

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 8

CRD19x

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-third Session

DISCUSSION PAPER ON REGULATORY APPROACHES TO THIRD PARTY CERTIFICATION IN FOOD SAFETY

Comments of Brazil

Brazil

Brazilian comments on Discussion paper on Regulatory Approaches to Third Party Certification in Food Safety (Agenda item 8, CX/FICS 17/23/8)

Brazil would like to congratulate and to thank Canada and United Kingdom for preparing the discussion paper and the draft project document on Regulatory Approaches to Third Party Certification in Food Safety. We understand the importance of the subject. However, we would like to see a comprehensive analysis with more details.

For that reason, we present some questions:

- Could you present more examples of common approach on how third party certification schemes could be used in a regulatory context?
- What would be the benefits to the international food market with the approval of this document?
 - ✓ Will the benefits cover most of the member countries?
 - ✓ Which are the main food chains that would be impacted?
 - ✓ Which chains are prepared and which ones would still have to adapt to this reality?
 - ✓ Considering the points raised in the topic "Concerns and Challenges" (paragraphs 18-21), it is important to prior assess the impact and benefits of third-party certification programs, especially for developing countries and small enterprises, considering the possibility of significant modification, and often even mandatory for the export of products, their traditional production practices and increased costs.
 - ✓ In the draft document, item 5, there is mention that for developing countries the 3rd party certification schemes could offer opportunities to help strengthen the NFCS of countries. Based on what data this statement is presented?
- Why this paper excludes private standards that are set under a buyer/seller contractual arrangement? This type of private standards are reported as huge concern since they put requirement more restrictive than necessary, increase cost for small/medium size producers and overlap disciplines already established by recognized international organizations. Therefore, they should be part of the purpose and the scope of this proposal;
- Would third-party certification programs be restricted only to ensure specific standards laid down by the competent authority? (Paragraph 9).
- The document needs more substantive information on how the competent authority will verify/audit this third-party certification. How deal with third party certification that result in a requirement more restrictive than necessary? The governments will control these requirements?

- The Codex Alimentarius Strategic Plan 2014 to 2019 identifies the need for committees to be able to prioritise new work. In this sense, we consider that this discussion paper should give more information related to:
 - The strategic importance of the issue;
 - The impact with regard to food safety or ensuring fair practices in the food trade.

Therefore, Brazil believes that the above questions should be better discussed mainly assessing the impact on the various sectors of food production and the food industry, considering its heterogeneity and peculiarity.