

codex alimentarius commission

FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD HEALTH
ORGANIZATION

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Agenda Item 4

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Eighth Session

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PROPOSED DRAFT GUIDELINES AND CRITERIA FOR OFFICIAL CERTIFICATE FORMATS AND RULES RELATING TO THE PRODUCTION AND ISSUANCE OF CERTIFICATES

Government Comments at Step 3

Canada

Canada is pleased to offer the following comments on the *Proposed Draft Guidelines and Criteria for Official Certificate Formats and Rules Relating to the Production and Issuance of Certificates*, CX/FICS 00/4

Paragraphs 4 and 13

The document envisages the possible usage of electronic forms of certification (as noted in paragraph 4), but still indicates the need for an official hard copy to be made available on request (as noted in paragraph 26). The Committee may wish to discuss whether electronic certification is, or may become, feasible as a stand alone option. This would likely require modifications to the CRITERIA section since several of the requirements may not be applicable, as written, for electronic certificates (e.g., signatures, seals, identification of originals and copies, etc..).

Paragraph 5

This paragraph makes reference to a “declaration by the official” and also requires that the official certificate be “sealed” by an officer. These expressions are not used elsewhere in the document nor are they explained. Is the “declaration” synonymous with the “health attestation” noted in paragraph 17 or is it a signed statement attesting to the accuracy of the information presented in the certificate? Is the “seal” synonymous with the “official stamp” noted in paragraph 27? We suggest to clarify this paragraph to ensure consistency in the document.

Paragraph 7

Where an official certificate consists of two or more separate sheets, we suggest that each sheet be separately initialled by the certifying officer, be numbered so as to indicate it is a particular page in a finite sequence and contain the unique identification number for that certificate.

Paragraphs 7 and 8

For consistency throughout the document, we suggest to use the term “certificate(s)” in lieu of “form(s)”.

Paragraph 11

By themselves, the terms “ORIGINAL” or “COPY” do not indicate the intended recipient. We suggest to identify the recipient on the certificate; for example: “ORIGINAL: TO (name of recipient)” or “COPY: TO (name of recipient)”.

An analysis of the document indicates at least five printed copies may be required:

- certifying authority (para. 11)
- competent authorities in exporting country (para 26)
- competent authorities in importing country (para 26)
- exporter, since he/she gives up the original to the importer (paras. 25 and 24)
- importer, if he/she yields the original to the importing authorities (para 24)

The number of printed copies raises the concern regarding the legibility of the copies, particularly the lower ones in a multi-set.

Paragraph 14

Under the third bullet, we suggest to include the lot identifier or date coding for the individual product containers as well as the outer cartons if the identifier/codes are different. As well, if the consignment is made up of different codes of the product being certified, the relative amount of each code should be provided.

Paragraph 22

Under the sixth bullet, “certifying in respect of circumstances known at the time of signing the document” should be clarified to clearly indicate that the circumstances are those that were in place at the time of production of the consignment being certified.

Paragraph 26

To clearly indicate that the copy of the certificate provided to the competent authorities is NOT a photocopy, we suggest to add the word “printed” before “copy”; i.e., A *printed copy of the certificate (clearly marked “COPY” or “DUPLICATE”)* This relates back to paragraph 11 where it is required that the certificate be printed with the required number of copies.

Paragraph 27

Under bullet 2, if alterations are made to information on the certificate, the original information should be crossed out with a single line so that it can still be deciphered.

Under bullet 5, a date format should be specified on the certificate to avoid confusion if a date numbering system is used (ie., day/month/year versus month/day/year).

Paragraph 28

We suggest that the duplicate certificate have a field where the certifying officer records the unique identifying number of the original certificate which is being replaced.

India

Under Section on Criteria in para 12 the Committee expressed that the text given in the first bracket may be deleted since the chances of misusing the same are more.

Under Section on Details of the Consignment - in para 14 the following points may also be added in terms of the minimum information required to be given in the certificate:

- Date of manufacture
- Date of best before usage
- Storage requirement if any