

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 2, 3, 4 and 6

GP31/CRD/12

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON GENERAL PRINCIPLES

Thirty-first Session

Bordeaux, France, 11 - 15 March 2019

(Comments from Brazil)

BRAZIL

Agenda Item 2 – Matters referred to the Committee – CX/GP 19/31/2

Consistency of the Risk Analysis Texts across the Relevant Committees

Brazil is of the opinion that the mandate given by CAC to CCGP had not been completed, noting that the only risk analysis document that established the obligation for a periodic review of maximum residue limits, and their withdrawal due to the mere passing of time, is the Risk Analysis Principles Applied by CCPR.

Regular Review of Codex Work Management: Electronic Working Groups (eWG)

Brazil understands that Electronic Working Groups are an excellent tool for the elaboration of standards since it is more inclusive and allow greater participation of Codex members. Brazil is willing to discuss the outcomes of the evaluation to be done by the Secretariat and Regional Codex Committees to identify barriers to active participation and possible solutions.

Pilot for a Committee on Standards Advancement

Brazil does not agree with the establishment of a Committee on Standards Advancement considering the difficulties that members may face with such an approach.

Discussion Paper on Food Integrity and Food Authenticity

Brazil recognizes the importance of this matter and taking note of the ongoing discussion on CCFICS considers that duplication of efforts should be avoided.

Agenda item 3 – Discussion paper on procedural guidance for committees working by correspondence – CX/GP 19/31/3

Brazil understands that working by correspondence is a good approach in the process of developing Codex standards. It is important to ensure Codex values as transparency and inclusiveness. In this sense, it is necessary to create a guideline for the Committees working by correspondence.

Agenda item 4 – Use of examples in Codex Standards – CX/GP 19/31/4

Brazil reiterates its position that some examples may hinder the understanding and application of standards but recognizes that there are examples that may be useful in certain situations and could therefore be made available as information documents.

Agenda item 6 – Discussion paper on emerging and future issues within the remit of the CCGP – CX/GP 19/31/6

Facilitating the elaboration of standards by Codex

Brazil understands that this is a broad topic and is related to different discussions that will take place during CCGP31. The process of developing Codex standards should be transparent, inclusive and reflect the different realities of member countries. It is essential that clear enough documents are drawn and always safeguarding scientific principles.

Therefore, the work of electronic groups as well as correspondence work are excellent mechanisms to achieve the Codex Alimentarius objectives, guaranteeing its core values.

Food fraud/food integrity and food authenticity

As indicated on agenda item 2, Brazil recognizes the importance of this matter and considers that duplication of efforts with the ongoing work of CCFICS should be avoided.

Consumer information

Brazil acknowledges that this matter should be dealt within CCFL scope. Discussions on a generic document that will contribute with information for consumer awareness is welcomed. There are several situations of asymmetry in food labeling which, in addition to undermining consumers' choices may create unfair trade conditions.

Possible changes to the Procedural Manual

At this moment, Brazil understands that the Procedural Manual does not require any changes. It is essential that the guidelines described are adopted by Codex different stakeholders.