



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS (CCFICS)

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REPORT OF THE ELECTRONIC WORKING GROUP ON THE DRAFT GUIDANCE ON ESTABLISHMENT LISTING (STEP 3/4)

(Prepared by the Electronic Working Group chaired by Norway and co-chaired by Australia, India, Morocco, Saudi Arabia and Spain)

Codex Members and Observers wishing to submit comments, at Step 3/4, on this draft (Appendix I) should do so as instructed in CL 2026/67-FICS available on the Codex webpage/Circular Letters 2026: <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en/>

Executive summary

At its 27th Session, CCFICS agreed to commence new work to prepare the draft revision to the *Principles and guidelines for the exchange of information between importing and exporting countries to support trade in food* (CXG 89-2016), to include principles and guidelines to harmonize the use, development and implementation of establishment listing, for consideration by CCFICS28. This work is intended to be annexed to CXG 89-2016, with the objective of simplifying and reducing burdensome information requirements while ensuring that essential information is available to address identified food safety risks.

An Electronic Working Group (EWG), chaired by Norway and co-chaired by Australia, India, Morocco, Saudi Arabia and Spain, was established to undertake this work. Participation was open to all Codex Members and Observers, and the work was conducted through four rounds of written consultation between April 2025 and April 2026, complemented by a hybrid Inter-Sessional Working Group (IWG) meeting held in Oslo in March 2026.

Throughout the process, extensive comments were received and carefully considered. The discussions focused on clarifying the purpose, scope and appropriate use of establishment lists, emphasizing that such lists should not be encouraged as a default tool and should be applied only where justified, proportionate and based on risk. A strong emphasis was placed on a system-based approach, recognition of exporting countries' national food control systems, avoidance of duplication of controls, and minimization of unnecessary administrative burdens and trade disruption.

The draft Annex was restructured after the IWG, to improve clarity and flow, resulting in a clear separation between principles, initial considerations, process and implementation. Particular attention was given to limiting the amount of information required in establishment lists to what is strictly necessary for establishment identification, promoting digital information exchange, and ensuring transparency, timeliness and predictability in listing procedures. While some issues, such as the final stage of production to be listed and timeframes for re-listing, did not reach full consensus and remain bracketed, no fundamental differences of view were identified among EWG participants.

The draft Annex has now undergone four rounds of comments and an in-depth IWG discussion, resulting in a fifth and final draft. The Chair and Co-Chairs consider that there is broad support for the text and that remaining issues can appropriately be addressed through further discussion at the next CCFICS session.

CCFICS28 is therefore invited to note the work undertaken and consider recommending the advancement of the proposed Draft Annex to Step 5, or accelerated advancement to Steps 5/8, as appropriate.

INTRODUCTION

1. At the 27th meeting of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS27), Norway presented a discussion paper and new work proposal on revising the *Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food* (CXG 89-2016), to develop principles and guidelines to harmonize the use, development and implementation of establishment listings. The new guidelines are intended to be annexed to CXG 89-2016. This work should simplify and lessen the burden of establishment lists in order to decrease the requirements for data gathering.
2. CCFICS27 agreed to forward the proposal for new work to CAC47 (2024) for approval and this was approved by CAC47. It was further agreed to establish an electronic working group (EWG), working in English, chaired by Norway and co-chaired by Australia, India, Morocco, Saudi Arabia and Spain. The EWG would prepare the draft revision to CXG 89-2016, to include principles and guidelines to harmonize the use, development and implementation of establishment listing, for consideration by CCFICS28 at Step 4.
3. CCFICS27 further agreed that a report of the EWG should be submitted at least three months prior to CCFICS28; and to keep open the possibility of convening virtual meetings and/or a physical working group (PWG).

PARTICIPATION AND METHODOLOGY

4. The invitation for participation in the EWG was issued to all Codex Members, with a registration deadline of 15 January 2025. A total of 35 Codex Members and four Codex Observers registered to participate in the EWG. The list of registered participants is provided in Appendix II.
5. The work of the EWG was undertaken through four consultations:
 - a. The first consultation, from 9 April to 9 May 2025 sought comments on the first draft Annex developed by the Chair and Co-Chairs.
 - b. The second consultation from 18 October to 20 November 2025 addressed issues arising from the feedback from Members in the first consultation. It sought comments and proposals on the updated draft and included questions on specific matters for the EWG.
 - c. The third consultation was through an Intersessional Working Group (IWG). Invitations to participate in the IWG were sent to all Codex Members, as well as published on the CCFICS web page in October 2025. In February 2026 the third draft of the Annex was sent out to Members of the EWG and to those who had registered for the IWG. The IWG was held in Oslo 17-18 March 2026, with 32 Codex Members¹, one Codex Member Organisation² and two Codex Observers³ attending.
 - d. Following the IWG, a fourth draft including specific questions was circulated to the EWG from 27 March to 15 April 2026, together with a summary of the IWG discussions.
6. Based on comments received, a fifth draft has been prepared and is included in Appendix I of this report.

SUMMARY OF DISCUSSIONS

First and second consultation (April – November 2025)

7. As the draft guidelines were being developed as an Annex to CXG 89-2016, EWG members were informed that during the drafting process, the Chair and Co-Chairs used the text from this guideline (i.e. CXG 89-2016) to ensure consistency in language and terminology. The following information was also provided to EWG Members regarding the approach applied in the drafting process:
 - a. It was assumed that readers of the Annex were familiar with CXG 89-2016. Where the content of CXG 89-2016 was particularly relevant to the Annex, references to the relevant chapters had been included.
 - b. It was also assumed that Competent Authorities (CAs) were familiar with, and applied, existing CCFICS texts relevant to the exchange of information in trade situations (e.g. audits, assessments, import testing, questionnaires, certificates). These texts already provide substantial guidance for trade situations, in particular the *Guidelines for food import control systems* (CXG 47-2003).

¹ Australia, Brunei Darussalam, Canada, Chile, China, Costa Rica, Finland, India, Ireland, Japan, Kenya, Lebanon, Malaysia, Mexico, Morocco, Netherlands, New Zealand, Norway, Philippines, Poland, Republic of Korea, Saudi Arabia, Singapore, Spain, Thailand, Türkiye, Uganda, United Kingdom, United States of America, Uruguay

² European Union

³ International Dairy Federation, International Meat Secretariat

- c. Specific references to the application of this Annex to “feed” were not included, as CXG 89-2016 already applies to feed for food-producing animals where this may have an impact on food safety and/or fair practices in the food trade.
 - d. References to CCFICS texts on equivalence were not included, as work is ongoing to consolidate these documents. Depending on the outcome of this work, relevant references may be added as appropriate.
8. The EWG agreed, during the consultations, to:
- a. avoid repeating text from the main body of the guidelines in the Annex, unless deemed necessary for the understanding of the text;
 - b. include the following Sections: preamble, purpose and objective, and scope;
 - c. provide clarification on what is meant by the term “establishment list” in the preamble;
 - d. use establishment list(s) (noun) and establishment listing (verb);
 - e. use “*specific food products or groups of products*” throughout the document, to be in line with the terminology in the main document when referring to different concepts of “food”/“commodities”/“traded commodity” etc; and
 - f. use “*consideration of the use, design and implementation and/or updating of requirements for establishment lists from exporting countries*” when referring to the scope of the Annex.
9. There was a proposal to include text regarding the need for importing countries to be involved in the approval of establishments in exporting countries. However, the majority of the comments received did not support this proposal. References were made to CXG 89-2016 paragraph 4.2c, which provides clear guidance that the importing and exporting countries should recognize official controls, assessments and approval mechanisms already in place in the exporting country.
10. There was also an exchange of views on whether to include the concepts of pre-listing and pre-assessment, but there was no consensus on this. References were made to existing Codex texts on import control and assessment, such as CXG 47-2003 and CXG 89-2016, as several Members were of the opinion that this should suffice.

The hybrid Intersessional Working Group (IWG) in Oslo, 17-18 March 2026

11. A third draft was circulated together with a background document, well before the IWG.
12. The background paper summarized information provided in the first and second rounds (see above), and in addition the following information was provided:
- a. Following two rounds of comments, the preamble clarifies the nature and possible use of establishment lists, as well as confirming that the draft is to be read in conjunction with CXG 89-2016. It also includes language to avoid assigning undue weight to establishment lists or promoting their use. Further elements and detailed guidance are provided elsewhere in the Annex.
 - b. The Purpose, Objective and Scope have also been thoroughly discussed during two rounds of comments. As a result, the third draft clearly distinguishes between a Section addressing the purpose and objective of the Annex and a separate Section defining its scope. While the purpose focuses on the intent and function of the Annex, the scope sets out what is covered by the Annex.
13. Based on this information, the IWG agreed to commence its discussions on the Section on initial considerations, and to review the document paragraph by paragraph. The following was supported:
- a. An overlap and need for restructuring were identified in the sections on “roles and responsibilities”, “initial considerations”, “principles” and “format use and implementation”. To improve flow and avoid duplication, it was agreed to reorganise the text to start with a Section on principles, followed by a Section on initial considerations, and subsequently a Section on process and implementation. As a result, it was agreed that the Chair and Co-Chairs would further develop the revised structure following the IWG. Consequently, the text was revised, and certain Sections were merged with, or incorporated into, other Sections, as appropriate.
 - b. Text should be included underscoring that requirements for establishment lists should be based on risk. With regard to terminology, delegations intervening on this point expressed a preference for the use of the term “based on risk”, while leaving it to the EWG to further consider how this principle could best be reflected in the text.
 - c. The challenges related to the extensive amount of information often required in establishment lists should be addressed. It was emphasized that these requirements often exceed what is necessary for

establishment identification, are not consistently based on risk, and may not be appropriate for inclusion in the list.

14. It was also discussed whether requirements for establishment list should be limited to the final stage of production. In this regard, it was noted that for certain products, listing was required for multiple establishments along the food production chain, and that the Annex should reflect that such requirements should be limited and based on risk. In light of differing views, two alternative options were presented in brackets to the EWG.

15. In the Section on suspension and de-listing, it was proposed to clarify that this Section also regards reinstatement and re-listing. Two options were included in brackets to reflect the procedure in this regard, and it was left for the EWG to comment on this.

16. Furthermore, the IWG agreed not to include text on the responsibilities of food business operators (FBOs), as this was considered outside the scope of CXG 89-2016.

The fourth consultation (April 2026)

17. The fourth consultation was based on the discussions held within the IWG and the subsequent restructuring of the document. EWG Members were encouraged to focus on the substantive content of the guidelines, in particular the prepared questions. As the Annex had already been discussed through three rounds of consultations, and time for further discussion was limited, not all comments received could be addressed in the fifth and final draft (attached). The Chair and Co-Chairs therefore focused on responses relating to:

18. **Approval process:** The proposed inclusion of text in the preamble stating that establishment lists should not be used by importing country CAs as an approval process was commented on by several Members. While some supported the concept, others considered it unnecessary, unclear and in need of further elaboration if retained in the text. In light of these differing views, the concept was removed.

19. **Fair practices in food trade:** Concerns were raised regarding the inclusion of text in the first principle suggesting that establishment listing should be considered as a means to ensure fair practices in the food trade. Although fair practices fall within Codex's dual mandate, it was emphasized that such wording could encourage unnecessarily burdensome listing requirements and would require clarification as to whether risk refers solely to food safety or to the broader mandate. Consequently, principle 1 was amended to include consideration of whether national food control system (NFCS) objectives can be, or are already, achieved through other, less trade-restrictive mechanisms, thereby addressing the concerns raised. Similar concerns were raised with regard to the preambular text on the use of this Annex. To reflect the dual mandate, "food safety" has been put in square brackets in the relevant part of the preamble.

20. **Equivalence as a principle:** The EWG was asked whether any key principles were missing at this point. The majority of respondents did not consider this to be the case. However, it was proposed to add text on equivalence in the principle relating to the system-based approach. As the Equivalence Working Group is undertaking work to consolidate several Codex guidelines on equivalence, it is suggested not to add text on equivalence at this stage. In this regard, the Chair and Co-Chairs would also like to highlight the importance of avoiding the introduction of equivalence as a requirement for the purpose of avoiding establishment listing.

21. **Additional controls, inspections and approval processes:** Regarding the principle on avoiding duplications of controls, inspections and approval processes, one Member proposed adding that the importing country CA "may exercise additional oversight, where justified by risk or necessary to fulfil public health requirements under its domestic framework" to ensure the sovereign rights of the importing country to protect public health. However, with reference to CXG 89-2016 paragraph 4.2c, it is the Chairs and Co-Chairs understanding that importing countries CAs should "recognize the official controls, assessments and approval mechanisms already in place in the exporting country".

22. **Additional principles on transparency, timeliness and confidentiality:** Transparency and timeliness is now included in principle 7. It was also proposed to add a principle on respecting confidentiality. However, as this is already reflected in the principles in CXG 89-2016 and in the Section on content and format, this has not been included in the principles.

23. **Terminology related to risk:** While the majority of the respondents supported using "based on risk", a limited number expressed a preference for alternative formulations such as "risk based", "risk-based justification" or "risk based and supported by evidence". It was also noted that further clarification might be required following the most recent revision of the Annex, and a proposal was made to include an explanation or a footnote referring to the *Working principles for risk analysis for food safety for application by governments* (CXG 62-2007). This matter remains subject to further consideration.

24. **Final stage of production:** The EWG was presented with two options regarding limiting listing requirement to either 1) the FBO conducting the final manufacturing of the products or 2) the FBO performing the last stage of production or processing where controls relevant to identified risks are applied. As there was

no consensus or clear majority for either of the proposals, both options are kept in brackets, with some amendments.

25. **Digital information exchange:** The text on digital information exchange received a lot of support and the brackets are removed. In addition, some amendments have been included as proposed.

26. **Replacing text on amendments to establishment lists:** The text regarding amendments to requirements for establishment listing is now reflected in the Section on “Updates and amendments”.

27. **Restructure of Section 9 Suspensions, de-listing, reinstatement and re-listing:** Based on comments received, this Section has been restructured to improve clarity and readability.

28. **Re-listing:** With regard to the two alternative options on timeframes for re-listing, some Members preferred the first option, leaving this for the exporting and importing country to agree upon. The majority of the Members responding, however, preferred the second option, expressing that the importing country CA should evaluate requests for reinstatement or re-listing without undue delay, based on the provided evidence or information and in accordance with the established criteria for listing. As there was no consensus, both options are kept in brackets.

CONCLUSIONS

29. The draft Annex has undergone four rounds of comments in the EWG, as well as a hybrid IWG discussion, resulting in a final fifth version of the Annex (attached as Appendix I of this document).

30. Although certain issues still might require clarification, the Chair and Co-Chairs consider that there is broad support for the Annex, and that no fundamental differences of views exist among the EWG Members.

31. The Chair and Co-Chairs consider that it would be appropriate to pursue the remaining discussions at the next CCFICS session and wish to indicate the availability to support the discussions if required.

RECOMMENDATIONS

32. CCFICS28 is invited to:

- a. note the work undertaken to date and the level of support for this work;
- b. consider the outstanding issues; and
- c. consider recommending the advancement to Step 5 or accelerated advancement to Step 5/8 of the proposed draft Annex on Establishment Listing to the *Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food* (CXG 89-2016) (Appendix I).

LIST OF APPENDIXES:

Appendix I	Draft Annex to CXG 89-2016, the final output from the work of the EWG
Appendix II	List of registered participants for the EWG

APPENDIX I**DRAFT ANNEX TO CXG 89-2016 – PRINCIPLES AND GUIDELINES TO HARMONISE THE USE, DESIGN, IMPLEMENTATION AND UPDATE OF ESTABLISHMENT LISTS****Section 1 - Preamble**

1. Establishment list(s) and establishment listing refers to information exchange between importing and exporting countries on eligibility of individual Food Business Operators (FBOs) to trade specific food products or groups of food products.
2. Most trade in foods occurs without the need for establishment lists to be developed or maintained by importing and/or exporting countries. However, should an importing country consider developing or maintaining establishment lists, this Annex should be used in accordance with the principles and guidelines on information exchange laid out in *Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food* (CXG 89-2016).
3. Establishment lists are mentioned in several CCFICS documents⁴. In international trade, establishment lists can be used to identify establishments in the exporting country that are eligible to export specific food products or groups of products to the importing country, and that a National Food Control System (NFCS)⁵ is in place which oversees FBOs seeking to export food. Establishment lists, however, should not be considered a necessary component of an import/export protocol.
4. Use of this Annex should decrease the requirements for burdensome information-collection, whilst ensuring that essential information is readily available to importing countries Competent Authorities (CAs), if necessary to address a specific, identified [food safety] risk.

Section 2 – Purpose and objective

5. The purpose of this Annex is to provide further principles and guidelines to CAs when determining whether the use of establishment lists may be justified, and when justified, how this can be used in an appropriate, cooperative and least trade-restrictive manner. Use of this Annex will facilitate harmonized, streamlined and timely information sharing.
6. This Annex is not intended to encourage the use of establishment lists by importing country CAs and should not result in increased or duplicative requirements for such lists.
7. The objective of this Annex is to minimize the burden of establishment listing while protecting the health of consumers and ensuring fair practices in food trade, by promoting:
 - a. consistent, transparent, risk-based and system-based approaches to the initial consideration, use, design, implementation and update of establishment lists,
 - b. simplification and harmonization of information requirements and use of interoperable data formats, to facilitate efficient and reliable information exchange.

Section 3 - Scope

8. This Annex applies to situations where the CAs of importing countries consider introducing or already have requirements for establishment lists from exporting countries. It sets out high level principles and guidelines for the consideration, use, design, implementation and update of such requirements.

Section 4 - Principles

9. In addition to the principles listed in CXG 89-2016 Section 5 (bullet a – f) and related Codex texts, both importing and exporting country CAs should be guided by the following principles when considering use, design, implementation and/or update of establishment lists:

Principle 1: It should be considered whether establishment listing is an appropriate and necessary response to the food safety risks posed by specific food product or groups of products, and whether NFCS objectives can be or are already met through other, less trade-restrictive mechanisms.

Principle 2: A risk-based, proportionate and least trade-restrictive approach should be applied when considering the use, design, implementation and update of establishment lists.

Principle 3: Establishment listing should rely on and support a system-based approach, recognising the role of the exporting country NFCS in managing food safety risk, and avoid duplication of controls, inspection and approval processes already implemented by the NFCS of the exporting country.

⁴ CXG 26-1997, CXG 34-1999, CXG 38-2001, CXG 47-2003, CXG 89-2016

⁵ CXG 82-2013 *Principles and guidelines for national food control systems (NFCS)*

Principle 4: Establishment listing should minimise the administrative burden by avoiding duplicative and repetitive information requests and unnecessary information exchanges, utilising electronic means and/or digital platforms where possible and appropriate.

Principle 5: Competent Authorities should avoid requiring information beyond what is necessary to identify eligible establishments, unless justified by risk.

Principle 6: Information exchange and associated processes related to establishment listing should not unnecessarily disrupt trade.

Principle 7: Competent Authorities should promote consistency, harmonisation, predictability, timeliness and transparency, including through clear and publicly accessible requirements and procedures in establishment listing processes, when used.

Section 5 – Initial considerations

10. Before introducing, designing, implementing or updating requirements for establishment lists, the importing country CA should consider the principles and guidelines listed in paragraph 1 in the main document (CXG 89-2016). *Guidelines for Food Import Control Systems* (CXG 47-2003) contains the framework for the development and operation of an import control system and *Principles for Food Import and Export Inspection and Certification* (CXG 20-1995) contains pertinent information regarding certification, inspection, requirements, and risk assessment. In addition, the following Codex guidelines should be considered:
 - a. *Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems* (CXG 26-1997),
 - b. *Guidelines for Design, Production, Issuance and Use of Generic Official Certificates* (CXG 38-2001), and
 - c. *Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems (NFCS)* (CXG 101-2023).
11. When considering the introduction and use of establishment lists, importing country CAs should take account of the following:
 - a. The use of establishment lists should be based on risk and should only be required where it is deemed necessary and proportionate to achieve NFCS objectives as appropriate. Establishment listing should be considered only where less trade restrictive requirements are insufficient to manage the risk.
 - b. Establishment listing should be grounded in a system-based approach rather than an individual establishment evaluation approach and should not be a first choice for importing country CAs to receive assurances about exporting country establishments or NFCS, which can be achieved by means other than establishment listing.
 - c. Exporting country CAs should be allowed to provide information by other means, to demonstrate they are managing the risk to an acceptable level, instead of implementing requirements for establishment lists.
 - d. [The requirement for establishment lists should be limited to the FBO conducting final manufacturing of the food products or groups of products exported and should not extend to other establishments along the food production chain, unless justified based on risk and supported by evidence.]
OR
[The requirement for establishment lists should be limited to the FBO performing the last stage of production or processing where controls relevant to identified risk are applied. Such requirements should not extend to other establishments along the food production chain, unless justified based on risk and specified by the regulatory requirements of the importing country CA.]
 - e. The level of information exchange and detail required should be proportionate and narrowly tailored to the risk posed by the specific food products or groups of products. Unnecessary and resource intensive requests for detailed information which are not based on risk, should be avoided.
 - f. The importing country CA should clearly specify and share its requirements and legislation relevant to establishment listing in a transparent manner. General references to the legislation without specifying the requirements should be avoided.
 - g. Establishment lists should not link eligibility of exporting country establishments to individual importers in the importing country. Separate listing processes per importer should be avoided.

Section 6 – Process and implementation

12. When requirements for establishment lists are justified, the importing and exporting countries CAs should follow the process as described in Section 6 in CXG 89-2016 for information exchange. In addition, the importing country CA should:
 - a. Explain and justify the requirements by sharing all pertinent information, including through notification and, on request, enter into consultations with exporting countries.
 - b. Allow an adequate transition period prior to implementation to ensure that the requirements do not unnecessarily disrupt trade.
 - c. Encourage the exchange of relevant information through digital platforms where available and appropriate; and consider their development where they are not yet in place.
 - d. As an alternative to requiring a separate establishment list, reference, when available, to updated lists of eligible establishments maintained by the exporting countries CAs on a publicly available official website or platform. Otherwise, the importing country CA should explain why the establishment list published by the exporting country CA does not meet their needs.
 - e. When there are multiple CAs in the importing country, avoid requesting more than one establishment list for the same products or groups of products to prevent unnecessary burdens on exporting country CAs.
 - f. Publish establishment lists received from the exporting country CA online in a timely manner, provided there are no objections, and allow imports to commence without undue delay or the need for prior assessments.
 - g. Use information received from the exporting country CA only for the purposes of establishment listing and protect this information from inappropriate use or disclosure to other parties.
13. Both importing and exporting country CAs should ensure the administrative process is transparent, efficient, timely and should seek to avoid unnecessary burdens and disruptions to trade. CAs should strive for timeliness in communication and avoid multiple exchanges of the same or similar information or repetitive submissions. Re-use of previously provided information should be facilitated where appropriate.

Section 7 – Content and format

14. The information required for the establishment list should be limited to what is necessary to identify eligible establishments. This should be limited to information readily available in exporting country CA's NFCS. Information that may be provided in the establishment list includes:
 - a. Name of establishment
 - b. Identification number of the establishment in the exporting country
 - c. Address, as used in the exporting country
 - d. Activities for which the establishment is eligible for export by the exporting country CA
 - e. Food product or group of products, as appropriate, for which the establishment is eligible for export by the exporting country CA.
15. If additional information beyond what is listed in paragraph 14 (a – e) is required, the importing country CA should explain why this information is necessary, with reference to the risk not being addressed by the information provided and by the exporting country NFCS (refer to Principles 3-5).
16. Commercially sensitive and personal data should not be required as part of establishment listing.
17. The importing country CA should provide and clearly explain the format of the list and the information required. Recognising that certain information elements may be structured differently in different countries the importing country CA should, where possible, allow the same format as is used in the systems of the exporting country.
18. Electronic exchange of establishment lists should be favoured to avoid paper copies. For electronic exchange of information, the use of internationally recognized data standards is encouraged to ensure harmonized data fields and facilitate interoperability.

Section 8 - Update and amendments

19. The importing country CA should:

- a. Have in place an efficient system and clear procedures which allows transparent, accurate and timely updating and publishing of the establishment list and which does not require duplication of processes or repeating submission of information already provided,
 - b. Ensure that errors on the list are amended without undue delay after being notified/informed by the exporting country CA,
 - c. Ensure that disruptions to trade are minimised while updating or rectifying errors on the establishment list,
 - d. Inform the exporting country CA once the update to the list is completed.
20. The exporting country CA should provide timely notifications to the importing country CA of required updates to establishment lists, including additions, de-listing and updates to information.
21. Amendments to requirements or application processes for establishment listings should be introduced by the importing country CA in a transparent manner and in accordance with paragraph 13, with appropriate explanations and sufficient time for adaptation.

Section 9 – Suspensions, de-listing, reinstatement and re-listing

22. The importing country CA should clearly define and communicate the criteria and processes for suspension, de-listing, reinstatement and re-listing of establishments or certain products or activities from an establishment, including the applicable time frames.
23. If an establishment or certain products or activities from an establishment is suspended or de-listed by the importing country, the importing country CA should promptly inform the exporting country CA, including the rationale and supporting information for the decision.
24. If an establishment or certain products or activities from an establishment is suspended or de-listed by the exporting country, the exporting country CA should promptly inform the importing country CA, including the rationale.
25. In the event of a suspension or delisting, the exporting and importing countries should agree on timeframes for eligibility of products in storage and transit to-minimize disruption to trade.
26. [Depending on the specific reasons for de-listing, exporting and importing country CA's should agree on necessary information and timeframes for re-listing.]
OR
[When the conditions that led to suspension or delisting have been addressed, the exporting country CA may notify the importing country CA and request reinstatement or re-listing of the establishment. The importing country CA should evaluate such requests without undue delay, based on the provided evidence or information, and in accordance with the established criteria for listing. The evaluation should be limited to what is necessary to address the specific concern.]

APPENDIX II**LIST OF REGISTERED PARTICIPANTS FOR THE ELECTRONIC WORKING GROUP ON
ESTABLISHMENT LISTING****CHAIR**

Norway

CO-CHAIRS

Australia

India

Marocco

Saudi Arabia

Spain

MEMBERS

Brazil

Canada

Costa Rica

Denmark

Egypt

European Union

Finland

France

Guatemala

Indonesia

Ireland

Japan

Jordan

Lebanon

Malaysia

Maldives

Mexico

Netherlands

New Zealand

Nigeria

Republic of Korea

Senegal

Singapore

Sweden

Thailand

Türkiye

United Kingdom

United States of America

Uruguay

OBSERVERS

Food Industry Asia

International Association of Fish Inspectors

International Meat Secretariat

International Union of Food Science and Technology