

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
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World Health  
Organization

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Agenda Item 14

CX/FL 23/47/14

March 2023

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

### Forty-seventh Session

Palais des Congrès, Gatineau, Canada

### APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF THE WORK OF CCFL

#### Analysis of comments in reply to CL 2022/73/OCS-FL and amendment proposals

Prepared by the CCFL Secretariat

#### Introduction

1. The 70<sup>th</sup> Session of Executive Committee (CCEXEC70) recommended that all Committees consider the need to develop an approach for the management of their work, similar to that used by the Codex Committee on Food Hygiene (CCFH)<sup>1</sup>.
2. At the 43<sup>rd</sup> Session of Codex Committee on Food Labelling in 2016 (CCFL43), the Committee noted that there was no need to develop an approach for the management of the work of CCFL similar to CCFH, as at that time, the existing work load did not warrant such a work plan but could consider this need in the future. The Committee also agreed that Canada would prepare a paper on future work to be kept current at each session, and that a prioritization approach could be considered once the paper was developed.<sup>2</sup>
3. CCFL44 considered the discussion paper on future work and direction for CCFL and agreed that India would update the paper and develop a prioritization approach. In this context, information was sought from Members through a circular letter (CL 2018/49-FL).<sup>3</sup>
4. CCFL45 considered a proposal for a draft approach and criteria for evaluation and prioritization of new work for CCFL, which included an illustrative application of the criteria. After discussion and exchange of views, the Committee agreed to request comments on the proposed draft approach and criteria through a circular letter (CL 2020/09/OCS-FL) for further consideration at CCFL46.<sup>4</sup> Comments in response to CL 2020/09/OCS-FL were received from 11 Members countries<sup>5</sup>.
5. In view of the postponement of CCFL46 due to the COVID-19 pandemic, and to benefit from the additional time to continue to progress the work, the CCFL Secretariat considered comments submitted in response to the circular letter. To facilitate consideration by the Committee, an updated proposal of the draft Approach and Criteria for Evaluation and Prioritization of the Work of CCFL was prepared (CX/FL 21/46/13 Add.1).
6. Due to time constraints, CCFL46 was not able to consider the updated proposal and agreed that comments should be requested through [CL 2022/73/OCS-FL](#) and that the CCFL Secretariat would then prepare a new revised proposal for consideration by CCFL47 based on comments received through the CL and all

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<sup>1</sup> REP 15/EX, paragraph 22

<sup>2</sup> REP16/FL, paragraphs 6 and 71

<sup>3</sup> REP18/FL, paragraph 63 (a)

<sup>4</sup> REP19/FL, paragraph 132 (e)

<sup>5</sup> Australia, Canada, Costa Rica, Cuba, Egypt, New Zealand, Nicaragua, Nigeria, Peru, Thailand, USA

written comments submitted to CCFL46<sup>6</sup>. Comments in response to CL2022/73 were received from 14 Member countries and 1 Member organization available [here](#).<sup>7</sup> A revised updated proposal is in Annex I.

### Summary and analysis of comments

7. Based on the written comments submitted at CCFL46 and comments received through the CL, there is general support on the need for a CCFL process to evaluate and prioritize new work proposals, specifically that it would be used/applied when there are multiple proposals. While most agreed that a flexible approach to establish an *ad hoc* working group, as needed, a few concerns were expressed on the modality and its composition.
8. Regarding the two options for the development of prioritization criteria specific to CCFL, most supported Option 1, (Using the framework as presented in Annex I, which provides flexibility on how to apply prioritization criteria specific to CCFL, to help guide discussions and evaluate new work proposals by an *ad hoc* working group).
9. Specific comments were provided on the proposed approach and criteria. Comments related to the proposed criteria and rating values were incorporated with the changes tracked in the updated document in Annex I. Specifically the following revisions and comments were made:
  - a. Scope: The reference to the Codex Strategic Plan was added to the second paragraph of the Scope. This resulted in repetition in the first sentence in paragraph 4 of the framework in Annex I, and it is proposed this first sentence be deleted.
  - b. Criteria: have been framed around the potential impact of the work through the addition of a new column in the criteria table entitled "Criterion" and the column previously entitled "Criterion" changed to "Further Information";
  - c. *Ad hoc* working group: Its establishment was moved from paragraph 11 to the new paragraph 6 bis, with a brief explanation as to when it could meet and what it would do.
10. Other specific comments raised that were not incorporated into the updated document that may require further consideration by the Committee include, whether there is a need:
  - a. to move the text regarding additional criteria from paragraph 10 to the Scope;
  - b. to retain the first criteria (relevance to CCFL)
  - c. to merge the third and fourth criteria (i.e. false, misleading or deceptive labelling practices; and informed consumer choice) into one as they appear to cover the same consideration and to avoid double weighting to this aspect during assessment;
  - d. for a numerical value rating scale to assist in distinguishing similarly rated work, clarify whether "low" rating includes "no potential impact" and to establish an overall rating;
  - e. to confirm the modality of the *ad hoc* working group envisioned e.g. an in-session working group in the margins of CCFL;
  - f. to apply the process to all new work proposals and current existing work at each meeting.

### Recommendations

11. The Committee is invited to:
  - a. re-confirm the need for a prioritization process for CCFL new work proposals and support a prioritization process that should only be applied when there are multiple new work proposals, taking into account the summary of comments in paragraph 7 above.
  - b. support using a flexible approach to establish an *ad hoc* working group, as needed, that could be tasked with discussing, evaluating and prioritizing the new work proposals, and making recommendations to CCFL.

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<sup>6</sup> Dominican Republic (CRD18), EU (CRD17), Mali (CRD 21), Nigeria (CRD9), Thailand (CRD10)

<sup>7</sup> CX/FL 23/47/14: Comments from Australia, Canada, Chile, Colombia, Egypt, EU, Iraq, New Zealand, Peru, Saudi Arabia, South Africa, Switzerland, Thailand, United Kingdom and Uruguay

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- c. confirm that the Committee would focus efforts using the framework as presented in Annex I, which provides flexibility on how to apply prioritization criteria specific to CCFL, to help guide discussions and evaluate new work proposals by an *ad hoc* working group (Option 1).
  - d. Consider the proposal in Annex I of this document on an updated draft approach and criteria for evaluation and prioritization of new work, taking into account the comments summarized in paragraphs 7 to 10 above.

## ANNEX I

**APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF THE WORK OF CCFL**  
**(Proposed amendments in response to comments from CL 2022/73/OCS-FL)**

**Purpose:**

1. The following guidelines are established to assist the CCFL to identify, prioritize and efficiently carry out its work, as needed, when there are multiple new work proposals to consider.

**Scope:**

2. These guidelines apply, ~~as needed,~~ to new work proposed to the CCFL and lays down criteria and a process/procedures for considering/evaluating the priority/ies of new work proposals ~~for proposed work,~~ including the revision of current texts.
3. The prioritization approach has been developed in recognition of addition to the criteria for new work as outlined in the *Procedural Manual*. Additional cCriteria relevant to the work of the CCFL and athe rating scheme have been developed, taking into account the mandate of the Codex Alimentarius Commission, the priorities outlined in the Codex Strategic Plan, and the general principles of food labelling included in the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) (GSLPF).

**Additional cCriteria for evaluating and prioritizing new work**

4. In addition to the priorities established by the Commission in the Strategic Plan, and the criteria applicable to general subjects specified in the Procedural Manual, additional criteria may be used/are required for the assessing/menting of the new work proposed/relevant to the CCFL. The following are the additional criteria against which the new work to be undertaken in CCFL may be assessed:

<u>Criterion</u>	<u>Criterion</u> <u>Further information</u>	<u>Rating</u>
<u>Relevance to CCFL mandate</u>	Does the proposed new work <u>fit within/fall under</u> the terms of reference of CCFL?	Yes/No/Partially
<u>Impact on consumer health</u>	Potential of new work to <u>resolve, mitigate, prevent, or significantly reduce or resolve</u> a consumer health risk	High Medium Low
<u>Addresses false, misleading or deceptive labelling practices</u>	Potential of the new work to <u>resolve, mitigate, prevent, or significantly reduce or resolve</u> false, misleading or deceptive labelling practices	High Medium Low
<u>Impact on consumer's ability to make an informed choice</u>	Potential of <u>the proposed</u> new work to assist the consumer in making an informed choice	High Medium Low
<u>Impact on trade practice</u>	<u>Positive</u> <del>impact</del> <del>(positive)</del> on international trade	High Medium Low

**Process for evaluating new work**

5. As with normal Codex procedures, nNew wWork Pproposals should be presented to CCFL in the format of a project document addressing the criteria given under the "*Criteria for establishment of work priorities*" for general subjects in the *Procedural Manual*. Additionally, the proposal and should preferably also include a self-assessment, including supporting rationale and references, that takes into account the additional criteria outlined in this document.

6. ~~The n~~New work proposals should also indicate ~~whetherthat~~ the work, if approved to commence, would likely lead to preparation of a new Codex text or revision of an existing Codex text.

~~6. bis. It may be appropriate for CCFL to establish an ad hoc working group, particularly in cases where multiple proposals are under consideration, that could be tasked as necessary, to evaluate and prioritize new work proposals. The ad hoc working group could take place during CCFL as an in-session working group tasked to make recommendations to CCFL.~~

~~4.7. As necessaryrequired, CCFL maywill prioritize new work proposals andincluding revisions of existing texts, taking into account the self-assessment in order of merit based upon decisions made by CCFL after assessing the new work proposals and/or recommendations of the ad hoc working group against the criteria (as defined above) for evaluating and prioritizing work.~~

~~5.8.~~ The Committee may reassess the priority of each item if new information becomes available relating to an item. Such ~~data information~~ may be submitted for consideration and the priority for the new work proposal reconsidered.

~~6.9. Ideally, t~~The criteria ~~shouldwill~~ be applied in a stepwise manner, in the order set out in the criteria above. If the Committee decides that a proposed work does not fall under the terms of reference of CCFL, then the remaining criteria do not need to be ~~appliedassessed~~.

~~7.10.~~ The proposed work should be assessed against the criteria as per the ratings given for each criterion. New work proposals will ultimately be prioritized as per the overall rating received through this prioritization process. Additional criteria, such as feasibility of the proposed new work, may be necessary and developed later for application while considering two or more items of similar priority.

~~8.11.~~ The CCFL will maintain the inventory of future work and emerging issues discussion paper that will include all potential work items relevant to CCFL. The inventory paper will be kept current at every session with a different Codex member taking on responsibility each time. ~~It may be appropriate for CCFL to establish an ad hoc working group, as necessary, to evaluate and prioritize new work proposals.~~