



Agenda Item 5

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CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-second Session

Melbourne, Australia, 6-12 February, 2016

PROPOSED DRAFT GUIDANCE FOR MONITORING THE PERFORMANCE OF NATIONAL FOOD CONTROL SYSTEMS

(Comments at Step 3 from the European Union and its Member States (EUMS), New Zealand, Papua New Guinea, Philippines, Uruguay)

EUROPEAN UNION AND ITS MEMBER STATES (EUMS)

The European Union and its Member States (EUMS) would like to submit the following comments:

General comments:

A proposal of additional principles in section 4. PRINCIPLES OF THE PERFORMANCE MONITORING FRAMEWORK may enrich the document, such as:

- ✓ Continuous improvement approach. The aim of the performance monitoring framework is the continuous improvement of the NFCS itself, and should not be used to compare outcomes of different countries.
- ✓ Organizational commitment. To ensure that the resources intended for the verification of the NFCS are enough to guarantee that the system review is carried out properly and also to ensure that the actions taken after the findings detected in the evaluation will be put in place to guarantee the continuous improvement.
- ✓ Reliability. To ensure the continuous improvement and transmit enough confidence to all stakeholders, the system should have attention to the quality and reliability of data.

A reference in section 5.2 (between points 55 and 56) of the importance of the root cause analysis could be included, when the findings detected in the review of the NFCS will reflect any deviation or unfavourable results in any field, to ensure that the measures adopted are appropriate for the continuous improvement of the system.

Paragraph 5 - Footnote 6 (Page 2)

"6 Australia, Belgium, Denmark, European Commission, Germany, Ghana, India, Ireland, Italy, Japan, Mexico, ~~the Netherlands~~, New Zealand, Norway, South Africa, Spain, Thailand, United Kingdom, the United States, Switzerland and the FAO

Rationale: The Netherlands did not participate in this physical working group

Specific comments:

SECTION 1. INTRODUCTION

Paragraph 1. An effective national food control system (s) (NFCS) is essential for ensuring the safety and suitability of food for consumers and ensuring fair practices.

Rationale: The mandate of Codex covers not only food safety but also fair practices. So does also the national food control system. That is why the EUMS would like to clarify the scope of the guidance by precisising that it covers also fair practices.

SECTION 3: DEFINITIONS

Activity: Actions taken or work performed through which inputs (~~such as funds, staff, and other types of resources~~) are mobilized to produce specific outputs.

Rationale: There is already a definition of "input" in this section.

Efficiency: A measure of how **economically** resources/inputs (funds, expertise, time, etc.) are converted to results.

Rationale: Not valid only for economic resources, but for all resources.

Inputs: The financial, human, **technical** and material resources used for activities.

Rationale: Technical resources include: operating procedures, legislation, emergency plans, training procedures (Different than material resources that include adequate offices, labs, IT-Tools...)

Outputs: The products, ~~capital goods~~, and services which result from activities; may also include changes resulting from activities which are relevant to the achievement of outcomes.

Rationale: Are there capital goods resulting from the activities of official controls?

SECTION 4: PRINCIPLES OF THE PERFORMANCE MONITORING FRAMEWORK AND SECTION 5.2 MONITORING AND SYSTEM REVIEW STEPS

13. It is open to consultation and review by **relevant** national stakeholders during multiple stages of the process, while respecting legal requirements to protect confidential information as appropriate.

Rationale: The EUMS propose to add to paragraph 13 the term "relevant" before "stakeholders", such as it is written in the paragraph 29. As a matter of fact, the monitoring of the performance and its results cannot be communicated to all stakeholders involved in all cases. The competent authority should define the degree of transparency in relation to the goal pursued.

SECTION 5.1.: PLANNING STEPS

23. Monitoring and system review requires sufficient financial and human resources with relevant expertise to support the collection and use of data. The following questions can help the competent authority to assess existing resources and technical capacity:

- What human resource capacity and ~~financial~~ resources (**financial, human, technical and material**) are available to support monitoring and system review? How can existing resources be leveraged if necessary?
- Does the competent authority have access to individuals with expertise in strategic planning, performance management, program management, analysis, and data management?

Rationale: Human, technical and material resources should also be taken into account.

SECTION 5.2.: MONITORING AND SYSTEM REVIEW STEPS

57. Findings from monitoring and system review and subsequent changes to the NFCS should be communicated effectively and efficiently to ensure the clear exchange of information and engagement between all **relevant** stakeholders in the NFCS.

Rationale: The EUMS propose to add to paragraph 57 the term "relevant" before "stakeholders", such as it is written in the paragraph 29. As a matter of fact, the monitoring of the performance and its results cannot be communicated to all stakeholders involved in all cases. The competent authority should define the degree of transparency in relation to the goal pursued.

NEW ZEALAND

General Comments:

New Zealand thanks the US for the excellent work on revision of this document following the physical working group held in London and in which we were pleased to participate. The draft has been significantly progressed and New Zealand is confident that CCFICS now has a sound basis from which to develop guidance for Codex members. We note the influence of the World Bank and OECD work in the area of performance monitoring and while we do not disagree with the fundamentals we do wonder if this influence has made the draft too academic and complicated in the language used.

New Zealand remains very supportive of this work and looks forward to participating in the plenary discussion. We do have reasonably extensive specific comments on the draft text. Our suggestions are made with the intention to make the document simpler to understand and to remove duplication of concepts and language and are in no way a criticism of the work to date.

New Zealand Specific Comment:

Paras 1 – 6: The Introduction can be shortened, currently there is duplication and para-phrasing of what is in *Principles and Guidelines for National Food Control Systems (CAC/GL 82-2013)*. We suggest that para 4 be the introductory para and the other paragraphs (with the possible exception of para 6) be deleted. Also consideration should be given to placing a redrafted paragraph 10 into the introduction.

Correction to Footnote8 if Para 3 is retained:

The reference to para 82 of CAC/GL 82-2013 is not correct para 82 does not define 'the NFCS objectives'. If retained it would be more appropriate to reference Section 4.1, particularly paragraphs 30-34 of CAC/GL 82-2013.

Section 2 – paras 7 – 9: This section should be short and focused. Para 8 is not necessary and should be deleted.

Section 3: Definitions

Activity: Actions taken or work performed through which inputs (such as funds, staff, and other types of resources) are mobilized to produce specific outputs or support an objective or outcome. [*Rational:* for clarity and completeness]

SECTION 4: PRINCIPLES OF THE PERFORMANCE MONITORING FRAMEWORK

Paragraph 10 is general introductory text and with the addition proposed (made for clarity) could sit in the Introduction section to the document. If agreed this would leave para 11 (amended for readability) as a short introduction to the principles and will help with the flow and readability of the document. The amended paragraphs would read as follows:

10 In a comprehensive approach, a CA would monitor its performance across all components of the NFCS. However, depending on the priorities and capabilities of the CA, it may be more practical and affordable to apply the performance monitoring framework in a phased (step-wise) or targeted approach, beginning with the components of the NFCS that are in place and those that have the ability to achieve the country's national goals and objectives and then build up from there.

11 Regardless of whether # the performance monitoring framework is used in a comprehensive, phased (stepwise), or targeted approach, it the performance monitoring framework is characterized by the following principles:

Principle 1 Relevancy

Para 12. It is customized to the unique needs and structure of the NFCS and uses information collected from within and outside the system to assess the effectiveness and appropriateness of the NFCS or the relevant component part(s) identify gaps, optimize operations, and promote continuous improvement. [*Rational:* Amended to reflect the language used in Section 4.4 (para 82) of CAC/GL 82-2013.]

Principle 2 Transparency

Para 13 All aspects and stages of the process are it is open to scrutiny consultation and review by national stakeholders during multiple stages of the process, while respecting legal requirements to protect confidential information as appropriate. [*Rational:* Amended for readability and clarity. Also given that principle 3 in CAC/GL 82-2013 is 'Transparency' we are not sure that this principle is necessary in this document.]

Principle 3 Efficiency

Para 14 **It is integrated into or aligned with the NFCS to ensure the most efficient use of resources.** It builds on existing data collection and program management and **also** utilizes appropriate external data sources to assess the performance of its NFCS. *[Rational: Amended for clarity. Being an integrated or component of the NFCS, rather than being seen as additional or separate is an important element for ensuring efficiency. The final words of the second sentence are not necessary.]*

SECTION 5: PERFORMANCE MONITORING FRAMEWORK FOR AN NFCS

Add a new paragraph before para 16 to bring to the front some of the concepts and explanation given in this section. This will assist with clarity and readability and allow for deletions later in the section. Text of new para 15biz as follows:

15 biz. A monitoring and review capacity achieves Principle 9 (Self Assessment and Review Procedure) of CAC/GL 82-2013 [footnote full reference]. To implement a performance monitoring framework that meets the principles set out above it is important to have the organisational commitment; knowledge of the NFCS and its components (particularly if there are multiple competent authorities); sufficient resources and technical capacity to access or collect, and analysis date; and to use the results or information from the performance monitoring framework.

New Zealand suggests that Para 17 and the associated bullets be amended to serve as a summary and introduction for what is covered in the whole section. The amended text improves readability and clarity and allows for duplication to be removed from the section. Also the language is aligned to that used in CAC/GL 82-2013. The addition to Bullet 3 is to include system maintenance as a possible outcome – it is not necessary to always drive for ‘bigger and better’ The revised para 17 and bullets would read as follows:

17 The performance monitoring framework presents a cyclical process that includes three broad tasks: planning, monitoring, and system review. ~~Performance monitoring is an ongoing process, where each step feeds into the next step in the cycle and will be is repeated~~ **revisited** over time. **Useful resources are listed in Appendix B.**

- Through the planning steps, the CA identifies specific and related outcomes through which the NFCS contributes to its Objectives **or National Goals** and identifies indicators that can measure progress toward these ~~outcomes~~. The planning steps **therefore** establish a foundation for monitoring and system review.
- Through the monitoring steps, the CA collects data and generates the information necessary to assess progress.
- Through the system review steps, the CA uses information generated through the monitoring steps to assess the effectiveness **and appropriateness** of the NFCS. **This can confirm that the relevant component(s) are operating as required, or** ~~and~~ facilitate continuous improvement as necessary, **allowing the NFCS to learn and adapt.**

Step 1: Conduct Assessment Preparation

New Zealand suggest that Step 1 be renamed as ‘Preparation’ and Figures 1 be amended to reflect this. This is what a ‘Readiness Assessment’ is. The factors that are discussed are actually pre-requisites for designing and building the particular performance monitoring and review system for a particular country’s NFCS rather than an additional process. Getting prepared is an essential first step but as currently drafted this step is made more complicated and potentially overwhelming than it needs to be. Further, while a certain amount of preparation and planning is a key element of any ongoing process as currently presented a ‘readiness assessment’ is to be constantly repeated. Whereas it is something that should be done initially and elements reviewed or updated overtime, which is covered in section 5.2.

Also the additional paragraph 15biz proposed for the beginning of Section 5 and the amendments to para 17 mean that much of the detailed text and commentary under this step is not necessary. We therefore proposed that para 20 be shortened and amended to be an introduction and then set out the key questions that should be answered in preparation for designing and implementing a performance monitoring framework drawing these from the bullets in paras 21 - 23.

Paras 21 -23 are too detailed, much of what is covered in these paragraphs can be condensed into the key questions that are proposed or is captured in the later sub-sections (step 3 and 4). Shortening and focusing the preparation step makes the guidance simpler to read and understand.

The revised para 20 and question would read as follows and paras 21 – 23 can be deleted

20 In preparation for designing and implementing a performance monitoring framework the competent authority should answer the following questions:

- **What is the role of the competent authority (or of each competent authority) and what is the level of organisational commitment to performance monitoring?**
- **What are the legislative or policy objectives of the NFCS?**
- **How does the competent authority intend to use performance monitoring data (e.g., to assess the effectiveness of the NFCS and take preventive or corrective action to improve the system as appropriate; or to confirm that relevant components are operating as required)?**
- **Is there knowledge of the NFCS and its component parts; what data is currently collected, how is it collected, analysed and used?**
- **What human resource capacity and financial resources are available or can be accessed to support monitoring and system review?**

Para 25 and the associated bullets should be moved to Section 5.2 (new para 57biz) as it deals with future planning and capacity building. Placed here it interrupts the flow of the document.

Para 26 ~~On a regular basis, the CA should revisit the readiness assessment.~~ As capacity for monitoring and system review improves **or becomes available**, the CA may consider a more comprehensive approach. *[Rational: amended as a consequence of earlier changes and to improve readability]*

Step 2: Define Outcomes to Monitor and Evaluate

Para 28 should be deleted and the content moved to step 3 as new para 37 biz. While SMART is applicable to defining outcomes / objectives or national goals in the context of this paper these criteria are more suited to be applied to the development of indicators, as discussed in step 3 as new para 37biz.

Step 3: Establish Indicators

A new para 37 biz is suggested to set out the SMART concept that was previously in para 28, it also builds on wording from para 44. In the context of this guidance a reference to using SMART criteria fits best when discussing the establishment of indicators that will be used to assess if the desired outcome or objectives of the NFCS are being achieved or at least that progress is being made in the right direction. Such criteria should be given at the start of the section rather than in the middle of the discussion.

37 biz **Indicators should fulfil the following SMART criteria:**

- **Specific: are unambiguous, easy to interpret and transparent.**
- **Measurable: through either qualitative or quantitative data that can be subject to independent validation.**
- **Attainable: given current people and financial resources and capability.**
- **Relevant: are closely linked to the outcomes of the NFCS and meaningful from an organisational perspective.**
- **Time-bound: relate to a time period or specific target date.**

Para 38 additional text is proposed for clarity and completeness and has been moved from para 46. It is important to be clear early in this section about the unintended impacts that can occur if the easy but wrong things are measured. The amended para would read as follows:

38 Indicators may also be established for inputs and outputs **associated with activities or programs** to allow the CA to monitor how specific activities are contributing to specific outcomes. **However care should be taken when deciding on what to measure or monitor as measurement influences behaviour, so it is important to choose indicators that will incentivize the actions that will lead to achieving the intended outcomes. Just counting inputs or outputs may not provide information on what is achieved or the progress towards objectives or national goals.** ~~Various tools may be used to manage inputs and outputs, such as budgets, staffing plans, and activity plans.~~

Para 39 and 40 can run together. Additional text in para 39 is to align with earlier text and the deleted text is repetitive being covered in para 40 and is therefore not necessary. The additional text in Para 40 is for clarity and completeness. It is important to be clear about the unintended impacts that can occur if the easy but wrong things are measured. Also while using existing monitoring or data collection is a place to start it is important to recognise that these may not be monitoring or measuring the right things for an assessment of achievement of the NFCS objectives but if that is all that is available it could be better than nothing and can be revised overtime. The amended paragraphs would read as follows:

39 Where there is limited capacity for monitoring and system review, the CA may choose to start with a limited number of indicators and **the priority components of the NFCS.** ~~increase the number of indicators as capacity expands~~

40 ~~As part of a phased or targeted approach,~~ **Initially** the CA may establish indicators for which there are existing processes for data collection and analysis. **Noting that if these existing processes are not monitoring activities that can be directly linked to the NFCS objectives they may not provide adequate information on the desired objectives but may be all that is available at present. If this is the case efforts should be made to move to more appropriate monitoring overtime as capability and resources allow.** ~~or addressing priority components of the NFCS.~~

Para 42 is not necessary and can be deleted.

Para 43 fits more logically before para 41

Para 44 should be deleted as the content is now covered in para 37 biz.

Para 45 and 46. These can be deleted as they are now covered in para 37biz and 38 respectively.

Step 4: Create Monitoring Plan

Para 47 bullets: Amend second and last bullet, it is important to identify the source of any baseline data as well as what is currently being collected. Rather than 'Target values' in the last bullet this should only refer to Targets – using 'values' implies that there are only quantitative targets. Add a new 5th bullet - Methods for ensuring data quality should be included here.

- o Explanation or definition of indicator
- o Source of data (**baseline and current**)
- o Frequency of data collection
- o Methods for data collection
- o **Methods of ensuring data quality**
- o Methods for data analysis
- o Roles and responsibilities for data collection
- o Roles and responsibilities for data analysis
- o Roles and responsibilities for ensuring data quality
- o Baseline values
- o ~~Targets values~~

48 The CA should collect **or use** baseline data for each indicator. Baselines establish the current **or starting** situation and are ~~the used as a starting~~ point against which future performance will be measured. Collecting baseline data can serve as a pilot to identify indicators that may not work. [NZ Comment rational: for clarity, and to acknowledge that baseline data may be available.]

49 After baseline data has been collected and as appropriate, the CA should establish targets for indicators. A target is a specified result that is to be realized within a specific timeframe. For some indicators, the target might simply be to "increase", "maintain", or "decrease" from the baseline value; **or it could be a percentage or numerical change (e.g. increase by x%, or decrease by half).** [NZ Comment rational: for clarity and completeness.]

50 When establishing targets, the CA should **also** consider the ~~baseline performance levels, the desired level of improvement, and the~~ resource levels needed to meet the target. [NZ Comment rational: for readability and to remove repetition.]

SECTION 5.2: MONITORING & SYSTEM REVIEW STEPS

Para 54 Delete. *Rational: The content has been moved into para 57 which is a more logical place and improved the flow and readability and removes duplication.*

Para 55 should be amended to replace 'operations' with **'the policy setting, design and implementation of the NFCS'** this uses the language from CAC/GL 82-2013 and is therefore clearer and more complete. The last bullet is not necessary as it is self-evident and should be deleted. 'Associated Indicators' should be added to the second bullet for completeness. Review of associated indicators is an important use of performance data.

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

- o Conducting formal, regularly scheduled performance review meetings to assess continued appropriateness of activities and relevance of selected outcomes **and associated indicators**
- o Integrating performance data into resource prioritization and budgeting decisions
- o Identifying and sharing best practices and lessons learned
- o Identifying gaps or problems that could be addressed with capacity building

~~o Assessing other opportunities within the CA to use performance data~~

New para 55 biz is para 25 which has been moved into the review section and shortened to improve readability.

55 biz If the CA decides to implement monitoring and system review in a phased or targeted approach, because of limited human or financial resources or capability, the CA should consider steps to address these challenges, for example through capacity building, or identifying possible national or international additional funding sources.

Para 57 has been amended to include content from para 54. This is a more logical placement, removes duplication and improves flow and readability.

57 Findings from monitoring and system review and subsequent changes to the NFCS should be communicated ~~effectively and efficiently~~ **in a clear and understandable format that is suitable for the specific audiences that will receive it** to ensure the clear ~~an effective~~ exchange of information and engagement between all stakeholders in the NFCS. **The information may be presented in various formats as appropriate (e.g. written summaries, executive summaries, oral presentations, visual presentations, dashboards).**

PAPUA NEW GUINEA

Papua New Guinea welcomes the draft Guidance for Monitoring the Performance of National Food Control Systems (NFCS) document submitted by United States as a chair of the Electronic Working Group (EWG).

Papua New Guinea as a member of the EWG appreciated the tremendous amount of work done by the chair of the EWG and the contributions made by the members of the EWG. We believe that the text presented in the draft document is very comprehensive and detailed in the current form.

Also, Papua New Guinea is also discussing ways to improve and establish the National Food Control system in place in our country at this stage and this document will be used as a guidance document in the future.

Therefore, we believe that all the major important elements and essential components are captured in the draft monitoring of the NFCS document and would recommend that the current Draft document be progressed to the next step of the Codex process.

PHILIPPINES

General Comments:

We would like to commend the Working Group for the comprehensive draft document that complements CAC/GL 82-2013 *Codex Principles and Guidelines for National Food Control Systems*.

Specific Comments:

Section 2 – Purpose of Guidance

On Paragraph. 8. We would like to propose the following revision:

“This document **while** focuses on planning steps within the performance monitoring framework that establish the foundation for assessing the effectiveness of the NFCS and for facilitating continuous improvement as appropriate, **also discusses parameters covering monitoring and review steps.**”

Rationale:

Although majority of the provisions emphasizes on aspects of planning, we believe that monitoring and review steps are also crucial in ensuring that the changes/activities introduced are effective and responds to the identified needs.

Section 3 – Definitions

We would like to request the Committee to consider developing definitions for “phased approach” and “targeted approach” since these concepts are used throughout the text. A clear definition on the difference or similarities of both will further guide competent authorities in the conduct of performance review.

Section 4 – Principles of the Performance Monitoring Framework

On Para. 10. We would like to propose the revision of the text. The new text to read as:

“ A competent authority may apply performance monitoring framework using a comprehensive, phased or targeted approach. In a comprehensive approach, a competent authority would monitor its performance across all components of NFCS. However, depending on the priorities and capabilities of the competent authority, it may be more practical and affordable to apply the performance monitoring framework in a phased or targeted approach.”

Rationale: The introductory sentence provides the alternatives/options for a country in carrying out performance monitoring activities. It also provides the parameter/basis for the chosen approach.

Section 4 – Principle 1 – Relevancy

We would like to propose the revision of the wordings under this principle. The text to read as:

~~“It is customised to the unique needs and structure of the NFCS and uses relevant information collected from within and outside the system~~ **that answers to a set goal/objective determined during the planning stage** to identify gaps, optimize operations and promote continuous improvement”

Rationale: We are of the view that gathering or collection of data should be connected or associated with the goal(s) set identified during the planning stage. In the opening statements of Section 4, it was mentioned that several approaches may be used by the competent authority. As such if the competent authority decides to use targeted or phased approach, the gathering of data should also zero-in on this, so that the conduct of performance monitoring review is also streamlined and directed at accomplishing the set goal.

Section 4 – Principle 2 - Transparency

We would like to propose the revision of the wordings under this principle. The new text to read as:

“It is open to consultation and review of ~~national~~ **relevant** stakeholders during ~~multiple~~ **pertinent** stages of the process, while respecting legal requirements to protect confidential information as appropriate.”

Rationale: The term ‘*relevant stakeholders*’ is used throughout the text and this should be reflected also in the principle. Furthermore, the participation of the stakeholders will be called upon in relevant stages of the review process, which may include during the collection of data or when the proposed changes will be introduced to improve the reviewed NFCS component.

Section 4 – Principle 3 - Efficiency

We believe that the use of resources and following a set timelines or timeframe should be reflected in the principle. We would like to propose the addition of a second sentence. The new text should read as:

“It builds on existing data collection and program management and utilizes appropriate external data sources to assess the performance of its NFCS. **It also includes considerations on the use of resources and carrying-out activities following a set timeframe.**”

Section 5 - Performance Monitoring Framework for a NFCS

Paragraph 17. We would like to propose the revision of the text to read as follows:

“The performance monitoring framework presents a cyclical process that includes ~~three~~ **two** broad tasks; planning, **and** monitoring and system review. Performance monitoring is ~~an on-going~~

continuous process, where each step feed into the next step of the cycle and will be revisited over **a reasonable period of time**.”

Rationale: We would like to seek clarification on the number of broad tasks of the performance monitoring framework. We are of the view that the framework actually involves only two (2), which is planning and monitoring and system review. As it is currently presented in the draft document, the aspect of monitoring and review is discussed together as one (1) aspect on the framework (as in Figure 1, Section 5.2). On the aspect of ‘revisited over time’, we believe that this should be done within a reasonable period of time. Consideration on the period of implementation of introduced changes should be included in the ‘reasonable period of time’.

Section 5.1 – Planning Steps, Step 1- Conduct Assessment

We would like to propose revision of the title of the Section to reflect the text in Figure 1 and those referred to in the text.

“Step 1 – Conduct **Readiness** Assessment”

Paragraph 20, 2nd sentence. We believe that the readiness assessment exercise is a prerequisite whether countries can actually conduct or carry-out the entire review process. As such, we recommend that the 2nd paragraph be reworded as follows:

“The first step of the performance monitoring framework is to conduct a readiness assessment to determine the competent authority’s current capacity ~~for monitoring and system review~~ **to carry out the review**...”

Paragraph 24 and 26. We believe that these paragraphs should be moved before paragraph 22 since these are prior consideration in the conduct of the whole process.

Section 5.1 – Planning Steps, Step 2 –Define Outcomes to Monitor and Evaluate

Paragraph 29. We would like to suggest the revision of the text under paragraph 29 to reflect the previous provisions (i.e. principles). The text to read as:

” The competent authority should engage relevant stakeholders in a participatory **and transparent** process to ensure that there is consensus on the outcomes to be achieved.

Paragraph 30. We propose for the revision of the last sentence to reflect that the identification of outcome should fit the chosen approach. The new text to read as:

“...If the competent authority decides to implement monitoring system review in a phased or targeted approach, it should identify the highest-level outcome that is applicable to their ~~unique~~ **chosen** approach.

Section 5.1 – Planning Steps, Step 4 - Create Monitoring Plan

Title of the Section. We would like to propose the addition of the word ‘performance’ in the title to be consistent with the text under this section.

“Step 4: Create **Performance** Monitoring Plan”

Section 5.2 – Monitoring & System Review Steps

Paragraph 53. We would like to propose the revision of the texts in the 2nd sentence of the paragraph to delete negative connotations on manipulation of data.

“...Often, raw data ~~will need to be manipulated in order~~ **are used** to calculate indicators...”

URUGUAY

(i) OBSERVACIONES GENERALES

Uruguay agradece al grupo de trabajo presidido por los Estados Unidos de América y a las Delegaciones que participaron y contribuyeron en la elaboración del Anteproyecto de orientaciones para la verificación del rendimiento de los SNCA. Nuestro país apoya el avance del documento elevando las siguientes observaciones.

(ii) OBSERVACIONES ESPECÍFICAS

Sección 1 - Introducción

Párrafo 4

Agregar las palabras “, por lo cual las mismas, así como la información que emane de su aplicación no debería utilizarse” y suprimir las palabras “y no el objetivo de utilizarse”.

Con lo cual la oración final sugerida quedaría del siguiente modo: “La orientación tiene como objetivo respaldar la autoevaluación del SNCA de un país ~~y no el objetivo de utilizarse~~ **, por lo cual las mismas, así como la información que emane de su aplicación no debería utilizarse** como base para comparar sistemas o imponer obstáculos al comercio.”

Fundamento: Esta modificación sería necesaria para enfatizar, o expresar con mayor claridad, el objetivo de las orientaciones proporcionadas en el documento de la auto-evaluación del rendimiento de cada SNCA; y no el de comparación de sistemas entre países, evitando dar lugar a futuras trabas en el comercio.