



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
FAO/WHO COORDINATING COMMITTEE EUROPE**

Twenty seventh Session

Warsaw, Poland, 5 - 8 October 2010

IMPLEMENTATION OF THE CODEX STRATEGIC PLAN 2008 – 2013

Comments in reply to CL 2010/23-EURO (Part A), CL 2010/36-EURO (i), CL 2010/44-EURO (1)

A. ACTIVITY 4.5 “PROMOTE INTERDISCIPLINARY COORDINATION AT THE NATIONAL AND REGIONAL LEVEL”

ARMENIA

As there is no Codex National Committee established yet, the Circular Letter has been prepared and sent to the government institutions (Food Safety and Veterinary State Inspectorate of the Ministry of Agriculture; Ministry of Health; Ministry of Economy) asking to designate a person from each body to work with CCP in order to raise the awareness on Codex activities among different stakeholders and give them an opportunity to be involved in Codex work. As a result, the persons have been identified from each institution and currently they work with CCP. According to relevance, all correspondence (including CLs, reports, information documents, etc.) is sent to the interesting parties including NGOs.

In the framework of “Food Safety Capacity Building” FAO TCP/RER/3003(A) the Workshop on “Activization of Armenia’s Participation in Codex Alimentarius and Assistance in Establishing Codex National Committee” was organized in Yerevan in 2009 with participation of relevant stakeholders (Ministry of Agriculture, Ministry of Health, Ministry of Economy, Consumer’s NGOs, International Organizations /such as FAO Representation, UNIDO, USDA/CARD/, State Agrarian University of Armenia).

As a result, the Draft of the Establishing National Codex Committee has been prepared and is submitted to all interested parties for endorsement, including government bodies and consumer’s NGOs.

EUROPEAN UNION

- Activity 4.5 "Promote interdisciplinary coordination at the national and regional level": The European Union (EU) has established efficient mechanisms to ensure coordination between the positions taken at the various international standard setting bodies. The EU is a full member of the Codex Alimentarius Commission (2003) and of the International Plant Protection Convention (2004) and has an observer status at the World Organisation for Animal Health. All positions prepared for these 3 organisations are fully coordinated and agreed with the 27 EU Member States during specific meetings organised by the Council of the European Union which are chaired by the Country holding the Presidency at that time (currently Belgium). At administrative level, the European Commission has concentrated all services in charge of these activities in the Directorate General in charge of Health and Consumers; other directorates general are also involved when appropriate (e.g. Agriculture, Fisheries, Environment, etc). Each EU Member State is responsible of the coordination at the national level and has put in place mechanisms to ensure coordination between the various delegates who may be attached to different ministries (e.g. Ministry in charge of health and Ministry in charge of agriculture). In the recent years, tremendous efforts have been deployed to put in place evaluation mechanisms which include audit activities in compliance with the relevant international standards.

B. ACTIVITY 5.5: ENHANCE PARTICIPATION OF NON-GOVERNMENTAL ORGANIZATIONS AT INTERNATIONAL, REGIONAL AND NATIONAL LEVEL

ARMENIA

In the framework of “Food Safety Capacity Building” FAO TCP/RER/3003(A) the Workshop on “Activization of Armenia's Participation in Codex Alimentarius and Assistance in Establishing Codex National Committee” was organized in Yerevan in 2009 with participation of relevant stakeholders (Ministry of Agriculture, Ministry of Health, Ministry of Economy, Consumer’s NGOs, International Organizations /such as FAO Representation, UNIDO, USDA/CARD/, State Agrarian University of Armenia).

As a result, the Draft of the Establishing National Codex Committee has been prepared and is submitted to all interested parties for endorsement, including government bodies and relevant NGOs.

Besides, all correspondence received from Codex headquarter (including CLs, reports, information documents, information on EWGs, etc.) is sent to the interested parties according to relevance, including NGOs.

CZECH REPUBLIC

We established processes for consultation on Codex matters to ensure effective involvement and participation of all in the standard setting process. We cooperate with the supervisory authorities and in particular NGOs, such as associations of producers.

EUROPEAN UNION

The European Union and its Member States have always supported participation on non governmental organizations (NGO) in the work of Codex at all levels. The expertise, experience and opinions brought by these NGO are invaluable and help to ensure that standards developed by Codex are consensual and can be applied widely. At the level of the European Commission, frequent contacts are taking place with the NGO representing all sectors of the society (e.g. industry, consumers) to exchange views and positions and a specific formal advisory forum with representative members has been created to give input on all legislative activities and also on international standardization.

GEORGIA

The National Service of Food Safety, Veterinary and Plant Protection with collaboration the Ministry of Labour, Health and Social Affairs of Georgia established a network of interested bodies within Georgia, in which it is included:

- National Agency of Standards, Technical Regulations and Metrology of Georgia;
- Ministry of Labour, Health and Social Affairs of Georgia
- National Center for Accreditation;
- Consumer’s Federation of Georgia;
- “Biocodex” - Production Certification Body;
- Ministry of Environment Protection and Natural Resources;
- Agrarian Issues Committee

POLAND

The Codex Contact Point for Poland is well structured, mobile body which through the 47 years of its existing has created effective network of communication with all interested bodies. The involvement of co-operating bodies in Codex work is still being improved. It has been realized among other things by up-dating *the Internal Procedure of Proceeding within the Codex Works at the National Level* and making the surveys among all co-operating bodies (on defining issues of special concern for Poland covered by Codex, on usefulness of National Codex Contact Point website and on difficulties encountered in the use or application of Codex Standards and related texts at the national level and in the opinion making process).

Codex Contact Point for Poland co-operates with c.a. 50 national partners i.e. governmental and non-governmental bodies, consumer's and food industry associations, scientific institutes, universities and other parties interested in Codex works.

The rules of proceeding in the area of Codex at the national level are set in The Internal Procedure of Proceeding within the Codex Works at the National Level (elaborated by the Codex Contact Point for Poland). The document was consulted with all relevant official authorities as well as with non-governmental organizations interested in Codex. Despite the fact that all Codex activities at the national level are supervised by the Codex Contact Point, the procedure appoints for each of the Codex Committees one governmental body (selected on the basis of the scope of its competences) which plays the role of a leader – final decision maker.

Polish Codex Contact Point fulfils 9 core functions of Codex Contact points set out in the Procedural Manual. Moreover it acts as the national link between co-operating governmental institutions and the EU Council Secretariat. Codex Contact Point co-ordinates the participation of Polish officials in the co-ordination meetings for the EU Member States within the Codex Alimentarius Working Party.

Received working documents are forwarded electronically to the all interested stakeholders.

Poland acknowledges that involvement of consumers and producers in setting of standards needs to be generally encouraged. Our intention is to improve education of consumers, dissemination of relevant information about Codex Alimentarius and better co-operation with consumer organizations. It was realised by the Codex Contact Point in the following ways:

- ◆ making 4 surveys on defining issues of special concerns for Poland covered by Codex, on usefulness of National Codex Contact Point website and on difficulties encountered in the use or application of Codex Standards and related texts at the national level and in the opinion making process. Feedback received from the co-operating bodies helped to improve co-operation on the line Codex Contact Point – interested organisations,
- ◆ preparation and distribution of information brochures and publishing articles in specialized magazines presenting the structure and the scope of activities of Codex Alimentarius and Codex Contact Point for Poland,
- ◆ distribution of invitations to the FAO/WHO Regional Workshop on Codex Alimentarius, which was organized in collaboration with the Governments of Switzerland and Poland in Warsaw in 2007 and 2008. The next workshops are scheduled for 4th of October 2010 (before the CCEURO session).
- ◆ national conference, held in May 2010, addressed to all co-operating organisations with the aim of presenting and clarifying Codex Alimentarius as well as CCP for Poland procedures.

Prior to each Codex meeting which Polish delegates are going to participate in, detailed instruction for delegates is prepared with co-operation with all partners and when there is a need to discuss issues of special concerns for Poland, internal co-ordination meetings are being convened by the Codex Contact Point with representatives of all stakeholders concerned.

The Codex Contact Point for Poland has created well structured communication network with co-operating bodies. It is based on e-mail and website www.ijhars.gov.pl where every interested party may find detailed information on Codex Alimentarius, news, information about sessions and working papers but also reports of Polish delegates on their attendance in the meetings.

SLOVAK REPUBLIC

See further parts of the questionnaire (Agenda Item 4)

SWEDEN

Participation of NGO:s at different levels of the legislative process is encouraged in Sweden. See also our response in Part B (Agenda Item 4).

TURKEY

Yes, we have subcommittees to prepare regulations. Before a Codex Meeting, related subcommittee is informed by secretariat and prepare the country position. Sub-committees include all related parties (universities, consumers, industry, other Ministries); so all interested parties on the related issue can participate to country position preparation meetings and also attend to Codex session.

C. PREPARATION OF THE REVISED STRATEGIC PLAN FOR 2013-2018

ARMENIA

The current five goals are still relevant, however, it seems to be necessary to promote cooperation among Codex members at least at the regional level through mentoring, twinning and networking activities.

EUROPEAN UNION

(1) Preparation of the revised Strategic Plan 2013-2018

a) Are the current five goals still relevant? What changes would you propose (if any)?

- **Objective 1: Promoting sound regulatory frameworks.** The EUMS are of the opinion that Objective 1 is still relevant and should be kept unchanged.

- **Objective 2: Promoting widest and consistent application of scientific principles and risk analysis.** The EUMS are of the opinion that this objective could be adapted to reflect more the current challenge which is the difficulty of a number of countries to agree on some Codex standards, because the so-called "other legitimate factors" are not sufficiently well defined in the Codex context and how to make use of them in specific instances, is left very vague. The EUMS would suggest an amendment in the wording of this objective which could become "**Promoting widest and consistent application of risk analysis**" with a view to underline that at the step of risk management, which is mainly the step where Codex work is placed within the overall context of risk analysis, science is certainly an essential element in the risk analysis process to be considered but other considerations can also be part of the final conclusion.

- **Objective 3: Strengthening work management capabilities.** This objective is still valid but more emphasis might be put in the development of new working methods such as limited size working groups, which would help Committees to work more rapidly and efficiently, while fully respecting the principles of transparency, openness and representativeness.

- **Objective 4: Promoting cooperation between Codex and other relevant international organisations.** The EUMS are of the opinion that priority should be given to the development of a closer cooperation with the 2 other "sister organizations", the OIE and the IPPC under the global supervision of the SPS Committee where the global picture encompassing all aspects of sanitary and phytosanitary measures can better be perceived. In that sense, this objective could be reworded "**Promoting cooperation between Codex and other relevant international organisations, in particular OIE and IPPC**".

The EUMS are convinced that joint standards between Codex, OIE and/or IPPC, where necessary and appropriate, would represent a significant progress, in particular when dealing with horizontal questions such as antimicrobial resistance, certification or control of zoonoses.

Objective 5: Promoting maximum and effective participation of members. The EUMS are of the opinion that this objective is more relevant than ever and that further efforts should be delivered to improve the current situation which is still not entirely satisfactory.

b) The 2003-2007 Framework did not include measurable indicators, as does the current Strategic Plan. Should the next Strategic Plan include measurable indicators? Is the current "table" format useful or would you suggest changes? For example, is it useful to track "ongoing" activities?

Measurable indicators are a useful tool in the sense that they allow to quickly assess the progress made. However they are often giving a very partial idea of the exact situation. For example, a measurable objective could be the number of standards adopted every year by the Commission, but would that give an idea of the relevance, pertinence and appropriateness of the work carried out? The EUMS are not opposed to the development of measurable indicators but remain to be convinced on their representativeness.

The EUMS support the current table format which has the merit to clearly identify all the actions included in one objective as well as all the data relevant to each action.

c) What are the most significant challenges facing Codex? What goals/activities should be included in the next plan to insure that these challenges get the necessary attention?

The EUMS are of the opinion that one of the most significant challenges facing Codex beside the participation of developing countries is certainly the issue of private food safety standards. This subject has been extensively discussed at several sessions of the CAC and is also on the agenda of the 2 other "sisters" and the SPS Committee, from which some clarification would be welcome as regards the definition of private standards and their controversial coverage by the SPS Agreement. The EUMS argue for the SPS Committee to remain the main forum for discussing private food safety standards, but would not be opposed to participation to Codex work of private standard setting bodies as observers.

d) Given the fact that developing country participation in the work of Codex is presently a major issue, what goals/activities should be included in the next plan to insure that this issue gets necessary attention in 2013-2018?

The Codex Trust Fund (CTF) has allowed since its implementation an improvement of the level of attendance of developing countries at the sessions of Codex Committees, but the current situation is still not fully satisfactory. The EUMS were pleased with the outcome of the Codex Trust Fund Mid-term Review and fully support the recommendation to pay more attention to the second objective of the CTF "Strengthening overall participation and expected output". This second objective could be included in Objective 5: Promoting maximum and effective participation of members on the forthcoming Strategic plan.

A possible activity to be included in the Strategic Plan under Objective 5 could be: Implementing a mentoring programme to improve efficient active participation of developing countries in Codex work.

e) Do current Codex structures and procedures adequately meet present needs of members (i.e., various "step procedure" options, critical review by CCEXEC, etc.)? What changes might be considered?

The EUMS are of the opinion that the current system seems to work in an acceptable manner. The EUMS note that the Evaluation of Codex carried out in 2003 recommended to work towards greater efficiency and effectiveness in the development of Codex standards, whilst maintaining transparency and inclusiveness and procedural consistency in the process of their development. In particular, it was proposed to reduce the number of steps from 8 to 5. While this proposal was not retained, the EUMS note that its feasibility has already been demonstrated by the fact that many standards are currently finally adopted at step 5/8 with the omission of Steps 6 and 7.

f) The Commission operates in an environment of change and technological advancement. Should issues such as the food safety consequences of climate change, and new production technologies such as nanotechnology, etc., be reflected in the new Strategic Plan? If so, how?

The EUMS are of the opinion that the CAC should always remain attentive to the implementation of new technologies in the production of foods and to the new challenges, and be prepared to put in place the appropriate structures when needed, as it did in the past (e.g. Taskforce on Food Derived from Biotechnology). The EUMS are however not convinced of the need to introduce a specific goal/activity in the Strategic Plan.