



Agenda item 6

CRD 3
February 2016
ORIGINAL LANGUAGE ONLY

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-second Session

Melbourne, Australia, 6-12 February 2016

REVISION OF THE PRINCIPLES AND GUIDELINES FOR THE EXCHANGE OF INFORMATION IN FOOD SAFETY EMERGENCY SITUATIONS

(CAC/GL 19-1995)

(Comments from European Union and its Member States (EUMS), El Salvador, Kenya, Mexico,
New Zealand, Philippines, Uruguay)

EUROPEAN UNION AND ITS MEMBER STATES (EUMS)

The European Union and its Member States (EUMS) would like to submit the following comments:

General comments

1. The EUMS consider that the scope of the paper should be limited to the exchange of information in food emergency situations and not extended to cover the management of such emergencies.

Management of food safety emergencies falls outside the scope of the original document CAC/GL 19-1995. While we believe there is merit in attempting to establish guidelines that encompass and go beyond the exchange of information, management of such emergencies requires taking a multipronged approach, largely depending on the level of protection chosen by the importing country.

2. The EUMS believe a reference to INFOSAN to be relevant in the actual context. However, currently, Annex 2 does not seem to cover the wealth of information that should be exchanged in case of emergency, such as a reference to affected or potentially affected groups and to the actions taken by the exporting and/or importing country. We do not have a preference for either Annex I or II, as long as a reference to INFOSAN is included together with all the necessary information that needs to be exchanged.

In case of emergency situations, the information exchanged should be as complete and comprehensive as possible.

Specific comments

Section 5 – Stakeholders and their respective role

The EUMS would suggest the following modification to Section 5

Paragraph 5.1 Competent Authorities, should read:

13. The information to consumers should concern, in particular, health effects on the most sensitive groups (children, elderly people and people with reduced immune system), and how the affected food/foods can be identified and handled in order to reduce further spreading of risk (e.g.

information to travellers about food in luggage).

(The remaining part of the text should be numbered accordingly.)

Paragraph 5.3. Food Business Operators

The EUMS propose the following modification to paragraph 15:

“15. In relation to food receipt, a food business operator must be able to provide information about what food it has on the premises and where it came from **and to whom it has been supplied.**”

This section specifies that a recipient shall be able to document from where it got the food item and if some of it is still in stock. The EUMS believe that it is relevant for the effective tracing of a food item that the food business operator is able to specify to whom the food item has been supplied.

Paragraph 5.4 Consumers, should read:

16. Consumers can enhance both their personal health and public health in general by adhering to, remaining informed of and following food safety-related instructions that have a role in managing those aspects of food safety emergencies which are under their control. They should be provided with information on how to achieve this. Multiple methods of providing such information to consumers should be **devised** prepared by the authorities **and by the relevant business operators.** ~~The information should concern health effects on the most sensitive groups (children, elderly people and people with reduced immune system) and how the affected food/foods can be identified and handled in order to reduce further spreading of risk (e.g. information to travellers about food in luggage).~~

While ideally consumers should be aware of what they consume and how, it is essential to give consumers adequate information in the event of food safety emergencies, as provided for by the relevant national legislation. Responsibilities for providing information to consumers lay with the competent authorities and the food business operators.

EL SALVADOR

El Salvador agradece el documento preparado por el Grupo de trabajo electrónico presidido por Unión Europea y Chile.

Observaciones generales:

Revisar el texto del documento, de manera que el “debería” pase a “debe”. Se apoya la propuesta hecha por Ecuador en el documento CX/FICS 16/22/5 Add. 1

Observaciones específicas:

Párrafo 12. Por lo tanto, las autoridades competentes ~~deberían~~ **deben** proporcionar información clara, pertinente, concreta y oportuna sobre el estado de la emergencia alimentaria a su industria, consumidores y otras partes interesadas, así como a los medios de difusión. También puede ser útil la elaboración de un plan de comunicación que incluya las redes sociales **oficiales de las Autoridades competentes.**

Párrafo 16: Mover el siguiente texto:

“Las autoridades ~~deberían~~ **debe** disponer de métodos múltiples para proporcionar dicha información a los consumidores. La información ~~debería~~ **debe** centrarse en los efectos perjudiciales para la salud de los grupos más sensibles (niños, ancianos, **embarazadas, discapacitados** y personas con inmunodeficiencias) y la manera de identificar y manipular el alimento o alimentos afectados a fin de minimizar la propagación del riesgo (por ej. información a los viajeros sobre el transporte de alimentos en el equipaje).”

Hacia el Punto: 5.1 Autoridades competentes, ya que se considera responsabilidad de la Autoridad competente no del consumidor.

ANEXO ORIGINAL:

Punto 1, viñeta 6: otros peligros identificados (por ej. sustancias químicas inherentes a los alimentos o producidas durante su elaboración, fallas en la elaboración/ envasado, **materias primas**), y

Punto 4, viñeta 3: - pormenores del contenedor y del embarque, incluido el puerto de origen, **paradas** y el destino, e

Punto 5, viñeta 4: - medidas para disminuir **o controlar** el riesgo mediante el tratamiento físico adecuado;

Se apoya en mantener el Anexo original: **MODELO UNIFORME PARA EL INTERCAMBIO DE INFORMACIÓN EN SITUACIONES DE EMERGENCIA DE INOCUIDAD ALIMENTARIA.**

KENYA**GENERAL COMMENT:**

Kenya appreciates the work done by the electronic working group chaired by the European Union and co-chaired by Chile to revise the Codex Standard CAC/GL 19-1995 and present it to the committee for comments.

Kenya proposes to combine both the annex and Alternative annex to read as follows: "STANDARD FORMAT FOR INFORMATION EXCHANGE IN FOOD SAFETY EMERGENCIAS" and alternative annex on "INFORMATION TO BE EXCHANGED IN FOOD SAFETY EMERGENCIAS".

Kenya propose to have the title of the annex as "information to be exchanged in food safety emergencies".

RATIONALE:

To align the required information with the INFOSAN requirements, as suggested in the alternative Annex.

MÉXICO

México agradece la oportunidad de realizar comentarios al documento **CX/FICS 16/22/5**, respecto al **REVISIÓN DE LOS PRINCIPIOS Y DIRECTRICES PARA EL INTERCAMBIO DE INFORMACIÓN EN SITUACIONES DE EMERGENCIA RELACIONADAS CON LA INOCUIDAD DE LOS ALIMENTOS (CAC/GL 19-1995)**, correspondiente al Tema 6 de la agenda de la próxima reunión del CCFICS.

COMENTARIOS ESPECÍFICOS**Apéndice I****Sección 2 – Ámbito de aplicación**

Parr.	Comentarios
4	...Debido a la globalización del comercio y el aumento de las operaciones de importación/exportación, es rare posible que la responsabilidad de gestionar una emergencia de inocuidad alimentaria recaiga en más de una sola autoridad competente nacional...
5	...También podrían aplicarse a las situaciones en las que no se ha identificado el peligro, pero existe información científica pertinente que sugiere establece una relación entre el consumo de un alimento y la aparición de graves efectos perjudiciales para la salud. <i>El término "sugiere" expresa subjetividad, México solicita cambiar por "establece".</i>

Sección 3 – Definiciones

Comentarios
Emergencia vinculada a la inocuidad de los alimentos: Una situación, ya sea accidental o intencional, en la que una autoridad competente identifica un riesgo peligro aún no controlado y/o el riesgo de

graves efectos perjudiciales para la salud pública vinculada al consumo de alimentos y que requiere medidas urgentes.

Respuesta a la emergencia vinculada a la inocuidad de los alimentos: Un proceso mediante el cual se evalúan los riesgos, se toman decisiones para la gestión de riesgos y se comunican dichos riesgos frente a limitaciones de tiempo y, posiblemente, datos y conocimientos incompletos.

Sección 4 – Principios

Parr.	Comentarios
9	<p>Los principios más importantes incluyen:</p> <p>d) Las medidas para la gestión de riesgos deberían ser proporcionales a los riesgos planteados por la situación de emergencia alimentaria y deberían examinarse, llevarse a cabo en un plazo razonable, examinarse y modificarse, según corresponda, cuando haya nueva información disponible.</p> <p>f) Si el país que detecta la emergencia no es el país exportador, deberá informar al país exportador de manera prioritaria. Todo país que detecte una emergencia de inocuidad alimentaria Se debería informar sin demora a todos los países que se sepa que estén afectados o podrían estarlo, utilizando mecanismos existentes y acuerdos internacionales (por ej. INFOSAN o RSI (2005), según corresponda). Si el país que detecta la emergencia no es el país exportador, se deberá informar al país exportador de manera prioritaria.</p> <p>i) El intercambio de información debería ser transparente y mantenerse durante todas las etapas de la emergencia alimentaria para permitir una evaluación constante y la elaboración implementación de una respuesta apropiada a la situación de emergencia.</p> <p><i>Se pretende resaltar que la respuesta puede evolucionar a medida de que se cuenta con mayor información sobre la situación de emergencia alimentaria y que esta debe ser congruente con el riesgo planteado.</i></p>

Sección 5 – Las partes interesadas y sus respectivas funciones

Parr.	Comentarios
11	<p>Luego de haber identificado una emergencia relativa a la inocuidad de los alimentos, la autoridad competente que la haya identificado debería comunicarse rápidamente con el punto o puntos oficiales de contacto del país (es decir, el Punto de contacto para emergencias de INFOSAN), y la autoridad o autoridades competentes pertinentes del otro país o países que estén afectados o puedan estarlo. Las autoridades competentes encargadas de coordinar la respuesta deberían mantener al tanto de las medidas tomadas, según corresponda, a los países que reciban los alimentos afectados. Debería verificarse la exactitud y veracidad de la información científica y de otro tipo referente a la emergencia alimentaria, para ayudar a adoptar las decisiones referentes a la evaluación, gestión y comunicación de los riesgos. Las autoridades competentes deberían corregir con prontitud toda información equivocada.</p>
12	<p>Por lo tanto, las autoridades competentes deberían proporcionar información clara, pertinente, concreta y oportuna sobre el estado de la emergencia alimentaria a su industria, consumidores y otras partes interesadas, utilizando así como a los medios de difusión que considere apropiados. También puede ser útil la elaboración de un plan de comunicación que incluya las redes sociales.</p> <p><i>México prefiere omitir la referencia al uso de las redes sociales y dejarlo como una opción de las autoridades competentes de acuerdo al texto sugerido.</i></p>
14	<p>...También tienen la responsabilidad de contar con sistemas de rastreo/rastreabilidad capaces de efectuar un rastreo y retiro eficaz de lotes de alimentos, y de proporcionar información oportuna...</p>

Sección 6 – Procedimientos para la respuesta a la emergencia de inocuidad alimentaria

Parr.	Comentarios
26	<p>Asimismo, las autoridades competentes deberían proporcionar información clara, pertinente, concreta, actualizada y oportuna sobre el estado de la emergencia alimentaria a todas las partes interesadas, utilizando así como a los medios de difusión que considere pertinentes. También puede ser útil la elaboración de un plan de comunicación que incluya las redes sociales.</p>
28	<p>Es posible que el flujo de información en las etapas iniciales del procedimiento incluya suposiciones estimaciones y cierto nivel de precaución incertidumbre con respecto a</p>

<p>las medidas implementadas. Dicha información debería actualizarse a medida que se tengan más detalles...</p> <p><i>Referir sólo flujo de información con respecto a la naturaleza de la emergencia y no respecto a las medidas implantadas, el principio "d" y el "i" refieren la consideración de las medidas implantadas en correspondencia con la información disponible.</i></p>

Anexo

1. Naturaleza de la emergencia de inocuidad alimentaria

Viñeta 7: agente desconocido **no identificado** (especificar los graves efectos perjudiciales para la salud vinculados al consumo de determinados alimentos).

2. Identificación de los alimentos o, de corresponder, los piensos afectados

Los alimentos o piensos afectados deberían describirse detalladamente. **De estar disponible, Sse** debería proporcionar la información siguiente, ~~de estar disponible~~ y según corresponda al producto:

Viñeta 3: identificación del lote, incluido el código, **y** las fechas de producción **o** y elaboración ~~y la identificación del último establecimiento donde se elaboró o envasó;~~
La parte eliminada está considerada en la viñeta 5.

Viñeta 7: número o números de referencia del certificado o certificados de exportación; **y nombre de la autoridad o entidad que los emite** ~~nombre y marca oficial.~~
No es claro a qué se refiere el texto "nombre y marca oficial", solicitamos aclaración. ¿Se refiere al nombre y sello de la autoridad que emite?

Anexo alternativo

Otra información detallada, de estar disponible, debería incluir:

Viñeta 2: toda información proveniente de laboratorios (clínica o vinculada al alimento, ~~incluido el PFGE si es relevante y está disponible~~)

COMENTARIOS DE TRADUCCIÓN (Sólo aplican a la versión en español del documento CX/FICS 16/22/5)

Apéndice 1

Sección 4 – Principios

Parr.	Comentarios
8	...En una respuesta a la emergencia de inocuidad alimentaria se deberían aplicar los principios de análisis de riesgos reconocidos por la Comisión del Codex Alimentarius ¹⁰ , reconociendo además que, debido a limitaciones de tiempo, se podrán tomar medidas de gestión en con base en la información limitada y antes de finalizar una evaluación completa de los riesgos.
9	Los principios más importantes incluyen: j) No debería distribuirse en el comercio internacional ningún alimento con el objetivo de eliminar alimentos que no fueran inocuos o idóneos, de acuerdo con lo descrito en 3.2 del Código de ética para el comercio internacional de alimentos incluyendo transacciones en condiciones de favor y ayuda alimentaria (CAC/RCP 20-1979).

Sección 5 – Las partes interesadas y sus respectivas funciones

Parr.	Comentarios
16	Los consumidores pueden mejorar su salud personal y la salud publica pública en general manteniéndose informados y acatando las instrucciones relacionadas con la inocuidad de los alimentos, y desempeñan...

Mexico appreciates the opportunity to make comments to the document **CX/FICS 16/22/5**, regarding the **REVISION OF THE PRINCIPLES AND GUIDELINES FOR THE EXCHANGE OF INFORMATION IN FOOD SAFETY EMERGENCY SITUATIONS (CAC/GL 19-1995)**, corresponding to agenda item 6 of the next CCFICS session.

SPECIFIC COMMENTS

Appendix I

Section 2 – Scope

Para.	Comments
4	...Due to trade globalization and increased import/export operations, it is possible that the management of a food safety emergency is rarely the responsibility of <u>more than one</u> a single national competent authority...
5	...They may also apply to situations where the food safety hazard has not been identified, but relevant scientific information suggests establishes a link between consumption of a food and the appearance of serious health effects. <i>The term "suggest" expresses subjectivity, Mexico requests changed to "establish".</i>

Section 3 – Definitions

Comments
Food Safety Emergency: A situation, whether accidental or intentional, that is identified by a competent authority as constituting a serious and as yet uncontrolled <u>hazard and/or as constituting a serious</u> foodborne risk to public health that requires urgent action.
Food Safety Emergency Response: A process of assessing the risk, making risk management decisions, and communicating risks in the face of time constraints, and possible incomplete data and knowledge.

Section 4 – Principles

Para.	Comments
9	Key principles include: d) Risk management measures should be reviewed <u>proportionate to the risks set out by the food emergency</u> , performed within a reasonable time, <u>reviewed</u> and modified as appropriate when new information comes available. f) <u>If the country detecting the emergency is not the exporting country, the exporting country must be informed as a matter of priority.</u> A country detecting a food safety emergency should inform <u>All</u> known affected and potentially affected countries <u>should be informed</u> without delay utilizing existing mechanisms and international agreements (e.g. INFOSAN or IHR (2005), as appropriate). If the country detecting the emergency is not the exporting country, the exporting country must be informed as a matter of priority. i) Information flow should be transparent and continue during all phases of the food safety emergency to enable continuous evaluation and development <u>implementation</u> of the emergency <u>appropriate</u> response <u>to the emergency</u> . <i>In order to emphasize that the answer may evolve according to the information available on the food emergency and it should be consistent with the risk involved.</i>

Section 5 – Stakeholders and their respective roles

Para.	Comments
11	Upon identification of a food safety emergency, the competent authority identifying the emergency should promptly communicate with official contact point(s) (i.e. the INFOSAN Emergency Contact Point) of the country and the appropriate competent authority/ies of other affected or potentially affected country/ies. The competent authorities responsible for coordinating the response should update countries receiving the affected food of action taken, as appropriate. The accuracy and veracity of the scientific and other information regarding a food safety emergency should be verified to assist in carrying out of risk assessment, risk management and risk communication. Any misinformation should be promptly corrected by competent authorities.
12	Competent authorities should provide clear, relevant, factual and timely information <u>on the status of the food safety emergency</u> to their industry, consumers, <u>and</u> other stakeholders, <u>using</u> and the media <u>as it considers appropriate</u> on the status of the food safety emergency. The development of a communications plan that includes the use of social media may also be useful.

	<i>Mexico prefers to omit the reference to the use of social networks and leave it as an option to the competent authorities according to the suggested text.</i>
14	...They are also responsible for having in place traceability systems capable of effective tracing and recall of food lots and for providing timely and relevant information...

Section 6 – Processes for food safety emergency response

Para.	Comments
26	Competent authorities should also provide clear, relevant, updated, factual and timely communication on the status of the food safety emergency to all relevant stakeholders and, using the media as it considers appropriate on the status of the food safety emergency. The development of a communication plan that includes the use of social media may also be useful.
28	The information flow at the initial stages of the process will likely include presumptions estimations and a level of precaution uncertainty with regards to the measures implemented . This information should be refined as further detail... <i>Refer only flow information regarding the nature of the emergency and not with respect to the implemented measures, principles "d" and "i" refers the consideration of the implemented measures in correspondence with the available information.</i>

Annex

1. Nature of the food safety emergency

Bullet 7: **unidentified** ~~unknown~~ agent (specify serious adverse health effects associated with consumption of specified foods).

2. Identification of foods or, as appropriate, feeds concerned

The foods or feeds concerned should be described completely. **If available,** ~~the~~ the following information should be provided ~~if available~~, as appropriate to the product:

Bullet 3: lot identification, including lot code, **and** dates of production ~~and/or~~ processing, ~~and identification of premises where last packed or processed;~~
The deleted text is considered in bullet 5.

Bullet 7: export certificate(s) reference number(s), **and name of the authority or entity issuing** ~~official name and mark.~~

It is not clear what the text "official name and mark" means, we request for clarification. Does it refer to the name and stamp of the issuing authority?

Alternative Annex

Further detailed information, if available, should include:

Bullet 2: any laboratory information (clinical or food related, ~~including PFGE file if relevant and available~~);

TRANSLATION COMMENTS (Only applicable to the Spanish version of the document CX/FICS 16/22/5)

Appendix I

Section 4 – Principles

Para.	Comments
8	...En una respuesta a la emergencia de inocuidad alimentaria se deberían aplicar los principios de análisis de riesgos reconocidos por la Comisión del Codex Alimentarius ¹⁰ , reconociendo además que, debido a limitaciones de tiempo, se podrán tomar medidas de gestión en con base en la información limitada y antes de finalizar una evaluación completa de los riesgos.
9	Los principios más importantes incluyen: j) No debería distribuirse en el comercio internacional ningún alimento con el objetivo de eliminar alimentos que no fueran inocuos o idóneos, de acuerdo con los descrito en 3.2 del Código de ética para el comercio internacional de alimentos incluyendo transacciones en condiciones de favor y ayuda alimentaria (CAC/RCP 20-1979).

Section 5 – Stakeholders and their respective roles

Para.	Comments
16	Los consumidores pueden mejorar su salud personal y la salud pública publica pública en general manteniéndose informados y acatando las instrucciones relacionadas con la inocuidad de los alimentos, y desempeñan...

NEW ZEALAND

General Comments

New Zealand continues to support this work and appreciates the work of the EU in leading the electronic working group. The draft document presented in Appendix 1 largely fulfils the project document. The Committee has not previously been able to give time to a para by para review of the text and if this can be completed at this session the text should be able to progress to at least step 5 (and possibly step 5/8) at this session.

New Zealand does have some suggested amendments to the text. In particularly we suggest that Section 4 – Principles needs re-working. There are now ten principles proposed, however significant duplication has been introduced and New Zealand suggests that by re-working the text what is actually five principles can be clearly stated.

Our other suggestions relate largely to the issues identified in paragraph 6 of the main agenda paper to provide significant advice on the management of food safety emergencies. The FAO/WHO guidance referred to does this adequately and Codex should not be duplicating or para-phrasing those documents. This document should remain focused on the exchange of information but in doing so it is not necessary or appropriate for Codex guidance to repeat the instructions or guidance associated with INFOSAN.

New Zealand does not therefore believe that the title of the document needs to change.

In respect of the Annex of information to be exchanged. The Committee may wish to consider if an annex is necessary at all given the existence of INFOSAN. If an annex is retained then it should not repeat what is required by INFOSAN, rather a brief summary or the identification of additional areas of information could be considered.

Specific Comments

Section 4 – Principles.

New Zealand Comment: This section needs reworking to remove duplication and improve clarity and readability. Some of the principles as currently worded are an explanation or advice rather than a principle. Also as the focus of the document is the exchange of information it is not necessary to include risk management advice. A new sentence to be added at the end of para 8 is suggested to improve readability and support the removal of duplication from the principles. Para 8 would read as follows:

8. Many food safety emergencies have international implications and may be reportable to the WHO under the International Health Regulations (2005)⁹ (IHR) and INFOSAN. A Food Safety Emergency Response should follow the risk analysis principles recognized by the Codex Alimentarius,¹⁰ while recognizing that due to time constraints risk management measures may have to be taken on the basis of limited information and before the completion of a full risk assessment. **The timely sharing of clear, relevant and factual information will all affected and potentially affected countries to take informed risk assessment, risk management and/or risk communication decisions.**

9. Key The following principles apply include:

- a) ~~A primary official contact point should be designated by each country involved in a food safety emergency to facilitate and manage a response. Preparedness and response to food safety emergencies may require coordination between competent authorities responsible for different parts of the food chain and public health, depending on the emergency. [Rational: The first sentence is covered by principle e); the second sentence is advice not a principle.]~~
- b) **All relevant** Information on the nature and extent of the food safety emergency, including a risk assessment when completed, should, ~~where possible,~~ be clearly and completely described by the relevant competent authorities. If the basis for the food safety emergency is related to the use of feed, the specific nature of the feed related problem and its impact on food safety should be indicated. *[Rational: the addition of 'All relevant' at the beginning is from g) and is for completeness and facilitates the removal of duplication from the principles. The words 'where possible' are not necessary and should be deleted]*
- c) ~~In circumstances where the specific food safety hazard has not been precisely identified, any clear and substantial association between the consumption of a food and the appearance of serious public health effects should be provided by the competent authority. [Rational: this principle is covered by b) as it relates to 'the nature and extent of the food safety emergency'].~~
- d) ~~Risk management measures should be reviewed, performed within a reasonable time and modified as appropriate when new information comes available. [Rational: this principle is not necessary as the focus of the guidance is information exchange not risk management. The need to revise or update information over time is dealt with by i).]~~
- e) The exchange of information on food safety emergencies should be between official contact points designated by the competent authorities ~~in accordance with section 6.2.~~ A channel providing the most rapid and effective information flow should be used. *[Rational: a cross reference is not necessary in a principle]*
- f) A country detecting a food safety emergency should inform all known affected and potentially affected countries without delay utilizing existing mechanisms and international agreements (e.g. INFOSAN or IHR (2005), as appropriate). ~~If the country detecting the emergency is not the exporting country, the exporting country must be informed as a matter of priority. [Rational: the second sentence is not necessary as it repeats the concept expressed in the first sentence]~~
- g) ~~All relevant information should be shared by competent authorities detecting a food safety emergency to enable all affected and potentially affected countries to take informed risk assessment, risk management and/or risk communication decisions. [Rational: this is covered by b), e) and f and why information needs to be shared 'to enable informed actions' is covered by the amendment to para 8 - the introduction to the principles].~~
- h) ~~Competent authorities should also provide clear, relevant, factual and timely information to relevant stakeholders. [Rational: this is implicitly covered by principles b) and f). It is also explicitly stated in para 12.]~~
- i) Information flow should be transparent and continue during all phases of the food safety emergency to enable continuous evaluation and development of the emergency response.
- j) ~~Food should not be placed in international trade for the purpose of disposing of unsafe or unsuitable food as described in 3.2 of the Code of Ethics for International Trade in Food including Concessional and Food Aid Transactions (CAC/RCP 20-1979). [Rational: this is not a principle.]~~

Section 5.1 Competent authorities. Para 11 should be deleted as it is repeating what is in the principles.

Section 5.3

14. Food business operators have the primary responsibility for ensuring food safety and are thus responsible for contributing to ~~manage~~ **the management of** food safety emergencies related to their products. They are also responsible for having in place traceability systems

capable of effective tracing of food lots and for providing timely and relevant information to the competent authorities and other relevant stakeholders, including customers and/or consumers, on matters of relevance for managing food safety emergencies. They are ~~also~~ responsible for providing training or instruction to staff and for internal **company** communication. These provisions also apply to feed business operators if the food safety emergency is associated with feed. *[Rational: changes made for readability and correction of language].*

15. In relation to food receipt, a food business operator ~~must~~ **should** be able to provide information about what food it has on the premises and where it came from. *[Rational: 'must' will be dependent on each countries legislation].*

Section 5.4

16. Consumers can ... The information should ~~concern~~ **include** health effects on the most sensitive groups (children, elderly people and people with reduced immune system) and how the affected food/foods can be identified and handled in order to reduce further spreading of risk (e.g. information to travellers about food in luggage). *[Rational: correction].*

Section 6. This section deals with the actual food safety emergency response. If the focus of this document is the exchange of information and not the management of the emergency then the committee needs to consider if all the subsections are necessary.

Section 6.1 Food Safety Emergency Plan para 18. As this relates to a national food safety emergency plan is it necessary to be in this document?

Section 6.2

19. Each country should designate a primary official contact point for food safety emergency situations, which can act as the national focal point for information exchange in such situations. Although the primary official contact point is the first contact, it is understood that, in a given food safety emergency, national Governments may wish to designate a specific contact point for that emergency. ~~Updated information on the primary official contact points should be provided to INFOSAN. Any change in the contact point should be swiftly communicated to INFOSAN. Necessary information includes the name of the competent authority and the contact details, including name, address, phone numbers, facsimile numbers and email addresses, of the persons or offices responsible for managing the specific food safety emergency and who can provide further details about the hazard, the foods or, as appropriate, the feed concerned, actions taken and other relevant information. A website address should also be provided if such a resource is used to provide up-to-date information.~~ *[Rational: much of this para appears to contain information that would be in the INFOSAN documentation it should not therefore be repeated in Codex guidance. The last sentence should be moved to para 23.]*

Section 6.3 Level of food distribution. Is this section necessary – it deals with risk management and risk communication aspects and references the FAO/WHO guidance which is a more appropriate document to address these aspects.

Section 6.4

23. Communication should be made by the most expedient means, as early as possible, and with verification of receipt by primary official contact points. Communications by telephone (of particular importance outside office hours at the receiving end) or electronic means should be considered to achieve early communication and to ensure that the message is received by the competent authorities as quickly as possible. **A website address should also be provided if such a resource is used to provide up-to-date information.** *[Rational: new last sentence has been moved from para 19 – it is more logically placed in this para]*

Para 26 should be deleted as it repeats para 12.

Section 6.5 para 27 could be deleted if the annex is deleted.

PHILIPPINES

General Comments:

We would like to submit our comments on the list of issues put forward for consideration of the Committee as shown in paragraph 6 of the document.

- On Bullet a and b, we are of the view that the document should focus basically on the exchange of information. Any reference to the actual management of food safety emergency should be delegated to the national competent authority(ies). Furthermore, the FAO guideline document is a good resource material that can be referred to by National governments. With this, we are of the position that the title of the document should remain.
 - On Bullet c, we are of the view that the original Annex provides more information needed by national government to deal with a food safety emergency situation. Information such as affected or potentially affected population is important and vital in developing strategies to address the issue.
-

URUGUAY

(i) OBSERVACIONES GENERALES

Uruguay agradece al grupo de trabajo presidido por la Unión Europea y copresidido por Chile la preparación y elaboración de la Revisión de los principios y directrices para el intercambio de información en situaciones d emergencias relacionadas con la inocuidad de los alimentos. Asimismo, damos las gracias por la oportunidad que se nos brinda para presentar las siguientes observaciones.

Si bien el ámbito de aplicación sería para los principios y directrices para el intercambio de información destinada a responder a las emergencias de inocuidad alimentaria, en el documento también se plantea la gestión de dicha información. Esto excedería al espíritu del documento que está expresado en el título.

En relación a la opción de Anexos sobre la información a intercambiarse, Uruguay considera que la versión original es la más adecuada, ya que permite obtener una información más detallada que contribuye a la transparencia y pronta resolución en situaciones de emergencia.
