

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4 and 5

CRD16

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-seventh Session[

(Comments submitted by Egypt)

Agenda item 4

Egypt extends its gratitude to the chair and the members of the Electronic Working Group (EWG) for their commendable efforts in developing this proposed draft. In this context, Egypt would like to submit the following comments:

Decision Criteria:

Section 3 – Definitions stated that the Decision Criteria: Those factors used to objectively determine whether the exporting country's NFCS or the relevant part achieve the objectives of the importing country's NFCS or the relevant part for the products under consideration.

Position:

Upon reviewing the proposed draft consolidated Codex guidelines on equivalence and the relevant Codex texts concerning recognition, including the Guidelines for the Design, Operation, Assessment, and Accreditation of Food Import and Export Inspection and Certification Systems (CXG 26-1997) and the Guidelines for Food Import Control Systems (CXG 47-2003), it was acknowledged that there is a need for more dynamic and evolving rules regarding the decision criteria to be considered by both importing and exporting countries.

Rational:

Egypt emphasizes the significance of the proposed draft, highlighting that it offers a valuable opportunity to clarify key issues within the context of recognition that have previously led to ambiguity in interpreting the relevant texts. Egypt suggests that the decision criteria process in various sections should align with the term 'factors' as defined in the decision criteria. Specifically, the factors should be clearly indicated within the document's content, as the connection between the factors in the definition and the different steps in the document is currently unclear. This alignment would enhance the understanding of the proposed draft, benefit both importing and exporting countries, and ensure the decision criteria process is applied without ambiguity or misunderstanding in the future.

Agenda item 5

Egypt extends its gratitude to the chair and the members of the Electronic Working Group (EWG) for their commendable efforts in developing this proposed draft. In this context, Egypt would like to submit the following comments:

Question 1 – Section 1: Preamble/Introduction

Should sub-paragraph "6 bis" be retained?

[6 bis. Fundamental to the successful functioning of any food fraud combatting strategy is the establishment and maintenance of an anti-food fraud culture acknowledging the importance of human behaviors in protecting integrity of the food supply chain and presenting food/feed in a manner so as not to deceive consumers.]

Position:

Egypt supports the deletion of sub-para "6 bis".

Rationale:

The paragraph is ambiguous because it mentions competent authorities, food business operators, and consumers, but it doesn't specify who is responsible for implementing the 'food fraud combatting strategy' and the 'anti-food fraud culture acknowledging the importance of human behaviors.'

Question 2 – Section 2: Purpose / Scope**In paragraph 7, should the addition of “that may impact human food safety” be retained?**

7. The purpose is to provide guidance to competent authorities and FBOs on the prevention, detection, mitigation, and control of food fraud to help protect the health of consumers, and to ensure fair practices in food trade, including feed for food producing animals [that may impact human food safety]. Aspects related to food fraud are already addressed through many existing Codex texts; this guidance is intended to support or supplement existing Codex texts by providing additional guidance specific to food fraud that can be considered within NFCS3.

Position:

Egypt supports the deletion of the addition of “that may impact human food safety”.

Rationale:

The phrase lacks consistency and harmonization among the clause “human food safety”. Additionally, it creates confusion in the flow of the proposed guidelines ‘human food safety’.

Question 4 – Section 2: Purpose / Scope**Should 7bis be retained?**

7bis. [the investigation and prosecution of food fraud offenses are outside the scope of this guideline and need to be handled by countries under their respective laws.]

Position:

Egypt supports that 7bis be retained.

Rationale:

It would be up to the Members to determine how to investigate and prosecute food fraud offenses within their own legal frameworks, taking into account their existing legal obligations and frameworks.

Question 6 – Section 6: Roles and Responsibilities**Commenters pointed out redundancies between sub-paragraphs ‘b. bis’ and ‘e’. Should one of the sub-paragraphs be deleted?**

b. bis [Have measures in place to mitigate the risk that the food products and ingredients are not authentic and ensure that the nature, safety, quality, and substance are accurately represented.]

Position:

Egypt proposes deleting 10b.bis

Rationale:

Egypt proposes deleting 10b.bis in square brackets, as it is sufficiently clear and comprehensive to encompass ‘b. bis.’ and already addressed in 10e.

Question 7 – Section 8: Cooperation, collaboration and exchange of information between competent authorities**A member of the EWG suggested the inclusion of Para. 15 ter. Should this new para. be included?**

15 ter. Enhance collaboration to better integrate neutral technologies and use of data mining and machine learning technologies in the food chain which can aid in more effectively preventing food fraud.

Position:

Egypt does not support the addition of 15 ter.

Rationale:

Specifying types of technology for information exchange is unnecessary, as collaboration is already addressed in paragraph 14.

