

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 6.1

CX/FICS 23/26/6 Add.1

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS (CCFICS)

Twenty-Sixth Session

Hobart, Tasmania, Australia

1 – 5 May 2023

PROPOSED DRAFT GUIDELINE ON THE PREVENTION AND CONTROL OF FOOD FRAUD

Comments in reply to CL 2023/11/OCS-FICS

Comments of Argentina, Canada, Chile, Colombia, Ecuador, El Salvador, European Union, Honduras, India, Iraq, Japan, Kenya, Malaysia, New Zealand, Norway, Peru, Republic of Korea, Saudi Arabia, Togo, United Republic of Tanzania, USA and Food Industry Asia, ICBA, ICUMSA, IDF/FIL

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/11/OCS-FICS issued in March 2022. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as **Annex I** and presented in table format.

ANNEX I

GENERAL COMMENTS	MEMBER / OBSERVER
India appreciate the work done by the eWG chaired by USA and Co-chaired by China, European Union, Islamic Public of Iran and United Kingdom.	India
Geographic Indicators are out of scope of CCFICS. CCFICS is not right place to discuss about GI.	Japan
ROK supports the development of guideline specific to food fraud that undermine protecting public health, and upholding fair practices in food trade perspectives.	Republic of Korea
<p>New Zealand thanks the chair and co-chairs for their leadership in preparing this proposed draft guideline and acknowledges the efforts that have been made to address the concerns of and include the suggestions from members of the EWG. While New Zealand supports the development of these guidelines, in line with the Project Document approved by CAC45, we remain concerned about the potential for increasingly complex and costly obligations and requirements to be imposed on both national competent authorities and business operators.</p> <p>New Zealand makes some specific comments and suggestions on the draft guideline with the objective of addressing these concerns.</p>	New Zealand
<p>The European Union and its Member States (EUMS) appreciate the active participation of Codex members in the work of the EWG on food fraud.</p> <p>The EUMS support the proposed draft guidelines as presented in Appendix 1 of document CX/FICS 23/26/6 with the following comments.</p>	European Union
Cependant, ce que nous n'avons pas trouvé et qui est revenu comme une interrogation est l'absence de " l'évaluation et la caractérisation de sans équivoque de Fraude alimentaire"	Togo
Tras revisar el documento el "Anteproyecto de directrices sobre la prevención y el control del fraude alimentario" que se encuentra en trámite 3, Ecuador no tiene observaciones. Sin embargo, Ecuador apoya a que se continúe avanzando el Anteproyecto ya que las observaciones remitidas al Apéndice 1, solicitadas por el GTE han sido consideradas.	Ecuador
Saudi Arabia support the proposed draft guidelines on the prevention and control of food fraud	Saudi Arabia
<p>Canada thanks the chairs for their work and notes that the draft document includes text that supports the objective of the work to allow countries to better manage risks caused by food fraud.</p> <p>Canada notes that some of the proposed text is duplicative of existing Codex guidelines and suggests that this text is removed from the document (as highlighted under specific comments), consistent with the direction agreed upon at CCFICS25 and included in the notes set out in paragraph 5 of the Introduction & Background section of the circular letter.</p>	Canada
Agree.	Iraq
Guidelines on the prevention , control and monitoring of food fraud.	United Republic of Tanzania
<p>Comentarios Generales:</p> <p>El Salvador agradece el documento remitido por la Secretaría del Codex Alimentarius y preparado por el Grupo de trabajo por medios electrónicos presidido por los Estados</p>	El Salvador

<p>Unidos de América y copresidido por China, el Reino Unido, la República Islámica de Irán y la Unión Europea.</p> <p>El Comité Técnico Nacional sobre Sistemas de Inspección y Certificación de Importaciones y Exportaciones de Alimentos, ha analizado la propuesta elaborada por el GTe, al respecto de las Orientaciones sobre la Prevención y el Control del Fraude Alimentario.</p> <p>A continuación, se presentan comentarios de carácter general para consideración del CCFICS26.</p> <p>Sección 1: Preámbulo / Introducción</p> <p>El Salvador está de acuerdo con los párrafos 1 y 4, tal cual se presentan en el proyecto de orientación.</p> <p>Sección 2: Finalidad/Ámbito de aplicación</p> <p>El Salvador está de acuerdo con los párrafos 9bis, 9bis.bis y la nota al pie de página de la sección 2, tal cual se presentan en el proyecto de orientación.</p> <p>Sección 3: Definiciones</p> <p>El Salvador está de acuerdo con las definiciones sobre: Fraude alimentario, Integridad alimentaria, Autenticidad alimentaria, Vulnerabilidad al fraude alimentario y Evaluación de la vulnerabilidad al fraude alimentario, como se plantean en el documento, según propuesta del GTe.</p> <p>Sección 4: Tipos de fraude alimentario</p> <p>El Salvador está de acuerdo con el párrafo introductorio de la sección 4, así como con la definición de Adulteración, Dilución y Tergiversación tal cual como se plantea en el documento, según propuesta del GTe.</p> <p>Sección 5: Principios</p> <p>El Salvador está de acuerdo con los principios 1 y 2 de la sección 5, tal cual como se plantean en el documento, según propuesta del GTe.</p>	
<p>FIA recommends advancing the proposed Draft Guidelines on the Prevention and Control of Food Fraud.</p>	<p>Food Industry Asia</p>

<p>SPECIFIC COMMENTS</p>	<p>MEMBER / OBSERVER</p>
<p>Section 1: Preamble / Introduction</p>	
<p>1. The increasing complexity of food systems and global trade in food makes food supply chains <u>potentially</u> more vulnerable to food fraud. Protecting the global food supply from intentional actions that undermine protection of public health and upholding fair practices in food trade are common goals for all stakeholders.</p> <p>New Zealand suggest that the first sentence should say ‘potentially’ makes food chains more vulnerable’</p> <p>Rationale: food fraud when it does occur is more often in a limited range of commodities.</p>	<p>New Zealand</p>
<p>2. Los incidentes de fraude alimentario pueden presentar riesgos a la salud pública y resultar en pérdidas económicas <u>y engaño</u> para el consumidor y otras partes interesadas, perturbación del comercio, daño a la reputación y ventajas económicas injustas.</p> <p>El Salvador propone agregar texto subrayado y en negrita, para indicar que los incidentes de fraude pueden ocasionar un engaño al consumidor.</p>	<p>El Salvador</p>

<p>3. Government oversight and good manufacturing practices by food business operators (FBOs) are important to protect public health, to limit the opportunity for food fraud and to maintain consumer confidence in the safety, authenticity, integrity, suitability¹, and quality of food.</p> <p>See Section 3 for rationale.</p>	<p>USA</p>
<p>3. Government oversight and good manufacturing practices by food business operators (FBOs) are important to protect public health, to limit the opportunity for food fraud and to maintain consumer confidence in the safety, authenticity, integrity, suitability⁴, and quality of food.</p> <p>Maintaining consumer confidence in all the aspects mentioned is what an NFCS is intended to do and that is covered by the next para, therefore the remainder of this sentence is redundant. Further the footnote of Sustainability is a very old definition of suitability which is no longer consistent with more modern understandings.</p>	<p>New Zealand</p>
<p>3. La supervisión gubernamental y las buenas prácticas de fabricación por parte de los operadores de empresas de alimentos (OEA) son importantes para proteger la salud pública, limitar las oportunidades para el fraude alimentario y para mantener la confianza del consumidor en la inocuidad, autenticidad, integridad, idoneidad¹ y calidad de los alimentos.</p> <p>El Salvador propone agregar el texto subrayado y en negrita (verbo “son”) para favorecer la comprensión del texto.</p>	<p>El Salvador</p>
<p>5. The prevention and control of food fraud is a shared responsibility, with, FBOs are responsible for producing safe and suitable food, and for presenting it in a manner so as not to deceive consumers. Thus, the FBOs should understand their supply chains and should have effective measures in place to detect, prevent, mitigate and control food fraud where appropriate.</p> <p>For clarity</p>	<p>USA</p>
<p>5. The prevention and control of food fraud is a shared responsibility, with FBOs are responsible for producing safe and suitable food, and for presenting it in a manner so as not to deceive consumers. Thus, the FBOs should understand their supply chains and should have effective measures in place to detect, prevent, mitigate and control food fraud where appropriate.</p> <p>The first suggested edit is meant to correct a typo.</p> <p>Canada suggests the removal of the second sentence of the paragraph in an effort to avoid too many repetitions (as this information is already covered in details in section 6 -roles and responsibilities, para 13.)</p>	<p>Canada</p>
<p>5. The prevention and control of food fraud is a shared responsibility, with <u>noting</u> FBOs are <u>primarily</u> responsible for producing <u>producing, transporting, storing and selling</u> safe and suitable food, and for presenting it in a manner so as not to deceive consumers. Thus, the FBOs should understand their supply chains and should have effective measures in place to detect, prevent, mitigate and control food fraud where appropriate.</p> <p>Rational: Edits suggested for clarity</p>	<p>New Zealand</p>
<p>5. The prevention and control of food fraud is a shared responsibility, with FBOs are <u>being</u> responsible for producing safe and suitable food, and for presenting it in a manner so as not to deceive consumers. Thus, the FBOs should understand their supply chains and should have effective measures in place to detect, prevent, mitigate and control food fraud where appropriate.</p> <p>ICBA recommends the replacement of the term “are” above with the term “being” for the sentence to read as follows: “The prevention and control of food fraud is a shared responsibility, with FBOs are being responsible for producing safe and suitable food...”</p>	<p>ICBA</p>

<p>Rationale: The amendment more accurately reflects the intent of what is being communicated.</p>	
<p>5. The prevention and control of food fraud is a shared responsibility, with FBOs are responsible for producing safe and suitable food, and for presenting it in a manner so as not to deceive consumers. Thus, the FBOs should understand their supply chains and should have effective measures in place to detect, prevent, mitigate and control food fraud where appropriate.</p> <p>Suggest removal for editorial purposes.</p>	Food Industry Asia
<p>5. The prevention and control of food fraud is a shared responsibility, with FBOs are responsible for producing safe and suitable food, and for presenting it in a manner so as not to deceive consumers. Thus, the FBOs should understand their supply chains and should have effective measures in place to detect, prevent, mitigate and control food fraud where appropriate.</p> <p>Suggest removal for editorial purposes.</p>	Food Industry Asia
<p>5. The prevention and control of food fraud is a shared responsibility, with as <u>FBOs are responsible have the primary role and responsibility for producing safe managing the food safety of their products and suitable food, for complying with requirements relating to those aspects of food under their control</u> and for presenting it in a manner so as not to deceive consumers. Thus, the FBOs should understand their supply chains and should have effective measures in place to detect, prevent, mitigate and control food fraud where appropriate. <u>Whilst Competent authorities have regulatory oversight responsibility and an important role in increasing awareness of food fraud prevention by building partnerships and collaborating with industry, academia, and other stakeholders to detect, prevent, mitigate and control food fraud.</u></p> <p>Would suggest either deleting "shared responsibility" and keep paragraphs 5 and 6 separate or combining 5 and 6 with the following amendments: "The prevention and control of food fraud is a shared responsibility, as FBOs have the primary role and responsibility for managing the food safety of their products and for complying with requirements relating to those aspects of food under their control (NFCS document para 13) - "and to present it in a manner so as not to deceive consumers" (from the text in this para 5). Whilst Competent Authorities have regulatory oversight responsibility and an important role in increasing awareness of food fraud prevention by building partnerships and collaborating with industry, academia, and other stakeholders to detect, prevent, mitigate and control food fraud.</p>	Norway
<p>5. La prevención y el control del fraude alimentario constituye una responsabilidad compartida. Los OEA tienen la responsabilidad de producir alimentos inocuos e idóneos y presentarlos de manera que no se engañe al consumidor. Por lo tanto Además, los OEA deben conocer sus cadenas de distribución y disponer de medidas eficaces para detectar, prevenir, mitigar y controlar el fraude alimentario, según proceda.</p> <p>El Salvador propone cambiar "por lo tanto" por "además", como se indica en texto tachado y en negrita a fin de enriquecer el sentido del párrafo.</p>	El Salvador
<p>5. La prevención y el control del fraude alimentario constituye una responsabilidad compartida. Los OEA tienen la responsabilidad de producir alimentos inocuos e idóneos y presentarlos de manera que no se engañe al consumidor. Los OEA tienen la responsabilidad de <u>producir alimentos inocuos e idóneos y presentarlos de manera que no se engañe al consumidor.</u> Por lo tanto, los OEA deben conocer sus cadenas de distribución y disponer de medidas eficaces para detectar, prevenir, mitigar y controlar el fraude alimentario, según proceda.</p> <p>Se sugiere la inclusión de "inducción a error" atento a que, tanto el engaño como la inducción a error al consumidor forman parte del concepto de fraude. De esta manera, se mantiene la coherencia con los Principios generales de la Norma General de Alimentos Preenvasados. Con el agregado propuesto, el texto rezaría:</p>	Argentina

"Los OEA tienen la responsabilidad de producir alimentos inocuos e idóneos y presentarlos de manera que no se engañe o induzca a error al consumidor."	
<p>6. Competent authorities have regulatory oversight responsibility and an important role in increasing awareness of food fraud prevention by building partnerships and collaborating with industry, academia, and other stakeholders to <u>better help FBOs detect, prevent, mitigate and control food fraud.</u></p> <p>This paragraph is confusing particularly given the preceding paragraph on FBOs. The key concept of competent authorities' role in "increasing awareness" is then confused with the addition of "detect, prevent, mitigate and control" at the end. New Zealand suggests that a specific reference back to FBO's is needed to provide clarity and keep the two roles separate.</p>	New Zealand
6. -May be deleted if included in 5.	Norway
<p>6. Incumbe Corresponde a las autoridades competentes la responsabilidad de la supervisión reglamentaria y tienen un papel importante en aumentar la concienciación sobre la prevención del fraude alimentario estableciendo relaciones de colaboración y cooperación con la industria, el sector académico y otras partes interesadas para detectar, prevenir, mitigar y controlar el fraude alimentario.</p> <p>El Salvador propone cambiar la palabra incumbe por "corresponde" para favorecer el sentido del párrafo y lo indicado en el mismo, según texto tachado y en negrita.</p>	El Salvador
<p>6. Se sugiere un cambio en la redacción para dar mayor claridad al texto, en los siguientes términos: "Incumbe a las autoridades competentes la responsabilidad de la supervisión reglamentaria. Asimismo, tienen un papel importante en aumentar la concienciación sobre la prevención del fraude alimentario a través del establecimiento de relaciones de colaboración y cooperación con la industria, el sector académico..."</p>	Argentina
<p>7. While several existing Codex texts address fraudulent activities and provide tools for Members wishing to detect, prevent, mitigate, and control such activity, a need for specific guidance <u>to address food fraud</u> was identified by Codex Members. [See Annex 1 for a list of existing Codex documents addressing food fraud.]</p> <p>Edit suggested for clarity and consistency with other paragraphs</p>	Canada
7. MY agrees to remove Annex 1 before the adoption of this proposed draft guideline	Malaysia
<p>7. New Zealand suggests this paragraph is deleted in its entirety – it is taken from the Project document to support the development of this guidance but is not necessary as part of the guideline once finalised. Further that existing Codex texts address food fraud is covered in Section 2 (para 9, last sentence) it is therefore not necessary to state this in the introduction.</p> <p>New Zealand agrees that the Annex should not be retain once the text is finalised.</p>	New Zealand
7. We find the Annex helpful, however it needs a sentence on the fact that other documents might be developed in the future, so the list would not be exhaustive.	Norway
<p>7. The EUMS suggest deleting paragraph 7'</p> <p>Rationale: The language of this paragraph would be appropriate for a discussion paper but not for Codex guidelines.</p>	European Union
7. Honduras sugiere que considere mantener el Anexo 1 como parte del documento para complementar información al usuario.	Honduras
7. Se sugiere eliminar el párrafo el punto 7, por estar contenido en el párrafo 9 actual.	Chile

<p>7. Aunque existen varios textos la Comisión del Codex Alimentarius ha establecido Normas y Textos Afines que abordan las actividades fraudulentas y proporcionan herramientas para ayudar a los miembros a detectar, prevenir, mitigar y controlar dichas actividades, los miembros del Codex identificaron. Ante los efectos del fraude alimentario en la inocuidad de los alimentos y el comercio internacional se identifico la necesidad de una orientación específica. [Véase el Anexo 1 con la lista de los actuales documentos del Codex referentes al fraude alimentario.]</p> <p>El Salvador propone la siguiente redacción para adecuar la redacción del párrafo 7 y guardar el mismo sentido de los demás párrafos del preámbulo. Según se indica en texto tachado y en negrita.</p>	<p>El Salvador</p>
<p>7. Se sugiere eliminar el Anexo 1 con la lista de los documentos de Codex referentes al fraude alimentario.</p>	<p>Argentina</p>
<p>8. MY agrees to remove Annex 2 before the adoption of this proposed draft guideline</p>	<p>Malaysia</p>
<p>8. Addition: "tools, strategies, and approaches" to detect, prevent, mitigate and control food fraud.</p>	<p>Republic of Korea</p>
<p>8. Work in the area of food fraud is widespread in with a range of international organizations, [some of which are noted in Annex 2] organizations involved. Countries may wish to consider work from these and other such organizations, as appropriate, when developing tools and strategies to detect, prevent, mitigate, and control food fraud.</p> <p>New Zealand agrees that the Annex is not necessary once the text is finalised and have suggested some edits to simplify and clarify the paragraph.</p>	<p>New Zealand</p>
<p>8. support deleting the annex as the list does not appear complete</p>	<p>Norway</p>
<p>8. Work in the area of food fraud is widespread in a range of international organizations, [some of which are noted in Annex 2]. Countries may wish to consider work from these and other organizations, as appropriate, when developing tools and strategies to detect, prevent, mitigate, and control food fraud.</p> <p>The EUMS support deleting the text in square brackets and Annex 2 from the final text.</p>	<p>European Union</p>
<p>8-Chile sugiere eliminar el párrafo del punto 8. No es una práctica común en el Codex incluir recomendaciones dentro de sus textos provenientes de organizaciones internacionales no multilaterales que no trabajan por consenso. En caso de que el Fraude Alimentario se convierta en un componente fundamental de los SNCA, ¿Cuál de esas recomendaciones sería la más apropiada? El párrafo no entrega una directriz ni información relevante para el gestor.</p>	<p>Chile</p>
<p>8. La labor en la esfera del fraude alimentario está ampliamente difundida en desarrollado por una serie de organizaciones internacionales [algunas se mencionan en el Anexo 2]. Los países podrán tener en cuenta los trabajos emprendidos por estas u otras organizaciones, cuando proceda, al formular herramientas y estrategias para detectar, prevenir, mitigar y controlar el fraude alimentario.</p> <p>El Salvador sugiere modificar el párrafo, cambiando la palabra difundida por "desarrollado", como se muestra el texto tachado y en negrita para favorecer la comprensión y sentido del párrafo.</p>	<p>El Salvador</p>
<p>8. Se sugiere eliminar el Anexo 2 antes de finalizar la directrices</p>	<p>Argentina</p>

Section 2: Purpose / Scope	
El objetivo debería ir en una sección independiente del ámbito de aplicación. Se considera que este documento debe llevar el mismo desarrollo de los demás documentos del Comité.	Colombia
<p>9. The purpose is to provide guidance to competent food safety authorities, other relevant agencies, and FBOs on the detection, prevention, mitigation and control of food fraud to help protect the health of consumers, and to ensure fair practices in food trade, including feed-animal feeding stuffs moving in international trade when relevant for food-producing animals. <u>protection of consumer health.</u> Aspects related to food fraud are already addressed through many existing Codex texts; this guidance is intended to support or supplement existing Codex texts by providing additional guidance specific to food fraud that can be considered within NFCS².</p> <p>For clarification, replace “including feed for food producing animals” with “including animal feeding stuffs moving in international trade when relevant for protection of consumer health” for consistency with Codex language.</p>	USA
<p>9. Comment: Kenya supports retention of footnote.</p> <p>Justification: Matters of intellectual property rights are diverse and may not fall in the jurisdiction of the NFCS.</p>	Kenya
<p>9. MY agrees the inclusion of footnote 2, to exclude issues of intellectual property from the scope of this proposed draft guideline.</p>	Malaysia
<p>9. strongly agree to keep the footnote(2) in the guideline as it helps to clarify of the scope.</p>	Republic of Korea
<p>9. The purpose is to provide guidance to competent food safety authorities, other relevant agencies, control authorities and FBOs on the detection, prevention, mitigation and control of food fraud to help protect the health of consumers, and to ensure fair practices in <u>the food trade, including feed for food-producing animals.</u> Aspects related to food fraud are already addressed through many existing Codex texts; this <u>This</u> guidance is intended to support or supplement existing Codex texts by providing additional guidance specific to food fraud that can be considered within NFCS².</p> <p>Replace ‘safety’ with ‘control’ to provide consistency with NFCS language. This guidance is only for the competent food control authorities and FBOs, extending to undefined ‘other relevant agencies’ potentially has Codex providing advice wider than intended or mandated.</p> <p>‘feed for food producing animals’ is included in the mandate of Codex as it related to protection of the health of consumer not as regards fair practices in the food trade. If it is considered necessary to include mention of ‘feed’ in this guidance then this may sit more comfortably as a footnote to the health of consumers.</p> <p>Footnote: New Zealand agrees that Geographical indicators should be specifically excluded from the scope of these guidelines. We do not consider this footnote is the best way to achieve this and would welcome further discussion of this during CCFICS26.</p>	New Zealand
<p>9. IDF strongly recommends the inclusion of footnote 2 in the document, removing the square brackets around the text. It is critically important a clear delineation of what is considered food fraud versus intellectual property, and the text clarifies that geographical indicators are out of scope.</p> <p>The purpose of the food fraud guidelines should be to prevent food fraud committed intentionally for economic gain and/or that could result in significant public health consequences, not to prevent the use of generic or commonly traded cheese names (e.g. gruyere, parmesan, feta).</p>	IDF/FIL

<p>9. Strongly suggest inclusion of footnote 2 as it clarifies that geographical indicators are out of scope. The purpose of the food fraud guidelines should be to prevent food fraud committed intentionally for economic gain and/or that could result in significant public health consequences.</p>	<p>Food Asia Industry</p>
<p>9. On the footnote: We do not agree with the interpretation of the Codex mandate and Codex labelling provisions as described here, and consequently we suggest deleting this footnote.</p>	<p>Norway</p>
<p>9. The purpose is to provide guidance to competent food safety authorities, <u>authorities and other relevant agencies, and FBOs,</u> on the detection, prevention, mitigation and control of food fraud to help protect the health of consumers, and to ensure fair practices in food trade, including feed for food producing animals. Aspects related to food fraud are already addressed through many existing Codex texts; this guidance is intended to support or supplement existing Codex texts by providing additional guidance specific to food fraud that can be considered within NFCS².</p> <p>We suggest deleting FBOs here, as it is our understanding that the purpose of the guideline is mainly to provide guidance to CA, and that no particular guidance is provided for FBOs. If the intention is to guide FBOs, we would suggest some text on this in section 7 "Relevant activities".</p>	<p>Norway</p>
<p>9. The EUMS oppose the inclusion of footnote 3. Rationale: False labelling of geographical indications of a food product is a deliberate action to deceive others to gain an unfair economic advantage. It is thus an act of food fraud and must be covered by the guidelines.</p>	<p>European Union</p>
<p>9. La finalidad es proporcionar orientación a las autoridades competentes en materia de inocuidad alimentaria, a otras agencias pertinentes y a los OEA sobre la detección, prevención, mitigación y control del fraude alimentario a fin de proteger la salud del consumidor y garantizar prácticas equitativas en el comercio de alimentos, incluidos los piensos para los animales destinados a la producción de alimentos. Muchos textos existentes del Codex abordan aspectos relacionados al fraude alimentario. Esta orientación directriz tiene el objetivo de respaldar o complementar los textos actuales del Codex-Codex, proporcionando una orientación adicional <u>orientaciones adicionales y específica específicas al fraude alimentario y que puede puedan considerarse en los SNCA. Por lo tanto, estas orientaciones deben ser leídas en conjunto con las siguientes normas: i) El código de ética para el comercio internacional de alimentos incluyendo transacciones en condiciones de favor y ayuda alimentaria (CXC 20-1979); ii) norma general para el etiquetado de los alimentos preenvasados (CXS 1-1985); iii) norma general para el etiquetado de aditivos alimentarios que se venden como tales (CXS 107-1981); iv) principios y directrices para los sistemas nacionales de control de los alimentos (CXG 82-2013); v) principios para la rastreabilidad/rastreo de productos como herramienta en el contexto de la inspección y certificación de alimentos (CXG 60-2006); vi) directrices para el diseño, elaboración, expedición y uso de certificados oficiales genéricos (CXG 38-2001); vii) principios y directrices para el intercambio de información entre países importadores y exportadores para respaldar el comercio de alimentos (CXG 89-2016); viii) directrices para el intercambio de información entre países sobre casos de rechazo de alimentos importados (CXG 25-1997); ix) principios y directrices para la evaluación y el uso de programas voluntarios de aseguramiento por parte de terceros (CXG 93-2021); x) principios y directrices para el intercambio de información en situaciones de emergencia relacionadas con la inocuidad de los alimentos (CXG 19-1995)."</u>²</p> <p>Chile sugiere separar el párrafo 9, creando un segundo párrafo con el texto que comienza con "Muchos textos existentes...", para indicar, lo referido a las normas Codex relacionadas. Para ese segundo párrafo, se propone un nuevo texto como el indicado.</p> <p>Además Chile apoya dejar la la nota de pie de página N°2, del punto 9, incluso, podría ser un punto adicional de la sección Ámbito de Aplicación. Es razonable dejar</p>	<p>Chile</p>

establecido que esta directriz no aborda la propiedad intelectual ni las indicadores geográficos y restricciones de etiquetado, pues no representan un riesgo para la salud pública..	
9. Se sugiere modificar la expresión muchos textos existentes del Codex abordan aspectos relacionados al fraude alimentario para incluir estos textos relacionándolos o que se suprima. Para mayor comprensión del documento se formula la propuesta de modificación	Colombia
9. La finalidad es proporcionar orientación a las autoridades competentes en materia de inocuidad alimentaria, a otras agencias pertinentes y a los OEA sobre la detección, prevención, mitigación y control del fraude alimentario a fin de proteger la salud del consumidor y garantizar prácticas equitativas en el comercio de alimentos, incluidos los piensos para los animales <u>que son</u> destinados a la producción de alimentos. Muchos textos existentes del Codex abordan aspectos relacionados al fraude alimentario. Esta orientación tiene el objetivo de respaldar o complementar los textos actuales del Codex proporcionando una orientación adicional y específica al fraude alimentario y que puede considerarse en los SNCA ² . El Salvador propone agregar texto subrayado y en negrita a fin de favorecer la comprensión del párrafo.	El Salvador
Note 2 •The United States strongly supports the inclusion of Footnote 2 or similar language in this document and removal of the square brackets. Issues of intellectual property, such as geographic indicators (GI) and related restrictions are not within the mandate of Codex/CCFICS and should not be addressed in this guideline, consistent with the direction previously provided by the Committee that the scope of the work should be limited to issues within the mandate of CCFICS. GIs are a very distinct category of labelling that already have a well-established legal framework for their protection and enforcement in various international agreements and are within the purview of other organizations (e.g., WIPO).	USA
Note 2 Comment: Delete this footnote. Rationale: Possibility of using Geographical Indicators (GI) Labelling as fraud for unfair economic advantage cannot be ruled out and therefore such issues fall within the ambit of definition of Food Fraud (as given in the document) and Misrepresentation (definition at Se. No. 5 in Section 4 Types of Food Fraud) i.e. claiming the characteristics that are not present. Therefore, it may not be appropriate to exclude such issues from the scope of the guideline.	India
Note 2 Honduras sugiere que se elimine esta nota al pié de página ya que es una excepción más del ámbito de aplicación.	Honduras
Note 2 Entendemos que esta nota debe permanecer en el texto de modo que se establezca con claridad que las cuestiones de PI, entre ellas el tema de las Indicaciones Geográficas, no quedan bajo ningún aspecto abarcadas por las presentes directrices. Los temas de PI exceden el mandato del Codex Alimentarius.	Argentina
9bis. [It should be noted that the investigation and prosecution of food fraud offenses may be dealt with under criminal law, which is outside the scope of this guideline.] Canada believes that this statement is not necessary and may cause confusion	Canada
9bis. Comment: 9bis and 9 bis.bis: Kenya proposes that 9bis and 9 bis.bis to be removed from the document or be captured as a footnote for information purposes. Justification: 9 bis and 9bis.bis is outside the scope of these guidelines	Kenya
9bis. Comment: The paragraph should be modified as "The investigation and prosecution of food fraud offenses is outside the scope of this guideline and need to be handled by the Countries as per their respective laws."	India

Rationale: This exclusion is required as the prosecution procedures may vary from country to country and may not fall in the domain of Codex. The text has been modified to bring more clarity.	
9bis. MY agrees to the inclusion of both 9bis and 9bis.bis, to exclude investigation and prosecution activities that is dealt with criminal law, as well as intentional adulteration related to food defense.	Malaysia
9bis. deletion: ',which is outside the scope of this guideline.	Republic of Korea
9bis. [It should be noted that the investigation and prosecution of food fraud offenses may be dealt with under criminal law, which is outside the scope of this guideline.] New Zealand supports the inclusion of this text and deletion of the square brackets. The sentence should be included in the current paragraph 9 it does not need to be a separate paragraph.	New Zealand
9bis. IDF supports retaining 9bis. Food fraud may be dealt with under criminal law anywhere it occurs. The value of 9bis is the establishment of a clear scoping statement in which the matters of law enforcement are beyond the scope of this guideline and codex itself.	IDF/FIL
9bis. [It should be noted that the investigation and prosecution of food fraud offenses may be dealt with under criminal law, which is outside the scope of this guideline.] The EUMS support retaining the text in square brackets as it is a useful clarification.	European Union
9bis Honduras sugiere que el ámbito de aplicación no incluya excepciones, únicamente lo que sea aplicable. Eliminar 9bis y 9 bis.bis	Honduras
9bis [Se debe destacar que las investigaciones y juicios referentes a las infracciones de fraude alimentario se contemplan según el derecho penal y están fuera del ámbito de estas directrices.] Se sugiere eliminar este texto. Las directrices y normas del Codex sirven a las autoridades sanitarias, que normalmente es una autoridad distinta a la autoridad judicial.	Chile
9bis.bis [Additionally, intentional adulteration, deliberate contamination of food in order to cause harm, harm is outside the scope of this guideline.]	USA
9bis.bis [Additionally, intentional adulteration, deliberate contamination of food in order to cause harm, is outside the scope of this guideline.] Canada believes that this statement is not necessary and may cause confusion.	Canada
9bis.bis Comment: Delete this paragraph. Rationale: Any intentional action which is capable of posing threat to consumer's health and fair trade practices will qualify as Food Fraud. 'Intention adulteration' or 'deliberate contamination' also qualify in the types (Section 4) 'Addition' as such substances may not be ordinarily present or present in that quantity in the food. The second part of the Paragraph 1 of the document "Protecting the global food supply from intentional actions that undermine protection of public health and upholding fair practices in food trade are common goals for all stakeholders." also highlight this	India
9bis.bis [Additionally, intentional adulteration, deliberate contamination of food in order to cause harm, is outside the scope of this guideline.]	New Zealand

New Zealand does not consider this additional statement is necessary and can be deleted. Rationale: The Purpose statement and the definitions already provide the necessary clarity.	
<p>9bis.bis [Additionally, intentional adulteration, deliberate contamination of food in order to cause harm, is outside the scope of this guideline.]</p> <p>The EUMS support retaining the text in square brackets as it is a useful clarification. However, the text should be reworded as follows: “Additionally, deliberate contamination of food in order to cause harm, is outside the scope of this guideline.”</p> <p>Rationale: To avoid confusion with “intentional adulteration for economic gain”.</p>	European Union
9bis.bis Se sugiere mantener este texto. El fundamento es que esta directriz no aborda dichos temas, pues no califican como fraude alimentario, según la definición de esta directriz, pues buscan un daño y no un lucro	Chile
Section 3: Definitions	
<p>General Comment on Definitions:</p> <p>Canada suggests that the definitions in the document be limited to only those terms that need to be defined to support the text that appears in the guidance. Everything else could remain as illustrative examples while the document is being drafted, but should be removed after the document advances past Step 5.</p>	Canada
Se desconoce la fuente u origen de las definiciones según los textos relacionados en el anexo 1 del documento. Es preciso conocer cuál de los documentos dio origen a las definiciones incluidas en el documento.	Colombia
<u>Fraude alimentario</u> : Se sugiere eliminar “a otros”, es innecesario.	Chile
<p>Food Integrity: The status of a food product in which it is not altered or modified with respect to expected characteristics, including food safety, quality, and nutrition.</p> <p>The definition of “Food integrity” is very broad and not specific to food fraud. Canada questions the purpose and value of this definition and would recommend its deletion.</p>	Canada
<p><u>Food Integrity</u>: The <u>unaltered</u> status of a food product in which it is not altered or modified with respect to expected characteristics, including <u>commercial or regulatory seals, food safety, quality, composition and nutrition</u>nutritional make up.</p> <p>Suggested edits for clarity and completeness</p>	New Zealand
<p>Food authenticity: Conformity between the food product characteristics and the corresponding information provided through food product labelling or other information associated with food trade.</p> <p>In Section 3 (under Paragraph 9 in Appendix 1 of CX/FICS 23/26/6) and throughout: delete the definition of “food authenticity” and the word “authenticity.” This concept is already appropriately addressed in the definition of food integrity and in the General Standard for the Labelling of Prepackaged Foods (GSLPF, CXS 1-1985), notably Section 3.1 and 3.2:</p> <ul style="list-style-type: none"> • 3.1 Prepackaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect. • 3.2 Prepackaged food shall not be described or presented on any label or in any labelling by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product. 	USA

<p>Food Fraud Vulnerability: Susceptibility or exposure due to a gap or deficiency that could place consumer health or fair trade at risk and/or have a negative impact on an FBO if not addressed.</p> <p>Canada notes that "food fraud vulnerability" appears only once, in the definition of "food fraud vulnerability assessment". Canada also notes that "Food Fraud Vulnerability Assessment" is no longer used in the document outside of the definition section. As such, Canada proposed to delete the definitions of "Food Fraud Vulnerability" and "Food Fraud Vulnerability Assessment"</p>	Canada
<p><u>Food Fraud Vulnerability:</u> Comment: This definition may be removed.</p> <p>Rationale: These definitions do not serve any specific purpose, particularly when this is a guideline document and food fraud is clearly defined.</p>	India
<p><u>Food Fraud Vulnerability:</u> This term is used only one location. Therefore, it is not necessary to include in the definition. It may add as a footnote at the first appearance.</p>	Japan
<p><u>Food Fraud Vulnerability:</u> These 2 terms (Food Fraud Vulnerability and Food Fraud Vulnerability Assessment) are not used in other part of the proposed draft guideline. MY suggest if these 2 terms are to be included, there should be more explanation including who should be using these tools in managing food fraud.</p>	Malaysia
<p>Food Fraud Vulnerability: Susceptibility or exposure due to a gap or deficiency that could place consumer health or fair trade an estimate of the probability and consequence of food fraud occurring at risk and/or have a negative impact on an FBO if not addressed.<u>Food Business.</u></p> <p>This definition needs to be stated in similar terms to risk e.g. an estimate of the probability and consequence of food fraud occurring at a Food Business. A currently drafted it is no different to a food hygiene control issue.</p>	New Zealand
<p><u>Vulnerabilidad al fraude alimentario:</u> Susceptibilidad o exposición debido a un vacío o deficiencia que pudiera plantear un riesgo a la salud del consumidor o al comercio equitativo o tener un efecto negativo en un OEA si no se abordara <u>equitativo.</u></p> <p>Se sugiere eliminar la última parte de este párrafo. La autoridad sanitaria no tiene como preocupación proteger a los OEA como tales.</p>	Chile
<p><u>Vulnerabilidad al fraude alimentario:</u> No resulta clara la definición. Se sugiere que la redacción comience de la siguiente manera: Susceptibilidad a ser expuesto a una situación de fraude alimentario debido a un vacío o deficiencia....</p>	Argentina
<p>Food Fraud Vulnerability Assessment: A documented process of collection and evaluation of information on potential food fraud risk factors and their likelihood of occurring, as well as control and mitigation measures which, when combined, determine the actual food fraud vulnerability.</p> <p>As stated above, Canada notes that the term "Food Fraud Vulnerability Assessment" is not used in the document. As such, Canada proposed to delete this definition</p>	Canada
<p><u>Food Fraud Vulnerability Assessment:</u> Comment: Kenya proposes deletion of the definition of Food Fraud Vulnerability Assessment.</p> <p>Justification: Food Fraud Vulnerability Assessment has not been used in the main text.</p>	Kenya
<p><u>Food Fraud Vulnerability Assessment:</u> Comment: This definition may be removed.</p> <p>Rationale: These definitions do not serve any specific purpose, particularly when this is a guideline document and food fraud is clearly defined.</p>	India
<p><u>Food Fraud Vulnerability Assessment:</u> Delete from definition.</p> <p>RATIONALE: This word is not used in this text and there is no need to define it.</p>	Japan

<p><u>Food Fraud Vulnerability Assessment</u>: A documented process of collection and evaluation of information on potential food fraud risk factors and their likelihood at a food business, including an estimate of occurring their probability and consequence, as well as which when combined with the control and mitigation measures which, when combined, determine in place provides an estimate of the actual FBO's food fraud vulnerability.</p> <p>Currently this term is not used – if this remains the case then the necessity of this definition should be reconsidered. If the term is used then New Zealand suggests some amendments to align this definition with that of Food Fraud Vulnerability – to clarify this is a documented analysis of the opportunities where food fraud potentially could occur at a FBO, including an estimate of their probability and consequence.</p>	<p>New Zealand</p>
<p><u>Evaluación de la vulnerabilidad al fraude alimentario</u>: Honduras sugiere que la definición describa que la evaluación debe realizarse en un OEA: Proceso documentado de recopilación y evaluación de información sobre los factores de riesgo de un fraude alimentario potencial y la posibilidad de que ocurra, así como también las medidas de control y mitigación que, al combinarse, determinan la vulnerabilidad real al fraude alimentario en un OEA.</p>	<p>Honduras</p>
<p><u>Evaluación de la vulnerabilidad al fraude alimentario</u>: No resulta clara esta definición.</p>	<p>Argentina</p>
<p>Section 4: Types of food fraud:</p>	
<p>The following section provides examples, when done intentionally for economic gain, of types of food fraud, noting this list is not all inclusive <u>exhaustive</u>.</p>	<p>Norway</p>
<p><u>Addition</u>: Adding an undeclared substance to food products that would not ordinarily be present, or present in that quantity, in the food</p> <p>Replace 'addition' to 'adulteration' as the word would confuse with good intent of 'addition' (such as food additives).</p>	<p>Republic of Korea</p>
<p><u>Addition</u>: Adding an undeclared substance to food products that would not ordinarily be present, or present in that quantity, in the food.</p> <p>Suggest addition of a full stop for editorial purposes.</p>	<p>Food Industry Asia</p>
<p><u>Adulteración</u>: Agregado de una sustancia no declarada <u>en el rótulo o ficha técnica</u> a productos alimenticios normalmente no presente, o presente en esa cantidad, en el alimento.</p> <p>Se sugiere agregar “en el rótulo o ficha técnica” para dar más precisión al texto.</p>	<p>Chile</p>
<p><u>Substitution</u>: Replacing an ingredient, or part of a food product, of high value with an <u>another</u> ingredient, or part of a product, of lower value <u>without declaring it</u>.</p> <p>For consistency with the other types of food fraud in section 4, the terms “high value” and “low value” should be removed from the definition of “substitution”, as the opening statement already covers the aspect of economic/value (“The following section provides examples, when done intentionally for economic gain, of types of food fraud,(...)”).</p>	<p>Canada</p>
<p><u>Substitution</u>: Replacing an ingredient, or part of a food product, of high value with an <u>a different</u> ingredient, or part of a product, of lower value.</p> <p>The references to ‘value’ should be deleted – it is the replacement that is the key component of substitution – the value of the replacement is not material to the action which is usually done ‘to gain an advantage’.</p>	<p>New Zealand</p>

<p><u>Sustitución:</u> Reemplazo de un ingrediente total o parte parcial de un producto alimenticio de alto valor con un ingrediente o parte de un producto de un alimenticio por otro de valor más bajo.</p> <p>Se sugiere modificar el texto, como se indica anteriormente, para mejorar comprensión.</p>	Chile
<p><u>Sustitución:</u> Reemplazo total o parcial de un ingrediente o parte de un producto alimenticio de alto valor con un ingrediente o parte de un producto de un valor más bajo.</p> <p>El Salvador propone modificar la definición como se presenta en texto subrayado y en negrita. Se considera necesario acotar que el remplazo de uno o varios ingredientes puede presentarse de manera total o parcial en los alimentos.</p>	El Salvador
<p><u>Sustitución:</u> Entendemos que no siempre la sustitución es por un ingrediente o producto de menor valor. Algunas veces esa sustitución obedece a cuestiones de escasez/falta del ingrediente requerido.</p>	Argentina
<p><u>Dilution:</u> Adding-Reducing the concentration of a material, such as water, to make component of the food below that represented through the addition of another ingredient present at a lower concentration than represented. - material.</p> <p>The core concept in the definition needs to be stated up front.</p>	New Zealand
<p><u>Counterfeiting:</u> Suggest adding examples: for instance the process of copying the brand name, packaging concept, processing methods, or document forgery including certification and/or mimicking authenticated symbol</p>	Republic of Korea
<p><u>Counterfeiting:</u> The process of making an imitation of food products, <u>that is not identified as such.</u></p> <p>For completeness – it is the failure to indicate that the product is an imitation that makes it a form of fraud.</p>	New Zealand
<p><u>Counterfeiting:</u> Supportive of this updated definition now having removed the word "exact".</p>	Food Industry Asia
<p><u>Misrepresentation:</u> Marketing or labelling food products as having characteristics in a manner that are not present <u>is false, misleading, or deceptive.</u></p> <p>Edit suggested for clarity and to include all potential scenarios (for example, situations where ingredients are not declared, such as added sugar in honey).</p>	Canada
<p><u>Misrepresentation:</u> Most misrepresentation are related to mislabelling or misbranding. It is more commonly understood as mislabelling - so 'mislabelling' is preferred.</p> <p>also, would be more helpful if it contains examples such as misrepresentation/mislabelling of country of origin or geographic indication.</p>	Republic of Korea
<p><u>Misrepresentation:</u> Marketing or labelling food products as having <u>a composition or characteristics that are not present.</u></p> <p>Composition and characteristics are different and both can be miss-represented.</p>	New Zealand
<p><u>Tergiversación:</u> Honduras sugiere agregar la palabra "ingredientes":</p> <p>Comercialización o etiquetado de productos alimenticios con características o ingredientes que no están presentes. Revisar traducción del inglés "misrepresentation"- tergiversación no es la mas apropiada para esta definición.</p>	Honduras
<p><u>Tergiversación:</u> Comercialización o etiquetado de productos alimenticios con características que no están presentes presentes en el alimento o que el rótulo o</p>	Chile

<p><u>publicidad contengan declaraciones ambiguas, falsas o que induzcan a error respecto de las características del producto alimenticio.</u></p> <p>Se sugiere modificar el texto, como se indica anteriormente, para mejorar comprensión.</p>	
<p><u>Concealment: Hiding or not disclosing information on the composition, safety, suitability, or low quality source of food ingredients or food products.</u></p> <p>For clarity and completeness.</p>	New Zealand
<p>SimulaciónEncubrimiento: Ocultación<u>Ocultación, simulación e o</u> falta de suministro de información sobre la inocuidad, la idoneidad o la baja calidad de los ingredientes o productos alimenticios.</p> <p>El Salvador considera que el termino apropiado para este tipo de fraude es "encubrimiento". Se propone realizar las modificaciones que se presentan a continuación en texto tachado, en negrita y subrayado.</p>	El Salvador
<p><u>Simulación:</u> Entendemos que estamos definiendo el término "Ocultación" y no "Simulación"</p>	Argentina
Section 5: Principles	
<p>10. Prevention<u>Detection, prevention, mitigation</u> and control of food fraud should be based on the following principles:</p> <p>We cannot see why detection and mitigation are excluded in this chapter. If detection and mitigation are not included, amendments should be made to paragraph 9 (purpose/scope).</p>	Norway
<p>Principle 1: Protection of Consumers <u>Food fraud reduces consumer confidence</u></p> <p>As drafted the title is not specifically relevant to food fraud.</p>	New Zealand
<p>National Food Control Systems to address food fraud should be in place include measures to protect the health of consumers detect, prevent, mitigate and to maintain consumer confidence in the safety control food fraud, integrity including surveillance, authenticity monitoring activities, suitability[etc.], in order to protect consumers and quality the integrity of food. the food supply chain</p> <p>Canada proposes that Principle 1, 2, and 3, be replaced with one concise principle to avoid duplication with existing text in the draft guidance itself and in CAC-GL 82-2013 (principles and guidelines for national food control systems).</p>	Canada
<p>Food fraud can result in reduced Systems to address food fraud should be in place to protect the health of consumers and to maintain consumer confidence in the safety, integrity, authenticity, suitability, and quality of food.</p> <p>As drafted this is not a statement of fact and so is not a true principle. Amendment are also suggested to separate actual food safety threat from consumer confidence as these are quite different concepts.</p>	New Zealand
<p>Principle 2: Protect the Integrity of the Food Supply Chain and Legitimate FBOs</p>	Canada
<p>Principle 2: Protect the Integrity of the Food Supply Chain <u>Detection and Legitimate FBOs prevention of food fraud</u></p> <p>Rewritten to clearly state what the relationship is to food fraud.</p>	New Zealand
<p>Food fraud controls and surveillance systems should be in place to protect the integrity of the entire food supply chain, which also helps to protect legitimate FBOs.</p>	Canada

Delete Principle 2 as it duplicates Principle 2 of CAC GL 82-2013 that already indicates that controls should be applied along the entire production chain.	
Appropriate Food fraud controls and surveillance systems should be operating across the food supply chain can assist in place to protect the integrity early detection and prevention of the entire food supply chain, which also helps to protect legitimate FBOs fraud. Redrafted as a statement of fact.	New Zealand
Principle 3: Legal Foundation	Canada
The government within each country should have in place an appropriate legal framework to address food fraud. Delete Principle 3 as it duplicates Principle 11 of CAC GL 82-2013 that already indicates that controls should be supported by a legal foundation.	Canada
The government within each country <u>overnment's</u> should have in place an appropriate legal framework to address food fraud. To simplify	New Zealand
Governs should ensure all relevant cCompetent ompetent authorities should operate in a coordinated, cooperative, and collaborative manner to detect, prevent, mitigate and control food fraud. For clarity and completeness. The key concept in this principle is the need for governments to ensure all of their relevant control authorities cooperate and coordinate – e.g. food control authorities and police etc - both domestically and when necessary internationally.	New Zealand
Principle 4 Les autorités compétentes devraient agir de manière coordonnée, coopérative et collaborative pour prévenir, détecter, atténuer et contrôler la fraude alimentaire.	Togo
Section 6: Roles and Responsibilities	
11. Is "as appropriate" needed in this section, esp. for paragraphs 11 and 12? When would it not be appropriate?	USA
11. Canada notes that the role of government (relevant government body) in this regard is already described in general high level terms that would include food fraud measures within the NFCS under principle 4 of CAC-GL 82-2013 ("13. The national government (and in some cases a competent authority) has the role and responsibility to establish and maintain up to date legal requirements. The competent authority has the responsibility to ensure the effective operation of the national food control system."). Therefore paragraph 11 is duplicative and not needed.	Canada
11. MY is of the view that earlier term 'national government' is more suitable and it has been used in other CCFICS text	Malaysia
11. A relevant governmental body has the role and responsibility to <u>Governments should, as appropriate appropriate to risk and the circumstances existing in their territories or associated with imports:</u> It is unclear who or what these 'relevant bodies' are. Essentially this section applies to "Governments" in general and it is clearer and simpler to just use the term 'Governments'. The phrase 'roles and responsibilities' is in the section title, repeating it multiple times is redundant and detracts from the core message trying to be conveyed. The additional words at the end introduce the important concept of taking a risk based approach and also to reflect and acknowledge the wide diversity of how different countries currently manage potential food fraud.	New Zealand

11. En algunas secciones del documento se menciona "autoridad competente pertinente", se sugiere armonizar la terminología.	Honduras
11 a. Establish or maintain legal structures and requirements to detect, prevent, mitigate and control food fraud	Canada
11 a. MY propose to use legal framework term to be consistent with Principle 3	Malaysia
11 a. Establish or maintain legal structures and requirements to detect, prevent, mitigate and control food fraud, <u>via their National Food Control System or other mechanism as enabled by their particular national circumstances.</u> For clarity and to reflect the wide diversity of how countries currently manage this issue.	New Zealand
11 b. Empower competent authorities to control, investigate and establish sanctions to deter and dissuade food fraud	Canada
12. The competent authorities have the role and responsibility to should , as appropriate appropriate to risk and the national circumstances: For clarity and consistency to align with our previous comment and suggested amendments, including the importance of a risk-based approach and avoiding overly prescriptive requirements that could impose additional and unnecessary costs on competent authorities where mechanisms are already in place.	New Zealand
12 a. D'assurer la mise en place et le maintien de programmes de supervision destinés à prévenir, détecter, atténuer et contrôler la fraude alimentaire.	Togo
12 b. Develop or maintain mechanisms/platforms to better detect food fraud. Canada suggests deleting para 12 bullet b as it is not clear what "mechanisms or platforms to better detect food fraud" are in practical terms and how they differ from the oversight programs mentioned in para 12.a.	Canada
12 b. Develop or maintain mechanisms/platforms <u>mechanisms</u> to better detect food fraud. It is not clear what a "platform" is and why it is different from the generic and broadly encompassing term "mechanism".	New Zealand
12 c. Build partnerships and collaborations with other governments <u>government bodies</u> , industry, academia and other stakeholders to combat food fraud.	USA
12 c. Comment: Kenya proposes 12c to read "Build partnerships and collaborations with relevant government authorities, industry, academia and other stakeholders to combat food fraud." Justification: This makes it clear that only relevant stakeholders are to be considered in collaborations. It also puts emphasis on the constitutional government authorities to be referred to in this context.	Kenya
12 c. De nouer des partenariats et favoriser la collaboration avec d'autres gouvernements, le secteur privé, <u>la société civile</u> , le monde universitaire et d'autres parties prenantes afin de lutter contre la fraude alimentaire.	Togo
12 d. Communicate with stakeholders and other government <u>competent</u> authorities, as needed. Edit suggested for consistency with other paragraphs.	Canada

e. Notify any potentially impacted countries when incidents of food fraud are identified or suspected.	New Zealand
13. MY suggest to use the term 'Food Business Operators (FBOs)'	Malaysia
13. FBOs have the role and responsibility to, as appropriate:	Malaysia
13. FBOs have the role and responsibility to <u>should</u> , as appropriate: For consistency with our previous comment and suggested amendments.	New Zealand
13 a. Produce safe and suitable food, and to present their food in a manner that is truthful and not deceptive to the consumers. Understand their supply chain and which products/ingredients/packaging in it may be susceptible to food fraud. Canada suggests adding a new bullet "a." to remind that FBOs are ultimately responsible for the food they produce.	Canada
13 b. [Have measures in place to mitigate the risk that the food products and ingredients are not authentic and ensure that the nature, safety, quality, and substance are accurately represented.] Canada suggests removing the square brackets. We believe it is important for this guidance to include recommendations for FBO to have measures in place to address food fraud risks. We also suggest deleting the following text "ensure that the nature, safety, quality and substance" to prevent having new terms introduced (such as "nature" and "substance").	Canada
13 b. Comment: Kenya proposes deletion of para 13b Justification: The has been elaborated well in para 13e and has covered main aspects of food fraud.	Kenya
13 b. [Have effective measures in place to mitigate the risk that the food products and ingredients are not authentic and as appropriate ensure that the nature, safety, quality, and substance are accurately represented.]	Malaysia
13 b. MY is of a view that a-e must be undertaken by the FBO to prevent and manage food fraud. As for mitigating the risk of not authentic food products and ingredients, we note that high value food products are more likely susceptible to food fraud and assurance of authenticity are not always possible for various reason. As such we propose some amendments as highlighted in the text.	Malaysia
13 b. This point is stated more succinctly in e). As drafted it was overly prescriptive and implies that all food businesses need controls in place, whereas such a requirements needs to be based on an assessment of risk. Noting also that this is just a roles and responsibilities section and should not get into too much detail on the "how".	New Zealand
13 b. [Have measures controls in place to mitigate the risk that the food products and ingredients are not authentic and ensure that the nature, safety, quality, and substance are accurately represented.] ICBA recommends replacing the term "measures" with "controls" in the statement shown above and throughout the document for consistency.	ICBA
13 b. Suggest removal as covered by point 13e.	Food Industry Asia
13 b. [Have Have measures in place to mitigate the risk that the food products and ingredients are not authentic and ensure that the nature, safety, quality, and substance are accurately represented.]	European Union

The EUMS support retaining the text in square brackets as it is a useful recommendation for reducing vulnerability for food fraud.	
<p>13 b. [Contar con medidas para mitigar el riesgo planteado por productos e ingredientes alimenticios no auténticos y asegurarse de que la naturaleza, inocuidad, calidad y sustancia se representan con precisión.]</p> <p>Se sugiere eliminar el texto de la letra b del número 13. La letra e lo contiene de mejor manera.</p>	Chile
13 c. Honduras sugiere modificar representar por "colocar en el mercado"	Honduras
13 c. Represent <u>Present</u> food for sale in a manner that does not deceive or mislead consumers.	Malaysia
<p>13 e. Take <u>Where an assessment indicates an unacceptable risk, take</u> reasonable precautions to detect, prevent, mitigate, and control food fraud.</p> <p>Additional text to maintain consistent with all Codex guidance that any recommendations for controls should be risk-based. A footnote reference could, if there is consensus, be included against 'assessment' to note that a food fraud vulnerability assessment may be a useful tool. New Zealand would not support text that implied that all food business need to use a specific tool to complete an assessment appropriate to the products and processes within their operation.</p>	New Zealand
<p>13 e. De prendre les précautions raisonnables pour détecter, prévenir, atténuer et contrôler la fraude alimentaire. f. <u>De mettre en place des mécanismes rapide et fonctionnel de retrait/rappel lorsque la fraude alimentaire est détectée.</u></p> <p>f. De mettre en place des mécanismes rapide et fonctionnel de retrait/rappel lorsque la fraude alimentaire est détectée.</p>	Togo
13 e. Honduras sugiere que se considere posiblemente unir con 13b? O que sean consecutivos en el mismo inciso.	Honduras
Section 7: Relevant Activities for Competent Authorities	
<p>14. Measures to detect, prevent, mitigate, and control food fraud incorporate aspects of food safety and quality, consumer protection, and ensuring fair practices in food trade, and so may should <u>[generally]</u> be addressed within the structure of a NFCS.</p> <p>Canada would like to suggest the use of "should" instead of "may", as it would be preferable (to prevent duplication, overlap and to enhance efficacy of control) that measures to address food fraud be integrated within a NFCS.</p>	Canada
<p>14. Measures. <u>Ensure</u> measures to detect, prevent, mitigate, and control food fraud <u>are risk based and</u> incorporate aspects of food safety and quality, consumer protection, and ensuring fair practices in food trade, and so may be addressed within the structure of a NFCS.</p> <p>MY propose editorial amendment and to merge with para 18 where competent authority should consider risk-based planning of measures. As such para 18 can be deleted.</p> <p>Ensure measures to detect, prevent, mitigate, and control food fraud are risk based and incorporate aspects of food safety and quality, consumer protection, and ensuring fair practices in food trade, and so may be addressed within the structure of a NFCS</p>	Malaysia
14. Measures to detect, prevent, mitigate, and control food fraud incorporate aspects of food safety and quality, consumer protection, and ensuring fair practices	New Zealand

<p>in food trade, and so may be addressed <u>incorporated and integrated</u> within the structure of a NFCS.</p> <p>To simplify and clarify as the current draft is quite confusing. It is not clear what is meant by “may incorporate aspects of”. Is this trying to say food fraud can variably impact ‘food safety, quality, consumer protection and ensuring fair practices in the food trade OR that those competent authority controls covering food safety and the other ‘aspects’ can also have an effect in detecting, preventing, mitigating and controlling food fraud? Further food control competent authorities arguably do not have a primary role in controlling quality and what is meant by consumer protection in this regard as compared to food safety and ensuring fair practices in the food trade?</p>	
<p>14. Les mesures visant à détecter, prévenir, détecter, <u>détecter, atténuer</u> et contrôler la fraude alimentaire intègrent des aspects de la sécurité sanitaire et de la qualité des aliments, de la protection des consommateurs et de la garantie de pratiques loyales dans le commerce des denrées alimentaires, et peuvent donc être abordées dans le cadre de la structure d'un SNCA.</p>	Togo
<p>14. Honduras sugiere que se considere incluir este párrafo en el preámbulo o introducción del documento</p>	Honduras
<p>15. Competent authorities may consider reviewing their NFCS and determine whether their system has an adequate [legal] [legislative] framework and appropriate policies and procedures to monitor, detect, prevent, control, and respond to food fraud incidents and strengthen fair trade. Such policies could include legal requirements, including sanctions, and responsibilities of the FBOs related to food integrity and authenticity<u>integrity</u>.</p> <p>See Section 3 comment</p>	USA
<p>15. Competent authorities may consider reviewing their NFCS and determine whether their system has an adequate [legal] [legislative] framework and appropriate policies and procedures to monitor, detect, prevent, control, and respond to food fraud incidents and strengthen fair trade. Such policies could include legal requirements, including sanctions, and responsibilities of the FBOs related to food integrity and authenticity. <u>15. Competent authorities should review their respective NFCS to determine whether its legislative framework, policies and procedures enable activities to monitor, detect, prevent and respond to food fraud incidents</u></p> <p>Alternate wording proposed for clarity. The terminology “legislative framework” is consistent with the wording used in CAC-GL82 “Principles and Guidelines for National Food Control Systems”</p>	Canada
<p>15. Comment: Kenya proposes that the word legislative should be replaced with legal.</p> <p>Justification: To be consistent with principle 3 section 5.</p>	Kenya
<p>15. MY can agree with legal framework</p>	Malaysia
<p>15. Competent authorities may consider reviewing their NFCS and determine whether their system has an adequate [legal] [legislative] framework and appropriate policies and procedures to monitor, detect, prevent, control, and respond to food fraud incidents and strengthen fair trade. Such policies could include legal requirements, including sanctions, and responsibilities of the FBOs related to food integrity and authenticity. _____</p> <p>Delete the whole paragraph. It is not appropriate for a guidance document such as this unless this recommendation is further qualified. Most food competent authorities administer legislation that strongly focuses on food safety risks. In doing this there are a number of cross over controls that should help deter and detect a variety of fraudulent practices. However, the justification for countries to promulgate new food</p>	New Zealand

legislation that focuses solely on food fraud and could divert significant resources away from promoting food safety has not been made.	
15. ICBA recommends use of the term “[legislative]” from the options provided to use language that could be considered inclusive for every category of FBO.	ICBA
15. Honduras apoya el concepto de marco legal	Honduras
15. Las autoridades competentes podrían considerar el examen de sus SNCA para determinar si el sistema tiene un adecuado marco legal legislativo y legal, normativas y procedimientos adecuados para monitorear para, detectar, prevenir, controlar, mitigar y responder a los incidentes de controlar el fraude alimentario y fortalecer el comercio equitativo. Dichas normativas podrían abarcar requisitos legales, incluidas las sanciones y las responsabilidades del OEA relacionadas a la integridad y autenticidad alimentaria. Se propone una mejora a la redacción del texto, como se indica. La fundamentación es que, por una parte, el párrafo usa dos expresiones que no se usan en otra parte del texto, como son "monitorear" y "responder un incidente de fraude alimentario", y tampoco usa el concepto "mitigar". Por otro lado, parece más apropiado a esta directriz hablar de fraude alimentario que "integridad y autenticidad".	Chile
16. Competent authorities may should consider establishing procedures to receive and evaluate reports of food fraud and determine appropriate follow-up, consistent with the food safety risk identified and national priorities. Canada is of the opinion that “should consider” better conveys the idea that the activities outlined in section 7 are actual recommendations for competent authorities to effectively prevent and control food fraud.	Canada
16. GENERAL COMMENT WITH RESPECT TO PARAGRAPHS 16-23. These are all examples of some proactive cooperative type of activities that Competent authorities may like to consider. As such they are examples and would potentially benefit from being placed in the same paragraph with an overarching chapeau and then these listed as ‘for example’ bullet points.	New Zealand
17. Honduras considera que la redacción de este párrafo parece mas un principio que una acción de las autoridades competentes.	Honduras
18. Japan proposes to delete this sentence. RATIONALE: It is well covered by para 17.	Japan
18. Competent authorities should where justified by risk consider including risk-based planning the application of measures more specific controls to detect and prevent food fraud. To improve clarity and use language that is more appropriate and consistent with the NFCS guidance.	New Zealand
18. Las autoridades competentes deberían considerar la inclusión de la planificación de medidas en base al riesgo para prevenir el fraude alimentario. Se sugiere eliminar la expresión “inclusión de la”, está demás ese texto.	Chile
19. Competent authorities may should consider establishing surveillance activities to detect food fraud. These activities could be conducted on a routine basis or in response to specific risk that has been identified. Canada is of the opinion that “should consider” better conveys the idea that the activities outlined in section 7 are actual recommendations for competent authorities to effectively prevent and control food fraud.	Canada

<p>20. Competent authorities may<u>should</u> consider providing practical guidance to FBOs and other stakeholders on how to address food fraud. Such guidance could include resources and access to tools on how to develop procedures to detect, prevent, mitigate, and control food fraud.</p> <p>Canada is of the opinion that “should consider” better conveys the idea that the activities outlined in section 7 are actual recommendations for competent authorities to effectively prevent and control food fraud.</p>	Canada
<p>20. What does "address" mean? It covers detect, prevent, mitigate and control?</p>	Japan
<p>20. Las autoridades competentes pueden considerar la provisión de orientación práctica a los OEA y otras partes interesadas sobre la manera de abordar el fraude alimentario. Dicha orientación podría incluir recursos y acceso a herramientas sobre cómo <u>evaluar la vulnerabilidad al fraude alimentario y elaborar procedimientos</u> para detectar, prevenir, mitigar y controlar el fraude alimentario.</p> <p>Se sugiere agregar el texto “evaluar la vulnerabilidad al fraude alimentario y”, como se indica. La fundamentación es que este es el primer paso que debe realizar un OEA para poder establecer si el alimento o los ingredientes que lo componen son susceptibles a fraude alimentario.</p>	Chile
<p>21. Competent authorities may<u>should</u> consider establishing appropriately secure communication channels with other governments, FBOs, academia, and other stakeholders to obtain information about situations involving food fraud and to share relevant knowledge, experience, and tools for combatting food fraud, such as food standards and analytical methods.</p> <p>Canada is of the opinion that “should consider” better conveys the idea that the activities outlined in section 7 are actual recommendations for competent authorities to effectively prevent and control food fraud.</p>	Canada
<p>21. Comment: Kenya proposes to replace ‘others’ with relevant and add ‘Authorities’ after the government to read “Competent authorities may consider establishing appropriately secure communication channels with relevant government authorities, FBOs, academia, and other stakeholders to obtain information about situations involving food fraud and to share relevant knowledge, experience, and tools for combatting food fraud, such as food standards and analytical methods.” Justification: This makes it clear that only relevant stakeholders are to be considered in collaborations. It also puts emphasis on the constitutional government authorities to be referred to in this context.</p>	Kenya
<p>21. What does "combatting" mean? What is difference from controlling food fraud?</p>	Japan
<p>21. Se sugiere eliminar este punto. Este tipo de prácticas no es habitual en las autoridades sanitarias, es más propio de procesos de investigación judicial.</p>	Chile
<p>21. It is unclear what is meant and whether it is appropriate for a Codex guideline. What is an “appropriately secure communication channel” with academia and ‘other stakeholders’? Is this talking about encryption or about communications exempt from wider freedom of information type disclosures? It would perhaps be better to clearly state the objective.</p> <p>New Zealand also suggests that a separate section to deal with international cooperation activities is considered.</p>	New Zealand
<p>21 bis. Comment: Kenya proposes to amend para 21 to read as follows “Competent authorities may consider establishing appropriately secure communication channels with other governments, FBOs, academia, whistle-blowers and other stakeholders to obtain information about situations involving food fraud and to share relevant knowledge, experience, and tools for combatting food fraud, such as food standards and analytical methods.” and delete para 21 bis.</p>	Kenya

Justification: Secure communication channels developed by competent authorities will promote the general protection of whistle-blowers since protecting an individual is outside their mandate.	
21 bis Competent authorities should consider developing tools to protect persons acting as “whistle-blowers” reporting such food fraud incidents.	New Zealand
22. If there is a potential for a food fraud incident to have an impact on food safety, the competent authority detecting the incident should immediately alert the relevant competent authority <u>authority(ies)</u> within their government if it is not the same organization. Could not be a single authority	Japan
22. If there is a potential for a food fraud incident to have an impact on food safety <u>the health of consumers</u> , the competent authority detecting the incident should immediately alert the relevant competent authority within their government if it is not the same organization. This is a more appropriate term for a Codex guideline.	New Zealand
23. Competent authorities may <u>should</u> consider establishing communication mechanisms for timely reporting to stakeholders about incidents involving food fraud, as appropriate. Canada is of the opinion that “should consider” better conveys the idea that the activities outlined in section 7 are actual recommendations for competent authorities to effectively prevent and control food fraud.	Canada
22. Si hubiera una posibilidad de que un incidente de fraude alimentario tuviera una repercusión sobre la inocuidad alimentaria, la autoridad competente que detecte el incidente debe notificar de inmediato a la autoridad competente del gobierno <u>competente</u> , si no pertenecieran a la misma organización. Se sugiere eliminar las expresiones “competente” y “del gobierno”. Se adapta mejor a las distintas estructuras de los países.	Chile
Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities	
Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities The U.S. is fine with Collaboration	USA
Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities Based on the Webster dictionary definitions, the term cooperate would be more suitable (Cooperate - 1 : to act or work with another or others : act together or in compliance ; 2 : to associate with another or others for mutual benefit. Collaborate – 1 : to work jointly with others or together especially in an intellectual endeavor ; 2 : to cooperate with or willingly assist an enemy of one's country and especially an occupying force ; 3 : to cooperate with an agency or instrumentality with which one is not immediately connected)	Canada
Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities Comment: Kenya proposes that the title should include cooperation and collaboration and read, ‘Cooperation, Collaboration and exchange of information between competent authorities. Justification: Competent Authorities may decide to either cooperate and/or collaborate depending on the task.	Kenya

<p>Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities</p> <p>Comments: The title may be modified as "Section 8: Cooperation and exchange of information between competent authorities."</p> <p>Rationale: Cooperation between competent authorities is more proper in such circumstances particularly when we are considering that prosecution is beyond the scope of the guidelines and need to be handled by respective country as per its law. Different legal situations/options in countries may not allow collaboration in this area. Collaboration is generally used in the situation of shared ownership.</p>	India
<p>Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities</p> <p>Japan prefers the term "Collaboration".</p> <p>RATIONALE: It is about working with others to produce something together and achieve shared goals.</p>	Japan
<p>Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities</p> <p>Why are cooperation and collaboration in []? Only collaborate is in [] in the following text</p>	ICUMSA
<p>Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities</p> <p>MY can agree with 'Cooperation'.</p>	Malaysia
<p>Section 8: [Cooperation] [Collaboration] <u>Cooperation, Collaboration</u> and exchange of information between competent authorities</p> <p>All three terms are appropriate as the specific form of engagement between competence authorities will depend on the circumstances and if a particular incident or event has domestic / in-country implications or international / export implication or both.</p>	New Zealand
<p>Section 8: [Cooperation] [Collaboration] and exchange of information between competent authorities</p> <p>ICBA selects the term "[Collaboration]" within the title of Section 8, from the options provided.</p> <p>Rationale: The use of the term "collaboration" is stronger in meaning and context than "cooperation" and can be considered more insistent in encouraging competent authorities to action.</p>	ICBA
<p>23. Se sugiere eliminar este párrafo, puesto que la comunicación a las partes interesadas está en el ámbito de la Comunicación de Riesgo, y está indicado en otras normas Codex.</p>	Chile
<p>24. Competent authorities should cooperate collaborate and exchange information with the <u>with other</u> relevant competent authorities in situations where food fraud is suspected or identified. This exchange of information could be expanded when there is awareness that fraudulent product poses a food safety risk and has been distributed to other countries.</p> <p>Please see comment under title of Section 8.</p>	Canada
<p>24. Competent authorities should cooperate collaborate <u>cooperate, collaborate</u> and exchange information with the relevant competent authorities in situations where food fraud is suspected or identified. This exchange of information could be</p>	New Zealand

<p>expanded when there is awareness that fraudulent product poses a food safety risk <u>to the health of consumers</u> and has been distributed to other countries.</p> <p>As stated all three terms are appropriate as it will depend on the circumstances. Also 'health of consumers' is more appropriate term.</p>	
<p>24. Competent authorities should cooperate [collaborate] <u>[collaboration]</u> and exchange information with the relevant competent authorities in situations where food fraud is suspected or identified. This exchange of information could be expanded when there is awareness that fraudulent product poses a food safety risk and has been distributed to other countries.</p> <p>ICBA recommends the use of the term “[collaboration]” from the options provided using the same rationale as provided above.</p>	ICBA
<p>24. Competent authorities <u>in importing and exporting countries</u> should cooperate [collaborate] and exchange information with the relevant competent authorities in situations where food fraud is suspected or identified. This exchange of information could be expanded when there is awareness that fraudulent product poses a food safety risk and has been distributed to other countries.</p> <p>Simplify the sentence, make it easier to understand</p>	Norway
<p>Sección 8: [Cooperación] [colaboración] e intercambio de información entre autoridades competentes</p> <p>Honduras sugiere alinear redacción con el principio 4</p>	Honduras
<p>25. MY propose editorial correction in paragraph 25 – including relevant information in Annex of the CXG 19-1995, that contribute to international harmonization and collaboration on the prevention and control of food fraud are essential.</p>	Malaysia
<p>25. The exchange of information should be made as early as possible, recognizing that the initial information may often be incomplete and more detailed information will be provided as it becomes available. Identification of key elements, including relevant information in <u>Annex of the CXG 19-1995 Annex</u>, that contribute to international harmonization and collaboration on the prevention and control of food fraud are essential.</p>	Malaysia
<p>25. The exchange of information should be made as early as possible, recognizing that the initial information may often be incomplete and more detailed information will be provided as it becomes available. Identification of key elements, including relevant information in <u>CXG 19-1995 Annex</u>, that contribute to international harmonization and collaboration on the prevention and control of food fraud are essential <u>relevant</u>.</p> <p>Codex does not usually use the word essential which implies a similarly binding obligation to the use of the word shall which is also not used.</p>	New Zealand
<p>24. Las autoridades competentes deberían cooperar [colaborar] e intercambiar información con las autoridades competentes pertinentes cuando se haya identificado un incidente de fraude alimentario o se sospecha que exista. El intercambio de información podría ampliarse cuando se tiene conocimiento de que un producto fraudulento plantea un riesgo de inocuidad alimentaria y ha sido distribuido a otros países.</p> <p>Honduras sugiere que se considere incluir ambos términos en el párrafo ya que no son excluyentes.</p>	Honduras
<p>26. Competent authorities may benefit from establishing appropriate information exchange routes with relevant enforcement bodies and agencies, including those responsible for dealing with criminality. In establishing such routes, competent authorities should give due consideration to information security around personal</p>	USA

<p>data, data and operationally sensitive material-material, and also have in place systems to assure the integrity of any evidence gathered and/or shared.</p>	
<p>26. ICBA would like to thank the eWG Chair and Co-Chairs for the substantial work undertaken in the progression of this guidance. We fully support the further advancement of these guidelines.</p>	<p>ICBA</p>
<p>26. Supported</p>	<p>Norway</p>
<p>26. Las autoridades competentes podrán beneficiarse del establecimiento de vías adecuadas de intercambio de información con organismos y agencias encargadas del cumplimiento de la ley, incluidas las entidades responsables en materia penal. Al establecer dichas vías, las autoridades competentes deberían dar debida consideración a la seguridad de la información en torno a los datos personales y al material sensible de carácter operativo. Asimismo, deberían contar con sistemas que garanticen la integridad de toda evidencia recabada o compartida. Se sugiere eliminar la última parte del texto, como se indica. La fundamentación es que esto es más propio de procesos judiciales.</p>	<p>Chile</p>
<p><u>Annex 1: Existing Codex Documents Addressing Food Fraud</u> New Zealand notes and agrees that this Annex will be deleted before the guideline is finalised.</p>	<p>New Zealand</p>
<p>[Nota: Se propone suprimir este anexo antes de finalizar las directrices] El comité considera necesario que se mantenga el Anexo Comentario: A fin de facilitar la comprensión del documento.</p>	<p>Peru</p>