

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 7

CX/GP 23/33/7
September 2023

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

Thirty-third Session

Bordeaux, France

2-6 October 2023

REVIEW AND POSSIBLE AMENDMENT OF THE PRINCIPLES CONCERNING THE PARTICIPATION OF INTERNATIONAL NON-GOVERNMENTAL ORGANIZATIONS IN THE WORK OF THE CODEX ALIMENTARIUS COMMISSION

(Prepared by the Codex Secretariat in collaboration with the Legal Offices of FAO and WHO)

Background and Introduction

1. Following consideration of the document *Review of International Non-Governmental Organizations with Observer Status*¹ (the "Review"), the 83rd Session of the Executive Committee of the Codex Alimentarius Commission (CCEXEC83) requested the Codex Secretariat to present a further review on the criteria included in the *Principles Concerning the Participation of International Non-Governmental Organizations in the Work of the Codex Alimentarius Commission* (the "Principles"), at the forthcoming session of CCGP (CCGP33), to evaluate amendments to the *Review of Observer Status* contained in the Principles, "*which might recognize as part of the regular review the contributions Observers may make to advancing the objectives of Codex other than through their participation in Codex standard setting activities*".
2. For a detailed analysis, including references to relevant documents and previous discussions, reference is made to documents CX/EXEC 22/82/7 and CX/EXEC 22/83/6. The purpose of this paper is to provide an overview of the different ways by which NGOs with Observer Status with Codex currently promote and contribute to Codex work and to address whether the *Review of Observer Status* contained in the Principles should be amended to reflect such contributions.

Other modalities by which NGOs with Observer Status promote and contribute to Codex work

3. As new means of communication have emerged in recent years, NGOs have had the opportunity to promote Codex work and standards in new and additional ways. The analysis carried out by the Codex Secretariat following the request by CCEXEC83 included the results from the 2022 Review², the information provided directly by NGO Observers via, e.g., news published on the Codex website, social media analysis, webinars and relevant publications produced by NGO Observers. To have a comprehensive understanding of the *status quo* and to receive detailed information on other modalities of contribution and promotion, the Codex Secretariat also sent all NGOs with Observer Status the survey included in Annex I. As of 1 September 2023, 52 of the 159 NGOs with Observer Status (32 percent) had replied to the survey.
4. The results of the survey, which are contained in Annex II, showed that Observers promote Codex work in ways that go beyond attendance at meetings or provision of written comments.

Webinars, workshops and side events

5. One modality not currently included in the Codex Procedural Manual by which NGOs contribute to Codex and its work is by organizing meetings on Codex-related activities. (29% of the NGOs replying to the survey). These meetings generally focus on a wide range of Codex issues – e.g. on its objectives and related mechanisms

¹ CX/EXEC 22/83/6.

² CX/EXEC 22/82/7

such as the Step Procedure³ and/or the different Committees and their work – but also on topics of particular relevance to the Observers, like nutrition or pesticides.

6. 11 NGOs also held webinars or workshops immediately prior to Codex Committees in order to inform and discuss with participants - Codex Members, other Observers and/or the general public - their agendas and related documents.
7. Nineteen NGOs also prepared and led side events at the margins of Codex Committees – either General, Commodity or Regional – to inform and share data and proposals on current and future work of the Commission and its subsidiary bodies. These events reached a broader Codex audience.

Brochures and publications

8. Based on the results of the survey, only two NGOs with Observer Status with Codex produced brochures and publications related to Codex work, which relate to, e.g., raising awareness of Codex and its standards, the use of standards by the industry and consumers, or specific related matters such as food additives or veterinary drugs residues in food.

Social Media

9. The 2022 Review also mentioned social media among the means of promoting Codex work: for example, APIMONDIA did not take part in the formal Codex governance meetings between 2016 and 2021, by either sending documents, comments and/or attending Codex meetings, but actively promoted Codex work through its Twitter/X handle, by publishing ad hoc posts e.g. on the Codex Alimentarius Commission and its work as well as Codex standards, and by participating in Codex-organised events such as those scheduled for World Food Safety Day (Twitter chats, posts et al). Recognizing APIMONDIA's promotion to Codex work via these means, CCEXEC82 agreed that APIMONDIA could maintain Observer Status with Codex⁴.
10. At least 60 NGOs with Observer Status⁵ undertake such activities. Many of these NGOs actively participate in Codex (e.g. by sending comments and/or attending a session of a Codex Committee) while at the same time producing web and social media content (e.g. messages, photos, infographics, videos) on the work of Codex and on its importance.

Contributing to the Codex Strategic Plan 2020-2025 (Strategic Plan)

11. As highlighted in CX/EXEC 22/83/6, these new ways to promote the goals of Codex, are consistent with the obligations of NGOs with Observer Status under the Principles, particularly paragraph 5.2 (c), and also with Goal 3 of the Strategic Plan, *Increase impact through the recognition and use of Codex standards*, more precisely, with Goal 3.1, *Raise the awareness of Codex standards*.
12. Raising awareness and promotion of the use of Codex standards is the responsibility of all Members and Observers of Codex. Observers also contribute to this goal with the above-mentioned activities which have also been shared with the Codex Secretariat and the broader Codex audience on Codex regional, observer and World Food Safety Day (WFSD) webpages. In particular, in 2023, as the theme for WFSD focused on food standards under the slogan "Food standards save lives", eight NGOs with Observer Status organized ad hoc events, webinars and social media products to promote the day and the contribution of Codex standards in this context.

Conclusion

13. Means of promoting Codex beyond traditional attendance at meetings or submission of official documents/comments are currently not formally considered when reviewing observer status. It is important for the success of Codex that information about its work reaches and is applied by stakeholders, and that in turn information from stakeholders reaches Codex. The promotional activities by NGOs with Observer Status on new media have the potential to reach a broader audience than traditional participation. The survey showed that 80% of the NGOs that responded to the survey are currently promoting the work of Codex via webinars, social media, publications and guidance documents on Codex and use of Codex standards.
14. In light of the above, consideration could be given to also take these promotional activities into account when assessing whether NGOs continue to express sufficient interest in Codex to maintain their Observer Status.

³ Procedural Manual, Section II, Elaboration of Codex standards and related texts

⁴ REP22/EXEC1, para. 113

⁵ Results based on the activity of NGOs with Observer Status with a Twitter handle.

15. To take these promotional activities into account for these purposes would require the amendment of the Section "Review of 'Observer Status'" of the Principles. Bearing in mind the purpose of collaboration with NGOs with Observer Status as stated in paragraph 1 of the Principles⁶ - which is mainly to benefit the Codex Alimentarius Commission and its subsidiary bodies with advice and information - promotional activities would not seem to represent the activities at the core of Observer status with Codex. Nevertheless, such activities may indicate that the organization continue to contribute to the work of Codex in accordance with paragraph 27(c) of Section VII of the Codex Procedural Manual, which states that an organization with Observer Status shall also "*contribute, as far as possible, and at the request of the Directors-General, to the promotion of a better knowledge and understanding of the CAC and the Joint FAO/WHO Food Standards Programme through appropriate discussions or other forms of publicity*".
16. While not recommending a change to the Principles at this time, the Codex Secretariat will continue to collect information and data on the participation of organizations with Observer Status in Codex work and present the results at the relevant CCEXEC and CCGP sessions following the next Review of NGOs with Observer Status, currently scheduled for 2026.

Other issues

17. A separate issue that has arisen on several occasions is that a representative of an NGO registered for a Codex meeting wishes to or attempts to intervene on behalf of another NGO (that is not a member of the participating NGO).
18. It is axiomatic that interventions by a representative of an Organization in Observer Status pursuant to paragraph 5.1 a) of the Principles are on behalf of the Organization they represent and for which they registered for the meeting. As such, it would not appear *a priori* necessary to amend the Principles to confirm the basic tenet that an Organization in Observer Status can only represent its own organization at meetings.

Recommendations

19. CCGP33 is invited to review the present document and provide guidance as deemed appropriate. More specifically, CCGP33 is invited to offer its views on paragraphs 14-15 and 17.

⁶ "*The purpose of collaboration with International Non-Governmental Organizations is to secure for the Codex Alimentarius Commission, expert information, advice and assistance from international non-governmental organizations and to enable organizations which represent important sections of public opinion and are authorities in their fields of professional and technical competence to express the views of their members and to play an appropriate role in ensuring the harmonizing of intersectoral interests among the various sectoral bodies concerned in a country, regional or global setting. Arrangements made with such organizations shall be designed to advance the purposes of the Codex Alimentarius Commission by securing maximum cooperation from International Non-Governmental Organizations in the execution of its programme*".

SURVEY ON OTHER MODALITIES BY WHICH NGOs WITH OBSERVER STATUS WITH CODEX PARTICIPATE IN AND CONTRIBUTE TO CODEX WORK

The last Review of NGOs with Observer Status with Codex showed that NGOs are contributing to Codex work using means which were originally not included in the *Principles Concerning the Participation of International Non-Governmental Organizations in the Work of the Codex Alimentarius Commission* (Principles).

Based on this finding, CCEXEC83, paras. 123 – 128, requested the Codex Secretariat to prepare a working document for the 33rd Session of the Codex Committee on General Principles (CCGP33) to evaluate potential amendments to the Principles, which might recognize as part of the regular review, the contributions Observers may make to advancing the objectives of Codex other than through their participation in Codex standard setting activities. (See Procedural Manual: page 190, Section VII, Review of observer status, paragraph 28)

Based on the above request by CCEXEC83 and to draft a comprehensive document, the Codex Secretariat would like NGOs with Observer Status with Codex to participate in this short survey:

- **In addition to the activities outlined in the Procedural Manual i.e. by sending comments and / or participate in meetings (session of a Codex Committee, EWG, PWG, and VWG), what are other ways by which your organization contributes to Codex work?**

- **Has your organization ever organized/produced one of the below:**
 - a. Webinar / Workshop on Codex
 - b. Brochure / Publication on Codex
 - c. Social Media content on Codex
 - d. Guidance documents on Codex or use of Codex texts

- If you selected one of the above options, please provide details:

- **Are there other areas where you think observers could contribute to Codex in the future?**

- **Please provide any relevant input as you see fit.**

RESULTS OF THE SURVEY ON OTHER MODALITIES BY WHICH NGOs WITH OBSERVER STATUS WITH CODEX PARTICIPATE IN AND CONTRIBUTE TO CODEX WORK

#	NGO WITH OBSERVER STATUS WITH CODEX
1	CLITRAVI
2	Europatat
3	INC International Nut and Dried Fruit Council
4	ICUMSA
5	AOECS Association Of European Coeliac Societies
6	World Public Health Nutrition Association
7	FIVS
8	EURACHEM
9	International Accreditation Forum (IAF)
10	Helen Keller Intl
11	international food policy research institute (IFPRI)
12	Marinalg International
13	International Fruit and Vegetable Juice Association - IFU
14	Coceral
15	F.E.E.D.M.
16	ICGA - International Chewing Gum Association
17	ICGA - International Chewing Gum Association
18	Gafta - The Grain and Feed Trade Association
19	NMKL
20	Alianza Latinoamericana de Asociaciones de la Industria de Alimentos y Bebidas. ALAIAB
21	American Herbal Products Association
22	Council for Responsible Nutrition (CRN)
23	Global Alliance for Improved Nutrition (GAIN)
24	United States Pharmacopeial Convention (USP)
25	WPTC
26	IMACE
27	International Association of Fish Inspectors
28	Action Contre la Faim
29	International Stevia Council
30	FOSFA International
31	GOED - Global Organization for EPA and DHA Omega-3s
32	Centre for Climate Change and Environmental Studies

33	MoniQA
34	EU Specialty Food Ingredients
35	FEFAC
36	International Frozen Food Institute
37	ICAAS
38	Institute of Food Technologists
39	European Federation of the Associations of Dietitians (EFAD)
40	Food Industry Asia
41	World Federation of Public Health Associations
42	CLITRAVI
43	Healthy Caribbean Coalition
44	The Good Food Institute
45	International Food Additives Council
46	ICMSF
47	EFPPA
48	Public Research and Regulation Initiative (PRRI)
49	OENOPPIA
50	International Feed Industry Federation (IFIF)
51	IADSA
52	Working Group on Prolamin Analysis and Toxicity

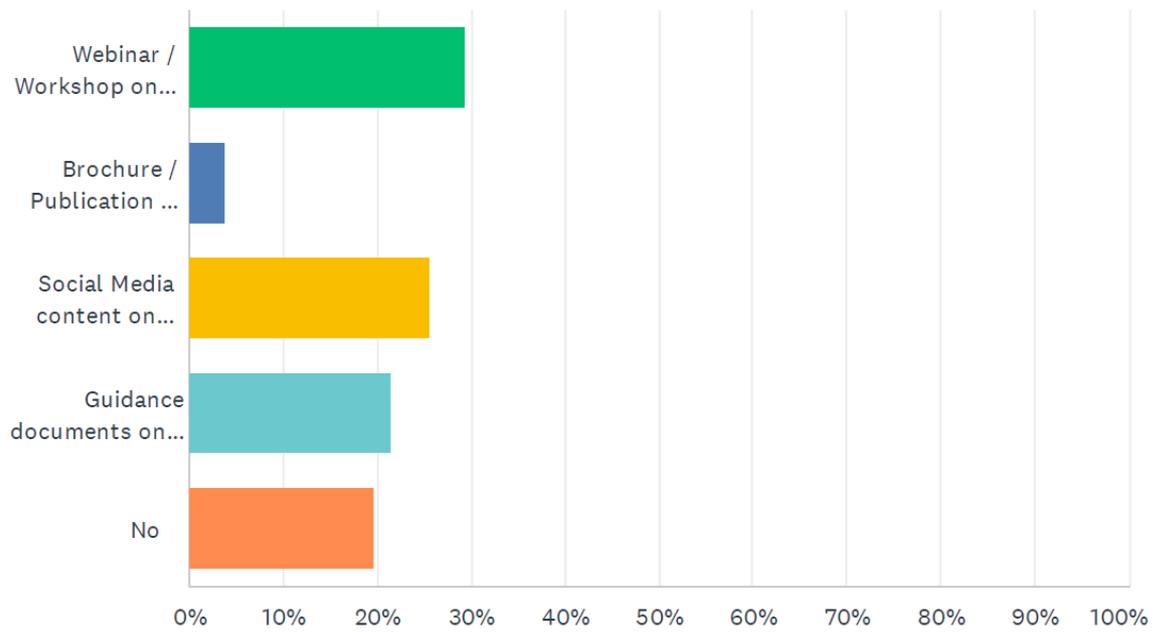
Q1 In addition to the activities outlined in the Procedural Manual i.e. by sending comments and / or participate in meetings (session of a Codex Committee, EWG, PWG, and VWG), what are other ways by which your organization contributes to Codex work?

1	Application for a seat on the working group on testing methods for nitrites and nitrates
2	We follow the discussion at Codex level to see the impact on our sector.
3	No other ways than those outlined in the Procedural Manual.
4	Review of Codex documents via Codex-OCS
5	since 1993, AOECS contributed actively in the modification of some Codex Standards to protect the gluten intolerant population.
6	We create awareness of the CODEX process among entry-level professionals and opportunities for them to get involved.
7	N/A
8	EURACHEM produces guidance in support of the quality of analytical measurements and testing, which often referred to in Codex guidance. EURACHEM regularly informs its members (networks based in 36 European countries) about Codex activities during the annual meeting. Eurachem contributes to promoting Codex activities related to the quality of analytical measurements and testing via articles on its own website and highlights on socials (Twitter).
9	As IAF Liaison, provide input into the CODEX and ISO revision processes for food and feed sector standard development and review.
10	Helen Keller Intl's engagement with Codex has included the following efforts: drafting and sharing technical and advocacy briefs, conducting webinars, submitting comment documents, participating in working groups, hosting multiple meetings and calls (in-person, virtual, with groups, with individuals), and attending open forums.
11	Much food related research carried out in CGIAR--can be used to inform standards development
12	n/a
13	When reviewing Codex proposed new or revised text relevant to our sector proposals are sent to our members for consultation at each step. We seek our members views prior to submitting our comments. Any finalised texts are also circulated to members. When requested we will provide guidance to our members on interpretation of relevant codex standards. In the 6 month newsletter we update our members with Codex developments. We hold an annual training program which also includes a lecture on legislation, including codex standards. We monitor WTO legislation notifications. We particularly take care to monitor proposed legislation concerning fruit juices that deviates from the Fruit Juice standard and we will make comments to the relevant government highlighting any differences.
14	Coceral is interested in assessing the advances of Codex Alimentarius in areas beyond its original mandate, namely, on environment and sustainability. This is relevant as at a moment the EU institutions are quickly moving on regarding sustainability. Due to its privileged position Codex has been at the centre stage of international standards, and could be a facilitator of global processes in that field.
15	none
16	Promotion of Codex approved texts and work of regional coordinating committees' work on national food control systems in the various regions, including their work on regional standards within the ICGA membership (food companies).
17	Promotion of Codex texts and the regional coordinating committees' work on food control systems and regional standards, towards ICGA membership

18	Gafta provides regular Codex meeting updates and decisions in its newsletter to its 2000 company members in 180 countries. Gafta promotes Codex work, 60th anni or any updates to relevant standards at our key events for the agri commodity trade. Gafta funds and jointly with private sector coalition of farmer and business groups established in 2016 advocates for an improved and more efficient Codex process on MRLs, with a focus on the functioning of JMPR and CCPR, produced case studies. In coalition we: Recognise growing demands on Codex, need for Funding for Codex scientific work, need for countries to make available experts to provide scientific advice, develop Communications during the JMPR review process, highlight delays between pesticide registration and establishment of a Codex MRL and underline the trade impact and importance of Codex pesticide MRLs. Gafta is regularly represented on Panels and side events in WTO and other international fora and promote Codex, need and benefit of international standards and for countries to use these standards
19	None that comes to my mind
20	ALAIAB is planning a Webinar for the 60th anniversary of CODEX next month.
21	AHPA reports to its members on the activities of Codex and serves as a point of contact between the herbal and dietary supplements communities and the Codex platform.
22	Celebrated Codex 60th Anniversary with a photo, and will be posting on our own social media.
23	We promote Codex texts in professional meetings. We share the relevant text with our country offices. We analyse existing Codex texts as guidance for our work on food safety and nutrition.
24	We share data on food additive analytical methods and composition with JECFA
25	none
26	proposal for new work based on a call for proposals
27	Dissemination of Codex proposals to private stakeholders in the fishery and aquaculture sector, governments and NGOs, to allow them to develop comments for submission by national codex committees
28	No other way
29	webinars in 2018 and an interview with the Codex Secretariat in 2023
30	No other
31	This may not be the type of example which you were looking for, but when GOED submits comments to regulatory authorities, we refer to Codex activities and documents when appropriate. For example, GOED recently submitted comments to FSANZ's infant formula consultation and referred to CCNFSDU's recent work on follow-up formula. In addition, recently, GOED submitted a Proposal for New Work to CCFO.
32	Advocacy for stakeholders engagement, awareness creation and policy support for implementation of Codex recommendation at the national level.
33	Teaching and communication to stakeholders about importance of Standards, of Codex work, of emerging food safety and quality issues, webinars, workshops,
34	Not applicable.
35	none
36	Those our primary activities.
37	We would like to contribute to Codex work by sending comments thereafter.

38	IFT contributes to Codex by elevating the role of Codex to the global food science community it represents via numerous means, including educational programs, conference sessions and update communications to our over 12,000 individual members and 16,000 plus annual conference attendees. Additionally, IFT has a Codex specific team of members numbering over 30 who engage in reviewing new Codex technical documents, focused on specific Codex general committees (e.g., CCCF, CCFH), contribute to development of Conference Room Documents (CRD's), EWG's, and development of digital content for IFT members (e.g., Codex newsletters summarizing Codex committee meetings), provide training on understanding and engaging with Codex, and interact with IFT members on Codex topics as needed. IFT also engages with the US Codex Office on scientific topics associated with Codex documents, supports members interested in joining WHO/FAO scientific efforts (e.g., JECFA, JEMRA, etc.), participates as a scientific contributor with the Food Industry Codex Coalition, and contributes input into Codex strategic planning.
39	We have participated attending some Codex Committee meetings that address topics aligned with our expertise and knowledge, we have also joint some eWG discussions on topics as food labelling and our most relevant work has been taking part of several consultations throughout the OCS platform.
40	Sharing and aligning on the submitted comments with various national industry associations, international associations and national codex committee
41	Training other public health and consumer groups in Codex processes, sharing position statements, participating in WHO trainings on Codex
42	Sending mails
43	We have not been engaged in CODEX work since joining as the primary reason we joined was to influence/ participate in the FOPWL related deliberations. We hope to engage on upcoming food policy related items however.
44	GFI has participated in a Codex-organized webinar on the role of Observer Organizations in Codex and published several blog posts about Codex's work on NFPS on our website. We also conduct periodic outreach to stakeholders in the alternative protein industry about relevant Codex activities.
45	Work with delegations on organization priorities and moving them through the step process. Speaking with JECFA or others on timing for calls for data. Serving as one of the administrators of the Codex International Processing Aids database.
46	Organising side events/sessions on relevant topics (i.e. events held for CCFH were on sampling and testing; microbiological criteria; whole genome sequencing)
47	Sending e-mails
48	Raising awareness with public researchers of the existence and importance of Codex guidelines, in particular the guidelines of safety assessment of biotech products, and of ways to provide input
49	Interactions with other stakeholders
50	IFIF has contributed to side events at different Codex Committee meetings to provide further information and data on animal feed relevant topics to Codex.
51	Sharing knowledge of Codex texts when new regulation is under development at national/regional level. Engaging in social media communication around Codex. Sharing Codex developments with members. Building tools to help understanding of Codex texts.
52	We are in contact with celiac societies that use our know how in the different Codex committees.

Q2. Has your organization ever organized/produced one of the below:



ANSWER CHOICES	RESPONSES	
Webinar / Workshop on Codex	29.41%	15
Brochure / Publication on Codex	3.92%	2
Social Media content on Codex	25.49%	13
Guidance documents on Codex or use of Codex texts	21.57%	11
No	19.61%	10
TOTAL		51

Q2bis. If you selected one of the above options, please provide details:

#	RESPONSES
1	When a relevant discussion is taking place at Codex, we always assess its impact on the EU requirements. If necessary, we can discuss it internally with the industry. However, so far we have not organized a specific meeting dedicated to Codex.
2	A member of ICUMSA was also a member of a number of Codex working groups at the same time. He prepared a presentation to explain the need for harmonization of methods and protocols defining the status of methods. This has led to improvements in the format of ICUMSA methods.
3	We developed the AO ECS Standard for the requirement to use the international Gluten-free Symbol "Crossed-Grain" on food products. The definition of 'gluten-free', the labelling requirements and the requested analytical method are identical with CXS 118-1979. National coeliac societies within Europe and also beyond may allow the food producers to put the Gluten-free Symbol on their food products if they fulfill all requirements of the AO ECS Standard (Audit requirements, analytical certifications etc.).
4	We organise webinars regarding Codex's ongoing activities, in particular concerning Codex Circular Letters requesting comments, in order to find a consensus position that we can then submit to Codex.
5	Eurachem blog on the 60th Codex Anniversary https://www.eurachem.org/index.php/mnu-blog/475-blg-foodsafe2023 Eurachem blog to celebrate the World Metrology Day 2023 themed on "Measurements supporting the global food system" https://www.eurachem.org/index.php/mnu-blog/469-blg-wmd2023 Eurachem blog to celebrate the second World Food Safety Day (7 June 2020) https://www.eurachem.org/index.php/mnu-blog/336-blog-foodsafe2020 Retweeting Codex Contents in several occasions
6	Helen Keller Intl has developed and hosted webinars (independently or jointly with UN agencies) regarding topics up for discussion at both CCNFSDU and CCFL. These webinars' target audiences are Codex stakeholders in low and middle income countries, with the intention to empower these Member States to have a stronger voice in setting global policy.
7	opportunities for undertaking research based on Codex needs is submitted after the CAC
8	We support the World Food Safety day through our social media channels.
9	Twitter campaigns-LinkedIn posts.
10	Tailor-made training-like sessions for ICGA member company representatives - on a global or regional basis - to explain the work process of the main Codex Alimentarius Committees where ICGA is involved proactively in, as well as differences between the CAC, the CCEXEC and enhanced interest in the specific focus and roles of regional coordinating committees.
11	Tailor-made training-like sessions for ICGA members on a global or regional basis to explain the work process of the main Codex Committees where ICGA is involved proactively in, as well as the difference between the CAC, the CCEXEC and particular interest and role of regional coordinating committees.
12	We use social media to promote use of international standards for the grain sector and underline the importance. This year we have promoted 60th Anniversary of Codex on social media to improve knowledge and remind on what has been achieved for our sector.
13	Last month, I participated as a speaker in the national celebration of the 60th anniversary of CODEX in Costa Rica.

14	AHPA has previously released a guidance document, "Codex Alimentarius and Dietary Supplements", to aid the industry in understanding and complying with the 2005 Guidelines for Vitamin and Mineral Food Supplements. AHPA provides similar information regarding Codex standards directly to its members as warranted.
15	See above, i.e. Codex 60th. Also did a trade press article on Codex and why involvement is so critical for the nutrition industry.
16	I have shared Social media content on Codex meetings I have attended. I have also further shared news coming from the Codex office on social media. I have also presented papers on Codex work at professional meetings.
17	We have used LinkedIn to bring attention to Codex activities and our involvement in Codex work.
18	Announcing our participation to a specific committee and/or highlighting a specific topic discussed of relevance for our sector.
19	Codex measures regularly published in the quarterly Fish Inspector (joint IAFI/FAO/Infosh) publication, and distributed via our website and Social media pages.
20	Mostly and to be more specific, some presentations of the Codex work were made to other members of the organization in order to present the standards, where they come from and the governance on food safety
21	4 Webinars on Stevia with the Regional Codex Representatives of CCLAC (in English and in Spanish), CCAfrica (East Africa) and CCNE. We worked very closely with the Codex Regional Coordinators who were extremely helpful and committed to support this informative webinars
22	Organised workshop and webinars on Codex activities and created awareness among stakeholders
23	we organised pre-meetings to CCMAS in Budapest, we included Codex training in our university courses and in standardisation workshops as well as conference sessions on method validation
24	We issued a guide to be a "Codex hero" for our members: https://www.specialtyfoodingredients.eu/publications/eu-specialty-food-ingredients-explains-how-to-be-a-codex-hero/
25	Contribution to the drafting of the IFIF/FAO Manual 'Good Practices for the Feed Sector based on the Codex Code of Practice for Animal Feeding.
26	A member related webinar in preparation for the Codex Food Hygiene Committee meeting.
27	Annual Guidance on the most relevant Codex activities for the member organizations had been produced from 2013 to 2020.
28	IFT has actually done ALL of the above at some point. We held a Workshop session on Codex at the IFT annual meeting in 2022 (attended by over 100 people) and also a session including Codex as a topic of discussion on Harmonizing Global and Regional Standards in July 2023. Additionally, IFT holds educational sessions and IFT sends out to professional members quarterly newsletters on Codex activities with summaries of General Committee meetings by IFT Codex Team Leaders. IFT has posted internal IFT social media on Codex activities and also provided guidance information on Codex texts and plans to continue doing so.
29	In our general assemblies of members, we report on EFAD's participation in Codex consultations, which are included in the annual reports, as this one from 2021. https://www.efad.org/wp-content/uploads/2023/06/33.5-EFAD-Annual-Report-2021_FINAL.pdf
30	Organised a side-event to CCASIA few years back to share the importance of Codex and to promote the adoption of Codex text in Asia
31	Option above only allowed selecting one option. We have tweeted from meetings to inform the public about negotiations, we have also participated in WHO Member State sessions on Codex positions on specific issues in our expertise (e.g. front-of-pack labelling) and we

	have conducted academic research on Codex processes and published these papers in peer reviewed journals.
32	CLITRAVI has not organized/produced one of the above
33	We have not put on any of the above but this was not an option and a response was required.
34	GFI has published a small number of blog posts on our website relating to Codex, GFI's role as an observer organization, and Codex activities pertaining to new food sources and production systems.
35	We share and post on LinkedIn during the Codex meeting. IFAC and the Kellen China office has hosted a reception during CCFA in the past.
36	WFS day document on FAO website on importance of Codex work; Twitter messages on participation in Codex Committees and relevance of Codex outputs
37	We tried to send comments the other day on the vegetable oils standards but we could not login in, we sent a mail three times to help us and no answer received
38	In workshops that PRRI organizes about biosafety, we present the different regulatory frameworks that apply to environmental safety and food/feed safety of biotech products and the commonalities and differences between environmental risk assessment and food/feed safety assessment.
39	Sharing of Codex publications
40	Together with FAO published in 2010 the FAO/IFIF Manual of Good Practices for the Feed Sector based on the Codex Code of Practice on Good Animal Feeding, that was updated it in 2020.
41	Guide and video on Codex texts impacting our product category (food supplements).

Q3. Are there other areas where you think observers could contribute to Codex in the future?

1	Not for the time being
2	No comment.
3	Sustainability
4	Better options for contacting relevant committees to provide updates. This is particularly important when methods referred to by Codex have been updated.
5	We had already the discussion with some food producers to think about promoting the need for gluten-free foods (incl. risk assessment during the production etc.) on the Codex food safety day, maybe in cooperation with Codex.
6	Creating awareness of meetings/topics and processes around Codex. Guiding newly joined observer members.
7	N/A
8	The above-mentioned activities cover the range of activities in which Eurachem can provide support
9	Invite Codex representatives to IAF Food Working meetings as guest speakers.
10	The areas of engagement outlined above are all critical and comprehensive, where there is a need is for more engagement from Observers, particularly civil society organizations.
11	There should be an Observers organization meeting associated with the CAC session as a side event. Don't forget, you heard it here first!!!
12	n/a
13	At the moment, no.
14	Quickly evolving areas related to the political direction and scope of Codex
15	-
16	Yes. Enhance further the public-private partnership and clarify the relationship(s) between Codex standards with other standards such as GFSI or ISO, by creating a platform of exchange of information opened to all Codex members and observers
17	Yes, enhance the public-private partnership further and clarify further the relationship of Codex standards with other standards such as GFSI or ISO, by creating a platform of exchange of information opened to Codex members and observers.
18	Digitalisation is key to advance many of the obstacles facing Codex and observers can play a role. Codex processes are overwhelmed and backlogged especially in field of pesticide residues. Encourage govts to appoint more scientists and work during normal working hours.
19	None that comes to my mind
20	The diffusion in our social medias of the Importance of CODEX for the private sector
21	AHPA welcomes the opportunity to provide more direct feedback and interface between Codex and the herbal products community on those matters where it is relevant to both organizations' shared interests.
22	Continue championing industry engagement with Codex via trade press and social media.
23	Consultations with observers on what work on food is most vital to addressing the challenges of public health and climate change.

24	CCMAS, in particular, works very effectively with observers through the Inter-Agency Meeting (IAM) and includes an IAM report in the Committee plenary agenda (submitted as a CRD). Where observers have specific technical information or ongoing work that may be of interest to the Codex members, it may be beneficial to the members to find a way to encourage some collaboration between observers and members.
25	being consulted for advice as experts on specific sector
26	It is unclear at this stage if observers are allowed to propose new work. We think that allowing observers to propose new work would be interesting as this will obviously be very related to the issues/barriers that can be improved.
27	We want to start direct mailing stakeholders on specific measures to improve awareness to improve participation of private sector operators
28	It could be for data collection, but specific training on type of data and how to collect them would be necessary.
29	Meeting and webinars on successful case studies were Codex and industry representatives have worked together for the common good of food safety - an example is the Framework on Steviol Glycosides approved by JECFA that can be inspire other food additives producers on how to support the work of JECFA
30	Observers should be permitted to submit new proposal and work items as they may be closer to what is required by trade.
31	n/a
32	Observers can help in shaping the implementation of Codex activities and recommendations at national and regional level
33	generally public awareness building, also through social media
34	Communication and dissemination of Codex work to a wider public.
35	Nothing specific
36	I would like to see more inclusion of stakeholders in the JECFA risk assessment efforts. Exclusion of industry scientific experts is a flaw.
37	Communicating the CODEX policy to the world by using Codex texts
38	IFT believes that differentiating observers that are scientific individual membership organizations (vs. government or trade affiliated) from trade organizations or cause specific NGO's would be useful as it would help member countries to understand the basis of input being driven by science vs. possible other motivations.
39	EFAD is relatively new to CODEX and it is possible that we do not have enough experience to propose new forms of collaboration, as those currently available seem appropriate to us.
40	-
41	xx
42	A common definition of a sustainable food system as the EU is currently considering a legislative framework for a Union sustainable food system
43	Does CODEX have webinars around entry points for engagement? We think this would be useful but note that this may already be happening and we are unaware.

44	Observers may have a role in keeping Codex up to date on market developments and emerging standardization needs in areas of rapid development.
45	Offering data and expert opinion from manufacturers who are members of the organization.
46	Organising sessions at relevant conferences highlighting importance of Codex/Committee work and raising awareness of experts concerning Codex impact and relevance of contributing to scientific advice via FAO/WHO joint expert groups
47	We simply want to send an e-mail to the relevant desk officer dealing with a specific issue without the need to login which often does not work or is very time consuming
48	Mainly awareness raising about Codex
49	Diffusion of information of the work of Codex, to enhance the harmonization of global rules
50	I think the way observers are invited to contribute in the different Codex Committees, EWGs, etc, is well covered and we appreciate the opportunity to be involved in the important work streams of Codex.
51	Our product category has specific technical/regulatory requirements and the government officials sitting in Codex are generally not the experts in our sector. Therefore, we would be pleased to provide training sessions.
52	None

Q4. Please provide any relevant input as you see fit

#	RESPONSES
1	Not for the time being
2	When you send out a notification regarding proposed changes or/and discussions, it would be good to specify in the notification email how observers can contribute. We need a simple guide. This is because there can be staff changes and the new person is not well aware of what is going, etc.
3	Sustainability (i.e. environmental concerns, climate change) should be taken into consideration when tackling food safety.
4	My experience of Codex documents for review in the last few years is that some of the formatting doesn't work. That is, there may be a template in use, but it seems difficult to add/amend because I often report formatting problems (odd numbering, spacing, input of pictures rather than data tables, etc.).
5	Sometimes it is not helpful that any member could speak at first and afterwards the observers. In special cases some observers have much more experience and knowledge of a specific issue compared with some members and therefore it would be helpful to hear their expertise earlier.
6	--
7	FIVS very much appreciates the increasing opportunity to participate in virtual eWG sessions which allow to make rapid progress on Codex texts.
8	Thank you for the important contribution of Codex Alimentarius to improve food safety across the world over the past 60 years and in the future!
9	Codex could consider a collaboration with IAF for their podcast 'Accreditation matters' https://podcasts.apple.com/us/podcast/accreditation-matters/id1636250544
10	NA
11	Good to be back to physical meetings
12	n/a
13	No input at the moment.
14	(No available input to provide)
15	I am not sure on how my organisation participated in Codex Work in the past.
16	Promote further the food safety and quality expertise of industry professionals and that of their advisors
17	Promote further the food safety and quality expertise by industry professionals.
18	x
19	None that comes to my mind
20	I already wrote what was relevant for ALAIAB in the other questions.
21	As AHPA is focused on the herbal products and dietary supplements categories, its input in Codex proceedings is limited to activities involving such commodities. The OCS PleaseReview platform would be much easier to use if it were possible to have review titles appear in full (across multiple lines in the interface cell) rather than being cut off with an ellipsis.
22	Here's to the 75th Codex Anniversary!!
23	none
24	Thank you for providing this opportunity to comment and for Codex's commitment to listening to observers. We appreciate the opportunities Codex

	provides observers and the respect we always receive.
25	n
26	For small organisations/sectors like ours (who have no international body) it is difficult to manage the various committees to provide timely input. Some observers like the dairy sector are much bigger and are able to follow all committees and provide inputs. This might lead to a situation where only the powerful lobbies/observers can provide input.
27	We find many codex committees in developing countries are remote from the fishery sector operators affected by the measure e.g. they are based in standards bodies, or government only. Because of negligence of member states many measures are adopted before operators affected by them become aware.
28	This is more on the technicalities and not so much on the content but recently I have had issues to connect to the platform for contribution and to include comments in the texts under revisions
29	see above answer
30	The Observers are often the "real" industry representatives and therefore their views are important. They will have more hands-on information and implications that a Standard may have on the industry. The Observers feedback and input is thought to be taken less seriously than country representations. The Standards are after all for the trade of the commodities.
31	n/a
32	Include food producers/farmers in Codex activities and ensure active participation of observers in Codex meetings and sessions
34	Not applicable
35	Present working modalities work well
36	No additional information to share.
37	We have joined Codex meetings several times as an observer and could communicate each other using the useful information.
38	IFT believes that science should always be the basis of decision making on new standards, guidelines and codes of practice developed by Codex and that the Codex scope of activities should remain limited to agriculture, food and trade as it has been for the last 60 years.
39	We are open to other forms of collaboration that other members with more time participating in CODEX, may propose and that imply greater and more effective interaction with codex committees.
40	-
41	It is generally recognised that there are a lot of powerful industry associations at Codex with significant resource, and to date there has been lesser participation from public health and consumer groups. We have been trying to redress this balance by building capacity of public health and consumer groups to follow and participate in Codex, however we have very few resources to do so.
42	We fear protectionism and barriers to trade
43	NA
44	N/A
45	It would be nice to see future movement and elevated awareness of the Codex International Processing Aids database and how it could be formalized.
46	As an observer with expertise in microbiological food safety we are open to being invited/engaged by Codex/Committees or Member countries to relevant awareness raising or capacity building events
48	One particular aspect to highlight is the role of Codex standards in the WTO/SPS agreement

49	More interactions between observers from the same area of interest
50	Keep up the great work !
51	it is even more important today (post Covid) to know where meetings will take place at an early stage to enable flights at an acceptable cost to be booked.
52	None
