

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 4 b)

CX/FFP 03/5-Add.1

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Twenty-sixth Session
Ålesund, Norway, 13 - 17 October 2003

PROPOSED DRAFT MODEL CERTIFICATE FOR FISH AND FISHERY PRODUCTS (OTHER CERTIFICATES)

GOVERNMENT COMMENTS AT STEP 3 (United States of America- Additional comments)

The United States strongly recommends that the Committee should discontinue work on Appendix X and Annex II.

Reason:

It is not clear to us when a Model Inspection Certificate would be used in routine international trade in fish and fishery products. As we have suggested in other comments, the Model Sanitary Certificate should be the routine certificate. We are concerned that, among other things, The Model Inspection Certificate would be a technical barrier to trade if used as a requirement by any country for routine use because it would be based on sampling analyses and examinations of shipments of imports that are not required for domestic products. For this reason, we are recommending that the Model Inspection Certificate be dropped. For non-routine situations the Model Statements (Annex III and IV) would be more useful alternatives.

Annex III

Delete the first sentence below the space for the certificate number regarding guarantee of food safety and wholesomeness.

Reason:

Regulatory authorities are not in a position to be guarantors. To us a "guarantee" involves an absolute "100%" assurance. For that reason alone Codex Alimentarius should not designate regulatory bodies as guarantors. We know of no inspection schemes or sampling procedures that can support a 100% assurance.

Annex IV

Model Certificate Attestation

The attestations for these certificates are not in conformance with the other Model Certificates that are signed by the official inspector. We suggest that the signatures of the Director General and Division Head of the competent authority not be a requirement.

Reason: Obtaining signatures of high officials is both unnecessary and overly burdensome.