

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 5

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

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PROPOSED DRAFT REVISION TO THE CODEX GUIDELINES FOR THE EXCHANGE OF INFORMATION IN FOOD CONTROL EMERGENCY SITUATIONS¹ (CAC/GL 19-1995)

COMMENTS AT STEP 3

ARGENTINA

We have no comments to make with reference to document CX/FICS 02/11/5 (Comments by 30/10/02) “Proposed Draft Revision to the Codex Guidelines for the Exchange of Information in Food Control Emergency Situations” at Step 3, because the material could not be properly studied. However, on initial analysis, we have no major objections.

BANGLADESH

With reference to the above-mentioned subject the undersigned is directed to inform you that we would like to propose some modifications below may be incorporated in the draft.

Page 1 Scope

2 “(..microbiological or chemical agent)” proposed modification “(..microbiological, radio active or chemical agent)”

Page 4

27 “(..microbiological or chemical agent)” proposed modification “(..microbiological radio active or chemical agent)”

Page 6

3 add the following points

- Total number of packages in the lot
- Date of production/packaging
- Date of shipment
- Port of loading
- Port of discharge
- Name of vessel

¹ These draft guidelines are formed by the revision of, and are intended to replace, the *Guidelines for the Exchange of Information in Food Control Emergency Situations* (CAC/GL 19-1995).

Page 8

“Risk assessment phase ...biological, chemical and physical agents” proposed modification “.....biological, radio active, chemical and physical agents”

CANADA

Canada would like to thank Australia and the other members of the drafting group for the revisions made to this document and is pleased to offer the following comments:

GENERAL COMMENT

It is noted that multiple terms are used throughout the text for “competent authority” such as: food control officials, food control authorities, national authorities, competent authority, authorities, and regulatory authorities. A single term should be used consistently throughout the paper. “Government agency having jurisdiction” or “competent authority” are the terms used in adopted CCFICS texts.

SPECIFIC COMMENTS

SCOPE

To ensure that the scope of this paper is not confused with the objective of the exchange of information on rejection(s) of a food consignment which is dealt with in the Guidelines for the Exchange of Information Between Countries on Rejections of Imported Foods (CAC/GL 25-1997), Canada recommends that a reference be made to CAC/GL 25-1997. A new paragraph should be added with the proposed text as follows:

“These guidelines do not apply to import rejections caused by failure to comply with importing country requirements. Information exchange on rejections of imported foods is dealt with in the Guidelines for the Exchange of Information Between Countries on Rejections of Imported Foods (CAC/GL 25-1997)”.

Paragraph 2

The statements “serious untoward health effects” should be amended to eliminate subjectivity in the first and second sentence. We also recommend adding further clarification at the end of the second sentence. Hence, the revised paragraph would be modified as follows:

*These guidelines provide guidance on the exchange of information in food safety emergency situations that apply where there is a clearly identified ~~risk or potential risk of serious untoward health effects~~ **unacceptable risk to the health of consumers** associated with the consumption of a food or foods, **based on a risk assessment where necessary**. These guidelines apply both when the health hazard has been identified (e.g. an identified microbiological or chemical agent) and when the health hazard had not been identified but where the association between consumption of a food and the appearance of ~~serious untoward~~ **these unacceptable** health effects has been established **by epidemiological evidence**. These Guidelines also provide guidance to governments in the development of food safety emergency plans.*

Paragraph 3

Canada suggests replacing “chemicals” with “hazards” in the second sentence to be more inclusive. In addition, the acrylamide example should be removed. Although acrylamide is produced in food as a result of processing, there has been no decision made by WHO, JECFA, etc. that its presence in food is to be considered a food emergency situation.

CONSIDERATION RELATING TO FOOD SAFETY EMERGENCY SITUATIONS

Nature of the health hazard

Paragraph 4

In the first sentence, Canada recommends replacing “clearly and briefly” by “coherently and concisely”. In the second sentence, we recommend replacing “health hazard” by “adverse health effect”. In accordance with our comment on paragraph 3, we also recommend replacing the two occurrences of “chemicals” with “hazards” in the last sentence. Hence, the revised paragraph would be modified as follows:

*The nature of the health hazard should be described ~~clearly and briefly~~ **coherently and concisely**. Whenever possible, the agent (microorganism, chemical, etc.) causing the ~~health hazard~~ **adverse health effect** should be identified. The food safety problem may be caused by an agent that arises from outside the food and becomes incorporated into the food product. The problem may also arise from inherent ~~chemicals~~ **hazards** in food or ~~chemicals~~ **hazards** produced through processing.*

The application of risk analysis to food safety emergency situations and information exchange

Paragraph 5

We recommend deleting the last sentence of the paragraph as it relates to the analysis framework for the elaboration of Codex standards. A more pertinent document to this effect would be the *Proposed Draft Principles for Risk Analysis for Food Safety* currently being discussed at CCGP and which provide guidance to Member Governments. However, as the document is currently under development, it would not be appropriate to reference it.

Paragraph 6

In the world of import and export, the lack of timely provision of detailed information in food safety emergency situations could also be from the importing to the exporting country, in those situations where the problem is identified by the importing country (Ref. Paragraphs 15-19). Therefore, we suggest removing the specific references to importing and exporting countries; i.e. end the first sentence after “detailed information on the situation” and, in the second sentence, delete the word “importing”.

In the last sentence, “evidence approach” should be “evidence-based approach.”

Responsibilities of exporting countries

Paragraph 10

For consistency with paragraph 12, replace “communication by telephone or facsimile” by “the use of telecommunication” in the first sentence.

Paragraph 12

The last sentence should be made more general to include all agricultural inputs that may be the cause of a food safety emergency. We recommend the last sentence be replaced by the following:

*“Similarly, where the food safety emergency arises **as a result of contaminated feed, feed ingredients or other contaminated agricultural inputs**, the source countries of these items should also be notified.”*

Responsibilities of importing countries

Paragraph 15

In accordance with our comments on paragraph 2, clarification is needed as to what constitutes a "significant" risk. We recommend the paragraph be amended as follows:

*When the food control authorities in importing countries detect problems during import control or distribution of foodstuffs, which they consider to pose ~~a significant~~ **an unacceptable** risk to the health of consumers, **based on a risk assessment where necessary**, they should promptly notify the relevant exporting country authority.*

Paragraph 17

In the last sentence, the word "stringent" should be replaced with "trade restrictive" to be as consistent as possible with the SPS Agreement.

Paragraph 18

We suggest deleting the first "available" in the first sentence as follows: "*The appropriateness of the ~~available~~ risk management options available to the regulatory authorities will depend on...*"

Level of food distribution

Paragraph 20

In the first sentence, we suggest replacing "the stage of its distribution" by "the extent of its distribution".

Re-export of food subject to an emergency situation

Canada would like to note that the recommendations under this section (paragraphs 22 to 24) are currently being discussed at CCGP in the context of the *Proposed Draft Revised Code of Ethics for International Trade in Foods*. Provisions regarding re-export to country of origin or to a third country should be in accordance with recommendations in the Code of Ethics.

It is Canada's view that given the scope of the document, i.e. "...food safety emergency situations that apply where there is a clearly identified risk or potential risk of serious untoward health effects...", the relevance of paragraph 22 is questionable.

In addition, in paragraph 23, we believe it is not appropriate to give as an example the shipping of affected foods to a country with a lower ALOP. Canada therefore recommends deleting the segment of the second sentence as follows:

"Consent to receive the affected food may be granted by a third country where, for example, ~~their appropriate level of protection is lower than in the importing country, or where the third country intends to apply a treatment that will render the food safe.~~"

Paragraph 25

We suggest rewriting the end of the first sentence as follows for clarification: *..... to assist in **the management of international food safety emergency situations.***

Paragraph 27

As per the comment made in paragraph 4, we recommend replacing "health hazard" by "adverse health effect" in the first sentence.

Paragraph 29

We suggest to split the 3rd bullet in two: · identification of agencies responsible for supervising recall from the market; and · detaining the product.

ATTACHMENT 1

2. Nature of the health hazard

Last paragraph

Canada would like to point out that, in certain situations, it may be important not only to gain information regarding the hazard and its human health effects, but also regarding the sampling and methods of analysis used by the competent authority to obtain test results. We recommend the following addition:

*“In each of the above cases, the specific hazard and its level or prevalence based on available information **and, as appropriate, the sampling and methods of analysis used** should be notified.”*

3. Identification of foods concerned

We recommend amending the third bullet as follows:

*“- lot identification, including lot code, **dates of production or processing**, and identification of premises...”*

ATTACHMENT 2

Principles

In the third bullet, the phrase “ensure the protection of consumer health” should be replaced by “protect the health of consumers”.

Scoping the problem and information gathering

In the 7th bullet, clarification is required as to what is meant by “trade data on the food hazard in the identified food commodities”.

Risk assessment phase

In the 3rd bullet, we recommend deleting the words “where relevant” as exposure assessment is not an option in the Codex definition of risk assessment.

EGYPT

Re-export of food subject to an emergency situation.

Point 22 (may be) to be changed to (should be)

Point 23 the affected food should not be re-exported to a third country.
The rest of the item should be deleted.

JAPAN

GENERAL COMMENT

The government of JAPAN believes that the Guidelines for Food Safety Emergency Situations Involving International Trade is very important and significant as the policy for member governments in order to protect the health of consumers in food safety emergency situations.

We would, therefore, like to express our appreciation to the government of Australia and expect that progress of this guideline.

Specific Comments

Paragraph 3

It says, “chemicals that are inherent in the food or that are produced through processing eg. acrylamide” as chemicals that induce food emergency. However, there are another chemicals that contaminate food from outside like heavy metal, radioactive nuclide, etc., so these chemicals should also be included.

It is not necessary to exemplify the chemicals that are produced through processing, because nitrosamine, histamine and lipoperoxide are known as chemicals produced through processing or storage. And it is not adequate to quote acrylamide as chemicals that induce food emergency. So I propose to delete the exemplification, “eg. acrylamide.”

Paragraph 23

Even if their appropriate level of protection is lower than in the importing country, the food which contain **critical risk of emergency** should not be re-exported to a third country. So the sentence “their appropriate level of protection is lower than in the importing country” should be deleted.

MEXICO

Mexico wishes to commend the work of the Drafting Group.

Throughout the text:

We suggest replacing the imperative “must” (“deberá”) with “should” (“debería”) so as to be in accordance with the recommendatory nature of the guidelines and to be consistent with the English version.

Paragraph 2.

We suggest establishing a clear definition of “food emergency” as it relates to food safety, emphasising that, generally, reference is made to health emergencies when there have been clinical cases related to the consumption of food or foods.

However, if the intention is to apply the Guidelines to cases in which a risk is identified, even when there have been no clinical cases (a situation better known as “food alert”), this must be made clear in the definition.

Paragraph 3.

The Guidelines can also apply where the importing country identifies a food emergency situation whose origin or possible origin is located in the exporting country, and which triggers the communication and management process of the health emergency.

It is vital to identify precisely the origin of the contamination in the risk evaluation process as, although the product involved in an emergency situation may be imported, the elements that caused the contamination could have originated in the importing country. In these situations, an inadequate management of risk communication could result in a negative impact on the image of the brand, company or country of origin of

the product. We suggest including these considerations in the Section: “Considerations relating to Food Safety Emergency Situations”.

Paragraph 6.

It is also possible that lack of information may result in inadequate communication of the situation by the importing country itself. The source of information for the exporter would then be anecdotal reports.

We suggest taking this possibility into consideration in this Section, so that both, the importing and exporting countries strive to obtain and exchange information through official channels.

Paragraph 7.

When we point out that risk management measures may be applied provisionally, we would like to emphasise that the decision making process must be objective and transparent and based on sound grounds.

Paragraph 8.

We suggest transferring this paragraph to the Section on “Communication of Information”.

It is important for governments to apply risk communication in an appropriate manner in order to avoid panic situations in the population. The competent authorities should appoint official spokespersons for these situations in order to provide timely and adequate information, not only to the population but to national and international bodies and the media.

Paragraph 12.

We suggest amending the text as follows: “...which contains imported ingredients, or when imported components have been used in food production (e.g. fodder for cattle), the source countries of these ingredients o components should also be notified if the health hazard is potentially associated with them. ~~those ingredients. Similarly....~~”

Heading above paragraph 15.

The Spanish version reads “Responsibilities of exporting countries” (“Responsabilidades de los países exportadores”); it should read “importing” (“...importadores”).

As part of the risk assessment process, the importing country should consider the possibility that the source of contamination could have originated in its territory, in order to carry out the relevant investigations, and to avoid the application of inappropriate and unjustified management measures.

It must be considered that in order to trigger a response to a food emergency situation in the exporting country, it is necessary for the importer to ensure that the source of contamination is indeed in the exporting country; otherwise the situation becomes a domestic problem outside of the scope of these Guidelines.

Paragraph 20.

We suggest amending the paragraph as follows: “...In these cases the food control authority should ~~take into account~~ (controlar) consider whether the food has beendistributed...”

Paragraph 23.

We suggest amending the paragraph as follows: “... Consent to receive the affected food may be granted by a third country where, for example ~~their appropriate level of protection is lower than in the importing country, or where the third country~~ it intends to apply a treatment that will render the food safe”.

The above amendment considers that a lower ALOP in certain countries does not necessarily result from the application of risk analysis or from the existence of a population less susceptible to adverse health effects caused by contact with specific hazards.

The country may not have an adequate infrastructure to assess the risk or its regulatory and prescriptive framework may not cover specific hazards.

In these cases, we suggest taking into account the scientific evidence concerning the risk to the health of the population posed by identified hazards, regardless of the ALOP established by a country, pursuant to the

Codex Code of Ethics for International Trade in Food (CAC/RCP 20-1979 Rev. 1 – 1985, paragraph 4.2a), referred in footnote 5 of this Proposed Draft Guidelines.

Paragraph 26.

Appendix 1 does not contain a prescriptive format, but a list of the information deemed convenient to include in an information exchange standard format. We therefore suggest that reference be made in this paragraph to that effect.

Paragraph 27.

We suggest including that consideration should be given to clear and converging evidence concerning the origin of the contamination of the product(s) involved.

Paragraph 28.

We suggest considering the possibility that the affected foods may not be fully identified, but that there is a clear association between “food possibly affected” and adverse health effects.

We also suggest that the information process should include the place or places of acquisition and/or consumption of the products.

We suggest amending the term “format”.

Paragraph 29.

We recommend dividing the first bullet point as follows:

- Procedures applied to identify the product or products
- Measures taken to prevent the sale...

Appendix 1

Rather than a prescribed format, the Appendix contains a list of the information to be included in a standard format for information exchange in food emergency situations. We consider the list adequate.

We suggest therefore amending the title of the Appendix.

Paragraph 2, Appendix 1.

We suggest replacing the term “...of concern” (“inquietante”) in the first and third dot points with “in question” (“en cuestión”) as it is more appropriate.

We suggest replacing “foreign” (“foráneos”) in dot point 5 with “foreign” (“extraños”). Translator’s note: This applies only to the Spanish version.

In the last sentence of the paragraph, delete the expression “ above” (“más arriba”) and replace with “above-mentioned” (“antes mencionados”).

Paragraph 3 del Appendix 1.

First dot point, replace “degree”(“grado”) with “category”(“categoría”), and replace the text between brackets “ e.g.” (“es decir”) with “i.e” (“p.ej.”).

In the second dot point replace “package(s)” (“paquete o paquetes”) with “packing” (“envases”). Include the meaning in full of the acronym CUP (in English UPC).

Appendix 2.

We recommend numbering the paragraphs of the Appendix.

Principles

In the second dot point, we suggest replacing “provisionally” (“provisoriamente”) with “provisionally” (“provisionalmente”). Translator’s note: this applies only to the Spanish version.

Mention should be made that measures applied provisionally should be based on evidence and that the decision making process should be objective and transparent.

In the third dot point, we suggest replacing the term “disruptions” (“las interrupciones”) with “obstacles” (“los obstáculos”).

In the last dot point, emphasis should be given to the importance of identifying possible errors in the application of the control measures, both in the exporting and importing country’s inspection and certification systems in order to avoid possible future emergency situations.

Replace “planning for possible future emergencies” (“al planeamiento de posibles emergencias futuras”) with “planning for possible future emergencies” (“a la planeación de la atención de posibles emergencias futuras.”) Translator’s note: This applies only to the Spanish version.

Phases involved in a...plan

Under a) replace “gathering” (“recabado”) with “gathering” (“recopilación”). Translator’s note: This applies only to the Spanish version.

Scoping the problem...

Replace “gathering” (“recabado”) with “gathering” (“recopilación”). Translator’s note: This applies only to the Spanish version.

In the first dot point, replace “precipitating”(“precipita(n)”) with “originating” (“origina(n)”).

In the second and seventh dot points, replace “gathering” (“recabado”) with “gathering” (“recopilación”). Translator’s note: This applies only to the Spanish version.

Amend the second dot point as follows: “...including contacting the exporting or importing country as appropriate” (“...incluso contacto con el país exportador o importador, según corresponda;”)

In the third dot point, insert at the end of the text “.... or probably affected” (“...o probablemente afectados;”)

Risk assessment phase

First dot point: add confirmation of identification of the source of contamination.

In the third and fourth dot points, replace “exposure assessment” (“evaluación del contacto”) with “exposure assessment” (“evaluación de la exposición”). Translator’s note: This applies only to the Spanish version.

In the last paragraph, it should be pointed out that the decision making process for the application of provisional measures should be objective and transparent and based on sound grounds.

Risk management phase

In the first dot point, delete the expression “ above” (“más arriba”) and replace with “above-mentioned”(“antes mencionados”).

We suggest replacing “provisionally” (“provisoriamente”) with “provisionally” (“provisionalmente”). Translator’s note: this applies only to the Spanish version.

In the last paragraph, it should be pointed out that the decision making process for the application of provisional measures should be objective and transparent and based on sound grounds.

Implementation and review phase

Since this is a model plan for food emergencies, we recommend including in the first dot point the main group of applicable measures in paragraph 4, Appendix I:

Measures taken to identify and prevent the sale and export of the food

Measures taken at source

Measures taken to recall food from markets

Measures taken regarding final disposition

In the last dot point we suggest including the identification of possible errors in the control systems of the importing and exporting countries in order to prevent future emergencies.

We suggest adding a dot point indicating the notification of the end of the emergency.

NEW ZEALAND

The New Zealand Government would like to make the following comments:

“*Health hazard*” appears many times throughout the document. The document is about food safety therefore we suggest “*health hazard*” is replaced by “*food safety hazard*”, and consequential changes are made to the rest of the text. This change more accurately reflects the intent of the document.

Paragraph 2

Examples of food safety hazards should cover biological chemical “*and physical*”. Consequential changes should be made to the rest of the text. The suggested change aligns with the accepted Codex definition for “*hazard*”.

Paragraph 5

We suggest changing the word “*inform*”, in the first sentence, to “*assist*” to improve readability.

Paragraph 6

We suggest the word “*truly*”, in the third sentence, is deleted before “*risk-based*”, it is unnecessary wording. We also suggest “*evidence-approach*” be changed to “*evidence-based approach*”.

Paragraph 7

It is not clear, exactly what the 2nd sentence is trying to say – what does “*using the best judgement of trained and experienced food control officials*” mean? Such terminology is ambiguous and open to differing interpretations. New Zealand would propose a re-write of paragraph 6 as follows:

In cases where there is a lack of information and significant scientific uncertainty in the risk assessment of food emergency situations, risk management measures may be applied provisionally. “*Risk analysis principles should be applied, to the extent possible given the particular circumstances, when making provisional risk management decisions.*” Countries need to ensure that provisional risk management measures are adjusted, in a timely manner, in the light of new information.

Paragraph 8

This section is headed “*The application of risk analysis to food emergency situations and information exchange*” and needs to focus on making transparent risk analysis decisions. Therefore we believe the comment in this paragraph is in the wrong place and should be moved and inserted after paragraph 9. Paragraph 8 should be reworded as follows:

“Countries should be able to demonstrate the risk analysis process that they applied to the food emergency situations.”

Paragraph 9

We suggest adding “*,where necessary,*” before “*removed from the market*” in the third sentence.

Insert current paragraph 8 after paragraph 9.

Paragraph 10

We suggest that this paragraph is too detailed and should be deleted and replaced with the following:

“On a bilateral basis the best method of communication in a food emergency situation can be mutually established and documented between importing and exporting countries. In the absence of an agreed procedure the exporting country should use a combination of methods, e.g. phone, fax, email, consular office, to ensure contact is made with the importing country in a timely manner.”

Paragraph 12

We suggest changing “*feed items*” to “*feedstuffs*” where it occurs in this paragraph.

New Zealand also suggests changing “*food control authorities*” to “*competent authority*”. This maintains a consistent approach to that taken in other CCFICS text. Consequential changes to the remainder of the document should be made where this term is used.

Paragraphs 13 & 16

We suggest that “*the situation develops and*” is deleted and the sentence read “*...as and when more detailed information becomes available*” in both paragraph 13 and 16. It is not necessary for the situation to develop before more detailed information can become available.

Paragraph 25

This paragraph does not really give enough information to be of assistance to member countries. New Zealand suggests that it should either be expanded to give specific information or be deleted.

Paragraph 27

In the second sentence do we mean “*source of the food safety hazard*”, i.e. “*If possible, the source of the food safety hazard should be identified*”?

We suggest changing “*agent causing the effects*” to “*hazard*”.

Paragraph 29

In the first sentence we suggest “*and eliminate*” is changed to “*or eliminate*”.

Attachment 1

Section 3 should also make reference to the number or unique identifier of any phytosanitary or sanitary certificate. This can help to identify the particular product or shipment and in the case of a shipment that is still ‘on the water’ withdrawal of the official certificate will prevent the product from entering the importing country.

Section 4 has been written as if the problems are only detected in the exporting country and the guideline should be universal for advice from the exporter to the importing country as well as from the importing country back to the exporting country. We suggest that the sub-heading for Section 4 be amended to read “*Action taken by exporting / importing country*”.

UNITED STATES**GENERAL COMMENTS**

The United States appreciates the work of Australia and the Drafting Group in preparing this Discussion Paper.

The United States supports the development of this revision and expansion of the existing *Codex Guidelines for the Exchange of Information in Food Control Emergency Situations*. The United States notes that food-related emergency situations associated with terrorism is a subject of interest and the Committee may wish to consider this area as the revision of these Guidelines is progressed.

SPECIFIC COMMENTS

The following specific comments are provided.

Scope

Paragraph 2. First sentence. Change “*potential risk*” to “*clearly identified potential risk based on science.*” When dealing with potential risk, such situations should be both clearly identified and have a clear scientific basis for concern.

Paragraph 3. The United States suggests deleting this paragraph. We believe the first sentence is self-evident and therefore is unneeded while the balance of the paragraph presents unnecessary detail that is, as appropriate, already covered in the first paragraph of the scope.

Considerations Relating to Food Safety Emergency Situations

Paragraph 4. Delete the last sentence of the paragraph as it goes into unnecessary detail as to the nature of a food emergency situation.

Paragraph 6. We suggest adding the words “*unavailability or*” before “*lack of timely provision of*” in the first sentence. We further suggest that the third sentence become the second sentence and begin with “*Lack of reliable data can make.*” The current second sentence would move to the end of the paragraph and be revised as follows to reflect the need to verify the accuracy of anecdotal reports.

“When information on food safety emergency situations is obtained from anecdotal reports, such as reports from the media and reports from third countries, the accuracy of such reports should be verified before taking risk management measures.”

Paragraph 7. Add the following phrase to the end of the first sentence to clarify that there is a need to obtain substantiating information: “*while additional substantiating information is sought.*” Additionally, with respect to the second sentence, add the words “*scientifically-based*” before “*risk analysis principles*”, delete “*to the extent possible*”, and insert the word “*scientific*” in front of “*judgment*”. The second sentence would then read:

Recognizing the need to apply scientifically-based risk analysis principles, provisional risk management decisions in these circumstances will need to be made using the best scientific judgment of trained and experienced food control officials.”

Paragraph 8. This sentence deals with communication and should be moved down to become the first sentence of the sub-section on “Communication of information.”

Paragraph 10. We suggest rewording the first sentence as follows to clarify the need for expedient communication and to simplify the statement.

“In the event of a food safety emergency situation, communication should be made by the most expedient means, as early as possible and with verification of receipt by key parties. Communication by telephone, e-mail, facsimile, and regular mail should all be considered to achieve early communication and to assure that the message is received.”

Paragraph 11. The United States would inquire as to whether there is an international organization who might be appropriate for maintenance of food emergency contact point information, recognizing Australia’s gracious offer.

Paragraph 12. Insert the words “*as appropriate*”, after “*ingredients should*”. There may be instances where notification of countries that are the source of ingredients is not needed, for example, in the case of an undeclared allergen.

Paragraph 14. Revise sentence 2 to read “*This communication should be promptly followed up with supporting documentation...*”. It is usually not essential that documentation accompany communication of a food safety emergency situation.

Paragraph 17. In the second sentence delete “*to the extent possible.*” The principles of risk analysis should apply.

Paragraph 18. Insert the words “*nature of the emergency*” before “*the level of distribution.*” The nature of the emergency must be taken into account.

Paragraph 23. We see no need for the second sentence and recommend its deletion.

Paragraph 31. The United States would note that while the paragraph states that “The plan needs to recognize that each food safety emergency is different and should therefore provide flexibility to respond to each situation on a case-by-case basis,” the plan itself (Annex 2) does recognize differences. The case-by-case nature and the need for flexibility should, we suggest, be mentioned in the “Model Food Safety Emergency Plan.”

Standard Format for Information Exchange in Food Safety Emergency Situations

Paragraph 26. Delete the word “*also*” before “*available.*”

Attachment 1- Standard Format for Information Exchange in Food Safety Emergency Situations

Item 2. Revise the lead-in sentence to read “*The nature of the health hazard should be described, as appropriate, according the list below.*” Additionally, we would note that the presence of an allergen is not a hazard except to sensitive individuals and the wording for this dash point should be “*undeclared allergen*”.

Item 3. Revise the lead-in sentence to read “*The foods concerned should be described as completely as possible. The following information should be provided if available and as appropriate to the product.*” With this change, two additional dash points, as follows, can be added and the last two sentences deleted.

- *pictorial image.*
- *Countries of destination.*

Item 4. It would appear that the examples given in parenthesis are included or could be included in the dash points. We suggest rewriting this section as follows:

“*Information on action taken, such as:*

- *measures taken to identify the food and/or packaging;*
- *measures taken to prevent the sale and export of the food;*
- *measures taken at the source, to prevent problems;*
- *measures taken to recall food from markets;*
- *measures taken regarding final deposition (e.g., destruction of the food);*

Attachment 2- Model Food Safety Emergency Plan

Principles

The United States notes that redrafting is needed to convert some of the bullet points into principles. Specifically: in bullet point 4, change “is” to “should be”; in bullet 5, insert “There should be” in front of “Full;” and redraft the last bullet point to read “Response measures should be reviewed to assist with planning for possible future emergencies.”

Additionally, in bullet 2, delete “in a flexible.” It is unclear what is meant by flexible.

Phases Involved in a Model Food Safety Emergency Plan

We suggest reversing the order of bullets 2 and 3.