

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
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World Health  
Organization

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**Agenda Item 4**

**CRD04x**

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

**Twenty-third Session**

**PROPOSED DRAFT GUIDANCE FOR MONITORING THE PERFORMANCE OF NATIONAL FOOD  
CONTROL SYSTEMS, AT STEP 5**

**Comments of European Union, Indonesia, Kenya, Philippines and Thailand**

**European Union**

The European Union and its Member States (EUMS) believe that the draft guidance will assist competent authorities in the assessment of the effectiveness of national food control systems and will facilitate its continuous improvement.

The EUMS support the text circulated for comments at step 6 without any further comments.

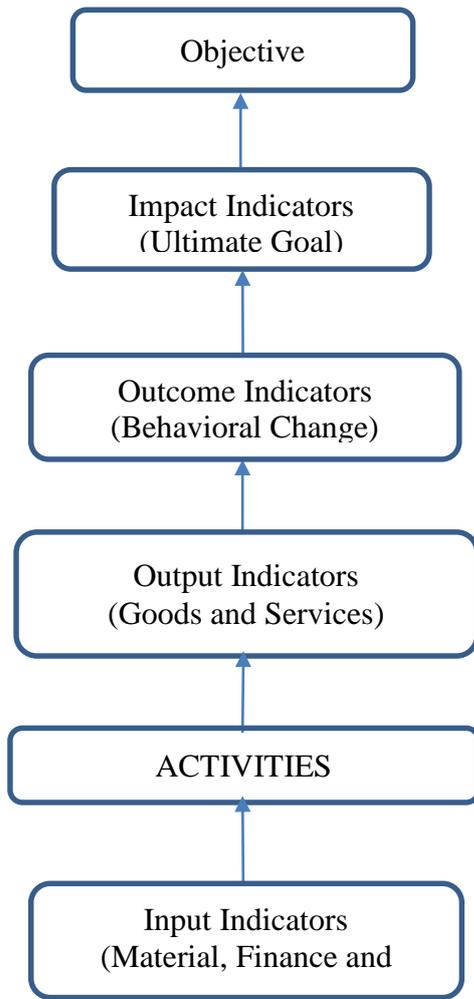
**Indonesia**

**General Comments**

Indonesia would like to thank the Committee for this work as the discussion for this proposed draft guidance could be forwarded to step 6. This allows for further consultation at the national level on the text of the document, with special focus on its feasibility of the proposed guidance for the implementation. Indonesia would like to use this opportunity to offer comments to this draft guidance, for better alignment with CAC GL 82/2013 and minimize the ambiguity of terms.

In this matter, the words “component” or “components” are used in many parts of the proposed draft, i.e. section 3. Definitions, para 1, 11, 17, 18, and 23; describing or having different meanings. Other terms such as “core elements”, “priority components”, “technical components” and “an integral component” are also used interchangeably with the term “components”. In order to avoid misunderstanding, Indonesia would like to propose that the intended meaning of those terms (core elements, priority components, technical components and an integral component) of the NFCS should be clearly defined.

Regarding the logical framework (Appendix A. Illustrative Example of a Simplified Outcome Framework), for better understanding of this guidance, we would like to propose the use of more widely and commonly used framework, as follows:



*Rationale:* The proposed framework in this draft guidance is relatively difficult to understand. Especially, the meaning of outcome is ambiguous and not clearly defined, and is differentiated to the different levels (the lowest level, lower level, the intermediate level, and the highest level). To make it simple and easier to understand, Indonesia would like to propose the logical framework commonly used by many international organizations (World Bank, Food and Agriculture Organization, etc.) to be used in the proposed guidance. Indonesia is of the view that the terms used should be familiar and the chart should be simplified to avoid misunderstanding.

### **Specific Comments**

We would like to submit our comments on the specific sections of the proposed draft, that are:

#### **SECTION 1 – INTRODUCTION**

**Paragraph 2** – Indonesia would like to insert “system” before “design” and “monitoring and system review” in line with the framework for the development of a national food control system in Principles and Guidelines for National Food Control System (CAC/GL 82-2013), as follows:

The policy setting, **system** design, implementation, **monitoring and system review** and other technical components of the NFCS should operate effectively over the course of time, and have the capacity and capability to undergo continuous improvement. As scientific and technical advances occur, it is important that the NFCS demonstrates its ability to adapt.

*Rationale:* to align the proposed draft guidance with Principles and Guidelines for National Food Control System (CAC/GL 82-2013).

**Step 2** – Indonesia would like to change the title of Step 2 in order to align with the proposed logical framework:

#### **STEP 2 - Define Outputs, Outcomes, Impacts, Objective to Monitor and Evaluate**

*Rationale:* to be consistent with the proposed logical framework.

#### **SECTION 5 - PERFORMANCE MONITORING FRAMEWORK FOR AN NFCS**

**Paragraph 29** – As the proposed logical framework previously, we propose to replace “outcome(s)” with “indicators”. This paragraph should be revised to read:

In addition to capturing what is to be achieved, ~~outcomes~~ **indicators** should follow SMART criteria.

- Specific: What exactly is going to be achieved?
- Measurable: Can the ~~outcome~~ **indicators** be measured through qualitative or quantitative indicators?
- Attainable: Is the ~~outcome~~ **indicators** in line with the competent authority’s competencies and authorities?
- Relevant: Will achieving an ~~outcome~~ **indicators** contribute to achieving the NFCS Objectives?
- Time-bound: Can a timescale be defined for achieving the ~~outcome~~ **indicators**?

*Rationale:* SMART criteria is criteria used to assess indicators.

**Paragraph 45** – Indonesia would like to propose this paragraph, as follows:

Indicators may be qualitative or quantitative **in addition to fulfilling a SMART criteria** and should ~~fulfil~~ consider the following criteria:

- unambiguous, easy to interpret, easy to monitor and transparent.
- ~~closely linked to the outcomes (including timing) and meaningful from an organisational perspective.~~
- ~~amenable to independent validation and or verification.~~
- Obtainable given available resources.

*Rationale:* to be aligned with Indonesia’s comment in paragraph 29. In addition, two criteria (bullets 2 and 3) are removed because they are not appropriate to assess indicators.

**Paragraph 48** – We propose that “a competent authority” should be replaced by “the NFCS” because monitoring and system review is conducted to assess performance of the NFCS. This paragraph is rewritten as below:

To ensure that indicators are successfully integrated into the monitoring and system review function of ~~a competent authority~~ **the NFCS**, a performance monitoring plan (PMP) should be created to provide detailed information on how performance data will be collected and analysed. For each indicator, the PMP should include:

*Rationale: We are of the view that the implementation of the monitoring and system review function should be consistently reflected in this document, as referring to the paragraph 3 which states that “the monitoring and system review of the NFCS”.*

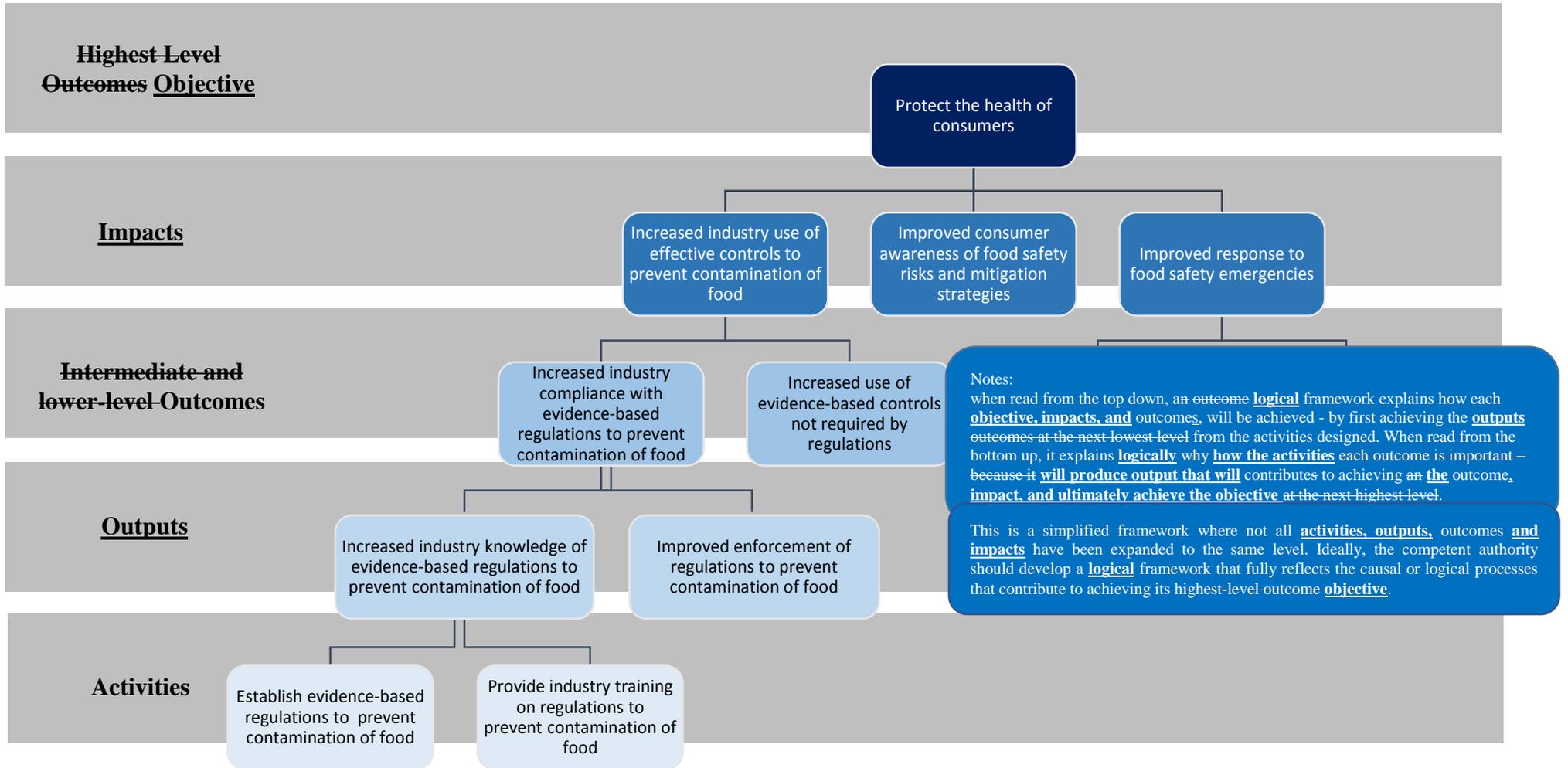
**Paragraph 56** - Indonesia would like to insert “system” before “design” in accordance with the framework for the development of a national food control system in Principles and Guidelines for National Food Control System (CAC/GL 82-2013).

Monitoring and system review is only useful if the findings are used to inform and influence the policy setting, system design and implementation of the NFCS. Simply reporting the data is not enough. The competent authority should institute approaches that will ensure the full integration of performance data. Some examples include:

*Rationale: to align the proposed draft guidance with Principles and Guidelines for National Food Control System (CAC/GL 82-2013).*

**Appendix A and Appendix B** – As mentioned previously in the General Comments, Indonesia would like to propose the change of wording which is in line with the proposed logical framework, as follows:

**APPENDIX A: ILLUSTRATIVE EXAMPLE OF A SIMPLIFIED LOGICAL OUTCOME FRAMEWORK OF MONITORING THE PERFORMANCE OF NFCS**



## APPENDIX B: ILLUSTRATIVE EXAMPLES OF INDICATORS FOR SELECTED OUTPUTS, OUTCOMES, IMPACTS AND OBJECTIVE

The following table provides illustrative examples of indicators for selected outputs, outcomes, impacts and objective from Appendix A. When applying the performance monitoring framework, each country will establish indicators specific to their desired outcomes.

Examples of <u>Outputs</u> , <u>Outcomes</u> , <u>Impacts</u> and <u>Objective</u> (taken from Appendix A)	Examples of Indicators
Protect the health of consumers ( <b><u>Objective</u></b> )	<ul style="list-style-type: none"> <li>• incidence of foodborne illness (# of cases per 100,000 population) (e.g., Salmonella)</li> <li>• average dietary exposure to chemical contaminants mg/kgbw per day (e.g., organophosphate pesticides)</li> </ul>
Increased industry use of effective controls to prevent contamination of food ( <b><u>Impact</u></b> )	<ul style="list-style-type: none"> <li>• percent of samples that test positive for microbial contaminants (e.g., Salmonella spp.)</li> <li>• percent of samples that test positive for chemical contaminants (e.g., organophosphate pesticide residues)</li> </ul>
<b><u>Improved response to food safety emergencies (Impact)</u></b>	<ul style="list-style-type: none"> <li>• <b><u>percent of recalled products that were recovered and destroyed or disposed of properly</u></b></li> <li>• <b><u>average response time between the recognition of a food safety concern and initiation of recall</u></b></li> </ul>
Increased industry compliance with evidence-based regulations to prevent contamination of food ( <b><u>Outcome</u></b> )	<ul style="list-style-type: none"> <li>• percent of farms using specified controls to prevent salmonella</li> <li>• percent of inspections for which food producers were found to be compliant with pesticide regulations</li> <li>• percent of inspections for which there is noncompliance by industry</li> </ul>
<b><u>Increased traceability of food products (Outcome)</u></b>	<ul style="list-style-type: none"> <li>• <b><u>existence of a food traceability tool/mechanisms (yes/no)</u></b></li> <li>• <b><u>percent of domestic food producers with traceability practices</u></b></li> <li>• <b><u>percent of imported foods that are tracked or registered using identifiers (e.g., barcodes, RFID)</u></b></li> </ul>
Increased industry knowledge of evidence-based regulations to prevent contamination of food ( <b><u>Output</u></b> )	<ul style="list-style-type: none"> <li>• percent of food producers that are aware of current evidence-based regulations</li> </ul>
<del>Improved response to food safety emergencies</del>	<ul style="list-style-type: none"> <li><del>• percent of recalled products that were recovered and destroyed or disposed of properly</del></li> <li><del>• average response time between the recognition of a food safety concern and initiation of recall</del></li> </ul>
<del>Increased traceability of food products</del>	<ul style="list-style-type: none"> <li><del>• existence of a food traceability tool/mechanisms (yes/no)</del></li> <li><del>• percent of domestic food producers with traceability practices</del></li> <li><del>• percent of imported foods that are tracked or registered using identifiers (e.g., barcodes, RFID)</del></li> </ul>

## Kenya

Kenya appreciates the progress made in the advancement of the draft standard. Kenya therefore approves the draft standard (principles and guidelines for monitoring performance of national food control systems.) for advancement to the next stage.

## Philippines

### General Comments

The Philippines congratulates CCFICS for the work and progress it has achieved in drafting a guidance document that will supplement CAC/GL 82-2013 (Principles and Guidelines for National Food Control Systems). Furthermore, we would like to submit the following comments:

- That the draft document should reflect the framework of an NFCS found in Section 4 of CAC/GL 82-2013; which include policy setting, system design, monitoring and system review and technical components
- That the document should make reference to 'performance monitoring and review framework' throughout the document to ensure consistency
- That the document should clarify whether it will refer to 'core elements' or 'components', and to make distinction between these terminologies as these are used interchangeably throughout the text
- That reference to the document as a 'guidance document or guide' be mentioned throughout the text

### Specific Comments

Title

To revise the title to reflect 'principles and guidelines'. The title to be revised as:

*"Draft Principles and ~~Guidance~~ Guidelines for Monitoring the Performance of National Food Control Systems"*

Section 1 – Introduction

Para 1

The objectives of the document should maintain its congruence with the objectives of Codex.

*"An effective national food control system (NFCS) is essential for ensuring the safety and suitability of food for consumers and ensuring fair practices in food trade...."*

When the word 'effective' is used in the document, it should refer to the ability of monitoring activities to provide the information on whether NFCS is able to achieve or address a legitimate objective. The content of the document should be consistent with the word 'effective'.

Para 2

To revise the 1<sup>st</sup> sentence to be consistent with the mother document (CAC/GL 82-2013)

*"The policy setting, system design, implementation, monitoring and system review, and technical components of the NFCS..."*

Para 3

To revise how the objectives of the NFCS was stated to ensure consistency with that of Codex.

*"The monitoring and system review function of the NFCS...effectiveness and appropriateness of the NFCS in achieving its objectives of ensuring food safety and ensuring fair practices in the food trade..."*

Para 5

Revision of the text

*"Many strategies for performance monitoring exist, but there is no specific guidance to performance monitoring and review framework for NFCS. This document seeks to fill the gap."*

Para 7

The steps as enumerated were further elucidation of where logical framework approach are used; as such, the text as it is currently written is being proposed to be revised to include the element of review.

*“This document describes a logical framework approach of planning, monitoring, and system review steps for performance monitoring and review of an NFCS and establishes a common understanding of performance monitoring and review principles, terminology and best practices.”*

Para 8

We propose revision of the text to reflect the intent of entire document, which refers to the step-by-step process in the conduct of monitoring and systems review.

*“The guidance is intended to assist countries in the conduct of support self-assessment of countries NFCS.”*

Para 9

As the current text poses contradiction with the previous statement, we would like to propose revision of the text.

*“This guidance focuses on planning-preparatory steps within the performance monitoring and review framework that establish a foundation for assessing the effectiveness of the NFCS...”*

Para 10

The fact that the whole document can serve as a guide should always be emphasized in the text. As such, we would like to propose the revision of the paragraph.

*“A competent authority can use this framework as guidance to implement monitoring and system review, or incorporate this approach to make existing processes more robust.”*

Section 3 – Definitions

Activity

To revise the definition of an activity to include its contribution to a specific outcome.

*“Actions taken or work performed through which inputs are mobilized to produce specific outputs or affect a certain outcome.”*

Effectiveness

We would like to propose inclusion of ‘projected outputs’ in the definition

*“The extent to which NFCS objectives, projected outputs, or related outcomes were achieved, or, are expected...”*

Inputs

Proposal to revise the text for clarity

*“The financial, human, technical and material resources needed and/or used for conduct of activities.”*

Outcome Outputs

Both intended effects of outcome and outputs might be categorized into immediate and long-term. We would like to propose that these be included in the definitions of both.

Section 4

Para 11

In order to further differentiate a phased approach against a targeted approach, we would like to provide additional parameters.

*“A targeted approach is application of performance monitoring to specific programs or components of the NFCS that are relevant to the achievement of a specific objective or outcome. A phased approach is a gradual expansion of performance monitoring framework as capacity within a country grows and that is composed of several components or programs implemented to the achievement of a number of objectives or outcomes.”*

Principle 3 – Efficiency and Reliability

Para 15

To revise the text to provide more clarity:

*“It should operate within the current capacity to address targets as identified prior to implementing a phased or targeted approach in order to remain practicable and affordable.”*

Section 5

Para 18

To include a provision on the interval of review and revisit of tasks within the performance monitoring framework.

*“The performance monitoring framework... Performance monitoring is an on-going process, where each step feeds into the next step in the cycle and will be revisited ~~over time~~ regularly following a prescribed period of time”.*

Para 19

The paragraph only mentioned identification of intended outcomes. What about outputs, as these are more immediate than outcomes? During the planning stage, the implementer should be able to also identify the outputs of particular activities, as these will contribute to the achievement of an outcome.

Para 21

In the 2<sup>nd</sup> sentence, it should be emphasized that the 1<sup>st</sup> step should be conducted prior to monitoring and system review. The proposed new wordings are as follows:

*“...The first step of the performance monitoring framework is to conduct an assessment to determine the competent authority’s current capacity prior to the conduct of ~~for~~ monitoring and system review. The following paragraphs may assist the competent authority in assessing their readiness to design and implement a monitoring and system review performance monitoring framework.”*

Para 48

We propose that the PMP should take into account historical data benchmarking, client demand, top management instructions and future trends.

Para 54

In the last sentence, we propose that it should include a feedback mechanism to the performers after the initial analysis of the data. We propose the new wording to the text: ....Depending on the nature of the indicators, data analysis may include comparing results to baselines and targets, assessing trends over time and feedback mechanism to the performers.

## Thailand

Thailand would like to express our appreciations for efforts of an Electronic Working Group led by the United States of America for preparing the Draft Guidance for Monitoring Performance of National Food Control Systems at Step 6.

Our comments on the on specific sections of document are as described below:

### **Specific comment**

- Section 5: Performance Monitoring Framework for an NFCS

- Paragraph 17

To be clear, additional explanations should be inserted to describe that countries could design performance monitoring in parallel with the elaboration of NFCS. So, this paragraph should be revised to read:

*“17. Countries should have established an NFCS or components of an NFCS prior to using this framework. **However, countries could possibly design performance monitoring in parallel with the development of a national food control system (NFCS).**”*

- Section 5.1: Planning Steps

### **•Step 1: Preparation**

- Paragraph 22

To clearly describe that three questions mentioned in this paragraph are given as an example, there could be additional questions, other than these questions, so “for example” should be added to the second sentence of this paragraph. The paragraph should then read:

*“22. Organizational commitment is essential.....component of the NFCS. The following questions, **for example**, can help the competent authority to assess the level of organizational commitment to monitoring and system review.”*

### **•Step 2: Define Outcomes to Monitor and Evaluate**

- Paragraph 29

To be clear that SMART criteria is one of examples or approaches could be conducted to achieve the outcome that contributes to achieving the NFCS objectives, “for example” should be added to the paragraph. So, this paragraph should read as follows:

*“29. In addition to capturing what is to be achieved, outcomes should follow, **for example** SMART criteria.”*

- Paragraph 34

To be proper, “lowest” should be replaced with “lower” and “highest” should be replaced with “higher”, so this paragraph should read:

*“34. Through this process, the competent authority will develop an outcome framework that visually reflects the causal or logical processes that contribute to achieving the ~~highest~~ **higher** -level outcome. When read from the top down, an outcome framework explains how each outcome will be achieved – by first achieving the outcomes at the next ~~lowest~~ **lower** level. When read from the bottom up, it explains why .....a simplified outcome framework.”*