

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 5**

**Add.1**

**CX/GP 23/33/5**

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**Original language only**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON GENERAL PRINCIPLES**

**Thirty-third Session**

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### **REQUEST FOR COMMENTS ON CODEX PROCEDURAL MANUAL: UPDATE TO THE GUIDE TO THE PROCEDURE FOR THE AMENDMENT AND REVISION OF CODEX STANDARDS AND RELATED TEXTS**

#### **Comments in reply to CL 2023/80/OCS-GP**

*Comments of Canada, Costa Rica, Egypt, European Union, Indonesia, Japan, Kenya, Malaysia, Paraguay, Peru, Republic of Korea, Senegal, Thailand, Türkiye, Uganda, USA and ICUMSA*

#### **Background**

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/80/OCS-GP issued in September 2023. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

#### **Explanatory notes on the appendix**

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

## GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<p>Canada appreciates the opportunity to provide comments on CL 2023/80/OCS-GP and is, in general, supportive of adding clarity to enhance consistency with respect to categorization of various changes to existing Codex texts.</p> <p>Canada notes that if changes are adopted, this could have impact on existing work, where changes may have already been classified as revisions or amendments to Codex texts. In addition, this could impact Circular Letters (CLs), information documents, and requests for work proposals, where the term 'revision' is commonly used. These potential impacts should be explored.</p> <p>Should changes be adopted, Members will need to become familiar with a new terminology and criteria. Canada suggests that it will be important that awareness/educational activities be planned to ensure that Members and Observers in the various Codex Committees are aware and understand the new terms and definitions, along with their equivalents in other languages.</p>	Canada
Costa Rica considera que, en línea con la actualización del MP, los cambios planteados en el anexo 1 son necesarios a fin de garantizar la coherencia y que los cambios realizados en los textos del Codex se reflejen de manera clara, en ese sentido los apoya	Costa Rica
Egypt appreciates the work done in the proposed updates & agrees on it.	Egypt
<p>The Member States of the European Union (MSEU) support the new approach suggested by the Codex Secretariat to improve the way Codex standards are revised. The MSEU notably welcome the improvements around the traceability of the various iterations of Codex texts over time.</p> <p>The MSEU are of the opinion that the procedural transposition of this new approach should be achieved promptly to enable its practical implementation without unnecessary delay. However, we would like to propose some additional modifications (in revision mode thereafter) that aim at improving the overall clarity, consistency and easy understanding of the new procedures.</p> <p>Finally, the MSEU also would like to raise the following points:</p> <ul style="list-style-type: none"> <li>- It is unclear whether an amendment, in its new meaning, should now be submitted to critical review. The revised Part 2 only qualifies proposals for new work and new edition as eligible to critical review and necessitating a project document. However, paragraph 31 of the Guide also seems to imply that amendments are considered by the Executive Committee during critical review. This should be discussed and clarified. The MSEU believe that a full critical review is not necessary as a project document is not needed to submit an amendment.</li> <li>- There could be benefits in specifying the conditions under which a proposal for a new edition would not need a project document (see para 30).</li> <li>- Guidance and clear communication will be needed to ensure that this new approach and new procedures are well-understood and implemented consistently across the different committees. This could notably be an aspect of the practical guidance that the Codex Secretariat was tasked to draft on new work proposals (see CX/GP 23/33/2, paras 30-31).</li> </ul>	European Union

<p>- Apart from methods of analysis, there is no mention in the working document of specific standards whose elaboration and revision are governed by ad hoc procedures, such as MLs or MRLs. While the MSEU believe that this is not a hurdle to the implementation of the new approach, further work could be undertaken to evaluate whether other modifications are necessary in the Procedural Manual to ensure global consistency and harmonization.</p>	
<p>Indonesia is of the view that “new edition” is the result of a revision of an existing Codex standard. Indonesia proposes to still using the term “revision” because it explain the process of updating the Codex documents. The term "new edition" refers to the document is resulted from a revision</p>	<b>Indonesia</b>
<p>Japan appreciates the opportunity to submit comments on the proposed update to the Guide. Japan’s general view is that a clearer definition and scope for amendment and revision as proposed would be helpful for the Committees and the Commission to decide to amend or revise a standard. Japan also believes that a consistent approach in the procedure to revise/amend standards is one of the most important parts of transparency of the Codex standards setting work. In that view, Japan supports that the inconsistency in decisions to omit step procedures for similar types of changes should be reduced.</p> <p>However, there are some concerns and questions about the proposed changes to the Guide.</p> <p>Regarding the three proposed categories of updates, i.e., correction, amendment, and new edition, the change in terminology will be a major change from the long-standing practice in Codex, which would cause confusion for Members and Observers. In particular, the change from revision to new edition will require not only the proposed update of Section 2 of the Procedural Manual, but the review of the other Parts and sections. The rationale for the need for consistency between the Codex text and FAO’s and ISO’s publication is unclear.</p> <p>It is proposed to separate correction from amendment as a new category and to omit Step 1-7 for correction. Regarding this proposal, it would be better to retain the original text “It will be open to the Commission to adopt the amendment at Step 8 of the uniform procedure” rather than to omit Step 1-7, as there may be cases where it is difficult to distinguish between correction and amendment. Under the current Procedural Manual, regardless of the nature of the changes made to the text and the total number of changes, the Commission has the final authority to determine to amend or revise a standard, whether an amendment proposed is an editorial or substantive nature and determine which procedure to choose. In that view, we would suggest including in the Procedural Manual that the Commission has the final authority for correction, as well as for amendment and revision.</p>	<b>Japan</b>
<p>Kenya appreciates the work undertaken by the Codex Secretariat in the proposing updates to the Codex Procedural Manual.</p>	<b>Kenya</b>
<p>Malaysia supports work in reviewing Section 2 of the PM for ensuring uniform procedure across Committees in elaborating Codex texts. We appreciate the assessment and proposal by the Codex Secretariat and FAO OCCP, and our comments are as reflected in specific parts.</p> <p>Malaysia is also of the view that it is also important for CCGP to consider and deliberate on the implementation i.e. the transition of the change once it is finalised.</p>	<b>Malaysia</b>
<p>Paraguay expresa su preocupación por la falta de acceso al texto en español como uno de los idiomas empleados por el Comité, en el tiempo y la forma establecido en la Sección III del Manual de Procedimientos. No obstante, Paraguay manifiesta su conformidad con la propuesta de actualización de la Guía sobre el Procedimiento de enmienda y revisión de las normas y textos afines del Codex.</p>	<b>Paraguay</b>
<p>Perú solicita aclarar si el cambio de “revisión” por “nueva edición” impactaría en el proceso de aprobación, ¿se colocaría en las normas o textos afines el año de la nueva edición y ya no el año inicial seguido con el año de las enmiendas (revisiones anteriores)?</p>	<b>Peru</b>

<p>Le Sénégal apprécie et félicite le secrétariat de Codex d'avoir entamer ces travaux qui permettront de pallier aux problèmes d'incompréhension de ces termes et de clarifier ces différentes définitions.</p>	<p><b>Senegal</b></p>
<p>Thailand is of the view that further explanation of the determination of the "first edition" and the proposed copyright statement mentioned in 7.1 of CX/GP 23/33/5 need to be added to the Guide. This is to provide clarification for current and future users of Codex texts.</p>	<p><b>Thailand</b></p>
<p>The United States would like to offer the following General Comments in response to this Circular Letter on Updates to the Codex Procedural Manual (PM).</p> <p>For many years the Guide to the Procedure for the Amendment and Revision of Codex Standards and Related Texts contained in the PM has been applied inconsistently across committees.</p> <p>Some Codex texts have been revised with no record of what was revised within the standard. Some examples of this include: the General Standard for Contaminants and Toxins in Food and Feeds (CXS 193-1995), which was revised in 2008 but the comment in the report of the 2nd Session of the Codex Committee on Contaminants in Foods (CCCF2) indicates only that there was a proposal for revision of text; and the Code of Ethics for International Trade in Food Including Concessional and Food Aid Transactions (CAC/RCP 20-1979), which was revised in 1985, but no meetings before that year reference specific changes to the Code.</p> <p>The United States welcomes this effort to ensure that changes of a similar nature introduced into Codex texts should be treated uniformly across committees, and to facilitate Codex Secretariat documentation presented to the CAC. Uniform application to improve consistency and clarify hierarchy of the new terms "correction, amendment and new edition" (replacing revision) will greatly enhance transparency in Codex.</p> <p>The United States supports efforts to achieve greater clarity and consistency in Codex procedures and alignment and will review changes in any adopted texts with our delegates to each committee where the text originated before changes are agreed upon.</p> <p>We look forward to the Secretariat's presentation and the discussion in CCGP.</p>	<p><b>USA</b></p>
<p><b>Introduction</b></p>	
<p>Paragraph 8. It will be for the Commission itself to keep under review the <del>revision update</del> <u>modification</u> <del>of existing Codex standards</del>, the term "modification" being understood as either corrections, amendments or new editions (see Part 7 of this section) The procedure for <del>revision</del> <u>a new edition</u> should, mutatis mutandis, be that laid down for the elaboration of Codex standards, <del>except that</del> The Commission may decide to omit any <del>other step or steps of that procedure where, in its opinion, an amendment or new edition proposed by a Codex committee subsidiary body, or the Codex Secretariat, or a Member of the Commission is in line with the criteria outlined in part 7 - Guide to the procedure for the correction, amendment and new editions</del> <u>modification of Codex standards and related texts is either of an editorial nature or of a substantive nature but consequential to provisions in similar standards adopted by the Commission at Step 8.</u></p> <p>The word "update" has a specific meaning (bringing more recent information) that may not encompass the 3 possible changes to which an existing standard can now be submitted (correction, amendment, new edition).</p> <p>Same remark for the word "revision", hence the proposed use of the word "modification" that is more inclusive.</p> <p>We believe that these terms of "corrections, amendments or new editions" should be properly introduced at this stage for clarity reasons as two of them are used in the subsequent sentences of this paragraph.</p>	<p><b>European Union</b></p>

<p>Párrafo 8. Quedará a discreción de la Comisión decidir si debe tenerse en estudio la <del>revisión</del> <u>actualización</u> de las normas del Codex. El procedimiento de <del>revisión</del> <u>para una nueva edición</u> será, <i>mutatis mutandis</i>, el establecido para la elaboración de las normas del Codex, <del>con la salvedad de que</del> <u>La</u> Comisión podrá decidir la omisión de <del>cualquier otro trámite o los</del> <u>trámites</u> del procedimiento cuando, a su juicio, una enmienda <u>o una nueva edición propuesta</u> <del>propuestas</del> por un comité del Codex <u>o por la Secretaría del Codex se ajuste a los criterios expuestos en la Guía sobre el procedimiento de corrección, enmienda y nuevas ediciones de las normas y textos afines del Codex (Parte 7).</u> <del>sea de forma o de fondo, pero consecuente a disposiciones de normas análogas adoptadas por la Comisión en el trámite 8.</del></p> <p>Eliminar la palabra "de", segundo línea que se encuentra después la la palabra "El procedimiento"</p>	Costa Rica
<p>Paragraphe 8 : Le Sénégal appuie les changements apportés à ce paragraphe car apportant des précisions sur la procédure d'élaboration des normes CODEX.</p>	Senegal
<p><b>Part 2 – Critical review</b></p>	
<p><b>Proposals to undertake new work or to <del>revise</del><u>update</u> modify a standard</b></p>	European Union
<p><b>Proposals to undertake new work or to <del>revise</del><u>update</u> a standard</b></p> <p>Kenya proposes that the title should read: Proposals to undertake new work or new edition of a standard Rationale: Updating includes correction, amendments and new edition but para 12 only addresses requirements for new work and new editions while excluding amendments and corrections</p>	Kenya
<p>Paragraphe 12: Le Sénégal appuie le changement du terme « révision » par « nouvelle édition » et « réviser » par « mettre à jour ».</p>	Senegal
<p><b>Part 7. Guide to the procedure for the <u>correction</u>, amendment and <del>revision</del> <u>new editions</u> of Codex standards and related texts</b></p>	
<p><b>Part 7. Guide to the procedure for the <u>correction</u>, amendment and <del>revision</del> <u>new editions</u> of Codex standards and related texts</b></p> <p>Codex text has existed for so long and Member Countries are used to straight forward Codex text publication system which goes by amendment or revision. Malaysia can agree to correction but we would like to retain amendment and revision, and to further clarifies the demarcation between the type of changes that falls within these 2 categories.</p> <p>As for edition, we look at edition as more to reflect sufficient changes that merit a standard a new version. For example, twice revisions may result into a new edition of a standard. As such while we support to retain revision category, a new provision could be included to address publication of new edition of a Codex standard or related text due to substantial changes, of which is to be decided by the Commission. This could be done provided past editions would be made available in Codex system and accessible to Members and Observers to avoid loss of history on the changes done.</p>	Malaysia
<p><b>Part 7. Guide to the procedure for the <u>modification</u> <del>correction</del>, <del>amendment</del> <u>of Codex standards</u> and <u>related texts</u><del>revision</del> <del>new editions</del> <u>of Codex standards and related texts</u></b></p>	European Union
<p>Paragraph 24. The procedure for <del>amending or revising</del><u>updating</u> <del>modifying</del> a Codex standard is laid down in paragraph 8 of the introduction of Section 2: Procedures for the elaboration of Codex standards and related texts. This guide provides more detailed guidance on the <del>existing</del> procedure for <u>updating</u> the modification of Codex standards: <del>the</del> <u>corrections, amendments and</u> <del>revision</del> <u>new editions</u> of Codex standards and related texts.</p>	European Union

Paragraphe 24: Le Sénégal appuie les propositions de changement au paragraphe 24 de la partie 7.	<b>Senegal</b>
<p>Paragraph 24. The procedure for <del>amending or revising</del><u>updating</u> a Codex standard is laid down in paragraph 8 of the introduction of <u>Section 2: Procedures for the elaboration of Codex standards and related texts</u>. This guide provides more detailed guidance on the <del>existing</del> procedure for <del>updating of</del> Codex standards: <del>the corrections, amendments and revision</del> <u>new editions</u> of Codex standards and related texts.</p> <p>There is no need for "of" in this statement.</p>	<b>ICUMSA</b>
<p>Paragraph 25. When the Commission has decided to amend or <del>revise a</del> <u>develop a new edition of a standard</u>, the <del>unrevised</del> <u>existing</u> standard will remain the applicable Codex standard until the amendment to the standard or the <del>revised</del> <u>new edition of the</u> standard has been adopted by the Commission. <u>Corrections, as described in paragraph 26, will be the responsibility of the Codex Secretariat, who will inform forward to the subsequent Commission of any corrections made to Codex standards since its previous session.</u></p> <p>Malaysia is of the view that correction should be retained for adoption at Step 8 by Commission (see Paragraph 31.a) through Codex Secretariat to the Commission. We note the Codex Secretariat concern as in 6.6 CX/GP 23/33/5, however to avoid unintended circumstances for example in the case of correction to incorrect footnote, or an incorrect value or symbol, the adoption at Step 8 should be retained.</p> <p>We are also of the view that when correction is published, the corresponding Codex Committees should also be made known of such proposed correction.</p> <p>Malaysia proposes to amend the text as above.</p> <p>Corresponding amendment is also proposed in para 26.</p>	<b>Malaysia</b>
Paragraphe 25: Le Sénégal appuie la précision apportée au paragraphe 25 concernant la prérogative du Secrétariat du Codex sur le partage des informations relatives aux corrections.	<b>Senegal</b>
<p>Paragraph 25. When the Commission has decided to amend or <del>revise a</del> <u>develop a new edition of a standard</u>, the <del>unrevised</del> <u>existing</u> standard will remain the applicable Codex standard until the amendment to the standard or the <del>revised</del> <u>new edition of the</u> standard has been adopted by the Commission. <u>Corrections, as described in paragraph 26, will be the responsibility of the Codex Secretariat, who will inform the subsequent Commission for its consideration and adoption of any corrections made to Codex standards since its previous session.</u></p> <p>While it is understood that the current practice is for the Codex Secretariat to address corrections immediately and inform the Commission of editorial changes to a standard, it is important that the Commission still have final 'say' over the adoption of corrections. This is done through the Commission adopting the amendment at Step 8; this concept should not be excluded from the text.</p>	<b>Canada</b>
<p>Paragraph 25. <del>When the Commission has decided to amend or revise a develop a new edition of a standard, the unrevised existing standard will remain the applicable Codex standard until the amendment to the standard or the revised new edition of the standard has been adopted by the Commission. Corrections, as described in paragraph 26, will be the responsibility of the Codex Secretariat, who will inform the subsequent Commission of any corrections made to Codex standards since its previous session.</del></p> <p>Move par 25 down before par 29 for better clarity. The numbering needs to be updated accordingly.</p>	<b>European Union</b>

<p>Paragraph 25. When the Commission has decided to amend or <del>revise a</del> <u>develop a new edition of a standard</u>, the <del>unrevised</del> <u>existing standard</u> will remain the applicable Codex standard until the amendment to the standard or the <del>revised</del> <u>new edition of the standard</u> has been adopted by the Commission. <u>Corrections, as described in paragraph 26, will be the responsibility of the Codex Secretariat, who will inform the subsequent Commission of any corrections made to Codex standards since its previous session.</u></p> <p>In the added sentence, Thailand would like to seek clarification on the term "inform". We are not certain whether it refers to the situation where the Codex Secretariat make all the changes deemed necessary before "informing" CAC, or the Codex Secretariat reviews and makes a proposal to CAC for decision-making prior to any changes can be made.</p>	<p><b>Thailand</b></p>
<p><u>A <b>correction</b> means editorial fixes and includes spelling mistakes, incorrect bold or italics, other incorrect formatting of text, an incorrect footnote, or an incorrect value or symbol. Omit steps 1-7 when making a correction. Correction is forwarded to the Commission for adoption at Step 8 of the Uniform Procedure. A corrigendum itemizing the changes made is required.</u></p> <p>Malaysia agrees to the introduction of 'correction' to cater what was earlier taken as editorial amendment.</p> <p>However, we seek more information on changes on 'incorrect footnote, incorrect value or symbol', particularly how it is determined to be incorrect. This is because change of footnote, value or symbol may result in substantial change. There need to be more clarity on how the incorrect text is identified before this change is agreed.</p> <p>Further referring to our comment in para 25, consequential change proposed in para 26 is above.</p>	<p><b>Malaysia</b></p>
<p><u>A <b>correction</b> means editorial fixes and includes spelling mistakes, errors, incorrect bold or italics, other incorrect formatting of text, an incorrect footnote, or an incorrect value or symbol. Omit steps 1-7 when making a correction. The preparation of a project document is not required and Steps 1-7 may be omitted when making a correction. correction and it will be open to the Commission to adopt the correction at Step 8 of the uniform procedure. A corrigendum itemizing the changes made is required.</u></p> <p>Please see Canada's comments for paragraph 25 and paragraph 31 a).</p>	<p><b>Canada</b></p>
<p><u>A <b>correction</b> means editorial fixes and includes spelling mistakes, incorrect bold or italics, other incorrect formatting of text, an incorrect footnote, or an incorrect value or symbol. Omit steps 1-7 when making a correction. A corrigendum itemizing the changes made is required.</u></p> <p>This sentences describe the process of how to deal with correction in Codex texts. As a result, it shouldn't be in the definition and should instead be moved to a paragraph that describes the process of correction</p>	<p><b>Indonesia</b></p>
<p><u>A <b>correction</b> means editorial fixes and includes spelling mistakes, incorrect bold or italics, other incorrect formatting of text, an incorrect footnote, or an incorrect value or symbol. Omit steps 1-7 when making a correction. A corrigendum itemizing the changes made is required.</u></p> <p>This sentence describes the process of how to deal with correction in Codex texts. It, therefore, should not be a part of the definition but should be moved to an appropriate paragraph that explains the process of correction, e.g., para. 25. In addition, the format and placement of the corrigendum should be clearly specified.</p>	<p><b>Thailand</b></p>

<p>An <b>amendment</b> refers to any change to the standard that updates the existing information. <del>means any addition, change or deletion of text or numerical values in a Codex standard or related text, may be editorial or substantive, and concerns one or a limited number of articles in the Codex text.</del></p> <p>In particular, amendments <del>of an editorial nature</del> may include but are not limited to:</p> <p>Malaysia can agree to the approach of middle category of change i.e. amendment, however having the word 'but are not limited to' in the definition without guidance on the scope will again open rooms for different interpretations which could overlaps with revision (new edition) category.</p> <p>There need to be clearer demarcation where amendment ends or when revision (new edition) applies.</p> <p>More discussion and sharing of examples would be beneficial on what are other possible amendments that would not fall under 'new edition'.</p>	<b>Malaysia</b>
<p>An <b>amendment</b> refers to any change to the standard that updates the existing information. <del>means any addition, change or deletion of text or numerical values in a Codex standard or related text, may be editorial or substantive, and concerns one or a limited number of articles in the Codex text.</del></p> <p>In particular, amendments <del>of an editorial nature</del> may include but are not limited to:</p> <p>For clarity, Canada asks whether the definition of "amendment" should include whether or not a project document is required? This added clarity will be helpful given that the proposed text clearly indicates whether a project document is needed for 'corrections' and 'new editions'. Based on the proposed criteria, it would appear that a project document is not needed for amendments.</p>	<b>Canada</b>
<p>An <b>amendment</b> refers to any change to the standard that updates the existing information. <del>means any addition, change or deletion of text or numerical values in a Codex standard or related text, may be editorial or substantive, and concerns one or a limited number of articles in the Codex text.</del></p> <p>In particular, amendments <del>of an editorial nature</del> may include but are not limited to:</p> <p>Kenya Proposes that this statement should read: An amendment refers to any change to the standard that updates the existing information where there is no new data introduced. Further bullet 2,4,5 and 6 should be amended as appropriate.</p> <p>Rationale: To minimize repetition in the 2nd, 4th, 5th and 6th bullet. This further clarifies difference between an amendment and new edition.</p>	<b>Kenya</b>
<p><del>correcting/fixing a technical inaccuracy or an incorrectly reported number ;</del></p>	<b>Canada</b>
<p><u>partial re-writing of existing sections or sub-sections when there is no new data introduced;</u></p> <p>For these guidelines to be successful in ensuring consistent application of the categories, it will be important for Members to have a common understanding of what 'new data' is referring to. Further discussion or clarity may need to be included for the purposes of this text.</p>	<b>Canada</b>
<p>Paragraphe 26: Le Sénégal appuie les propositions de définitions relatives aux corrections et amendements car ils apportent des éclaircissements importants sur ces termes dans le cadre de la procédure d'élaboration des normes Codex.</p>	<b>Senegal</b>
<p><u>An explanation of the changes made to the text is required for all amendments.</u></p>	<b>Canada</b>



<p>_Based on CX/GP 23/33/5, paragraph 6.9 "Multiple amendments, over the course of years, would carry a cumulative set of these explanations, covering all changes.". Is it required to include this level of detail in the proposed changes to the text?</p>	
<p><u>An explanation of the changes made to the text is required for all amendments.</u></p> <p>Republic of Korea recommends that the definition of "New edition" in paragraph 28 should be added right after "Amendment" part in Paragraph 26 to match context flow.</p> <p>Paragraph 26.</p> <p>.</p> <p>.</p> <p>.</p> <p>An explanation of the changes made to the text is required for all amendments.</p> <p>A new edition applies to any change to a standard made in the spirit of updating the content, and for anything not covered by a correction or amendment, including:</p> <ul style="list-style-type: none"> <li>• any new data/provision added to the text, regardless of how small the change;</li> <li>• the addition or deletion of a section or end matter (appendix);</li> <li>• changing titles of sections or sub-sections; and</li> <li>• re-writes of entire sections, regardless of length.</li> </ul> <p>A sentence justifying the reason for the new edition is required for all new editions.</p>	<p><b>Republic of Korea</b></p>
<p>Paragraph 28. <del>Revision means any changes to a Codex standard or related text other than those covered under "amendment" as defined above.</del> <b>New edition</b> applies to any change to a standard made in the spirit of updating the content, and for anything not covered by a correction or amendment, including:</p> <p>The proposed definition for 'amendment' refers to any change that updates the existing information, whereas the proposed definition for 'new edition' refers to any change made in the spirit of updating the content. Canada feels that there could be confusion between the concepts of 'updating existing information' and 'updating the content' of a standard.</p>	<p><b>Canada</b></p>
<p>Paragraphe 28: Le Sénégal appuie le remplacement du terme « révision » par « nouvelle édition » afin d'apporter de mieux différencier les changements techniques dans une norme Codex.</p>	<p><b>Senegal</b></p>
<p>Paragraph 28. <del>Revision means any changes to a Codex standard or related text other than those covered under "amendment" as defined above.</del> <b>New edition</b> Revision applies to any change to a standard made in the spirit of updating the content, and for anything not covered by a correction or amendment, including:</p> <p>Our comments are as reflected in Part 7 - Codex text has existed for so long and Member Countries are used to Codex text publication system which goes by amendment or revision. Malaysia can agree to correction, but we would like to retain amendment and revision, and to further clarifies the type of changes that falls within these 2 categories.</p> <p>There need to be clearer demarcation where amendment ends or when revision (new edition) applies.</p>	<p><b>Malaysia</b></p>

<p>More discussion and sharing of examples would be beneficial on what are other possible amendments that would not fall under 'new edition'. <del>any new data/provision</del> data added to the text, regardless of how small the change;</p>	
<p>The proposed text is silent on the deletion of data that is no longer needed or accurate. Should this information be removed from an existing text, would this constitute an 'amendment' or a 'new edition'? Further clarity is needed here. If any new provision triggers the categorization of a change as a 'new edition', this could be inconsistent with the criteria in the 'amendment' category, which includes re-writes of an existing section. It is possible that the re-write of an existing section creates a new provision but does not introduce 'new data'. Would this be considered an 'amendment' or a 'new edition'?</p>	<b>Canada</b>
<p><u>A sentence justifying the reason for the new edition is required for all new editions.</u></p> <p>Türkiye support this document which describes how to better clarify and define the terminologies of revision, amendment, correction and new edition, and clarify workflows and responsibilities. Türkiye proposes to prepare a comparison chart/table for the new edition which comparing the old and new edition of related standard and showing what has been added, what has been changed and what has been removed.</p>	<b>Türkiye</b>
<p><u>Insert here Paragraph 25 from above: When the Commission has decided to amend or <del>revise</del> develop a new edition of a standard, the <del>unrevised</del> existing standard will remain the applicable Codex standard until the amendment to the standard or the <del>revised</del> new edition of the standard has been adopted by the Commission. Corrections, as described in paragraph 26, will be the responsibility of the Codex Secretariat, who will inform the subsequent Commission of any corrections made to Codex standards since its previous session.</u> Paragraph 29. The Commission has the final authority to determine whether a proposal made constitutes an amendment or a <del>revision</del> new edition. <del>, and whether an amendment proposed is of an editorial or substantive nature.</del></p>	<b>European Union</b>
<p>Paragraphe 29: Le Sénégal appuie la proposition de changement de « révision » par « nouvelle édition »</p>	<b>Senegal</b>
<p>Paragraph 29. The Commission has the final authority to determine whether a proposal made constitutes an amendment or a <del>revision</del> new edition. <del>, and whether an amendment proposed is of an editorial or substantive nature.</del></p> <p>Kenya proposes that this para be revised to read: The Commission has the final authority in the event of lack of consensus and/or clarity to determine whether a proposal made constitutes an amendment or a new edition. Rationale: Since the guide is clear on the criteria for changes in Codex texts the input of the Commission is required where there is lack of consensus or clarity.</p>	<b>Kenya</b>
<p>Paragraph 30. Proposals for <del>the amendments to</del> or for a <del>revision</del> new edition of Codex standards and related texts should be submitted to the Commission by the subsidiary body concerned, by the Secretariat, or a Member of the Commission where the subsidiary body concerned is not in existence or has been adjourned <i>sine die</i>. In the latter case, proposals should be received by the Secretariat in good time (not less than three months) before the session of the Commission at which they are to be considered. The proposal for a new edition should be accompanied by a project document (see Part 2 of the elaboration procedures) unless the Executive Committee or the Commission decides otherwise. <del>However, if the amendment proposed is of an editorial nature, the preparation of a project document is not required.</del></p> <p>Position: Uganda proposes the 6th line to read “ The request for a new edition should be accompanied by a project proposal with justifications.</p> <p>Rationale: To emphasise the need for a project proposal since the word document represents a wide category of texts.</p>	<b>Uganda</b>
<p>Paragraph 30. Proposals for <del>the amendments to</del> or for a <del>revision</del> new edition of Codex standards and related texts should be submitted to the Commission by the subsidiary body <del>concerned</del> concerned or, <del>by when the Secretariat, or a Member of the Commission where the subsidiary body</del></p>	<b>European Union</b>

<p>concerned is not in existence or has been adjourned <del>sine die</del>, by the Secretariat, or a Member of the Commission <del>sine die</del>. In the latter case, proposals should be received by the Secretariat in good time (not less than three months) before the session of the Commission at which they are to be considered. The proposal <u>for a new edition</u> should be accompanied by a project document (see Part 2 of the elaboration procedures) unless the Executive Committee or the Commission decides otherwise. <del>However, if the amendment proposed is of an editorial nature, the preparation of a project document is not required.</del></p>	
<p>Paragraphe 30:Le Sénégal appuie les propositions de changement dans ce paragraphe.</p>	<p><b>Senegal</b></p>
<p><del>In the case of an amendment of an editorial nature, it will be open to the Commission to adopt the amendment at Step 8 of the uniform procedure (see Part 3 of the elaboration procedures).</del></p> <p>While it is understood that the current practice is for the Codex Secretariat to address corrections immediately and inform the Commission of editorial changes to a standard, it is important that the Commission still have final 'say' over the adoption of corrections. This is done through the Commission adopting the amendment at Step 8; this concept should not be excluded from the text. If not included here, Canada suggests including this in the definition of 'correction' in paragraph 26 above.</p>	<p><b>Canada</b></p>
<p><del>In the case of an amendment of an editorial nature, it will be open to the Commission to adopt the amendment at Step 8 of the uniform procedure (see Part 3 of the elaboration procedures).</del></p> <p>Malaysia supports for this process be retained to avoid unintended consequences.</p>	<p><b>Malaysia</b></p>
<p>a) In the case of an amendment proposed and agreed upon by a subsidiary body, it will also be open to the Commission to adopt the amendment at Step 8 of the uniform procedure (see Part 3 of the elaboration procedures).</p> <p>Japan would like to seek clarification about "to adopt the amendment at Step 8 of the uniform procedure". The paragraph 31 b) of the 28th edition of the Procedural Manual states "Step 5" for the amendment, as adopted at CAC30 in July 2007 (ALINORM 07/30/REP, Appendix III). We would like to confirm whether "Step 8" is an original text or whether it is a new change in line with the current usual practice.</p> <p>Another question arises regarding "Step 5" in the current text in the Procedural Manual. CCGP24 in April 2007 prior to CAC30 agreed to include "Step 5 or Step 5/8" in this paragraph in order to expedite the development of standards when consensus existed in the subsidiary body concerned and the Commission (ALINORM 07/30/33, paragraph 141 and Appendix XI), and subsequently CAC30 agreed to adopt the text as proposed. However, "or Step 5/8" is not included in the Appendix III of the report and the Procedural Manual. We did not find the record that the Commission agreed to delete the term "or Step 5/8" We would like to confirm whether only "Step 5" is correct procedure for amendment.</p>	<p><b>Japan</b></p>
<p>Paragraphe 31:Le Sénégal appuie les propositions de changement dans ce paragraphe.</p>	<p><b>Senegal</b></p>
<p>a) In the case of an amendment proposed and agreed upon by a subsidiary body, it will also be open to the Commission to adopt the amendment at Step 8 of the uniform procedure (see Part 3 of the elaboration procedures).</p> <p>If it is a typo, it should be changed from "step 8" to "step 5", but if it is not a typo, "uniform procedure" does not need to be mentioned here.</p>	<p><b>Republic of Korea</b></p>
<p>b) <del>In other case of a new editions</del>, the Commission will approve the proposal as new work and the approved new work will be referred for consideration to the appropriate subsidiary body, if such body is still in existence. If such body is not in existence, the Commission will determine how best to deal with the new work.</p>	<p><b>Türkiye</b></p>

<p>Paragraph 31 of the proposal document should be clarified in detail. Because, the workflow related to the subjects of adjourned or abolished committees should not neglect the steps of the Codex standard elaboration process. It is necessary to explain in more detail the working procedure to be followed for the matters covered by the adjourned committees.</p>	
<p>b) In <del>other</del> case <u>of a new editions</u>, the Commission will approve the proposal as new work and the approved new work will be referred for consideration to the appropriate subsidiary body, if such body is still in existence. If such body is not in existence, the Commission will determine how best to deal with the new work.</p> <p>This should either be "In the case of a new edition..." or removal of "the" should be made point a), with respect to "the amendment".</p>	<p><b>ICUMSA</b></p>
<p>b) In <del>other</del> case <u>of a new editions</u>, the Commission will approve the proposal as new work and the approved new work will be referred for consideration to the appropriate subsidiary body, if such body is still in existence. If such body is not in existence, the Commission will determine how best to deal with the new work.</p> <p>Indonesia is of the view that further explanation is needed regarding the steps for revision so Indonesia proposes adding sentences "A new edition of a Codex standard would have to go through all steps of the procedure (with the possibility of omitting steps 6 and 7, as appropriate)"</p>	<p><b>Indonesia</b></p>
<p>Paragraph 32. Where Codex subsidiary bodies have been abolished or dissolved, or Codex committees have been adjourned <i>sine die</i>, the Secretariat keeps under review all Codex standards and related texts elaborated by these bodies and determines the need for any <u>corrections, amendments or new editions</u>, in particular those arising from decisions of the Commission. <del>If the need for <u>corrections of an editorial nature</u> is identified, then the Secretariat should prepare proposed amendments for</del> <u>makes the corrections and informs consideration and adoption</u> by the Commission <u>accordingly</u>. If the need for amendments <u>or a new edition</u> <del>a substantive nature</del> is identified, the Secretariat, in cooperation with the national secretariat of the adjourned committee if applicable, should prepare a working paper containing the reasons for proposing <del>amendments</del> <u>updates</u> and the wording of such <del>amendments</del> <u>updates</u> as appropriate, and request comments from Members of the Commission: a) on the need to proceed with such an <del>amendment</del> <u>update</u> and b) on the proposed <del>amendment</del> <u>update</u> itself. If the majority of the replies received from Members of the Commission is affirmative on both the need to amend the standard <u>or make a new edition</u>, and the suitability of the proposed wording for the amendment <u>or new edition</u> or an alternative proposed <del>ed</del> <u>ed</u> wording, the proposal should be submitted to the Commission for consideration and adoption. In cases where replies do not appear to offer an uncontroversial solution then the Commission should be informed accordingly, and it would be for the Commission to determine how best to proceed.</p> <p>Since the proposed changes to this section indicate that it is now related to 'amendments' and 'new editions', Canada suggests changing the language here to 'updates'. Otherwise, there may be confusion that the process laid out in the back half of this paragraph is only referring to one of the categories.</p>	<p><b>Canada</b></p>
<p>Paragraph 32. Where Codex subsidiary bodies have been abolished or dissolved, or Codex committees have been adjourned <i>sine die</i>, the Secretariat keeps under review all Codex standards and related texts elaborated by these bodies and determines the need for any <u>corrections, amendments or new editions</u>, in particular those arising from decisions of the Commission. <del>If the need for <u>corrections of an editorial nature</u> is identified, then the Secretariat should prepare proposed amendments for</del> <u>makes the corrections and informs consideration and adoption</u> by the Commission <u>for its consideration and adoption accordingly</u>. If the need for amendments <u>or a new edition</u> <del>a substantive nature</del> is identified, the Secretariat, in cooperation with the national secretariat of the adjourned committee if applicable, should prepare a working paper containing the reasons for proposing amendments and the wording of such amendments as appropriate, and request comments from Members of the Commission: a) on the need to proceed with such an amendment and b) on the proposed amendment itself. If the majority of the replies received from Members of the Commission is affirmative on both the need to amend the standard <u>or make a new edition</u>, and the suitability of the proposed wording for the amendment <u>or new edition</u> or an alternative proposed <del>ed</del> <u>ed</u> wording, the proposal should be submitted to the Commission</p>	<p><b>Canada</b></p>

<p>for consideration and adoption. In cases where replies do not appear to offer an uncontroversial solution then the Commission should be informed accordingly, and it would be for the Commission to determine how best to proceed.</p> <p>Please see Canada's comment on section paragraph 31 a).</p>	
<p>Paragraph 32. Where Codex subsidiary bodies have been abolished or dissolved, or Codex committees have been adjourned <i>sine die</i>, the Secretariat keeps under review all Codex standards and related texts elaborated by these bodies and determines the need for any <u>corrections</u>, <u>amendments</u> or <u>new editions</u>, in particular those arising from decisions of the Commission. If the need for <u>corrections of an editorial nature</u> is <u>identified</u>, then the Secretariat <del>should prepare proposed amendments for</del> <u>makes the corrections and informs consideration and adoption</u> by the Commission <u>accordingly</u>. If the need for <u>amendments</u> or <u>a new edition</u> <del>a substantive nature</del> is identified, the Secretariat, in cooperation with the national secretariat of the adjourned committee if applicable, should prepare a working paper containing the reasons for proposing amendments and the wording of such amendments as appropriate, and request comments from Members of the Commission: a) on the need to proceed with such an amendment and b) on the proposed amendment itself. If the majority of the replies received from Members of the Commission is affirmative on both the need to amend the standard <u>or make a new edition</u>, and the suitability of the proposed wording for the amendment <u>or new edition</u> or an alternative proposed <del>ed</del> <u>wording</u>, the proposal should be submitted to the Commission for consideration and adoption. In cases where replies do not appear to offer an uncontroversial solution then the Commission should be informed accordingly, and it would be for the Commission to determine how best to proceed.</p> <p>"If the need for corrections ..... makes the corrections and informs the Commission accordingly."</p> <p>It should be forwarded for Commission adoption at Step 8. See our comments on para 25 and 31.</p>	<p><b>Malaysia</b></p>
<p>Paragraph 32 of the proposal document should be clarified in detail. Because, the workflow related to the subjects of adjourned or abolished committees should not neglect the steps of the Codex standard elaboration process. It is necessary to explain in more detail the working procedure to be followed for the matters covered by the adjourned committees.</p>	<p><b>Türkiye</b></p>
<p>Paragraph 32. Where Codex subsidiary bodies have been abolished or dissolved, or Codex committees have been adjourned <i>sine die</i>, the Secretariat keeps under review all Codex standards and related texts elaborated by these bodies and determines the need for any <u>corrections</u>, <u>amendments</u> or <u>new editions</u>, in particular those arising from decisions of the Commission. If the need for <u>corrections of an editorial nature</u> is <u>identified</u>, then the Secretariat <del>should prepare proposed amendments for</del> <u>makes the corrections and informs consideration and adoption</u> by the Commission <u>accordingly</u>. If the need for <u>amendments</u> or <u>a new edition</u> <del>a substantive nature</del> is identified, the Secretariat, in cooperation with the national secretariat of the adjourned committee if applicable, should prepare a working paper containing the reasons for proposing amendments <u>or a new edition</u> and the wording of such amendments <u>or new edition</u> as appropriate, and request comments from Members of the Commission: a) on the need to proceed with such an amendment <u>or new edition</u> and b) on the proposed <del>amendment</del> <u>new wording</u> itself. If the majority of the replies received from Members of the Commission is affirmative on both the need to amend the standard <u>or make a new edition</u>, and the suitability of the proposed wording for the amendment <u>or new edition</u> or an alternative proposed <del>ed</del> <u>wording</u>, the proposal should be submitted to the Commission for consideration and adoption. In cases where replies do not appear to offer an uncontroversial solution then the Commission should be informed accordingly, and it would be for the Commission to determine how best to proceed.</p>	<p><b>European Union</b></p>
<p>Paragraphe 32: Le Sénégal appuie la nouvelle formulation du paragraphe 32.</p>	<p><b>Senegal</b></p>