

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda items 4, 5, 6, 7, 8 & 9

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION
AND CERTIFICATION SYSTEMS
Twenty-third Session

Comments of Ghana, Mexico and The Consumer Goods Forum

Ghana

Agenda Item 4 - Draft Guidance for monitoring performance of national food control systems

Specific Comments

Ghana suggests that the title is changed to read "Draft Principles and Guidelines for monitoring and Performance of National Food Control Systems".

Rationale: The proposed change is consistent with CAC/GL 82-2013 and other Codex documents.

[3]Section 1 Point 2[5]

Ghana proposes the following insertion in the text to read;

The policy setting, **system design, implementation and monitoring and system review** of the NFCS should operate effectively over the course of time and have the capacity and capability to undergo continuous improvement. As scientific and technical advances occur, it is important that the NFCS demonstrates its ability to adapt

Rationale: this is to maintain consistency with the CAC/GL 82-2013

Editorial Comments

[12]Section 2 Point 7. [13]

This document ~~describes~~ **provides** a logistical framework

[19]Activity: **An Actions**

Agenda Item 5 - Discussion Paper on Food Integrity and Food Authenticity

General Consideration

Ghana appreciates the work done by Iran, Canada and the Netherlands in developing this discussion paper. Considering the effects food fraud has on consumer health and food trade, we support discussions on this issue and look forward to further work.

Agenda Item 6 - Discussion paper on the possible development of guidance on the use of systems equivalence

General Consideration

Ghana has no additional comments on this document at this point. We support the discussion paper.

Agenda Item 7 - Discussion paper on the use of electronic certificates by competent authorities and migration to paperless certificates

General Consideration

Ghana supports the document prepared by the Netherlands and Australia and looks forward to participation in further work on the document.

Agenda Item 8 - Discussion paper on regulatory approaches to third party certification in food safety

General Consideration

Ghana supports the advancements made on this paper.

Agenda Item 9 - Discussion paper on consideration of emerging issues and future directions for the work of the Codex Committee on Food Import and Export Inspection and Certification Systems

General Consideration

Ghana supports the discussion paper.

Mexico

Agenda Item 5 - DISCUSSION PAPER ON FOOD INTEGRITY AND FOOD AUTHENTICITY (CX/FICS 17/23/5)

Mexico would like to thank Iran, Canada and the Netherlands for this work. Mexico considers that this topic is addressed generally and broadly in different CCFICS documents and that it is a subject that has relevance at global level. In that sense, it is required a document that combines principles and / or guidelines to guarantee the integrity and authenticity of food. **Mexico supports the elaboration of a specific document to guide governments in the implementation of measures that guarantee the integrity and authenticity of food.**

Agenda item 6 - DISCUSSION PAPER ON THE USE OF SYSTEMS EQUIVALENCE CX/FICS 17/23/6)

Mexico would like to thank the work of New Zealand, the United States of America and Chile in the preparation of the document.

Mexico supports the development of guidelines regarding equivalence of systems. In this regard, Mexico believes that clarification is needed on the difference between the equivalence of a set of measures (as set out in the current guidelines (CAC / GL 53-2003) when applied to a product or group of products; and equivalence of the whole system or a part of the system (as suggested in the new work) applied to a product or group of products. The first seems to lead to the second.

The above mentioned, with the aim of taking advantage of the documents already available and expand their scope to allow the system equivalence approach (or part of it) from the determination of a series of measures or the measures that constitute the system.

Likewise, we consider that a tool is required to perform the comparability of measures (or NFCS elements) in a practical way.

Agenda item 7 - DISCUSSION PAPER ON THE USE OF ELECTRONIC CERTIFICATES BY COMPETENT AUHTORITIES AND MIGRATION TO PAPERLESS CERTIFICATION (CX/FICS 17/23/7)

Mexico would like to thank the Netherlands and Australia for the development of this document and **supports the revision of the Codex Guidelines for the Design, Production, Issuance and Use of Generic Official Certificates (CAC / GL 38-2001) in order to incorporate guidance on the use of electronic certificates** for competent authorities and the transition to paperless electronic certification; however, Mexico considers that, among other things, consideration should be given to:

- The different levels of development of the NFCS, the technological capabilities and other resources available to the member countries before adopting paperless certification.
- The compatibility of platforms for the exchange of digital information and IT security guarantees.
- Legislative adjustments and updating procedures.
- The need to use the generic model for an official certificate (Appendix CAC / GL 38-2001)

Agenda item 8 - DISCUSSION PAPER ON REGULATORY APPROACHES TO THIRD PARTY CERTIFICATION IN FOOD SAFETY (CX/FICS 17/23/8)

Mexico supports the development of guidance on regulatory approaches to certification by third parties. However, it considers important to establish principles that ensure, among other things:

- The voluntary nature of certification programs by third parties.
- The consideration of such programs by NFCS, but not their use as a requirement for food trade.
- The supervision by the competent authority of the regulatory elements included in the programs.
- Access to information related to compliance, particularly where there are risks to consumer health.

Consideration of the non-governmental nature of bodies such as ISO, IAF and GFSI, so that its textual quotation in a document of CODEX principles and guidelines would be restrictive. In that sense, it is instead preferred the quotation of just the essential characteristics of the programs.

The Consumer Goods Forum

General Comments

The objective of a national food control system (i.e. inspection and certification system) is to protect the health of humans and animals and ensure fair practices in the food trade. Food control systems should cover all food produced, processed and marketed within the country, including imported food. The national food control system should cover the entire food chain from primary production to consumption and inspections should be science-driven and with an appropriate frequency, based on risk assessment principles.

Food business operators (FBO) are responsible for the safety of the food and feed which they produce, transport, store or sell. FBO at all stages of production, processing and distribution, under their control, shall ensure that foods satisfy the requirements of food law and regulations, which are relevant to their activities and shall verify that such requirements are duly met.

Third party certification schemes are voluntary schemes. Certification is a process by which accredited certification bodies, based on an audit, provide written assurance that food safety controls and management systems and their implementation conformed to requirements.

Whilst regulators are not expected to abrogate their enforcement role, they should direct resources efficiently based on risk. Utilization of third party certification audits provide valuable information that can contribute to the determination of a risk-based approach for inspections. Third party accredited certification of a facility should be recognized as an important factor in helping regulatory authorities deploy their resources in an efficient and risk-based manner.

GFSI position

GFSI would like to thank Canada and the United Kingdom for preparing this discussion paper. We do support this discussion paper on – “regulatory approaches to third party certification in food safety” and support Codex to undertake this new work to help promote a consistent approach to the use of third party accredited certification schemes, in line with the Principles and Guidelines for National Food Control Systems (CAC/GL 82-2013).

Such an approach has the potential to enable the competent authorities and industry to improve food safety outcomes, while allowing each stakeholder to operate within its defined roles and responsibilities.

Commentaires généraux

L'objectif d'un système national de contrôle des aliments (c'est-à-dire le système d'inspection et de certification) est de protéger la santé des humains et des animaux et d'assurer des pratiques équitables dans le commerce alimentaire. Les systèmes de contrôle des aliments devraient couvrir tous les aliments produits, transformés et commercialisés dans le pays, y compris les aliments importés. Le système de contrôle des aliments devrait couvrir l'ensemble de la chaîne alimentaire de la production primaire à la consommation et les inspections devraient être axées sur la science et avec une fréquence appropriée, basée sur des principes d'évaluation des risques.

Les exploitants d'entreprises alimentaires [*Food business operators* (FBO)] sont responsables de la sécurité de l'alimentation et de la nourriture qu'ils produisent, transportent, stockent et vendent. Les FBO à tous les stades de la production, transformation et distribution, sous leur contrôle, doivent s'assurer que les aliments répondent aux exigences de la législation et de la réglementation alimentaire, qui sont pertinentes pour leurs activités et doivent vérifier que de telles exigences sont dûment respectées.

Les programmes de certification par un tiers sont des programmes volontaires. La certification est un processus par lequel les organismes de certification accrédités, basés sur un audit, fournissent une assurance écrite que les systèmes de contrôles et la gestion de sécurité alimentaire et leurs mise en oeuvre sont conformes aux exigences.

Bien que les régulateurs ne soient pas censés abroger leur rôle dans l'application de la loi, ils devraient orienter les ressources efficacement. L'utilisation d'audits de certification par un tiers fournit des informations précieuses qui peuvent contribuer à la détermination d'une approche basée sur le risque pour des inspections. La certification d'une installation par un tiers accrédité devrait être reconnue comme un important facteur pour aider les autorités de réglementation à déployer leurs ressources de manière efficace et basée sur le risque.

Position du GFSI

Le GFSI tient à remercier le Canada et le Royaume-Uni pour avoir préparé ce document de discussion. Nous donnons notre support à ce document de discussion sur - "les approches réglementaires de la certification par un tiers en sécurité alimentaire" et nous appuyons le Codex pour entreprendre ce nouveau travail afin de promouvoir une approche cohérente de l'utilisation de programmes de certification par un tiers accrédité, conformément aux Principes et Lignes Directrices pour les Systèmes Nationaux de Contrôle Alimentaire (CAC/GL 82-2013).

Une telle approche a le potentiel pour permettre aux autorités compétentes et à l'industrie d'améliorer les résultats de la sécurité alimentaire, tout en permettant à chaque intervenant d'exercer ses fonctions et responsabilités définies.

Comentarios generales

El objetivo de un sistema nacional de control de los alimentos (es decir, sistema de inspección y certificación) es proteger la salud de los seres humanos y animales y garantizar prácticas justas en el comercio de alimentos. Los sistemas de control de los alimentos deberían abarcar todos los alimentos producidos, elaborados y comercializados en el país, incluyendo los alimentos importados. El sistema nacional de control de los alimentos debería abarcar toda la cadena alimentaria, desde la producción primaria hasta el consumo, y las inspecciones deberían ser científicas y con una frecuencia adecuada, basándose en los principios de evaluación de riesgos.

Los operadores de empresas alimentarias son responsables de la seguridad de las comidas y alimentos que producen, transportan, almacenan o venden. Los operadores en todas las etapas de producción, procesamiento y distribución bajo su control deberán garantizar que los alimentos cumplan los requisitos y normas de la legislación alimentaria, que son pertinentes a sus actividades y deberán verificar que dichos requisitos sean cumplidos debidamente en todas las fases.

Los sistemas de certificación de terceros son regímenes voluntarios. La certificación es un proceso mediante el cual los organismos de certificación acreditados, basados en una auditoría, proporcionan una garantía por escrito de que los controles de seguridad alimentaria y los sistemas de gestión y su implementación cumplen con los requisitos.

Aunque no se espera que los reguladores deroguen su papel de ejecución, deben dirigir los recursos de forma eficaz basados en riesgos. La utilización de auditorías de certificación de terceros proporciona una información valiosa que puede contribuir a la determinación de un abordaje basado en riesgos para las inspecciones. La certificación acreditada por un tercero de una instalación debe ser reconocida como un factor importante para ayudar a las autoridades reguladoras a desplegar sus recursos de una manera eficiente y basada en riesgos.

Posición de GFSI

GFSI agradece a Canadá y a Reino Unido por la preparación de este documento de debate. Brindamos apoyo a este documento de debate sobre "abordajes regulatorios para la certificación de terceros en materia de seguridad alimentaria" y apoyamos al Codex a emprender este nuevo trabajo para promover un enfoque coherente del uso de sistemas de certificación acreditados por terceros, en conformidad con los Principios y Directrices para los Sistemas Nacionales de Control de los Alimentos (CAC / GL 82-2013).

Este abordaje tiene el potencial de permitir a las autoridades competentes y a la industria mejorar los resultados en materia de seguridad alimentaria, al tiempo que permite que cada parte interesada actúe dentro de sus funciones y responsabilidades definidas.