predicting dietary intakes are currently either deterministic or probabilistic. While the deterministic model is relatively simple to apply, there is more controversy with respect to how the probabilistic models should be developed and used. The probabilistic models are very powerful and generally recognised as being the more accurate methodology, but there is a need for some general international guidance to be put in place to define acceptable procedures for developing and using this type of model. The Codex would be the ideal organisation to co-ordinate and harmonise work in this area.

The “Guidelines for predicting dietary intake of pesticide residues (revised)”, WHO 1997, deals with long-term and short-term hazards posed by pesticide residues. In the meantime, a lot of experience with short-term hazards posed by pesticide residues was gained by the JMPR being shortly summarised in the JMPR Report 2000. For the use on the international level it is necessary that this experience be incorporated in updated guidelines including work on ARfD and portions.

Total Biennial Costs for this Objective:

Time:	9 Person/months
Consultants:	\$0
Contracts:	\$30,000
Travel:	\$13,000
Documents:	\$75,000
Other Costs:	\$0
Total Estimated Cost:	\$118,000

Objective 5: Promoting Maximum Membership and Participation

Programme Area	ID	Activity																	
Working principles and procedures	37	US3 Develop guidelines for the consideration of written comments by Codex Committees and ensure their consistent application across all committees.																	
		<p>Origin of proposal: United States</p> <p>Status: On-going Begin: 2003 End: 2007</p> <p>Notes:</p> <table> <tr> <td>Estimated Costs:</td> <td>\$7,200</td> <td>Staff Time P/m: 2</td> </tr> <tr> <td>Consultants:</td> <td>\$0</td> <td></td> </tr> <tr> <td>Contracts:</td> <td>\$0</td> <td></td> </tr> <tr> <td>Travel:</td> <td>\$1,200</td> <td></td> </tr> <tr> <td>Documents:</td> <td>\$6,000</td> <td></td> </tr> <tr> <td>Other Costs:</td> <td>\$0</td> <td></td> </tr> </table>	Estimated Costs:	\$7,200	Staff Time P/m: 2	Consultants:	\$0		Contracts:	\$0		Travel:	\$1,200		Documents:	\$6,000		Other Costs:	\$0
Estimated Costs:	\$7,200	Staff Time P/m: 2																	
Consultants:	\$0																		
Contracts:	\$0																		
Travel:	\$1,200																		
Documents:	\$6,000																		
Other Costs:	\$0																		

Recommendation 21 of the Melbourne Conference calls for effective use of written comments in Codex. Also at the 24th CAC, the Delegation of Mexico emphasized the importance of written comments and stated that there were examples where such written comments had not been properly considered by Codex Committees (ALINORM 01/41, para. 45). However, there continues to be no consistent use of written comments across Codex Committees. The U.S. believes that it would promote participation in Codex if there were guidelines for the consideration of written comments, to which all Committees adhered. The U.S. believes that this should be recognized as an activity in the Medium Term Plan.

38	US4 Develop guidance for the conduct of, and attendance at, working groups, drafting groups, etc. and on the relationship of the outputs of such groups to committee activities, and ensure that such guidance is applied consistently across Codex committees.																		
	<p>Origin of proposal: United States</p> <p>Status: On-going Begin: 2003 End: 2007</p> <p>Notes:</p> <table> <tr> <td>Estimated Costs:</td> <td>\$19,500</td> <td>Staff Time P/m: 2</td> </tr> <tr> <td>Consultants:</td> <td>\$12,000</td> <td></td> </tr> <tr> <td>Contracts:</td> <td>\$0</td> <td></td> </tr> <tr> <td>Travel:</td> <td>\$1,500</td> <td></td> </tr> <tr> <td>Documents:</td> <td>\$6,000</td> <td></td> </tr> <tr> <td>Other Costs:</td> <td>\$0</td> <td></td> </tr> </table>	Estimated Costs:	\$19,500	Staff Time P/m: 2	Consultants:	\$12,000		Contracts:	\$0		Travel:	\$1,500		Documents:	\$6,000		Other Costs:	\$0	
Estimated Costs:	\$19,500	Staff Time P/m: 2																	
Consultants:	\$12,000																		
Contracts:	\$0																		
Travel:	\$1,500																		
Documents:	\$6,000																		
Other Costs:	\$0																		

It is evident that the work of Codex can be significantly expedited through efficient use of working groups, drafting groups, workshops and informational seminars. However, these meetings outside of Committee sessions raise serious concerns about equal participation of all members and observers and about transparency. Previous Codex policy appears to have been to discourage such extra meetings. However, the U.S. believes that the interests of Codex would be better served if, instead of remaining silent, Codex were to develop guidelines for the conduct of, and participation in, work groups, drafting groups, etc. Also clear guidance is needed on the differences among the various types of meetings and how such meetings relate to committees. We believe that this issue is of sufficient significance that it should be recognized in the Medium Term Plan.

Standards development	43	Providing Secretariat services to Regional Coordinating Committees.
		Origin of proposal: Secretariat
		Status: On-going Begin: 2003 End: 2007
		Notes:
		Estimated Costs: \$566,000 Staff Time P/m: 10
		Consultants: \$24,000
		Contracts: \$85,000
		Travel: \$45,000
		Documents: \$400,000
		Other Costs: \$12,000
Participation and transparency	14	Encourage host countries to hold more Codex Committee sessions in developing countries to assist their participation <i>At least 2 meetings of Codex Committees per year to be held in developing countries by developed country Host Governments.</i>
		Origin of proposal: Action Plan
		Status: On-going Begin: 2003 End: 2007
		Notes:
		Estimated Costs: \$24,500 Staff Time P/m: 2
		Consultants: \$0
		Contracts: \$15,000
		Travel: \$4,500
		Documents: \$0
		Other Costs: \$5,000

Cuba Comments: In addition to holding Codex committee sessions in developing countries, the rotation of Codex committee sessions in different geographic zones, in order to facilitate the participation of countries from other regions, should also be encouraged.

U.S Comments: The U.S. notes that developing countries did not enthusiastically embrace this activity at the 24th CAC. There was considerably more interest in the Chair's proposal to establish a trust fund to support member country participation. We believe that this activity should be rewritten to reflect the CAC discussion. Also, a less specific activity conforms more accurately with Recommendation 14 of the Melbourne Conference, which calls for Codex to consider the special needs of developing countries. The arbitrary goal of two meetings per year, mentioned in the Secretariat's notes should be deleted.

14 Encourage the participation of developing countries in a number of ways, including support and promotion of the trust fund for participation and hosting more Codex Committee sessions in developing countries.

EC Comments: This activity appears particularly important and meaningful, in order to integrate the developing countries more in Codex work and to offer to their positions a better forum. It should be welcomed expressly.

Participation and transparency 29 Encourage the participation of non governmental organizations at international and national levels

Quantifiable increases of 20% in national stakeholder NGO's participating in national delegations and 10% of international NGOs in Codex meetings.

Origin of proposal: Draft MTP

Status: On-going **Begin:** **End:**

Notes:

Estimated Costs:	\$28,500	Staff Time P/m:	1
Consultants:	\$6,000		
Contracts:	\$12,000		
Travel:	\$4,500		
Documents:	\$6,000		
Other Costs:	\$0		

Cuba Comments: Se deben suministrar también las opciones de riesgos para los OMG, así como incluirlo en la comunicación, promoción y fomento.

U.S Comments: While the U.S. supports encouragement of NGO participation, it must be understood that this is not through the establishment of a trust fund or through use of the trust fund intended to support member country participation. Also, the wording used by the Executive Committee (ALINORM 01/04, para. 25) appears to be appropriate.

29 Seek opportunities for strengthening partnerships with all stakeholders, in particular consumers and their representative organizations, at the global and national levels.

EC Comments: The European Community believes that an ideal position would be to have national delegations of government representatives only, with interested parties attending in their respective INGOs. This would add transparency to Codex. It would also help counter accusations of industry bias in Codex due to the presence of industry representatives on national delegations and the large number of industry INGOs present at meetings. Codex should also encourage and facilitate attendance of the public to observe Codex meetings.

The European Community agrees that consumer/public interest INGOs do experience difficulties in attending Codex meetings due to financial and other constraints. Codex should focus its efforts in increasing attendance of these groups. Therefore we believe that the objective should be redrafted to read:

“Quantifiable increases of 20% of international consumer/public interest NGOs, and of members of the public, at Codex meetings.”

CI Comments: CI fully supports this activity. However, it will be necessary to explicitly and separately track consumer NGO participation, in recognition of the special obstacles consumers face to participation in Codex, particularly at the national level in developing countries. Base line information is needed at the onset.

Total Biennial Costs for this Objective:

Time:	17 Person/months
Consultants:	\$42,000
Contracts:	\$112,000
Travel:	\$56,700
Documents:	\$418,000
Other Costs:	\$17,000
Total Estimated Cost:	\$645,700

Objective 6: Promoting Maximum Application of Codex Standards

Programme Area	ID	Activity																		
Participation and transparency	16	<p>Maintain and improve the Codex website as a ready source of information on food standards and related issues</p> <p><i>Codex website to be available in 5 languages; all Codex standards to be available on request; links to other standards bodies and food regulatory bodies; website to be used for Internet conferencing as part of standards development.</i></p> <p>Origin of proposal: Action Plan</p> <p>Status: On-going Begin: End:</p> <p>Notes:</p> <table> <tr> <td>Estimated Costs:</td> <td>\$42,000</td> <td>Staff Time P/m: 3</td> </tr> <tr> <td>Consultants:</td> <td>\$12,000</td> <td></td> </tr> <tr> <td>Contracts:</td> <td>\$15,000</td> <td></td> </tr> <tr> <td>Travel:</td> <td>\$0</td> <td></td> </tr> <tr> <td>Documents:</td> <td>\$15,000</td> <td></td> </tr> <tr> <td>Other Costs:</td> <td>\$0</td> <td></td> </tr> </table>	Estimated Costs:	\$42,000	Staff Time P/m: 3	Consultants:	\$12,000		Contracts:	\$15,000		Travel:	\$0		Documents:	\$15,000		Other Costs:	\$0	
Estimated Costs:	\$42,000	Staff Time P/m: 3																		
Consultants:	\$12,000																			
Contracts:	\$15,000																			
Travel:	\$0																			
Documents:	\$15,000																			
Other Costs:	\$0																			
<div style="border: 1px solid black; padding: 5px;"> <p>U.S Comments: The U.S. applauds the use of the Codex website and strongly supports its maintenance and improvement.</p> <p>CI Comments: It is important to facilitate and recognise the use of the Internet and other leading technologies as well as additional mechanisms for processing information for consumers. Nevertheless, we must remember that not all the population, and specifically in countries with a degree of lesser development, have easy access to these technologies. For this reason, comprehensive information should be provided in the traditional 'paper format' and this service must be maintained.</p> </div>																				
Communication, advocacy and promotion of Codex standards	31	<p>Ensure availability of Codex standards, guidelines and recommendations to all interested parties</p> <p><i>Provision of "print-on-demand" technology to FAO and WHO country offices, Codex Contact Points and WTO enquiry points for Codex standards by 2005.</i></p> <p>Origin of proposal: Draft MTP</p> <p>Status: On-going Begin: Prior work End: 2005</p> <p>Notes:</p> <table> <tr> <td>Estimated Costs:</td> <td>\$97,000</td> <td>Staff Time P/m: 4</td> </tr> <tr> <td>Consultants:</td> <td>\$0</td> <td></td> </tr> <tr> <td>Contracts:</td> <td>\$25,000</td> <td></td> </tr> <tr> <td>Travel:</td> <td>\$0</td> <td></td> </tr> <tr> <td>Documents:</td> <td>\$60,000</td> <td></td> </tr> <tr> <td>Other Costs:</td> <td>\$12,000</td> <td></td> </tr> </table>	Estimated Costs:	\$97,000	Staff Time P/m: 4	Consultants:	\$0		Contracts:	\$25,000		Travel:	\$0		Documents:	\$60,000		Other Costs:	\$12,000	
Estimated Costs:	\$97,000	Staff Time P/m: 4																		
Consultants:	\$0																			
Contracts:	\$25,000																			
Travel:	\$0																			
Documents:	\$60,000																			
Other Costs:	\$12,000																			
<div style="border: 1px solid black; padding: 5px;"> <p>Cuba Comments: We agree with what it is proposed. It is known that the tendency of IOs is to circulate the documents electronically, eliminating increasingly the dispatch of printed copies. This generates a lot of problems in developing countries due to the no availability of all the modern techniques to read the documents. Therefore, the option of "print-on-demand" is very convenient.</p> <p>U.S. Comments: Support</p> </div>																				

Communication, advocacy and promotion 23 Encourage FAO/WHO to assist in the collection of information about consumer requirements, perceptions, beliefs and motivations concerning food, nutrition and food safety to facilitate risk communication

Report or monograph available by 2005.

Origin of proposal: Draft MTP

Status: Time limited **Begin:** 2003 **End:** 2005

Notes: This is not really quantifiable and not really actionable by the CAC.

Estimated Costs:	\$6,500	Staff Time P/m:	1
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$1,500		
Documents:	\$5,000		
Other Costs:	\$0		

U.S. Comments: The U.S. supports the aim of this activity, but criteria should be established to assure that information collected is representative of consumers worldwide and not just representative of a few consumer organizations in developed countries.

23 Encourage FAO/WHO to assist in the collection of information, which is representative of consumers worldwide, about consumer requirements, perceptions, beliefs and motivations concerning food, nutrition and food safety to facilitate risk communication.

EC Comments: The European Community supports the Secretariat's view that these tasks are not really actionable by the Codex.

Application and use of Codex Standards 10 Promote training and technical assistance programmes aimed at improving understanding and application of risk analysis principles to food safety decision making in developing countries
Annual reports to the CAC on FAO, WHO and other technical assistance.

Origin of proposal: Draft MTP

Status: On-going **Begin:** **End:**

Notes: This is not really quantifiable and not really actionable by the CAC.

Estimated Costs:	\$6,000	Staff Time P/m:	1
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$0		
Documents:	\$6,000		
Other Costs:	\$0		

U.S. Comments: The U.S. believes that Codex can encourage and promote such training and technical assistance and therefore disagrees with the Secretariat's note.

EC Comments: The European Community supports the Secretariat's view that these tasks are not really actionable by the Codex.

Application and use of Codex Standards 15 Encourage member countries to establish sound structures and processes for consultation on Codex matters to ensure effective involvement and participation of all interested parties

Reports to Codex Regional Coordinating Committees and regular published status reports.

Origin of proposal: Draft MTP

Status: On-going **Begin:** **End:**

Notes: This is not really quantifiable and not really actionable by the CAC.

Estimated Costs:	\$10,000	Staff Time P/m: 1
Consultants:	\$0	
Contracts:	\$0	
Travel:	\$0	
Documents:	\$10,000	
Other Costs:	\$0	

U.S. Comments: The U.S. believes that it is important for Codex to encourage the establishment of sound structures and processes for consultation. The Procedural Manual already contains guidelines for Codex Contact Points, which discuss consultation, etc. Therefore, we disagree with the Secretariat's note that this is not actionable by Codex. However, the U.S. questions what further could be done and recommends that this activity be deleted.

17 Work with FAO and WHO to strengthen Codex structures and processes at the national level and to promote wider acceptance and use of Codex standards by members for domestic regulation and trade

Reports to Codex Regional Coordinating Committees and regular published status reports.

Origin of proposal: Draft MTP

Status: On-going **Begin:** **End:**

Notes: This is not really quantifiable and not really actionable by the CAC. Essentially a duplicate of Activity No.10

Estimated Costs:	\$9,000	Staff Time P/m: 2
Consultants:	\$0	
Contracts:	\$0	
Travel:	\$4,500	
Documents:	\$4,500	
Other Costs:	\$0	

U.S. Comments: The U.S. disagrees with the Secretariat's Note that this is not actionable by Codex. The U.S. also disagrees with the Secretariat's suggestion that this be combined with Activity ID 10. These are two separate activities.

Application and use of Codex Standards 26 Promote the application of HACCP and GMP based on the General Principles of Food Hygiene and covering the entire food chain including feedstuffs

Reports to Codex Regional Coordinating Committees and regular published status reports.

Origin of proposal: Draft MTP

Status: On-going **Begin:** **End:**

Notes: This is not really quantifiable and not really actionable by the CAC.

Estimated Costs:	\$6,000	Staff Time P/m:	1
Consultants:	\$0		
Contracts:	\$0		
Travel:	\$0		
Documents:	\$6,000		
Other Costs:	\$0		

U.S. Comments: Again, the U.S. disagrees with the Secretariat’s Note that this is not actionable by Codex.

Total Biennial Costs for this Objective:

Time:	13 Person/months
Consultants:	\$12,000
Contracts:	\$40,000
Travel:	\$6,000
Documents:	\$106,500
Other Costs:	\$12,000
Total Estimated Cost:	\$176,500

MTP Total Biennial Costs:

Time:	178 Person/months
Consultants:	\$222,000
Contracts:	\$226,500
Travel:	\$345,600
Documents:	\$1,581,000
Other Costs:	\$109,000
Total Estimated Cost:	\$2,484,100