



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

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DRAFT PRINCIPLES AND GUIDELINES FOR THE ASSESSMENT AND USE OF VOLUNTARY THIRD-PARTY ASSURANCE (vTPA) PROGRAMMES

Comments at Step 6 (in reply to CL/FICS 2019/93/OCS-FICS)

Comments of Brazil, Canada, Colombia, Denmark, Ecuador, Egypt, Indonesia, Iraq, Japan, Peru, Nicaragua, New Zealand, Syria, CCTA, Consumer Goods Forum, FAO and IUFOST

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to [CL/FICS 2019/93/OCS-FICS](#) issued in September 2019 with a deadline for submission of comments of 31 December 2019.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format, while Annex II contains comments submitted by email.

ANNEX 1

COMMENTS ON THE PROPOSED DRAFT PRINCIPLES AND GUIDELINES FOR THE ASSESSMENT AND USE OF VOLUNTARY THIRD-PARTY ASSURANCE PROGRAMMES

Comments at Step 6 (in reply to CL/FICS 2019/93/OCS-FICS)

GENERAL AND/OR SPECIFIC COMMENTS ON PARAGRAPHS AND SECTIONS	MEMBER/OBSERVER AND RATIONALE WHERE APPLICABLE
<ul style="list-style-type: none"> Canada suggests consideration of a numbering system to simplify readability of the document, particularly in sections E, F and G, which contain sub-headers without a numbering system. The term “Voluntary Third Party Assurance” and/or the acronym “vTPA” occur in the title and throughout the document, and in several places, including in the title, are missing the complementary word “programme”. Canada would recommend that the document be carefully reviewed to make the editorial revisions where necessary. Since the text in square brackets is under discussion within the CCFICS Electronic Working Group, Canada has not made further comments on that text with one exception for the title of principle 5. Canada may provide comments once the outputs of the EWG is made available. 	Canada
Brazil would like to thank for the work done by the United Kingdom, Canada and Mexico and would like to provide some specific comments presented below.	Brazil
Indonesia would like to appreciate the work done by Chair for preparing Draft Principles and Guidelines for the Assessment and Use of Voluntary Third-party Assurance	Indonesia
In response to the request for comments on the proposed draft principles and guidelines for the assessment and use of voluntary third-party assurance (for adoption at step 6), GFSI is pleased to say that it fully supports the document and has no further comments.	Consumer Goods Forum
No comments	Syrian Arab Republic
IUFOST supports all Codex efforts to assure food quality and safety and compliance with Codex standards, other limits for additives and contaminants and codes of practice. While this document establishes voluntary assurance recommendations, Codex Memembr Countries could consider making these procedures mandatory.	IUFOST
Egypt agrees with the proposed document with no comments.	Egypt
We are agree with draft and we have no comments	Iraq
PREAMBLE	
<p>1. Food business operators (FBOs) have the primary role and responsibility for managing the food safety of their products and for complying with regulatory requirements relating to these aspects of food under their control. Competent Authorities require FBOs to demonstrate that they have effective controls and procedures in place to protect the health of consumers and ensure fair practices in food trade. Many FBOs use quality assurance systems, including</p>	<p>Japan For simplicity</p>

<p>voluntary third-party assurance (vTPA) programmes to reduce supply chain risks and confirm food safety outcomes.</p>	
<p><u>2.</u> The Codex Principles and Guidelines for National Food Control Systems (NFCS) (CAC/GL 82-2013)¹ foresee competent authorities taking into account quality assurance systems in their national food control system. Competent authorities may choose to do this by establishing an arrangement with a vTPA programme owner to use the data/information generated by vTPA programme <u>implementation</u> to support their regulatory controls. In any case, they should satisfy themselves that any information/data they intend to use is both reliable and fit for purpose.</p>	<p>Canada Editorial comment for completeness of the sentence</p>
<p><u>2.</u> The Codex Principles and Guidelines for National Food Control Systems (NFCS) (CAC/GL 82-2013)¹ foresee competent authorities taking into account quality assurance systems in their national food control system. Competent authorities may choose to do this by establishing an <u>arrangement-agreement</u> with a vTPA programme owner to use the data/information generated by vTPA programme to support their regulatory controls. In any case, they should satisfy themselves that any information/data they intend to use is both reliable and fit for purpose.</p>	<p>Peru</p>
<p><u>3.</u> These guidelines are intended to assist competent authorities in their consideration of vTPA programmes. They provide a framework and criteria for assessing the integrity and credibility of the governance structures and <u>vPTA programme and</u> the reliability of information/data generated by such programmes to support NFCS objectives. When carrying out such an assessment competent authorities should be guided by their intended use of the vTPA programme information and should only apply assessment criteria that are relevant to that purpose.</p>	<p>Canada Suggested revision to emphasize that integrity and credibility also apply to the vTPA programme and not only the governance structures.</p>
<p><u>3.</u> These guidelines are intended to <u>assist-guide</u> competent authorities in their consideration of vTPA programmes. They provide a framework and criteria for assessing the integrity and credibility of the governance structures and the reliability of information/data generated by such programmes to support NFCS objectives. When carrying out such an assessment competent authorities should be guided by their intended use of the vTPA programme information and should only apply assessment criteria that are relevant to that purpose.</p>	<p>Peru</p>
<p><u>3.</u> These guidelines are intended to assist competent authorities in their consideration of vTPA programmes. They provide a framework and criteria for assessing the integrity and credibility of the governance structures and the reliability of information/data generated by such programmes to support NFCS objectives. When carrying out such an assessment competent</p>	<p>CCTA <i>[Translator's note: The proposed amendment does not change the meaning of the text in English.]</i></p>

<p>authorities should be guided by their intended use of the vTPA programme information and should only apply assessment criteria that are relevant to that purpose.</p>	
<p>4. Reliable vTPA information/data may be used in general to better risk-profile <u>risk-profiled</u> sectors, and in some circumstances individual FBOs. This may lead to smarter data-driven prioritisation of official resources, while FBOs participating in robust vTPA programmes may benefit through an appropriate risk-based reduction in the frequency/intensity of regulatory controls e.g. inspection, sampling. Conversely, poorly performing FBOs, or sectors, may be subject to increased official regulatory controls based on trends identified through the information/data shared by the vTPA owner.</p>	<p>Japan</p>
<p>4. Reliable vTPA information/data may be used in general to better risk-profile sectors, and in some circumstances individual FBOs. This may lead to smarter data-driven prioritisation of official resources, while FBOs <u>participating in using</u> robust vTPA programmes may benefit through an appropriate risk-based reduction in the frequency/intensity of regulatory controls e.g. inspection, sampling. Conversely, poorly performing FBOs, or sectors, may be subject to increased official regulatory controls based on trends identified through the information/data shared by the vTPA owner.</p>	<p>Peru</p>
<p>B. SCOPE</p>	
<p>5. These guidelines are intended to assist competent authorities within their national boundaries in the effective assessment and transparent use of reliable-vTPA programme information/data in support of their NFCS objectives.</p>	<p>Nicaragua We suggest deleting this term. The reliability of the information/data will be judged as a result of the assessment process that the competent authority may carry out. See our comments about paragraph 13.</p>
<p>6. Its <u>Their</u> focus is the structure, governance and components of vTPA programmes that align <u>with</u> and support NFCS objectives relating to protecting consumer health and ensuring fair practices in food trade.</p>	<p>Canada Editorial revision – should be in the plural tense since the pronoun is referring to “These guidelines” mentioned in paragraph 5. Editorial, for accuracy</p>
<p>6. Its focus is the structure, governance and components of vTPA programmes that align and support NFCS objectives relating objectives, <u>which are related</u> to protecting consumer health and ensuring fair practices in food trade.</p>	<p>Nicaragua</p>
<p>7. The guidelines do not oblige competent authorities to use vTPA programme outcomes nor do they mandate the use of vTPA-Use by a Competent Authority of information/data from FBOs i.e. emphasising that the decision to use vTPA information/data by the competent authority is voluntary generated by a vTPA programme is optional/voluntary and will be based on the assessment that the National Competent Authority may carry out.</p>	<p>Nicaragua It is not the purpose of this document to oblige the parties to follow its recommendations, but rather to provide general guidance to improve a process or activity, so we suggest amendments to the wording that are consistent with the nature of the guidelines.</p>
<p>8. The guidelines do not apply to official inspection systems or official certification systems administered by government agencies having a</p>	<p>CCTA</p>

regulatory or enforcement jurisdiction, nor officially recognised inspection or certification bodies ² that certify to a regulatory standard for which compliance is mandatory.	<i>[Translator's note: The proposed amendment does not change the meaning of the text in English.]</i>
9. The guidelines are not intended to apply to private standards [that that are the subject of commercial contractual arrangements between buyers and sellers, and does not apply to components of vTPA programmes] programmes that are outside the scope or requirements of the competent authority.	Indonesia Indonesia proposes to open the square-bracket, to make it clear and provide useful information.
9. The guidelines are not intended to apply to private standards [that that are the subject of commercial contractual arrangements between buyers and sellers, and does not apply to components of vTPA programmes] programmes that are outside the scope or requirements of the competent authority.	Japan We agree with the text in square brackets. (Delete the square brackets.)
9. The guidelines are not intended to apply to private standards [that are the subject of commercial contractual arrangements between buyers and sellers, and does not apply to components of vTPA programmes] that are outside the scope or requirements of the competent authority.	New Zealand New Zealand comment: the bracketed text does not really add any additional clarity and should be deleted.
9. The guidelines are not intended to apply to private standards [that <u>which</u> are the subject of commercial contractual arrangements between buyers and sellers, and does not apply to components of vTPA programmes] that are outside the scope or requirements of the competent authority.	Peru
9. The guidelines are not intended to apply to private standards [that that are the subject of commercial contractual arrangements between buyers and sellers, and does not apply to components of vTPA programmes] programmes that are outside the scope or requirements of the competent authority.	Nicaragua
10. These guidelines do not constitute approval, recognition or endorsement of vTPA programmes. It follows that competent <u>Competent</u> authorities may choose approaches other than that described in these guidelines when considering how to take into account vTPA programmes in their risk-based targeting of regulatory controls.	Canada Editorial revision
C: DEFINITIONS³	
<u>For the purposes of this document, the following definitions apply:</u>	Canada Canada would recommend deleting dictionary definitions as they are superfluous. A number of definitions are very specific to this particular document and are sourced from ISO texts which are outside the purview of Codex and may change in the future while Codex texts should endure. It is also important that these definitions do not establish precedents for other Codex texts. It is recommended to include the proposed preamble in this section to specify that the definitions are for the purposes of this document. A similar approach has been taken in

	the definitions sections of other Codex texts where such definitions were specific to a particular text.
Accreditation: third party attestation related to a conformity assessment body conveying formal demonstration of its competence to carry out specific conformity assessment tasks. (Source: ISO 17000:2004)	Colombia We request that this last phrase be added for further clarity and for alignment with the ISO 17000 standard.
Accreditation: third party attestation related to a conformity assessment body conveying formal demonstration of its competence to carry out specific conformity assessment tasks. (Source: ISO 17000:2004)	Peru (Comment: It is recommended to avoid repetitions in Codex Documents. The terms “conformity assessment” implies already that this is a matter of competence). ISO/IEC 17000:2004 CONFORMITY ASSESMENT. Vocabulary and general principles. Check the official translation of the ISO definition.
Accreditation body: authoritative body that performs accreditation. (Source: ISO 17000:2004)	Colombia We request that the following be added: “Note: The authority of an accreditation body is generally derived from government”, for further clarity and for alignment with the ISO 17000 standard.
Accreditation body: authoritative body that performs accreditation. (Source: ISO 17000:2004)	Peru Comment with reference to ISO/IEC 17000:2004 CONFORMITY ASSESMENT. Vocabulary and general principles, official translation. [<i>Translator’s note: The proposed amendment does not change the meaning of the text in English.</i>]
Attestation: issue of a statement, based on a decision following review that fulfilment of specified requirements has been demonstrated are complied with . (Source: ISO 17000:2004)	Peru ISO/IEC 17000:2004 CONFORMITY ASSESMENT. Vocabulary and general principles, official translation. (Comment: No change is made to the text, but this should be expressed in the third person, so “fulfilment of... has been demonstrated”, like in the original text, is a better wording.)
Audit: Audit: is a systematic and functionally independent examination to determine whether activities and related results comply with planned objectives, systematic, independent, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled. (Source: CXG 20-1995 -ISO 17000:2004)	Colombia Whereas “audit” applies to management systems, “assessment” applies to conformity assessment bodies and also more generally. We request that this definition of “audit” be replaced with the updated, more recent one, in ISO 17000.
Certification Conformity assessment body: body that performs conformity assessment services. A provider of certification services, accredited by a nationally recognised accreditation body. (Source: ISO 17000:2004)	Colombia We request that the definition of “certification body” be replaced with that of “conformity assessment body” in ISO 17000, because that is the correct one, whereas the other one does not exist.
Certification body: A provider of certification services, accredited by a nationally recognised accreditation body. (Source: ISO 17000:2004)	Peru (Comment: The source should be revised, since the definition can be found in the ISO link https://www.iso.org/obp/ui/#iso:std:iso-iec:17000:ed-1:v1:en:sec:2.6 , in the terms section, point 2.6 (in the latest 2005 version). This definition does not exist in ISO/IEC 17000:2004 CONFORMITY ASSESMENT. Vocabulary and general principles.
Conformity assessment: demonstration that specified requirements relating to a product, process, system, person or body are fulfilled. (Source: ISO 17000:2004)	Colombia We believe that the notes to the definition of “conformity assessment” in ISO 17000 should be

	<p>included, for further clarity of the document and for alignment with the international standard.</p> <p>NOTE 1: The subject field of conformity assessment includes activities defined elsewhere in this International Standard, such as testing, inspection and certification, as well as the accreditation of conformity assessment bodies.</p> <p>NOTE 2: The expression “object of conformity assessment” or “object” is used in this International Standard to encompass any particular material, product, installation, process, system, person or body to which conformity assessment is applied. A service is covered by the definition of a product.</p>
<p>Credibility (dictionary): The quality of being trusted and believed in. (Source: Oxford-English Dictionary).</p>	<p>Nicaragua Nicaragua suggests deleting this definition, since it is a general, commonly used term.</p>
<p>Procedure: specified way to carry out an activity or a process. (Source: ISO 17000:2004)</p>	<p>Peru (Comment: Accepted as a better translation). Official translation of ISO/IEC 17000:2004. Consider the definition in the ISO standard. [Translator’s note: The proposed amendment does not change the meaning of the text in English.]</p>
<p>Review: verification of the suitability, adequacy and effectiveness of selection and determination activities, and the results of these activities, with regard to fulfilment of specified requirements by an object of conformity assessment. (Source: ISO 17000:2004)</p>	<p>Colombia We believe that the last phrase in ISO 17000 should be included, for further clarity of the document and for alignment with the international standard.</p>
<p>Review: verification of the suitability, adequacy and effectiveness of selection and determination activities, and the results of these activities, with regard to fulfilment of specified requirements specified requirements by an object of conformity assessment. (Source: ISO 17000:2004)</p>	<p>Peru (Comment: Accepted. Official translation of ISO/IEC 17000:2004.)</p>
<p>Specified requirement: need or expectation that is stated. (Source: ISO 17000:2004)</p>	<p>Colombia We believe that the note in ISO 17000 should be included, for further clarity of the document and for alignment with the international standard.</p> <p>NOTE: Specified requirements may be stated in normative documents such as regulations, standards and technical specifications. (Source: ISO 17000:2004)</p>
<p>Voluntary Third-Party Assurance Programme: An autonomous scheme comprising of the ownership of a standard that may utilise national/international requirements; a governance structure for certification and conformity assessment that provides for periodic onsite audits for FBO operations for compliance with the standard, and in which FBO participation is voluntary. [Source: new]</p>	<p>Denmark Voluntary Third-Party Assurance should be defined, or at least a connection to the shortening vTPA should be made to eliminate confusion. The shortening is described in A. PREAMBLE point 1 so maybe a mentioning of (vTPA) could be enough to include in this definition "Voluntary Third-Party Assurance (vTPA) Programme".</p>
<p>Voluntary Third-Party Assurance Programme: An autonomous-autonomous, voluntary scheme comprising of the ownership of <u>a scheme based on</u> a standard that may utilise national/international requirements; a governance structure for certification and conformity assessment that provides for periodic onsite audits for FBO operations for compliance with the standard, and in which FBO participation is voluntary. (Source: new)</p>	<p>Nicaragua An assurance programme must comprise, at least:</p> <ul style="list-style-type: none"> - Technical requirements, defined by a standard; - Governance structure; - Audit provisions <p>Consequently, we propose the term “scheme”, which is consistent with the definition in ISO/IEC 17000:2004, point 2.8.</p>

	In addition, we propose deleting the term “certification”, since it is part of the conformity assessment activities, and it would be redundant to maintain both words. The above is stated in the first note to the definition of conformity assessment (ISO/IEC 17000:2004).
vTPA Owner: Person or organisation responsible for developing and maintaining a specific vTPA programme. (Source: Adapted from ISO IEC 17065)	Nicaragua For consistency with the terms used in the Spanish version of ISO/IEC 17065 (see point 3.11 of said standard). [<i>Translator’s note: The proposed amendment does not change the meaning of the text in English.</i>]
vTPA Owner: Person or organisation responsible for developing and maintaining a specific vTPA programme. (Source: Adapted from ISO IEC 17065 17065)	CCTA
D:PRINCIPLES	
Principle 3[Process and policies]	
[Where the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.]	
New Zealand agrees with the deletion of this as a standalone principle and suggest that the intent to clarify that competent authorities need policies and processes to support implementation can be better captured by amending Principle 5 (see below comment).	New Zealand
Indonesia supports to move the current text to Section G and proposes to replace the text into: <u>Where the competent authority has established an arrangement with a vTPA programme owner to use vTPA data/information to support their NFCS objectives, the arrangement should be based on transparent policies and processes.</u>	Indonesia
We agree to move the text to section G and this principle should be deleted here.	Japan
We agree with maintaining principle 3, related to alerting of public health risks.	Colombia
We consider that the content of this paragraph is already included in paragraph 15, so it should be deleted.	Peru
Principle 5 [Proportionality]	
The actions of the competent authority to make use of vTPA information/data should not directly or indirectly mandate additional requirements, costs or restrictions on FBOs over and above regulatory requirements.	
The title of the section does not reflect its content. Canada suggests replacing “proportionality” with “Impact on FBO”.	Canada
Principle 5 [Proportionality]	Japan
Principle 5 [Proportionality] We agree with maintaining this title for the principle, since it is consistent with the content of the text.	Colombia
Principle 5 [Proportionality] Proportionality Delete square brackets.	Peru

Indonesia agrees with principle 5.	Indonesia
“Proportionality” should be deleted since it is already common action of the competent authority and this does not change by making use of vTPA information/data. “Proportionality” fits better to Principle 7.	Japan
New Zealand suggest replacing ‘actions’ with ‘processes and policies’. This change will pick up what is currently Principle 3 which as written is not a standalone principle.	New Zealand
The actions of the competent authority to make use of vTPA information/data should not directly or indirectly mandate additional requirements, costs or restrictions on FBOs over and above <u>the established</u> regulatory requirements.	Nicaragua FBOs have to comply with the regulatory requirements established by law, so the amendment is proposed to avoid any ambiguous interpretation.
Principle 7 Assessment Proportionality	Japan
E: ROLES, RESPONSIBILITIES RESPONSIBILITIES AND RELEVANT ACTIVITIES:	CCTA
Competent Authorities	
a. Have statutory responsibilities for regulatory requirements set down in the NFCS, as recommended in CAC/GL 82-2013 and authorised by relevant national legislation <u>82-2013</u> .	Canada Canada suggest deleting the end of the sentence since it is duplicative of the term used at the beginning of the sentence, “statutory responsibilities”.
b. May consider using information/data generated by vTPA programmes to support <u>meeting</u> the objectives of their NFCS.	Nicaragua We consider that information from a vTPA programme can contribute to meeting the objectives.
d. Need to clearly describe the use of a vTPA programme information / data within their NFCS and restrict its use when information provided is false or otherwise lacks credibility. <u>d(bis): should have mechanisms in place to verify the continued credibility and reliability of vTPA programme information/data and should restrict its use if information provided is false or lacks credibility.</u>	Canada
d. Need to Should clearly describe the use of a vTPA programme information / data within their NFCS and restrict its use when information provided is false or otherwise lacks credibility <u>NFCS.</u>	Canada Point d includes two concepts: transparency in the use of the information within an NFCS and limiting the use of the information if false, Canada would suggest that two important concepts should be captured in separate bullets and has provided text to this effect, in the form of d(bis).
e. Should ensure any arrangements to use vTPA information/data is fully transparent.	CCTA any arrangement ... is
e. Should ensure <u>Should have procedures in place which allow them to assess the transparency of</u> any arrangements to use vTPA information/data is fully transparent.	Nicaragua This amendment is proposed because an authority has to be able to assess and demonstrate the transparency of the information/data that it uses to meet its NFCS objectives. This is consistent with principle 3 of CAC/GL 82-2013.
f. Have to protect against assess potential conflicts of interest, interest and make <u>decisions regarding their impact on the reliability of the vTPA programme information/data.</u>	Nicaragua We think that a competent authority should assess possible conflicts of interest and determine their probable impact with regard to the fulfilment of its NFCS objectives. In an autonomous and voluntary programme, the competent authority should not take

	any measures to prevent conflicts of interest between the FBO and the vTPA programme owner. It is the Authority's responsibility to determine the potential impact of a certain conflict of interest with regard to the quality of the vTPA programme information/data and make decisions about the suitability of its use.
g. Have to maintain appropriate confidentiality of data [In accordance with the corresponding legal framework in each country.]	Brazil Brazil considers that it is important to maintain the proposed text. It is important that the guideline recognize that each country or region can have a specific legal framework regarding confidentiality of data. So, data confidentiality may vary by location.
g. Have to maintain appropriate confidentiality of data [In accordance with the corresponding legal framework in each country.]	Indonesia Indonesia proposes to delete the square-bracketed text.
g. Have to maintain appropriate confidentiality of data [In accordance with the corresponding legal framework in each country.]	Japan The text without the brackets is sufficient.
g. Have to maintain appropriate confidentiality of data [In accordance with the corresponding legal framework in each country.]	New Zealand New Zealand supports retaining the text currently in [] and removing the brackets. This explicit text is used in other CCFICS text and its use has had strong support from many delegations.
g. Have to maintain appropriate confidentiality of data [In accordance with the corresponding legal framework in each country.] <u>except upon a request by the competent authority.</u>	Colombia We consider that the phrase between square brackets should be replaced by the following: "except upon a request by the competent authority", since the legal framework does not mandate any loss of confidentiality, but in case of an event involving the competent authority, records will be subject to investigation, which means that confidentiality requirements change.
g. Have to maintain appropriate confidentiality of data <u>[In data, in accordance with the corresponding legal framework in each country]</u>	Peru
g. Have to maintain appropriate confidentiality of data <u>[In data, in accordance with the corresponding legal framework in each country]</u>	Peru
g. Have to maintain appropriate confidentiality of data [In in accordance with the corresponding legal framework in each country] <u>country.</u>	Nicaragua
FOOD BUSINESS OPERATORS	
a. Have the primary role and responsibility for managing the food safety of their products and for complying with regulatory requirements relating to these aspects of food under their control.	Japan For simplicity.
e. <u>[Is able to demonstrate that it has no conflicts of interest with the operation of the vTPA.]</u>	Brazil Brazil considers that it is important to maintain the proposed text. It is crucial that both FBOs and vTPA can demonstrate to the competent authorities that there are no conflicts of interest that could unduly influence the judgment of the data / information generated by vTPA program.

e. Is able to demonstrate that it has no conflicts of interest with the operation of the vTPA.]	Indonesia Indonesia proposes to open the square-bracket
e. Is able to demonstrate that it has no conflicts of interest with the operation of the vTPA.]	Japan It does not need to be repeated here. Sub para(f) of the vTPA owner section is sufficient to capture this.
e. [Is able to demonstrate that it has no conflicts of interest with the operation of the vTPA.]	New Zealand New Zealand supports retaining the text in [] and removing the brackets. The owner of the scheme and the FBOs are two separate parties and it is appropriate that this obligation is clear.
e. Has to Is able to demonstrate that it has no conflicts of interest with the operation of the vTPA.]vTPA.	Peru For consistency with (f) in the Competent Authorities section.
e. Has to Is able to demonstrate that it has no conflicts of interest with the operation of the vTPA].	Peru
e. [Is able to <u>provide information to</u> demonstrate that it has no conflicts of interest with the operation of the vTPA.]	Nicaragua An FBO may provide information to the Competent Authority to demonstrate that there is no conflict of interest that could affect the fulfilment of the NFCS objectives. However, it is the Authority's responsibility to determine the validity of the FBO statements.
VOLUNTARY THIRD-PARTY ASSURANCE OWNERS	
a. Are responsible for implementing the governance arrangements of a vTPA programme, which may include utilising national/international standards and independent accredited <u>conformity assessment</u> (e.g. audit and certification -certification).	Nicaragua We suggest amending the term for consistency with the definitions in ISO/IEC 17000:2004.
b. Are accountable to FBOs that participate in vTPA programmes]	Indonesia It is not necessary to include the square-bracketed text as a responsibility of vTPA owner, because Accountability to FBOs is a common thing, for example present the result of vTPA programme to FBO.
b. Are <u>Are</u> accountable to FBOs that participate in vTPA programmes]programmes. e.g. an <u>agreement with the competent authority, decisions to share aggregated information/data generated by the vTPA programme.</u>	Japan We think this is important to illustrate accountability. The examples can be given.
b. [Are accountable to FBOs that participate in vTPA programmes]	New Zealand New Zealand supports deleting this point. This obligation is covered by point d and f.
b. Are accountable to <u>vTPA programme owners are accountable to</u> FBOs that participate in vTPA programmes] <u>for the guidance but not for the findings.</u> [Translator's note: This is one suggested interpretation of the proposal.]	Colombia We agree with maintaining the text, but we think the wording should be amended for further clarity.
b. Are <u>Are</u> accountable to FBOs that participate in vTPA programmes]programmes.	Peru Delete brackets.
b. Are <u>Are</u> accountable to FBOs that participate in vTPA programmes]programmes.	Peru
b. Are <u>Are</u> accountable to FBOs that participate in vTPA programmes]programmes.	Nicaragua

c. Sharing information/data generated by the vTPA programme owners for use by the competent authority, according to the process established by the vTPA programme owners and the competent authority.	CCTA Share... (all the bullets have verbs in indicative)
d. Have policies and processes when in place with the FBO for sharing vTPA information with competent authorities such as notification to the FBO and protections for proprietary information.	Canada Proposed revision for further clarity of the text. Canada would suggest that this point covers the intent of point b, which is unclear and so point b above could be deleted.
d. Have policies and processes when sharing vTPA information such as notification to the FBO and protections for proprietary information.	CCTA <i>[Translator's note: The proposed amendment does not change the meaning of the text in English.]</i>
e. Have policies to ensure a vTPA alerts the competent authority of any significant [public health risks associated with] non-compliances by the regulated industry.	FAO-AGFF FAO proposes to delete the text in the square bracket as we should not limit ourselves to public health risks - important non compliance can be a major consumer deception practice, and in some cases can also be source of a public health risk (that is only ascertained at a later stage).
e. Have policies to ensure a vTPA alerts the competent authority of any significant public health risks associated with non-compliances by the regulated industry.	Indonesia Indonesia proposes to delete the square-bracketed text. Rationale: The term "significant" has a broad meaning which can be adjusted to the policy in each country.
e. Have policies to ensure a vTPA alerts the competent authority of any significant public public health risks associated with <u>with</u> non-compliances by the regulated industry.	Japan We agree with the text in square brackets. (Delete the square brackets)
e. Have policies to ensure a vTPA alerts the competent authority of any significant [public health risks associated with] non-compliances by the regulated industry.	New Zealand New Zealand supports retaining the text in [] and removing the brackets. This must be clearly stated as a responsibility – without such a commitment any vTPA will be suspect.
e. Have policies to ensure a vTPA alerts the competent authority of any significant <u>public</u> public health risks associated with <u>with</u> non-compliances by the regulated industry.	Peru Delete "significant" and square brackets.
e. Have policies to ensure a vTPA alerts the competent authority of any significant <u>public health risks associated with</u> non-compliances by the regulated industry. <u>non-conformities that could involve public health risks, in accordance with the provisions of the competent authority.</u>	Nicaragua We consider it is the authority's responsibility to identify relevant information (non-conformities), which have to be reported by the vTPA programme in case of a non-compliance by an FBO.
f. Have appropriate systems in place to protect against potential conflicts of interest between TPA owners, auditors and FBOs, and <u>to</u> be able to demonstrate adherence to data protection obligations.	CCTA
F. CRITERIA TO ASSESS THE CREDIBILITY AND INTEGRITY OF vTPA PROGRAMMES	
13. Competent authorities that choose to use vTPA programmes in their NFCS should satisfy themselves that the vTPA information/data can be trusted and is fit for purpose. <u>A vTPA programme based on relevant international standards and accredited by an internationally recognized Accreditation Body can be considered reliable in light of the impartiality requirements and its technical</u>	Nicaragua The development of accreditation based on international standards and under internationally recognized schemes has facilitated recognition of organizations and/or voluntary schemes by competent authorities. It would be appropriate for this document to mention the potential contribution of accreditation and

<p><u>competence; however, each national competent authority should carry out an assessment to determine the relevance of the vTPA programme information/data.</u> In order to do this they may carry out a full or partial assessment of the credibility and integrity of the vTPA programme, commensurate with their intended use of the vTPA information/data. When carrying out such an assessment, competent authorities should select the criteria below that are appropriate to the extent of their intended use of the vTPA programme as a start point for this assessment.</p>	<p>international standards to the vTPA programme assessment process carried out by a competent authority.</p>
<p><u>Governance Arrangements</u></p>	
<p>4) Does the vTPA programme have an accreditation arrangement that adheres to the International Accreditation Forum's (IAF) Multilateral Recognition Arrangement or the International Laboratory Accreditation Co-operation (ILAC) or another accreditation body that has similar recognition, international standing and credibility?</p>	<p>Nicaragua We suggest moving this question to the "Accreditation of Certification Bodies" section, for further consistency of the structure and provisions.</p>
<p>5) If the accreditation arrangement does not adhere to IAF or ILAC, does the vTPA programme owner ensure that [certification/accreditation] bodies have the capacity and competency to perform effectively?</p>	<p>Brazil Brazil does not consider appropriate to maintain both expressions "certification/accreditation" as they are in the text once that certification body is different from accreditation body. The term "and" should be used for the maintenance of these two words, resulting in the following sentence: "certification and accreditation". The most important is exactly to know if who performs the vTPA assessments has the competence to do so.</p>
<p>5) If the accreditation arrangement does not adhere to IAF or ILAC, does the vTPA programme owner ensure that [certification/accreditation] certification/accreditation bodies have the capacity and competency to perform effectively?</p>	<p>Japan We agree with the text in square brackets. (Delete the square brackets.)</p>
<p>5) If the accreditation arrangement does not adhere to IAF or ILAC, does the vTPA programme owner ensure that [certification/accreditation] bodies have the capacity and competency to perform effectively?</p>	<p>New Zealand New Zealand supports retaining 'certification' and deleting 'accreditation'. The vTPA owner needs to ensure the 'certification' bodies are capable and competent if these are not accredited through IAF or ILAC.</p>
<p>5) If the accreditation arrangement does not adhere to IAF or ILAC, does the vTPA programme owner ensure that [certification/accreditation] certification/accreditation bodies have the capacity and competency to perform effectively?</p>	<p>Peru Delete square brackets.</p>
<p>5) If the accreditation arrangement does not adhere to IAF or ILAC, does the vTPA programme owner ensure that [certification/accreditation] certification/accreditation bodies have the capacity and competency to perform effectively?</p>	<p>Nicaragua Same as previous comment.</p>
<p><u>Accreditation of Certification Bodies</u></p>	

<p>We propose that this should be the first section. A vTPA programme with internationally recognized accreditation should increase a Competent Authority's trust at the moment of assessing these criteria.</p>	<p>Nicaragua</p>
<p>3) Does the Accreditation Body assess the certifying body using the relevant standards including for example ISO/IEC 17020 <u>ISO/IEC 17020</u>, ISO/IEC 17065 or ISO/IEC 17021-1 supplemented with ISO/TS 22003?</p>	<p>Indonesia Indonesia proposes to open the square-bracket.</p>
<p>3) Does the Accreditation Body assess the certifying body for example whether the certifying body complies with ISO/IEC 17020, ISO/IEC 17065, ISO/IEC 17021-1 and ISO/IEC 17011? Does the Accreditation Body assess the certifying body using the relevant standards including for example [ISO/IEC 17020], ISO/IEC 17065 or ISO/IEC 17021-1 supplemented with ISO/TS 22003?</p>	<p>Japan These four standards are relevant. ISO 17020 specifies requirements for the competence of bodies performing inspection. ISO 17011 Conformity assessment — Requirements for accreditation bodies accrediting conformity assessment bodies. ISO 17065 which is product certification. ISO 17021 which management system certification.</p>
<p>3) Does the Accreditation Body assess the certifying body using the relevant standards including for example [ISO/IEC 17020], ISO/IEC 17065 or ISO/IEC 17021-1 supplemented with ISO/TS 22003?</p>	<p>New Zealand New Zealand support reting the reference in [] and removing the brackets and also suggest amending the entire point as follows: 3) Does the accreditation Body assessment of the certifying body apply using the relevant standards including This is suggested to be clear that it is the accreditation process that needs to follow the relevant standard and not confuse the reader about who undertakes this.</p>
<p>3) Does the Accreditation Body assess the certifying body using the relevant standards including for example [ISO/IEC 17020], ISO/IEC 17065 or ISO/IEC 17021-1 supplemented with ISO/TS 22003 in accordance with the national legislation?</p>	<p>Colombia The standards mentioned as examples are voluntary in nature. Colombia already has regulations in place for the accreditation of certifying bodies. Therefore, the enforcement of national legislation must take precedence.</p>
<p>3) Does the Accreditation Body assess the certifying body using the relevant standards including for example ISO/IEC 17020 <u>ISO/IEC 17020</u>, ISO/IEC 17065 or ISO/IEC 17021-1 supplemented with ISO/TS 22003?</p>	<p>Peru</p>
<p>3) Does the Accreditation Body assess the certifying body using the relevant standards including for example ISO/IEC 17020 <u>ISO/IEC 17020</u>, ISO/IEC 17065 or ISO/IEC 17021-1 supplemented with ISO/TS 22003?</p>	<p>Nicaragua We support including the text between square brackets because the inspection scheme can generate relevant information for a competent authority. A national competent authority should not be restricted to using information from a scheme based on ISO/IEC 17020. Each competent authority should be able to assess the relevance of the information for the fulfilment of its objectives within the framework of the NFCS.</p>
<p>4) Is the certifying body accredited for the vTPA programme according to the relevant accreditation standard <u>national legislation</u>?</p>	<p>Colombia The standards mentioned as examples are voluntary in nature. Colombia already has regulations in place for the accreditation of certifying bodies.</p>

4) Is the certifying-conformity assessment body accredited for the vTPA programme according to the relevant accreditation standard?	Nicaragua We suggest using “conformity assessment”, a more generic term encompassing more activities than certification (see Note 1 to definition 2.1 in ISO/IEC 17000:2004).
Standard Setting Process	
1) Do the vTPA programme owners set their own standards or utilise national or international standards for assurance?	Peru Substitute a “v” for “V”. [<i>Translator’s note: The proposed amendment does not change the meaning of the text in English.</i>]
3) Have the vTPA standards been developed through a transparent consultative process with relevant experts <u>and stakeholders</u> reflecting the range of business processes within the target sector?	Nicaragua Good standardization practices stress the participation of the different parties who may directly or indirectly have a stake in the object to be standardized (see, e.g. ISO/IEC Guide 59:1998).
4) Are the vTPA standards open, transparent in governance and subject to continuous improvement by regular review to keep them up to date?	CCTA [<i>Translator’s note: The proposed amendment does not change the meaning of the text in English.</i>]
5) To what extent are the vTPA standards consistent with Codex or other relevant international standards and/or applicable national regulatory requirements?	Nicaragua We suggest moving this question to the second place, since it is linked with the first one.
6) Are-Do the vTPA standards written in a way establish technical requirements so that they can be assessed for conformance?	Nicaragua We suggest clearly including the term “technical requirement”, considering that an evaluation assesses the degree of compliance with the established requirements (see e.g. the definition of nonconformity in ISO 9000:2015).
Conformity Assessment	
1) Does the vTPA programme have written policies on frequency, methodology, announced and unannounced audits audits-audits /assessments and competency requirements for certification conformity assessment bodies?	Nicaragua We propose to use “conformity assessment”, a more generic term encompassing more activities than certification (see Note 1 to definition 2.1 in ISO/IEC 17000:2004).
2) Does the vTPA programme require a conformity assessment against the standard on a defined regular basis, e.g. annual audit of participating FBOs following an appropriate quality assurance framework?	CCTA ... following...: compare translation with the original in English, the meaning is not clear.
2) Does the vTPA programme require a conformity assessment against the standard on a defined regular basis, e.g. annual audit of participating FBOs following an appropriate quality assurance framework?	CCTA [<i>Translator’s note: The proposed amendment does not change the meaning of the text in English.</i>]
3) Does the vTPA programme have procedures in place to ensure that auditors have and maintain the required auditor competence the technical competence of the personnel involved in the assessment/audit process ?	Nicaragua We suggest amending the wording, since managing the technical competence of the personnel involved in the audit/assessment activities is essential for the programme’s credibility (see, e.g. 6.1.2 in ISO 17065).
Responses to Non-Conformance	
1) Do the vTPA programme arrangements include clearly defined procedures for dealing with non-conformities against the standards, failures to rectify non-conformities, and other situations where sanctions-sanctions related to the vTPA programme provisions might be required?	Nicaragua The purpose of the proposed amendment is to clarify that the sanctions being referred to here are not those applied by the competent authority.

Data Sharing and Information Exchange	
1) Is there an up-to-date list of participating FBOs (including their status) that are certified certified <u>certified, inspected</u> or verified as conforming to the vTPA standard, and is this information available to the competent authority? Is the information available in the public domain?	Nicaragua We suggest maintaining the link between these guidelines and ISO/IEC 17020.
4) Will the vTPA programme owner agree to notify the competent authority of any changes made to the vTPA programme, including but not limited to: the standard, governance, certification-audit, <u>inspection</u> and accreditation arrangements?	Nicaragua We suggest maintaining the link between these guidelines and ISO/IEC 17020.
6) If the data available is <u>in</u> electronic form are there adequate arrangements for maintaining the security of the data?	CCTA
6. <u>Are there any provisions related to the protection of documented information generated in the framework of the vTPA programme? If the data available is electronic form are there adequate arrangements for maintaining the security of the data?</u>	Nicaragua We suggest amending the wording, since documented information security provisions have to be established regardless of the medium containing the information (physical or electronic).
7. Does the vTPA owner have permission to share FBO data with competent authorities and is this in accordance with national data protection obligations?	Nicaragua [Translator's note: The proposed amendment does not change the meaning of the text in English.]
8) Does the vTPA owner have a protocol for data retention <u>in accordance with national legislation or internal provisions</u> ?	Nicaragua We suggest adding the last phrase. In most countries, information related to the NFCS objectives may be considered as data to be safeguarded, so the protocol needs to be aligned with the regulations of each country. If a country has no legal provisions on this subject, the protocol will have to be established following clear guidelines that are consistent with the nature of the information.
REGULATORY APPROACHES FOR THE USE OF vTPA INFORMATION/DATA	
<u>14. Where the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified. This section provides examples of necessary considerations and the practical uses that can be made by competent authorities of vTPA information/data to support their NFCS objectives.</u>	Japan We agree with the co-charis to lift the text from Principle 3 but we propose to put it before the existing introduction (para14).
14. This section provides examples of necessary <u>considerations</u> and the practical uses that can be made by competent authorities of vTPA information/data to support their NFCS objectives.	New Zealand New Zealand suggest that this paragraph is rewritten as follows: 14. The section sets out examples of the necessary process considerations and policy options competent authorities should take into account. This is suggested to give a clear introduction of what is contained in section G

<p>15. [Where the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.]</p>	<p>Brazil Brazil considers that text between squared brackets should be retained in the guideline. The establishment of a mechanism / process between competent authorities and vTPA in cases of significant public health risk or consumer deception can be a relevant tool to manage the food safety in the NFCS.</p>
<p>15. Where <u>Where</u> the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.†</p>	<p>Indonesia Indonesia proposes to open the square-bracket</p>
<p>15. [Where the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.]</p>	<p>Japan <u>This section provides examples of necessary considerations and the practical uses that can be made by competent authorities of vTPA information/data to support their NFCS objectives.</u></p>
<p>15. [Where the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.]</p>	<p>New Zealand New Zealand suggests that this current paragraph is deleted and replaced with the following: 15. This section also provides examples of the practical uses that can be made by competent authorities of vTPA information/data to support their NFCS objectives. This is suggested to give a clear introduction of what is contained in section G.</p>
<p>15. [Where the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.]</p>	<p>Colombia We agree with maintaining the text; however, for further clarity, the following should be deleted: “and indicates compliance”.</p>
<p>15. [Where the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism</p>	<p>Colombia We consider that responsibility for this task lies with the competent authority, since it is the latter that, as NFCS, has to handle sanitary non-compliances.</p>

/ process with the vTPA owner for information/data sharing and handling of non-compliance <u>information/data sharing</u> where failure to alert the competent authority of any significant public health risk or consumer deception is identified.]	
15. Where <u>Where</u> the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.}]	Peru Delete square brackets.
15. Where <u>Where</u> the competent authority has assessed vTPA arrangements and identified information/data that aligns and indicates compliance with relevant regulatory requirements and NFCS objectives, the competent authority may <u>should, with the prior consent of the FBO, the information/data owner,</u> establish a mechanism / process with the vTPA owner for information/data sharing and handling of non-compliance where failure to alert the competent authority of any significant public health risk or consumer deception is identified.}]	Nicaragua In the framework of a vTPA programme, the information/data is owned by the FBO, so authorization from the FBO is required for its exchange and use.
Process considerations	
a) A vTPA programme may be considered for use by a competent authority after an appropriate assessment of its credibility and credibility, <u>integrity and effectiveness</u> informed by the criteria in this guidance.	Canada Proposed edit. Assessment of the effectiveness of the vTPA programme elements that relate to regulatory requirements is as important as the credibility and integrity of the programme.
a) A vTPA programme <u>information/data</u> may be considered for use by a competent authority after an appropriate assessment of its credibility and integrity informed by the criteria in this guidance.	Nicaragua We propose this amendment for clarity and consistency with the structure and provisions of this document.
b) Competent authorities need only apply relevant assessment criteria commensurate with their intended use of vTPA information/data.	CCTA [Translator's note: The proposed amendment does not change the meaning of the text in English.]
c) Where there is a positive assessment outcome the competent authority may choose to enter into an arrangement with the vTPA owner by mutual consent <u>will proceed in accordance with the national legislation.</u>	Colombia
c) Where there is a positive assessment outcome the competent authority may choose to enter into an arrangement with the vTPA owner, <u>and with the FBO which owns the information/data to be used,</u> by mutual consent.	Nicaragua In the framework of a vTPA programme, the information/data is owned by the FBO, so authorization from the FBO is required for its exchange and use.
d) Competent authorities may need to establish transparent procedures to verify the reliability of the vTPA information/data that it intends using.	CCTA authorities... intend

d) Competent authorities may need to establish <u>should have</u> transparent procedures <u>in place</u> to verify the reliability of the vTPA information/data that it intends using.	Nicaragua Responsibility for meeting the NFCS objectives lies with the competent authority, so any third-party information used to assess an FBO's direct or indirect compliance should be based on transparent documented procedures.
e) Competent authorities may choose to set up regular meetings, or other communication channels, with the vTPA owner in order to analyse the information/data shared to look for trends and the competent authority may consider the need for any intervention needed.	CCTA compare comparable: repetition
e) Competent authorities may choose to set up regular meetings, or other communication channels, with the vTPA owner in order to analyse the information/data shared to look for trends and the competent authority may consider the need for any intervention needed.	CCTA need ... needed
f) Competent authorities may compare-contrast comparable regulatory audit data with that generated by the vTPA audits to verify consistency and reliability.	Peru
h) Where competent authorities choose-decide not to enter into an agreement with the vTPA owner they may access the information/data directly from the FBO.	Peru "Decide" is better for authorities; it is a more forceful term.
i) The competent authority should identify the information/data from the vTPA audits that is of most value to its NFCS objectives and agree the access arrangements for those elements. Key elements are identified in para 38 ("Data Sharing and Information Exchange" above).	Denmark Para 38 does not exist in this document must be F:13 "Data Sharing and Information Exchange"
i) The competent authority should identify the information/data from the vTPA audits that is of most value to its NFCS objectives and agree the access arrangements for those elements. Key elements are identified in para 38 ("Data Sharing and Information Exchange" above).	CCTA is or are?... elements. para(graph)
i) The competent authority should-may identify the information/data from the vTPA audits that is of most value to its NFCS objectives and agree the access arrangements for those elements. Key elements are identified in para 38 ("Data Sharing and Information Exchange" above).	Colombia This is considered an option, rather than an obligation, for the competent authority. In addition, it is necessary to revise paragraph 38, since it does not appear in the document.
i) The competent authority should identify the information/data from the vTPA audits that is of most value to its NFCS objectives and agree the access arrangements for those elements. Key elements are identified in para 38 ("Data Sharing and Information Exchange" above). <u>j. The competent authority may participate as an observer in a vTPA programme audit process. Under no circumstance should the competent authority issue any judgement or influence this process.</u>	Nicaragua We propose including this item, since a competent authority could request to participate in an audit process to collect information about the process carried out by a vTPA programme assessors/auditors. However, it is clearly stated that its participation is as an observer and that it should not influence the process developed by the vTPA programme.
Policy Options	
<u>Policy options</u>	Canada Canada would suggest deleting the title. The elements in that section are not policy "options". They are additional key considerations in regulatory

	approaches for the consideration of vTPA programmes.
a. In developing an appropriate approach to leverage the vTPA compliance information/data, competent authorities should ensure that the approach is consistent with international rights and obligations.	Canada Canada would recommend deleting this provision. It is not the role of Codex texts to remind countries of their international rights and obligations.
a. In developing an appropriate approach to leverage the vTPA compliance information/data, competent authorities should ensure that the approach is consistent with international rights and obligations.	Japan This content is not “policy option”. This is rather a principle and could be contained in para 11 D: Principles.
a. In developing an appropriate approach to leverage the vTPA compliance information/data, competent authorities should ensure that the approach is consistent with international rights and obligations.	Colombia We suggest deleting this item, since these are essential roles of the competent authority.
c. In order to validate the suitability of an assurance system, including a review of the vTPA requirements and its operation operation, the competent authority may consider the value of comparing the vTPA requirements with relevant international standards and/or relevant national regulatory requirements.	CCTA
e. Audit information/data generated by the vTPA programme, and FBO certification status may be used to inform NFCS planning leading to reduced intensity or frequency of regulatory inspection for participating FBOs. The information in (e), (f) and (i) is similar, so we suggest leaving only one paragraph.	Colombia
f. Competent authorities may reduce levels of official inspection where there is verification through their official data that participation in a vTPA programme is achieving higher levels of compliance with relevant regulatory requirements. The information in (e), (f) and (i) is similar, so we suggest leaving only one paragraph.	Colombia
h. vTPA information/data indicating a trend could be used to target specific interventions such as focused inspections or national training information training/information programs where the vTPA information/data helps identify a systemic issue.	CCTA
i. The competent authority may determine that FBOs participating in a vTPA programme that meet the relevant assessment criteria in these guidelines pose a lower food safety risk and so subject them to less frequent regulatory oversight.	Colombia The information in (e), (f) and (i) is similar, so we suggest leaving only one paragraph.
i. The competent authority may determine that FBOs participating in a vTPA programme that meet the relevant assessment criteria in these guidelines pose a lower food safety risk and so subject them to less frequent regulatory oversight.	Peru Better translation into Spanish. [<i>Translator’s note: The proposed amendment does not change the meaning of the text in English.</i>]
j. Competent authorities may use the additional information/data from vTPA audits to help prioritise regulatory resources to higher risk	Colombia We suggest deleting this item, since the way of prioritizing the highest risk areas is included in the

areas to better protect consumers in relation to food safety and fair practices in food trade.	Principles and Guidelines for National Food Control Systems (NFCS) (CXG 82-2013), mentioned in the Preamble.
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ANNEX II**Comments of Ecuador**

General comments

Ecuador would like to express its gratitude for the work done, and after conducting the relevant analysis of the “**DRAFT PRINCIPLES AND GUIDELINES FOR THE ASSESSMENT AND USE OF VOLUNTARY THIRD- PARTY ASSURANCE(vTPA)**”, Ecuador considers that the text of the entire document is well structured and aligned with the country’s technical criteria, and encourages the continuity of this work. Although the country does not have any substantial comments, we would like to submit the following editorial comments for consideration:

COMPETENT AUTHORITIES

- In (a), we suggest replacing the term “authorized” by **provided**.

Governance Arrangements

Relevant text:

2) Are the oversight arrangements structured to avoid potential conflicts of interest?

Proposed text:

2) Are the oversight arrangements structured ~~to avoid~~ **so that** potential conflicts of interest **may be avoided**?