

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 8

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-Fifth Session

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DISCUSSION PAPER ON ROLE OF CCFICS WITH RESPECT TO TACKLING FOOD FRAUD IN THE CONTEXT OF FOOD SAFETY AND FAIR PRACTICES IN FOOD TRADE

Comments from Dominican Republic, European Union, Morocco, Nigeria and Thailand

Dominican Republic

República Dominicana agradece a los Estados Unidos de América, la Unión Europea, la República Islámica de Irán y China por la preparación de este documento de debate.

República Dominicana apoya la conformación del GTe, que trabajaría solo de manera virtual.

República Dominicana apoya la elaboración del DOCUMENTO DE PROYECTO PARA LA ELABORACIÓN DE UNA ORIENTACIÓN DEL CODEX RELATIVA A LA PREVENCIÓN DEL FRAUDE ALIMENTARIO, indicado en el Apéndice II.

European Union

The European Union and its Member States (EUMS) would like to thank the electronic working group led United States, the European Union, Islamic Republic of Iran and China for the discussion paper and a proposal for new work for the development of guidance on food fraud.

Food chains both at national and international level are becoming increasingly complex and therefore more vulnerable to fraud. Consequently, initiatives are under way by many governments, international organisations and within the industry to combat food fraud. It is therefore very timely for Codex to start new work to develop guidance on how to tackle fraudulent practices in food trade.

The EUMS support the proposal for new work as presented in Appendix 1 of CX/FICS 21/25/8 with the following comments:

- The term “intentional adulteration” is used in few places in the project document together with food fraud. This is confusing as intentional adulteration is commonly recognised as a form of food fraud. Therefore, the EUMS suggest deleting the term “intentional adulteration” from the project document.
- As definitions for food fraud, food integrity and food authenticity are of importance for the work of several Codex committees, it would be appropriate to adopt them eventually as formal Codex definitions and include them in the Procedural Manual in the section “Definitions for the purposes of the Codex Alimentarius”. This work will fall under the mandate of CCGP.
- The third sentence of section 2 should also cover consumer confidence on food quality and should therefore read as follows: “Government oversight and controls or good manufacturing practices are important to avoid an environment of vulnerability for the food system and to protect consumer confidence in the safety **and quality** of the foods purchased.”
- The 3rd element in the second sentence of section 3 interferes with the remit of CCFH when referring to HACCP and good manufacturing practices and should therefore be modified as follows: “Guidance on how countries can improve their national food control systems to address food fraud, ~~e.g. extension of HACCP and good manufacturing practices~~”.
- As food fraud is already covered by a variety of Codex texts falling under the remit of several Codex committees, it would be useful to add the following sentence at the end of section 6: “**The Committee will therefore keep other Codex committees regularly informed about the progress in the work.**”

Morocco

Le Maroc approuve le nouveau travail sur l'élaboration d'orientations sur la fraude alimentaire et propose les amendements suivants :

1. Objectif et champ d'application des normes proposées :

Le Maroc propose d'intégrer **les organismes de recherche** en tant qu'acteurs importants de la lutte contre la fraude (détection d'une nouvelle forme de fraude...)

2. Pertinence et actualité :

Le Maroc estime qu'il est important de mentionner la question de la **durabilité** car elle est étroitement liée à la fraude alimentaire.

3. Principales questions à traiter :

Le Maroc propose d'inclure une mise à jour des orientations existantes en proposant dans l'alinéa 1 le libellé suivant « *Les travaux comprendront l'élaboration d'orientations sur la fraude alimentaire, qui résument et actualisent des orientations existantes dans les textes actuels du Codex.*

4 Évaluation au regard des Critères régissant l'établissement des priorités des travaux :

Le Maroc considère que certains paramètres nécessitent d'être clarifiés pour dynamiser l'obtention d'un consensus international. Il s'agit des paramètres suivants :

1. Les lois et règlements de chaque pays ;
2. Les intentions des pays en matière de sanctions ;
3. Les attentes des consommateurs ;
4. Les impacts économiques générés par une réglementation internationale sur toutes les chaînes de valeur et ;
5. Les directives générales quant aux peines.

Nigeria

Nigeria appreciates the work done by the electronic working group chaired by the United States of America and co-chaired by the European Union, the Islamic Republic of Iran and China in the development of the discussion paper.

Nigeria supports Codex work by CCFICS to develop guidelines on food fraud within the context of food safety and fair practices in food trade.

Thailand

Thailand would like to express our appreciation and congratulation to the Electronic Working Group on Food Fraud for preparing a Discussion Paper on Role of CCFICS with Respect to Tackling Food Fraud in the Context of Food Safety and Fair Trade Practices in Food ([CX/FICS 21/25/8 – March 2021](#)).

Our comments on specific sections are as follows:

Annex II: Project document for the development of guidance on food fraud

1. Section 2 Relevance and timeliness and 3 The main aspects to be covered:

The terms “Food fraud” and “Intentional adulteration”

According to the previous document ([CX/FICS/18/24/7](#)), “intentional adulteration” is considered as one type of “food fraud”, among others. However, to avoid misunderstanding, we would like to propose the deletion of phrase “and/or intentional adulteration” in the following:

Section 2: Relevance and timeliness (Last sentence of the first para)

“.....The industry is responsible for knowing their supply chains and having control measures in place to tackle food fraud, while the government has a regulatory oversight and a role in increasing awareness of food fraud, building partnerships and collaborating with industry, academia, and other government departments to prevent and manage food fraud ~~and/or intentional adulteration.~~”

Section 3: The main aspects to be covered

“.....(4) Identification of technology and tools, countermeasures and controls that can assist competent authorities and industry to evaluate and adopt a risk-based approach to detect acts of fraud and to reduce vulnerabilities when designing control programs to prevent food fraud and/or intentional adulteration;.....”

2. Section 3 The main aspects to be covered, Point 3:

With regard to Point 3 of Section 3 The main aspects to be covered, we suggest to remove the phrase “*e.g. extension of HACCP and good manufacturing practices*” to read as follows;

“(3) Guidance on how countries can modernize their national food control system to address food fraud; ~~*e.g. extension of HACCP and good manufacturing practices;*~~”