

C O D E X A L I M E N T A R I U S C O M M I S S I O N



Food and Agriculture
Organization of
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World Health
Organization

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Agenda Item 4

CX/FICS 11/19/3 Add 2

Original Language

October 2011

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

Nineteenth Session

Cairns, Australia 17 – 21 October 2011

PROPOSED DRAFT PRINCIPLES AND GUIDELINES FOR NATIONAL FOOD CONTROL SYSTEMS

(N06-2009)

(Comments at Step 3)

(Honduras, Jamaica, Mali, Tanzania)

HONDURAS

Anteproyecto de principios y directrices para los sistemas nacionales de control de los alimentos

Que se incorporen las observaciones realizados por el grupo de trabajo presencial y continuar con el trámite correspondiente ante la CAC.

Integrarse a la discusión del CCFICS en la 19ª reunión del Comité, para revisar las observaciones y considerar su incorporación al documento.

JAMAICA

General Comments:

Jamaica congratulates Australia for leading the initial work in developing the proposed Draft Principles and Guidelines for the National Food Control Systems and also for its leadership of the physical working group (March 2011), for the stellar work done in developing this current draft.

Jamaica recognizes however that whilst this is a good document providing the broad framework and high level principles necessary to guide countries in developing their National Food Control System there are still some areas of concern.

One area of concern is the presentation of some information twice in the document under the same sub-head, almost verbatim, with such repetition in some instances adding no real value to the document. We are not quite sure why this is so but Jamaica recommends that a structure be developed to reduce the duplication where this is found to be immaterial for a more user friendly document.

For example:

- Assessment & Evaluation page# 10, between # 44 & # 45, repeated on page # 14, between #77 and # 78
- Compliance & Enforcement page # 10, between #47 & #48, repeated on page # 14, between # 81 & #82
- 4.2.2 Communication (including stakeholder...), page #12 between # 61 & #65 repeated on page #16 at 4.3.2 between #99 & #100

We believe a structure could be developed where a sub-head has represented all pertinent elements, (where applicable) related to that sub-head.

For example:

When addressing the sub-head “Training” all information related to this component should be in one section of the document just structured to represent all the different elements that should be provided for in a national food control system. Likewise if addressing “Surveillance, Investigation, Response keep it all together.

An example of what we recommended for “ Surveillance, Investigation ,Response- Here Jamaica proposes a compression of both areas represented on pages 12 & 16, paragraphs # 59 , #60 , # 97, # 98, #99 followed by # 61 in this order, deleting the opening sentence (Capability.... Injury) of Surveillance, Investigation, Response on page # 16.

With regards to paragraph #57 whilst we agree that ongoing training is a necessity, a structured training plan to which there is full adherence could pose some challenges for some developing countries given the possible resource constraints. With such position stated it is hoped that the assessment and evaluation of a national food control system will not be compromised/negatively impacted by the inability to do so.

With regards to paragraph #67 Jamaica believes the use of the word “enact” may be subjected to different interpretations and therefore recommends that this paragraph could be made clearer.

Specific Comments

PRINCIPLE 7 COOPERATION AND COORDINATION BETWEEN MULTIPLE COMPETENT AUTHORITIES

17. The competent authorities within a national food control system should operate in a cooperative and coordinated manner, within clearly assigned responsibilities, for the most effective use of resources in order to avoid duplication/gaps, **where possible**, and to facilitate information exchange.

Rationale: It is difficult to absolutely avoid duplication and gaps in certain circumstances.

PRINCIPLE 9 SELF ASSESSMENT AND REVIEW PROCEDURES TO ENSURE IT MAINTAINS ITS FITNESS FOR PURPOSE

19. The national food control system should possess the capacity to undergo continuous **assessment** and improvement and include mechanisms to evaluate its effectiveness **at periodic intervals/as deemed necessary.**

Rationale: Continuous assessment would facilitate the continuous improvement. There can be no continuous improvement without assessment as they both go hand in hand.

Periodic interval could be a designated one, fixed by the national government and their competent authority, whereas “deemed necessary” would allow flexibility and proactivity enabling response to environmental or any other change.

SECTION 4.1 SYSTEM CHARACTERISTICS

~~30. Pro-activity means that a national food control system is capable of identifying existing or emerging hazards in the environment before they materialise as risks in the food production/processing chain and at the early stages rather than in the end product. Trends and changes in the production/processing methods should also be subject to monitoring to allow early detection of emerging risks. Early warning/rapid alert systems, traceability and contingency planning for managing and preparing for potential food safety incidents should be an inherent part of a pro-active control system. [EU/US leave in/Brazil Australia delete]~~

Rationale: Proactivity as posited gives the latitude for too much subjectivity, and lends itself possibly at the extreme, to be used arbitrarily. Proactivity should be based on empirical evidence and sound science. Jamaica therefore supports Brazil and Australia in deleting this item from the document.

Legislation

38. Legislation should provide clarity as to the roles and responsibilities of participants in the food chain, in particular that of central government, the competent authority (or of each competent authority where there is more than one) and any authorised providers (where these are used), and industry. Legislation should set out the overarching objectives of the national food control system and any specific or lower objectives that relate to participants or sectors. It should provide the authority or basis for the setting of standards and

establishment of appropriate controls at all stages of the food chain, including production (**to include primary production**), manufacture, importation, processing, storage, transportation, distribution and trade.

Rationale: Production is a broad term and may not necessarily be interpreted to include the primary production stage hence the need for it to be explicitly stated.

Page 9, between # 38 & 39-**Control Programmes Inspection**—~~Inspection~~ [Australia] Control Programme(s) should provide ongoing monitoring of the food control system from production through manufacturing, **storage**, to transportation ~~+~~ **and** distribution.

[Uruguay proposed to delete transportation/distribution and replace with retail]

Rationale: The steps we included (storage, separation of transportation and distribution) are critical components in the food chain in terms of guaranteeing safe food and therefore should not be interchangeable or combined in all circumstances.

Page 10, between # 44 & 45-**Assessment and Evaluation** – As appropriate, assessment, audits, inspections or other tools to evaluate the effectiveness of the food control programme, including the recognition of trends, **should be used when reviewing the National Food Control System**.

Rationale: The statement added is just a more explicit way of indicating the relevance of Assessment & Evaluation to the nation food control system.

45. **A national food control** The system design should provide for the capability to evaluate the effectiveness of control programmes ~~the national food control system~~, including ongoing data collection **and should have mechanisms in place to** [Aus]:

- Continuously update ,review,analyze **and evaluate control programmes**
- Adopt to changes in the production environment
- Respond and intervene where / as required in the national food control system
- Ensure the protection of health of consumers and ensure ~~of~~ fair practices in trade

~~46 A national food control system should have mechanisms in place to continuously update, review and analyse the above mentioned information. A national food control system should also have mechanisms to adapt to changes in the production environment, and respond and intervene where/as required in the national food control system to ensure the protection of health of onsumers and ensure of fair practices in trade. [Japan] [covers US proposal]~~

Rationale: Jamaica has merged paragraphs # 45 & 46 as indicated above to reduce the repetitive use of national food control systems in the two paragraphs as well as reduce some amount of overlaps while still representing all the elements in # 45 & 46.

48. Compliance and enforcement programmes should be designed to ~~provide for the ability for~~ **allow** the competent authority to take **the required/ appropriate** action to ensure the situation is remedied where a product or process is found not to be in conformity. The resulting actions should take into account any repeated non-conformity of the same Product or process to ensure that any action is proportionate to the degree of public health risk, potential Fraud or deception of consumers. [Australia/also picks up some of the EU thoughts]

Rationale: editorial changes

MALI

Observations générales :

Le Mali souhaite réitérer ses félicitations au groupe de travail physique, présidé par l’Australie pour la préparation du document de travail. Il soutient la progression de l’Avant-projet à l’étape suivante de la procédure.

Observations spécifiques

Section1 Introduction : 2^{ème} paragraphe, 1^{ère} ligne : Reformuler la phrase comme suit « Alors que les Principes et Directives pour les systèmes nationaux de contrôle des aliments visent la production,

l'entreposage, la distribution d'aliments et les activités au niveau des postes de contrôle frontaliers,..... » ;

Principe 8 : Titre : Ecrire : « MESURE DE PREVENTION ET D'INTERVENTION » ;

Section 4.1, paragraphe 31 : Biffer « ~~une capacité d'apprentissage~~ » et enlever les crochets de « **Amélioration continue** » ;

Section 4.2 :

Paragraphe 43, dernier boulet : ajouter « formation du personnel » ;

paragraphe 47 : Biffer « ~~conformité et obligation d'application~~ » et écrire « **correction et mesure corrective** » pour être conforme avec le contenu du texte et remplacer partout dans le document « ~~obligation d'application~~ » par « **mesure corrective** » ;

4.2.1 : titre : Biffer les mots entre parenthèse (~~COMPREND LES LABORATOIRES, LE PERSONNEL, LA FORMATION, ETC.~~);

Paragraphe 52 :

- **1^{ère} ligne :** Ecrire au lieu place de « ~~aliments~~ » « **denrées alimentaires** » pour être cohérent avec la terminologie utilisée dans le document ;
- **3^{ème} ligne :** Ecrire au lieu et place de « ~~microbiologique~~ » « **biologique** » ;

4.2.2

- **Biffer le titre :** 4.2.2 « ~~Communication (comprend l'implication des parties prenantes, l'éducation et la communication internationale)~~ » car ce point ne traite pas seulement de la communication ;
- Intervertir les points « **éducation** » et « **communication internationale** »

section 4.3, législation :

- **Titre :** Compléter le titre « législation et application des mesures » ;
- **Point Conformité et obligation d'application :** Changer le titre de ce point, « ~~Conformité et obligation d'application~~ » par « **Surveillance de conformité** ».

TANZANIA

Section 3: Principes

Principe 2: We propose revising this by deleting the examples of entire food chain: “including feed, primary production and harvest, processing, storage, distribution, transport, retail, import and export”.

We propose introduction of “**New Principle 11: Adequate Means and Resources**”

Para 21: National food control systems should have sufficient resources, including facilities, personnel and funding to carry out their resources.

Section 4: Framework for the Design and Operation of the National Food Control System:

We propose to delete paragraph 25 because there is repetition of issues in paragraph 27

We propose inclusion of references to CCFICS documents on equivalence that is CAC/GL 34 and CAC/GL 53 in Paragraph 26.

Section 4.1 System Characteristics

We propose this to be a stand-alone section.

Section 4.2: System Design

Paragraph 38: Legislation - we propose revision of this paragraph by deleting the examples of the stages of a food chain as mentioned in **principle 2**