



**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 THE WORK

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

Argentina, Brazil, Costa Rica, European Union, Iran, Japan, Kenya

ARGENTINA

- Ponderación de los Criterios utilizados para puntuación – Puntos 3, 4 y 5 .

Argentina no tiene claro cual sería el efecto de ponderar los criterios para la priorización de los trabajos, por tal razón tampoco podemos definir si es un método justo o conveniente y que cubra las mayores expectativas de los Miembros y observadores del Codex interesados en la labor del Comité. Atento a ello se sugiere no incluir en esta instancia la ponderación y elaborar ejemplos en los que el objeto de la solicitud tengan ponderaciones diferentes.

Se sugiere remitirse en esta instancia específicamente a lo ya regulado en las “Directrices sobre la aplicación de los criterios para el establecimiento de las prioridades de los trabajos aplicables a los productos”, definidas en el “Manual de procedimiento del CODEX”.

Cuadro 1: Criterios para puntuar y clasificar los productos. Por otra parte nos confunde que en este comité se incluya un punto B.1 en el que se incluye el “alcance de sus efectos en la salud de los consumidores”

El punto referido a la “Protección del consumidor”, refiere en el documento de “Directrices sobre la aplicación de los criterios para el establecimiento de las prioridades de los trabajos aplicables a los productos” del CODEX, a evitar solapamientos de normas y no al impacto en la salud humana o las prácticas fraudulentas. Dicho parámetro se ha utilizado para priorizar temas en el Comité de Higiene de CODEX.

- Grupos de trabajo. Punto 6.

Argentina considera que no es necesario incluir un párrafo en relación con los grupos de trabajo, ya que queda claro que el Comité como todo órgano auxiliar del Codex puede promoverlos.

Creemos que es prematuro definir la necesidad de la creación de un grupo de trabajo con presencia física en esta instancia. Por otra parte no queda claro a que expertos en materia de hierbas y aromáticas se refiere, ya que los Miembros tienen la potestad de hacer participar a sus expertos y los observadores también, sin necesidad de que esta mención sea incluida expresamente en el punto 6. O se refiere a otros expertos?

BRAZIL

In regard to the aforementioned document Brazil would like to congratulate India for the effort and to share some general and specific comments and suggestions as follows:

General Comments:

Along the document the terminology “prevalent fraudulent practices” or simply “fraudulent practices” may lead to wrong assumptions and not fully encompass other situations such as poor management due to lack of Good Practices, as well as casual and/or systemic errors along the food chain. In that sense adopting a broad language would be preferable, such as “quality improvement need due to lack of GAP or GMP” and/or “general quality improvement need”.

To enhance comprehension and adoption of the document we would suggest the creation of a small

description of each Criteria that had been proposed.

Finally, the average weighting whilst prioritizing trade maybe not fully aligned with the Procedural Manual. Being listed first, the PM prioritize consumer protection on Section I: General Principles of the Codex Alimentarius.

Specific Comments:

Section and sentence/ paragraph	Type of change	Rationale
Paragraph 2: Scope	Clarification/ Change	<p>The first three sentences of the proposed Section may be more related to the introductory text as set out in Paragraph 1 of the document and would be moved to the previous Section "INTRODUCTION".</p> <p>Such suggestion take into consideration that these sentences are also dealt on the Purposes of the Codex Alimentarius as set out in the Procedural Manual (PM). It aims to simplify the text and improve comprehension of the Section.</p> <p>The last sentence of the proposed Section may be more related as an introductory text for the next Section "CRITERIA WEIGHTS USED FOR SCORING", simplifying the text.</p>
Proposed changes		
<p>Consider moving the first three sentences of Paragraph 2 to the end of Paragraph 1; Consider moving the last sentence of Paragraph 2 to the beginning of Paragraph 3; and Other minor editorial changes as set out below:</p> <p>[The Committee has to formulate standards on various spices and culinary herbs. As it is not possible for the Committee to initiate work on all standards at the same time. There is a need to prioritize the work taking into consideration factors such as trade pattern; fraudulent practices in international trade and consumer protection. move to the end of paragraph 1]</p> <p>2. The main purpose of this document is to define criteria for ranking and prioritising the Standard Set work on spices and culinary herbs, taking into consideration .The criteria can be summarized as: i) The Volume of production and trade; ii) Consumer Protection; iii) Intended use of the commodity; iv) Existing standards that are already in place; v) International or regional market potential of the commodity; and vi) Need for scientific advice.</p> <p>[In order to effectively utilise these criteria in ranking and prioritising the work, a multicriteria ranking tool for spices and culinary herbs is proposed. Move to the beginning of paragraph 3]</p>		

Section and sentence/ paragraph	Type of change	Rationale
Paragraph 3	Clarification/ Change	<p>To improve adoption of the Document we would like to suggest a direct and objective writing, referring to the Scope instead of listing twice the parameters to be considered.</p> <p>We also would like to consider removing the last two sentences, as already mentioned on the first paragraph, "INTRODUCTION".</p>
Proposed changes		
<p>The criteria used for ranking the commodities include six main parameters as set out on Scope: i) Volume of production and trade; ii) Consumer Protection; iii) Intended use of the commodity; iv) Existing standards that are already in place; v) International or regional market potential of the commodity; and vi) Need for scientific advice. These criteria are based on the criteria mentioned in the Codex Procedural Manual for the establishment of work priorities. Additional parameters such as need for scientific advice have been added to the criteria.</p>		

Section and sentence/ paragraph	Type of change	Rationale
Table 1 B. 2.	Clarification/ Change	The word “prevalent fraudulent practices” may induce bias and should be changed to “quality improvement need due to lack of GAP or GMP”; “general quality improvement need” etc.
Proposed changes		
<p>Extent of prevalent fraudulent practices- <u>quality improvement need due to lack of GAP or GMP</u> - or <u>general quality improvement need</u> - or <u>Rejections in the International market due to poor quality/filth</u></p>		

Section and sentence/ paragraph	Type of change	Rationale
Table 1 F. 1.	Clarification/ Removal	Risk analysis is not under CCSCH Terms of Reference and not an adopted step/issue of Commodity Committees.
Proposed changes		
Requirement for risk analysis		

Section and sentence/ paragraph	Type of change	Rationale
Paragraph 6	Clarification/ Change	Restricting WG membership to experts may not be feasible.
Proposed changes		
<p>A physical working group can may be constituted by the Committee to prioritize the new work proposals as per the criteria given above in Table 1. The Working Group will be open to all members and observers and will comprise of experts working in the field of spices and herbs. The working group will rank the proposals for new work taking into account the Criteria <u>used for ranking the commodities</u>. The Committee will prioritize its proposals for new work at each CCSCH meeting based on the recommendations from the Working Group.</p>		

Section and sentence/ paragraph	Type of change	Rationale
Paragraphs 7 and 8	Clarification/ Removal	Imposing detailed procedures to the WG may constitute a barrier to efficiency as data shall not be available during CCSCH Session. Most of criteria need review of the literature and data to be presented by any member that aims to present a Project Document to CCSCH.
Proposed changes		
<p>7. The proposed multicriteria based ranking process will include the following activities:</p> <ul style="list-style-type: none"> • Collect the published information from the peer reviewed literature • Collect information on volume of production and trade data from reliable sources <p>8. The activities mentioned in point 7 above will be carried out by the Physical working group.</p>		

COSTA RICA

Costa Rica apoya en general el documento presentado y agradece a India por su trabajo. Costa Rica considera que se deberían cambiar algunos de los valores de los porcentajes asignados de la siguiente manera:

NÚMERO DE LA PUNTUACIÓN	PONDERACIÓN DE LOS CRITERIOS	PROMEDIO DE LA PONDERACIÓN
A.	Volumen de producción y comercio	40 % 30%
B.	Protección <u>de la salud del</u> consumidor	25 % 30%
C.	Uso previsto del producto	10 %
D.	Normas en vigor	10 %
E.	Mercado internacional o regional potencial	10 %
F.	Necesidad de asesoramiento científico	5% 10%

Justificación: Los cambios propuestos son sugeridos de acuerdo a lo establecido en el primer objetivo del Manual de Procedimiento que establece "proteger la salud de los consumidores y asegurar prácticas equitativas en el comercio de alimentos". Por tanto se considera que se le debe dar el mismo nivel de importancia a los rubros A y B.

EUROPEAN UNION

The Member States of the European Union (MSEU) would like to thank India for preparing the proposal for a mechanism for prioritisation of the work of CCSC.

The MSEU do not see a need or justification for developing specific prioritisation criteria for CCSC as proposed in document CX/SCH 14/01/5 because well-defined criteria for considering and prioritising new work already exists in the Codex Procedural Manual "Criteria for the Establishment of Work Priorities". Creating parallel specific prioritisation criteria for CCSC would be confusing and could be counterproductive.

The criteria laid down in the Procedural Manual are used by other commodity committees and it is required for the critical review by CCEXEC. Moreover, project documents for new work have to be drawn up in accordance with the criteria of the Procedural Manual.

The proposed prioritisation criteria are partly overlapping with the criteria laid down in the Procedural Manual. The proposed criteria contains some elements which are not foreseen in the Procedural Manual, e.g. a need for scientific advice, while some of the criteria of the Procedural Manual are not included, e.g. the amenability of the commodity to standardisation.

The proposed scoring system is complicated and scoring the weight of different criteria could be rather arbitrary. Moreover, the document does not provide options for cases where scoring is insufficient. It seems necessary to allow the committee to conclude, where appropriate, that the elaboration of a standard is not pertinent.

For the above reasons, the MSEU are of the view that CCSC should not develop specific prioritisation criteria of its own but should instead use the prioritisation criteria laid down in the Procedural Manual "Criteria for the Establishment of Work Priorities".

IRAN**MECHANISMS FOR PRIORITIZATION OF THE WORK (Agenda Item 5)**

- **Comments on "CRITERIA WEIGHTS USED FOR SCORING" Table 1: Criteria to score and rank the commodities**

SNO.B. Average Weighting Of Consumer Protection: **20%**

SNO.E. Average Weighting Of International or Regional Market Potential: **15%**

SNO.F. Requirement of the health value 10(a new factor)

JAPAN

Japan appreciates India's initiative toward drafting mechanisms for prioritization of the work and is happy to provide comments as follows:

General comments

1. Japan notes that the Committee should consider *the Criteria for the Establishment of Work Priorities* and *the Guideline on the Application of the Criteria for the Establishment of Work Priorities (criteria applicable to commodities)* in the Procedural Manual to establish criteria for prioritization of the works.
2. Japan would like to request India to revise the table in accordance with *the Criteria for the Establishment of Work Priorities* and *the Guideline on the Application of the Criteria for the Establishment of Work Priorities (criteria applicable to commodities)*.

The way of weight average weighting and scoring should be considered after criteria are agreed, if appropriate.

[Rationale]

3. In line with above-mentioned documents, there are seven criteria: (a) Volume of production, consumption and trade; (b) Diversification of national legislations and apparent resultant or potential impediments to international standards; (c) International or regional market potential; (d) Amenability of the commodity to standardisation; (e) Coverage of the main consumer protection and trade issues by existing or proposed general standards; (f) number of commodities which would need separate standards indicating whether raw, semi-processed or processed and (g) work already undertaken by other international organizations.
4. Japan appreciates criteria proposed by India; however, departure from the criteria of the above-mentioned documents may cause confusion for CCEXEC to conduct a critical review of proposals to undertake work in accordance with Rule V. 2.
5. With regard to the priority setting criteria for new works, Japan would like to cite the results of other Commodity Committees. At 25th CCPFV (2010), the Committee did not agree to develop any additional specific criteria for setting of work priorities as the Criteria for the Establishment of Work Priorities of the Procedural Manual were sufficient for setting priorities for the future work of the Committee¹. Moreover, at 16th CCFFV (2011), the Committee agreed that there was no need to develop specific decision-making and priority setting criteria as the existing guidance in the Procedural Manual was sufficient and the delays in standard setting were not due to the absence of specific criteria².

KENYA

3. CRITERIA WEIGHTS USED FOR SCORING

General Comment:

Kenya appreciate and support the criteria used for ranking the commodities include six main parameters: i) Volume of production and trade; ii) Consumer Protection; iii) Intended use of the commodity; iv) Existing standards that are already in place; v) International or regional market potential of the commodity; and vi) Need for scientific advice. These criteria are based on the criteria mentioned in the Codex Procedural Manual for the establishment of work priorities. Additional parameters such as need for scientific advice have been added to the criteria. However we would like to comment on part B on consumer protection as indicated below herein

Table 1: Criteria to score and rank the commodities

SPECIFIC COMMENT

B. Consumer Protection with average weighting of 25% to be considered for review. This is because all standards are important to protect the health of consumer and to facilitate trade. The health of the consumer can only be protected when the food is safe.

¹ REP11/PFV paras 16-18

² REP11/FFV para 12