



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

Twenty-third Session

DISCUSSION PAPER ON FOOD INTEGRITY AND FOOD AUTHENTICITY

Comments of El Salvador, European Union, Kenya, Thailand and Safe Supply of Affordable Food Everywhere

El Salvador

El Salvador agradece el documento remitido por la Secretaría del Codex.

El Salvador apoya lo citado en el párrafo **número 10** en el que se establece que: La adulteración económicamente motivada (AEM) afecta a una amplia gama de alimentos, tanto nacionales como importados, entre ellos, el zumo (jugo) y las frutas elaboradas, los productos de cacao, el café, el chocolate, los productos cárnicos y pesqueros, la miel y el aceite vegetal. Algunos ejemplos son los siguientes:

- La adulteración del aceite de oliva con aceites menos costosos.
- La venta de carne de caballo como carne vacuna.

El Salvador está de acuerdo con lo citado en el párrafo **número 14** en el que se establece que: El fraude alimentario también puede tener consecuencias para la salud y en la calidad nutricional de los alimentos. Por ejemplo, la dilución de los zumos (jugos) con agua y azúcar, o las declaraciones nutricionales falsas, tales como de bajo contenido de sal en alimentos con un alto contenido.

El Salvador apoya que se continúe con el Grupo de Trabajo para profundizar más en el tema.

European Union

The European Union and its Member States (EUMS) would like to thank Iran, Canada and the Netherlands for preparing a comprehensive analysis of issues surrounding food integrity and authenticity. These issues are of increasing global importance and it is therefore timely to consider if Codex should do more to tackle them.

As a starting point, the EUMS support the approach proposed in paragraph 28 of the discussion paper, in particular the full analysis of CCFICS texts to see if there are gaps that should be addressed with further guidance. It could also be useful to consult other committees although input from their side may be limited at this stage when it is not yet clear how CCFICS is going to address food fraud.

As indicated in the discussion paper, in principle most CCFICS texts already cover controls and prevention of food fraud and adulteration as their scope extends to the dual mandate of Codex, i.e. protecting the health of consumers and ensuring fair practices in food trade. However, and subject to further analysis of the existing texts, it may appear that there is a need for further guidance specifically addressing food fraud. Such guidance could contain recommendations on specific features of control systems that are necessary to effectively protect against food fraud, such as:

- A risk based analysis / approach to food fraud – i.e. consideration of which foods or types of products/practices are most at risk from fraud;
- Effective collection of intelligence;
- Good links between central and local level authorities to identify fraud;
- Networks with contact points across different countries to assist with cross border cases of fraud and spread knowledge/ experience; and
- Identification of suitable methods of analysis that are applicable to checking product's authenticity.

Kenya

Kenya proposes the following considerations for inclusion in the discussion paper;

1. There seems to be quite some emphasis on analytical methods. Not only are those just one amongst several mitigation avenues, but they also only address verification rather than prevention. Other mitigation options include e.g. audits at supplier sites, building stable relationships with suppliers, collaborative tools between industry & authorities to create transparency across the food value chain.
2. On page 3 point f) there seems to be a “criticism” of non-specific analytical test methods (suggested to lead to undetected frauds in majority of cases). This need to be clarified as in-fact, we are of the opinion that food fraud detection in the future will rely on the development & validation on non-targeted methods. Those methods will give an “authenticity profile” or “fingerprint” of what an authentic foodstuff should look like, rather than test for specific adulterants – after all, the problem with food fraud is that you are not aware of what exactly has been added (or removed).

Thailand

Thailand would like to express our appreciation for the efforts of Iran with assistance from Canada and Netherlands for preparing a Discussion Paper on Food Integrity and Food Authenticity (CX/FICS 17/23/5).

Our comments on the mentioned document are as follows:

General comments

We are of the opinion that food integrity and food authenticity is an important aspect, however it is considered difficult, complex and involves a range of stakeholders.

From our views, the consideration of food integrity and authenticity could be applied to:

1) Food Commodities (composition claims)

For food commodities, the consideration of integrity and authenticity are based on identified specifications and can be verified by the composition of individual commodity with laboratory analysis. The integrity and authenticity of food commodities (composition claims) should be addressed by a Commodity Committee depending on needs and technical feasibility information.

2) Production/processing process or origins of foods

The integrity and authenticity of a production/processing process or origins of foods generally cannot be verified by laboratory analysis. However, it can be addressed by implementing tools, including traceability/product tracing as well as inspection and certification systems.

Therefore, it is recommended to consider whether it is needed to develop specific guidelines or principles for food import and export inspection and certification systems to address the aspect on food integrity and authenticity in order to ensure fair practices and facilitate international trade.

Specific comments

●Integrated Codex Approach

- Paragraph 28

According to our general comments mentioned above, it appears that a number of existing CCFICS texts and other relevant Codex texts addressing the issue of food integrity and authenticity are currently available. The analysis of Codex texts should be, therefore, carried out in accordance with paragraph 28.

However, in order to have the effective and comprehensive identification of gaps of all relevant Codex texts, sub-paragraph i should be revised to read:

28. As noted in the Report of CCFICS22 (REP 16/FICS),....., the following approach is presented to CCFICS for consideration:

- i. carry out a full analysis of CCFICS texts **and other relevant Codex texts**, to identify those standards that should address food fraud, and if there are any gaps in the way food Integrity/Authenticity is covered in them.

Safe Supply Of Affordable Food Everywhere (SSAFE)

General Comments:

SSAFE would like to thank Iran, Canada and Netherlands for preparing this document. We do agree that the issue of food integrity/authenticity is a complex problem to tackle and thus this should be discussed at the level of Codex, with the aim of providing international guidance on this.

We support the need for guidance on how to assure the authenticity of food by minimizing vulnerability to, and mitigating the consequences of, food fraud. We should promote the use of the various Codex commodity committees to strengthen prevention (e.g. definition of adequate authenticity criteria covering food fraud possibility), detection (harmonized & validated methods), and verification.

We suggest focusing first on recognizing a typical management system approach for combatting economically motivated adulteration (EMA), similar to food safety management systems. The management system could have an evaluation step to characterize food fraud vulnerabilities (i.e. knowing materials and risks, current supply chain and existing control measures), followed by the design and continuous review of a mitigation strategy by means of **appropriate control measures** and their effective implementation. Mitigation strategy may include analytical surveillance, supplier audits, etc.

Specific comments:

1. There appears to be a strong emphasis on analytical methods to prevent fraud. Although we agree that analytical methods are amongst several mitigation techniques, they also only address verification rather than prevention. Other mitigation options such as on-site supplier audits, building strong relationships with suppliers, developing collaborative tools between industry and authorities to create transparency across the food value chain, etc. can also play a contributing factor to help prevent fraud.
2. On page 3 point f) there appears to be “criticism” of non-specific analytical test methods, suggesting that it leads to undetected fraud in a majority of cases. This needs to be clarified. SSAFE is of the opinion that food fraud detection in the future will rely a lot on the development and validation of non-targeted methods. Those methods will give an “authenticity profile” or “fingerprint” of what authentic foodstuffs should look like, rather than test for specific adulterants. After all, the problem with food fraud is that you are not aware of what has been added (or removed).