

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 3, 4, 5 and 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON GENERAL PRINCIPLES

Thirty-first Session

Bordeaux, France, 11 - 15 March 2019

(Comments from India)

INDIA

Agenda Item 3: DISCUSSION PAPER ON PROCEDURAL GUIDANCE FOR COMMITTEES WORKING BY CORRESPONDENCE

RECOMMENDATION 1: Recommend discontinuing the practice of using Committees working by correspondence for standard setting work and discontinue the pilot of CCS at CAC42.

COMMENTS: India supports discontinuation of the practice of using committees working by correspondence for standard setting work (developing standards) considering issues faced while developing standards in the committees working by correspondence including representativeness of the participants, the workload on the chair of the committee, consensus building etc.

However, some preliminary work may be undertaken through correspondence which includes issue identification (through review of existing standards/related Codex texts or emerging and critical issues identified by RCC), and decision on holding physical meetings.

Hence, it would be useful that the working procedures for the Committees working by correspondence are developed for streamlining such working.

RECOMMENDATION 2: Consider whether there is value to having procedures for limited committee work by correspondence (similar to IPPC) and criteria to identify such work.

COMMENTS:

- i. India supports to have procedures for limited committee work by correspondence with the understanding that procedure will provide guidance to undertake preliminary work as mentioned above. It may also define the specific decisions that the Committee may address by means of electronic exchange (similar to IPPC). However, it may be highlighted that guidance on reaching consensus as provided in IPPC procedural manual for standard setting would render more workload on the chairperson of the committee working by correspondence.
- ii. India is also of the view that criteria to identify work for committees working by correspondence should be in place and should be limited to the work that does not require active decision making on the part of members in respect of technical issues that are considered critical for development of the standards.

RECOMMENDATION 3: With regards to Codex Committees currently not holding physical meetings:

(a) Identify discrete topics that could be dealt with working by correspondence as a committee:

COMMENTS:

Although India doesn't support any substantive decision making to happen through correspondence mode of working, however, if need be, Codex committees currently not holding physical meetings could work by correspondence and may consider topics such as follows:

- reviewing existing standards/related Codex texts
- establishing EWG

- reviewing emerging and critical issues referred by RCC
- planning of future work
- decision on holding physical meeting

(b) What are the benefits working this way rather than working in an electronic working group under CAC.

COMMENTS:

Working by correspondence as a Committee will provide opportunity to discuss work at committee level itself which may also include technical issues to some extent that may not be possible in case of EWG working under CAC since usually CAC members are not subject experts. Further, it is not possible for CAC to discuss technical issues in detail due to quantum of work and time constraints. Hence it is better to leave such agenda within the domain of concerned Codex Committees, rather than CAC.

RECOMMENDATION 4: With regards to Codex Committees currently holding regular physical meetings: Consider whether working by correspondence on certain topics could be used to reduce the frequency of physical meetings and what would be the advantage compared to EWG. E.g. Committees with no current work items could instead of adjourning, suspend physical meetings and work by correspondence on horizon scanning, topic identification, updating and corrections of standards etc. The committee could consider creating EWGs to prepare drafts that would then be discussed physically once sufficiently advanced.

COMMENTS:

India does not support the approach of working by correspondence to reduce the frequency of physical meetings in case of Codex committees currently holding regular physical meetings with sufficient work. India supports their current way of working which combines both physical working as well as EWG, as per requirements of the agenda.

However, in case of Codex Committees currently active but with no significant current work items or who are on the verge of sine die, the approach of working by correspondence on horizon scanning, reviewing existing standards and creating EWG may be adopted along with the development of the criteria to decide on when to hold physical meeting.

RECOMMENDATION 5: Discuss the procedural changes needed in the Rules of Procedure to be able to do limited committee work by correspondence.

COMMENTS:

India believes that we must develop some basic principles before any work is taken up on these lines, howsoever limited in scope it may be. Further, India is not in favour of opening up Procedural Manual to any changes at this stage, without having any experience of working on these lines.

Therefore, India suggests that it would be prudent to implement this approach for some years down the line and based on experience gained, procedural changes, if required, in the Rules of Procedure could be considered at a later stage.

RECOMMENDATION 6: Prioritize the review of existing Guidelines on Electronic Working Groups over the development of further procedures regarding correspondence. Such review would elaborate on the findings of the regular review (recommendations on EWG in REP17/EXEC2, para 91).

COMMENTS:

As stated above, India is not in favour of making any changes in the Codex Procedural Manual at this stage; however, we may review existing Guidelines on Electronic Working Groups, so as to provide some base for development of procedures regarding working by correspondence. Considering review of existing guidelines on EWG and experiences gained through implementation of the approach as provided in recommendation 5 mentioned above, we may develop procedures for committees working by correspondence which may be incorporated in Procedural Manual separately at later stage.

In view of the above, India also suggests that development of procedures regarding working by correspondence should not hamper the current way of working for EWG, PWG and physical meeting of codex committee and new procedures being developed should not be a replacement for the established procedures for EWGs.

Agenda Item 4: USE OF EXAMPLES IN CODEX STANDARDS

COMMENTS: Considering the diversified nature of examples, it is appropriate that Committees consider the use of examples on a case by case basis in the relevant Codex texts.

Agenda Item 5: INFORMATION ON ACTIVITIES OF FAO AND WHO RELEVANT TO THE WORK OF CCGP

COMMENTS: India appreciate the joint efforts of FAO/WHO/African Union to organise International Food Safety Conference in Addis Ababa, Ethiopia on 12-13 February, 2019 to identify the key actions and strategies to address current and future challenges to food safety globally. India also actively participated in this conference and showcased the India's low cost and effective model of food safety, which primarily focuses on empowering consumer and building capacities of key stakeholders and has relevance for all low and middle income countries that are struggling to set up system for food safety.

India would also participate in FAO/WHO/WTO International Forum on Food Safety and trade in Geneva, Switzerland on 23-24 April, 2019.

Agenda Item 6: DISCUSSION PAPER ON EMERGING AND FUTURE ISSUES OF RELEVANCE TO CCGP

COMMENTS: India is of the view that most of the areas identified in this discussion paper are more relevant to other codex committees and work on some of the areas identified have already been initiated by the respective Codex committees.

Considering the mandate of CCGP, item 1 "Facilitating the elaboration of standards by the Codex" and item 7 "Possible changes to the Procedural Manual" listed in the paper may be taken up as future work by the committee.