

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5

CX/GP 09/25/5

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON GENERAL PRINCIPLES

Twenty-fifth Session

Paris, France, 30 March - 3 April 2009

REVIEW OF THE RISK ANALYSIS POLICIES OF CODEX COMMITTEES

Background

The Strategic Plan of the Codex Alimentarius Commission includes the following activities under Goal 2. Promoting Widest and Consistent Application of Scientific Principles and Risk Analysis:

- Activity 2.1 Review the consistency of risk analysis principles elaborated by the relevant Codex Committees (completion by 2011)
- Activity 2.2 Review risk analysis principles developed by relevant Codex Committees (completion by 2013)
- Activity 2.3 Enhance communication among relevant Codex subsidiary bodies and the FAO/WHO scientific expert bodies (ongoing)

The 61st Session of the Executive Committee considered the implementation of the Strategic Plan 2008-2013. While noting that the Committees on Nutrition and Foods for Special Dietary Uses and on Food Hygiene had not completed their work for development of risk analysis policy documents in their respective area, agreed to recommend that the 25th Session of the Committee on General Principles (April 2009) initiate Activity 2.1 consider this matter and agree on a timeline of work and steps to follow to complete the review. Activity 2.2 would be started once Activity 2.1 was completed. (ALINORM 08/31/3A, para. 131).

As regards Activities 2.1, 2.2 and 2.3, the 31st Session of the Commission endorsed the recommendation of the Executive Committee. It was noted that it would be possible to start Activity 2.2 once Activity 2.1 was completed and that the outcome of Activity 2.3 would be taken into account under Activity 2.2. (ALINORM 08/31/REP, para. 133).

The 24th Session of the Committee on General Principles considered the Draft Risk Analysis Principles Applied by the Codex Committee on Pesticide Residues, and several comments were made in the discussion, especially as regards the need to ensure consistency between the documents describing risk analysis policies throughout Codex, and the discrepancies between the documents under consideration for pesticide residues and veterinary drugs and the risk analysis principles for additives and contaminants.

The Committee did not consider substantial changes, referred to the activities mentioned above in the Strategic Plan and agreed that, following the adoption of the text under consideration at the session, all adopted risk analysis policies should be reviewed by the Committee especially as regards their consistency with the general *Working Principles for Risk Analysis for Application in the Framework of the Codex Alimentarius*. The Committee endorsed the above document (ALINORM 07/30/33, para. 27-34) and also recommended that the Committee on Pesticide Residues review the MRL Periodic Review Procedure in the light of more recent documents related to MRL setting process and consider the relevance of this procedure to be published in the Procedural Manual (para. 159). The 31st Session of the Commission adopted the document with the understanding that, in accordance with the Strategic Plan, this matter could be further considered when the Committee on General Principles reviewed all relevant texts (ALINORM 07/30/REP para. 30-34).

The Committee on Pesticide Residues agreed at its 31st Session to request the approval of the Commission for new work on the revision of the *Risk Analysis Principles applied by the Codex Committee on Pesticide Residues*, which would incorporate the *Criteria for the Prioritization Process of Compounds for Evaluation by JMPR* and the *MRL Periodic Review Procedure* and take into account the above discussions, as well as the latest risk management policies developed by the Committee (ALINORM 08/31/24, para. 129-143).

General considerations

Several sets of principles for risk analysis already exist but some new developments or updates may take place in the near future. However, the Committee could initiate the process of reviewing the current principles for risk analysis in the relevant areas, while recognising that some of the texts under consideration may be amended and reconsidered. The Committee may also make some recommendations to the Committee that are still revising or developing risk analysis policies to take into account the need to ensure consistency with the general *Working Principles*.

As a general remark, it may be noted that the format of the principles for risk analysis developed by several committees do not always follow the structure of the Working Principles, but rather the respective responsibilities and tasks carried out by the Committee concerned or by the expert committees providing scientific advice, and this would be one of the main general aspects to take into account in the review.

The Committee on General Principles is invited to hold a general discussion on the main aspects to be taken into account in the review to provide a general orientation to this work. This would allow the Secretariat, FAO and WHO to prepare a detailed review that could be circulated for comments and considered by the next session of the Committee in order to progress this work according to the Strategic Plan. Some further considerations relating to specific areas are mentioned below.

Additives and Contaminants

The Risk Analysis Principles Applied by the Codex Committee on Food Additives and the Codex Committee on Contaminants in Foods do not follow the format of the Working Principles, insofar as the requirements are not presented as risk assessment, risk management and risk communication but describe activities of the Committees (CCFA and CCCF) and JECFA. A general suggestion would be to reorder the provisions according to the components of risk analysis. As these principles were developed when the Committee on Food Additives and Contaminants was still in existence as a single committee, and in view of possible differences or specificities regarding additives and contaminants, it might also be useful to consider whether two sets of principles could be developed for additives and for contaminants.

The sections describing the role of the CCFA and CCCF could be described under risk management, and those concerning JECFA under risk assessment. Although no specific section exist on risk assessment policy, it may be noted that paragraph 19 of the general *Working Principles* has been applied in practice in order to establish maximum levels for contaminants, by the CCFAC and more recently by the CCCF. It could therefore be useful to insert such a section on the establishment of maximum levels for contaminants. Some consideration could also be given to the insertion of a section on risk communication that could include the current provisions related to the interaction between risk assessors and risk managers.

Pesticide Residues

As indicated above, several issues were raised in the Committee on Pesticide Residues, the Committee on General Principles and the Commission on the risk analysis principles applied by the CCPR, and no specific proposals need to be made at this stage as they are under revision.

From a general point of view however, it may be noted the structure of the document does not follow the general Working Principles and recommendations to reorder the document might be considered. This might include the inclusion of a section on risk communication to include the current provisions related to the interaction between JMPR and the CCPR. The inclusion of a section on risk management policy including for example current paragraph 17 of the CCPR Risk Analysis Principles, referring to risk management options, could also be useful.

Residues of veterinary drugs

The risk analysis principles applied follow an approach corresponding to the steps of risk analysis and they will be considered further in more detail but no specific comments are made at this stage.