



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR NORTH AMERICA AND THE SOUTH WEST PACIFIC

14th Session, Port Vila, Vanuatu

19 – 22 Septembre 2016

USE OF CODEX STANDARDS IN THE REGION

(Prepared by the Codex Secretariat)

BACKGROUND

1. Information on the national use of Codex standards and related texts was collected in the past via a circular letter and the information was utilised as the basis for discussion in all Regional Coordinating Committee (RCC) meetings.
2. In FAO/WHO Coordinating Committee for North America and the South West Pacific (CCNASWP) and other RCCs the reply rates of the circular letter were generally low and answers rather unspecific. In addition, members often made oral reports during sessions, which further complicated the analysis and the preparation of meaningful conclusions on the overall picture. Replies to the question on the use and relevance of Codex standards and related texts (hereafter “Codex standards”) over the past five years have never exceeded 36 percent of the CCNASWP membership. In 2014¹ five out of a possible 14 members replied to the respective circular letter question and in 2012² only two countries provided information on their use of Codex standards.
3. After the discussion on the revitalization of the RCCs it was decided to terminate the use of the circular letter and to develop an enhanced system to continuously collect data online for all six Coordinating Committees. As an initial step towards a more systematic approach to the questions on the use of Codex standards and in an attempt to enhance the related data collection system, the Codex Secretariat developed a survey in cooperation with FAO and WHO for distribution to all RCCs. In the case of CCNASWP, the survey was sent out on 22 March 2016.
4. The survey was conducted online using the software SurveyMonkey, which allows for easier data analysis and representation. Members were given a period of two months to provide answers.
5. Given that questions on the general use of Codex standards had in the past not led to any comparable or representative data, it was decided to focus on specific standards that would be widely known and representative for their respective categories (i.e. numerical standards, general subject standards and general principles). Based on this assumption the survey covered:
 - i. The use of Maximum Residue Levels (MRLs) for pesticides in food and feed;
 - ii. The use of three general subject standards (Food Additives STAN 192-1995, Contaminants and Toxins in Food and Feed STAN193-1995, Labelling of Prepackaged Foods STAN 1-1985); and
 - iii. The use of General Principles of Food Hygiene (CAC/RCP 1-1969).

In addition, members were asked about difficulties related to the general use of Codex standards and they were informed that other specific standards could be covered in future rounds to build up over time a representative data set on the use of Codex texts worldwide.

¹ CL2014/19-NASWP

² CL2012/6-NASWP

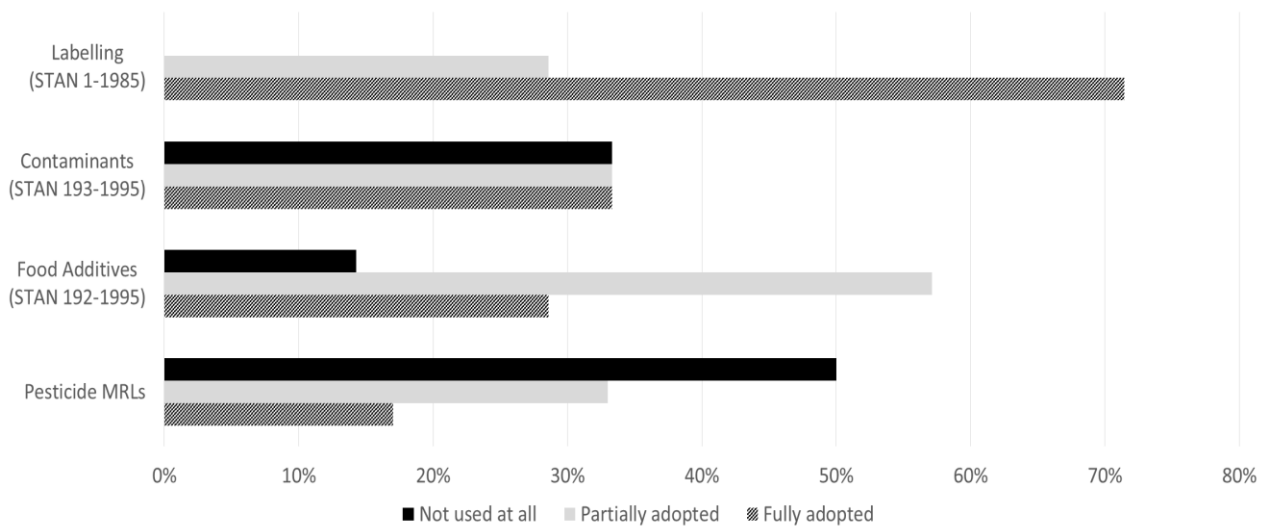
ANALYSIS AND DISCUSSION SURVEY RESULTS

6. The survey on the use of Codex standards obtained a response rate of 50 percent (7 countries) in the NASWP region (as of July 2016).
7. The full survey results can be found in Appendix I. A summary of the analysis is presented in the following.
- i. *Use of Codex MRLs for pesticides in food and feed:* With the exception of one country which fully adopts Codex MRLs, respondents stated not use Codex MRLs at all (40 %) or to use them only partially (29%) in their country. Some island states specified that the overall use of pesticides for their crops and feed was low or that still too little was known about the levels of pesticide usage. Other countries explained that they would take Codex MRLs into consideration when setting national limits.³
 - ii. *Use of the General Standard for Food Additives (Codex STAN 192-1995):* The technical content, structure and wording of the national regulation(s) are in two countries comparable to the international Codex standard or only contain minimal editorial changes for the regulated additives. The remaining respondents stated to have partially adopted the standard, which means that only parts of their national standards or regulations are identical with the Codex standard or that their national texts contain some technical deviations from what is stipulated in the Codex standard (e.g. for some additives). One respondent stated not to use the standard at all.
 - iii. *Use of General Standard for Contaminants and Toxins in Food and Feed (Codex STAN 193-1995):* The use of this standard is diverse in the region: 29 percent of respondents respectively fully adopted the standard, partially adopted the standard or do not use the standard at all.
 - iv. *General Standard for the Labelling of Pre-packaged Foods (Codex STAN 1-1985):* This standard is fully adopted by over 70 percent. The rest of respondents stated to have partially adopted the standard in their country, including one respondent who stressed that foreign language labels of imported food remain a problem.
 - v. *Use of General Principles of Food Hygiene:* All survey respondents have national legal requirements for good hygienic practices related to food and all but one country have aligned their legislation with the Codex General Principles of Food Hygiene (CAC/RCP 1-1969). While around 70 percent stated to also require the application of the Hazard Analysis and Critical Control Point (HACCP) system, only 40 percent align their respective legal requirements with Codex provisions (i.e. Annex 1 to CAC/RCP 1-1969). The remaining respondents have currently only optional or no implementation of the HACCP system in place.
 - vi. *Difficulties with regards to the use of Codex provisions:* Six members of the South West Pacific region have identified their biggest difficulties with regards to the use of Codex standards and related texts. These can be grouped as follows:⁴
 - (1) Too high resource investments combined with unavailability of local implementation capacity;
 - (2) Adaptation of international Codex standards to the national context/ Codex standards not sufficiently addressing national needs;
 - (3) Communication and awareness raising in multiple local languages;
 - (4) A lack of compliance with food safety laws in the food sector.
8. Respondents generally judged the survey as easy and well explained. However, one respondent recommended to differentiate questions for countries with an advanced status of food safety and quality regulation and countries that are less advanced in this area. With a response rate of 50 percent (including one country from North America and 6 countries from the South West Pacific), the survey results can be considered representative for the NASWP region.
9. Out of the surveyed Codex provisions, the general standard for labelling of pre-packaged foods and the general principles for food hygiene are most widely adopted in the region (see **Figure 2**). As far as the application of the HACCP system is concerned, 43 percent of respondents have aligned their legislation with Codex provisions. As regards the adoption of Codex provisions for pesticide MRLs, food additives, and contaminants and toxins in food and feed adaptation greatly varies in the region and no clear trend can be identified.

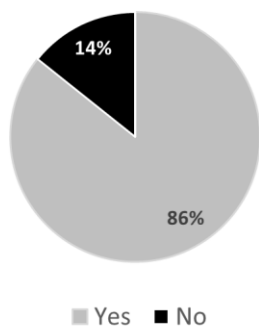
³ In addition, one respondent noted that APEC members recently adopted a guideline on possible approaches to achieve alignment of international MRLS developed by the APEC Food Safety Cooperation Forum. The primary benefit of this guidance is the development of a convergent regulatory approach, based on agreed principles that would allow economies to balance their regulatory needs with the goal of facilitating trade. Other important benefits include providing communication contacts with relevant APEC economy practitioners and increased opportunities for cooperation, collaboration and work sharing.

⁴ Point (1) is stated by more than one country, while points (2) – (4) are only stated by one county each.

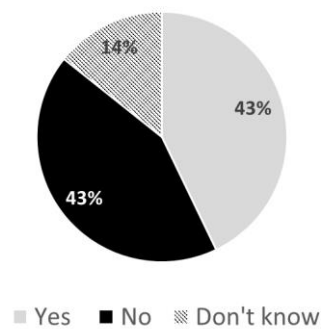
Figure 2: Use of Codex standards and related texts in NASWP



Legislative alignment with General Principles of Food Hygiene (CAC/RCP 1 -1969)



Legislative alignment with HACCP Annex 1 to CAC/RCP 1 - 1969



CONCLUSIONS AND RECCOMENDATIONS

Conclusion

11. The survey results indicate that in the NASWP region, the national food legislations of members are aligned to the Codex General Principles of Food Hygiene and legal requirements related to Good Hygienic Practices exist. The Codex standard for labelling of pre-packaged foods is widely adopted in region. However, in the South West Pacific there are varying degrees of adoption of other horizontal standards for contaminants and toxins in food and feed and for food additives as well as for MRLs for pesticides due to the prevailing local conditions.

Recommendation

12. The survey provides information that could support future national assessments and actions in the region. CCNASWP is requested to take note of the results of the survey and to provide inputs on the following questions that could guide future action by the Codex Secretariat in this area:

- (a) *Format and approach:* Are you satisfied with the design of the survey? Do you agree with the approach chosen and explained in paragraph 5?
- (b) *Use of the results:* Do you consider the results useful? If so, would you like to have the information stored online (i.e. embedded in the Codex website) providing an opportunity to update national information and review the information of other countries?
- (c) *Scope of next survey:* Which areas of Codex work would you like to see covered in future (if any)?

APPENDIX I – SURVEY QUESTIONS AND ANSWERS**Question 1. To what extent are Codex MRLs for pesticides in food and feed adopted in your country?**

Fully adopted	1
Partially adopted	2
Not used at all	3
Don't know	1
TOTAL	7

Question 2. Please use this field to provide any additional comments or explanations (max. 100 words).

There is very limited food production manufacturing in this country and use of pesticides is very limited. All pesticides used imported and we presumed they are in line with codex standards (MRLs).
We have the Food Law enacted but Pesticide Act is under review. Capacity development in the area of application of the food legislation is a priority. So (1) & (3) are ideally applied to some level in which Food Law covers Codex Standards.
Codex Standards are the default standards in our country's National Food Act 2014
The use of MRLs need to be fully discussed by the National Codex Committee to determined the MRLs for Food and Feed. We believe once do self assessment under CTF2 we then should be able to know how much pesticides are used and at what level. These pesticides are used in Plantation crops such as coffee, cocoa, oil palm and coconut plantations but not for food crops. Our food crop production is such that no chemicals are added as most farmers are smallholders. Most of our farming system are subsistence based and not semi-commercial to fully mechanized. We do not know who is regulating the import of chemicals.
The Agriculture and Livestock Division is the responsible authority for MRLs for pesticides in food and feed and according to their report, there is very little pesticide being used on the national level
Our Pest Management Regulatory Agency does not "adopt" Codex MRLs per se. However, when we establish MRLs, we do take into consideration the Codex MRL to determine whether we can align the MRLs where possible.
Our country takes Codex standards into account when developing its own regulation. Question 1 does not allow for this approach. APEC members recently adopted a guideline on possible approaches to achieve alignment of international MRLS. To assist in minimising such discrepancies and facilitate trade, while continuing to protect human health from potential pesticide risks, the APEC Food Safety Cooperation Forum has developed this guidance document on approaches to achieve alignment of MRLs for pesticides within APEC. The primary benefit of this guidance is the development of a convergent regulatory approach, based on agreed principles that would allow economies to balance their regulatory needs with the goal of facilitating trade. Other important benefits include providing communication contacts with relevant APEC economy practitioners and increased opportunities for cooperation, collaboration and work sharing. Our country has been a key leader in the development of this guideline.

Question 3. To what extent is the General Standard for Food Additives (CODEX STAN 192-1995) adopted in your country?

Fully adopted	2
Partially adopted	4
Not used at all	1
Don't know	0
TOTAL	7

Question 4. Please use this field to provide any additional comments or explanations (max. 100 words).

All manufactured food sold in the country are imported. Authorities always check to see that there is proper labelling and that additives are clearly stated.

We partially adopt CODEX STAN 192-1995 because only the people in the food industry or the hoteliers are in the better position to use food additives. The other food outlets does not bother about what types of food additives are to be added to enhance favouring effect. Also, in our country we are not fully aware of the system for food processing. We do not have downstream facilities to create awareness on how that certain food is produced.

There is no reference to the General Standard for Food Additives or its individual provisions in our legislation pertaining to food additives. However, the provisions of the GFSA are considered during the evaluation process when considering requests for new additive uses in our country (either new food additives or expanded conditions of use for already-permitted food additives).

Question 5. To what extent is the General Standard for Contaminants and Toxins in Food and Feed (CODEX STAN 193-1995) adopted in your country?

Fully adopted	2
Partially adopted	2
Not used at all	2
Don't know	1
TOTAL	7

Question 6. Please use this field to provide any additional comments or explanations (max. 100 words).

Our laboratories use their facilities to analyse for general contaminants and toxins. From our lab analysis then we should be able to determine what contaminants and toxins are prevalent in our country. The food contaminants and toxins need to be surveyed and see what is currently present in our country as a result of climate change.

There is no reference to the General Standards for Contaminants and Toxins in Food and Feed in national regulations or guidance documents that pertain to food contaminants. However, Codex maximum levels (MLs) for contaminants and toxins in food are generally considered by our authority when existing MLs are updated or when new national MLs are being established.

Question 7. To what extent is the General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985) adopted in your country?

Fully adopted	5
Partially adopted	2
Not used at all	0
Don't know	0
TOTAL	7

Question 8. Please use this field to provide any additional comments or explanations (max. 100 words).

All food sold in our country must have proper labelling under the Food Control Act.

Not all people in my country are not using labelling to buy food products. As soon as people see the cover they think the product is good so they buy it. It is important to create awareness to all people to at least read food labels before they buy from it. Another thing is the food imported has not always been in the appropriate language for us to understand. Instead of English is used in food labelling, some products are labelled in Chinese, etc. We are now ensuring that Codex Texts are included in our National Food Law and Regulations.

There is no reference to the General Standard for the Labelling of Prepackaged Foods in our legislation. The provisions of the GSLPF are considered when developing national legislation, guidance and polices.

Question 9. Do you have legal requirements for good hygienic practices (GHP) related to food in your country?

Yes	7
No	0
Don't know	0
TOTAL	7

Question 10. If yes, is your legislation aligned with the General Principles of Food Hygiene (CAC/RCP 1 -1969)?

Yes	6
No	1
Don't know	0
TOTAL	7

Question 11. Do you have legal requirements for the application of the Hazard Analysis and Critical Control Point (HACCP) system in your country?

Yes	5
No	1
Don't know	1
TOTAL	7

Question 12. If yes, is your legislation aligned with the HACCP system and guidelines for its application (Annex 1 to CAC/RCP1-1969)?

Yes	3
No	3
Don't know	1
TOTAL	7

Question 13. Please use this field to provide any additional comments or explanations (max. 100 words).

We are currently reviewing our Food Sanitation Act and Regulation. Once the Reviews are complete the Codex text on GHP and HACCP would be included. We will ensure to food coming into the country or going out of the country needs to comply with Codex texts and principles.

Requirements for GHP and/or HACCP are either in legislation or guidance, depending on commodities and applicable legislation.

Question 14. Where do you see the biggest difficulties with regards to the use of Codex standards and related texts?

Codex standards and texts are quiet complicated to understand unless one is working full time on codex issues. The biggest challenges is lack of local capacity and knowledge in the work of codex in all areas of codex.

Implementation of the Codex standards in particular the application of the standards i.e; lack of resources (as quoted above) too high resource investments deriving from their adoption, unavailable human resource skills for adequate implementation or standards and related texts not sufficiently responding to national needs.

Application of codex standards, e.g., MRLs for pesticides or food additives. Monitoring capacity is limited.

The issue of compliance of the food sector of our country but especially the General Hygiene is a challenge to local industries, food producers, retailers, etc. But the application of these standards to our huge food import is vital to national health, fair trade and economy.

The main area is the language and interpretation, most people do not read and write so when we talk to them they turn to forget very easily. Also, we speak so many different languages in my country and it's

very hard to communicate will all the people. We also need more funds to create awareness in the communities we live in.

Codex standards form an integral part of our food safety regulations and standard, however, its application/implementation is very low for most areas as there is a real need to understand the text as it should be implemented.

Question 15. Please use this field to provide any additional comments on the use of Codex standards and texts (max 100 words).

I would suggest your survey should be developed in a way where you can differentiate between countries that are very advanced with codex work in all aspects and those with little progress on codex work.

Codex international standards are critical for us due to our increasing food import to ensure food safety concerns and fair trade are complied with.

Since we do not have the capacity and resources we are strongly promoting Codex International Standards as a basis for our food trade to protect consumers health both domestically and internationally.

We base our domestic food standards and policies on Codex standards where those standards achieve our appropriate level of protection or fulfil a legitimate objective. This allows us to meet our obligations under the national Cabinet Directive on Regulatory Management to use relevant international standards as a basis for technical regulations and for conformity assessment procedures where they achieve the intended regulatory objective.

We take Codex standards into account when developing our own regulation. Survey Question 1 does not allow for this approach. APEC members recently adopted a guideline on possible approaches to achieve alignment of international MRLS. To assist in minimising such discrepancies and facilitate trade, while continuing to protect human health from potential pesticide risks, the APEC Food Safety Cooperation Forum has developed this guidance document on approaches to achieve alignment of MRLs for pesticides within APEC. The primary benefit of this guidance is the development of a convergent regulatory approach, based on agreed principles that would allow economies to balance their regulatory needs with the goal of facilitating trade. Other important benefits include providing communication contacts with relevant APEC economy practitioners and increased opportunities for cooperation, collaboration and work sharing. Our country has been a key leader in the development of this guideline

Question 16. Were the survey explanations and choices adequate for you to answer the survey questions? OPTIONAL

Yes	6
No	0
Don't know	0
TOTAL	6

Question 17. On a scale of 1- 5 how difficult was it for you to answer this survey (1 being very easy, 5 very difficult)? OPTIONAL

1	2	3	4	5	Total
1	1	3	1	0	6