

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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CL 2023/65/OCS-EXEC

August 2023

TO: Codex Contact Points
Contact Points of international organizations having observer status with Codex

FROM: Secretariat, Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme

SUBJECT: **Request for comments on the development of the Codex Strategic Plan 2026-2031 – Part 1 – how Codex works as part of the multilateral system on food and trade**

DEADLINE: 20 September 2023

BACKGROUND

1. CCEXEC84 agreed to initiate the development of a Strategic Plan 2026-2031 with immediate and ongoing engagement with the Codex membership during the drafting process.
2. The structure of the plan agreed by CCEXEC84¹ includes (i) a narrative of the drivers for change and (ii) a statement on how Codex will work, consistent with its statutory purpose of protecting the health of consumers and ensuring fair practices in the food trade, as part of the broader multilateral system on food and trade in addressing the challenges and opportunities posed by these drivers and within the resources available.
3. CCEXEC84 agreed that the section of the draft blueprint on the future of Codex that relates to context and drivers should form the basis for discussion of the narrative on drivers for change. This section is included here at Annex I.
4. CCEXEC84 also agreed that the Chairperson and Vice-Chairpersons should lead engagement with Codex Members and Observers, to explore the content of a statement on the role of Codex in addressing the challenges and opportunities posed by these drivers, including how it operates as part of the multilateral system for food and trade.

REQUEST FOR COMMENTS

5. As the first step in this programme of engagement, Members and Observers are invited to provide responses to the following questions, which are based on Annex I:
 - Codex standards, put in place for food safety, quality, and nutrition, may also contribute to other areas. In your view, how could Codex support “*the broader global goals around sustainability, one health, food security and environmental protection through the development of international food standards that address any potential issues for consumer health protection or fair trade practices arising from implementation of initiatives to advance sustainability interests*”? Where do you see particular priorities for Codex?
 - The Quadripartite One Health Joint Plan of Action² focuses on supporting and expanding capacities in six areas, including the assessment, management and communication of food safety risks. It also promotes multinational, multi-sector, multidisciplinary collaboration. What benefits might there be to Codex and its Members from such collaboration across the multilateral system for trade and food?

GUIDANCE ON THE PROVISION OF COMMENTS

6. Comments should be submitted through the Codex Contact Points of Codex Members and Observers using the OCS.
7. Contact Points of Codex Members and Observers may login to the OCS and access the document open for comments by selecting “Enter” in the “My reviews” page, available after login to the system.

¹ REP23/EXEC1

² The Quadripartite Organizations – the Food and Agriculture Organization of the United Nations (FAO), the United Nations Environment Programme (UNEP), the World Organisation for Animal Health (WOAH), and the World Health Organization (WHO) published the [One Health Joint Plan of Action](#) in 2022

8. Contact Points of Codex Members and Observers organizations are requested to provide general comments at the document level. Additional guidance on the OCS comment categories and types can be found in the OCS [Frequently Asked Questions \(FAQs\)](#).
9. Other OCS resources, including the user manual and short guide, can be found at the following link: <http://www.fao.org/fao-who-codexalimentarius/resources/ocs/en/>.
10. For questions on the OCS, please contact Codex-OCS@fao.org.

Codex standards of the future – context and drivers

The system for Codex standards elaboration has served well in the 60 years that Codex has been in existence. The system is anchored in the process described in the Procedural Manual (PM)ⁱ with the product being Codex standards, guidelines and codes of practice, commonly referred to as Codex texts. They contain requirements for food aimed at ensuring for the consumer a safe, wholesome food product free from adulteration, correctly labelled and presented. The scientific basis that underpins Codex texts is fundamental to ensuring that Codex maintains its pre-eminence as the international reference for food safety and fair practices in food trade, as well as the primary source of science-based food standards for many countries and recognized by the WTO.

As we move into the future, Codex can support the broader global goals around sustainability, one health, food security and environmental protection through the development of international food standards that address any potential issues for consumer health protection or fair trade practices arising from implementation of initiatives to advance sustainability interests.

Against this background, Codex standards need to be:

- i. relevant, fit for purpose and useful for Members ;
- ii. clear in their objectives;
- iii. responsive to the need for protecting the health of consumers and ensuring fair practices in food trade;
- iv. responsive to relevant evolving global challenges; and
- v. founded on scientific evidence

This section considers the current global context and challenges and how this could affect the type of Codex standards that may be needed in the future to protect the health of consumers and ensure fair practices in the food trade.

2.1 Emerging issues in food and feed safety

FAO and WHO have asked how Codex will approach issues related to new food sources and production systems (NFPS)ⁱⁱ.

The Commission mandated work to CCEXEC, which was addressed by a subcommittee of CCEXEC and considered by CAC45ⁱⁱⁱ. Codex Members were encouraged to submit new work proposals related to NFPS using existing mechanisms, and to identify possible issues that the current structure and procedures could not address and options to address them, which may require us to think afresh about the way in which Codex work is structured and operationalized. CCEXEC83 also recognized the need for guidance to be prepared on how to apply existing procedures to ensure that Members do not perceive procedural obstacles to submitting new proposals for work in this and other areas of Codex. The Codex Secretariat has been requested to draft practical guidance on how to apply existing procedures when developing new work proposals.^{iv}

In the meantime, discussions have begun in some committees on potential new areas of work. For example a side event in the margins of CCCF16 on “Foresight: Looking into emerging issues in food and feed safety” provided a valuable opportunity for forward looking discussion and prompted the committee to establish an agenda item which would allow them to regularly consider emerging issues. The importance of having a space within Codex meetings to discuss these new and emerging issues before committing to the development of new standards was identified as an important step in contributing to the vision that Codex can be a place where the world comes together to discuss food safety and quality standards to protect everyone, everywhere.

2.2 Global political, environmental, economic and health issues

Pandemics, social unrest, environmental (e.g. changes in climate, availability of clean water, natural disasters) and economic issues present global challenges. These impact both the nature of the work of Codex and the working modalities.

The COVID-19 pandemic has taught us that Codex needs to adapt its working model to be flexible and adaptive to remain resilient and ready to take on the global challenges in an effective way. Even before the pandemic, situations of social unrest had impacted the implementation of Codex meetings and started to bring attention to the need for investigation of different working modalities.

2.2.1 High level global initiatives

The UN Food Systems Summit (UNFSS) articulated the need to urgently deliver progress on all the 17 Sustainable Development Goals (SDGs), each of which relied on healthier, more sustainable and more equitable food systems, and further recognized the need to work together to transform the way the world

produces, consumes and thinks about food. Codex standards related to consumer health protection and ensuring fair practices in the food trade can facilitate the advancement of SDGs that are directly relevant to the work of Codex, in particular SDGs 2,3,12 and 17^v.

It should be noted that while developing and or reviewing standards, there are issues other than food safety, quality, that may also be taken into account. Nevertheless, when developing or revising standards the current procedures enable consideration of Other Legitimate Factors (OLFs) proposed by Members on a case by case basis where these are relevant to the protection of consumer health and ensuring fair practices in the food trade

FAO Council recently (December 2022) endorsed a set of Strategic Priorities for its work on food safety, which aims to maintain its vision to provide “*Safe food for all people at all times*” in the context of its mission “*To support Members in continuing to improve food safety at all levels by providing scientific advice and strengthening their food safety capacities for efficient, inclusive, resilient and sustainable agri-food systems.*” These Strategic Priorities encourage a more consistent integration of food safety in the development of sustainable and inclusive agri-food systems, food security and nutrition policies, and agriculture development strategies.

The seventy-fifth World Health Assembly (WHA) (May 2022) adopted a WHO Global strategy for food safety to serve as a blueprint and guidance for Member States in their efforts to strengthen their national food safety systems and promote regional and global cooperation. With five interlinked and mutually supportive strategic priorities, the strategy aims to build forward-looking, evidence-based, people-centred, and cost-effective food safety systems with coordinated governance and adequate infrastructures. Implementation of the strategy relies on the commitment and efforts of Member States, WHO, and the international community.

Both the FAO and WHO strategic directions on food safety acknowledge the importance of food safety systems, based on evidence and scientific advice, in achieving the SDGs. They also recognize its importance in responding to major global drivers ranging from environmental changes and digital advances to emerging hazards in the food chain and the approaches to mitigating these challenges, such as food system transformation and promotion of the One Health approach. The One Health joint plan of action (2022-2026)^{vi} of the Food and Agriculture Organization of the United Nations (FAO), the UN Environment Programme (UNEP), the World Health Organization (WHO) and the World Organisation for Animal Health (WOAH, founded as OIE) quadripartite also highlights the importance of a One Health approach to food safety.

The WTO, at the 12th Ministerial Conference, also acknowledged the centrality of Codex standard setting in the multilateral system in the context of emerging global challenges. The SPS declaration in paragraph 8 sets out an exploratory work programme to identify challenges in the implementation of the SPS Agreement and the mechanisms available to address them; and the impacts of emerging challenges on the application of the SPS Agreement. One theme for exploration is “*how to facilitate global food security and more sustainable food systems, including through sustainable growth and innovation in agricultural production and international trade, and through the use of international standards, guidelines, and recommendations developed by the Codex Alimentarius Commission, the World Organisation for Animal Health and the International Plant Protection Convention as the basis of harmonized SPS measures to protect human, animal or plant life or health.*”

The commitment to finding global or regional approaches and solutions to global challenges have been reiterated on several levels. For example, the Global Forum for Food and Agriculture Ministerial Conference on Food Systems Transformation; A Worldwide Response to Multiple Crises, in its final communique from the agriculture Ministers of 64 countries reiterated the importance of the multilateral tools in addressing global challenges. The Ministers committed “*to strengthen cross-sectoral collaboration in the transformation of food systems in line with the One Health approach. In this regard, we highlight the critical role of science-based international standard-setting organisations, such as the Codex Alimentarius Commission, the International Plant Protection Convention (IPPC) and the World Organisation for Animal Health (WOAH).*” Regional initiatives have also reiterated the role and value of Codex. For example, the establishment of the African Continental Free Trade Area referenced the Codex standards as the basis of harmonization across the region.

All these initiatives point to the importance of food safety for public health, food security and trade and the need to integrate foresight and preparedness to be prepared for the emerging issues to come. They further highlight that food safety has a critical role in the successful transformation of the agrifood system in order to meet the needs of the world. Codex is uniquely positioned as an enabler for all these initiatives by answering to the global needs to protect the health of consumers and the enabling of fair practices in trade, directly contributing to SDG goals 2 and 3.

2.2.2 Health, Fairness, and Sustainability

Recent discussions in CAC and elsewhere have drawn attention to the broad meaning of terms such as ‘health’ and ‘fairness’. The meaning of these are well understood as related to food safety and quality in the context of

Codex standard setting to 'protect the health of consumers and ensure fair practices in the food trade'. In broader contexts the terms 'health' and 'fairness' will naturally incorporate different aspects depending on the nature of the global initiative or the focus of the multilateral institution, for example, Codex standards, guidelines and codes of practice, should be implemented together with standards for other areas so as to have a holistic approach and address the synergistic impact of hazards from the diet, water, air and all sources when setting risk management measures.

In the context of sustainability, at the national or regional level risk management allows for informed decisions to be made to ensure that food is safe for consumption, nutritional requirements are met, food loss and waste is reduced and food is available for all. Different risk management approaches may be justified depending on how food is used and the extent and period of time for which it makes up part of the diet. It is recognized that Members may employ different approaches to achieve more sustainable food systems, each appropriately based for example on local or regional agricultural practices, climate, and culture, and that a singular methodology to achieving more sustainable food systems would not be applicable to all Members. Codex standards, guidelines and codes of practice can provide an enabling environment which facilitates the uptake and implementation of policies and programs to address the broader imperatives around climate change, environment and sustainability.

Codex standards, while put in place for food safety, quality, and nutrition, may contribute to other areas. For example:

- Codex has set higher mycotoxin MLs for foods for short term use to help ensure food availability in emergency situations and while practices to reduce mycotoxin contamination are still being implemented. Such approaches, with the commitment to review these after a clearly defined period, in addition to ensuring food delivery in emergency situations, also help reduce food waste.
- The *Codex General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) includes provisions for date marking. The clear distinction between "Use-by-date" (expiration date) and "Best-before-date" (Best Quality Before Date) may contribute to reduction of food waste.
- Codex has developed guidance to facilitate the use of electronic or paperless certification for food trade and guidance on the use of remote audit and verification in regulatory frameworks, which exemplifies how Codex is responding to new challenges in a rapidly evolving world.
- Adoption of the landmark texts on countering antimicrobial resistance and the guidelines that the Codex Committee on Food Hygiene has developed on safe use and reuse of water in food production and processing to help counter the impacts of water scarcity are other examples of how Codex is addressing emerging issues.

ⁱ Procedural Manual, 28th edition

ⁱⁱ CX/CAC 21/44/15 Add.1

ⁱⁱⁱ REP22/CAC, paras 23-31

^{iv} REP22/EXEC2 para 118iii

^v [Codex and the SDGs](#) and [Codex Strategic Plan 2020 -2025](#)

^{vi} [One health joint plan of action \(2022–2026\): working together for the health of humans, animals, plants and the environment](#), World Health Organization, Food and Agriculture Organization of the United Nations, World Organisation for Animal Health & United Nations Environment Programme