

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 3

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Revised

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Thirty-seventh Session

Buenos Aires, Argentina, 14 - 19 March 2005

COMMENTS ON THE

DISCUSSION PAPER ON THE MANAGEMENT OF THE WORK OF THE COMMITTEE

Submitted by: Guatemala and Consumers International (CI)

Guidelines for Considering New Work

CI

Item 1, last bullet and Annex I, Decision Tree to assist with Reviewing New Work Proposal; Consumers International is concerned that in some cases, particularly for emerging problems, there may not be "sufficient" scientific knowledge or data available to provide or obtain guidance that is considered by all parties to be scientifically sound.

The Commission recognized such situations in its 2001 decision:

“When there is evidence that a risk to human health exists but scientific data are insufficient or incomplete, the Commission should not proceed to elaborate a standard but should consider elaborating a related text, such as a code of practice, provided that such a text would be supported by the available scientific evidence” (para. 83);

This decision by the Commission makes it clear that codes of practice or texts other than standards can be elaborated in cases where scientific information is insufficient. Students of epidemiology will recall the famous Broad Street pump cholera epidemic of 1854 in which many lives were saved simply by removing the handle of the pump where residents obtained water, even though there was very little scientific knowledge at that time regarding the link between cholera

and water hygiene--indeed, this incident preceded the acceptance of basic germ theory. Similarly, CCFH should be able to undertake work which could save lives or at least decrease risks even when scientific information is less than desirable.

The amount of scientific information available is certainly relevant to the type of work that would be undertaken by the Committee, or by JEMRA, but it is not necessarily relevant to deciding whether the Committee should undertake work at all. The primary criteria is whether the issue is significant to public health. Thus, we recommend that this final bullet be deleted, and the flowchart amended accordingly.

Annex I

GUATEMALA

- It was considered that work undertaken by the Codex Committee on Food Hygiene must fall within the guidelines of the Codex Alimentarius Commission Procedural Manual, particularly according to Section I: Procedures for the Elaboration of Codex Standards and Related Texts, and Section II: Codex Criteria for the Establishment of Work Priorities. Consequently, the Decision Tree must be amended to specifically include the work approval step to be taken by the Codex Alimentarius Commission (CAC).
- The relationship that exists among the three developed decision trees must be indicated.
- The flow in the decision trees is very limited; there are no alternative options presented. We recommend improving the flowchart by including alternatives such as requesting more data, scientific studies, and reconsidering priorities, among others.