

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 10 (a)

CX/CAC 12/35/11

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

35th Session

Rome, Italy, 2-7 July 2012

STRATEGIC PLANNING OF THE CODEX ALIMENTARIUS COMMISSION

CODEX STRATEGIC PLAN 2008-2013 - GENERAL IMPLEMENTATION STATUS

1. The Thirtieth Session of the Commission adopted the Strategic Plan of the Codex Alimentarius Commission 2008-2013¹.
2. Part 3 of the Strategic Plan incorporates a check list that should be regularly updated for review by the Executive Committee and the Commission to monitor the implementation of the Strategic Plan.
3. The Commission is invited to review the checklist as presented in Annex 1 to this document, together with additional notes by the Secretariat contained in Annex 2, with a view to providing views and recommendations, where appropriate.

¹ Published in 2007 as ISSN 0259-2916.

Annex 1**IMPLEMENTATION OF STRATEGIC PLAN 2008-2013**

Goal 1: Promoting Sound Regulatory Frameworks							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
1.1 Review and develop Codex standards and related texts for food safety	CCFH, CCFA, CCCF, CCPR, CCRVDF, CCNFSDU, relevant Task Forces and Commodity Committees	Continuing	Standards related texts adopted at respective steps	Ongoing	<i>See CX/CAC 12/35/3 and CX/EXEC 12/67/2.</i>		
1.2 Review and develop Codex standards and related texts for food quality	Relevant Task Forces, Commodity Committees and FAO/WHO Coordinating Committees	Continuing	Standards and related texts adopted at respective steps	Ongoing	<i>See CX/CAC 12/35/3 and CX/EXEC 12/67/2.</i>		
1.3 Review and develop Codex standards and related texts for food labelling and nutrition	CCFL, CCNFSDU	Continuing	Standards and related texts adopted at respective steps	Ongoing	<i>See CX/CAC 12/35/3 and CX/EXEC 12/67/2.</i>		
1.4 Review and develop Codex standards and related texts for food inspection and certification, and methods of analysis and sampling	CCMAS, CCFICS	Continuing	Standards and related texts adopted at respective steps	Ongoing	<i>See CX/CAC 12/35/3 and CX/EXEC 12/67/2.</i>		

Goal 1: Promoting Sound Regulatory Frameworks							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
1.5 Develop guidance for safe and prudent non-human antimicrobial usage for containment of resistance	Existing relevant Codex Committees, <i>ad hoc</i> Intergovernmental Task Force on Antimicrobial Resistance	Completion by 2011	Guidance for safe and prudent non-human antimicrobial usage for containment of resistance	Completed	<i>Guidelines for Risk Analysis of Foodborne Antimicrobial Resistance (CAC/GL 77-2011), adopted by the 34th CAC.</i>		
1.6 Explore innovative risk management frameworks	CCRVDF, CCPR	Completion by 2009	Reports by CCRVDF and CCPR respectively to CCEXEC and CAC	Ongoing	<p><u>CCRVDF</u>: completed work on the revision of the <i>Risk Analysis Principles applied by the CCRVDF</i> and the renamed <i>Risk Assessment Policy for Residues of Veterinary Drugs in Foods</i>. Work is ongoing on the development of concern forms for use by the Committee (<i>See Note</i>).</p> <p><u>CCPR</u>: Revision of the <i>Risk Analysis Principles applied by the CCPR</i> (Approaches to the Periodic Review Procedure <i>including submission of concern forms and other forms</i>).</p> <p>Pilot project for JMPR recommendation of MRLs before national governments or other regional registration authorities for a global joint review chemical (<i>See Note</i>).</p>		

Goal 1: Promoting Sound Regulatory Frameworks							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
1.7 Encourage FAO/WHO to expand capacity building programmes	CAC, CCEXEC and FAO/WHO Coordinating Committees	Continuing	Report from FAO/WHO to CAC, CCEXEC and Coordinating Committees	Ongoing	<i>See CX/CAC 12/35/14.</i>		
1.8 Publish and disseminate the Codex Alimentarius	Codex Secretariat, Codex Contact Points	Continuing	Publication and dissemination of Codex Alimentarius	Ongoing	<i>See Note.</i>		

Goal 2: Promoting Widest and Consistent Application of Scientific Principles and Risk Analysis							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
2.1 Review the consistency of risk analysis principles elaborated by the relevant Codex Committees	CCGP	Completion by 2011	Report by CCGP of completed review to CAC.	Completed			
2.2 Review risk analysis principles developed by relevant Codex Committees	CAC, CCEXEC, CCFA, CCCF, CCPR, CCRVDF, CCFH, CCNFSU	Completion by 2013	Report by relevant Committees of completed review, taking into account the review of the activities in 2.1 and 2.3.	Ongoing Initiated at the 26 th CCGP (2010)	<p><u>CCFA</u> finalized <i>Risk Analysis Principles Applied by the CCFA</i>.</p> <p><u>CCRVDF</u> finalized revision of the <i>Risk Analysis Principles applied by the CCRVDF</i> and the <i>Risk Assessment Policy for Residues of Veterinary Drugs</i>” (see Activity 1.6).</p> <p><u>CCPR</u>: ongoing work on the revision of the <i>Risk Analysis Principles applied by the CCPR</i> (see Activity 1.6).</p> <p><u>CCCF</u> finalized <i>Risk Analysis Principles applied by the CCCF</i>, including their applicability to feed.</p> <p><u>CCFH</u> revised its risk analysis principles and procedures (See Note).</p>		

Goal 2: Promoting Widest and Consistent Application of Scientific Principles and Risk Analysis							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
2.3 Enhance communication among relevant Codex subsidiary bodies and the FAO/WHO scientific expert bodies	CCFA, CCCF, CCPR, CCRVDF, CCFH, CCFNSDU	Ongoing	Incorporated into report as required in 2.2.	Ongoing	<i>See CX/CAC 12/35/14.</i>		
2.4 Review the set of criteria recommended to FAO and WHO for prioritization of requests from Codex for scientific advice.	CCEXEC	Completion by 2009	Report of review by CCEXEC to CAC, with recommendation to better match priorities and resources	Completed			
2.5 Encourage countries to channel their requests for scientific advice to FAO / WHO through the CAC	CAC, CCEXEC, all subsidiary bodies	Continuing	Reports by FAO and WHO of requests for scientific advice received directly from countries vs. requests received through CAC.	Ongoing	<i>See CX/CAC 12/35/14.</i> <i>See Note.</i>		
2.6 Encourage FAO/WHO to provide training and capacity building on risk analysis for food safety	CAC, CCEXEC, FAO/WHO Coordinating Committees and Codex Members	Continuing	Report from FAO/WHO to CAC, CCEXEC and Coordinating Committees	Ongoing	<i>See CX/CAC 12/35/14</i>		

Goal 3: Strengthening Codex Work-Management Capabilities							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
3.1 Review the Criteria for the Establishment of Work Priorities and procedures of the critical review carried out by the CCEXEC	CCEXEC, CCGP	Completion by 2009 Completion by 2011	Report by CCEXEC on analysis of the critical review process If there is need for revision, revise the Criteria for the Establishment of Work Priorities by CCGP	Completed			
3.2 Ensure effective standards management	CCEXEC	Continuing	Report on compliance of standards development against timelines (associated with critical review process)	Ongoing	<i>See CX/EXEC 12/66/2 and CX/EXEC 12/67/2 (critical review)</i>		
3.3 Develop committee-specific decision making and priority setting criteria	All General Subject Committees and some other subsidiary bodies as appropriate	Completion of criteria by 2008 Review of criteria starting in 2008	Committee-specific decision-making and priority-setting criteria Confirmed review of criteria beginning in 2008	Completed Decision making criteria CCFH, CCFA, CCCF, CCPR, CCMMP, CCMAS, CCRVDF Priority setting criteria CCFH, CCFA, CCCF, CCRVDF, CCPR, CCMMP			

Goal 3: Strengthening Codex Work-Management Capabilities							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
3.4 Analyse work-management approaches that facilitate advancement of texts in the Codex step process	Either by Codex Secretariat or by consultant for next step (3.5)	Completion by 2009	Report to the CCEXEC and CAC on analysis of work-management approaches	Completed.			
3.5 Adopt approaches proven to facilitate advancement of texts in the Codex step procedure by subsidiary bodies not currently using such approaches	CCEXEC and CAC	Completion by 2011	Adoption by CAC of work - management approaches.	Ongoing	CCEXEC recommendations and comments on practices on work managements approaches (ALINORM 10/33/3A, paras 66-114) presented at relevant committees. <i>See Note.</i>		
3.6 Implement priority-ranked comprehensive accounting of all requests for scientific advice	CCEXEC, CAC, FAO and WHO	Continuing	Comprehensive report by FAO/WHO to CAC on accounting of all requests for scientific advice	Ongoing	<i>See CX/CAC 12/35/14.</i>		
3.7 Evaluate the capacity of the Codex Secretariat to perform its function effectively	Codex Secretariat, CCEXEC, CAC	Completion by 2009	Report by Secretariat to CAC on the staff and other key resources	Completed			

Goal 3: Strengthening Codex Work-Management Capabilities							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
3.8 Streamline Codex Commodity work	CCEXEC, CAC	Completion by 2010	Implementation of the decisions of the Commission on how to streamline Codex work on commodities through an improved structure of Codex subsidiary bodies	Completed			CAC 32 decided to discontinue discussion on this subject.

Goal 4: Promoting Cooperation between Codex and other relevant international organizations							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
4.1 Track the activities of other international standard-setting bodies	CAC, CCEXEC, Codex Secretariat, subsidiary bodies	Continuing	Report to the CCEXEC and CAC indicating potential complementarities, gaps, duplication, or conflict with the work of other international organizations	Ongoing	<i>See CX/CAC 12/35/16. See Note.</i>		
4.2 Encourage Codex contributions to the work of other international bodies	Codex Secretariat	Continuing	Number of standards elaborated by other international organisations with a cross reference to Codex standards and relevant texts	Ongoing	<i>See CX/CAC 12/35/16.</i>		

Goal 4: Promoting Cooperation between Codex and other relevant international organizations							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
4.3 Encourage contributions from other international bodies in Codex work	Observers, Codex Secretariat	Continuing	Number of Codex standards elaborated with identifiable input from other international organisations	Ongoing	<i>See CX/CAC 12/35/16.</i>		
4.4 Consider cooperation with other relevant international intergovernmental organizations	Legal Counsels of FAO and WHO, Codex Secretariat	Continuing	Devise the means by which Codex can strengthen cooperation with OIE and IPPC	Ongoing	<i>See Note.</i>		
4.5 Promote interdisciplinary coordination at the national and regional level	Codex Members, FAO/WHO Coordinating Committees	Completion by 2009	Reports from members to Regional Coordinating Committees on mechanisms and evaluation criteria.	Completed			

Goal 5: Promoting Maximum and Effective Participation of Members							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
5.1 Promote enhanced participation of developing countries in Codex	CAC, CCEXEC	Continuing	Reports from FAO / WHO presenting analysis of measures of enhanced participation achieved through the Codex Trust Fund.	Ongoing	<i>See CX/CAC 12/35/13.</i> Next cycle 2012-2013 of coordinating committees will receive information on the Codex Trust Fund Monitoring and Evaluation Framework.		
5.2 Promote effective use of written comments in the Codex process	Codex Members, Observers, CCEXEC, Codex Secretariat	Continuing	Reports by host countries on patterns of submission of written comments in response to CLs, and adherence by chairs to the guidelines for the conduct of the meetings.		The Codex Secretariat sent a questionnaire to Chairs and host country secretariats. <i>See Annex 3 (questionnaire and replies received)</i>		
5.3 Evaluate effectiveness of Codex Committee sessions held in developing countries	Host countries, CCEXEC	Completion by 2009	Reports from host and co-hosting countries documenting experience co-hosting experience.	Completed			
5.4 Strengthen Codex Contact Points and National Codex Committees	CAC, CCEXEC, Codex Secretariat	Continuing	Reports from FAO/WHO on countries whose National structure and Codex Contact Points have been supported.	Ongoing	Reports of coordinating committees to be held in 2012/2013.		

Goal 5: Promoting Maximum and Effective Participation of Members							
Activities	Responsible parties	Timeframe	Output/Measurable indicators	Current Status	Notes	Advice by EXEC	Decision by CAC
5.5 Enhance participation of non-governmental organizations at international, regional and national levels	CAC, Codex Members, subsidiary bodies	Continuing	Reports from member countries under relevant agenda items of the Regional Committees, on participations of non-governmental organizations at National level.	Ongoing	Reports of coordinating committees to be held in 2012/2013.		
5.6 Enhance communication about Codex work at international and national levels	Codex Secretariat, WHO and FAO, Codex Contact Points, subsidiary bodies	Continuing	Reports by Secretariat to CAC on increased use of audio/ webcasting, enhancement of webpages, increase use of electronic distribution of Codex materials, etc.	Continuing	<i>See Note.</i>		

Annex 2**Notes by the Secretariat****Goal 1: Promoting Sound Regulatory Frameworks**

Activities 1.1 through 1.5 are ongoing activities that constitute the core business of the Commission. They are regularly monitored through the Critical Review undertaken by the Executive Committee.

Activity 1.6 specifically addresses issues on exploring appropriate risk management frameworks to be applied in developing maximum residue limits (MRLs) of veterinary drugs and pesticides by the Committees on Residues of Veterinary Drugs in Foods (CCRVDF) and on Pesticide Residues (CCPR) respectively.

Residues of Veterinary Drugs in Foods

The Committee has finalised the revision of the *Risk Analysis Principles Applied by the CCRVDF* and the renamed *Risk Assessment Policy for Residues of Veterinary Drugs in Foods*, which has been forwarded to the 35th Session of the Commission for adoption (REP12/RVDF, para. 83 and Appendix VII). The revision has in particular focused on the revision of Section 3.2 ‘Evaluation of risk management options’ in order to provide JECFA with specific directions, together with their rationale, on how to generate and submit for consideration by the Committee a range of acceptable values for each MRL to be established; and on the development of risk management and risk communication recommendations for veterinary drugs for which no ADI or MRL have been recommended by JECFA either due to specific human health concerns or a lack of information.

The Committee has also agreed to continue work on the “concern form” and to develop the scope of the “concern form”, the procedure policy for its use and its format, for consideration by the next Session. In developing this work, the Committee will take into account the work of CCPR and the the CCGP on standards held at Step 8 (REP12/RVDF, paras 80-81).

With regard to veterinary drugs with no ADI and/or MRLs due to specific human health concern, the Committee to forward a project document to the 35th Session of the Commission for approval as a new work on the development of risk management recommendations for the following veterinary drugs: carbadox, chloramphenicol, chlorpromazine, malachite green, two nitrofurans, four nitroimidazoles, olaquinox and stilbenes (REP12/RVDF, paras 134 and Appendix X).

Pesticide Residues

The Committee continues the revision of the *Risk Analysis Principles Applied by the Codex Committee on Pesticide Residues* with focus on the Periodic Review Procedure and the submission of concern form / other forms (REP12/PR, para. 163 and Appendix XIV).

The Committee agreed to retain all MRLs evaluated by the 2011 JMPR under the pilot project for JMPR recommendation of MRLs before national governments or other regional registration authorities for a global joint review chemical awaiting the outcome of the national global joint review in 2013 (REP12/PR, para. 94 and Appendix VII).

Activity 1.7 is an ongoing activity. FAO and WHO capacity building activities are presented in CX/CAC 12/35/14. These activities are also considered regularly by FAO/WHO Coordinating Committees.

Activity 1.8 is being implemented by the Codex Secretariat on an ongoing basis, including through the Codex website. All Codex Contact Points play an important role in effective distribution and dissemination of the Codex Alimentarius at the national level.

Updated Codex standards and related texts (following the 34th CAC) were published on the Codex website and the new CD ROM will be available at the Commission. Several new special publications by thematic area are in preparation.

A project on updating and translating Codex standards into Arabic and Russian is ongoing and standards are published on the Codex website as they get translated. Chinese translation continues in cooperation with the China CCP.

The Codex website allows an easy overview over the availability of texts in different languages and also the user interface of the page itself exists now in all official languages with some parts still under preparation.

Goal 2: Promoting Widest and Consistent Application of Scientific Principles and Risk Analysis

Activity 2.2

This activity started with the consideration by the Committees concerned of the review of risk analysis principles, which was presented at the 26th Session of the Committee on General Principles (2010).

Committee on Food Additives

The Committee agreed to forward the proposed revised *Risk Analysis Principles Applied by the Codex Committee on Food Additives* to the Codex Alimentarius Commission for adoption and inclusion in the Procedural Manual (REP12/FA para. 22, Appendix II). The Committee on General Principles endorsed the revised Risk Analysis Principles as proposed by the CCCF (REP12/GP, para. 49)

Committee on Contaminants in Foods

The Committee agreed to forward the proposed revised *Risk Analysis Principles Applied by the Codex Committee on Contaminants in Foods* to the Codex Alimentarius Commission for adoption and inclusion in the Procedural Manual (REP12/CF para. 12, Appendix II). The Committee on General Principles endorsed the revised Risk Analysis Principles as proposed by the CCCF (REP12/GP, para. 49)

Committee on Food Hygiene

The Committee revised its risk analysis principles and procedures in order to simplify its principles and procedures in line with Activity 2.2 and taking into account the recommendations in CL 2010/1-GP (REP12/FH, para.129).

Committee on Pesticide Residues

(see Activity 1.6).

Committee on Residues of Veterinary Drugs in Foods

(see Activity 1.6).

Activity 2.5 is ongoing. Document CX/CAC 12/35/14 provides a list of requests for scientific advice addressed to FAO and WHO. All requests for scientific advice directly related to Codex work in 2011-2012 originated from Codex subsidiary bodies. Some other expert meetings not directly related to Codex work were organised by FAO/WHO.

Activity 2.6 is ongoing. FAO and WHO capacity building activities on risk analysis presented in CX/CAC 12/35/14. These activities are also considered regularly by FAO/WHO Coordinating Committees.

Goal 3: Strengthening Codex Work-Management Capabilities

Activity 3.5 is ongoing. The 64th CCEXEC recommendations and comments on practices on work managements approaches (ALINORM 10/33/3A, paras 66-114) were presented at relevant Committees. At present, further work on this matter in CCPR and CCRVDF within the ongoing revision of their Risk Analysis Principles and the CCPR pilot project for JMPR (see Activity 1.6).

CCGP is considering the issues related to standards held at Step 8. At its 27th Session, the Committee agreed to hold a facilitated discussion group to identify and consider the root causes for holding standards at Step 8 with the purpose to enhance awareness and understanding of these issues amongst members (REP12/GP, paras 10-32).

Goal 4: Promoting Cooperation between Codex and other relevant international organizations

General Note: Following the request of the 63rd CCEXEC, the information in document CX/CAC 12/35/16 will be presented to follow Activities 4.1 to 4.3.

Activity 4.1 is implemented through the consideration of a working paper (CX/CAC 12/35/11) and several information documents at the Commission. The information on the work of OIE, WTO, IAEA and ISO is presented at each session of the Commission, while the information on the work of other international organizations is presented to the Commission when relevant.

Activity 4.2 is implemented through the participation of the Codex Secretariat in relevant meetings of other international standards setting organizations either regularly or as required for subjects of specific interest, or through written contribution, mainly to draw the attention of other organizations to existing standards or ongoing Codex work.

Activity 4.4 The *Guidelines on Cooperation between the Codex Alimentarius Commission and International Intergovernmental Organizations in the Elaboration of Standards and Related Texts* provide the framework for cooperation with IGOs. Information on the cooperation with OIE and IPPC will be provided at the Commission.

Goal 5: Promoting Maximum and Effective Participation of Members

Activity 5.1 is an ongoing activity. The FAO/WHO Trust Fund report is presented in CX/CAC 12/35/13.

Activity 5.4: Update on this activity will be considered in the sessions of the FAO/WHO Coordinating Committees to be held in 2012-2013. This Activity is supported by Activity 5.6.

Activity 5.5: Update will be considered in the sessions of the FAO/WHO Coordinating Committees to be held in 2012-2013.

Activity 5.6: Many host governments now rely on the efficient distribution of working documents by the Codex Secretariat and have discontinued making hard copies available at the sessions. The same policy has been followed at the CAC. Audio-recording continues to be used for the CCEXEC and the CAC. The new website (www.codexalimentarius.org) offers an easier access to interested people from the general public to get an overview of Codex work. The Secretariat newsletter has been distributed since 2009 at irregular intervals. Based on the results of a survey on the contents and regularity of newsletter the secretariat will adapt it to better serve the expressed needs of members and observers. A similar survey on the use made of publications is under preparation

Annex 3**MONITORING OF THE IMPLEMENTATION OF ACTIVITY 5.2 OF THE CODEX STRATEGIC PLAN 2008-2013****1. Background**

1.1 Goal 5, of the Codex Strategic Plan 2008-2013: Promoting maximum and effective participation of members; activity 5.2: Promote effective use of written comments in the Codex process

Activity 5.2: Encourage members and observers to make maximum use of opportunities to submit written comments in response to Circular Letters (CLs) while respecting the deadlines for such submissions to allow all members and observers to study the positions of other members and observers in a timely manner.

Codex Secretariat and Chairs of the Committees will examine how best to ensure that written comments of members that are not present at the meetings are taken into consideration, and how to handle the late submission of comments in response to CLs, from the view points of transparency and inclusiveness.

Timeline: Continuing

Responsible parties: Codex Members, Observers, CCEXEC, Codex Secretariat

Monitoring: Reports by host countries on patterns of submission of written comments in response to CLs, and adherence by chairs to the guidelines for the conduct of the meetings

1.2 Provision contained in the Codex Procedural Manual Guidelines to Chairpersons of Codex Committees and Ad Hoc Intergovernmental Task Forces

“Chairpersons should also ensure that the written comments, received in a timely manner, of members and observers not present at the session are considered by the Committee and that all issues are put clearly to the Committee. This can usually best be done by stating what appears to be the generally acceptable view and asking delegates whether they have any objection to its being adopted.”

2. Questionnaire sent to Chairpersons and host country secretariats (March 2011)**QUESTIONS ON USING WRITTEN COMMENTS**

(To Chairpersons and host-countries to Codex Committees and Task Forces)

(1) How frequently are comments sent to your committee by delegations that then do not participate physically in the meeting?

(2) Do these comments usually arrive on time to be included in official working documents or in CRDs?

(3) How are these comments brought to the attention of the other delegations during the session?

3. Replies received

(1) How frequently are comments sent to your committee by delegations that then do not participate physically in the meeting?

AUSTRALIA (CCFICS)

In general our experience is that it is only one or two members that submit comments that do not/are unable to participate in the meeting. In our view what can be more problematic is when members submit comments to the Commission when a standard is ready for adoption at Step 5/8 and 8. In many instances the member may not have raised them at the Committee level; raised them at the Committee and the Committee has considered but not agreed to them or the member has not participated in the work. The approach to how these comments are managed at the Commission level appears to be *ad hoc* in that there is no guidance to Chairs as to whether they should arrange to meet with the delegation and try to resolve the issues prior to the plenary. In the case of CCFICS, the Chair seeks out the delegation at the Commission and tries to resolve the issue in a short time before the item comes up for adoption. If there are moves to develop procedures for handling of written comments this should include some guidance for consistency in respect of comments at the Commission.

CANADA (CCFL)

Every year there are always some countries that submit written comments then do not physically participate in the meeting. On average the number is relatively low (2 or 3) but there have been the odd instance where the number was higher (over 10) but those instances were usually a reflection of some international event that negatively impacted international travel (e.g. SARS).

GERMANY (CCNFSDU)

The evaluation of the last two CCNFSDU meetings shows the following: We received 10 comments of 7 member states that did not participate physically in the meetings.

MALAYSIA (CCFO)

Not many comments were sent to CCFO by delegations who subsequently did not participate physically in the meeting. At the 21st CCFO (February 2009), only 1 Member country (Mali) submitted its written comments. The session was attended by participants from 37 Member countries, one Member organisation and 5 international organisations.

While at the 22nd CCFO (February 2011), comments were received from 4 Member countries (Kenya, Mali, Mauritius and Mexico) who did not participate in the meeting. The session was attended by participants from 31 Member countries, one Member organisation and 9 international organisations.

MEXICO (CCFFV)

Delegations often send their comments even when they are not attending the meeting. They have explained that, even though, they reviewed the working papers and comment them, at the last minute they could not attend the meeting because of budgetary restrictions.

NETHERLANDS (CCCF)

Not much. Of the countries that provided Addendums to agenda items for the last CCCF meeting, only two did not participate in the meeting. Of the countries that provided CRDs only one did not participate.

UNITED STATES OF AMERICA (CCFH, CCPFV, CCRVDF)

While the vast majority of comments are submitted by developed countries who attend the meetings, there are instances in which comments are submitted by Member Countries which are not physically present at the committee meeting. While this situation may apply to only one or two Member Countries, it does usually occur each time one of the three U.S.-hosted committees (CCFH, CCPFV, and CCRVDF) meets. Generally, these comments are from developing countries which don't have the funding to send their delegates to the meeting.

Our greater problem is that we do not hear any comments from the majority of participating countries. Relatively speaking only a few countries submit written comments prior to the meeting. Some of our chairs are working to encourage, particularly developing countries, toward greater participation in Codex meetings, and one way we believe this can be accomplished is through participation in working groups and submission of written comments. In some instances, the Codex Contact Point (CCP) has not distributed a Working Group document, and we are encouraging the CCP to do so, even if they do not plan on commenting, as at least it will familiarize their delegates with the discussion and direction of the document.

We do share the concerns raised by Australia regarding the submission of comments to the Commission for standards that are up for adoption at Steps 5 and 5/8. Most countries do not send delegates to the Commission who have the technical expertise to address the comments, nor does the Commission have the time to devote to a discussion of the comments. Therefore, it is the practice of the U.S. Codex Office to refer these comments to the chair of the respective committee and ask the chair to contact the member country that submitted them to discuss their concerns, and hopefully resolve them prior to the Commission.

We agree that frequently these comments are submitted by a member country that did not fully participate in the committee meeting, and therefore may be unaware that the issues raised in their comments received careful consideration by the committee. In such cases, if the chair is not able to resolve the member country's concerns prior to the Commission, we ask the chair to advise the Commission that these issues were discussed in depth by the committee and the current document up for adoption was achieved by consensus.

(2) Do these comments usually arrive on time to be included in official working documents or in CRDs?

AUSTRALIA (CCFICS)

It is probably a mixture of both comments arriving on time and late. In general we allow up to 5 working days after the due date for including comments in the official working papers and translation. Where comments arrive later than this the Australian secretariat notifies the member concerned that the comments will be provided to the committee in the original language only and whether the comments will be contained in an Add 2 or a CRD. Presentation of country positions to the secretariat at the beginning of the meeting should also be discouraged.

CANADA (CCFL)

In some instances, the comments are received in time to be included in the official working documents (i.e. add. papers). However, there is an increasing number of instances where the comments are reproduced as CRDs because they were received too late to be included in the "add" papers. This may be due to countries planning to attend changing their plans due to difficulties in obtaining visas, thus comments are submitted late. Another growing trend is that countries that are present will not submit any comments in response to CLs or CX papers but instead will submit their comments upon arrival at the meeting with a request that a CRD be prepared with a compilation of all their comments. This creates additional work for the host country secretariat at a time when resources are already spread very thin.

GERMANY (CCNFSDU)

We received 4 of these 10 comments after the deadline mentioned in the relevant reference documents. We could include 2 of these belated comments in the official working documents (original language only). As there wasn't enough time to prepare translations, they could, however, not be included in the French and/or Spanish official working documents in time.

2 belated comments could be included in CRDs.

MALAYSIA (CCFO)

Comments were generally received within 1 to 2 weeks before the session. Some were however very last minute, being only 1 or 2 days before the session. Therefore, these were produced as CRDs.

MEXICO (CCFFV)

Few comments are received on time; often they are received after the deadline. In the particular case of CCFFV, most of the comments are circulated as CRD's, because they usually arrive two days before of the meeting.

NETHERLANDS (CCCF)

There are deadlines for providing Addendums and CRDs. All written comments arrived in time.

UNITED STATES (CCFH, CCPFV, CCRVDF)

Yes, comments that are submitted by countries that do not attend the meeting, are typically received in time to be included in a comment document (Add). The United States tries to ensure that all comments are translated and circulated before the meeting, and thus, we frequently issue two addendums containing comments. However, there are times, when comments are received too late (less than a week prior to the meeting) to be translated and circulated before the meeting. In most cases, CRDs are presented by countries attending the meeting, but whether or not the countries are physically present at the committee meetings, if their comments are not received in time to be included in an addendum, they will be issued as a CRD, and in almost cases, original language only.

(3) How are these comments brought to the attention of the other delegations during the session?

AUSTRALIA (CCFICS)

In respect of CCFICS, at the beginning of each item, the Chair person advises the committee of the documents pertaining to that particular item, this list includes the CX's, Add documents and any CRDS. The Australian secretariat also provides delegates with a matrix that indicates member comments that have been received for each item and what document they can be found in. Where possible we also draw the committee's attention to specific comments during the discussion – this is usually done with the assistance of the Codex Secretariat. To assist the Chair with managing members comments the Australian secretariat also prepares a document that shows paragraph by paragraph individual member comments against the original text. On some occasions delegations may refer to another members comments as well.

CANADA (CCFL)

All comments received are brought to the attention of the delegates present. A set of chair's annotated notes are prepared for each agenda item being considered during the committee session and countries that have submitted comments but are not present are indicated in the notes. The chair will draw attention of delegates to those comments. In addition, the Canadian secretariat will review the comments submitted and if points are raised in those comments that are different from other comments or that may offer a compromise the chair will specifically draw upon those texts. References, including those to comments from members not present, are projected on a screen on both sides of the head table.

Additional remarks:

As you are aware, we do try to ensure comments from countries not present are made known to the delegates. When we prepare the Chairs annotated agenda, we ensure that where there are comments from members (and observers) not present at the session, these are highlighted so he is aware of their existence.

With regards to submission of comments, I would like to draw two points (trends?) to your attention. As a rule, countries that prepare written comments and then don't physically participate are often those that leave visa applications until the last minute. Even though people know a number of months when and where the meeting will occur, there have been situations where they have approached our embassy the week before the meeting expecting to obtain a visa. This year we had over a dozen "urgent" calls from potential delegates asking us to intervene and speed up the process; something, of course, that we are unable to do.

The other trend is that there appears to be an increase in the number of countries showing up with their national positions and asking that we prepare a CRD. We've noted that some of those positions include replies to CLs where they appear to have not submitted a reply, preferring instead to approach us and request (in the odd instance, demand) a CRD. This puts an additional burden on our staff here at a time when they are already stretched to the limit.

GERMANY (CCNFSDU)

Comments not arriving in time or after the beginning of the meeting are immediately included in CRDs and displayed as hard copies. At the beginning of the discussion of the relevant item, the chairperson informs the participants about the presence of CRDs/comments.

MALAYSIA (CCFO)

These comments were read by the Chairperson of CCFO in the plenary, when discussing the pertinent issues. The Chair is mindful of the need to ensure that the written comments of members that are not present physically at meetings be taken into consideration. By reading out or highlighting these comments by the Chair, it is felt that these comments can contribute to the deliberations thereby making effective use of the written comments.

It should be noted that the Chair of CCFO was able to read out these written comments because in the recently concluded 22nd Session, except for one country, the comments were all submitted in English. The Chair was not able to read out the comment submitted by Mali as it was only available in French. In view of the latter, members that are not able to participate in the meeting should be encouraged to submit their comments in English in addition to the original language.

Additionally, the Codex Secretariat could assist in managing countries comments by bringing to the Chairperson's attention all comments received from countries that are not able to participate in the meeting so that their views could be considered by the Committee.

MEXICO (CCFFV)

When the comments are circulated like CDR's, other delegations do not have enough time to study and take them as an argument or strengthening their own national positions.

General comment:

As CCFFV secretariat, it is important to developed mechanisms that facilitate members making comments to the drafts standards and working documents, which will allow the Secretariat to identify them and incorporate them to the commentary documents in an easier way. This would also diminish the translation costs.

NETHERLANDS (CCCF)

None. Comments of non-participants are only used in the preparation (when it concerns Addendums). CRDs will only be discussed when they are being put forward by the delegation in the meeting.

UNITED STATES (CCFH, CCPFV, CCRVDF)

There are several ways in which the written comments of non-attending members are brought to the attention of the committee. Frequently, the chair or the leader of the working group will make reference to the comments submitted when introducing the agenda item. In CCFH particularly, often, there are regional committee meetings before a meeting and a non attending member makes arrangements with another member to reference that country's comments in a position put forward by an attending delegation. Additionally, in preparation for each meeting, the chair and supporting staff meet with regional committees. During these informal discussions, the comments from specific countries that are not present during plenary, are brought to the chair's attention.

At times, the Secretariat reminds the chair and/or the committee of comments submitted by member who aren't present so delegations can read and consult during the plenary discussion. Also during the seminar hosted by the chair for the first time delegates, the chair counsels the delegates to read the documents, including the comments, in advance of the discussions.

In the CCPFV, decisions taken by the Committee are based on consensus of those in attendance; however, if a significant number of non-attending delegations submitted comments which presented contrary views, there likely would be acknowledgment of this in the discussion of the item.

In CCRVDF, electronic working groups are conducted between sessions and/or scheduled working group meetings just before the plenary. All comments are shared in the course of work within the working groups. The chairs of the working groups report out their conclusions as well as any major issues noted by delegations.