

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 GENERAL PRINCIPLES

Thirtieth Session

Paris, France, 11 - 15 April 2016

COMMENTS OF BRAZIL AND COSTA RICA¹

CONSISTENCY OF THE RISK ANALYSIS TEXTS ACROSS THE RELEVANT COMMITTEES

Costa Rica would like to thank the Codex Secretariat, FAO and WHO for the study conducted.

Costa Rica considers that the document CX/GP 16/30/4 does not collect the concerns that in diverse opportunities have expressed in conjunction with other countries; Therefore, Costa Rica asks to take it into consideration in this CCGP30, in order to comply with the agreement of the CAC37, and the concerns raised are addressed when considering the consistency between the principles for risk analysis applied by various committees, either in the debate on this issue, or through an amendment to this document.

At the 37th session (2014):

45. The Commission noted that at CCPR46, a number of Delegations had generally supported the document. The Delegation of Costa Rica, speaking as Coordinator for CCLAC, said that at CCPR46 a number of Delegations of the region, while recognising that the periodic review had become more flexible, had expressed the reservations that the revised review procedure still allowed Codex maximum residue limits (MRLs) for pesticides to be revoked without scientific evidence⁸. They considered this inconsistent with the Working Principles for Risk Analysis for Application in the framework of the Codex Alimentarius and the risk analysis principles developed by other Codex committees.

46. The Commission:

i. Noted the general support for adoption of the revised document.

ii. Noted the reservations of Argentina, Brazil, Chile, Colombia, Costa Rica, Ecuador, Panama and Uruguay concerning the periodic review procedure.

*iii. Noted that, **at its next session, CCGP would address the concerns raised when considering the consistencies of risk analysis principles of different committees.** (The highlighted isn't the original).*

iv. Recommended adoption of the revised principles and their inclusion in the Procedural Manual. (párr. 45-46, REP14/CAC).

Later the CCLAC19 (2014), expressed the view that there exist differences between CCPR and other committees that apply risk analysis in the establishment of food safety standards, as the CCPR set a specific term for re-evaluation for pesticides and requested updated information which, if not available, meant that the pesticides and/or related MRLs were revoked. **Other committees however revoked safety standards only when there was new information that the pesticide compromised human health.** Consequently, the Codex Committee on General Principles (CCGP) should therefore examine this issue at its next session in 2015 and make recommendations on how to resolve this difference when considering the consistency of the risk analysis texts across committees. (paragraph 64, REP15/LAC) but it was not possible to have the document available to the CCGP29. (The highlighted is not the original).

Following up, for CGP30, is prepared the CX/GP16/30/4 document, with a brief analysis of the coherence of the texts on risk analysis in all relevant committees, **but does not address the concerns expressed by many of CCLAC countries.** This concerns are concretized in the statements made at the meeting of CCPR46 (REP14 / PR, párr.164).

¹ The Spanish version of these comments can be found in document CX/GP 16/30/4 Add.1, Costa Rica.

Given the above, and in accordance with the Procedural Manual (23 th edition), Principles for the Risk Analysis for Application in the Framework of the Codex Alimentarius:

10. *When there is evidence that a risk to human health exists but **scientific data are insufficient or incomplete**, the Codex Alimentarius Commission should not proceed to elaborate a standard but should consider elaborating a related text, such as a code of practice, **provided that such a text would be supported by the available scientific evidence**. (The highlighted isn't the original).*

12. ***The needs and situations of developing countries should be specifically identified** and taken into account by the responsible bodies in the different stages of the risk analysis. (The highlighted isn't the original).*

Costa Rica agrees the recommendations made in the short and medium term according to the analysis in CX/GP 16/30/4 document; however reiterates that has been omitted the compliance with the mandate of the CAC37 for addressing the concerns raised in considering the coherence between the principles for risk analysis applied by the different committees; although in Appendix 2 of the same document, are evidenced, substantial differences in the risk management (Risk Management). For that reason, Costa Rica requests, to supplement CX/GP 16/30/4 document with another document which addresses such concerns and examine the coherence between the texts on risk analysis in Codex committees, always using science as a fundamental pillar in the Codex decision-making.