

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4

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

Twenty-third Session

DRAFT GUIDANCE FOR MONITORING PERFORMANCE OF NATIONAL FOOD CONTROL SYSTEMS

Comments from Ecuador, India, Paraguay and Peru

Ecuador

COMENTARIO GENERAL:

Luego de realizar el análisis pertinente, Ecuador considera que en términos generales el documento está bien estructurado y apoya su avance. Sin embargo presenta los siguientes comentarios específicos.

COMENTARIOS ESPECIFICOS:

SECCIÓN 3

DEFINICIONES

Actividad:

Medidas tomadas o trabajos realizados mediante los cuales los insumos se movilizan para producir resultados específicos.

Evaluación:

Proceso para determinar la presencia o ausencia de ciertos requisitos o componentes, o hasta qué punto se cumple el requisito.

Eficacia:

Hasta qué punto se logran los objetivos o resultados de un SNCA, o se prevén lograr, tomando en cuenta su importancia relativa.

Eficacia (ISO 9000/2015): grado en el que se realizan las actividades planificadas y se logran los resultados planificados.

Ecuador solicita se tome en consideración la definición de la norma ISO 9000/2015 en la cual introduce la planificación tanto en los objetivos como en los resultados, obteniéndose el concepto de que los sistemas nacionales de control deben poseer una planificación previa.

Indicador:

Variable o factor cuantitativo o cualitativo que proporciona un medio sencillo y fiable para medir logros, reflejar los cambios vinculados a las actividades e ~~ayudar a~~ **permitiendo dar seguimiento** y evaluar el desempeño de un programa o sistema.

Insumos

(input): Los recursos económicos, humanos, técnicos o materiales utilizados en las actividades.

Resultado (outcome): Efectos ~~o consecuencia de acciones realizadas~~ **resultados previstos** que contribuyen a lograr los objetivos del SNCA.

Ecuador considera que usar en la definición de resultado es resultado previsto no podría ser claro para el lector.

Los resultados pueden clasificarse a distintos niveles, tales como máximo, alto, intermedio, preliminar o inicial.

Productos (output): Los productos y servicios resultantes de las actividades. Puede además incluir las modificaciones resultantes de las actividades pertinentes al logro de los resultados.

Verificación del desempeño: Un proceso continuo o permanente de recolección y análisis de datos para comparar en qué medida se logran los objetivos y resultados establecidos para el SNCA

India

Title

PROPOSED DRAFT GUIDANCE **PRINCIPLES AND GUIDELINES** FOR MONITORING THE PERFORMANCE OF NATIONAL FOOD CONTROL SYSTEMS

Rationale: Editorial, to be in line with title of the document given in the agenda

I. **SECTION 1: INTRODUCTION**

i) **Paragraph 1** should be modified as below:

An ~~effective~~ **A** national food control system (NFCS) is essential for ensuring the safety and suitability of food for consumers and ensuring fair practices **in the food trade**. ~~An effective~~ **A** NFCS may employ different approaches, core elements, and components, as appropriate to the national circumstances, and as described in the Codex Principles and Guidelines for National Food Control Systems (CAC/GL 82-2013).

Rationale: The proposed document focus on monitoring the performance of National Food Control System in terms of their effectiveness therefore it may not be appropriate to use term effective NFCS. Secondly, the term 'fair practices' is very broad term while the scope of the document is to ensure fair trade practices of food as mentioned under para 3 also.

ii) **Paragraph 2** should be modified as below:

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

Rationale: To align with the framework of National Food Control System as specified in Codex document CAC/GL 82-2013

II. **SECTION 2: PURPOSE OF GUIDANCE**

i) **Paragraph 8:** To include the statement "*The guidance is not intended to be used as a basis for comparing systems or imposing barriers to trade*" from Paragraph 4 currently under Section I, Introduction in paragraph 8, so that Paragraph 8 reads as:

"The guidance is intended to support self-assessment of countries NFCS and is not intended to be used as a basis for comparing systems or imposing barriers to trade"

Rationale: To make the purpose of the guidance more clear and facilitate fair trade practices.

ii) **Paragraph 11** should be modified as under:

In a comprehensive approach, a competent authority would monitor ~~its~~ performance across all components of the NFCS. However, depending on the priorities and capabilitiesa country grows.

Rationale: The document specifies the principles to monitor performance of NFCS not the performance of competent authority.

iii) **Paragraph 19 & 20** may be modified as under:

19. The planning steps are arranged in logical order, in which a preceding step supports or enables the next step. For example, it is necessary to identify the intended outcomes (step 2) before identifying indicators to measure ~~progress~~ **performance** toward those outcomes (step 3).

20. Upon completion of these steps, the competent authority will have clearly defined the specific outcomes that the NFCS is designed to achieve and developed a plan for monitoring ~~progress~~ **performance** towards achieving these outcomes.

Rationale: Editorial. Progress is the movement or advancement through a series of events or points in time; development through time while Performance is act of performing; carrying into execution or action; representation by action.

iv) **Paragraph 27** should be modified as under:

On a regular basis, the competent authority should revisit the above assessment. As capacity for monitoring and system review improves, or becomes available, the competent authority may consider a ~~more~~ comprehensive approach.

Rationale: More comprehensive approach is misleading as comprehensive approach, targeted approach and phased approach are already defined in paragraph 11 of the document.

v) Paragraph 31 should be modified as under:

“The starting point for defining outcomes will depend on the competent authority’s approach to monitoring and system review. In a comprehensive approach, a competent authority may start by **defining an setting the** NFCS Objective or **a** national goal as the highest-level outcome to be achieved. If the competent authority decides to implement monitoring and system review in a phased or targeted approach, it should identify the highest-level outcome that is applicable to their approach.

Rationale: The NFCS Objective should have been defined already while developing an NFCS and need not be defined again for the monitoring and system review purpose. Monitoring in general should aim at reviewing already established objectives and to ensure that these are being achieved.

vi) Paragraph 32 to 36

The paragraphs 32 to 36 of this document seem to be part of developing a country’s NFCS rather than monitoring and system review, which is evident from paragraphs 30 and 34 of Section 4.1-Policy Setting of the CAC/GL 82-2013 (Principles and Guidelines for National Food Control Systems).

Further, the outcome framework described in these paragraphs and in Appendix A are also part of a country’s NFCS or steps while designing a country’s NFCS.

In view of the above, it is suggested that this section should rather focus on to what level or extent the defined outcomes were achieved or the identified activities were able to achieve those.

vii) Paragraph 40 is not logically correct and should be deleted.

Rationale: Number of indicators cannot be linked with capacity because competent authority has to consider for comprehensive, targeted or phased approach depending upon the capacity. Paragraph 29 of the document intends that outcome should follow SMART criteria, therefore, it may not be appropriate that indicators are not there to measure the outcome.

viii) Paragraph 42 should be modified as under:

As the global knowledge base on indicators for NFCSs develops, the competent authority ~~should~~ **may** consider **to include** these indicators, ~~as~~ **if considered** appropriate.

Rationale: It may not be appropriate to have ‘should’ obligation because all indicators may not be applicable to all countries depending the structure/framework of NFCS. Therefore, inclusion of indicators will strictly depend on the framework of NFCS.

Paraguay

Paraguay would like to thank the Committee for the work done and the progress made in the proposed draft. Paraguay has made editorial comments as a contribution to clarify the text, without affecting the concepts nor the level of orientation of the document.

In this regard, Paraguay supports the submission of the document for adoption at Step 8 by the Codex Alimentarius Commission at its next session, provided that no significant technical changes are made to the text.

Peru

Observaciones generales:

Perú considera que el documento está trabajado en conjunto y debe agilizarse su aprobación ya que su aplicación es de interés nacional para las 3 Autoridades Sanitarias en Perú sobre “ORIENTACIONES SOBRE LA VERIFICACIÓN DEL DESEMPEÑO DE LOS SISTEMAS NACIONALES DE CONTROL DE LOS ALIMENTOS”.

Específicas:

Ninguna.