

# codex alimentarius commission



FOOD AND AGRICULTURE  
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JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

**Agenda Item 5 (c)**

**CX/FH 04/5 - Add. 3  
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## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COMMITTEE ON FOOD HYGIENE**

#### **Thirty-sixth Session**

**Washington DC, United States of America, 29 March – 3 April 2004**

### **DISCUSSION PAPER ON THE DEVELOPMENT OF OPTIONS FOR A CROSS-COMMITTEE INTERACTION PROCESS**

*Prepared by Australia with the assistance of France, Norway, New Zealand, the United States and the EC*

#### **BACKGROUND**

The 35<sup>th</sup> session of the Codex Committee on Food Hygiene (CCFH) noted that much of the work under consideration by the CCFH crosses boundaries between areas that are the responsibility of CCFH and its sister committees. Similarly, CCFH sister Committees elaborate work that impacts on CCFH priorities such as the development, and the subsequent need to endorse, hygienic Codes of Practices. It was considered that development of processes to strengthen interaction between CCFH and its sister Committees would facilitate a more efficient and timely completion of Codex work.

Consequently, it was agreed (ALINORM 03/13A para 180) that a drafting group lead by Australia and with the assistance of France, Norway, New Zealand, the United States and the EC would develop a discussion paper outlining a proposal for a cross-Committee interaction processes, for circulation, comment and further consideration at its next meeting.

It was further agreed that when considering this task, the drafting group would need to consider:

- Existing processes directing cross-Committee interaction, including the relevant advice set out in the Codex Alimentarius Procedural Manual, such as the section on Relations between Commodity Committees and General Subject Committees,
- Ongoing work in the Joint FAO/WHO Evaluation of the Codex Alimentarius' and Other FAO and WHO work on Food Standards

- The work assigned to the drafting group examining the work priorities of the CCFH
- The criteria proposed in CX/FH 03/6 (Proposed Draft Process by which the Codex Committee on Food Hygiene could Undertake its Work in Microbiological Risk Assessment /Risk Management),

The drafting group has undertaken this task through the development of the attached Discussion Paper.

#### **RECOMMENDATIONS**

It is recommended that the Committee consider the following options for communication processes between CCFH and its sister Committees to facilitate timely and effective elaboration of CCFH work:

- An ongoing item on the CCFH agenda that would be tabled at each CCFH Session for discussion about communication needs arising from the Committee session and the action/advice that is requested from its sister Committees.
- Negotiation of a formal item on the agenda of the sister Committees to do the same as above.
- Negotiating timely response/outputs to CCFH requests and vice versa through a defined process.
- Any requests for advice/action communicated to sister Committees on specific issues should be formalised and be focused on desired outcomes.
- Chairs of CCFH and its sister Committees attend each other's Sessions and are responsible for communication, as agreed at their Sessions.
- Drafting groups on matters that deal with matters of mutual interest could include representative/s from the sister Committee.

Once worked out, these processes could be incorporated in the process document "Proposed Draft Uniform Procedure for the Elaboration of Microbiological Risk Management and Related Texts", drafted by USA for the next CCFH Session.

## Annex 1

**DISCUSSION PAPER ON THE DEVELOPMENT OF OPTIONS FOR A CROSS-COMMITTEE INTERACTION PROCESS****1 INTRODUCTION**

- 1 The 35<sup>th</sup> session of the Codex Committee on Food Hygiene (CCFH) noted that much of the work under consideration by the CCFH might also be applicable to ongoing work in other Codex committees (and vice versa), and that it was advisable that the processes for cross-committee interaction be strengthened to share the necessary expertise and advice across these Committees and facilitate and more efficient and effective completion of the work in these Committees.

***Codex Committees whose work is interconnected with the work of CCFH***

2. The work of CCFH could be described as falling into two general categories, namely the development of recommended Codes of Practice (RCP), which may include quantitative standards, and the development of guidelines (GL). A number of CCFH sister Committees (listed in Attachment 1) are also responsible for the development of Codes of Practice for the hygienic production of specific foods. CCFH has a specific mandate that impacts on some of its sister Committees: sections of standards that contain hygiene provisions developed by these Committees are sent to CCFH for endorsement at the most suitable times during Steps 3,4 and 5 of the procedure for the Elaboration of Codex Standards and Related Texts.

***Other bodies whose work is interconnected with the work of CCFH and its sister Committees***

3. CCFH, where appropriate, seeks and receives risk assessment advice from the FAO/WHO Joint Expert Group on Microbiological Risk Assessment (JEMRA) in order to inform its risk management recommendations. The elaboration of risk management recommendations by CCFH may be dependent on the timeliness and appropriateness of the risk assessment advice provided by JEMRA. The procedure by which CCFH engages JEMRA is currently under development in the Discussion Paper “*Proposed draft Uniform Procedure for the Elaboration of Microbiological Risk Management and Related Texts*”.
4. A number of processes for communication between Committees are already in place. The Procedural Manual states in its section on Relations between Commodity Committees and General Committees that: “*Communication between Committees on specific subjects of interest may be requested by any Committee and is the responsibility of the Codex Secretariat.*”
5. While this allows for a formal communication to be passed from CCFH and its sister Committees and back to CCFH, this process can be relatively slow. The matters to be communicated as raised at the respective Committee meetings are recorded in the proceedings, and verbally transmitted to the receiving Committee by the Codex Secretariat, often taking a year or more to effect an exchange. Such communications have a tendency to be passive and do not offer much opportunity for clarification or critical debate.
6. The Procedural Manual also states that Chairs of Committees are able to communicate directly on any matter. While this process is necessary to inform on issues of mutual interest and concern, it places all responsibility for expanding on an issue to the relevant Committee with its chair and again, provides little avenue for a wider debate between the Committees.

## 2 CHANGING ENVIRONMENT AND THE WORK OF CCFH

### *Recent changes*

7. The environment within which CCFH must do its work has changed over the last decade. The most significant changes included the advent of HACCP approach to food safety in the last 15 years and the adoption of the risk-based approach to the management of food safety in mid-to-late 1990s by CAC. The recognition of the Codex standards and texts as international points of reference by the World Trade Organization (WTO) in 1995, and the introduction of the concept of Appropriate Level of Sanitary or Phytosanitary Protection (ALOP) through the WTO Sanitary and Phytosanitary (SPS) Agreement focused attention on Codex standards as an internationally agreed means of achieving food safety, as well as facilitating trade in food.
8. The report of the *Joint FAO/WHO Evaluation of the Codex Alimentarius and Other FAO and WHO work on Food Standards* raised a number of issues in relation to cross-committee interaction. These included:
  - The need to be clear about the division of responsibilities between horizontal and vertical committees.
  - Recognition that the process of ‘endorsement’ of provisions in Codex standards can raise inconsistencies and slow down the development of standards.
  - A need for greater speed in Codex and expert scientific advice

Consideration of these issues by the Commission at its 26<sup>th</sup> session resulted in decision that included the statement that: ‘*All work be time bound with a general requirement to complete work within a five year period* ‘.

### *Impact of these recent changes on the work of CCFH and its sister Committees*

9. These changes have expanded the range and impact of CCFH recommendations and added to the significance of the work of its sister Committees. To accommodate these changes, the terms of reference of CCFH were amended in 2001 by CAC to include matters relating to risk assessment and risk management. As CCFH elaborates guidelines and principles in this new area, it is clear that they will have a significant impact on the work undertaken by its sister Committees. The quality, appropriateness and consistency of work elaborated by these Committees and CCFH on food hygiene matters require effective communication processes in both directions.
10. The increasing pressure to speed up the work of Codex demands that CCFH and its sister Committees work together to minimise unnecessary delays and misunderstandings that are caused by inadequate communication and impact on the timely and effective completion of work of mutual responsibility.

## 3 THE NEED FOR MORE EFFECTIVE COMMUNICATION PROCESSES BETWEEN CCFH AND ITS SISTER COMMITTEES

11. While the existing processes allow for communication between General and Commodity Committees, it could be argued that they tend to be passive because they focus on the transmission of written messages between Committees, through the Codex secretariat. They also take substantial time to deliver, because communication coincides with the relevant Committee meeting, usually annually or less frequently. The communication from CCFH is often unspecific and does not necessarily seek answers to specific questions, which would effectively inform the next round of discussions.

***Faster and more effective endorsement of Codes of Practice forwarded by sister Committees to CCFH***

12. As various Commodity Committees submit their draft Codes of Hygienic Practice to CCFH for endorsement, it is important that the progress of these standards to the subsequent steps of the Codex procedure is facilitated by timely process of endorsement.
13. In most cases, endorsement by CCFH necessitates substantial discussion by that Committee and includes proposals for changes to the draft standards that are submitted to the sister Committee for consideration. This process may be repeated on several occasions and can take substantial time as these exchanges depend on written comments and are communicated most often at the annual meetings of each relevant Committee. There is no effective process in place to allow opportunity for discussion between CCFH and its sister Committees on matters raised. This can, at times, result in lengthening of the endorsement process.

***Guidance from CCFH to its sister Committees on work in progress on principles and guidelines that underpin the Codex work on hygiene***

14. The timely development of Codes of Practice elaborated by CCFH sister Committees may also be affected by work elaborated within CCFH; such as the *Proposed Draft Principles and Guidelines for the Conduct of Microbiological Risk Management* or “*the Discussion Paper on Proposed Draft Guidelines for the Validation of Food Hygiene Control Measures*”. The progress of these Codes would benefit from effective and timely guidance from CCFH to these Committees in the early stages of their work, on principles that underpin the risk management recommendations on microbiological food safety matters.

***Development of principles and guidelines that are appropriate and informed by expertise from CCFH’s sister Committees***

15. Conversely, the appropriateness of principles and guidelines elaborated by CCFH benefits from the advice of its sister Committees. Elaboration of risk management approaches for certain pathogens developed in CCFH, such as the “*Guidelines for control of Listeria monocytogenes in Foods*” and the various discussion papers on risk management of *Campylobacter*, *Salmonella*, *Vibrio* and *Enterohaemorrhagic E. coli* will have impact on the work of sister Committees. Such work would benefit from the expertise, active discussion with, and advice from specific sister Committees. A team approach between CCFH and the relevant sister Committee is likely to speed up the task.

***Communication to inform the priority-setting process***

16. Where the work undertaken by a sister Committees cannot progress because it is dependent on progressing specific principles or guidelines within CCFH, it is important that this dependency is communicated and discussed with the sister Committee to enable reassessment of priorities in each Committee for the effective management and delivery of respective workloads. The setting of priorities is a subject of a separate Discussion paper (*Development Of Process, Procedures And Criteria To Establish Priorities For The Work Of The Codex Committee On Food Hygiene*).

**4 OPTIONS FOR IMPROVED PROCESSES FOR CROSS-COMMITTEE INTERACTION**

17. A number of additional processes could be established within the CCFH processes to communicate effectively with its sister Committees and improve the timeliness and effectiveness of the work elaborated and endorsed by CCFH. These include:

- An ongoing item on the CCFH agenda that would be tabled at each CCFH Session for discussion about communication needs arising from the Committee session and the action/advice that is requested from its sister Committee.
- Negotiation of a formal item on the agenda of the sister Committees to do the same as above.
- Negotiating timely response/outputs to CCFH request and vice versa.
- Communication to sister Committees on specific issues should be formalised and be focused on desired outcomes.
- Chairs of CCFH and its sister Committees attend each other's Sessions and are responsible for communication as agreed at their Sessions.
- Drafting groups on matters that deal with matters of mutual interest could include representative/s from the sister Committee.

***Ongoing item on the CCFH agenda for discussion and action.***

18. The prioritised work plan for CCFH and its sister Committees would serve to inform CCFH about issues of common interest that require exchange of information and advice. The paper would generate discussion and propose areas for action. (Issues of interest could include the need to communicate to sister Committees on principles and guidelines that will impact on the work of sister Committees; the need to engage in the work of sister Committees where the work will need to be endorsed by CCFH; the need to seek input into draft management strategies for pathogens of interest, etc).
19. Negotiating a formal agenda item on the agenda of sister Committees would ensure that each sister Committee considers issues identified by CCFH and allocates time for discussion and action. It will place reporting requirements on each Committee and affect communication.
20. Terms of Reference may need to be negotiated for the interaction for CCFH and its sister Committees. This could be proposed at the Session and worked through the Codex processes.
21. The agenda item could be the responsibility of a specially nominated drafting group, the Codex Secretariat or the US Codex Secretariat.
22. Communication could be the responsibility of Chair of the Committee and/or Codex Secretariat. Communication could occur electronically.

***Communication to sister Committees on specific issues should be formalised and focused on desired outcomes***

23. Formal communication should be prepared at the CCFH Session and a formal response requested from the sister Committee in question. The communication should state the questions that need to be answered, nature and detail of the advice that is sought and any impact that is expected from the work of CCFH in progress. Focusing on desired outcomes should achieve better engagement and a more targeted approach to issues.
24. In addition to specific questions, the formal communication could include feedback about whether the document in question is of use to the sister Committee, which aspects are of relevance and how they could be made even more useful.
25. The communication could be prepared by the lead country responsible for the agenda item, in response to discussion at the Session or previously in the working/drafting group meeting.

***Negotiating timely response/outputs to CCFH request and vice versa***

26. There is a need to ensure that sister Committees make the same commitment to communication processes that aim to improve the timeliness and effectiveness of work of mutual interest. This could be achieved through discussion and agreement between chairs and also in the context of the Procedures of the Codex Alimentarius.

***Chairs of CCFH and its sister Committees attend each other's Sessions***

27. Chairs could attend the relevant segments or all of the Session and be the conduit for providing information and advice to that Committee on matters that need to be communicated and action required. They will have some capacity to provide more detail and clarification of any requests, obviating the need to clarify later, thereby saving time and confusion or inappropriate response. They will also be able to do the same in their own Committees.
28. This process would also allow the chairs to facilitate appreciation of the policy context within which CCFH and sister Committees operate.
29. This option places a burden on the time chairs may need to spend in sister Committee meetings, and places especial burden on the chair of CCFH who would have to attend all sister Committee meetings when there are matters of mutual interest on the agenda of that Committee. The impact of this option needs to be clarified when work plans and priorities of these Committees are better understood. This option has resource implications for the Chairs.
30. Alternatively this might be a role that could be undertaken by deputy chairs (if appointed) or chairs/leaders of working/drafting groups having carriage of the specific subject.

***CCFH working/drafting groups on matters that deal with matters of mutual interest could include representative/s from sister Committees***

31. The representative/s from the sister Committee would provide advice and comment and also serve as a conduit of more detailed information back into the deliberations of the sister Committee. One simple approach would be for a working/drafting group member to seek input from a colleague in his or her own country whose responsibility is to the sister Committee. Another approach is to seek nominations from the sister Committee through the Chairs. This option would provide an additional conduit of communication between committees.

**ATTACHMENT 1****CCFH AND ITS SISTER COMMITTEES****CODEX COMMITTEE ON FOOD HYGIENE (CX-712)****Host Govt: USA*****Terms of reference:***

- a) To draft basic provisions on food hygiene applicable to all food;
- b) To consider, amend if necessary and endorse provisions on hygiene prepared by Codex commodity committees and contained in Codex commodity standards, and
- c) To consider, amend if necessary, and endorse provisions on hygiene prepared by Codex commodity committees and contained in Codex codes of practice unless, in specific cases, the Commission has decided otherwise, or
- d) To draft provisions on hygiene applicable to specific food items or food groups, whether coming within the terms of reference of a Codex commodity committee or not;
- e) To consider specific hygiene problems assigned to it by the Commission;
- f) To suggest and prioritize areas where there is a need for microbiological risk assessment at the international level and to develop questions to be addressed by the risk assessors;
- g) To consider microbiological risk management matters in relations to food hygiene and in relation to the risk assessment of FAO and WHO.

**CODEX COMMITTEE ON PROCESSED FRUITS AND VEGETABLES (CX-713)****Host Govt: USA*****Terms of reference:***

To elaborate world wide standards for all types of processed fruits and vegetables including dried products, canned dried peas and beans, jams and jellies, but not dried prunes, or fruit and vegetable juices. The Commission has also allocated to this Committee the work of revision of standards for quick frozen fruits and vegetables (see page 138).

**CODEX COMMITTEE ON MEAT HYGIENE (CX-723)****Host Govt: New Zealand*****Terms of reference:***

To elaborate world wide standards and/or codes of practice as appropriate for meat hygiene.



**CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS (CX-722)**

**Host Govt: Norway**

*Terms of reference:*

To elaborate world wide standards for fresh, frozen (including quick frozen) or otherwise processed fish, crustaceans and molluscs.

**CODEX COMMITTEE ON FRESH FRUITS AND VEGETABLES (CX-731)**

**Host Govt: Mexico**

*Terms of reference:*

- a) to elaborate world wide standards and codes of practice as may be appropriate for fresh fruits and vegetables;
- b) to consult with UN/ECE Working Party on Standardization of Perishable Produce in the elaboration of world wide standards and codes of practice with particular regard to ensuring that there is no duplication of standards or codes of practice and that they follow the same broad format;
- c) to consult, as necessary, with other international organizations which are active in the area of standardization of fresh fruits and vegetables.

**CODEX COMMITTEE ON MILK & MILK PRODUCTS (CX-703)**

**Host Govt: New Zealand**

*Terms of reference:*

To elaborate worldwide standards, codes and related texts for milk and milk products.