



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Forty-seventh Session

CICG, Geneva, Switzerland

25– 30 November 2024

AMENDMENTS TO THE PROCEDURAL MANUAL

Inconsistencies in language, and superseded content of the PM, apart from Section 3

Background

1. The 33rd Session of the Committee on General Principles (CCGP33), when analysing the new format of the Codex Procedural Manual (PM) and observations on consistency and superseded content, agreed to ask for the approval of CAC46 to issue a Circular Letter (CL) soliciting proposals from Members on inconsistencies in language, and superseded content of the PM, apart from Section 3 (a Working Group by Host Secretariats is addressing the latter). Comments received in response would be considered by a future session of CAC for possible referral to CCGP.
2. CAC46 approved the issuance of a CL soliciting proposals from Members on inconsistencies in language, and superseded content of the PM, as described above.

Issuance of a circular letter

3. CL 2024/27-GP was issued in March 2024 with a deadline of 2 September 2024.
4. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/27-GP. Under the OCS, comments are compiled in the following order: General comments are listed first, followed by comments on specific sections.
5. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

Next steps

6. CAC47 is invited to:
 - a. note the comments received addressing language inconsistencies and translation errors as well as superseded content;
 - b. request the Codex Secretariat to consider language inconsistencies and translation errors and undertake follow-up as appropriate; and
 - c. request the Codex Secretariat to prepare a paper based on the comments on the possible superseded content for consideration by CCGP34 for their review and recommendations to CAC.

Annex I

Original language only

Comments in reply to CL 2024/27-GP

Comments by Chile, Colombia, Costa Rica, Ecuador, Egypt, European Union, Paraguay, Peru, Saudi Arabia, Senegal, Thailand, Uganda, United Arab Emirates, Uruguay, USA and ICUMSA

GENERAL COMMENTS

COMMENT	MEMBER/ OBSERVER
<p>Egypt appreciates the work which done in the translation of PM, and regarding to the Arabic version of PM.</p> <p>Egypt suggests to establish an ad hoc committee to review the translation of it as there are comments on some terms which may be differ from one Arabic country to the other, so that we have to uniform these terms.</p>	Egypt

SPECIFIC COMMENTS

COMMENT	MEMBER/ OBSERVER
Have you identified any language inconsistencies or translation errors in the PM? If so, can you be as specific as possible on the location of the inconsistency and its nature, and which language it concerns?	
No hemos identificado alguna incoherencia lingüística o error de traducción en el Manual de procedimiento.	Peru
No language inconsistencies identified in the Procedural Manual	Uganda
As an Arabic speaker country, United Arab Emirates reviewed the Arabic version of the PM and found not major inconsistencies with the original language (English). The main inconsistencies may affect the Reports of the Codex Committees as communicated to codex secretariat. Therefore, the updated versions should be communicated to member countries before the final publication.	United Arab Emirates
<p>The Member States of the European Union (MSEU) would like to propose the following answers to:</p> <p>Numbering: To facilitate cross-referencing between different texts of the Procedural Manual (PM), we propose to apply an extra level of numbering to the different texts included in each section. As an example, Section 2 could be numbered as follows: Section 1. Basic texts and definitions - Section 1.1. Statutes of the Codex Alimentarius Commission - Section 1.2. Rules of procedures of the Codex Alimentarius Commission - Etc. Section 2. Elaboration of Codex standards and related texts - Section 2.1. Procedures for the elaboration of Codex standards and related texts - Section 2.2. Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission - Etc. The same would apply to the remaining sections of the PM.</p> <p>References should also be updated accordingly in the body of the text, e.g. Section 2, paragraph 10, page 26: "Taking into account Section 2 Section 2.2: Criteria for the establishment of work priorities, the strategic plan [...]"</p>	European Union

<p>Additionally, texts located at this second level of numbering could also be referred as “sub-sections” for the sake of clarity and distinction with the main sections of the Manual (first level of numbering).</p> <p>Designations: Several entities are mentioned throughout the entire PM using different terms/designations. Such entities include in particular:</p> <ul style="list-style-type: none"> - Secretariat/Codex Secretariat / Joint FAO/WHO (Codex) Secretariat / Joint FAO/WHO Codex Secretariat. In order to facilitate the reading of the PM, it is proposed to use by default “Codex Secretariat”. The official designation could be used only for the first reference, i.e. Joint FAO/WHO Codex Secretariat (hereafter “Codex Secretariat”) or in the list of abbreviations. - Secretary of the Commission / Secretary of the CAC / Secretary, CAC, Joint FAO/WHO Food Standards Programme, FAO, Rome / Secretary. The PM could be reviewed in order to determine, on a case-by-case basis, whether it is necessary to refer to the Secretary or whether a reference to the Codex Secretariat is appropriate. - Member / Codex Member / Member of the Commission / Member of the Codex Alimentarius Commission / Nation / Member Nation / Government. - Coordinating committee / Regional coordinating committee - Joint FAO/WHO Food Standards Programme / Codex Alimentarius / Codex <p>Unless some of these terms have a specific meaning in certain context, a single designation should be chosen for each entity and used consistently in the different parts of the PM.</p> <p>Acronyms: The use of acronyms lacks consistency throughout the PM. A harmonized approach should be established and applied in a consistent manner. We propose the following approach:</p> <ul style="list-style-type: none"> - A given name is fully spelled out only once per sub-section, when first used, and its acronym is indicated in brackets next to it. - This acronym is then used in the rest of this sub-section until the next one. - When a name is only used once in a given sub-section, the acronym is not mentioned and only the full name is used. <p>We also propose two exceptions to these rules to facilitate reading:</p> <ul style="list-style-type: none"> - The acronyms of FAO and WHO can be used directly without spelling out their names first in a new sub-section. - The acronym CAC is not used and replaced by “the Commission”. <p>Articles before acronyms: The use of articles (a, an, the) before acronyms also lacks consistency. Sometimes, some acronyms are accompanied by an article (the CCFA, the JECFA etc.), sometimes they are not (∅ CCFA, ∅ JECFA). It is common practice not to use articles before acronyms when used as nouns (“CCFA may request JECFA...”). In contrast, articles are used when acronyms are used as qualifiers (“the JECFA evaluation...”).</p>	
<p>With regard to a., the United States has not identified any language inconsistencies or translations errors in the PM.</p>	<p>USA</p>
<p>Saudi Arabia are delighted to share our thanks and appreciation for the work done on the translation of the procedural manuals especially Arabic Language. Saudi Arabia is delighted as well to share the following comments:</p> <ul style="list-style-type: none"> • Saudi Arabia has noticed that the list of abbreviations and acronyms has only been included in the English version of the PM. The Arabic version of the PM does not contain the list. Saudi Arabia appreciates adding the list of abbreviations and acronyms along with their respective full meanings in both English and Arabic. For example; ADI (acceptable daily intake) “لوبيقمل ايجويلا لوانتمل ا”. The rationale: these abbreviations are most commonly used in codex meetings and documents. 	<p>Saudi Arabia</p>

<ul style="list-style-type: none"> In page 3 , section 6 The statement “with year of accession, where available” in the Arabic Language version “رفاوتي امدن ع مهمامضنا خيرات عم” is not precise, as the proposed phrase below is commonly used in Arabic “ل ت وف ره” eht ro phrase “رفوت لاح يف لفلذو” In page 7 , Article1- item C The statement “determining priorities and initiating and guiding the preparation of draft standards through and with the aid of appropriate organizations;” in the Arabic Language version " و اسد تهلال هذا الاعداد وت وجد بيه من خلال الامنظمات المناسدة وب معونتها". For more clarity, Saudi Arabia recommends to substitute it to the following phrase: "اصد فات وال بدء وال توجد يه في اعداد مسودة وملا عيراشم دادعاب ققل عتملا تايلول وال دي دحتو" مشاريع الاموا صد قات من خلال الامنظمات المناسدة وب معونتها". In page 7 , Article3 The statement “may, upon request communicated to the Director-General of FAO or WHO, as appropriate, attend sessions of the Commission and of its subsidiary bodies and ad hoc meetings as Observers.” in the Arabic Language version " ؤئهل تارود بقارم تفصرب رضحي نأ " For more clarity, Saudi Arabia recommends to substitute it to the following phrase: " ؤئهل تارود يف بقارم تفصرب رضحي نأ " In page 7 , Article5 The statement “for their information as soon as they become available.” in the Arabic Language version " لتأخذ به علماً " For more clarity, Saudi Arabia recommends to substitute it to the following phrase: " لفلذب قطاح الل " In page 19 in the Arabic Version ,para named “Codex maximum limit for residues of veterinary drugs (MRL)”,Saudi Arabia would like to add the word nettirw eht htiw ezinomrah ot dna ytiralc hcaer ot gk/gµ tinu eht ediseB مديكروغرام paragraph. In page 19 in the Arabic Version ,para named “Codex maximum limit for residues of veterinary drugs (MRL)”, Saudi Arabia would like to substitute the phrase "تافل خملل ي صرقأ دح دي دحت يدل "" To "تافل خملل ي صرقأ دح دي دحت دنح" " As it is suitable Grammarly. 	
<p>Thailand has observed inconsistencies in the terminology used for the Secretariat throughout Sections 2 and 7 of Procedural Manual (PM). To enhance clarity, we recommend adopting a consistent term and approach to referencing the Secretariat. These term and approach should clearly differentiate between the Secretariat of Codex and the Secretariat of the host country depending on the context.</p> <p>Moreover, we kindly request clarification on the continued use of the terms "proposed draft" and "draft" within the Codex working process. To streamline the document and ensure consistency, we would like to suggest either clearly defining "proposed draft" and “draft” within the PM entirely if these terms remain relevant, or defining only “draft” if Codex decides that identifying a formal step in the document is sufficient.</p> <p>Additionally, we would like to propose italicizing the term "mutatis mutandis" wherever it appears in the document to enhance readability and ensure proper identification of the Latin phrase.</p> <p>Finally, we have identified discrepancies in the current terminology used to describe document modifications. we suggest replacing "editorial," "substantive nature," and "revision" throughout the PM with the agreed-upon terms “correction”, “amendment” and “new edition” to achieve consistency.</p>	<p>Thailand</p>
<p>Page 28 Article 12 Remplacer "en" par "au" d) une évaluation au regard</p> <p>Page 19 Révision des normes Remplacer "a la responsabilité" par "peut" Chaque membre de la commission du Codex peut identifier et adresser...</p> <p>Page 19 Nature des normes: ajouter " sains , exempts d'adultération, barrer "qualité déloyale " Les normes Codex et textes apparentés comprennent des exigences auxquelles doivent répondre les aliments pour produits alimentaires sûrs et sains, exempts</p>	<p>Senegal</p>

<p>d'adultération , présentés et étiquetés de façon correcte. , barrer</p> <p>Page 19 Nature des normes codex ajouter pouvant se baser sur les normes codex La législation et les procédures de chaque pays contiennent des dispositions pouvant se baser sur des normes codex ...</p> <p>Page 18 Article 15 La Commission peut, à la majorité des deux tiers des suffrages exprimés, adopter des amendements ou des additifs ajouts au présent Règlement, à condition que la proposition d'amendement ou d'addition ait été communiquée 24 heures à l'avance. Remplacer le terme "additifs" par ajouts</p> <p>Page 15 Article 1" La Commission peut créer les types d'organes subsidiaries suivants: (a) les organes subsidiaires qu'elle juge nécessaires à l'accomplissement de sa tâche en ce qui concerne la mise au point définitive des projets de norme;" remplacer « mise au point définitive » par « finalisation » (b) les organes subsidiaires qu'elle juge nécessaires à l'accomplissement de sa tâche en ce qui concerne la finalisation des projets de norme;</p> <p>Page 8 Article 7 La Commission peut créer tels autres organes subsidiaires qu'elle juge nécessaire dans l'accomplissement de ses travaux, sous réserve de la disponibilité des fonds nécessaires. Remplacer tel par tout « La Commission peut créer tout autre organe subsidiaire qu'elle juge nécessaire dans l'accomplissement de ses travaux, sous réserve de la disponibilité des fonds nécessaires. »</p>	
<p>En primer lugar, Chile agradece a la secretaria de Codex por la labor realizada en la edición número 28 del Manual de Procedimiento, la cual refleja de muy buena manera las adiciones y enmiendas incorporadas. Con relación a su pregunta, no hemos identificado alguna incoherencia lingüística o error de traducción.</p>	Chile
<p>No se ha identificado incoherencias</p>	Paraguay
<p>Se considera útil unificar el lenguaje cuando aplique, en particular en lo que se refiere al uso de la palabra "enmienda", ya que se ha observado que se utiliza en varias secciones del manual, en las que consideramos relevante estudiar si es necesario utilizar en su lugar la palabra "modificación", partiendo de la base de que esta última incluye una: corrección, modificación o nueva edición de una norma, como se indica en el documento REP23_GP Apéndice III. Se considera importante aclarar si la nueva interpretación de la palabra "modificación", aplica también para los estatutos, o solo se va a utilizar para las Normas.</p> <p>Sección 1 Textos Fundamentales Y Definiciones Número de página: 13 Artículo VI párrafo 7 Idioma que afecta: español La mayoría de los miembros de la Comisión constituirá quorum a efectos de recomendar modificaciones a los Estatutos de la Comisión y de adoptar modificaciones al presente Reglamento, de conformidad con el artículo XV.I. En todos los demás casos, la mayoría de los miembros de la Comisión que asistan al período de sesiones constituirá quorum, siempre que esa mayoría no sea inferior al 20 % del número total de los miembros de la Comisión, ni conste de menos de 25 miembros. Además, en el caso de modificación o adopción de una norma propuesta para una región o grupo de países determinados, el quorum de la Comisión deberá incluir un tercio de los miembros que pertenezcan a dicha región o grupo de países.</p> <p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex</p>	Colombia

<p>Número de página: 31 Tramite 8 Idioma que afecta: español La Secretaría somete el anteproyecto de norma al Comité Ejecutivo para su examen crítico y a la Comisión para su adopción como proyecto de norma. Al adoptar una decisión en este trámite, la Comisión tomará en la debida consideración el resultado del examen crítico y las observaciones que le haya sometido cualquiera de sus miembros sobre las consecuencias que el anteproyecto de norma o cualesquiera disposiciones contenidas en este puedan tener para sus intereses económicos. Cuando se trate de normas regionales, todos los miembros de la Comisión pueden presentar sus observaciones, participar en el debate y proponer modificaciones, pero solo la mayoría de los miembros de la región o grupo de países interesados que asistan a la reunión puede decidir la modificación o adopción del proyecto. Al adoptar una decisión en este trámite, los miembros de la región o grupo de países interesados tomarán en la debida consideración las observaciones que les haya sometido cualquiera de los miembros de la Comisión sobre las consecuencias que el anteproyecto de norma o cualesquiera disposiciones contenidas en este puedan tener para sus intereses económicos.</p> <p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex Número de página: 32 Tramite 5 Idioma que afecta: español Cuando se trate de normas que habrán de ser objeto de un procedimiento de elaboración acelerado, la Secretaría someterá el anteproyecto de norma al Comité Ejecutivo para su examen crítico y a la Comisión, junto con cualesquiera propuestas recibidas por escrito de los miembros y de las organizaciones internacionales interesadas para que efectúe las modificaciones necesarias, con miras a su adopción como norma del Codex. Al adoptar una decisión en este trámite, la Comisión tomará en la debida consideración el resultado del examen crítico y las observaciones que le haya sometido cualquiera de sus miembros sobre las consecuencias que el anteproyecto de norma o cualesquiera disposiciones contenidas en este puedan tener para sus intereses económicos. Cuando se trate de normas regionales, todos los miembros y las organizaciones internacionales interesadas pueden presentar observaciones, participar en el debate y proponer modificaciones, pero solo la mayoría de los miembros de la región o del grupo de países interesados que asistan a la reunión puede decidir la modificación o adopción del proyecto.</p> <p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex Número de página: 41 Párrafo: 59 Idioma que afecta: español</p> <p>Los comités sobre productos del Codex examinarán la Norma general para los aditivos alimentarios (CXS 192-1995)², con miras a incorporar una referencia a la norma general. Todas las propuestas de modificaciones a la Norma general para los aditivos alimentarios² que tengan como objeto establecer una referencia a esta se remitirán al Comité del Codex sobre Aditivos Alimentarios (CCFA). El CCFA considerará tales propuestas para su ratificación. Las revisiones que afecten al contenido que sean ratificadas por el CCFA se remitirán al comité sobre productos, a fin de que ambos comités lleguen a un consenso en un estadio temprano del procedimiento de trámites.</p> <p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex Número de página: 43 Párrafo: 70 Idioma que afecta: español El CCCF examinará todas las propuestas de modificaciones a la Norma general para los contaminantes y las toxinas presentes en los alimentos y piensos³, así como de ratificación de las disposiciones propuestas, y adoptará las medidas que sean necesarias y pertinentes.</p>	
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<p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex Número de página: 45 Párrafo: 85 Idioma que afecta: español Cuando los comités de asuntos generales y los comités sobre productos establezcan disposiciones o recomendaciones en materia de inspección y certificación, deberán remitirse a los principios y directrices elaborados por el Comité del Codex sobre Sistemas de Inspección y Certificación de Importaciones y Exportaciones de Alimentos y efectuar las modificaciones que fueran oportunas y en las normas, directrices y códigos que sean de pertinencia de cada comité a la mayor brevedad posible.</p> <p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex Número de página: 50 Párrafo: 112 Idioma que afecta: español El CCFA podrá revisar las disposiciones sobre aditivos alimentarios de la Norma general para los aditivos alimentarios previa petición de los comités, los miembros o la Comisión del Codex Alimentarius. El órgano proponente proporcionará la información que justifique la modificación de dicha norma. La información de apoyo facilitada al CCFA deberá incluir, según corresponda, los siguientes elementos:</p> <p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex Número de página: 51 Párrafo: 116 Idioma que afecta: español El CCFA estudiará todas las modificaciones a la Norma general para los aditivos alimentarios² que propongan los comités, los miembros y la Comisión del Codex Alimentarius.</p> <p>Sección 2 Elaboración De Normas Y Textos Afines Del Codex Número de página: 58 Párrafo: 141 Idioma que afecta: español Si el CCFFP considera que la información presentada en esta fase es suficiente para aprobar la inclusión de la especie candidata, podrá acordar la inclusión sin requerir una evaluación adicional. En tal caso, el CCFFP entregará el proyecto de modificación a la norma a la Comisión para su adopción.</p>	
<p>No, no se ha encontrado ninguna incoherencia lingüística o error de traducción en el Manual de Procedimiento.</p>	<p>Uruguay</p>
<p>Página 20. Sección I: Textos de base y definiciones - PRINCIPIOS GENERALES DEL CODEX ALIMENTARIUS</p> <p>Naturaleza de las Normas del Codex</p> <p>En la versión español del MP28, se reemplaza el término “genuino” que se encuentra en el Manual de Procedimiento edición 27, por el término “sano”.</p> <p>En el contexto del mensaje que se quiere transmitir con el término “genuino” , se centra en la pureza, la calidad y autenticidad del producto por su composición.</p> <p>Costa Rica considera que el término “Sano” se refiere a que el alimento es beneficioso para la salud por su aporte a una dieta equilibrada, es decir, se centra en el impacto del alimento en la salud humana que promueve el bienestar y reduce el riesgo de enfermedades no transmisibles.</p> <p>La FAO define alimento sano al "alimento que aporta la energía y los nutrientes que el organismo necesita y además se encuentra libre de contaminación".</p>	<p>Costa Rica</p>

<p>Por lo expuesto, Costa Rica considera importante mantener el término "genuino" y eliminar el término sano.</p> <p>Finalmente, Costa Rica quisiera recordar la corrección editorial en la versión español del término "prácticas justas". En seguimiento al CRD08- Julio de 2024 presentado en la Vigésima tercera reunión del CCLAC.</p> <p>Página 23. Sección I: Textos de base y definiciones - DEFINICIONES PARA LOS FINES DEL CODEX ALIMENTARIUS. Página 21 del Manual edición 28.</p> <p>Definiciones. Aditivo alimentario:</p> <p>La definición entre la edición 27 y 28 del Manual de procedimiento refleja cambios menores. En ese sentido; para mejor concordancia entre los documentos del Codex, Costa Rica propone incluir la definición exacta de la norma general para los Aditivos Alimentarios. CODEX STAN 192-1995.</p> <p>En la versión español e inglés del Manual de Procedimiento edición 28. Página 21. Definiciones: Higiene de los alimentos, se agrega el término "sano".</p> <p>Costa Rica propone eliminarlo y mantener la redacción original.</p> <p>Justificación: Por lo antes expuesto.</p> <p>Página 22. Definiciones</p> <p>Límite máximo de residuos (LMR) de plaguicidas: eliminar "Comisión" y mantener de la Comisión del Codex Alimentarius</p> <p>Justificación: se repite el término Comisión.</p> <p>Página 112. Comunicación de riesgos</p> <p>Versión inglesa:</p> <p>b) promote consistency and transparency in formulating risk management optins/recommendations;</p> <p>Corregir optins por "options"</p>	
<p>El país considera que la traducción del Manual de procedimiento es bastante clara; sin embargo, podría presentarse en ciertos textos del documento la duda de que podrían ocuparse otras palabras o términos para mayor claridad del país; no obstante, esto no recae como alguna observación que sea estrictamente necesaria y que deba cambiarse</p>	Ecuador
<p>No inconsistencies observed and no further comments to add.</p>	ICUMSA
<p>Is there any content of the PM, apart from in Section 3, that you consider superseded and that would need a review, and why?</p>	
<p>None</p>	Uganda
<p>United Arab Emirates appreciates the approach adopted by CCGP regarding the review of the Codex Procedural Manual (PM) and recognizes the benefit of the transition to an exclusively electronic format. Regarding, Appendix II of REP23/GP, United Arab Emirates supports the review and modifications of the Procedural Manual.</p>	United Arab Emirates
<p>The MSEU propose a considerable number of specific comments related to sections and paragraphs of the Procedural Manual. As these comments are made in form of a table for ease of reference, they cannot be submitted via OCS. The MSEU have transmitted these specific comments to the Codex Secretariat by email. (see Appendix I)</p>	European Union

<p>With regard to b., superseded content, please see specific comments below in each section of the Procedural Manual.</p> <p>SECTION 1 BASIC TEXTS AND DEFINITIONS</p> <ul style="list-style-type: none"> • Rules of procedure of the Codex Alimentarius Commission (adopted in 1963 at the first session of the Commission. Amended in 1964, 1965, 1966, 1968, 1969, 1970, 1999, 2003, 2005, 2006 and 2007) (page 8) <ul style="list-style-type: none"> o Rule VI Sessions- Para 6 (or new para). Would we like to mention that the sessions may be webcast or hybrid? o Rule IX Observers- Para 2. we have had to register Palestine in the past as public, not Observer on the ORS. o Rule X Records and Reports – Para 2. The reports are no longer circulated to all Members but posted on the Codex website directly. o Rule XI. Subsidiary Bodies – Par 7. The DG's do not select the locations for the subsidiary bodies. o Rule XIV Languages- CCNASWP only operates in English so the language should be tweaked to reflect that. • General principles of the Codex Alimentarius (adopted in 1965. Amended in 1966, 1969, 1993, 1995 and 2007) (page 18) <ul style="list-style-type: none"> o Scope of the Codex Alimentarius: Propose deleting « presentation » after labelling <p>SECTION 2 Elaboration of Codex standards and related texts</p> <ul style="list-style-type: none"> • Procedures for the elaboration of Codex standards and related texts (page 25) <ul style="list-style-type: none"> o Para 9- Codex standards are not sent to governments.... o Para 11- It is not clear what the two year rolling bases review of the strategic plan means? o Part 3, Step 2-Why are milk and dairy products singled out and why is IDF mentioned? o Part 4, Step 1- 2/3 majority votes for accelerated procedure? o Part 5, Para 20- The standards are not « issued » to countries. o Part 5, Para 21- Do we have to refer to them as FAO Publications now under the new publishing rules? o Part 7- NEW TEXT ON AMENDMENTS AND REVISIONS- The proposed changes could affect a precedent that the Codex Committee on Food Additives (CCFA) has been following pertaining to the addition of food additives (or revision of maximum use levels) in commodity standards that were generated by a committee that is now sine die. <p>An example would be commodity standards that were put together by the Codex Committee on Milk and Milk Products (CCMMP), which is a committee that is now sine die. Many of the corresponding commodity standards have been aligned with the General Standard for Food Additives (GSFA), and thus now contain a general reference to the GSFA (rather than specific list of additives).</p> <p>In cases where a new additive that was not included in the original commodity standard is proposed to be added to the GSFA in a food category that would include the commodity standard, CCFA has taken the position (with support from the Codex Secretariat) that CCFA has the authority to permit the use of the new additive in commodity standards for which the originating committee is sine die. For cases where there is still an active commodity committee, we always make a request of the commodity committee before making a change.</p> <p>Would the proposed changes call in to question the practice that CCFA has been following pertaining to the new use of additives in commodity standards for which the originating commodity committee is sine die?</p> <p>Section 4 RISK ANALYSIS</p> <ul style="list-style-type: none"> • Risk analysis principles applied by the Codex Committee on Pesticide Residues (page 127) <ul style="list-style-type: none"> o Paras 219-224- The priority list now has a rolling submission and does not follow the prescribed dates necessarily. The Priorities EWG invitation also does not 	<p>USA</p>
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<p>wait until after the CAC to be issued.</p> <ul style="list-style-type: none"> o Para 246- JMPR report is not always available by February. <p>SECTION 5 SUBSIDIARY BODIES OF THE CODEX ALIMENTARIUS COMMISSION</p> <ul style="list-style-type: none"> • Table of committees, document references and terms of reference (page 163) o CCS has been adjourned again so it should be reflected that it has not been working by correspondence since 2011. <p>SECTION 6 MEMBERSHIP</p> <ul style="list-style-type: none"> • Core functions of Codex contact points (page 181) o Para 12 – CCP's do not receive final Codex texts; texts are downloaded from Codex Website. 	
<p>No encontramos contenido obsoleto del Manual de procedimiento que requiera revisión.</p>	<p>Peru</p>
<p>Chile considera que no existe otra sección que este obsoleta y que necesite una revisión.</p>	<p>Chile</p>
<p>No se ha identificado</p>	<p>Paraguay</p>
<p>Uruguay entiende que no es necesario hacer más revisiones del Manual de Procedimiento.</p>	<p>Uruguay</p>
<p>Costa Rica no tiene propuestas al respecto.</p>	<p>Costa Rica</p>
<p>Al respecto, el país considera que el contenido del Manual de procedimiento es apropiado y no requiere una revisión; sin embargo, de existir modificaciones al mismo se apoyará la decisión mayoritaria</p>	<p>Ecuador</p>

Additional comments from the Member States of the European Union (MSEU):

The Member States of the European Union (MSEU) would like to propose the following answers to:

Question a) Have you identified any language inconsistencies or translation errors in the PM? If so, can you be as specific as possible on the location of the inconsistency and its nature, and which language it concerns?

GENERAL COMMENTSNumbering

To facilitate cross-referencing between different texts of the Procedural Manual (PM), we propose to apply an extra level of numbering to the different texts included in each section. As an example, Section 2 could be numbered as follows:

Section 1. Basic texts and definitions

- *Section 1.1. Statutes of the Codex Alimentarius Commission*
- *Section 1.2. Rules of procedures of the Codex Alimentarius Commission*
- *Etc.*

Section 2. Elaboration of Codex standards and related texts

- *Section 2.1. Procedures for the elaboration of Codex standards and related texts*
- *Section 2.2. Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission*
- *Etc.*

The same would apply to the remaining sections of the PM.

References should also be updated accordingly in the body of the text, e.g. Section 2, paragraph 10, page 26:

*“Taking into account ~~Section 2~~ **Section 2.2**: Criteria for the establishment of work priorities, the strategic plan [...]”*

Additionally, texts located at this second level of numbering could also be referred as “sub-sections” for the sake of clarity and distinction with the main sections of the Manual (first level of numbering).

Designations

Several entities are mentioned throughout the entire PM using different terms/designations. Such entities include in particular:

- Secretariat/Codex Secretariat / Joint FAO/WHO (Codex) Secretariat / Joint FAO/WHO Codex Secretariat. In order to facilitate the reading of the PM, it is proposed to use by default “Codex Secretariat”. The official designation could be used only for the first reference, i.e. Joint FAO/WHO Codex Secretariat (hereafter “Codex Secretariat”) or in the list of abbreviations.
- Secretary of the Commission / Secretary of the CAC / Secretary, CAC, Joint FAO/WHO Food Standards Programme, FAO, Rome / Secretary. The PM could be reviewed in order to determine, on a case-by-case basis, whether it is necessary to refer to the Secretary or whether a reference to the Codex Secretariat is appropriate.
- Member / Codex Member / Member of the Commission / Member of the Codex Alimentarius Commission / Nation / Member Nation / Government.
- Coordinating committee / Regional coordinating committee
- Joint FAO/WHO Food Standards Programme / Codex Alimentarius / Codex

Unless some of these terms have a specific meaning in certain context, a single designation should be chosen for each entity and used consistently in the different parts of the PM.

Acronyms

The use of acronyms lacks consistency throughout the PM. A harmonized approach should be established and applied in a consistent manner. We propose the following approach:

- A given name is fully spelled out only once per sub-section, when first used, and its acronym is indicated in brackets next to it.
- This acronym is then used in the rest of this sub-section until the next one.
- When a name is only used once in a given sub-section, the acronym is not mentioned and only the full name is used.

We also propose two exceptions to these rules to facilitate reading:

- The acronyms of FAO and WHO can be used directly without spelling out their names first in a new sub-section.
- The acronym CAC is not used and replaced by “the Commission”.

See the specific comments below for corrections made in accordance with this approach.

Articles before acronyms

The use of articles (a, an, the) before acronyms also lacks consistency. Sometimes, some acronyms are accompanied by an article (the CCFA, the JECFA etc.), sometimes they are not (\emptyset CCFA, \emptyset JECFA).

It is common practice not to use articles before acronyms when used as nouns (“*CCFA may request JECFA...*”). In contrast, articles are used when acronyms are used as qualifiers (“*the JECFA evaluation...*”).

We also propose corrections to harmonize the use of these articles in the specific comments below.

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
Acronyms and abbreviations		X		GSCTFF General Standard for Contaminants and Toxins in Food and Feed	GSCTFF General Standard for Contaminants and Toxins in Food and Feed	The acronym GSCTFF is used only once in the entire Manual (see Section 4, paragraph 107, page 113). It is proposed to remove it and use the full name of the standard.
JEMNU		XI		Joint Expert Meeting on Nutrition	Joint FAO/WHO Expert Meeting on Nutrition	In line with the designation in para. 304, p154.
Section 1. Basic texts and definitions	Rules of procedure of the Codex Alimentarius Commission RULE IV - Coordinators	11	3.a	to appoint the Chairperson of the coordinating committee where such committee has been set up under Rule XI.1(b)(II) for the region or group of countries concerned	to appoint the Chairperson of the coordinating committee where such committee has been set up under Rule XI.1(b)(ii) for the region or group of countries concerned	typo
	Definitions for the purposes of the Codex Alimentarius	19		Codex maximum level for a contaminant in a food or feed commodity	Codex maximum level for a contaminant in a food or feed commodity (ML)	
Section 2. Elaboration of Codex Standards and related texts	Procedures for the elaboration of Codex standards and related texts	27	14 c) and d)	c) advice on the need for coordination of work between relevant,	c) advice on the need for coordination of work between relevant, d) Codex subsidiary bodies;	Letter c) and d) belong together.

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	<i>Part 2 Critical review</i>			<p>d) Codex subsidiary bodies;</p> <p>e) advice on establishment and dissolution of committees and task forces, including ad hoc cross-committee task forces (in areas where work falls within several committee mandates); and</p> <p>f) preliminary assessment of the need for expert scientific advice and the availability of such advice from FAO, WHO or other relevant expert bodies, and the prioritization of that advice.</p>	<p>ed) advice on establishment and dissolution of committees and task forces, including ad hoc cross-committee task forces (in areas where work falls within several committee mandates); and</p> <p>fe) preliminary assessment of the need for expert scientific advice and the availability of such advice from FAO, WHO or other relevant expert bodies, and the prioritization of that advice.</p>	
	<i>Part 3 Uniform procedure for the elaboration of Codex standards and related texts</i>	28	Step 2	the FAO Panel of Experts on Pesticide Residues in Food and the Environment and the WHO Core Assessment Group on Pesticide Residues (JMPR)	the <u>Joint FAO/WHO Meeting on Pesticide Residues</u> (JMPR)	Current designation of JMPR, aligned with the one used in the definition of Codex MRL for pesticide residues in Section 1 (p19).

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	<i>Part 4 Uniform accelerated procedure for the elaboration of Codex standards and related texts</i>	29	Step 2	the joint meetings of the FAO Panel of Experts on Pesticide Residues in Food and the Environment and the WHO Core Assessment Group on Pesticide Residues (JMPR), or the JECFA	the joint meetings of the FAO Panel of Experts on Pesticide Residues in Food and the Environment and the WHO Core Assessment Group on Pesticide Residues (JMPR), or the JECFA	JMPR's acronym has already been defined in the current sub-section. See general comments above on the use of acronyms and articles.
	Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission	33	33	When there is a proposal for the elaboration of a standard, code of practice or related text	When there is a proposal for the elaboration of a Codex standard, code of practice or related text	Footnote iii (p18) indicates that CoP are covered by the notion of related texts.
		33	33	or the revision of standards, codes of practice or other texts	or the revision of Codex standards, codes of practice or other related texts	
		33	35	The ad hoc intergovernmental task force shall report to the CAC	The ad hoc intergovernmental task force shall report to the CAC Commission	See general comments above.
	Criteria for the establishment of work priorities	34	40	When a Codex committee proposes to elaborate a standard, code of practice or related text	When a Codex committee proposes to elaborate a Codex standard, code of practice or related text	
	Relations between Commodity committees and	37	55	Codex general subject committees which include the Committees on Food	Codex general subject committees which include the Committees on Food	Consistent use of acronyms, see general comments above.

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	general subject committees			Labelling; Food Additives; Contaminants in Foods; Pesticides Residues; Residues of Veterinary Drugs in Foods; Food Hygiene; Methods of Analysis and Sampling; Nutrition and Foods for Special Dietary Uses; and Food Import and Export Inspection and Certification Systems	Labelling (CCFL) ; Food Additives (CCFA) ; Contaminants in Foods (CCCF) ; Pesticides Residues (CCPR) ; Residues of Veterinary Drugs in Foods (CCRVDF) ; Food Hygiene (CCFH) ; Methods of Analysis and Sampling (CCMAS) ; Nutrition and Foods for Special Dietary Uses (CCNFSDU) ; and Food Import and Export Inspection and Certification (CCFICS)	
		38	57-58	the Committee on Food Labelling	the Committee on Food Labelling CCFL	
		38 - 39	59 - 65	The CCFA	The CCFA	Consistent use of articles before acronyms, see general comments above.
		38	62	on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives concerning the safety-in-use	on the recommendations of the Joint FAO/WHO Expert Committee on Food Additives (JECFA) concerning the safety-in-use	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		38	63	the ADI assigned by the Joint FAO/WHO Expert Committee on Food Additives	the ADI assigned by the Joint FAO/WHO Expert Committee on Food Additives JECFA	
		39	67 - 70	a proposal should be prepared and forwarded to the Committee on Contaminants in Foods for consideration	a proposal should be prepared and forwarded to the Committee on Contaminants in Foods CCCF for consideration	
		39	71	provisions on residue limits of pesticides and of veterinary drugs adopted by the CAC	provisions on residue limits of pesticides and of veterinary drugs adopted by the CAC Commission	
		39	72	forwarded to the Committees on Pesticide Residues or on Residues of Veterinary Drugs in Foods as appropriate	forwarded to the Committees on Pesticide Residues CCPR or on Residues of Veterinary Drugs in Foods CCRVD as appropriate	
		40	73	Commodity committees should examine the provisions on food hygiene adopted by the CAC	Commodity committees should examine the provisions on food hygiene adopted by the CAC Commission	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		40	73	general reference above to the Committee on Food Hygiene for endorsement	general reference above to the Committee on Food Hygiene CCFH for endorsement	
		40 - 41	74 - 84	these should be referred to the Committee on Methods of Analysis and Sampling at Step 4	these should be referred to the Committee on Methods of Analysis and Sampling CCMAS at Step 4	
		41	82	The Committee on Food Additives is responsible	The Committee on Food Additives CCFA is responsible	
		41	83	The Committees on Pesticide Residues and Residues of Veterinary Drugs in foods	The Committees on Pesticide Residues and Residues of Veterinary Drugs in foods CCPR and CCRVDF	
		41	84	the Committee on Food Hygiene	the Committee on Food Hygiene CCFH	
		42	85	developed by the Committee on Food Import and Export Inspection and Certification Systems	developed by the Committee on Food Import and Export Inspection and Certification Systems CCFICS	
	Format for Codex Commodity standards	42	86	the subsidiary bodies of the CAC	the subsidiary bodies of the CAC Commission	
		43	92	general reference to the corresponding sections of the GSFA	general reference to the corresponding sections of the General Standard	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
					<u>for Food Additives (GSFA) (CXS 192-1995)²</u>	
		44	96	This section should contain only the following reference to the General Standard for Contaminants and Toxins in Food and Feed ³	This section should contain only the following reference to the General Standard for Contaminants and Toxins in Food and Feed <u>(CXS 193-1995)³</u>	
	Guidelines for the inclusion of specific provisions in Codex standards and related texts	46	109	The General Standard for Food Additives (GSFA) ²	The General Standard for Food Additives (GSFA) <u>(CXS 192-1995)²</u>	
		46	112	The food additive provisions of the GSFA may be revised by the Committee on Food Additives after requests submitted by Codex committees, Codex Members, or the CAC.	The food additive provisions of the GSFA may be revised by the <u>Codex</u> Committee on Food Additives <u>(CCFA)</u> after requests submitted by Codex committees, Codex Members, or the <u>CAC Commission</u> .	
		46 - 50	112 - 128	the Committee on Food Additives	the Committee on Food Additives <u>CCFA</u>	
		46	112(b)	a summary of the JECFA safety	a summary of the <u>Joint FAO/WHO Expert Committee</u>	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				evaluation of the food additive	on Food Additives (JECFA) safety evaluation of the food additive	
		46	113(a)	For additives with a numerical ADI	For additives with a numerical acceptable daily intake (ADI)	
		52	131	The <i>General Principles of Food Hygiene</i> ⁷ (including the Guidelines for the Application of the Hazard Analysis Critical Control Point (HACCP) System) and the <i>Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods</i> ⁸ are the base documents in the field of food hygiene.	The <i>General Principles of Food Hygiene (CXC 1-1969)</i> ⁷ (including the Guidelines for the Application of the Hazard Analysis Critical Control Point (HACCP) System) and the <i>Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods</i> ⁸ are the base documents in the field of food hygiene.	
	Procedure for the inclusion of additional species in Codex standards for fish and fishery products	52	135 - 162	the CAC	the CAC Commission	
		52	135 - 136	the CCFFP	the CCFFP	
	Principles for the establishment of	58	177 - 206	the CCMAS	the CCMAS	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	Codex methods of analysis					
	Principles for the establishment or selection of Codex sampling procedures	67 -68	?	(All text)	(All text)	The paragraphs of this sub-section are not numbered. This should be corrected.
		67 -68	?	The CCMAS	The CCMAS	
	Provisions on the use of proprietary methods in Codex standards	70	219	Codex committees may occasionally submit methods of analysis which are proprietary, or are based on proprietary aspects, to the CCMAS for endorsement.	Codex committees may occasionally submit methods of analysis which are proprietary, or are based on proprietary aspects, to the <u>Codex Committee on Methods of Analysis and Sampling (CCMAS)</u> for endorsement.	
Section 4 Risk analysis	Working principles for risk analysis for application in the framework of the Codex Alimentarius	99	2	The objective of these working principles is to provide guidance to the Codex Alimentarius Commission (CAC) and the Joint FAO/WHO expert bodies and consultations	The objective of these working principles is to provide guidance to the Codex Alimentarius Commission (CAC), <u>hereinafter referred to as “the Commission”</u> , and the Joint FAO/WHO expert bodies and consultations	For consistency with Sections 1 and 2.
		99 - 103	3 – 41	The CAC	The CAC <u>Commission</u>	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		102	29	MLs	MLs <u>maximum levels</u>	
	Risk analysis principles applied by the Codex Committee on Food Additives	105	42	This document addresses the application of risk analysis principles by the Codex Committee on Food Additives (CCFA) and the JECFA.	This document addresses the application of risk analysis principles by the Codex Committee on Food Additives (CCFA) and the <u>Joint FAO/WHO Expert Committee on Food Additives (JECFA)</u> .	
		106 - 108	48 - 64	the CAC	the <u>CAC Commission</u>	
		106	51	in the preamble and relevant annexes of the Codex GSFA. ²	in the preamble and relevant annexes of the <u>Codex General Standard for Food Additives (GSFA) (XCS 192-1995)</u> . ²	
		107	56	When establishing its standards, codes of practice, and guidelines	When establishing its standards, codes of practice, and guidelines <u>and related texts</u>	
	Risk analysis principles applied by the Codex Committee on Contaminants in Foods	109	76	This document addresses the applications of risk analysis principles by the Codex Committee on Contaminants in	This document addresses the applications of risk analysis principles by the Codex Committee on Contaminants in	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				Foods (CCCF) and the JECFA.	Foods (CCCF) and the <u>Joint FAO/WHO Expert Committee on Food Additives (JECFA)</u> .	
		109 - 112	79 – 98	The CAC	The <u>CAC Commission</u>	
		110	88	MLs	<u>Maximum Levels (MLs)</u>	
		111	90	<i>Codex General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995).</i>	<i>Codex General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995).</i> ³	Cross-reference note number 3 should be added.
		111	91	When establishing its standards, codes of practice, and guidelines,	When establishing its standards, codes of practice, and <u>guidelines, and related texts</u>	
	Policy of the Codex Committee on Contaminants in Food for Exposure Assessment of Contaminants and Toxins in Foods or Food Groups	113	107	The preamble of the GSCTFF	The preamble of the <u>GSCTFF Codex General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995)</u> ³	This acronym is only used once here in the entire Manual, apart from the list of acronyms and abbreviations where it should also be removed (page X)
		113	109	The purpose of this section is to outline steps in contaminant data selection and analysis undertaken by JECFA	The purpose of this section is to outline steps in contaminant data selection and analysis undertaken by <u>the Joint FAO/WHO Expert</u>	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
					<u>Committee on Food Additives</u> JECFA	
		113	110	Exposure assessments of contaminants and toxins in foods are performed by JECFA at the request of CCCF	Exposure assessments of contaminants and toxins in foods are performed by JECFA at the request of <u>the Codex Committee on Contaminants in Foods (CCCF)</u>	
		114	116	The CCCF determines criteria for selecting foods/food groups	The CCCF determines criteria for selecting foods/food groups	
	Risk analysis principles applied by the Codex Committee on Residues of Veterinary Drugs in Foods	116 - 120	124 - 153	the CAC	the CAC <u>Commission</u>	
		116	124	the JECFA	the <u>Joint FAO/WHO Expert Committee on Food Additives (JECFA)</u>	
		116 - 121	125 - 157	The CCRVDF	The CCRVDF	
		117	135	in accordance with WTO agreement	in accordance with WTO <u>the World Trade Organization</u> agreement	This acronym is not used in the rest of this section.

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		119	142	a temporary ADI	a temporary <u>acceptable daily intake (ADI)</u>	
	Risk assessment policy for residues of veterinary drugs in foods	126	159	to advise requests from the CCRVDF	to advise requests from the <u>Codex Committee on Residues of Veterinary Drugs in Foods (CCRVDF)</u>	
		126	159(a)	JECFA should use its risk assessment process for establishing acute reference doses (ARfD) or ADIs and proposing MRLs	JECFA should use its risk assessment process for establishing acute reference doses (ARfD) or <u>admissible daily intakes (ADIs)</u> and proposing <u>maximum residue limits (MRLs)</u>	
		126 -	159(a) – 159(h)	the CCRVDF	the CCRVDF	
		126	159(f)	a harmonized approach between JECFA and the JMPR	a harmonized approach between JECFA and the <u>JMPR Joint FAO/WHO Meeting on Pesticide residues</u>	This acronym is not used in the rest of this section.
	Risk analysis principles applied by the Codex Committee on Pesticide Residues	127 - 140	166 - 253	the CAC	the <u>CAC Commission</u>	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		127 - 141	167 - 265	the JMPR	the JMPR	Unless "JMPR" is used as a qualifier (e.g. " <i>the JMPR risk assessment</i> ").
		127 - 142	167 - 268	the CCPR	the CCPR	Unless "CCPR" is used as a qualifier (e.g. " <i>the CCPR session</i> ").
		127	167	in consultation with the JMPR joint secretaries	in consultation with the JMPR joint secretaries Secretariat	Harmonization of wording.
		128	168	estimating an ADI and an ARfD	estimating an <u>admissible daily intake (ADI)</u> and an <u>acute reference dose (ARfD)</u>	
		128	169	The FAO Panel of Experts on Pesticide Residues in Food and the Environment considers data on registered use patterns, fate of residues, animal and plant metabolism, analytical methodology and residue data derived from supervised residue trials in order to propose residue definitions and maximum residues levels for	The FAO Panel of Experts on Pesticide Residues in Food and the Environment considers data on registered use patterns, fate of residues, animal and plant metabolism, analytical methodology, <u>environmental studies as necessary or requested by risk managers</u> , and residue data derived from supervised	JMPR often looks to environmental data, e.g. in case of rotational crop studies to make use of Dt50 values.

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				the pesticide in food and feed.	residue trials in order to propose residue definitions and maximum residues levels for the pesticide in food and feed.	
		129	181	Where the exposure of livestock to pesticides through feeds leads to residues at the LOQ	Where the exposure of livestock to pesticides through feeds leads to residues at the <u>limit of quantification (LOQ)</u>	
		129	182	recommended by JMPR or the JECFA	recommended by JMPR or the <u>Joint FAO/WHO Expert Committee on Food Additives</u> JECFA.	This acronym is not used in the rest of this section.
		132	207	submit these data to the WHO	submit these data to the WHO	
		133	216	requests the re-establishment of the EWG on priorities	requests the re-establishment of the <u>electronic working group (EWG)</u> on priorities	
		135	226	c) commitment by the Member/Observer to provide supporting data for revcew with a firm date for data submission;	c) commitment by the Member/Observer to provide supporting data for revcew <u>review</u> with a firm date for data submission;	Typo

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		137	240(c)	the availability of current labels (authorized GAP)	the availability of current labels (authorized authorized GAP)	Typo
		138	244	the JMPR Joint Secretariat	the JMPR Joint Secretariat	Harmonization of wording.
		140	261	the JMPR Secretaries	the JMPR Secretaries Secretariat	
	Nutritional risk analysis principles and guidelines for application to the work of the Codex Committee on Nutrition and Foods for Special Dietary Uses	149	272	to provide guidance to the Codex Alimentarius Commission (CAC) and the Joint FAO/WHO expert bodies	to provide guidance to the Codex Alimentarius Commission (CAC), hereinafter referred to as “the Commission” , and the joint FAO/WHO expert bodies	
		149 - 154	272 - 304	the CAC	the CAC Commission	
		149	275	the work of the Committee on Nutrition and Foods for Special Dietary Uses	the work of the Committee on Nutrition and Foods for Special Dietary Uses CCNFSDU	
	Risk analysis principles and procedures applied by the Codex Committee on Food Hygiene	155 - 159	308 - 335	The CCFH	The CCFH	
		156 - 159	312 - 334	the CAC	the CAC Commission	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
Section 6. Membership	Core functions of Codex contact points	181		The numbering starts at 10	The numbering should start at 1	Typo
Section 7. Relations with other organizations	Guidelines on cooperation between the Codex Alimentarius Commission and international intergovernmental organizations in the elaboration of standards and related texts	185	1	These guidelines establish the modalities of cooperation between the Codex Alimentarius Commission (CAC) and international intergovernmental organizations	These guidelines establish the modalities of cooperation between the Codex Alimentarius Commission (CAC), <u>hereinafter referred to as “the Commission”</u> , and international intergovernmental organizations	
		185 - 186	3 - 13	The CAC	The CAC <u>Commission</u>	
	Principles concerning the participation of international non-governmental organizations in the work of the Codex Alimentarius Commission	187 - 190	14 -30	the CAC	the CAC <u>Commission</u>	
		189	26(e)	to the Secretary	to the Secretary <u>of the Commission</u>	Harmonization with previous uses. This designation could also be replaced by the Codex Secretariat if appropriate (see

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
						general comments above).
		189	27(b)	in cooperation with the Secretariat	in cooperation with the Codex Secretariat	
	Annex: Information required of international non-governmental organizations requesting observer status	191	4 - 12	the CAC	the CAC Commission	
		191	10	the regional coordinating committees and/or the national CCPs	the regional coordinating committees and/or the national CCPs Codex contact points	

Question b) Is there any content of the PM, apart from in Section 3, that you consider superseded and that would need a review, and why?**GENERAL COMMENTS**

The MSEU support a review of Section 2 “Procedures for the elaboration of Codex standards and related texts – Part 2: Critical review” in conjunction with Section 2 “Criteria for the establishment of work priorities” (the Criteria) and “Guidelines on the application of the criteria for the establishment of work priorities (criteria applicable to commodities)”.

Rationale: The way the content of Part 2 is presented and cross-referenced to the Criteria is not user-friendly and neither conducive to the critical review of new work by Members of CCEXEC nor to the actual preparation of proposals for new work (in the form of “project documents”) or their prioritization at committee level. The content and structure of those sections is also very likely to be superseded following the consideration of comprehensive guidance on new work and work prioritization (under preparation by the Codex Secretariat).

For example: Part 2: Critical Review requires the project document to contain “f) *information on the relation between the proposal and other existing Codex documents as well as other ongoing work*” and advises countries in a footnote (iv) that assistance could be sought from the Codex Secretariat to provide such information. Furthermore, in letter “d) *an assessment against the Section 2: Criteria...*” is required. In the criteria applicable to commodities, a quasi-duplication of f) can be found under letter “e) *coverage of the main consumer protection and trade issues by existing or proposed general standards*”. In the Guidelines on the application of this criteria (which only exist for commodities) the advice that Members may seek assistance from the Codex Secretariat in responding to the criteria is omitted.

Furthermore, it is not clearly visible which criteria are exclusively applicable to commodities. For some Codex standards/texts, it may also not be fully clear whether only criteria applicable to general subjects or those applicable to commodities should be complied with (e.g. CCNFDSU is general subject committee that may develop commodity or general subject standards).

An additional specific comment is made in relation to the “Part 2: Critical Review” requirement 12. i) on the proposed timeline in project documents.

Adoption at Step 5/8

The uniform step-process described in Section 2 lacks an explicit mention of an adoption at “Step 5/8”, as this modality is now used on a regular basis to expedite the approval standards or parts of standards. While Section 4 (Risk analysis) establishes a “Step 5/8-procedure” (paragraphs 246-251), it is only applicable to the adoption of pesticide MRLs.

We understand that paragraph 6 of Section 2 forms the procedural basis for an adoption at Step 5/8: “*The Commission may authorize, on the basis of two-thirds majority of votes cast, the omission of Steps 6 and 7, where such an omission is recommended by the Codex committee entrusted with the elaboration of the draft. [...] When formulating recommendations to omit Steps 6 and 7, Codex committees shall take all appropriate matters into consideration, including the need for urgency, and the likelihood of new scientific information becoming available in the immediate future.*”

However, this description no longer fully corresponds to the current use of an adoption at Step 5/8 as i) consensus is the basis in our decision-making process, and ii) it is mostly motivated by flexibility reasons rather than urgency or scientific aspects.

We suggest that this paragraph and the Uniform procedure (Part 3) be re-drafted to better reflect the current practices. Consequential amendments of other parts of the Manual may also be needed and should be considered.

Working groups established under the Commission

The Procedural Manual does not explicitly mention the possibility for the Commission to establish EWGs under its responsibility. The *Guidelines on electronic working groups* (Section 3), only mention EWGs as being established by Codex committees.

This possibility could be either added in the *Criteria for the establishment of subsidiary bodies of the Codex Alimentarius Commission* (Section 2), or the *Guidelines on electronic working groups* (Section 3), or both.

Core function of CCPs

Core functions of Codex contact points (Section 6) is outdated, especially paragraphs 12 and 17 as Codex texts and working documents are now exclusively online. Paragraph 16 (registration to Codex meetings) is not aligned with paragraph 14 of Section 3: *Guidelines to host governments of Codex committees and ad hoc intergovernmental task forces* currently under review by host secretariats. In-depth revision of this text would be welcome.

Furthermore, following the recommendation of CCGP33 and the decision of CAC46 to move the section on Membership from the Procedural Manual to the Codex website, the *Core functions of Codex contact points* would remain the only text in Section 6: Membership. A new location for this text should be reflected upon.

Work by correspondence

In light of the experience of the use of virtual meetings and the recognition that they are useful tool that are now available to progress Codex work, the EUMS suggest to proceed to an in-depth review of the modality and the relevance of working by correspondence.

Adaptation to the current working modalities

The use of the Online Commenting System (OCS) has modified the organisation of Codex work in a way that is not always accurately reflected in the Procedural Manual.

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
Section 2. Elaboration of Codex Standards and related texts	Procedures for the elaboration of Codex standards and related texts <i>Part 2 Critical review</i>	26	12(i)	the proposed timeline for completion of the new work, including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years.	the proposed timeline for completion of the new work, including the start-date, <u>the number of sessions foreseen to develop the standard and the year of finalisation;</u> the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years <u>and contain an indication of the session of the Commission approving the work and finally adopting the standard or related text.</u>	The time frame is now determined in reference to sessions of the Commission and/or the concerned subsidiary body. The proposed date for adoption at Step 5 is not usually stated.
		28	19(b)(ii)	to ensure that the requirements of the endorsement procedure have been fulfilled, where appropriate;	to ensure that the requirements of the endorsement procedure have been fulfilled, where appropriate;	This “endorsement procedure” is only mentioned here in the entire Manual. It may be a leftover from the former “acceptance procedure” that was

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
						removed from the 15th edition of the Manual. In any case, this provision should be removed.
	<i>Part 3 Uniform procedure for the elaboration of Codex standards and related texts</i> & <i>Part 4 Uniform accelerated procedure for the elaboration of Codex standards and related texts</i>	28 & 30	Step 3	The proposed draft standard is sent to Members of the Commission and interested international organizations	The proposed draft standard is sent by the Codex Secretariat to Members of the Commission and interested international organizations	The role of the Codex secretariat in transmitting the proposed draft standard could be added.
	<i>Part 6 Subsequent procedure concerning publication and possible extension of territorial application of the standard</i>	30	Title	<i>Subsequent procedure concerning publication and possible extension of territorial application of the standard</i>	<i>Subsequent procedure concerning publication and possible extension of territorial application of the standard</i>	See comment below.
		30	22	The Codex regional standard is published and issued to all Members and Associate Members of FAO and/or WHO	The Codex regional standard is published and issued to all Members and Associate Members of FAO and/or WHO	Paragraph 22 is redundant with paragraph 20, which applies equally to global and regional standards. It does not provide specific

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				and to the international organizations concerned.	and to the international organizations concerned.	provisions for regional standards to be published differently from worldwide Codex standards. It is proposed to suppress this paragraph and remove the reference to publication in the title of part 6.
		31	23(b)(ii)	When the relevant commodity committee is not active: When the commodity committee concerned is not active (i.e. not holding physical sessions), the proposal for conversion of a regional standard	When the relevant commodity committee is not active: When the commodity committee concerned is not active (i.e. not holding physical sessions); the proposal for conversion of a regional standard	Redundant, and committees can still be active while not holding physical sessions (e.g. committees working by correspondence, or virtual sessions of committees).
	Principles for the establishment or selection of Codex sampling procedures	68	Last paragraph	Methods of analysis which have already been printed as official methods of analysis in other available publications	Methods of analysis which have already been printed published as official methods of analysis in other available publications	Obsolete term.
Section 4 Risk analysis	Risk analysis principles applied by	133	218	The schedules and priority lists are	The schedules and priority lists are	The management of unsupported

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
	the Codex Committee on Pesticide Residues			<p>provided in the following tables:</p> <p>a) Table 1 – CCPR proposed schedule and priority lists of pesticides (new pesticides, new uses, and other evaluations).</p> <p>b) Table 2A – Schedule and priority lists of periodic reviews.</p> <p>c) Table 2B – Periodic review list (pesticides that have been last evaluated 15 years ago or more, but not yet scheduled or listed, 15-year rule).</p> <p>d) Table 3 – Record of periodic review.</p> <p>e) Table 4 – Pesticide/Food combinations for which specific GAP is no longer supported.</p>	<p>provided in the following tables:</p> <p>a) Table 1 – CCPR proposed schedule and priority lists of pesticides (new pesticides, new uses, and other evaluations).</p> <p>b) Table 2A – Schedule and priority lists of periodic reviews.</p> <p>c) Table 2B – Periodic review list (pesticides that have been last evaluated 15 years ago or more, but not yet scheduled or listed, 15-year rule).</p> <p>d) Table 3 – Record of periodic review.</p> <p>e) Table 4 – Pesticide/Food combinations for which specific GAP is no longer supported.</p> <p>f) <u>Table 5 – Unsupported compounds</u></p>	<p>compounds is now a recurring item on the agenda of CCPR.</p> <p>CCPR54 (2023) notably adopted an information document for the management of unsupported compounds, and the schedules and priority lists for JMPR now include a 5th table dedicated to such compounds.</p>

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
		134	220	In early September of each year, the EWG Chair will issue a broadcast email to Members/Observers	In early September of each year, the EWG Chair will issue a broadcast email message to Members/Observers	The EWG on priorities operate on the EWG forum. As such, the request for new compounds is not done anymore by an email. The word message is inclusive of all types of communication.
Section 7. Relations with other organizations	Principles concerning the participation of international non-governmental organizations in the work of the Codex Alimentarius Commission	189	26(a)	An organization in observer status: a) shall be entitled to send an Observer (without the right to vote) to sessions of the Commission, who may be accompanied by advisers; to receive from the Secretary of the Commission, in advance of the session, all working documents and discussion papers; to circulate to the Commission its views in writing, without	An organization in observer status: a) shall be entitled to send an Observer (without the right to vote) to sessions of the Commission, who may be accompanied by advisers; to receive from the Secretary of the Commission, in advance of the session, all working documents and discussion papers; to circulate to the Commission its views in writing, without	Non applicable anymore as working documents and discussion papers are made available to Members, Observers and public through the Codex website and are not directly distributed.

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				abridgement; and to participate in discussions when invited by the Chairperson	abridgement; and to participate in discussions when invited by the Chairperson	
		189	26(b)	b) shall be entitled to send an Observer (without the right to vote) to sessions of specified subsidiary bodies, who may be accompanied by advisers; to receive from the secretariats of the subsidiary bodies, in advance of the session, all working documents and discussion papers; to circulate to these bodies its views in writing, without abridgement; and to participate in discussions	b) shall be entitled to send an Observer (without the right to vote) to sessions of specified subsidiary bodies, who may be accompanied by advisers; to receive from the secretariats of the subsidiary bodies, in advance of the session, all working documents and discussion papers; to circulate to these bodies its views in writing, without abridgement; and to participate in discussions when invited by the Chairperson	

SPECIFIC COMMENTS						
Section	Sub-section	Page number	Paragraph	Current text	Proposed change	Rationale
				when invited by the Chairperson		
			26(c)	c) may be invited by the Directors-General to participate in meetings or seminars on subjects organized under the Joint FAO/WHO Food Standards Programme which fall within its fields of interest, and if it does not so participate, it may submit its views in writing to any such meeting or seminar	c) may be invited by the Directors-General to participate in meetings or seminars on subjects organized under the Joint FAO/WHO Food Standards Programme which fall within its fields of interest, and if it does not so participate, it may submit its views in writing to any such meeting or seminar	Seminars are only mentioned in this paragraph in the entire Manual and have no definition. This term is not used on a regular basis in Codex work.
	Annex: Information required of international non-governmental organizations requesting observer status	191	13	Languages (English, French or Spanish) in which documentation should be sent to the INGO.	Languages (English, French or Spanish) in which documentation should be sent to the INGO.	Non applicable anymore.