



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION
AND CERTIFICATION SYSTEMS**

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**DRAFT GUIDANCE FOR MONITORING
THE PERFORMANCE OF NATIONAL FOOD CONTROL SYSTEMS**

**(Comments at Step 3 from Brazil, Chile, Ecuador, El Salvador, Ghana, Indonesia, Japan, Kenya,
Mexico, Thailand and NFS International)**

BRAZIL

Brazil would like to thank the United States of America for the work done and for the opportunity to present comments on the document.

Specific comments:

SECTION 1 INTRODUCTION

- **Paragraph 1** – In the first sentence of the paragraph remove the word “effective” before “national food control system(s)”. So the sentence would read “An ~~effective~~ national food control system(s) (NFCS) is essential for ensuring the safety and suitability of food for consumers”.

Rationale: The purpose of the guidance is to verify/assess the performance of national food control systems, regardless of its effectiveness. Thus, the deletion of the word “effective”, matching the sentence as it is in the Spanish version, does not affect the overall objective of the guidance.

- **Paragraph 1** – In the Spanish version, put the “Sistema nacional” in the plural.

Rationale: In order to harmonize the Spanish and English versions of the document, add “(s)” to the word “sistema” and “(es)” to the word “nacional”. So the sentence in Spanish would read: “Un sistema(s) nacional(es) de control de los alimentos (SNCA) resulta esencial para asegurar la inocuidad alimentaria y alimentos aptos para los consumidores”.

CHILE

General comment

The draft standard provides useful guidance for governments to build indicators for their self-evaluations. The text overcomes initial concerns about establishing indicators that would be used for other purposes beyond improving food control systems.

Specific comments

SECTION 3 DEFINITIONS

Paragraph about the definitions of “outcome” (“*resultados*”) and “output” (“*producción*”). The translation of “outcome” and “output” from English should be revised.

Rationale: The use of these words in Spanish does not reflect the definition used in the text in English.

SECTION 5.1 PLANNING STEPS

Paragraph 25, first bullet. The following should be added: "...setting the shortest possible deadlines for completion". The full text would read as follows: "• If there is insufficient human resource capacity, the competent authority should develop a plan to develop capacity where necessary, **setting the shortest possible deadlines for completion**".

Rationale: Adding this paragraph provides guidance for countries to set specific work deadlines.

Paragraph 25, second bullet. The following should be added after the period: "... to ensure their availability in the shortest possible time". The full text would read as follows: "• If there are insufficient financial resources available, the competent authority should seek out additional funding from national or international sources, **to ensure their availability in the shortest possible time**".

Rationale: Adding this paragraph provides guidance for countries to set specific work deadlines.

ECUADOR

GENERAL COMMENTS

According to the definitions of "review" and "monitoring", it can be seen that, in any assessment process, the process is first reviewed and then monitored. Therefore, it is suggested that "monitoring and system review" should be replaced by "system review and monitoring" in the entire document.

For example:

SECTION 1 - INTRODUCTION

Paragraph 3. The ~~monitoring and system review~~ **system review and monitoring** function of the NFCS calls on the competent authority to regularly assess the effectiveness of the NFCS in achieving its objectives of protecting the health of consumers and ensuring fair practices in the food trade. The evidence generated through ~~monitoring and system review~~ **system review and monitoring** informs the policy setting, system design, and implementation functions of the NFCS.

SPECIFIC COMMENTS

SECTION 1 - INTRODUCTION

Paragraph 6. Other assessment tools can be used in conjunction with performance monitoring to provide a comprehensive view of the NFCS (see Appendix B). [*Translator's note: The amendment proposed does not affect the meaning of the English version.*]

SECTION 3 - DEFINITIONS

Include the definition of:

- REVIEW: Attentive and careful observation in order to know its characteristics, qualities or state.
- PERFORMANCE: The output or usefulness provided by a process.

SECTION 4 - PRINCIPLES OF THE PERFORMANCE MONITORING FRAMEWORK

Paragraph 10. In a comprehensive approach, a competent authority would monitor ~~its~~ performance across all components of the NFCS. However, depending on the priorities and capabilities of the competent authority, it may be more practical and affordable to apply the performance monitoring framework in a phased or targeted approach.

Paragraph 12. It is customized to the ~~unique~~ needs and **which are specific to the** structure of the NFCS and uses information collected from within and outside the system to identify gaps, optimize operations, and promote continuous improvement- **of the system.**

Paragraph 13. It is open to consultation and review by national stakeholders during multiple stages of the process, while respecting legal requirements to protect confidential information as appropriate. [*Translator's note: The amendment proposed does not affect the meaning of the English version.*]

Paragraph 14. It builds on existing data collection and program management ~~and~~. **It utilizes** appropriate external data sources to assess the performance of ~~the~~ **its** NFCS.

Paragraph 15. It is adaptive to changes to the NFCS and the environment in which it operates and accommodates revisions to both the outcomes sought, associated activities, and **to** the indicators applied.

SECTION 5 - PERFORMANCE MONITORING FRAMEWORK FOR AN NFCS

Paragraph 17. The performance monitoring framework presents a cyclical process that includes three broad tasks: ~~planning, monitoring, and system review~~ **planning, system review and monitoring**. Performance monitoring is an ongoing process, where each step feeds into the next step in the cycle and will be revisited over time.

- Through the monitoring steps, the competent authority collects data and generates the information necessary to assess progress **of the NFCS**.
- Through the system review steps, the competent authority uses information generated through the monitoring steps to assess the effectiveness of the NFCS and facilitate continuous improvement **of the system** as necessary.

SECTION 5.1 PLANNING STEPS

Step 1.

Paragraph 24. If the competent authority lacks sufficient capacity or resources to monitor performance of the entire NFCS, the competent authority may implement monitoring and system review in a phased or targeted approach, beginning with a limited number of priority components. The competent authority may use CAC/GL 82-2013 in conjunction with national goals to identify priority components for a phased or targeted approach. [*Translator's note: The amendments proposed do not affect the meaning of the English version.*]

Step 2.

Paragraph 28. In addition to capturing what is to be achieved, outcomes should follow SMART criteria.

Specific: What exactly is going to be achieved?

Measurable: Can the outcome be measured through qualitative or quantitative indicators?

Attainable: Is the outcome in line with the competent authority's competencies ~~and authorities~~?

Relevant: Will achieving an outcome contribute to achieving the NFCS Objectives?

Time-bound: Can a timescale be defined for achieving the outcome?

Paragraph 31. After defining the starting point, the competent authority should ask "How will this be achieved?" to identify the next level of outcomes that contribute to achieving the highest-level outcome. There may be several intermediate or lower-level outcomes that contribute to achieving the highest-level outcome. The competent authority can ensure that all of the relevant outcomes have been identified by asking "What else is necessary?" to achieve the highest -level outcome.

Paragraph 34. When read from the top down, an outcome framework explains how each outcome will be achieved –by first achieving the outcomes at the next lowest level. When read from the bottom up, it explains why each outcome is important –because it contributes to achieving an outcome at the next highest level. [*Translator's note: The amendment proposed does not affect the meaning of the English version.*]

Step 3.

Paragraph 40. As part of a phased or targeted approach, the competent authority may establish indicators for which there are existing processes for data collection and analysis or addressing priority components of the NFCS. [*Translator's note: The amendment proposed does not affect the meaning of the English version.*]

Paragraph 45. Among the many potential indicators that meet these criteria, the competent authority **must** consider the following information to choose the most direct indicators ~~for which it is technically and financially capable of collecting and analysing data.~~ **and be technically and financially capable of collecting and analysing data.**

Paragraph 46. Measurement influences behaviour, so it is important to choose indicators that will incentivize the actions that will lead to achieving the intended outcomes. [*Translator's note: The amendment proposed*

does not affect the meaning of the English version.]

Step 4.

Paragraph 47. To ensure that indicators are successfully integrated into the monitoring and system review function of a competent authority, a performance monitoring plan (PMP) should be created to provide detailed information on how performance data will be collected and analysed. For each indicator, the PMP should include:

- Explanation or definition of indicator
- Source of data
- **Methods for data collection**
- **Methods for data analysis**
- **Frequency of data collection**
- Roles and responsibilities for data collection
- Roles and responsibilities for data analysis
- Roles and responsibilities for ensuring data quality
- Baseline values
- Target values

Paragraph 48. The competent authority should collect baseline data for each indicator. Baselines establish the current situation and are used as a starting point against which future performance will be measured. Collecting baseline data can serve as a pilot to identify indicators that may not work. **which will make it easier to exclude them when improving the system.**

SECTION 5.2 MONITORING & SYSTEM REVIEW STEPS

Paragraph 55. Monitoring and system review is only useful if the findings are used to inform and influence operations. Simply reporting the data is not enough. The competent authority should institute approaches that will ensure the full integration of performance data. Some examples include:

- Conducting formal, regularly scheduled performance review meetings to assess continued appropriateness of activities and relevance of selected outcomes
- Integrating performance data into resource prioritization and budgeting decisions
- Identifying and sharing best practices and lessons **previously** learned
- Identifying gaps or problems that could be addressed with capacity building
- Assessing other opportunities within the CA to use performance data

EL SALVADOR

El Salvador welcomes the document prepared by the electronic Working Group chaired by the United States.

General remarks:

The draft text is supported and can be advanced through the Codex Step Procedure.

The draft text presented to us seems very comprehensive and of great importance for countries that are in the process of the establishment of a National Food Control System, as in the case of El Salvador.

GHANA

General Comments

Ghana commends the United States and the members of the eWG for the extensive work on the proposed draft guidance for monitoring the performance of national Food Control Systems (NFCS).

The document addresses key issues raised at the last session of CCFICS and also takes into account performance indicators used in evaluating a NFCS. The document also provides sufficient guidance and information on the planning, monitoring and system review components, which are essential for ensuring the effectiveness of a NFCS. We believe the proposed draft guidance provides a strong basis for countries to

undertake systematic self-evaluation of their NFCS. Ghana therefore wishes to recommend that the 22nd Session of CCFICS advances the document in the Codex Step Process.

INDONESIA

General Comments

Indonesia thanks the United States of America as chair of EWG and members of EWG for preparing and contributing to the Proposed Draft Guidance for Monitoring the Performance of National Food Control Systems (NFCS). Indonesia supports this draft and considers that it will be useful as a guidance for monitoring the performance NFCS.

Indonesia is in process of consolidating its NFCS to be in line among others with the Principles and Guidelines for National Food Control Systems (CAC/GL 82-2013). Considering the development of proposed draft for monitoring NFCS, Indonesia would like to suggest that the proposed draft incorporate detailed indicators and method of measuring the indicators, since these indicators will be useful for countries to monitor the ongoing consolidation process of their NFCS.

JAPAN

Section 3 Definition

Activity: Actions taken or work performed through which inputs (~~such as funds, staff, and other types of resources~~) are mobilized to produce specific outputs

Rationale: The definition of the term "inputs" is on the page 6, so the examples in this definition is not needed,

Para 16

16. Countries ~~must~~ **should** have established an NFCS or components of an NFCS prior to using this framework

Rationale: this is a guideline document, so instead of "must", "should" be used.

Step 1: Conduct **Readiness** Assessment

Rationale: to be consistent with the Figure 1 and the contents of para 20

Para 23 should be transferred to between para 53 and 54 as para 53 bis

Rationale: The current para 23 deals with the resources needed for Monitoring and system review, therefore better fit under Section 5.2

Para 44, 3rd bullet point

We prefer "subject to".

Para 47,

Add a new bullet point

"**• Methods for ensuring data quality**", and insert it between 4th and 5th bullet point

Rationale: Not only "method for data collection and analysis", but also "Methods for ensuring data quality" is specified in Para.22.

Para 47,

Second bullet from the bottom

• ~~baseline values data~~

Rationale: to be consistent with the para49

Para 49

49. After baseline data has been collected and as appropriate, the competent authority should establish targets values for indicators. A target value is a specified result that is to be realized within a specific timeframe. For some indicators, the target value might simply be to "increase", "maintain", or "decrease" from the baseline value, **or xx% increase, or YY % decrease.**

Rationale: target value, to be consist with the last bullet point of the para 47

Additional phrase: it may include a quantitative target, e.g. xx% decrease.

Section 5.2 Monitoring and System Review Steps

To be consist with Figure 1, this section should be subdivided into “Step5 Collect and Analyze Data” and “Step 6 Report and Incorporate Findings”, similar to the Section 5.1.

Current para 53 and 53 bis (originally para 23) should be under “Step 5 Collect and Analyze Data” and para 54 to 56 should be under the “Step 6 Report and Incorporate Findings”,

Rationale: to make it reader-friendly

Para 55, the last bullet point

Assessing other opportunities within the CA **competent authority** to use performance data

Rationale: editorial

Para 56, 3rd bullet point

The PMP should be updated on a regular basis to reflect **the following changes, including but not limited to**, institutional changes, technological advancements, or evolving methods for data analysis.

Rationale: to add flexibility

Page 13

Indicators of the Outcome B

Add a new bullet point

Percent of food producers that implement and monitor SSOP and/or HACCP system

Rationale: as a good example

Indicators of the Outcome C

Add a new bullet point

Percent of samples that comply with regulatory microbiological criteria

Rationale: as a good example

Indicators of the Outcome D

Add a new bullet point

Percent of food producers who participate in food safety training provided by the competent authority or relevant organizations

Rationale: as a good example

KENYA

Kenya appreciates the good work done by the EWG Led by United States of America in coming up with this draft standard for the committee members to comment on. The draft has very important information and educative to consumers.

SPECIFIC COMMENT

We propose that the illustration figures from section 5.1 and 5.2 be retained either in the document or posted on the CAC website for reference and a checklist be in cooperated in the standard to ease the implementation process.

Appendix I

DRAFT PROPOSED GUIDANCE FOR MONITORING THE PERFORMANCE OF NATIONAL FOOD CONTROL SYSTEMS

SECTION 2 PURPOSE OF GUIDANCE

9. A competent authority¹⁰ can use this framework to implement monitoring and system review, or incorporate this approach to make existing processes more robust.

SPECIFIC COMMENT:

We propose a footnote number (10) to describe a “Competent Authority” to be presented and Reference to CAC/GL 82-2013.

Rationale: for the purpose of clarity throughout the document where it has been used.

SECTION 5.1 PLANNING STEPS

Step 1: Conduct Assessment

21. Organizational commitment is essential for ensuring that monitoring and system review are prioritized and funded as an integral component of the NFCS. The following questions can help the competent authority to assess the level of organizational commitment to monitoring and system review:

- What are the legislative or policy objectives of the NFCS and how does the competent authority support those objectives?
- How does the competent authority intend to support performance monitoring at various levels of the NFCS?
- How does the competent authority intend to use performance monitoring data (e.g., to assess the effectiveness of the NFCS and take preventive or corrective action or improve the system as appropriate?)?

SPECIFIC COMMENT:

Reference is made on paragraph 21. Bullet 3, two question marks are used at the end of the sentence for certain reason not known. We propose deletion of one as indicated or clarification to be made as it is just an example made for clarity.

Step 3: Establish Indicators

44. Indicators may be qualitative or quantitative and should fulfil the following criteria:

- Clear: Indicators are unambiguous, easy to interpret and transparent.
- Relevant: Indicators are closely linked to the outcomes and meaningful from an organisational perspective.
- Verifiable: Indicators are ~~[capable of, subject to]~~ amenable to independent validation.

SPECIFIC COMMENT

Reference is made to paragraph 44, bullet 2 above, where we propose deletion of the opening and close square bracketed "[capable of, subject to]" for we accept the sentence as is
Rationale: for clarity

SECTION 5.2 MONITORING & SYSTEM REVIEW STEPS

55. Monitoring and system review is only useful if the findings are used to inform and influence operations. Simply reporting the data is not enough. The competent authority should institute approaches that will ensure the full integration of performance data. Some examples include:

- Conducting formal, regularly scheduled performance review meetings to assess continued appropriateness of activities and relevance of selected outcomes
- Integrating performance data into resource prioritization and budgeting decisions
- Identifying and sharing best practices and lessons learned
- Identifying gaps or problems that could be addressed with capacity building
- Assessing other opportunities within the **CA competent authority** to use performance data

SPECIFIC COMMENT:

Reference is made to paragraph 55, bullet 5 mentioned above and we propose the expansion of the abbreviation 'CA' to be 'Competent Authority' since it's not used as CA throughout the draft standard.

Rationale: the initials CA previously on bullet 4 could mean different thing rather should be properly indicated as “Competent Authority”.

APPENDIX A: SIMPLIFIED OUTCOME FRAMEWORK WITH INDICATOR EXAMPLES

SPECIFIC COMMENT:

Kenya supports the incorporation of appendix A to be part of this standard for further guidance and information for the implementers of this standard once it's approved.

MEXICO

Mexico appreciates the opportunity to make comments to the document **CX/FICS 16/22/4**, regarding the **PROPOSED DRAFT GUIDANCE FOR MONITORING THE PERFORMANCE OF NATIONAL FOOD CONTROL SYSTEMS**, corresponding to agenda item 5 of the next CCFICS session.

SPECIFIC COMMENTS

Appendix I

Section 3 – Definitions

	Comments
Effectiveness:	The extent to which NFCS objectives or related outcomes were achieved, or are expected to be achieved , taking into account their relative importance.
Efficiency:	A measure of how economically resources/inputs (funds, expertise, time, etc.) are converted to results.

TRANSLATION COMMENTS (Only applicable to the Spanish version of the document CX/FICS 16/22/4)

Mexico considers appropriate to use the term “**desempeño**” replacing the term “rendimiento” in the title and throughout the document in the Spanish version.

Title: ANTEPROYECTO DE ORIENTACIONES PARA LA VERIFICACIÓN DEL **RENDIMIENTO DESEMPEÑO** DE LOS SISTEMAS NACIONALES DE CONTROL DE LOS ALIMENTOS

Appendix I

Section 1 – Introduction

Para.	Comments
4	...La orientación tiene como objetivo respaldar la autoevaluación del SNCA de un país y no el objetivo de utilizarse pretende que sea utilizada como base para comparar sistemas o imponer obstáculos al comercio.

Section 3 – Definitions

	Comments
Producción Salidas:	Los productos, bienes de capital y servicios resultantes de las actividades. Puede además incluir las modificaciones resultantes de las actividades pertinentes al logro de los resultados.

Section 5 – Performance monitoring framework for an NFCS

Para.	Comments
17	...La verificación del rendimiento es un proceso continuo en el que cada etapa del ciclo informa alimenta a la siguiente y será examinada con el paso del tiempo.

Section 5.1 – Planning steps

Para.	Comments
28	Además de determinar lo que se ha de lograr, los resultados deberían basarse en los criterios AMAPP. Bullet 2: Mensurable Medible: ¿Se pueden medir los resultados con indicadores cualitativos o cuantitativos?

	Bullet 3: Asequible Factible : ¿El resultado se ajusta a las competencias y poderes de la autoridad competente?
34	...Cuando se lee en sentido ascendente, se ve la explicación de la importancia de cada resultado, o sea, porque contribuye al logro del resultado del siguiente nivel más alto.
45	La autoridad competente debería considerar la siguiente información para seleccionar los indicadores más directos entre los indicadores potenciales que satisfacen estos criterios, y para los cuales tiene tener la capacidad técnica y económica para de recopilar y analizar los datos porque tiene la capacidad técnica y económica para hacerlo.
47	Se debería establecer un plan de verificación de rendimiento (PVR) que proporcione información detallada sobre la manera en la que se recopilarán y analizarán los datos...

Section 5.2 – Monitoring & system review steps

Para.	Comments
56	La autoridad competente debería reconsiderar los pasos de planificación a medida que se modifican las normativas, el diseño o la implementación del programa, en base a la utilización de los datos de rendimiento. Bullet 3: El PMP PVR debería actualizarse periódicamente...

THAILAND

Thailand would like to express our appreciations for efforts of an Electronic Working Group led by the United States of America for the preparation of Draft Proposed Guidance for Monitoring the Performance of National Food Control Systems at Step 3.

General comments

We agree with the document in principle.

Specific comment

However, we would like to propose our comments on specific sections of the document as follows.

Section 2: Purpose of Guidance

The title of this section should read “Scope and Objectives” in order to be consistent with its contexts.

Section 4: Principles of the Performance Monitoring Framework

1. For flexibility in practice, our proposals are as follows:

1) The principle of “Flexibility/Practicability and Affordability” should be remained as it was in the previous document. So, it should be inserted to the current document as an additional principle.

OR

2) An additional sentence should be inserted as the first sentence of paragraph 10 as follows:

“10 **An effective PMS operates within its current capacity to remain practical and affordable.** In a comprehensive approach, a competent authority would monitor its performance across all components of the NFCS. However, depending on the priorities and capabilities of the competent authority, it may be more practical and affordable to apply the performance monitoring framework in a phased or targeted approach.”

2. We would like to request for clarifications for the term

“targeted approach” that whether it means/covers “overall food sector of foods” , “specific products/sectors of foods”, “specific levels of outcome” , or etc..

And, for more understanding, the descriptions of term “targeted approach” should be elaborated.

3. Principle 3: Efficiency

The principle of effectiveness should be added to the title of this principle, because it is the first priority for consideration in the assessment of a National Food Control System (NFCS) in order to accomplish the outcome that contributes to achieving the NFCS Objectives. So, the title of this principle should read “**Principle 3: Effectiveness and efficiency**”.

Section: 5 Performance Monitoring Framework for a NFCS

Figure 1: Performance monitoring Framework

To avoid confusion, terms used in “Figure 1: Performance Monitoring Framework” should be consistent with contexts in “section 5.1: Planning Steps” and “5.2: Monitoring & System Review Steps”.

Section: 5.1 Planning Steps

Step 2: Define Outcomes to Monitor and Evaluate

Paragraph 28

From our point of view, “SMART criteria” is one of examples could be conducted to achieve the outcome that contributes to achieving the NFCS objectives. So, this paragraph should read as follows:

“28. In addition to capturing what is to be achieved, outcomes should follow, ***for example*** SMART criteria.”

Step 3: Establish Indicators

Paragraph 44, bullet 3

The term “capable of” should be used in this bullet, since it is more flexible. And, to be more flexible and not specific for only “independent validation”, the bullet should read as follows:

“• Verifiable: Indicators are ~~+~~ ***capable of***, ~~subject to~~ amenable to ***including*** independent validation.”

NFS INTERNATIONAL

Paragraph 23, first bullet – NSF International suggests that the phrase “through the use of internationally accredited third party providers and other means” be inserted after the end of the current sentence “How can existing resources be leveraged if necessary.” Paragraph 23, first bullet would thus read: “How can existing resources be leveraged if necessary, **through the use of internationally accredited third party providers and other means.**”

Paragraph 24 – NSF International also suggests that the following be added immediately after the last sentence of the current draft of Paragraph 24: “**Use of third party providers to increase capacity should be in accordance with Paragraph 75 of CAC/GL 82-2013.**”

RATIONALE: Many governments around the world lack sufficient resources to ensure food safety. As recognized in CAC/GL 82-2013, third party providers, if properly accredited and overseen, can play an important supplementary role to help increase the capacity and improve the performance of national food control systems.
