

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 4.9

CRD37

Original Language Only

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

#### Forty-sixth Session

FAO Headquarters, Rome, Italy

27 November - 2 December 2023

#### COMMENTS OF EGYPT

#### ITEM 4.9: CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

**Work from the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) for Adoption or Approval by the Commission (CX/CAC 23/46/11)**

#### **Part 1 – Standards and related texts submitted for final adoption**

#### **Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems (NFCS)**

Egypt appreciates the approach taken in the proposed draft guidelines on equivalence and maintenance of equivalence of national food control systems and the consistency with relevant codex texts but expresses a considerable concern and requests to reconsider the proposed draft guidelines based on Egypt's present comments and remove the elements of duplications.

Egypt proposes that the process of the decision criteria in different sections needs to be considered in line with the term "factors" stated in the decision criteria definition. In other words, there is a necessity to indicate the factors in the substance of the proposed draft guidelines as it is not clear the interlink between the factors mentioned in the definition of the decision criteria in the different steps in the document.

Egypt strongly supports further development of these comments within the framework of the objectives of the proposed draft guidelines.