

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda item 11

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

Forty-seventh Session

Geneva, Switzerland, CIGG

25-30 November 2024

### COMMENTS ON A PROPOSAL ON THE DRAFT GOALS AND OUTCOME STATEMENTS FOR THE CODEX STRATEGIC PLAN 2026-2031

#### BACKGROUND

1. This document compiles the comments on a proposal on the draft goals and outcome statements for the Codex Strategic Plan 2026-2031 ([CL 2024/82-CAC](#)). The comments are those received through the Codex Online Commenting Systems (OCS)<sup>1</sup>, or via email by the time this document was issued. The comments are as shown in Appendix I.

#### EXPLANATORY NOTES ON APPENDIX I

2. The comments received are presented in a table format, with two columns as follows:
  - **First column** – Presents the comments with the rationale.
  - **Second column** – Presents the provider of the comments (name of member or observer)

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<sup>1</sup> OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

**COMMENTS IN REPLY TO CL 2024/82**

*Comments by Australia, Burundi, Canada, Costa Rica, Egypt, European Union, Indonesia, Iran, Japan, Morocco, New Zealand, Paraguay, Peru, Saudi Arabia, Somalia, Thailand, United Kingdom, Uruguay, USA and American Society for Nutrition, AOAC INTERNATIONAL, European Federation of the Associations of Dieticians, International Life Sciences Institute, ENCA, IBFAN, ICUMSA, Institute of Food Technologists NSF International, World Public Health Nutrition Association*

**GENERAL COMMENTS**

<b>COMMENT</b>	<b>MEMBER / OBSERVER</b>
<p>Australia is grateful for the opportunity to comment on the draft goals and outcomes for inclusion the 2026-2031 strategic plan.</p> <p>Australia supports the goals and outcome statements as drafted and thanks the CVCs for their efforts to bring this together.</p> <p>The goals and outcomes as drafted provide a useful framework for the organisation and its members to focus activities towards improving the efficiency and effectiveness of Codex and the impact of its standards (in protecting the health of consumers and ensuring fair practices in the food trade), including ensuring our work is not siloed and is able to contribute to global challenges with the environment and food systems.</p> <p>Naturally, there are many elements that are similar to previous strategic plans. It is our view that this in no way signifies a lack of ambition or strategy. This is reasonable considering that key issues affecting the work of Codex remain, and the associated goals and outcomes have not been fully realised.</p> <p>We support the step change in the way the goals and outcomes see a future where there is greater appreciation for how Codex (by doing its core work) can contribute to efforts to address global sustainability challenges. This is important because as countries and organisations progress strategies to improve sustainability, there is a key role for Codex to play in considering potential food safety risk and implications. Promoting this more integrated approach can help ensure food safety isn't an afterthought and doesn't stymie innovative approaches to addressing sustainability challenges.</p>	<b>Australia</b>
<p>Le Burundi apprécie le projet d'objectifs stratégiques et de déclarations finales présenté dans le document CX/CAC 24/47/21 ainsi que dans l'annexe I pour plus de commodité car trouer bien formulé et n'a pas de commentaire particulier additionnel à y ajouter.</p>	<b>Burundi</b>
<p>Canada appreciates the opportunity to provide comments on the draft proposed strategic goals and outcome statements for the new Codex Strategic Plan 2026-2031.</p> <p>General comments</p> <p>Vision, mission, and core values: Canada strongly supports retention of the current vision, mission and core values. These are fundamental, long-standing elements that continue to provide value to, and frame, Codex work and how Codex will function.</p>	<b>Canada</b>

**Timelines for the development of the new Strategic Plan:**

Canada notes that the new Codex Strategic Plan should serve the needs of its members until 2031, and thus, it is important to take the time to ensure that the proposed draft goals and outcomes, and associated objectives, activities and indicators, reflect the challenges and priorities facing Codex. We suggest that the current proposed draft requires further significant discussions and reflection by Codex members.

**Objectives, activities and indicators:**

Canada believes it is important to include draft objectives, activities and measurable indicators alongside the proposed draft goals and outcomes, in order to enable Codex members to have an informed discussion. The activities are needed to describe how the goals and outcomes will be achieved, and the indicators for how this would be measured. Inclusion of potential draft activities and indicators would assist Codex members in evaluating the proposed goals and outcomes, including feasibility, priority and relevance in a zero-growth budget environment. Canada notes that CAC45 agreed that a monitoring framework would be developed in parallel with the draft Strategic Plan 2026-31 and should inform the finalization of the Codex Strategic Plan. From our perspective, this monitoring framework is needed prior to the Commission being in position to finalize the Strategic Plan. It is particularly difficult to support new proposed goals and outcomes, such as those found in Goal 2, without understanding the related activities and indicators. It is also important to identify the responsible party/parties for the proposed outcomes.

**Suggested Additions:**

Canada believes that facilitating participation of all Codex members, particularly developing countries, remains highly relevant and should continue to be clearly reflected in the draft Strategic Plan. As such, we suggest consideration be given to including some elements from the current Strategic Plan for example, 4.1 "Enable sustainable national Codex structures in all Codex Member Countries." and 4.3 "Reduce barriers to active participation by developing Countries."

**"Strategic" vs "Functional" Goals:**

It is unclear to Canada as to the difference between a "strategic goal" and "functional goal". This approach may imply a hierarchy between the goals and may give the perception that the essential outcomes under the functional goal do not have the same weight or value as the strategic goals. We are of the view that such a distinction is not needed and propose that the functional goal become a strategic goal.

**Proposed Goals:**

Canada notes that three main thematic areas emerged based on responses to CL 2024/10-EXEC:

- Excellence of Codex core work
- Responsiveness of Codex work
- Prioritization in a resource limited environment, in a manner that supports both development and priority implementation needs.

Canada recommends that strategic goals should reflect these thematic areas, which are based on views from the wider Codex membership, and we are not sure that this is fully reflected the current proposed goals and outcomes.

<p>In addition, we note that the structure of the proposed Strategic Plan groups the fundamental work of Codex, i.e., the development of standards, into a single goal (Strategic Goal 1), and includes a new strategic goal (Strategic Goal 2), focusing on relationships with other international organizations, seemingly giving it equal weight to standards development. Further, as Strategic Goal 2 and Strategic Goal 3 include elements of working with international organizations that could place undue priority on this element of Codex' work. This could shift efforts from the main focus of Codex work, standards development, in a zero-growth budget environment. While relationships with other international organizations are important and are recognized in the Codex Procedural Manual, these should not overshadow the work of Codex and should not be placed on an equal priority with the fundamental work of Codex.</p> <p>Regarding proposed Strategic Goal 2, we have difficulty understanding the objectives of this goal and how it will advance delivery of the Codex mandate. We are concerned that the proposed goal and associated outcomes seem to be vague, very broad in scope, and it is unclear what the activities for Codex will be, who will be responsible for their delivery, what indicators would be used to measure the outcomes, what the concrete outcomes will be and how they will be used to advance Codex standards setting activities.</p> <p>We believe the proposed goals and outcomes require further consideration and discussion, in parallel with the draft monitoring framework.</p>	
<p>Egypt appreciates the work which done in the draft of the strategic plan</p>	<p><b>Egypt</b></p>
<p>The Member States of the European Union (MSEU) appreciate the opportunity to provide the following comments and suggestions of modifications.</p> <p>As a general comment, the MSEU welcome the proposal of CCEXEC86 to streamline the structure of the Codex Strategic Plan around three strategic goals and one functional goal.</p>	<p><b>European Union</b></p>
<p>Indonesia expresses its appreciation to CCEXEC for the progress achieved in developing the Codex strategic plan, especially in Part II. Concerning the draft strategic and functional goals presented, Indonesia recognizes that the proposed language adequately reflects Codex's needs. However, we wish to emphasize the importance of the first strategic goal: "Respond to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards."</p> <p>Indonesia encourages a more detailed definition of this goal in the development of outcomes and indicators, particularly in terms of how Codex can address the needs of developing member countries. We wish to highlight that during the 44th CCNFSDU session, the new work proposal on harmonized probiotic guidelines encountered difficulties in gaining consensus, despite compelling evidence supporting their necessity.</p> <p>In accordance with the criteria for the establishment of work priorities set out in the Codex Procedural Manual, which underscores the importance of consumer protection from the point-of-view health, food safety, ensuring practices in the food trade while considering the needs of developing countries, Indonesia believes that proposals for new work from developing countries should be given higher priority, as these countries often lack sufficient resources to develop standards or perform risk assessments.</p>	<p><b>Indonesia</b></p>

<p>Furthermore, other concerns exist regarding the involvement of countries in the EWG. As noted in the CCEXEC 86 report, the majority of the Electronic Working Group is currently led by approximately 10 percent of Codex members, predominantly from developed countries. To ensure the sustainability and inclusivity of Codex, increased support and assistance from Codex and other stakeholders are essential to encourage more new work proposals from developing countries and to encourage more Members to take leadership roles in committee working groups.</p>	
<p>Japan appreciates the opportunity to submit comments on draft Strategic Goals and Outcome. Japan generally supports the current draft, as these are appropriate and relevant for further advancing the purpose of Codex, which is to develop international food standards based on science and Codex risk analysis principles for protecting the health of consumers and ensuring fair practices in the food trade, in the period to 2031.</p>	<b>Japan</b>
<p>New Zealand welcomes a further opportunity to provide comments in response to a Circular Letter (CL) on the development of the Codex Strategic Plan 2022-2031. We have also greatly appreciated the opportunity to discuss the Plan with informally with CVCs in virtual regional meetings.</p> <p>New Zealand supports the CVC's ambition to present a final draft of the Plan to CAC47 for adoption, allowing adequate time for the monitoring and evaluation plan to be developed, discussed and agreed before the Plan comes into force 1 January 2026.</p> <p>We note that the strategic goals and outcome statements (Part II) have been carefully constructed and reviewed at CCEXEC86 (and CCEXEC85), based upon collective responses to the CLs of the wider membership. We support Part II in its entirety.</p> <p>We welcome the new section in the structure of Part 1 of the draft Plan. This outlines for the first time the role of Codex in addressing the challenges and opportunities posed by the drivers or global challenges.</p> <p>This submission sets out NZ's views on Part 1 of the draft Plan which currently sets out the vision, mission, core values; a narrative on drivers for change; the role of Codex; and a high level descriptor of ways of working, including specific comments on the 'One Health Approach' and the 'Loss of Biodiversity' that have been a focus in many of the discussions on the draft Plan.</p> <p>Structure of Part 1 of the Strategic Plan</p> <p>New Zealand supports the structure of Part 1 of the Strategic Plan that sets out the vision, mission, core values; a narrative on drivers for change; the role of Codex; and a high level descriptor of ways of working.</p> <p>Drivers of change/Role of Codex – and why is the section needed?</p> <p>The growing interest from many countries in the importance of addressing global challenges, such as those arising from food insecurity, climate change and environmental pressures, and in facilitating progress on broader sustainability goals is clearly acknowledged.</p>	<b>New Zealand</b>

Codex has a vital role to play by providing the necessary enabling environment through the development of international standards that address any potential food safety and trade implications to address these challenges that are not the sole purpose of Codex. In order to promote a strong Codex system and stay relevant to its membership, NZ considers it is important to articulate in the Plan how Codex can contribute to these multifaceted global challenges. We expect in doing so it will help other international organisations that we work together in parallel with to addressing global goals, address gaps and avoid duplication.

#### Vision and Mission

We support retaining the Codex vision, and mission as follows:

Vision “Where the world comes together to create food safety and quality standards to protect everyone everywhere.”

Mission “Protect consumer health and promote fair practices in the food trade by setting international, science-based food safety and quality standards.”

We consider the prerequisites for a Vision statement are met. It succinctly and adeptly provides a broad statement of Codex’s long-term goals and aspirations for the future in terms of its impact on the world,. Further, the Mission clearly and accurately sets out what Codex does, providing guidance to all on what it aims to achieve (as set out in its statutory purpose).

#### Core values to guide its work

We support the retaining the four core values to guide Codex’s work as they are. That is: Inclusiveness, Collaboration, Consensus building, and transparency. They are universally understood and applied by the Codex membership providing direction and purpose in their simplicity. Any additions run the risk of losing this.

#### A high-level description of Codex ways of working

We note the inclusion of elements listed from the last strategic plan – where they were goals (except the one in square brackets in relation to working with other international organisations to avoid duplication and the development of contradictory standards. All the other ‘ways of working’ are taken from the Codex Statutes (such standards based on science and risk, addressing current, emerging and critical issues in a timely manner etc) so we do not consider the inclusion the square bracketed text fits in this section. We do consider that the way in which we work with other international organisations is adequately captured in the goals and outcome statements (as set out below).

#### One Health

Since the ‘One Health Agreement’ between four international agencies (1) (March 2022) to strengthen cooperation to sustainably balance and optimize the health of humans, animals, plants and the environment to form a quadripartite collaboration for One Health was agreed, the Codex membership has been considering the extent to which the new

Approach can be incorporated into the work of Codex. This Approach however has been one of the more contentious discussion points in discussions on the Strategic Plan.

New Zealand strongly supports a One Health Approach in Codex to the extent of Codex purpose as set out in Article 1 of the Statutes of CAC (2) to protect the health of the consumers and ensure fair practices in the food trade.

Our task is therefore to find a way to strengthen cooperation to sustainably balance and optimize the health of humans, animals, plants and the environment in an integrated and unifying way given their close linkages and interdependence in the Codex context.

To this effect NZ supports CCEXEC86 agreement to add the new goal to:  
Strengthen relationships with relevant international organisations, promoting an integrated approach to address global challenges.

We further support the outcomes statements that further provide for a One Health Approach such as:

- The mutual understanding of the roles of CAC and relevant international organizations in relation to global challenges is improved and is supported by ongoing consultation between the parties.
- Gaps in approaches to addressing global challenges are identified through targeted engagement with relevant international organizations.
- The contribution of CAC to the transition towards sustainable and resilient food systems, is identified, and the development of relevant Codex texts undertaken accordingly.
- The use of Codex texts in the context of integrative approaches such as One Health is promoted.
- The profile and recognition of Codex as the international food standards setting body for protecting consumer health and ensuring fair practices in food trade is enhanced.
- Contributions from relevant international organizations are encouraged throughout the development of Codex standards.
- Foresight and horizon-scanning activities are used to support the identification of Members' needs and emerging issues in an evolving global environment.

It is important Codex is cognisant of, members rights, obligations and undertakings in the WTO, and other multilateral, regional and bilateral agreements and arrangements regarding sustainable and inclusive trade.

We see these statements provide the necessary mechanisms to encompass both top down as well as bottom up line of action to ensure Codex as an organisation, and its membership can fittingly contribute to One Health and sustainability goals in the development of Codex standards and texts, as relevant.

Whether or not to include biodiversity loss in the drivers for change.

Biodiversity loss is one of the global challenges the NZ government like other governments is working to address. NZ considers it is premature to include biodiversity as a 'driver for change' in Codex (as set out in Part 1 of the draft Plan).

<p>At this point in time we can find no feasible link between the loss of biodiversity and how Codex could address this impact through food safety standards. We therefore have concerns that including such a reference could create confusion, false expectations and have unintended consequences. We support further consideration of this issue if at some point a feasible link between the two is established. We consider it is important to be confident that Codex has something to contribute before including it as a global challenges.</p> <p>(1) In March 2022, four international agencies, the Food and Agriculture Organization of the United Nations (FAO), the World Organisation for Animal Health (OIE), the UN Environment Programme (UNEP) and the World Health Organization (WHO), signed an agreement to form a quadripartite collaboration on One Health.</p> <p>(2) <a href="https://www.fao.org/4/y5817e/y5817e02.htm">https://www.fao.org/4/y5817e/y5817e02.htm</a></p>	
<p>Paraguay estaría dispuesto a apoyar el avance del Proyecto de los Objetivos estratégicos, si se mejora la redacción del Objetivo 2 ya que queda poco claro a que Organizaciones internacionales se refieren y en que sentido tienen que estar más conectadas, hay varias que son parte del Codex y participan como Observadores tanto de la Comisión como de sus Órganos Auxiliares, y en el caso que haya más organizaciones que deseen participar, el proceso esta establecido en el Manual de Procedimientos.</p>	<b>Paraguay</b>
<p>Perú no tiene observaciones, gracias.</p>	<b>Peru</b>
<p>Saudi Arabia appreciates the opportunity to provide comments on the draft strategic goals and outcome statements presented in CX/CAC 24/47/21 and Annex I. We recognize the importance of these goals in guiding Codex's efforts to protect consumer health and ensure fair trade practices in an evolving global environment.</p> <p>In reviewing the proposed strategic goals, we believe that the inclusion of well-defined Key Performance Indicators (KPIs) is crucial for measuring progress and ensuring accountability. KPIs should not only track the implementation of science-based standards but also measure the impact on public health, capacity building, adaptability to emerging trends, and public awareness. Additionally, we suggest establishing mechanisms to monitor and evaluate the effectiveness of these goals regularly. Periodic evaluations, along with reports presented during CAC meetings, would enhance transparency, allow for real-time adjustments, and help regions align their internal strategies with the broader Codex objectives.</p> <p>1. Saudi Arabia fully supports the first strategic goal of "Responding to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards." In response to the outlined points under each goal, Saudi Arabia has carefully reviewed them and would like to offer the following comments:</p> <ul style="list-style-type: none"> <li>• Foresight and horizon-scanning activities are used to support the identification of Members' needs and emerging issues in an evolving global environment:</li> </ul> <p>This statement aligns well with Codex's mandate, but it could be strengthened by adding the importance of inclusivity. Foresight activities should aim to capture emerging issues not just at a global level but across various regions. A possible revision:</p> <ul style="list-style-type: none"> <li>o "Foresight and horizon-scanning activities are used to support the identification of Members' needs and emerging issues across diverse regions in an evolving global environment."</li> </ul>	<b>Saudi Arabia</b>



- Scientific advice that addresses the needs identified by CAC and subsidiary bodies is provided by FAO and WHO and the joint FAO/WHO scientific expert advisory bodies, informed by globally representative data and appropriate international expertise:  
This statement is already quite strong, but emphasizing the importance of capacity-building for data generation and collection, especially in underrepresented regions, could strengthen the inclusivity aspect. Revision could be:
  - o “Scientific advice that addresses the needs identified by CAC and subsidiary bodies is provided by FAO and WHO, informed by globally representative data, including efforts to enhance data generation in underrepresented regions, and supported by appropriate international expertise.”
- 2. Saudi Arabia fully supports the second strategic goal of "Strengthening relationships with relevant international organizations, promoting an integrated approach to address global challenges." In response to the outlined points under each goal, Saudi Arabia has carefully reviewed them and would like to offer the following comments:
  - Gaps in approaches to addressing global challenges are identified through targeted engagement with relevant international organizations:  
This objective is important as it highlights the identification of gaps in addressing global challenges, which is essential for coordinated action. However, it could be enhanced by specifying that the identification process is informed by data and risk analysis, in line with Codex’s mandate. Revision could be:
    - o “Gaps in approaches to addressing global challenges are identified through targeted, data-driven engagement with relevant international organizations.”
  - The use of Codex texts in the context of integrative approaches such as One Health is promoted:  
To reinforce Codex’s role in promoting global health, Codex could specify that this promotion is done through collaboration with relevant partners. Revision could be:
    - o “The use of Codex texts in the context of integrative approaches, such as One Health, is promoted through collaboration with relevant international organizations.”
- 3. Saudi Arabia fully supports the third strategic goal of "Maximizing the impact of Codex by increasing the visibility and use of standards." In response to the outlined points under each goal, Saudi Arabia has carefully reviewed them and would like to offer the following comments:
  - Effective and efficient Codex work management practices are refined and enhanced, exploiting digital and other new technologies to enable this:  
This objective is well-aligned with the functional goal as it focuses on efficiency and effectiveness in work management. However, to ensure global inclusivity, it’s important to consider the digital capabilities of all member states, particularly those from developing regions. Revision could be:
    - o “Effective and efficient Codex work management practices are refined and enhanced, exploiting digital and other new technologies, with capacity-building initiatives to ensure global inclusivity.”
  - Chairpersons and delegates are supported in their respective roles and their capabilities are developed:  
Supporting and developing the capabilities of chairpersons and delegates is critical to ensuring effective leadership and participation in Codex processes. However, this could be strengthened by explicitly including training and knowledge-sharing programs to ensure that chairpersons and delegates are up-to-date on relevant technologies, trends, and best practices. Revision could be:
    - o “Chairpersons and delegates are supported in their respective roles and their capabilities are developed through targeted training and knowledge-sharing programs.”

<p>Somalia recognizes the issuance of the draft strategic goals and functional goals within the Codex Purpose for the Codex Strategic Plan 2026-2031. Somalia welcomes these goals and looks forward to the continued and consistent application of these goals to advance and improve the mission of the Codex Alimentarius Commission.</p>	<b>Somalia</b>
<p>In principle, Thailand supports the Strategic and Functional Goals for the Codex Strategy Plan 2026-2031. For strategic goals, we agree with the core mandates of protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment. We think that Codex should clarify the scopes of evolving global environment and promoting an integrated approach to ensure that the focus is on the above-mentioned mandates. In our view, at present, Codex can address specific issue within its scope of work, such as recycled food packaging, sustainability labelling and claims, future food, new food production which are related to both environmental issues and food safety concerns.</p>	<b>Thailand</b>
<p>United Arab Emirates comments on CL-82/2024-CAC Request for comments on a proposal on the draft goals and outcome statements for the Codex Strategic Plan 2026-2031 On the light of the documentation provided by codex secretariat namely CX/EXEC 24/86/4 and the ANNEX I of the CX/EXEC 24/86/4, United Arab Emirates appreciates the modalities undertaken by the Codex Chairperson and vice chairpersons to collect members views on the strategic plan 2026-2031 mainly the informal regional consultations. In this regard, many of our proposals cited in response to CL 2024/10-EXEC were taken into consideration and especially the followings suggestions: 1)- the importance of focusing on the concept of sustainability at all stages of the food chain, including reducing food loss and waste to ensure the preservation of resources and the environment and 2)- also the importance of the foresight and keeping pace with rapid changes in the field of food and nutrition, which leads to the development of proactive strategies and plans to identify and address emerging issues in advance of their occurrence. Adding to that 3)-Codex is encouraged to implement the One Health concept as agreed by the Quadripartite while dealing with food safety issues in the context of Codex work. Consequently, United Arab Emirates agrees with the strategic goals proposed by codex as well as the functional goal related to the enhancement of the work management systems and practices that support the efficient and effective achievement of all strategic plan goals. United Arab Emirates aspire for integrative and concluding discussions during CAC47.</p>	<b>United Arab Emirates</b>
<p>The UK suggest the addition of the following sentence under a new bullet point: 'Consumers are enabled to make informed choices by the clear provision of appropriate information.'</p>	<b>United Kingdom</b>
<p>The United States appreciates the work that has gone into the development of these draft strategic goals and the opportunity to respond to this Circular Letter. The United States is generally supportive of the draft strategic goals and believes that with further discussion around a few minor areas for refinement the Strategic Plan 2026-2031 will be able to be finalized at the upcoming sessions of CCEXEC and CAC. The United States has included specific comments and suggested edits below for consideration.</p>	<b>USA</b>
<p>The following are the combined comments of these organizations developed and submitted jointly: AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition We thank CCEXEC and CAC for the opportunity to provide input and consideration of our comments.</p>	<p><b>AOAC INTERNATIONAL</b> <b>European Federation of the Associations of Dieticians</b> <b>International Life Sciences Institute</b> <b>NSF International</b> <b>Institute of Food Technologists</b> <b>American Society for Nutrition</b></p>

<p>The aims within the document are valid and appropriate. The problem is that it is difficult to ensure appropriate people are involved in the committees, in terms of the range of representation of countries, knowledge and practise.</p>	<p><b>ICUMSA</b></p>
<p>IBFAN/ENCA comment on DRAFT STRATEGIC GOALS AND OUTCOME STATEMENTS FOR THE CODEX STRATEGIC PLAN 2026-2031, AS PROPOSED BY CCEXEC November 2024</p> <p>ENCA IBFAN comments advocating that Codex strengthen its conflict of interest safeguards and processes for adopting standards in order to meaningfully help the transformation of the food system that is doing so much harm to human and planetary health.</p> <p>“...you meet at a time of unprecedented challenges. Conflicts and climate change are exacerbating food insecurity and malnutrition. Most people around the world who have access to food cannot afford healthy diets. Deforestation and habitat loss are increasing the risk of zoonotic pathogens. Anti-Microbial Resistance, environmental contamination and degradation, occupational hazards, unsafe and adulterated foods – the list goes on. A transformation of the world’s food systems is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet. The Codex Alimentarius has a critical role to play in guiding country regulations that promote health, while facilitating fair trade. WHO remains committed to working with FAO to develop and deliver high quality scientific advice and evidence-based global food safety guidelines and standards.” Dr Tedros Adhanom Ghebreyesus, WHO Director-General</p> <p>Background: The International Baby Food Action Network (IBFAN) is a 45 year old global network of over 300 citizens groups in over 100 countries, working to protect mothers and children from harmful marketing practices. IBFAN welcomes the opportunity to comment on this important work to develop a new Codex Strategic Plan 2026-2031. As Dr Tedros Adhanom Ghebreyesus outlined, there is an urgent need for a transformation of the world’s food system to meaningfully address its disastrous impact on human health and the environment. Marketing restrictions on the production and trade of ultra-processed (UPFs) plastic-wrapped and additive-laden products could make a significant contribution.</p> <p><b>Strategic Goals</b> Respond to Members’ needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards</p> <ul style="list-style-type: none"> <li>• Foresight and horizon-scanning activities are used to support the identification of Members’ needs and emerging issues in an evolving global environment.</li> <li>• Scientific advice that addresses the needs identified by CAC and subsidiary bodies is provided by FAO and WHO and the joint FAO/WHO scientific expert advisory bodies, informed by globally representative data and appropriate international expertise.</li> <li>• Scientific advice is used by CAC and subsidiary bodies in line with Codex risk analysis principles.</li> <li>• Codex standards and related texts are developed, reviewed and adopted in a timely manner.</li> </ul> <p>IBFAN comment on the Strategic Goal:</p>	<p><b>IBFAN / ENCA</b></p>

The protection of the health of consumers is a very important goal, that will need to be reiterated by Codex chairs at the start of all Codex Committees – perhaps also at the start of each session or topic. The protection of the health of consumers is easily overshadowed by the facilitation of trade.

All too often harmful compromises are made because Codex decisions are based on political or commercial expedience rather than on relevant, convincing and credible evidence.

Foresight and horizon-scanning activities will certainly be needed if Codex is to follow a 'One Health' approach – as we strongly urge it does. However, meaningful protection of human and planetary health will require meaningful changes to the way that Codex standards and texts are adopted. In our experience, few texts are adopted on the basis of relevant, independent and convincing evidence and too many decisions are taken on the basis of commercial and political expedience.

It will clearly not be an easy task to meaningfully consider the protection of human, animal and planetary health, traditional food cultures and bio-diversity – while minimising reliance on Ultra Processed foods, deforestation, mono-cropping and land-grabbing.

Scientific advice - the need to strengthen Conflict of interest safeguards

We strongly support the need for Codex to follow WHO and FAO scientific advice. In line with the Codex Procedural Manual that in Paras 12, 35 etc states that: “The needs and situations of developing countries should be specifically identified and taken into account by the responsible bodies in the different stages of the risk analysis.” While we support the need for “globally representative data and appropriate international expertise”, it is important that such scientific data is credible and free from commercial influence.

In IBFAN's long experience, Codex decisions are rarely based on relevant, convincing and credible evidence of the risks to health in these countries, but on politically influenced consensus. In CCNFSDU Codex has for many years relied on scientific advice from European-based health professional associations with little experience of developing world, who are also substantially compromised by food industry funding. This has led to the weakening of key standards in critically important areas.

Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges

- The mutual understanding of the roles of CAC and relevant international organizations in relation to global challenges is improved and is supported by ongoing consultation between the parties.
- Gaps in approaches to addressing global challenges are identified through targeted engagement with relevant international organizations.
- The contribution of CAC to the transition towards sustainable and resilient food systems, is identified, and the development of relevant Codex texts undertaken accordingly.
- The use of Codex texts in the context of integrative approaches such as One Health is promoted.

IBFAN/ENCA Comment

We strongly support engagement of relevant international organisations and an integrated approach.

Codex terminology should be consistent across all committees and based on sound independent science and clear procedures. One example of potential harm is the meaningless Industry term – ‘established history of apparently safe use’ This term appears four times in the Infant Formula and Follow-up Formula Standard opens the door for producing industries to maintain untested/unsafe ingredients in these products. It should be removed.

Maximize the impact of Codex by increasing the visibility and use of standards

- The profile and recognition of Codex as the international food standards setting body for protecting consumer health and ensuring fair practices in food trade is enhanced.
- Contributions from relevant international organizations are encouraged throughout the development of Codex standards.
- Harmonization through the increased use of Codex texts in establishing national food control systems, standards and regulations is advocated for.
- Codex Members and Observers are enabled to participate actively and sustainably throughout the standard-setting process.

IBFAN ENCA could only support the above section if the standard setting process is transformed (in line with our suggestions) and if standards that do not are not fit for purpose are revoked. Codex will be stronger, more effective and better respected if time is allowed for open discussion about the long-lasting , global impact of standards that conflict with the recommendations of the World Health Assembly – the world’s highest health policy-setting body.

Badly formulated standards that fail to incorporate WHA recommendations are used by industries and exporting countries in attempts to stop importing governments bringing in adequate marketing controls. When Codex standards are seen as the ‘regulatory ceiling’ for trade purposes, the fear of triggering costly, time-consuming challenges at WTO and elsewhere has a chilling effect on policy-making. This leads to a reduction in child protection and increased risks to child health and survival – the opposite of what Codex is supposed to be for. The phrase – ‘don’t let the perfect be the enemy of the good’ should not be used to rush bad texts through

Codex Members and Observers are enabled to participate actively and sustainably throughout the standard-setting process - suggestions for changes in the Procedural Manual

IBFAN/ENCA Comment. In the Codex Committee on Nutrition (for IBFAN one of the most important committees) transnational food industry representatives comprise 70% of non-state observers (without voting rights) and 28% of the member state delegations (with voting rights), greatly outnumbering independently funded civil society groups. These industries fund Codex dinners, receptions, meetings and even national Codex contact points. The Codex Procedural Manual should set stricter rules regarding such commercial influence.

Participants list To facilitate discussion, it would helpful if the list of all registered Participants – albeit in draft form – could be made available at the beginning of each the meeting. IBFAN and ENCA have highlighted the fact that food industry delegates often sit on government delegations, and on occasion lead delegations. Given the importance of Codex texts, at the very least, a caution could be placed in the Procedural Manual.

Codex Trust Fund In order to safeguard to participation of participants from developing countries, the Procedural Manual should state that the Code Trust Fund will be publicly funded and that contributions from the private sector are prohibited.

#### Functional goal

Enhance work management systems and practices that support the efficient and effective achievement of all strategic plan goals

- Effective and efficient Codex work management practices are refined and enhanced, exploiting digital and other new technologies to enable this.
- Proposals to CAC for development of new Codex texts are prioritized in relation to their impact on protecting consumer health and ensuring fair practices in food trade.
- Chairpersons and delegates are supported in their respective roles and their capabilities are developed.

Comment on Functional Goal: We welcome the moves to improve Codex management practices, increasing accessibility and participation of members and observers remotely. We see the participation of independent public health NGOs as an integral and essential part of Codex that should be recognised and enhanced in the new Strategic Plan. For transparency, we strongly urge that all Codex sessions are web-streamed and where possible hybrid. Also we would argue that there is clear need for the recordings to be kept on the Codex website – at the very least for the whole time that a standard for guideline is being discussed. The Committee reports are never a full and accurate record of proceedings that have huge political impact. Everyone attending Codex meeting is surely there as a representative of their institution.

Prioritisation IBFAN/ENCA was pleased that CCNFSDU in Dresden, properly tested the new draft prioritising system. Codex members and observers spent a day assessing and scoring the impact new work proposals might have, not only on trade, but on global public health and food safety. CCFL spent far less time on prioritisation and the overarching mandate of Codex to Protect Consumer Health was hardly mentioned, and on occasion questioned whether the word health was beyond the remit of Codex!

IBFAN wholeheartedly welcomes the Prioritisation mechanism and believes that it can be strengthened over time to include One Health. If it had been in place in 1987, the Follow-up formula Standard might not have been adopted. This standard contained little or no safeguards and legitimized and fuelled the growth of a global market for these needless and ultra-processed products. The standard has been a major factor in the undermining of legislation to protect breastfeeding.

Climate emergency: Codex is in a key position to reduce the undermining of bio-diversity, traditional food cultures, deforestation, mono-cropping, and the land and sea-grabbing that is doing so much harm to human and planetary health. It must support the Global Plastics Treaty, starting by adopting texts that will help governments limit the promotion and global trade of plastic packaged ultra-processed products. Globally traded 'plant-based' ultra-processed products and poorly controlled sustainability claims are not the solution to the climate crisis. Codex must ensure that the protection of breastfeeding and bio-diverse family foods is the most environmentally friendly way to feed an infant resulting in zero waste, minimal greenhouse gases, and negligible water footprint.

WPHNA Comments in response to CL 2024/82 CAC- Request for comments on a proposal on the draft goals and outcome statements for the Codex Strategic Plan 2026-2031

The World Public Health Nutrition Association (WPHNA) would like to take this opportunity to thank the CCEXEC for its collaborative efforts in the development of the Codex Strategic Plan 2026-2031. WPHNA is glad to be a part of the conversation about how Codex standards on food safety, quality, and nutrition can advance broader objectives like sustainability, food security, and planetary health. We echo the points raised by IBFAN and ENCA.

Codex has aimed to protect consumer health and promote fair practices in food trade. Unfortunately, the widespread global trade of predominantly ultra-processed foods and beverages (UPFs), standardized by Codex, has often resulted in the prioritization of trade goals at the expense of human and planetary health. This has also contributed to the growing power and influence of the agri-food industry, which has successfully leveraged Codex guidance to protect their commercial interests at any cost, disregarding their harm to the environment and traditional healthy food systems. The shift toward monoculture farming and the extensive use of herbicides and fertilizers have led to significant biodiversity loss and soil degradation. Additionally, large-scale industrial agriculture often results in deforestation and habitat destruction, further threatening the environment and amplifying the risk of displacement. Traditional food systems, which rely on diverse crops and ancestral knowledge, are increasingly marginalized as corporate interests promote UPF consumption. These trends not only diminish cultural heritage and food sovereignty but also compromise the nutritional quality of diets, contributing to the burden of disease and mortality among communities that once thrived on locally sourced, diverse foods. Not to mention the close link between UPFs and growing reliance on single-use plastics which increasingly pollute our landfills and oceans.

To balance the scales and prevent further undue influence of the industry in Codex processes, we urge the CCEXEC to implement robust mechanisms to safeguard against conflicts of interest (COI) that might continue to undermine global efforts to protect human and planetary health. We believe it is crucial to increase the transparency of Codex practices to ensure that this entity achieves its mission to protect consumer health.

If these significant issues are not addressed moving forward, we risk perpetuating harm to public health and the environment, leaving the population and our planet at the mercy of corporate greed and the trade interests of powerful exporting nations. Health-harming corporations thrive on unrestricted trade while avoiding accountability for the vast negative impacts of their practices. Consequently, the burdens of poor health outcomes and environmental degradation are disproportionately borne by resource-constrained governments, vulnerable populations, and the environment, rather than those directly profiting from these activities.

WPHNA is of the view that the following suggestions must be recognized by Codex and integrated into the Procedural Manual to protect the global food system and the environment:

**World Public Health Nutrition Association**

**SPECIFIC COMMENTS**

<b>COMMENT</b>	<b>MEMBER / OBSERVER</b>
Please ensure consistency in the use of terms, especially with regard to "CAC" and "Codex".	Indonesia
<p><b>The Codex Alimentarius Commission commits itself to work towards achievement of the following Strategic and Functional Goals within the Codex purpose<sup>1</sup>:</b></p> <p>The comments below are in addition to those sent previously on the Strategic Plan Part 1:  <a href="https://www.babymilkaction.org/wp-content/uploads/2023/09/FINAL-ENCA-response-Codex-strategic-plan-Patti-without-track-changes-ES.pdf">https://www.babymilkaction.org/wp-content/uploads/2023/09/FINAL-ENCA-response-Codex-strategic-plan-Patti-without-track-changes-ES.pdf</a></p>	IBFAN / ENCA
<p><b>The Codex Alimentarius Commission commits itself to work towards achievement of the following Strategic and Functional Goals within the Codex purpose<sup>1</sup>:</b></p> <p>The MSEU note that the Statutes of the Codex Alimentarius Commission, included its purpose, as well as the procedures that are relevant for the functional goal are established in the Procedural Manual. The purpose of the Strategic Plan is to provide short- to medium-term Strategic objectives that are complementing the Procedural Manual. It may thus not be needed to indicate in the Strategic Plan that Codex will work in accordance with the Procedural Manual.</p>	European Union
<p><b>The Codex Alimentarius Commission commits itself to work towards achievement of the following Strategic and Functional Goals within the Codex purpose<sup>1</sup>:</b></p> <p>We would like to propose deleting footnote2 in the Chapeau and replacing with five purposes of Codex that are stated in the Article 1 from Codex Procedural Manual.</p>	Thailand
<p><b>Respond to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards</b></p> <p>The protection of the health of consumers is a very important goal, that will need to be reiterated by Codex chairs at the start of all Codex Committees – perhaps also at the start of each session or topic. The protection of the health of consumers is easily overshadowed by the facilitation of trade.</p> <p>We welcome the opportunity to comment on this important work to develop a new Codex Strategic Plan 2026-2031. As Dr Tedros Adhanom Ghebreyesus outlined, there is an urgent need for a transformation of the world's food system to meaningfully address its disastrous impact on human health and the environment. Marketing restrictions on the production and trade of ultra-processed (UPFs) plastic-wrapped and additive-laden products could make a significant contribution.</p>	IBFAN / ENCA



<p><b>Respond to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards</b></p> <p>Canada fully supports this strategic goal, noting that it covers the bulk of Codex work. Canada continues to support the need for sustainable funding of scientific advice, and believes Codex has a role in promoting this. We suggest that consideration be given to including this point under the strategic goal.</p>	<p><b>Canada</b></p>
<p><b>Respond to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards</b></p> <p>The United States recommends deleting this clause as it is specific only to the first bullet of this strategic goal. The overarching strategic goal should be relevant to all outcome statements.</p>	<p><b>USA</b></p>
<p><b>Respond to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards</b></p> <p>Respond to members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global by developing members' participation and their harmonization in elaboration of science-based standards</p>	<p><b>Iran</b></p>
<p><b>Respond to Members' needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards</b></p> <p>1. Decisions must be protected from commercial influence and based on relevant and sound scientific evidence that is free of COI:  Decisions made by Codex are frequently influenced more by political consensus than by credible evidence on public health. The growing presence of industry allies and their influence on decision-making poses serious threats to the integrity of Codex processes. This is particularly evident in the Nutrition Committee (CCNFSDU), where over 40% of delegates represent the food and related industries. These corporations participate actively in government delegations, often outnumbering legitimate government representatives in discussions. Moreover, government delegations usually lack adequate representation from health ministries, and there is often no involvement from environmental ministries.  Of particular concern is the common industry practice of funding research that aligns with its own interests, creating a clear COI that undermines public health and distorts sound scientific discourse. Another source of concern is the barriers faced by low-income countries to participating in Codex meetings, limiting their ability to participate in these processes and voice their concerns and interests, which in turn affects the relevance and impact of the guidelines issued by Codex; this often forces these countries to rely on external funding that frequently comes from industry sources, further entrenching their influence in Codex processes. This underscores the urgent need to ensure that Codex decisions are grounded in robust scientific evidence, free from commercial influence, to protect public health and uphold integrity in food standards.</p> <p>2. Codex should adopt stricter transparency and conflict of interest safeguards:  It is imperative that Codex implements stricter transparency and COI safeguards, developed with careful consideration and collaboration among Member States, particularly regarding the role of science in the decision-making process. We would like to emphasize the need to implement processes and mechanisms that actively protect decision-making from</p>	<p><b>World Public Health Nutrition Association</b></p>

<p>undue commercial influence. However, it is just as important to ensure that the participation of expert, legitimate civil society organizations is not hindered, as excluding these voices could lead to ill-informed policies, especially concerning public health, nutrition, and consumer protection.</p> <p>While important steps have been taken to increase transparency, such as the recent decision to allow webcasting of the CCFSDU meetings, we urge Codex to recognize the need for increased means for transparency. WPHNA supports the proposal of other civil society organizations to provide transcripts of Codex meetings and proceedings, with a clear paper trail of which actors contributed to decision-making. Additionally, we consider that it is critical to prevent Member States from including health-harming industries and their allies in their government delegations, as this grants these entities unregulated access to high-level policymaking. Moreover, it is essential to include warnings in the Procedural Manual that inform governments about the detrimental impacts of treating these industries as legitimate partners in health and food safety initiatives. We cannot emphasize enough the imperative need for greater transparency and the implementation of safeguards against COI and undue commercial influence.</p>	
<p><b>Foresight and horizon-scanning activities are used to support the identification of Members' needs and emerging issues in an evolving global environment.</b></p> <p>Foresight and horizon-scanning activities will certainly be needed if Codex is to follow a 'One Health' approach – as we strongly urge it does. However, meaningful protection of human and planetary health will require meaningful changes to the way that Codex standards and texts are adopted. In our experience, few texts are adopted on the basis of relevant, independent and convincing evidence and too many decisions are taken on the basis of commercial and political expedience.</p> <p>It will clearly not be an easy task to meaningfully consider the protection of human, animal and planetary health, traditional food cultures and bio-diversity – while minimising reliance on Ultra Processed foods, deforestation, monocropping and land-grabbing.</p>	<p><b>IBFAN / ENCA</b></p>
<p><b>Foresight and horizon-scanning activities are used to support the identification of Members' needs and to address emerging and critical issues that impact food safety and quality in an evolving global environmentlandscape.</b></p> <p>The United States suggests these edits to provide clarity to the outcome statement which is focused on forward-looking emerging and critical issues. To avoid ambiguity or confusing this outcome statement with emerging issues specific to the environment, the United States suggests replacing “environment” with “landscape” which more broadly encompasses all emerging issues arising from an evolving world.</p>	<p><b>USA</b></p>
<p><b>Foresight and horizon-scanning activities are used to support the identification of Members' needs and emerging issues in an evolving global environment.</b></p> <p>Recommend that a structured and transparent process for food systems foresight/horizon scanning be developed by a CC EXEC chartered Codex working group and tied to the existing FAO foresight/horizon scanning efforts. The horizon scanning process should include both identification of emerging issues and data collection methodologies to inform existing priorities. The process should be enabled by Member countries and a subset group of observer organizations' own foresight/horizon scanning efforts (Academic/Scientific/Industry). The Codex process should proactively solicit input (e.g., periodic surveys, calls for data) and be facilitated by a mechanism similar to Circular Letters (e.g., route proposed foresight areas for review by Codex participants to enable transparency).</p>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>

<p>Such an effort would need early engagement (generally, prior to Member national initiatives being implemented), in order to avoid local/regional precedent setting based on solely local/regional data assessment. The foresight/horizon scanning effort would also need to be broader than the current FAO approach, which is focused on food safety and does not take into account nutrition or trade issues that are significant to Codex Members. The foresight/horizon scanning effort should be connected to an upgraded, harmonized, cross Codex Committee approach to prioritization of Codex Committee activities that both account for emerging foresights, global consensus Member needs, and optimally leverage constrained Codex resources/effort areas within Committees. The prioritization process should involve consensus building similar to the Circular Letter process and be guided by CC EXEC.</p>	
<p><b>Foresight and horizon-scanning activities are used to support the identification of Members' needs and emerging issues in an evolving global environment.</b></p> <p>The United Kingdom suggest the addition of the following at the end of this bullet point: '...and to address global challenges such as lack of food security, biodiversity loss and climate change.'</p>	<p><b>United Kingdom</b></p>
<p><b>Foresight and horizon-scanning activities <u>based on available scientific evidence and other relevant information</u> are used to support the identification of Members' needs and emerging issues in an evolving global environment.</b></p> <p>Japan suggests adding "based on available scientific evidence and other relevant information" for foresight and horizon-scanning activities. Japan is of the view that a thorough review of available scientific evidence and other relevant information should be taken for the identification of Members' needs and emerging issues.</p>	<p><b>Japan</b></p>
<p><b>Scientific advice that addresses the needs identified by CAC and subsidiary bodies is provided by FAO and WHO and the joint FAO/WHO scientific expert advisory bodies, informed by globally representative data and appropriate international expertise.</b></p> <p>We strongly support the need for Codex to follow WHO and FAO scientific advice. In line with the Codex Procedural Manual that in Paras 12, 35 etc states that: "The needs and situations of developing countries should be specifically identified and taken into account by the responsible bodies in the different stages of the risk analysis." While we support the need for "globally representative data and appropriate international expertise", it is important that such scientific data is credible and free from commercial influence.</p> <p>In IBFAN's long experience, Codex decisions are rarely based on relevant, convincing and credible evidence of the risks to health in these countries, but on politically influenced consensus. In CCNFSDU Codex has for many years relied on scientific advice from European-based health professional associations with little experience of developing world, who are also substantially compromised by food industry funding. This has led to the weakening of key standards in critically important areas.</p>	<p><b>IBFAN / ENCA</b></p>

<p><b>Scientific advice that addresses the needs identified by CAC and subsidiary bodies is provided by FAO and WHO and the joint FAO/WHO scientific expert advisory bodies, informed by globally representative data and appropriate international expertise.</b></p> <p>Conduct a review with WHO/FAO of the support provided for scientific expert assessments, with a particular focus on JECFA. It is our perspective that JECFA is overloaded with requests for work, forcing many of the committees to prioritize requests and delay work, and that this is hindering the timely progress of Codex committee work. It is recommended that WHO/FAO work with Codex to split JECFA activities into two expert bodies supported by additional capacity/funding to better enable the progress of the committees. JECFA originated in the 1950's and has been a very successful activity of the UN in support of Codex, but its remit has expanded significantly over the six decades of Codex work. Our recommended approach would be to create and fund capacity for these two expert bodies:</p> <p>i. A Joint Expert Committee whose focus is solely on Food Additives, Processing Aids and Packaging Materials (i.e., direct and indirect food additives).</p> <p>ii. A joint Expert Committee whose focus is solely on Natural and Synthetic Contaminants and Veterinary Drugs.</p> <p>iii. By creating these two scientific bodies with refined areas of focus, we believe Codex would be enabled to more efficiently and effectively conduct the numerous food safety assessments to address the challenges facing the global food supply chain.</p>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>
<p><b>Scientific advice that addresses the needs identified by CAC and subsidiary bodies is <del>provided by FAO-based on up-to-date methodology</del> and WHO and the joint FAO/WHO scientific expert advisory bodies, informed by globally representative data and appropriate international expertise.</b></p> <p>The MSEU welcome this strategic goal that reflects Article 1, paragraphs 1.a and 1.e of the Statutes. In addition to the importance of globally representative data, the MSEU suggest to highlight the need to rely on up-to-date methodology. There is no need to refer to how the scientific advice is organised in Codex since it is established in the Procedural Manual.</p>	<p><b>European Union</b></p>
<p>Scientific advice is used by CAC and subsidiary bodies in line with Codex risk analysis <del>principles</del><u>principles when developing standards.</u></p>	<p><b>Canada</b></p>
<p><b>Scientific advice is used by CAC and subsidiary bodies in line with Codex risk analysis principles.</b></p> <p>Development of globally harmonized food safety risk assessments and guidance on data interpretation procedures, inclusive of nutritional risks and based on reliable data using validated, fit-for-purpose methods of analysis, leveraging an expanded list of CCMAS recommended methods to address the broader risk territories.</p> <p>Specifically, we recommend:</p> <ul style="list-style-type: none"> <li>• Developing codes of practice or guidance for Member countries to use to help guide them in conducting risk assessments and data interpretation procedures to drive global harmonization of such assessments and procedures, inclusive of food safety and nutrition, thereby enhancing global food security. Build them off the existing Joint Expert Committee food safety risk assessment models that are already well accepted by Members. It is recommended that a Codex working group be established in concert with FAO/WHO expertise and potentially leveraging a team of global,</li> </ul>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>

<p>external expert partnerships.</p> <ul style="list-style-type: none"> <li>Expanding the list of methods in CXS 234-1999 to analytes that do not have established provisions in Codex standards (yet) but are relevant and important for food safety and nutrition risk assessment activities, such as emerging contaminants or new nutrients/additives/ingredients.</li> </ul>	
<p><b>Codex standards and related texts are developed, reviewed and adopted in a timely manner.</b></p> <p>Codex terminology should be consistent across all committees and based on sound independent science and clear procedures. One example of potential harm is the meaningless Industry term – ‘established history of apparently safe use’ This term appears four times in the Infant Formula and Follow-up Formula Standard opens the door for producing industries to maintain untested/unsafe ingredients in these products. It should be removed.</p>	<p><b>IBFAN / ENCA</b></p>
<p><b>Codex standards and related texts are developed, reviewed and adopted in a timely manner.</b></p> <p>Emphasizing on authenticity of food products, especially agricultural products, preventing the lack of transparency in identification of food source and origin, in order to protect the consumer rights and support fair trade</p>	<p><b>Iran</b></p>
<p><b>Codex standards and related texts are developed, reviewed and adopted in a timely manner.</b></p> <p>We recommend that Codex create a set of Key Performance Indicators (KPI's) or metrics that are evaluated by CC EXEC regularly (e.g., every 2 years) and reviewed at CAC on that frequency to continuously improve Codex standards &amp; guidance, the text development process, and review of existing standards and guidance.</p>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>
<p><b>Fortalecer las relaciones con organizaciones internacionales pertinentes, promoviendo un enfoque integrado para afrontar los desafíos globales</b></p> <p>Costa Rica propone la siguiente rfedacción: Fortalecer las relaciones con organizaciones internacionales pertinentes, promoviendo un enfoque integrado para afrontar los desafíos globales respetando estrictamente el alcance y mandato de cada organización.</p> <p>Justificación: Este enfoque proporcionará una orientación clara a la Comisión del Codex Alimentarius (CAC), sus órganos asociados y a los países miembros, para asegurar que solo se aborden aspectos alineados con las competencias y el mandato del Codex.</p>	<p><b>Costa Rica</b></p>

<p><b><u>Fortalecer las relaciones-Identificar, mediante intercambios regulares, posibles deficiencias en la acción coordinada con las organizaciones internacionales pertinentes, promoviendo un enfoque integrado pertinentes para afrontar-abordar los desafíos globales.</u></b></p> <p>Comentario: Muchos de los organismos a los que se hace referencia participan como observadores en el CODEX. En el eventual caso que surja una situación que exija una mayor coordinación entre los organismos involucrados existen las vías de comunicación necesaria para ello. En caso de que algún organismo desee participar como observador el procedimiento esta establecido en el Manual de Procedimiento. Asimismo, el CODEX tiene técnicos afectados específicamente a la coordinación con otros organismos. Redacción propuesta: "Identificar, mediante intercambios regulares, posibles deficiencias en la acción coordinada con las organizaciones internacionales pertinentes para abordar los desafíos globales".</p>	Uruguay
<p><b>Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges</b></p> <p>We strongly support engagement of relevant international organisations and an integrated ONE HEALTH approach.</p>	IBFAN / ENCA
<p><b>Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges</b></p> <p>Canada notes that this goal and related outcomes are new, and finds it difficult to support the proposed goals and outcomes without understanding the related activities and indicators and responsible party for the delivery of activities.</p>	Canada
<p><b>Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges</b></p> <p>Strengthen relationships with relevant international organizations, promoting an integrated approach, and expanding members' participation practices to address global challenges</p>	Iran
<p><b>Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges</b></p> <p>1. Codex must prioritize caution when establishing safety, ingredient, and labeling standards for all UPFs, placing greater emphasis on the health and environmental impacts of food processing: The extended shelf life required for global food trade often leads to ultra-processing, and the associated harms of these products are becoming increasingly acknowledged.<sup>1,2</sup> The existing evidence on the negative effects of UPFs on human and planetary health should be enough to prompt a fundamental reassessment of Codex priorities. Given the mounting data linking UPF consumption to adverse health outcomes and environmental degradation, Codex should consider adjusting its priorities to emphasize health and sustainability. While trade remains a key aspect of the Codex mission, its increasing impacts on health and sustainability suggest that these areas may deserve greater attention. Continuing to place trade on the same level as health and environmental protection is no longer tenable—the stakes are simply too high. To safeguard public health and protect the environment, Codex must adopt a more health-centric approach that actively mitigates the harms associated with UPFs.</p> <p>2. The environmental impact of the food system must be central:</p>	World Public Health Nutrition Association

The irrefutable evidence of the environmental damage caused by the global trade of unnecessary, plastic-wrapped, denatured, UPFs should also compel a fundamental reassessment of Codex priorities. With increasing awareness of the adverse effects of food production on greenhouse gas emissions, climate change, biodiversity, human rights, agricultural land protection, and animal welfare, Codex must also prioritize environmental sustainability alongside public health.<sup>3,4</sup> WPHNA is of the view that treating trade and environmental considerations as equally important risks perpetuating the negative impacts of trade on planetary and human health while allowing corporations to operate without accountability for the harms they cause. Therefore, Codex efforts must be grounded in human rights principles, including the right to adequate food. Codex principles should not overlook existing public health and environmental problems that require attention such as plastic pollution, water contamination, and pesticide harm, nor should they undermine food security or the protection of traditional agriculture and food production that are key for some minorities' subsistence. These principles must protect population health over the trade interest of health- and environmental-harming corporations. We support civil society organizations and scientific groups calling for strong binding mandates to reduce plastic pollution in the Plastic Treaty, which Codex must adhere to within the scope of its responsibilities.

### 3. Sustainability Labeling:

WPHNA agrees that Codex must address the global impact of food production and trade on climate change, biodiversity, and sustainability. However, WPHNA is concerned that the current proposal for sustainability labeling will be counterproductive, potentially leading to increased greenwashing of health-harming UPFs, the products that have the most detrimental impact on the environment. This approach risks providing another avenue for marketing these products, expanding their market share rather than genuinely promoting sustainable practices. These strategies of marketing used to increase sales have been evident before, with the use of health claims, which have been found to increase consumption<sup>5</sup> and which often are not backed by sound scientific evidence and are invariably deceptive. Moreover, the stocktake produced in response to CL2022/12FL showed that more than 80% of sustainability labels already implemented were privately owned, 66% were verified by a nonstate third party, and only 12% were verified by government and/or public institutions. Thus, the absence of government regulation and independent monitoring of sustainability labeling, combined with the prevalence of food industry self-regulation is likely to result in counterproductive claims. This situation threatens human health by consuming unhealthy products and compromises planetary health by failing to address the environmental impacts of UPF production and trade.

WPHNA suggests that if national governments choose to allow sustainability labeling, warnings rather than claims should be prioritized, particularly for UPFs. Governments should also follow the following key principles, stated in Codex Guidelines:

1. Adequate, effective, legally binding, and independently monitored safeguards must first be in place to ensure that human and planetary health is not undermined by misleading claims.
2. The onus for reducing the impact of food systems on climate change should not be placed on consumers.
3. Governments' primary aim must be to protect and restore biodiversity, prevent the degradation of ecosystems and the wider environment, reduce the risks from emerging and re-emerging zoonotic epidemics and pandemics, and curb the silent pandemic of antimicrobial resistance.

The Independently verified impact of ALL the factors that contribute to food production and food consumption ("from farm to fork") should be used as criteria and they must include as a minimum:

- water consumption along the whole production chain
- source of ingredients - local or imported
- processing of ingredients

- processing of the final product
- environmental cost of the global supply chain
- global, regional, and national transportation
- packaging - plastics – microplastics, chemicals such as PFAs<sup>4</sup>
- labor practices
- animal health
- retailing, marketing, and promotion

We cannot emphasize enough the importance of Codex ensuring that any sustainability labeling is meaningful and not used by the industry as a marketing tool that obscures the actual environmental impacts of these products.

WPHNA proposes that any sustainability labeling must be regulated by the government with robust safeguards against COI and undue commercial influence.

WPHNA considers private/commercial/industry self-regulated and certified claims should not be permitted. Given how resource-intensive legislating, enforcing, monitoring, and substantiating these claims and warnings can be, sustainability labeling should not be permitted in countries where effective regulation is not feasible.

#### 4. Added sugars labeling:

WPHNA supports the work to define, and label added sugars and would like to emphasize the relevance of unhealthy sugar consumption, particularly among vulnerable populations such as children. Clear labeling of added sugars will empower consumers to make informed dietary choices and contribute to efforts aimed at reducing obesity and related non-communicable diseases.

The various forms of mono- and disaccharides, syrups and concentrated fruits, as well as other food concentrates and high-sugar ingredients like jams and chocolate, should all be considered "added sugars." This distinction is essential to separate them from naturally occurring sugars found in otherwise nutritious foods.

To fulfill its mandate of protecting consumer health, Codex guidance must promote clear and comprehensive labeling of added sugars in food products. Consumers have a right to clear and accurate information about the products they consume. Ensuring that the quantity of added sugars is clearly disclosed is essential for empowering consumers to make informed purchasing choices. Transparency in nutrition information is fundamental to protecting consumer rights and fostering healthier diets. Moreover, a clear breakdown of all the various forms of added sugars (as a percentage of added sugar by weight in the ingredient list and as a sub-total of total sugars in the nutrient declaration panel) is key to aligning with national and WHO recommendations for daily total added and free sugar consumption limits. The consumption of processed foods containing significant amounts of added sugars often displaces healthier options such as whole grains, fruits, and vegetables, contributing to a decline in public health and increasing the risk of diet-related diseases and mortality.

WPHNA believes that clear "added sugars" labeling should be mandatory, both in the nutrient declaration and as a percentage in the ingredient list. Providing comprehensive information on food labels is crucial for the protection of human health.

First, products designed for infants and young children, such as cereal-based foods and drinks, often contain added sugars that contribute to "empty calories." This undermines their nutritional intake during critical growth stages, leading to obesity and diet-related diseases. Additionally, sweetened foods can create lasting preferences for sugary items, impacting dietary habits into adulthood. <sup>6</sup>

Second, the marketing and consumption of sweetened foods for children contribute to malnutrition, manifesting as both obesity and undernutrition. From 1990 to 2018, the consumption of sugar-sweetened beverages (SSBs)



<p>increased by 16% across 185 countries, with reports indicating a much higher rate of global soft drink consumption in certain areas of the globe.<sup>7,8</sup> It is critical to address the role of SSBs on global sugar consumption, as these products are the leading source of free sugars in diets.</p> <p>Defining and mandating “added sugars” on labels will allow countries to implement excise taxes on SSBs, ultimately reducing their consumption. This definition may also pave the way for compositional restrictions, such as potentially prohibiting added sugars in infant foods and promoting gradual reductions in other products.</p> <p>Moreover, Codex must consider the implications of non-sugar sweeteners (NSS), such as aspartame, sucralose, and many more. The 2023 WHO Guidelines recommend against using NSS for weight management or reducing disease risk.<sup>9</sup> Studies indicate that NSS consumption during pregnancy is linked to a 25% increase in premature birth risk and has been associated with higher body weight, type 2 diabetes, cardiovascular disease, and increased mortality in the general population.<sup>10</sup> Therefore, Codex guidance must encourage the clear inclusion of these health risks on the labels of NSS-containing products.</p> <p>5. Safeguards for Products in Emergencies:          WPHNA is opposed to the CCFL's proposal for flexible labeling for food aid provided in emergencies. Flexible labeling and flexible nutrient and ingredient content will fail to protect the health of vulnerable populations. Individuals in these circumstances are more susceptible to illness and malnutrition, which calls for heightened precautions to ensure clear, safe, and accurate labeling. Codex standards and guidelines for emergencies must ensure that populations facing food insecurity receive the same rigorous labeling and nutritional information as all populations, with a focus on accurate and clear information of the nutrient content, safe preparation, storage, and handling. It is also imperative that Codex standards explicitly establish robust protections against commercial exploitation in emergency management decisions.</p> <p>6. Strengthen Food Safety safeguards and protect decision-making from commercial influence:          WPHNA concurs with other civil society organizations that Codex must strengthen its efforts to promote global food safety by including specific provisions that safeguard breastfeeding and promote optimal complementary feeding by urging governments to implement the International Code of Marketing of Breastmilk Substitutes, along with subsequent World Health Assembly resolutions on infant and young child feeding. Irresponsible promotion of formula feeding products poses significant threats to global food safety, as these products have been linked to contamination risks from heavy metals and other harmful contaminants, microbial risks related to Salmonella species, Clostridia spores, and more. Not to mention, the significant nutritional deficiencies of these products, which are unable to replicate the complex composition of breast milk, hinder the proper growth and development of infants.</p>	
<p><b>Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges</b></p> <p>We support strengthening cooperation between Codex and other relevant international organizations to avoid duplication of Standards developed in the same area and ensure that Codex Standards and related texts still focus on the above-mentioned mandates. In addition, we are of the view that Codex can promote an integrated approach to address global challenges through establishing food safety standards.</p>	<p><b>Thailand</b></p>

<p><b>Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges</b></p> <p>Egypt agrees with this goal and suggests linking it to the achievement of the SDGs , to be as follows "Strengthen relationships with relevant international organizations, promoting an integrated approach to address global challenges aligned with SDGs"</p>	Egypt
<p><b>The mutual understanding of the roles of CAC and relevant international organizations in relation to global challenges is improved and is supported by ongoing consultation between the parties.</b></p> <ul style="list-style-type: none"> <li>• Develop Codex mandate relevant intersection groups with other UN bodies by setting up interagency, multidisciplinary, collaborative, Member-based groups building upon the Codex model of Member country voluntary participation to coordinate efforts toward specific One Health initiatives for Codex, particularly expanding Codex type scientific risk characterization activities around a sustainable food supply and environment. Move beyond “international standards days” to applicational models and measuring results.</li> <li>• Recommend that Codex consider how to leverage existing work being done by standard development organizations on science-based food standards and to develop formalized approaches to leverage such scientific work.</li> </ul>	<p>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</p>
<p><b>The mutual understanding of the roles of CAC and relevant international organizations in relation to global challenges is improved and is supported by ongoing consultation between the parties.</b></p> <p>We noticed that the words of “CAC” and “Codex” are used interchangeably in this document. Therefore, we propose considering the appropriate use of both words by taking into account overall or specific work process to ensure a unified understanding.</p>	Thailand
<p><b>Se identifican las lagunas brechas en los planteamientos para abordar los retos mundiales mediante un compromiso específico con las organizaciones internacionales pertinentes.</b></p> <p>Sustituir la palabra mas adecuada en la traducción.</p>	Uruguay
<p><b>Gaps in approaches to addressing global challenges are identified through targeted engagement with relevant international organizations.</b></p> <p>Gaps in approaches to addressing global challenges are identified through facilitating members' participation practices and targeted engagement with relevant international organizations.</p>	Iran
<p><b>Gaps in approaches to addressing global challenges are identified through targeted engagement with relevant international organizations.</b></p> <p>Clearer definition of the meaning of “relevant international organizations” is needed, with organizations beyond UN based (WHO/FAO) being engaged. These engagements and the associated process to identify “relevant international organizations” should be transparent to the Codex community via a notification process.</p>	<p>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</p>

<p><b>Gaps in approaches to addressing global challenges are identified through targeted engagement with relevant international organizations. Contributions from relevant international organizations are encouraged throughout the development of Codex standards.</b></p> <p>This bullet talks about the contribution from relevant international organizations, it's judicious to displace it to this strategic goal</p>	Morocco
<p><b>En los casos que se identifique que la contribución del Codex es necesaria para hacer frente a los desafíos mundiales, se elaborarán los textos pertinentes en el ámbito del mandato del Codex. Se determina la contribución de la Comisión a la transición hacia sistemas alimentarios sostenibles y resilientes, y se emprende, en consecuencia, la elaboración de los textos pertinentes del Codex.</b></p> <p>Se sugiere modificar la redacción mas adecuada.</p>	Uruguay
<p><b>The contribution of CAC to ensuring food safety and fair practices in the food trade in the transition towards sustainable and resilient food systems, is identified, and the development of relevant Codex texts undertaken accordingly.</b></p> <p>The United States suggests this addition to ensure that the reference to Codex's contribution is clearly within the statutory purpose of Codex.</p>	USA
<p><b>The contribution of CAC to the transition towards sustainable and resilient food systems, is identified, and the development of relevant Codex texts undertaken accordingly.</b></p> <p>We recommend defining the critical Codex sustainability territories through the creation of a Codex Task Force to operate over a multi-year timeframe to clearly define with science the terms "sustainable and resilient food systems". Codex stakeholders &amp; regions have differing views currently regarding definitions of sustainability as it relates to Codex, and therefore will require substantial work by global Members and observers to help to reach a globally aligned, scientifically based definition.</p> <p>We encourage as a priority development of codes of practice and guidance around science-based approaches to a sustainable food system once it is properly defined by the recommended task force or other aligned approach.</p> <p>Specifically, we would focus on:</p> <ul style="list-style-type: none"> <li>• Losses due to spoilage by micro-organisms from poor storage practices (development of broad-based guidance across critical, prioritized food commodities either globally or regionally).</li> <li>• Food waste at consumer retail or food service locations (e.g., fresh produce loss reduction, damaged goods recovery methods, recovery and utilization of unused prepared food).</li> <li>• Food packaging (e.g., materials &amp; contaminants safety, life cycle assessments, sustainability information provided to consumers).</li> </ul>	<p><b>AOAC INTERNATIONAL</b>  <b>European Federation of the</b>  <b>Associations of Dieticians</b>  <b>International Life Sciences Institute</b>  <b>NSF International</b>  <b>Institute of Food Technologists</b>  <b>American Society for Nutrition</b></p>

<p>The contribution of CAC to the transition towards sustainable and resilient food <del>systems, systems</del> is identified, <del>and the development of relevant Codex texts undertaken accordingly.</del></p> <p>Japan suggests deleting “, and the development of relevant Codex texts undertaken accordingly”, as the development of Codex texts should be undertaken based on prioritized works within the purpose of the Codex. We also believe that consistency with the second outcome under the functional goal should be ensured.</p>	<p><b>Japan</b></p>
<p><b>The use of Codex texts in the context of integrative approaches such as One Health is promoted.</b></p> <p>One Health is taught and promoted</p>	<p><b>Iran</b></p>
<p><b>The use of Codex texts in the context of integrative approaches such as One Health is promoted.</b></p> <p>We recommend setting up UN interagency, multidisciplinary, collaborative, Member-based groups building upon the Codex model of the Member country &amp; Observer voluntary participation model to coordinate efforts toward specific One Health initiatives relevant to Codex, particularly expanding Codex type scientific risk characterization activities around a sustainable food supply and environment. Continue, but move beyond “international standards &amp; food safety days” to applicational models and measuring results.</p>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>
<p><b>The use of Codex texts in the context of integrative approaches such as One Health is promoted.</b></p> <p>The MSEU welcome this strategic goal that reflects Article 1, paragraphs 1.b, 1.c and 1.d of the Statutes. The MSEU highlight that increasing the coordination with other international organizations is critical to contribute to the transition to sustainable food systems and the One Health approach.</p>	<p><b>European Union</b></p>
<p><b>Maximize the impact of Codex by increasing the visibility and use of <u>Codex</u> standards</b></p>	<p><b>Canada</b></p>
<p><b>Maximize the impact of Codex by increasing the visibility and use of standards</b></p> <p>By increasing the visibility, and guide to establish national food control systems and use of standards</p>	<p><b>Iran</b></p>
<p><b>Maximize the impact of Codex by increasing the visibility and use of standards</b></p> <p>Codex Standards should not be used as a ‘regulatory ceiling’: Governments, particularly in exporting nations, have frequently interpreted Codex guidance as regulatory ceilings, limiting their ability to adopt more stringent public health measures.<sup>11</sup> This practice undermines public health goals by allowing trade interests to take precedence over the protection of health and the environment. The industry and their allies often leverage Codex guidance to their benefit as an intimidation tool, particularly in countries with limited regulatory capacity. This was evident across several Latin American countries during the implementation of front-of-pack labeling, where industry allies sought to intimidate governments against enacting robust, evidence-based policies by arguing that they would contravene existing Codex guidance.<sup>12</sup> National governments have the sovereign right to implement any legislation they deem necessary to protect public</p>	<p><b>World Public Health Nutrition Association</b></p>

<p>health, provided it does not violate international trade principles. Thus, Codex must do more to encourage governments to adopt stronger health and environmental regulations. WPHNA suggests integrating language into the Manual to inform governments that Codex standards are meant to set a regulatory floor, rather than a ceiling.</p> <p>2. Exercise caution when considering proposals and comments from Multi-stakeholder Initiatives: Corporate-influenced multi-stakeholder initiatives have contributed to confusion among Member State delegates. Multi-stakeholder initiatives often promote private sector interests over public health, undermining efforts to establish effective safeguards against COI. Governments in resource-constrained countries have faced pressure to adopt market-driven, product-based solutions to combat malnutrition, treating health-harming corporations as legitimate government partners. This approach not only mistakenly assumes that these private entities can be entrusted with protecting public health, but also further entrenches the influence of these industries in policymaking and undermines these governments' sovereignty. Codex must confront this issue directly and adhere to all WHO recommendations regarding nutrition and non-communicable diseases.</p> <p>WPHNA urges Codex to prioritize public health by carefully evaluating proposals from multi-stakeholder initiatives, ensuring that such partnerships do not compromise health goals. Should any multi-stakeholder initiative be considered, Codex must ensure that these are free of COI, and must uphold good governance principles to foster transparency, evidence-based decision-making, and accountability among all stakeholders.</p> <p>3. Member States should monitor compliance and adapt regulatory measures to capture harmful marketing practices: Member States should actively monitor compliance and adjust regulatory measures to address harmful marketing practices that affect public health. In countries where evidence-based public health measures have been codified into law, exporting countries must refrain from interfering with the enforcement of these regulations. To effectively combat the global crises of malnutrition, the rising rates of non-communicable diseases, environmental degradation, and global warming, Codex must prioritize the protection of public health in its decision-making processes. Additionally, it should ensure that the decisions made by Member States at WHO and FAO regarding health, environmental protection, and food security are fully integrated into its framework.</p>	
<p><b>Maximize the impact of Codex by increasing the visibility and use of standards</b></p> <p>We strongly support the effort to increase the visibility and use of Codex standards. We believe that this strategic goal is very crucial to reveal the importance of Codex's roles and its standards. Nevertheless, the text under this goal is not clear enough to ensure that Codex can achieve the goal. So, it should be revised for clarity. For example, more specific and tangible details are needed in bullet 3 which mentions harmonization. Additionally, there should be clear activities to evaluate how well members are adopting or adapting Codex standards. It should be noted that the use of Codex standards is diverse. These may include the use of Codex Standard as national regulation or standard, use as reference in practical application, use for certification, or promotion.</p>	<p><b>Thailand</b></p>
<p><b>The profile and recognition of Codex as the international food standards setting body for protecting consumer health and ensuring fair practices in food trade is enhanced.</b></p> <p>IBFAN ENCA could only support the above section if the standard setting process is transformed (in line with our suggestions) and if standards that do not are not fit for purpose are revoked. Codex will be stronger, more effective and better respected if time is allowed for open discussion about the long-lasting , global impact of standards that conflict with the recommendations of the World Health Assembly – the world's highest health policy-setting body.</p>	<p><b>IBFAN / ENCA</b></p>

<p>Badly formulated standards that fail to incorporate WHA recommendations are used by industries and exporting countries in attempts to stop importing governments bringing in adequate marketing controls. When Codex standards are seen as the 'regulatory ceiling' for trade purposes, the fear of triggering costly, time-consuming challenges at WTO and elsewhere has a chilling effect on policy-making. This leads to a reduction in child protection and increased risks to child health and survival – the opposite of what Codex is supposed to be for. The phrase – 'don't let the perfect be the enemy of the good' should not be used to rush bad texts through</p>	
<p><b>The profile and recognition of Codex as the international food standards setting body for protecting consumer health and ensuring fair practices in food trade is enhanced.</b></p> <p>Regarding enhancement of Codex profile and recognition, we encourage the development of advocacy tools for Codex Member states and Observer partners to help with outward communication / dissemination of Codex actions and accomplishments. Additionally, further development of educational tools globally, regarding the relevance and application of Codex Standards, Codes of Practice and Guidance to Member state regulatory frameworks is strongly encouraged, as there is a definite gap in comprehension of Codex outside of Member country regulatory agencies and industry regulatory departments.</p>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>
<p><b>The profile and recognition of Codex as the international food standards setting body for protecting consumer health and ensuring fair practices in food trade is enhanced.</b></p> <p>The UK suggest the addition of the following sentence to this bullet point: 'Codex should address current challenges such as supporting the move towards sustainable food systems and the impact of an evolving e-commerce marketplace.'</p>	<p><b>United Kingdom</b></p>
<p><b>Se fomentan las contribuciones de las organizaciones internacionales pertinentes durante la elaboración de las normas del Codex.</b></p> <p>agregr al final: considerando se coincidan con los fines y el mandato del Codex</p>	<p><b>Costa Rica</b></p>
<p><b>Contributions <u>to and from</u> relevant international organizations are encouraged throughout the development and implementation of Codex standards.</b></p> <p>The United States suggests these two edits to reflect the reciprocal nature of increasing visibility and participation in the development of standards and their use.</p>	<p><b>USA</b></p>
<p><b>Contributions from relevant international organizations are encouraged throughout the development of Codex standards.</b></p> <p>We encourage Codex to consider how to make it easier for “relevant international organizations”, once they are clearly defined, to contribute to Codex work. As a group of global scientific organizations, we currently face challenges with ease of contribution to Codex work, particularly regarding the application of science within Codex work and prioritization of such work to maximize global benefit.</p>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>

<p><del>Contributions from relevant international organizations are encouraged throughout the development of Codex standards.</del></p>	<p><b>Morocco</b></p>
<p>Contributions from relevant international organizations are <del>encouraged</del> <u>promoted</u> throughout the development of Codex standards.</p> <p>Japan prefers “promoted” to “encouraged” to facilitate contributions from relevant international organizations.</p>	<p><b>Japan</b></p>
<p><b>Harmonization through the increased use of Codex texts in establishing national food control systems, standards and regulations is advocated for.</b></p> <p>We strongly recommend focus on further development of globally harmonized food safety risk assessments and guidance on data interpretation procedures, inclusive of nutritional risks and based on reliable data using validated, fit-for-purpose methods of analysis, leveraging an expanded list of CCMAS recommended methods to address the broader risk territories.</p> <p>Specifically, we recommend:</p> <ul style="list-style-type: none"> <li>• Developing codes of practice or guidance for Member countries to use to help guide them in conducting risk assessments and data interpretation to drive global harmonization of such assessments and procedures, inclusive and integrative of food safety and nutrition, thereby enhancing global food security. The current lack of harmonization of Member countries regarding certain aspects of food safety and nutrition/diet risk assessment is a major challenge to global food security.</li> <li>• Expanding the list of methods in CXS 234-1999 to analytes that do not have established provisions in Codex standards (yet) but are relevant and important for food safety and nutrition risk assessment activities, such as emerging contaminants or new nutrients/additives/ingredients.</li> </ul>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>
<p><b>Harmonization through the increased use of Codex texts in establishing national food control systems, standards and regulations <u>in the context of national pathways for sustainable food systems</u> is advocated for.</b></p> <p>The MSEU welcome this strategic goal. The UN Food Systems Summit 2021 mobilized efforts at international, regional and national level towards the transformation of food systems. The MSEU propose to highlight the importance of the implementation of Codex texts in the context of national pathways for food system transformation.</p>	<p><b>European Union</b></p>
<p><b>Codex Members and Observers are enabled to participate actively and sustainably throughout the standard-setting process.</b></p> <p>IBFAN/ENCA Comment. In the Codex Committee on Nutrition (for IBFAN one of the most important committees) transnational food industry representatives comprise 70% of non-state observers (without voting rights) and 28% of the member state delegations (with voting rights), greatly outnumbering independently funded civil society groups. These industries fund Codex dinners, receptions, meetings and even national Codex contact points. The Codex Procedural Manual should set stricter rules regarding such commercial influence.</p> <p>To facilitate discussion, it would helpful if the list of all registered Participants – albeit in draft form – could be made available at the beginning of each the meeting. IBFAN and ENCA have highlighted the fact that food industry</p>	<p><b>IBFAN / ENCA</b></p>

<p>delegates often sit on government delegations, and on occasion lead delegations. Given the importance of Codex texts, at the very least, a caution could be placed in the Procedural Manual.</p> <p>Codex Trust Fund In order to safeguard to participation of participants from developing countries, the Procedural Manual should state that the Code Trust Fund will be publicly funded and that contributions from the private sector are prohibited</p>	
<p><b>Codex Members and Observers are enabled to participate actively and sustainably throughout the standard-setting process.</b></p> <p>Canada is unclear about the inclusion of Observers in this proposed outcome, and what additional work/resources it could entail. The relevant activity and indicator would be helpful in better understanding the rationale for this inclusion.</p>	Canada
<p><b>Codex Members and Observers are enabled to participate actively and sustainably throughout the standard-setting process.</b></p> <p>Inclusivity to easily participate in Codex Committees and Working Groups (physical and electronic) for Members and Observers is crucial to the future success of Codex. Therefore, we continue to encourage dual use of virtual and physical (hybrid) approaches for those who are cost constrained from attending physical only meetings and cannot contribute virtually (only watch via web). To that end, we encourage Codex to consider standardization of meeting locations, not within varying host countries as is current practice, but at readily accessible and technically capable UN regional offices, significantly reducing variability in complexity of achieving hybrid access for all Members and Observers yet retaining Codex Committee rotation across global regions. Continuous improvement to the functionality and ease of use of Codex platforms is needed.</p>	<p><b>AOAC INTERNATIONAL</b>  <b>European Federation of the</b>  <b>Associations of Dieticians</b>  <b>International Life Sciences Institute</b>  <b>NSF International</b>  <b>Institute of Food Technologists</b>  <b>American Society for Nutrition</b></p>
<p><b>Codex Members and Observers are enabled to participate <del>actively</del> <u>effectively</u> and sustainably throughout the standard-setting process.</b></p> <p>To ensure the effectiveness of the participation not only the number of it.</p>	Morocco
<p><b>Codex Members and Observers are enabled to participate actively and sustainably throughout the standard-setting process.</b></p> <p>Japan suggests, as agreed by CCEXEC86, placing this outcome under the first Strategic Goal “Respond to Members’ needs for protecting the health of consumers and ensuring fair practices in the food trade in an evolving global environment by developing science-based standards”. We believe that the primary purpose that Codex Members and Observers engage in Codex is to develop Codex standards that reflect their needs, and it would be more appropriate to move it under the first Goal.</p>	Japan
<p><b>Enhance work management systems and practices that support the efficient and effective achievement of all strategic plan goals</b></p> <p>Comment on Functional Goal: We welcome the moves to improve Codex management practices, increasing accessibility and participation of members and observers remotely. We see the participation of independent public health NGOs as an integral and essential part of Codex that should be recognised and enhanced in the new Strategic Plan. For transparency, we strongly urge that all Codex sessions are web-streamed and where possible hybrid. Also</p>	IBFAN / ENCA



<p>we would argue that there is clear need for the recordings to be kept on the Codex website – at the very least for the whole time that a standard for guideline is being discussed. The Committee reports are never a full and accurate record of proceedings that have huge political impact. Everyone attending Codex meeting is surely there as a representative of their institution.</p>	
<p><b>Enhance work management systems and practices that support the efficient and effective achievement of all strategic plan goals</b></p> <p>1. The public funding of the Codex Trust Fund should be explicitly included in its Procedural Manual: The public funding of the Codex Trust Fund should be explicitly included in the Codex Procedural Manual to increase transparency and safeguard against COI. The Manual should also include a clear and explicit acknowledgment of the risks associated with private sector funding and influence, including that from private philanthropies, on Codex decision-making.</p> <p>2. Health /environment /animal protective Criteria for prioritizing Codex work: WPHNA strongly supports the need for a strict prioritization mechanism that would establish whether standards should be revised, revoked or started. This process should frankly address all the global impacts, including the negative impact of Codex standards, not just the positive</p> <p>REFERENCES: References:</p> <ol style="list-style-type: none"> <li>1. Lane MM, Gamage E, Du S, et al. Ultra-processed food exposure and adverse health outcomes: umbrella review of epidemiological meta-analyses. <i>BMJ</i>. 2024;384:e077310. doi:10.1136/bmj-2023-077310</li> <li>2. Monteiro CA, Cannon G, Lawrence M, Costa Louzada ML, Pereira Machado P. Ultra-Processed Foods, Diet Quality, and Health Using the NOVA Classification System. <i>FAO</i>. <a href="http://www.fao.org/3/ca5644en/ca5644en.pdf">http://www.fao.org/3/ca5644en/ca5644en.pdf</a></li> <li>3. Leite FHM, Khandpur N, Andrade GC, et al. Ultra-processed foods should be central to global food systems dialogue and action on biodiversity. <i>BMJ Global Health</i>. 2022;7(3):e008269. doi:10.1136/bmjgh-2021-008269</li> <li>4. Anastasiou K, Baker P, Hadjikakou M, Hendrie GA, Lawrence M. A conceptual framework for understanding the environmental impacts of ultra-processed foods and implications for sustainable food systems. <i>Journal of Cleaner Production</i>. 2022;368:133155. doi:10.1016/j.jclepro.2022.133155</li> <li>5. Kaur A, Scarborough P, Rayner M. A systematic review, and meta-analyses, of the impact of health-related claims on dietary choices. <i>International Journal of Behavioral Nutrition and Physical Activity</i>. 2017;14(1):93. doi:10.1186/s12966-017-0548-1</li> <li>6. Beauchamp GK, Mennella JA. Early Flavor Learning and Its Impact on Later Feeding Behavior. <i>Journal of Pediatric Gastroenterology and Nutrition</i>. 2009;48(S1):S25-S30. doi:10.1097/MPG.0b013e31819774a5</li> <li>7. Lara-Castor L, Micha R, Cudhea F, et al. Sugar-sweetened beverage intakes among adults between 1990 and 2018 in 185 countries. <i>Nature Communications</i>. 2023;14(1):5957. doi:10.1038/s41467-023-41269-8</li> <li>8. World Health Organization. <i>Global Report on the Use of Sugar-Sweetened Beverage Taxes</i>. 2023. Licence: CC BY-NC-SA 3.0 IGO.</li> <li>9. World Health Organization. <i>Use of non-sugar sweeteners: WHO guideline</i>. 2023. Licence: CC BY-NC-SA 3.0 IGO.</li> <li>10. Rios-Leyvraz M, Montez J. <i>Health effects of the use of non-sugar sweeteners: a systematic review and meta-analysis</i>. Geneva: World Health Organization; 2022. Licence: CC BY-NC-SA 3.0 IGO.</li> </ol>	<p><b>World Public Health Nutrition Association</b></p>

<p>11. Russ K, Baker P, Byrd M, et al. What You Don't Know About the Codex Can Hurt You: How Trade Policy Trumps Global Health Governance in Infant and Young Child Nutrition. <i>International Journal of Health Policy and Management</i>. 2021;10(12):983. doi:10.34172/ijhpm.2021.109</p> <p>12. Crosbie E, Carriedo A, Schmidt L. Hollow Threats: Transnational Food and Beverage Companies' Use of International Agreements to Fight Front-of-Pack Nutrition Labeling in Mexico and Beyond. <i>Int J Health Policy Manag</i>. Published online August 10, 2020:1. doi:10.34172/ijhpm.2020.146</p>	
<p><b>Enhance work management systems and practices that support the efficient and effective achievement of all strategic plan goals</b></p> <p>We are of the view that Codex should regularly enhances its work management system. With this Functional Goal, we recommend considering the pragmatic work mechanisms to support the overall Strategic Goals, especially to increase the visibility and use of Codex standards. We believe that the concrete mechanisms will help strengthen Codex work systems.</p>	<p><b>Thailand</b></p>
<p><b>Enhance work management systems and practices that support the <del>efficient and effective</del> <u>and efficient</u> achievement of all strategic plan goals</b></p> <p>Japan suggests an editorial amendment to “effective and efficient”. Japan prefers the order “effective and efficient”, as efficiency is not generally sought without effectiveness.</p>	<p><b>Japan</b></p>
<p>Effective and efficient Codex work management practices are refined and enhanced, <del>exploiting</del> <u>using</u> digital and other new technologies to enable this.</p>	<p><b>Canada</b></p>
<p><b>Effective and efficient Codex work management practices are refined and enhanced, exploiting digital and other new technologies to enable this.</b></p> <p>Continuous improvement of available Codex E-learning and website tools and funding for such activities for the Secretariat should be prioritized by FAO/WHO and Member countries (e.g., sign-up for working groups and accessibility of posts or alerts regarding working groups).</p>	<p><b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b></p>
<p><b>Proposals to CAC for development of new Codex texts are prioritized in relation to their impact on protecting consumer health and ensuring fair practices in food trade.</b></p> <p>Protecting global and planetary health</p> <p>Prioritisation IBFAN/ENCA was pleased that CCNFSDU in Dresden, properly tested the new draft prioritising system. Codex members and observers spent a day assessing and scoring the impact new work proposals might have, not only on trade, but on global public health and food safety. CCFL spent far less time on prioritisation and the over-arching mandate of Codex to Protect Consumer Health was hardly mentioned, and on occasion questioned whether the word health was beyond the remit of Codex!</p>	<p><b>IBFAN / ENCA</b></p>

<p>IBFAN wholeheartedly welcomes the Prioritisation mechanism and believes that it can be strengthened over time to include One Health. If it had been in place in 1987, the Follow-up formula Standard might not have been adopted. This standard contained little or no safeguards and legitimized and fuelled the growth of a global market for these needless and ultra-processed products. The standard has been a major factor in the undermining of legislation to protect breastfeeding.</p>	
<p><b>Proposals to CAC for development of new Codex texts are prioritized in relation to their impact on protecting consumer health and ensuring fair practices in food trade.</b></p> <p>Proposals to CAC for development of new Codex texts and revision of existing standards are prioritized in relation to their impact on protecting consumer health and ensuring fair practices in food trade.</p>	Iran
<p><b>Proposals to CAC for development of new Codex texts are prioritized in relation to their impact on protecting consumer health and ensuring fair practices in food trade.</b></p> <p>We encourage consideration of a Working Group to define harmonized prioritization principles and practice across all Codex Committees and integration of such prioritization with the foresight/horizon scanning activity mentioned in the first strategic goal and tied to the suggested use of KPI's to track Codex impact &amp; visibility. Prioritization should be driven by globally aligned priorities across committees in relation to available Codex resources and Member/Observer contributions.</p>	<b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b>
<p><b>Proposals to CAC for development of new Codex texts are prioritized in relation to their impact on protecting consumer health and ensuring fair practices in food trade <u>trade as well as their contribution to the sustainability of food systems and the application of the One Health approach.</u></b></p> <p>The MSEU welcome the inclusion of a functional goal that aligns the organization of Codex work with the identified strategic objectives. In order to enhance this alignment, the MSEU propose to take into account the contribution to the sustainability of food systems and the application of the One Health approach for the prioritization of Codex work.</p>	European Union
<p><b><del>Chairpersons</del> <u>Chairpersons, regional coordinators, working group chairpersons, host secretariats and delegates are supported in their respective roles and their capabilities are developed developed and enhanced.</u></b></p> <p>Canada believes the proposed additions are important elements from the current strategic plan that should be retained.</p>	Canada
<p><b>Chairpersons and delegates are supported in their respective roles and their capabilities are developed.</b></p> <p>Training and development of Codex participants can be further enhanced over the strategic plan period via virtual/new technology tools to support people/teams engaged at Codex. We encourage Codex with refinement of role descriptions and development and sharing of committee management best practices across committee leadership. Additionally, maintaining consistency in the tenure of the chairpersons would be beneficial.</p>	<b>AOAC INTERNATIONAL European Federation of the Associations of Dieticians International Life Sciences Institute NSF International Institute of Food Technologists American Society for Nutrition</b>