

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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Agenda Item 3b)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON GENERAL PRINCIPLES

Seventeenth Session
Paris, France, 15 - 19 April 2002

THE APPLICATION OF RISK ANALYSIS IN THE ELABORATION OF CODEX STANDARDS Government comments

CANADA

BACKGROUND

The 23rd Session of the Codex Alimentarius Commission adopted the Medium-Term Plan for 1998 - 2002. One of the objectives identified in the Plan was that the integration of risk analysis principles into the Codex decision-making process should be completed in the period covered by the Plan. It was noted in the Plan that, to accomplish this, changes would have to be introduced to the "Procedures for the Elaboration of Codex Standards and Related Texts", the "General Principles of the Codex Alimentarius", and the "Criteria for Establishing Work Priorities". The *Medium-Term Plan* noted that guidance on the application of risk analysis for Codex Committees ought to be included in the *Procedural Manual* and guidance developed for Member Governments should be included in the *Codex Alimentarius* itself¹.

At the Commission, the Delegation of India stressed the importance of taking into account the situation in developing countries since primary production was largely through small and medium-scale enterprises. India noted that data from developing countries should be included in the risk assessment process. India, supported by other delegations, expressed the view that the economic consequences and feasibility of risk management options should also be considered in the risk management process.

At the 15th Session of the CCGP, the Delegation of India drew the attention of the Committee to its concerns that Codex was developing standards which, in the opinion of the Delegate, were not consistent with the JECFA risk assessment (specifically Aflatoxin M₁ in milk and lead in butter).

India presented a paper on Risk Analysis at the 16th Session of the CCGP but, due to time constraints, the paper was not fully considered. It was agreed that the paper should be circulated for comments and be considered at the 17th Session of the Committee.

CANADIAN POSITION

Canada would like to thank India for their efforts in preparing this document for consideration by the Committee.

In principle, Canada supports some of the recommendations put forth by India as they are consistent with recommendations adopted by the Codex Alimentarius Commission at its 23rd Session.

¹ Alinorm 99/37, Appendix II, paragraph 3

Canada would note that one of the recommendations (bullet 11) states: “*For collecting such data and attending meetings where risk assessment studies are being considered and values finalised, funds should be made available to developing countries.*” Canada recognizes and supports the need to provide assistance to developing countries to enable them to develop the necessary infrastructure to allow for the collection of relevant food safety and epidemiological data. We are, however, of the view that clarification is required with respect to the attendance at “*...meetings where risk assessment studies are being considered and values finalised...*”. It should be noted that invitations to attend meetings of expert consultations are based upon an individual’s expertise. Individuals who serve on expert consultations are there in their capacity as recognized experts, not to represent their country or organization. The expenses for experts to attend consultations is usually paid by FAO or WHO.

India also recommends that: “*A document on guidelines to be followed for risk assessment by Codex Committees needs to be prepared by CCGP*”. Canada is of the view that this recommendation is not consistent with Principle #3 of the “*Statements of Principle Relating to the Role of Food Safety Risk Assessment*” which have been adopted by the Codex Alimentarius Commission. We would note that Codex Committees do not do risk assessments. These are normally conducted by independent expert bodies convened jointly by FAO/WHO (e.g. JECFA, JMPR, *ad hoc* expert consultations).

While the intent of the proposals in India’s paper is to ensure that the consideration of global data in the risk analysis process is supportable, the mechanism must be sufficiently flexible to avoid impeding the development of important standards. In that respect, Canada finds some of the recommendations are somewhat restrictive. Of particular note:

Bullet #3 is overly restrictive in that not all proposals which could be advanced through the step process are based solely on risk analysis (e.g. labelling methods of analysis, etc..).

Bullet #4 must acknowledge that, while it is important to consider global data, these data must be available and, where data for a particular region are not available, progress should not be impeded if sufficient data to permit risk assessment exists.

Bullet #10 is not clear in its intent. If all data to be considered in each risk assessment are to be circulated to all member countries (following a round of requests for data to all member countries) with an opportunity to comment on the data before assessment begins, the process would become so unwieldy as to grind to a halt.

Bullet #11 would require significant provision of funds to permit developing countries to collect the necessary data for each risk analysis. While enhancing the capacity of developing countries is important and laudable, there must be consideration of priorities in support and capacity. The value of additional data from a particular region is dependent on the sufficiency of data already available to carry out risk analysis for a particular issue.