

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
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Agenda Item 10

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Forty-first Session

Dusseldorf, Germany
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DISCUSSION PAPER ON A PRIORITIZATION MECHANISM TO BETTER MANAGE THE WORK OF CCNFSDU

Comments by CRN and IADSA

CRN – COUNCIL FOR RESPONSIBLE NUTRITION

CRN appreciates the German host country for CCNFSDU and the work they have invested in preparing the discussion paper on a prioritization mechanism to better manage the work of CCNFSDU. We are pleased to provide our feedback on the draft proposal.

CRN agrees that the CCNFSDU Terms of Reference (ToR) should be the overarching yard-stick (meter-stick) for developing a priority process for the committee's program of work; i.e., (a) the study of nutritional problems, (b) the drafting of general provisions concerning nutritional aspects, (c) the development of standards and guidelines for foods for special dietary uses; and (d) to endorse provisions on nutritional aspects for inclusion in Codex standards. Fundamental and prior to any further evaluation is the requirement that the work must advance the "nutrition" mission of the committee. One could formulate an endless list of possible projects for the Committee that potentially impact public health, food safety and fair trade practices, but are not properly before the CCNFSDU because they don't directly further the promotion of nutrition around the globe. Such topics are properly the province of other Codex committee. The CCNFSDU prioritization should make this assumption explicit as an a priori condition.

Further, CRN agrees that the identification of weighting/rating/ranking criteria that can be objectively, consistently, and transparently applied to new work proposals would be the best arbiter for inclusion onto a priority list of agenda items. An established and independent 'priorities working group' (PWG) should be formed and tasked with the weighting/rating/ ranking of submitted proposals for new work in an objective, consistent and transparent fashion to establish on-going priorities.

CRN recommends that the use of subjective terms, such as 'high', 'medium', and 'low' should be correlated to objective criteria for making these designations, as seemingly every new work proposal submitted would be an automatic 'high' in the eyes of the submitter. Criteria for weighting/rating/ranking should validate the impact sufficiently for the PWG to justify objectively, consistently and transparently the inclusion of true 'new work' on the CCNFSDU agenda.

CRN suggests that, just as relevant and accurate data packages are needed by other Codex committees as they make decisions on accepting new work proposals, the PWG should also require supporting data packages that truly identify against the CCNFSDU ToR that the new work would have 'high' impact on public health, on food safety and on fair trade practices. Representations of potential harms from the failure to act and potential benefits from developing the proposed work should be supported by validated facts and scientific data, not just vague assertions of the possible risks of Codex's failure to pursue a proposal. Supposed risks to targeted populations or harms to trade practices should be not only well-supported by evidence but also be externally validated. New work should outline a problem, but not offer a predetermined solution, that is the job of the CCNFSDU physical and/or electronic Working Groups and the CCNFSDU delegates.

CRN believes that true new work proposals should limit the CCNFSDU's workload not irresponsible enlarge it; rationale for new work should contain an estimation of the resources and time frame needed to address the new work; justification as to why CCNFSDU in particular (and/or Codex in general) is the best organization to undertake the new work; and that the likely outcome of embarking on new work does not unfairly or unnecessarily burden individual countries.

Lastly, all submissions to and the decisions of the PWG should be made public, so that opposing viewpoints can be considered and evaluated fairly. An opportunity to present opposing data to challenge new work proposals should be built into the public review of all submissions and the decisions by the PWG.

CRN respectfully requests that the Codex CCNFSDU chair and secretariat consider our comments in the spirit in which they are being offered; to develop a prioritization mechanism that will truly work independently, objectively, consistently, and transparently in managing the workload at the Codex Committee on Nutrition and Foods for Special Dietary Uses.

IADSA - INTERNATIONAL ALLIANCE OF DIETARY/FOOD SUPPLEMENT ASSOCIATIONS

The International Alliance of Dietary/Food Supplement Associations (IADSA) welcomes the opportunity to comment on the Discussion Paper from Germany on a prioritisation mechanism to better manage the work of CCNFSDU.

We welcome the reference in the discussion paper to the Terms of Reference (ToR) of the CCNFSDU. To ensure that the process of prioritisation of new work will be the most appropriate for the Committee to address current and future workload, we would like to suggest that new work should be in line with the ToR of the CCNFSDU, which focus on nutrition issues.

We support that a mechanism for decisions on future work will include:

- a. identification of criteria (weighing/rating),
- b. determining a process for considering and prioritizing proposals for new work and that additional specific criteria are applied,
- c. creation of an *ad hoc* Working Group (WG) for the Establishment of CCNFSDU Work Priorities.

For the sake of transparency, it would also be important that the suggested WG provides guidance on the criteria for the interpretation of the rating terms 'high', 'medium' and 'low' mentioned in paragraph 2 of Appendix A of the draft Guideline in order to help the proposing party to choose and justify the respective impact level as mentioned in paragraph 6 and for the WG to judge such justification objectively and consistently in time.

We also consider it is important that expertise should be made available to this WG to review the accuracy of data submitted, notably related to the criteria "impact on public health", "impact on food safety" and "impact on fair trade practices" and their rating (high, medium, low).

Finally, it is indicate that a summary document, presenting the proposals for new work and the associated self-assessment against the proposed criteria, will be circulated by the CCNFSDU host country Secretariat to the Codex members and observers. It is our understanding that this summary will also provide the full set of documents submitted by the proposing party. We would appreciate confirmation of this.