



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON SPICES AND CULINARY HERBS**

First Session

Kochi, India, 11-14 February 2014

COMMENTS ON MECHANISMS FOR PRIORITIZATION OF NEW WORK

The following comments have been received from the following Codex members and observers

Canada, Egypt, Republic of Korea, United States of America and IOSTA

CANADA

GENERAL COMMENTS

Canada thanks India for preparing the paper on Mechanisms for prioritization of work. We support defining the criteria by which new work is prioritized and the use of criteria which align with the Codex Alimentarius Commission Procedural Manual – i.e. the Criteria for the establishment of work priorities.

As noted in Paragraph 155 of the last Codex Commission report and in the supporting Discussion Paper CX/CAC 13/36/10-Add.2, (Paragraph 43), the mandate of CCSC is to develop worldwide standards defining primarily “quality characteristics” to promote fair practices in the food trade. Given this mandate, we have questions regarding some criteria and/or their proposed weighing in our specific comments.

SPECIFIC COMMENTS

Canada recognizes the importance for Codex to address the human health concerns linked to spices and culinary herbs. We note in particular the work of the Codex Committee on Food Hygiene (CCFH) which has recently completed important work linked to the microbiological safety of spices. However, we have questions regarding Criteria B1. “Extent of impact on consumer health”. As per Paragraph 43 of the Discussion Paper for the Establishment of Codex Committee on Spices, Aromatic Herbs and their Formulations (CX/CAC 13/36/10-Add.2), the CCSC mandate is to develop worldwide standards to define “quality characteristics”, so as to ensure fair trade practices in the food trade. Hence, we seek clarification regarding the relevance and/or the weighing given to this criterion related to human health. It is our understanding that should matters related to human health concerns be raised in CCSC, they will be referred to and addressed in the relevant subject matter Codex Committees (e.g. CCCF, CCPR, CCFH).

Canada has noted the reference to intra-regional trade (Criteria A1). CCSC standards will have an application on a worldwide basis, hence why we question the relevance of intra-regional trade as a factor for CCSC. In our view, the inter-regional trade (Criteria A2) is the relevant factor in the context of developing worldwide standards.

Canada would support an amendment of criteria D3 to include barriers to trade due to a lack of an applicable standard or due to the presence of standards which may require amendment. We would also support an increase in the weight provided to this criteria.

Canada supports the inclusion of additional information with the criteria identified in Table 1 to guide their application. We would also support additional elaboration in the scoring of the criteria provided in Table 1, for example Criteria D1 - whether a high or low score would be used when an existing international standard is available.

As noted in Canada’s comments on Agenda item 4, we support the use of a physical working group to prioritize new work proposals and support the use of an electronic means to exchange relevant information/data between sessions to increase the efficiency of the physical working group deliberations.

EGYPT

Referring to your document CX/SCH 14/01/5 concerning “Mechanisms for prioritization of the work” enquiring about EOS comments on this document. I would like to inform you that EOS approves to the above-mentioned document.

REPUBLIC OF KOREA

Republic of Korea is pleased to provide the following comments on Mechanisms for prioritization of the work.

In the principle of prioritization for JMPR and JECFA, the scoring and weighting are not considered. But in this field, the mechanism of scoring for prioritization has been selected. Therefore, it is required to clarify the reason why this new method has been adopted.

Republic of Korea believes that the international food standards setting is to produce and trade the food in safe way, and accordingly the most important parameter is to protect the health of consumers. However, in this agenda, “Volume of production and trade(40%)” has been given more average weighting than “Consumer Protection(25%)”. Therefore, we ask for reasonable explanation on this decision.

Republic of Korea considers that “Requirement for risk analysis” in “Need for scientific advices” is similar to “Extent of impact on consumer health” in “Consumer Protection”. Therefore, we need the explanation why “Need for scientific advice” criteria is separately required.

Republic of Korea also ask for reasonable explanation why “Intended use of the commodity’ has been selected as a parameter for prioritization of the work.

UNITED STATES OF AMERICA

The United States welcomes the opportunity to submit comments on the Codex Committee on Spices and Culinary Herbs (CCSCH) documents’ CX/SCH 14/1/5 *Mechanisms for Prioritization of Work*. We would like to congratulate the government of India on the formation of the committee and look forward to working closely with all of the members of the CCSCH to ensure its success.

General Comments:

The United States supports the efforts and activities of the Codex Committee on Spices and Culinary Herbs (CCSCH) in developing standards to promote fair trade practices and protect consumers. The United States believes that CCSCH, guided by the Statutes of the Codex Alimentarius Commission and the Terms of Reference (TOR) developed for it, will make a valuable contribution to Codex and consumers around the world.

The Committee is commended for promoting existing Codex mechanisms for organizing its work. The United States believes that this will promote consistency with other Codex activities. In particular, reaching agreement on “criteria to score and rank commodities” (CX/SCH 14/01/5, Table 1) will assist the Committee in prioritizing its standards development responsibilities.

Specific Comments:

The U.S. comments below follow the numerical (paragraph number) and heading sequences found in documents CX/SCH 14/01/5.

Paragraph 6: Proposed physical working group on prioritization of work proposals.

Comment: The United States supports the formation of a “priority working group” that would physically meet to prioritize the work proposals submitted to the CCSCH. The United States recommends that all proposals for consideration by the priority working group be circulated well in advance of the physical working group meeting. This would allow the Codex Secretariat sufficient time to circulate the proposals in English, Spanish, French and Arabic, and provide members the opportunity to evaluate each proposal in advance of the prioritization working group meeting.

Paragraph 10: Conclusion - Recommendation that the Codex Committee on Spices and Culinary Herbs consider prioritization system in its 1st Session.

Comment: The United States endorses the recommendation that the CCSCH consider, at its 1st Session, the proposal to follow the proposed prioritization system to rank new work proposals, outlined in document CX/SCH 14/01/5. In particular, we look forward to discussion with other members of the proposed criteria and weights in Table 1 and their applicability to commodity standards to be developed by CCSCH.

Again, we appreciate the opportunity to provide these initial comments and look forward to working with our Codex colleagues on the new CCSCH.

IOSTA (International Organisation of Spice Trade Associations)

Thank you for the opportunity to comment on the draft mechanisms for prioritization of the work (agenda item 5 of the first session of the Codex Committee on Spices and Culinary Herbs.).

Mechanisms for Prioritization of the Work

- Volume of production: while this will have some relevance in separating four to five items with very large volume from the remainder of the spices, its significance beyond that may not be as important.
- Extent of impact on consumer health: Quality parameters should have very little if any impact on consumer health and make the relevance of this criteria questionable.
- Intended use of commodity – whole, crushed or ground: IOSTA does not believe the intended use is relevant.
- Rejections in the international market due to lack of standards: there would be no rejections in the U.S. market based on quality. All rejections would be due to issues on regulatory compliance such as contamination from *Salmonella* or because of a violation of pesticide residue tolerances.