

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 5**

**CX/AFRICA 22/24/05 Add1  
ORIGINAL LANGUAGE ONLY**

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME  
FAO/WHO COORDINATING COMMITTEE FOR AFRICA**

**24<sup>th</sup> Session**

**Virtual,**

**5 – 9 and 13 September 2022**

**Proposed draft Guidelines for Developing Harmonized Food Safety Legislation for CCAFRICA Region**

**Comments in reply to CL 2022/02/OCS-CCAFRICA**

*Comments of Botswana, Malawi, Mauritius, Morocco, Nigeria, Rwanda, Somalia, South Africa, Tanzania, Uganda, Zambia, Egypt, EU, FIVS, ICBA and IFT*

## **Background**

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2022/02/OCS-CCAFRICA issued in february 2022. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

## **Explanatory notes on the appendix**

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

## Comments in reply to CL 2022/02/OCS-CCAFRICA

Text	Comment by
<b>GENERAL COMMENTS</b>	
<p>Malawi has reviewed the Guidelines and we find them to be in order.</p> <p>However, We have suggested some typo changes as indicated in the doc attached. I propose that the document should use the phrase “These Guidelines” instead of “This Guidelines”.</p>	<b>Malawi</b>
<p>The European Union would like to thank the Secretariat for CCAFRICA and the Members of the Committee for giving us the opportunity to comment on the Draft guidelines for developing harmonized Food Safety Legislation for the CCAFRICA region in the Appendix to circular letter CL-2022/02 AFRICA.</p> <p>The EU recognises that the proposed approach provides a structured framework for developing harmonized food safety legislation for the region and would like to propose some suggestion to make further clarity to the text.</p> <ul style="list-style-type: none"> <li>• The EU notes that the introduction of the guidelines highlights the contribution of food safety to sustainable development. In line with this introduction, we would like to propose that a references to sustainable food are also considered in the relevant other parts of the text. Beside the worldwide growing awareness of the need to strengthen national food safety systems to improve protection of consumers’ health, the focus is to build sustainable, resilient, innovative and integrated food safety systems globally.</li> <li>• The EU suggests to also include the adoption of a One Health approach in the principles of food safety legislation. The importance of adopting this approach is underlined in the WHO Global Strategy for Food safety 2022-2030.</li> <li>• The principles and in particular principle 2 on “the food chain approach” could also use the concept of food safety system that is developed in the WHO Global Strategy for Food safety 2022-2030.</li> <li>• The establishment of an African Food Safety Agency that is being under consideration by the AU, could be a useful support to the future harmonised food safety legislation, i.e. the establishment of such an agency may be part of the harmonised food safety legislation and its role and tasks can be defined.</li> <li>• It would be useful to consider the establishment of a food alert system which would enable information to be shared between its members, in order to advert food safety risks before they could be harmful for consumers</li> </ul>	<b>European Union .</b>
<p>Put revision as: CXC 1-1969, rev. 2020) Where CXC 1 has been used.</p> <p>Rationale: Since CXC 1-1969 has been consistently revised, it is better to indicate the version used</p>	<b>Rwanda</b>
<p>Paragraph 26;</p> <p>When designing a food safety legislation, CCAFRICA member countries should aim at the harmonized approach</p>	<b>Uganda</b>

Text	Comment by
to ensure consumer protection and facilitate the Intra /Inter-African trade.	Rationale: For improvement of the statement to capture the spirit of the document
<p>Food safety is an essential component of sustainable development and contributes towards improvement of public health, poverty reduction, increased food security, and environmental protection. Food safety legislation among CCAFRICA member countries face major challenges including but not limited to the extent that some existing legislation may be outdated inadequate in addressing current and emerging food safety issues, fragmented in different government institutions and low investment for effective implementation. This may create lapses among food control enforcement agents and food business operators. Consequently, enforcement of food safety legislation becomes problematic, thus compromising efforts towards consumer protection against fraudulent practices and unsafe food products. This also results in production of substandard foods leading to rejections products in the national regional and international markets</p>	<p><b>Uganda</b></p> <p>Rationale:</p> <ol style="list-style-type: none"> <li>To specifically mention inadequate areas in the region and emphasize the government's role in food safety legislation and its implementation.</li> <li>Makes the paragraph more elaborate and inclusive of both imports and exports traded in the region</li> </ol> <p>When designing a food safety legislation, CCAFRICA member countries should aim at the harmonized approach to ensure consumer protection and facilitate the Intra /Inter-African trade.</p> <p>Rationale: For improvement of the statement to capture the spirit of the document</p>
<p><b>Proposed Draft Guidelines for developing Harmonized Food Safety Legislation for the CCAFRICA Region</b></p> <p>FIVS welcomes the opportunity to comment on the first draft guidelines for Guidance on the Prevention and Control of Food Fraud.</p> <p>FIVS is a global trade federation for the alcohol beverage industry since 1951. We are committed to providing a venue and developing tools to encourage social, environmental, and economic sustainabil-ity among our members and the wider sector, in keeping with the United Nations Sustainable Develop-ment Goals. Our membership includes producers, importers, exporters, and trade associations (current-ly accounting for 75% of the wine traded globally). We also welcome and collaborate effectively with affiliates from allied industries.</p>	<p><b>FIVS</b></p>
<b>TABLE OF CONTENTS –</b>	
<p><b><u>PRINCIPLE 9 - PREVENTATIVE MEASURES</u></b></p> <p><b><u>PRINCIPLE 10 - CONSISTENCY AND IMPARTIALITY</u></b></p>	<p><b>ICBA</b></p> <p>ICBA suggests updates to the table of contents to add principles 9 and principle 10.</p>
<p><b>Table des matières</b></p> <p>Ajouter à la section 5 le Principe 9: Principe de précaution</p>	<p><b>Morocco</b></p>
<b>SECTION 1 - INTRODUCTION</b>	
<p>1. Food safety is an essential component of sustainable development and contributes towards improvement of public health, poverty reduction, increased food security, and environmental protection. Food safety legislation among CCAFRICA member countries face major challenges including but not limited to the extent that some existing legislation may be outdated, inadequate and fragmented. This may create lapses among food control enforcement agents and food business operators. Consequently, enforcement of food safety legislation becomes problematic, thus compromising efforts towards consumer protection against fraudulent practices and unsafe food products. This also results in production of substandard foods leading to rejections of exports from the region.</p>	
<p>A reference to sustainable food systems is suggested be included in the introduction.</p>	<p><b>European Union</b></p>

Text	Comment by
<p>1. Food safety is an essential component of sustainable development and contributes towards improvement of public health, poverty reduction, increased food security, and environmental protection. Food safety legislation among CCAFRICA member countries face major challenges including but not limited to the extent that some existing legislation may be <del>outdated, outdated and inadequate in addressing current and fragmented emerging food safety issues, fragmented in different government institutions and low investment for effective implementation.</del> This may create lapses among food control enforcement agents and food business operators. Consequently, enforcement of food safety legislation becomes problematic, thus compromising efforts towards consumer protection against fraudulent practices and unsafe food products. This also results in production of substandard foods leading to <del>rejections rejection of exports from products in the region-national regional and international markets.</del></p>	<p><b>Nigeria</b></p>
<p>Paragraph 1 Line 2</p>	<p><b>Egypt</b> Egypt proposes to</p> <ul style="list-style-type: none"> <li>• replace improvement by protection of public health in line 2</li> <li>• 2nd line : "increased" is redundant and is to be deleted. Food security strategies do not aim at achieving "degrees" of food security.</li> </ul>
<p>1. Food safety is an essential component of sustainable development and contributes towards improvement of public health, poverty reduction, increased food security, and environmental protection. Food safety legislation among CCAFRICA member countries face major challenges including but not limited to the extent that some existing legislation may be outdated, inadequate and fragmented. This may create lapses among food control enforcement agents and food business operators. Consequently, enforcement of food safety legislation becomes problematic, thus compromising efforts towards consumer protection against fraudulent practices and unsafe food products. This also results in <u>the</u> production of substandard <del>foods-foods, thereby</del> leading to rejections of exports from the region.</p>	<p><b>Mauritius</b></p>
<p>1. Food safety is an essential component of sustainable development and contributes towards improvement of public health, poverty reduction, increased food security, and environmental protection. Food safety legislation among CCAFRICA member countries face major challenges <del>including but not limited</del> to the extent that some existing legislation may be outdated, inadequate and fragmented. This may create <del>lapses-lack of coordination</del> among food control enforcement agents and food business operators. Consequently, enforcement of food safety legislation becomes problematic, <del>thus-hence</del> compromising efforts towards consumer protection against fraudulent practices and unsafe food products. This also results in production of substandard foods leading to rejections of exports from the region.</p>	<p><b>ICBA</b> ICBA proposes to use the term "lack of coordination" instead of "lapse" because we believe it more accurately describes the issue.</p>
<p>1. Food safety is an essential component of sustainable development and contributes towards improvement of public health, poverty reduction, increased food security, and</p>	<p><b>United Republic of Tanzania</b></p>

Text	Comment by
<p>environmental protection. Food safety legislation among CCAFRICA member countries face major challenges including but not limited to the extent that some existing legislation may be outdated, inadequate <u>in addressing current and fragmented emerging food safety issues, fragmented in different government institutions and low investment for effective implementation.</u> This may create lapses among food control enforcement agents and food business operators. Consequently, enforcement of food safety legislation becomes problematic, thus compromising efforts towards consumer protection against fraudulent practices and unsafe food products. This also results in production of substandard foods leading to rejections of <del>exports from products in the region</del> national, regional and international markets.</p>	<p>To specifically mention inadequate areas in the region and emphasize the government's role in food safety legislation and its implementation.</p> <p>Makes the paragraph more elaborate and inclusive of both imports and exports traded in the region</p>
<p>Paragraph 1 – last sentence</p>	<p><b>IFT</b></p> <p>IFT Recommends the last sentence read  <u>"Such enforcement challenges this—also result in production of substandard foods, leading to rejections of exports from the country/region."</u></p>
<p>1. Food safety is an essential component of sustainable development and contributes towards improvement of public health, poverty reduction, increased food security, and environmental protection. Food safety legislation among CCAFRICA member countries face major challenges including but not limited to the extent that <del>some</del> <u>most of the</u> existing legislation may be outdated, inadequate and fragmented. This may create lapses among food control enforcement agents and food business operators. Consequently, enforcement of food safety legislation becomes problematic, thus compromising efforts towards consumer protection against fraudulent practices and unsafe food products. This also results in production of substandard <del>foods</del> <u>food products</u> leading to rejections of exports from the region, thus posing barrier to trade.</p>	<p><b>Botswana</b></p> <p>- replace some with most of the in ..... but not limited to the extent that most of the existing legislation may be outdated, - substandard food products add at the end of para ....thus posing a trade barrier.</p>
<p>1. La sécurité sanitaire des aliments, composante essentielle du développement durable, contribue à l'amélioration de la santé publique, à la réduction de la pauvreté, au renforcement de la sécurité alimentaire et à la protection de l'environnement. Les pays membres du Comité de coordination du Codex pour l'Afrique (le Comité) se heurtent à des difficultés importantes en ce qui concerne la législation sur la sécurité sanitaire des aliments, notamment mais pas exclusivement du fait que certaines législations en vigueur peuvent être dépassées, inappropriées et fragmentées. Cela peut entraîner un décalage <u>de compréhension</u> entre les agents chargés de faire appliquer le contrôle des produits alimentaires et les exploitants du secteur alimentaire. Par conséquent, l'application de la législation relative à la sécurité sanitaire des aliments pose <del>problème</del> <u>certaines difficultés</u> et cela nuit aux efforts déployés en faveur de la protection des consommateurs contre les pratiques frauduleuses et les produits alimentaires peu sûrs. Il en résulte également la production d'aliments de qualité inférieure aux normes exigées, qui conduit à <del>un rejet des exportations</del> <u>rejet aux frontières</u> de la région.</p>	<p><b>Morocco</b></p>

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<p>1. La sécurité sanitaire des aliments, composante essentielle du développement durable, contribue à l'amélioration de la santé publique, à la réduction de la pauvreté, au renforcement de la sécurité alimentaire et à la protection de l'environnement. Les pays membres du Comité de coordination du Codex pour l'Afrique (le Comité) se heurtent à des difficultés importantes en ce qui concerne la législation sur la sécurité sanitaire des aliments, notamment mais pas exclusivement du fait que certaines législations en vigueur peuvent être dépassées, <u>incomplètes</u>, <u>inappropriées</u> et fragmentées. Cela peut entraîner un décalage entre les agents chargés de faire appliquer le contrôle des produits alimentaires et les exploitants du secteur alimentaire. Par conséquent, l'application de la législation relative à la sécurité sanitaire des aliments pose problème et cela nuit aux efforts déployés en faveur de la protection des consommateurs contre les pratiques frauduleuses et les produits alimentaires peu sûrs. Il en résulte également la production d'aliments de qualité inférieure aux normes exigées, qui conduit à un rejet des exportations de la région.</p>	<p><b>Morocco</b></p>
<p>2. Globalization of food trade compels governments to develop food safety legislation that isaligned to regional and international standards, assure consumer safety and promote fair practices in food trade.</p>	
<p>2. Globalization of food trade compels governments to develop food safety legislation that is aligned to regional and international standards, <u>assure and ensure</u> consumer safety and promote fair practices in food trade.</p>	<p><b>Rwanda</b></p>
<p>Paragraph 2, first line</p>	<p><b>Zambia</b> instead of isaligned, put space between is and aligned to read is aligned</p>
<p>Paragraph 2, first line</p>	<p><b>South Africa</b> is aligned instead of isaligned</p>
<p>ALL THROUGH THE DOCUMENT, simple typos, such as omission of a space, are corrected and their place marked by giving a red color to the revised words.</p>	<p><b>Egypt</b></p>
<p>Paragraph 2, first line</p>	<p><b>Somalia</b> is aligned instead of isaligned</p>
<p>Paragraph 2, first line</p>	<p><b>Mauritius</b> is aligned instead of isaligned</p>
<p>2. Globalization of food trade compels governments to develop food safety legislation that isaligned to regional and international standards, <u>assure and ensure</u> consumer safety and promote fair practices in food trade.</p>	<p><b>Uganda</b></p>
<p>2. Globalization of food trade compels governments to develop food safety legislation that <del>isaligned</del><u>is aligned</u> to regional and international standards, assure consumer safety and promote fair practices in food trade.</p>	<p><b>ICBA</b></p>
<p>2. Globalization of food trade compels governments to develop food safety legislation that isaligned to regional and international standards, assure <u>and ensure</u> consumer safety and promote fair practices in food trade.</p>	<p><b>United Republic of Tanzania</b> T align with other codex text</p>
<p>2. Globalization of food trade compels governments to develop food safety legislation that isaligned <del>to</del> <u>with</u> regional and international standards, <u>in order to</u> assure food safety for</p>	<p><b>IFT</b> IFT recommends changing point 2 to read: "Globalization of food trade compels</p>

Text	Comment by
<u>their</u> consumer <del>safety</del> and promote fair <del>practices</del> in food trade <u>practices</u> .	governments to develop food safety legislation that is aligned with regional and international standards, in order to assure food safety for their consumers and promote fair food trade practices."
2. Globalization of food trade compels governments to develop food safety legislation that <del>is aligned</del> <u>is aligned</u> to regional and international standards, assure consumer safety and promote fair <u>trade</u> practices <del>in food trade</del> .	<b>Botswana</b>
2. La mondialisation du commerce des aliments contraint les gouvernements à élaborer une législation en matière de sécurité sanitaire des aliments qui soit conforme aux normes régionales et internationales, <del>assure pour assurer la sécurité</del> <u>protection des consommateurs</u> et <del>promeuve</del> <u>promouvoir</u> des pratiques loyales dans le commerce des produits alimentaires.	<b>Morocco</b>
<b>3.</b> African governments are committed to promote and boost inter/intraregional trade in agricultural commodities as emphasized in the Malabo Declaration commitment of June 2014. In this regard, it is important to harmonize food safety policies, standards and legislation as well as build the capacity of competent authorities to ensure the protection of public health and facilitate fair practices in food trade. There are differences in the food safety legislation among CCAFRICA member countries with different regulatory frameworks which may affect regional and international food trade.	
3. African governments are committed to <del>promote</del> <u>promoting</u> and <del>boost</del> <u>boosting</u> inter/intraregional trade in agricultural commodities as emphasized in the Malabo Declaration commitment of June 2014. In this regard, it is important to harmonize food safety policies, standards and legislation as well as build the capacity of competent authorities to ensure the protection of public health and facilitate fair practices in food trade. There are differences in the food safety legislation among CCAFRICA member countries with different regulatory frameworks which may affect regional and international food trade.	<b>Mauritius</b>
3. African governments are committed to promote and boost inter/intraregional trade in agricultural commodities as emphasized in the Malabo Declaration commitment of June 2014. In this regard, it is important to harmonize food safety policies, standards and legislation as well as build the capacity of competent authorities <u>and relevant stakeholders</u> to ensure the protection of public health and facilitate fair practices in food trade. There are differences in the food safety legislation among CCAFRICA member countries with different regulatory frameworks which may affect regional and international food trade.	<b>Uganda</b> Rationale: To make the statement more elaborate.
3. African governments are committed to promote and boost inter/intraregional trade in agricultural commodities as emphasized in the Malabo Declaration commitment of June 2014. In this regard, it is important to harmonize food safety policies, standards and legislation as well as build the capacity of competent authorities <u>and relevant stakeholders</u> to ensure the protection of public health and facilitate fair practices in food trade. There are differences in the food safety legislation among CCAFRICA member countries with different regulatory frameworks which may affect regional and international food trade.	<b>United Republic of Tanzania</b> To make the statement more elaborate
3. Les gouvernements africains se sont engagés à promouvoir et à favoriser le commerce régional et	<b>Morocco</b>

Text	Comment by
<p>interrégional des produits agricoles agricoles et agroalimentaires, comme il a été souligné dans la Déclaration de Malabo de juin 2014. À cet effet, il est important d'harmoniser les politiques, les normes et la législation en matière de sécurité sanitaire des aliments ainsi que de renforcer la capacité des autorités compétentes de protéger la santé publique et de faciliter l'adoption de pratiques loyales dans le commerce des produits alimentaires. La législation relative à la sécurité sanitaire des aliments varie d'un pays membre à l'autre au sein du Comité, et les différences qui existent entre les cadres réglementaires peuvent avoir des incidences <u>négatives</u> sur le commerce régional et international des produits alimentaires.</p>	
<p>4. Guidelines for developing harmonized food safety legislation for the CCAFRICA region, have been developed to provide guidance to CCAFRICA member countries in development and/or updating their food safety legislation. This will enable member countries to strengthen their food legislation and food control systems as well as develop harmonized policies, standards and legal frameworks.</p>	
<p>4. Guidelines for developing harmonized food safety legislation for the CCAFRICA region, have been developed to provide guidance to CCAFRICA member countries in development and/or updating their food safety legislation. This will enable member countries to strengthen their food legislation and food control systems as well as develop harmonized policies, standards and legal frameworks.</p>	<p><b>Egypt</b> To replace "in" by "on".</p>
<p>4. Guidelines for developing harmonized food safety legislation for the CCAFRICA region, have been developed to provide <b>guidance</b> to CCAFRICA member countries in development and/or updating their food safety legislation. This will enable member countries to strengthen their food legislation and food control systems as well as develop harmonized policies, standards and legal frameworks.</p>	<p><b>Mauritius</b> "This" here refers to what? guidelines [...] provide guidance. could we use a different wording here?</p>
<p>4 Guidelines for developing harmonized food safety legislation for the CCAFRICA region, have been developed to provide guidance to CCAFRICA member countries in development and/or updating their food safety legislation. This will enable member countries to strengthen their food <u>safety</u> legislation and food <u>safety</u> control systems as well as develop harmonized policies, standards and legal frameworks.</p>	<p><b>ICBA</b></p>
<p>5. This document is developed in line with Codex texts and other relevant international documents.</p>	
<p>5. This document is developed in line with Codex texts and other relevant international documents.</p>	<p><b>South Africa</b> It might be necessary to also add ..."including subsequent amendments and revisions" after Codex text.. Again it should be clear that WTO SPS Agreement recognizes Codex as point of reference when it comes to Food Safety</p>
<p>5. Le présent document est établi conformément aux textes du Codex et aux autres documents internationaux <u>et régionaux</u> pertinents.</p>	<p><b>Morocco</b></p>
<p>6. It will contribute to regulation of the food chain to assure food safety while facilitating fair practices in food trade.</p>	
<p>6. It will contribute to regulation of the food chain to assure food safety while facilitating fair practices in food trade.</p>	<p><b>Rwanda</b> Replace "assure" by "ensure"</p>

Text	Comment by
6. It will contribute to regulation of the food chain to assure food safety while facilitating fair practices in food trade.	<b>Egypt</b> Replace with “It contributes” which is the correct verb tense to use in a Guidelines.
6. It will contribute to regulation of the food chain to assure and <u>ensure</u> food safety while facilitating fair practices in food trade.	<b>Uganda</b> Rationale: Makes the statement more elaborate and align it to other Codex texts
6. It will contribute to regulation of the food chain to assure <u>and ensure</u> food safety while facilitating fair practices in food trade.	<b>United Republic of Tanzania</b> To align with other codex text
6. Il <del>contribuera</del> vise à <u>contribuer</u> à la <u>mise en place d'une réglementation adéquate</u> de la chaîne alimentaire, l'objectif étant d'assurer la sécurité sanitaire des aliments tout en favorisant des pratiques loyales dans le commerce des produits alimentaires.	<b>Morocco</b>
<b>7. The guidelines may serve as a basis for development of national or regional Food Safety Legislation, to support Intra Africa trade as envisioned in the African Continental Free Trade Area (AfCFTA,2019) Agreement.</b>	
The guidelines may serve as a basis for development of national or regional Food Safety Legislation, to support <del>Intra</del> <u>inter/Intra Africa Food</u> trade as envisioned in the African Continental Free Trade Area (AfCFTA,2019) Agreement.	<b>Nigeria</b>
The <del>G</del> guidelines may serve as a basis for development of national or regional Food Safety Legislation, to support Intra Africa trade as envisioned in the African Continental Free Trade Area (AfCFTA,2019) Agreement.	<b>Egypt</b> To change to read “The Guidelines”. Reference to the present “Guidelines” under review all through the document must be written with a capital “G”. The word ‘guidelines’ used in other sentences is written with a small “g”.
The guidelines may serve as a basis for development of national or regional Food Safety Legislation, to support <u>Inter/Intra Africa Food</u> trade as envisioned in the African Continental Free Trade Area (AfCFTA,2019) Agreement.  Rationale: To make the statement more elaborate and inclusive of inter Africa trade.	<b>Uganda</b>
The guidelines may serve as a basis for development of national or regional Food Safety Legislation, to support <del>Intra Africa</del> <u>intra-Africa</u> trade as envisioned in the African Continental Free Trade Area (AfCFTA,2019) Agreement.	<b>ICBA</b>
The guidelines may serve as a basis for development of national or regional Food Safety Legislation, to support <del>Intra</del> <u>Inter/Intra Africa food</u> trade as envisioned in the African Continental Free Trade Area (AfCFTA,2019) Agreement.	<b>United Republic of Tanzania</b> To make the statement more elaborate and inclusive of inter Africa trade
The guidelines may serve as a basis for development of national or regional <del>Food Safety Legislation</del> <u>food safety legislation</u> , to support Intra Africa trade as envisioned in the African Continental Free Trade Area (AfCFTA,2019) Agreement.	<b>Botswana</b>
Les <u>présentes</u> directives peuvent servir de base à l'élaboration d'une législation nationale ou régionale sur la sécurité sanitaire des aliments, à l'appui du commerce intra-africain tel qu'il est envisagé dans l'Accord sur la zone de libre-échange continentale africaine (2019).	<b>Morocco</b>

Text	Comment by
8. This guidelines provide for identification of relevant food safety stakeholders and outlines their roles and responsibilities for effective implementation of harmonized food safety legislation.	
<del>This</del> <u>These</u> guidelines provide for identification of relevant food safety stakeholders and outlines their roles and responsibilities for effective implementation of harmonized food safety legislation.	<b>Malawi</b>
This <u>G</u> uidelines provide for identification of relevant food safety stakeholders and outlines their roles and responsibilities for effective implementation of harmonized food safety legislation.	<b>Egypt</b>
This guidelines provide for <u>the</u> identification of relevant food safety stakeholders and outlines their roles and responsibilities for effective implementation of harmonized food safety legislation.	<b>Mauritius</b>
This guidelines provide for identification of relevant food safety stakeholders and <del>outlines</del> <u>outline</u> their roles and responsibilities for effective implementation of harmonized food safety legislation.	<b>Mauritius</b>
This guidelines <del>s</del> provide for identification of relevant food safety stakeholders and outlines their roles and responsibilities for effective implementation of harmonized food safety legislation.	<b>Uganda</b>
<del>Les directives</del> <u>Elles</u> prévoient l'identification des parties prenantes concernées par la sécurité sanitaire des aliments et définissent leurs rôles et responsabilités pour la mise en œuvre efficace d'une législation harmonisée en la matière.	<b>Morocco</b>
<b>9.</b> To attain a robust and effective food control system, there is a need for CCAFRICA member countries to enhance their capacities in laboratory infrastructure, human resources and conformity assessment procedures among others.	
"Harmonized food safety legislation helps CCAFRICA member countries attain a robust and effective food control system by enhancing their capacities in laboratory <del>To attain a robust and effective food control system, there is a need for CCAFRICA member countries to enhance their capacities in laboratory infrastructure,</del> human resources and conformity assessment procedures among others.	<b>Egypt</b> Language used in item 9, is out of line with the language/syntax used in other items of Section 1. Propose to revise beginning of the sentence.
To attain a robust and effective food <u>safety</u> control system, there is a need for CCAFRICA member countries to enhance their capacities in laboratory infrastructure, human resources and conformity assessment procedures among others.	<b>ICBA</b>
Pour parvenir à un système <del>de contrôle d'inspection et certification</del> <u>sanitaires</u> des aliments robuste et efficace, il convient que les pays membres du Comité renforcent leurs capacités en ce qui concerne les infrastructures de <del>laboratoire</del> <u>laboratoires</u> et d'inspection, les ressources humaines <u>qualifiées</u> et les procédures d'évaluation de la <del>conformité</del> <u>conformité</u> des aliments et des infrastructures de la chaîne alimentaire, <del>entre les procédures de certification sanitaire et de contrôle aux frontières et autres.</del>	<b>Morocco</b>
10 These guidelines should be used together with other existing Codex texts <sup>1</sup> and/or other relevant internationally recognized guidelines.	

[33]<sup>1</sup> Principles and Guidelines for National Food Control Systems (CXG 82-2013); General Principles of Food Hygiene (CXC 1-1969); Principles for Food Import and Export Inspection and Certification (CXG 20-1995); Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations (CXG 19-1995); Principles and guidelines for the exchange of information between

Text	Comment by
<p>10. These guidelines should be used together with other existing Codex texts<sup>1</sup> and/or other relevant internationally recognized guidelines.</p>	<p><b>Uganda</b></p> <p><u>Proposal for New Paragraph 11,12 and 13 to read:</u></p> <p><u>11. This guideline complements and supports the effective implementation of the SPS Policy Framework for Africa (2019) and Food Safety Strategy for Africa (2021)</u></p> <p><u>12. This guideline should be used in conjunction with the WTO SPS and TBT agreement and will help address non tariff barriers</u></p> <p><u>13. Member countries should provide for sufficient funding to support implementation of regular functions as provided in Article 8 (Control, inspection, and approval procedures) and its annex C of the WTO SPS agreement.</u></p> <p><u>Rationale:</u></p> <p><u>For 11.. The guidelines recognizes the two documents as well;</u></p> <p><u>For 12... The guidelines recognizes the WTO &amp; TBT agreements documents as well; and</u></p> <p><u>For 13... Funding has been identified as an issue in the African context.</u></p>
<p>10. These guidelines should be used together with other existing Codex texts<sup>1</sup> and/or other relevant <u>nationally , regionally and internationally</u> recognized guidelines.</p>	<p><b>Uganda</b></p>
<p>10. These guidelines should be used together with other existing Codex texts<sup>1</sup> and/or other relevant internationally recognized <u>food safety</u> guidelines.</p>	<p><b>ICBA</b></p>
<p>10. These guidelines should be used together with other existing Codex texts<sup>1</sup> and/or other relevant internationally recognized guidelines.</p> <p><u>Proposal for New Paragraph 11,12 and 13 to read:11.</u></p> <p><u>This guideline complements and supports the effective implementation of the SPS Policy Framework for Africa (2019) and Food Safety Strategy for Africa (2021)12. This guideline should be used in conjunction with the WTO SPS and TBT agreement and will help address non tariff barriersMember countries should provide for sufficient funding to support implementation of regular functions as provided in Article 8 (Control, inspection, and approval procedures) and its annex C of the WTO SPS agreement.</u></p>	<p><b>United Republic of Tanzania</b></p> <p>For 11.. The guidelines recognizes the two documents as well;</p> <p>For 12... The guidelines recognizes the WTO &amp; TBT agreements documents as well; and</p> <p>For 13... Funding has been identified as an issue in the African context</p>
<p><del>10 These guidelines</del> <u>This guideline</u> should be used together with other existing Codex texts<sup>1</sup> and/or other relevant <u>nationally , regionally and internationally</u> recognized guidelines.</p>	

Text	Comment by
<b>SECTION 2 – SCOPE</b>	
11. The scope of this guideline is to provide guidance to CCAFRICA members in developing or updating food safety legislation. The document covers guidelines on developing food safety legislations along the food chain including food traded nationally, regionally, and internationally.	
11. The scope of this guideline is to provide guidance to CCAFRICA members in developing or updating food safety legislation. <del>The document covers guidelines on developing food safety legislations</del> along the food chain including food traded nationally, regionally, and internationally.	<p><b>South Africa</b></p> <p>It should read member countries to be consistent with the entire document</p> <p>we also suggest that the paragraph should read..."</p> <p>The scope of this guideline is to provide guidance to CCAFRICA members in developing or updating food safety legislation along the food chain including food traded nationally, regionally, and internationally.</p>
11. The scope of this guideline is to provide guidance to CCAFRICA members in developing or updating food safety legislation. The document covers guidelines on developing food safety legislations along the food chain including food traded nationally, regionally, and internationally.	<p><b>Zambia</b></p> <p>remove s from members and include countries after members for consistency to read as CCAFRICA member countries</p>
11. The scope of this <del>guideline document</del> is to provide guidance to CCAFRICA members in developing or updating food safety legislation. The document covers guidelines on developing food safety legislations along the food chain including food traded nationally, regionally, and internationally.	<p><b>Mauritius</b></p>
11. The scope of this guideline is to provide guidance to CCAFRICA members in developing or updating food safety <del>legislation. The document covers guidelines on developing food safety legislations</del> <u>legislation</u> along the food chain including food traded nationally, regionally, and internationally.	<p><b>ICBA</b></p> <p>ICBA suggests deletion because of repetition of first sentence.</p>
11. Les présentes directives visent à fournir aux membres du Comité des orientations concernant l'élaboration ou la mise à jour de la législation relative à la sécurité sanitaire des aliments. Le présent document couvre les directives relatives à l'élaboration <del>de législations d'une législation</del> sur la sécurité sanitaire des aliments tout au long de la chaîne alimentaire, concernant les aliments commercialisés aux niveaux national, régional et international.	<p><b>Morocco</b></p>
11. Les présentes directives visent à fournir aux membres du Comité <u>CCAFRICA</u> des orientations concernant l'élaboration ou la mise à jour de la législation relative à la sécurité sanitaire des aliments. Le présent document couvre les directives relatives à l'élaboration de législations sur la sécurité sanitaire des aliments tout au long de la chaîne alimentaire, concernant les aliments commercialisés aux niveaux national, régional et international.	
<b>12</b> The purpose of this guidelines is to;	
The purpose of this <del>guidelines</del> <u>guideline</u> is to;	<p><b>Malawi</b></p>
Maybe the bullets should be replaced with numbering (i) - (iii) or (a) - (c)	<p><b>South Africa</b></p>

Text	Comment by
The purpose of this guidelines is to;	<b>Egypt</b> To add “their” to read, “... updating their ...”
The purpose of this <del>guidelines</del> guideline is to;	<b>Mauritius</b>
The purpose of this guidelines is to;	<b>Uganda</b> The purpose of this guideline is to.....
The purpose of <del>this</del> these guidelines is to;	<b>Botswana</b>
<b>Bullet 1</b>	
enable CCAFRICA member countries <del>to</del> develop harmonized food safety legislations in order to strengthen science-based food <u>safety control</u> systems;	<b>ICBA</b>
permettre aux pays membres du Comité d’élaborer des législations harmonisées relatives à la sécurité sanitaire des aliments afin de renforcer les systèmes <del>de contrôle d’inspection et certification sanitaire</del> des aliments fondés sur des données scientifiques;	<b>Morocco</b>
<b>Bullet 2</b>	
provide the general concepts and principles governing food safety legislation that will lead to the establishment of well-coordinated national and regional food <u>safety control</u> systems; and	<b>ICBA</b>
provide the general concepts and principles governing food safety <del>legislation</del> legislations that will lead to the establishment of well-coordinated national and regional food control systems; and	<b>Botswana</b>
<b>Bullet 3</b>	
promote an integrated approach to food safety along the entire food chain and facilitate intra-African food trade by creating a harmonized framework for the development of food safety legislations.	<b>South Africa</b> This sentence should end with intra-African trade and delete the rest of the sentence as it repeats what is in the first bullet
promote an integrated approach to food safety along the entire food chain and facilitate intra-African food trade by creating a harmonized framework for the development of food safety legislations.	<b>Mauritius</b> The guideline seems to cover food (and not feed). So does it really cater for the entire food chain, from farm to fork?
<del>Faciliter la mise sur le marché africain et mondial d’aliments sûrs et fluidifier les échanges interafricains en créant un cadre de travail clair pour le développement d’une législation sur la SSA harmonisée promouvoir une approche intégrée de la sécurité sanitaire des aliments tout au long de la chaîne alimentaire et faciliter le commerce intra-africain de produits alimentaires en créant un cadre harmonisé pour l’élaboration de législations relatives à la sécurité sanitaire des aliments.</del>	<b>Morocco</b>
<b>SECTION 4 - DEFINITIONS</b>	
Definitions	<b>Egypt</b> 1- The Principle of “Equivalence” mentioned later in the texts is missing from the list of “Definitions” and needs to be added and explained. 2- also Egypt proposes to include a definition for <u>Food</u> to determine the scope of

Text	Comment by
	application of food legislations whether it will be before or after harvesting.
Definitions	<b>South Africa</b> Definitions should be arranged alphabetically
Definitions	<b>Mauritius</b> Definition for food safety appears twice.  the list of words in the definition section must be as per format for codex standards. ANY reason for the order being used currently?
the defined words should be in alphabetical order	<b>Botswana</b>
13. The following definitions are included to establish a common understanding of the terms used in this document unless the context otherwise requires:	<b>European Union</b> The EU would like to propose to extend the list of definitions of Paragraph 13 and include definitions for the following: <ul style="list-style-type: none"> <li>- Risk</li> <li>- Risk assessment</li> <li>- Risk management</li> <li>- Risk communication</li> <li>- Hazard</li> <li>- Traceability</li> </ul>
13. The following definitions are included to establish a common understanding of the terms used in this document unless the context otherwise requires:	<b>Rwanda</b> Propose to add definition of “food” as substance (ingredient), whether processed, semi-processed or raw, which is intended for consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of “food” but does not include cosmetics or tobacco or substances (ingredients) used only as drugs  Rationale: The definition of “food” should come first to avoid any ambiguity. Every day, there are new products defined as “new foods” (e.g., cultured meat), which require a clear legal framework.
13. The following definitions are included to establish a common understanding of the terms used in this document unless the context otherwise requires:	<b>Uganda</b> i. Food- Means any substance whether processed, semi processed or raw, which is intended for human consumption, and includes drink chewing gum and any substance which has been used in the manufacture, preparation or treatment of food but does not include cosmetics or substances used only as drugs (Codex Procedure Manual- 27th Edition- 2019)  Rationale: Helps the regulators and authorities to implement the guidelines
13. The following definitions are included to establish a common understanding of the terms used in this document unless the context otherwise requires:	<b>ICBA</b> The term “audit” is used later in the

Text	Comment by
	<p>document, therefore ICBA suggest adding a definition from CAC/GL 47-2003.</p> <p><u>i. Audit means a systematic and functionally independent examination to determine whether activities and related results comply with planned objectives. (CAC/GL 47-2003)</u></p> <p>ICBA suggests to reorder the definitions alphabetically.</p>
<p>13. The following definitions are included to establish a common understanding of the terms used in this document unless the context otherwise requires:</p>	<p><b>United Republic of Tanzania</b> <u>Proposal to define the word food, Para 13:</u></p> <p><u>New definition of food was introduced to read:</u></p> <p><u>Food- Means any substance whether processed, semi processed or raw, which is intended for human consumption, and includes drink chewing gum and any substance which has been used in the manufacture, preparation or treatment of food but does not include cosmetics or substances used only as drugs (Codex Procedure Manual- 27th Edition- 2019)</u></p> <p>Helps the regulators and authorities to implement the guidelines</p>
<p><del>Les 13. Dans un objectif d'harmonisation, les définitions suivantes sont données—apportées pour assurer une compréhension commune des termes utilisées dans le présent document, lorsque le contexte n'en requiert pas une autre</del><u>autrement:</u></p>	<p><b>Morocco</b></p>
<p>Les définitions suivantes sont données pour assurer une compréhension commune des termes utilisées dans le présent document, lorsque le contexte n'en requiert pas une autre:</p>	<p><b>Morocco</b></p> <p>Aliment (produit alimentaire): toute substance, transformée, semi-transformée ou brute, destinée à la consommation humaine, y compris les boissons, les chewing-gums ainsi que toute substance utilisée dans la production, la fabrication, la préparation ou le traitement de denrées alimentaires, à l'exclusion des substances employées uniquement sous forme de cosmétiques, de tabac ou de médicaments (OMS/FAO, 2016). La notion d'aliment, dans la visée de ces directives, englobe aussi ces directives l'aliment pour animaux qui désigne toute substance ou produit, y compris les additifs, transformé, partiellement transformé ou non transformé, destiné à l'alimentation des animaux par voie orale ;</p>
<p><u>i. Food- Means any substance whether processed, semi processed or raw, which is intended for human consumption, and includes drink chewing gum and any substance which has been used in the manufacture, preparation or treatment of food but does not include cosmetics or substances used only as drugs (Codex Procedure Manual- 27th Edition- 2019)</u></p>	<p><b>Nigeria</b></p> <p>Rationale: Helps the regulators and authorities to utilize the guidelines</p>
<p><b>Food business:</b> means any undertaking, whether for profit or not, public or private, carrying out any of the activities</p>	<p><b>Botswana</b></p>

Text	Comment by
related to any stage of <del>production, processing and distribution of food</del> the food supply chain. <sup>2</sup> .	
<b>Food business operator (FBO):</b> The entity responsible for operating a business at any step of the food chain (CXC 1-1969).	<b>Egypt</b> Egypt proposes to add a new legal drafting to the definition of the Food business operator “to ensure that the requirements of food legislation are met with the food business under their control”
<b>iii. Food control:</b>	
<b>Food control:</b> A mandatory regulatory activity of enforcement by national or local authorities to provide consumer protection and ensure that all food during production, handling, storage, processing and distribution are safe, wholesome and fit for human consumption; conform to food safety and quality requirements; and are honestly and accurately labelled as prescribed by the law <sup>3</sup> .	<b>Zambia</b> food control system should include packaging, sell and preparation
<b>Food control:</b> A mandatory regulatory activity of enforcement by national or local authorities to provide consumer <u>health</u> protection and ensure that all food during production, handling, storage, processing and distribution are safe, wholesome and fit for human consumption; conform to food safety and quality requirements; and are honestly and accurately labelled as prescribed by the law <sup>3</sup> .	<b>Somalia</b>
<b>iv. Legislation</b>	
<del>Legislation includes acts, regulations, requirements or procedures, issued by public authorities, related to foods and covering means the protection of public health, the protection of consumers and conditions of fair trading.</del> laws, regulations, requirements and/or procedures and administrative provisions governing food in general, and food safety in particular, issued by public authorities, and covering any stage of production, processing and distribution of food, the protection of public health, the protection of consumers and conditions of fair trading.	<b>European Union</b>
<b>Legislation</b> includes acts, regulations, requirements or procedures, issued by public authorities, related to foods and covering the protection of public health, <del>the protection of consumers health and conditions of facilitating fair trading</del> food trade.	<b>Somalia</b>
La <b>législation</b> comprend les lois, règlements, exigences ou procédures publiés par des autorités publiques au sujet des aliments et relatives à la protection de la santé publique, à la protection des consommateurs et aux pratiques commerciales loyales.	<b>Morocco</b>
<b>v. Food safety</b> means the assurance that food will not cause harm to the consumer when it is prepared and/or eaten according to its intended use (CXC 1-1969)	
<b>v. Food safety</b> means the assurance that food will not cause harm to the consumer when it is prepared and/or eaten according to its intended use (CXC 1-1969)	<b>Rwanda</b> Defined twice on v and x, therefore one should be deleted
<del><b>v. Food safety</b> means the assurance that food will not cause harm to the consumer when it is prepared and/or eaten according to its intended use (CXC 1-1969)</del>	<b>Nigeria</b> To be deleted since it is a repetition of x

Text	Comment by
<p><b>v. Food safety</b> means the assurance that food will not cause harm to the consumer when it is prepared and/or eaten according to its intended use (CXC 1-1969)</p>	<p><b>Egypt</b> Item v. is repeated again in item x. with a difference in the dates of the cited reference document. To harmonize between two definitions in one clause and remove the another one</p>
<p><b>v. Food safety</b> means the assurance that food will not cause <u>any</u> harm to the consumer when it is prepared and/or eaten according to its intended use (CXC 1-1969)</p>	<p><b>Somalia</b></p>
<p><b>Sécurité sanitaire des aliments:</b> assurance que les aliments <u>destinés aux humains ou aux animaux sont sans danger pour le consommateur quand ils sont préparés et/ou consommés conformément à l'usage auquel ils sont destinés (CXC 22R-1997) et assurance que les ditsaliments ne causeront pas d'effets nocifs pour le consommateur quand ils sont préparés et/ou consommés conformément à l'usage auquel ils sont destinés (CXC 1-1969).</u></p>	<p><b>Morocco</b> de préférence à déplacer en premier (i)</p>
<p><b>vi. Consumer</b> means persons and families purchasing and receiving food in order to meet their personal needs (CXS 1-1985).</p>	
<p><b>Consumer</b> means persons and families purchasing and receiving food in order to meet their personal needs (CXS 1-1985).</p>	<p><b>Rwanda .</b> Amend the definition to read consumer means persons receiving food in order to use them for their intended use.  Rationale: The consumer does not necessarily need to purchase the food in order to use them, some may receive them as donation.  Second, the use of food to meet personal needs may mislead for interpretation especially for those who may use food in contrary to its intended use. Therefore, we suggest to use the provided definition to insist on the use of food for only their intended use</p>
<p><b>Consommateur:</b> personnes et familles qui achètent et reçoivent des aliments <u>destinés à la consommation humaine pour satisfaire leurs besoins personnels (CXS 4-1985)1-1985 adapté).</u></p>	<p><b>Morocco</b></p>
<p><b>vii. Requirements</b> are the criteria set down by the competent authorities relating to trade in foodstuffs covering the protection of public health, the protection of consumers and conditions of fair trading. (CXG 47-2003)</p>	
<p><b>Requirements</b> are the criteria set down by the competent authorities relating to trade in foodstuffs covering the protection of public health, the protection of consumers and conditions of fair trading. (CXG 47-2003)</p>	<p><b>Rwanda</b> Remove trade of food stuff to add any stage of food chain  To read: "the criteria set down by the competent authorities relating to any stage of food chain covering the protection of public health, the protection of consumers and conditions of fair trading"  Rationale: Requirements may be set to cover any stage of the food chain as defined in xi</p>

Text	Comment by
<p><b>Requirements</b> are the criteria set down by the competent authorities relating to trade in foodstuffs covering the protection of public health, <del>the protection of consumers health and conditions of fair trading</del> <u>facilitate food trade</u>. (CXG 47-2003)</p>	<p><b>Somalia</b></p>
<p><del>Exigences</del> <b>Exigences (critères de conformité)</b>: critères fixés par les autorités compétentes en matière de <u>mise sur le marché et de commerce</u> des denrées alimentaires qui portent sur la protection de la santé publique, la protection des consommateurs et les pratiques commerciales loyales (CXG <del>47-2003</del>)47-2003 adapté).</p>	<p><b>Morocco</b></p>
<p><b>viii. Risk Analysis</b> - a process consisting of three components: risk assessment, risk management and risk communication. (Codex Procedural Manual 27<sup>th</sup> edition 2019)</p>	
<p>viii. <b>Risk Analysis</b> - a process consisting of three components: risk assessment, risk management and risk communication. (Codex Procedural Manual 27<sup>th</sup> edition 2019)</p>	<p><b>South Africa</b></p> <p>In addition to the definition of Risk Analysis there should be a definition for 'Risk' and 'Risk Assessment' as follows..."</p> <p>xiv. <b>Risk</b> means a function of the probability of an adverse health effect and the severity of that effect, consequential to a hazard (s) in food (Codex Procedural Manual: Definitions of Risk Analysis Terms Related to Food Safety).</p> <p>xvi. <b>Risk assessment</b> means a scientifically based process consisting of the following steps: (i) hazard identification, (ii) hazard characterization, (iii) exposure assessment, and (iv) risk characterization. (Codex Procedural Manual: Definitions of Risk Analysis Terms related to Food Safety)</p> <p>xviii. <b>Risk management</b> means the process, distinct from risk assessment, of weighing policy alternatives, in consultation with all interested parties, considering risk assessment and other factors relevant for the health protection of consumers and for the promotion of fair trade practices, and, if needed, selecting appropriate prevention and control options. (Codex Procedural Manual: Definitions of Risk Analysis Terms Related to Food Safety)</p> <p>xix. Risk communication means the interactive exchange of information and opinions throughout the risk analysis process concerning risk, risk-related factors and risk perceptions, among risk assessors, risk managers, consumers, industry, the academic community and other interested parties, including the explanation of risk assessment findings and the basis of risk management decisions. (Codex Procedural Manual: Definitions of Risk Analysis Terms Related to Food Safety)</p>

Text	Comment by
<b>Risk Analysis</b> - a <del>process consisting process</del> of identifying and analysing potential issues that could negatively affect the organizations operations. Risk analysis consist three major components: risk assessment, risk management and risk communication. (Codex Procedural Manual 27 <sup>th</sup> edition 2019)	<b>Somalia</b>
<b>Analyse des risques:</b> processus comportant trois volets volets interconnectés: évaluation des risques, gestion des risques et communication sur les risques (Manuel de procédure du Codex, 27 <sup>e</sup> édition, 2019).	<b>Morocco</b>
<b>Analyse des risques:</b> processus comportant trois volets: évaluation des risques, gestion des risques et communication sur les risques (Manuel de procédure du Codex, 27 <sup>e</sup> édition, 2019).	<b>Morocco</b> Ajouter vii. La mise sur le marché : désigne la détention d'aliments en vue de leur vente, y compris l'offre en vue de la vente ou toute autre forme de cession, à titre gratuit ou onéreux, ainsi que la vente, l'import, l'export, la distribution et les autres formes de cession proprement dites ;
<b>x. Food Safety</b> - the assurance that food and feed will not cause harm to the consumer when it is prepared or eaten according to its intended use (CXC 22R-1997)	
<b>Food Safety</b> - the assurance that food and feed will not cause harm to the consumer when it is prepared or eaten according to its intended use (CXC 22R-1997).	<b>Zambia</b> maintain only one definition of Food Safety since there is CXC 1-1969 and CXC 1-1997
<b>Food Safety</b> - the assurance that food and feed will not cause harm to the consumer when it is prepared or eaten according to its intended use (CXC 22R-1997)	<b>Uganda</b> To be deleted since it is a repetition of iv <u>Rationale: To be consistent with other codex texts.</u>
<del><b>Food Safety</b> - the assurance that food and feed will not cause harm to the consumer when it is prepared or eaten according to its intended use (CXC 22R-1997)</del>	<b>ICBA</b> ICBA proposes deletion as it is already covered under V.
<b>Food Safety</b> - the assurance that food and feed will not cause harm to the consumer when it is prepared or eaten according to its intended use (CXC <del>22R-1997</del> <u>22R-1997</u> )/(CXC 1-1969)	<b>Botswana</b> Definition repeated with tow different references
<b>Sécurité sanitaire des aliments:</b> assurance que les aliments destinés aux humains ou aux animaux sont sans danger pour le consommateur quand ils sont préparés et/ou consommés conformément à l'usage auquel ils sont destinés (CXC 22R-1997).	<b>Morocco</b> Ajouter xiv. Les étapes de la production, de la transformation et de la distribution sont toutes les étapes, dont l'importation, depuis et y compris la production primaire d'un aliment, jusque et y compris son entreposage, son transport, sa vente ou sa livraison au consommateur final, ainsi que, le cas échéant, l'importation, la production, la fabrication, l'entreposage, le transport, la distribution, la vente et la livraison des aliments pour animaux ;  répétition
<b>xii. Food Control System</b> - the integration of a mandatory regulatory approach with preventive and educational strategies that protect the whole food chain <sup>2</sup>	
<b>Food Control System</b> - the integration of a mandatory regulatory approach with preventive and educational	<b>Rwanda</b>

[57]<sup>2</sup> Food control system assessment tool, FAO/WHO 2019

Text	Comment by
strategies that protect the whole food chain <sup>4</sup> 'from food safety hazards'	<b>Rationale:</b> The addition of "from food safety hazards" would complete this definition otherwise it seems incomplete
<p><b>Food Control System</b> - the integration of a mandatory regulatory approach with preventive and educational strategies that protect the whole food chain<sup>4</sup></p>	<p><b>Uganda</b></p> <p>The integration of regulatory activities across all responsible competent authorities to achieve the key objectives of food control, including preventive and educational strategies that protect the whole food chain</p> <p>Rationale: To be consistent with other codex texts</p>
<p><b>xiii. Official control</b> - any form of control that the competent authority performs for the verification of compliance with food law, including animal health and animal welfare rules<sup>3</sup>.</p>	
<p><b>Official control</b> - any form of control that the competent authority performs for the verification of compliance with food law, including animal health and animal welfare rules<sup>5</sup>.</p> <p><u>ix. Food hygiene:</u> All conditions and measures necessary to ensure the safety and suitability of food at all stages of the food chain (CXC 1-1969). ICBA proposes insertion of the text aligned to GENERAL PRINCIPLES OF FOOD HYGIENE CXC 1-1969.</p> <p><u>xi. Hazard</u> means a biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect (Codex Procedural Manual: Definitions of Risk Analysis Terms related[A1] to Food Safety).</p> <p><u>xiv. Risk</u> means a function of the probability of an adverse health effect and the severity of that effect, consequential to a hazard(s) in food (Codex Procedural Manual: Definitions of Risk Analysis Terms Related to Food Safety).</p> <p><u>xvi. Risk assessment</u> means a scientifically based process consisting of the following steps: (i) hazard identification, (ii) hazard characterization, (iii) exposure assessment, and (iv) risk characterization. (Codex Procedural Manual: Definitions of Risk Analysis Terms related to Food Safety)</p> <p><u>xvii. Risk assessment policy:</u> Documented guidelines on the choice of options and associated judgements for their application at appropriate decision points in the risk assessment such that the scientific integrity of the process is maintained</p> <p><u><sup>6</sup>xviii. Risk management</u> means the process, distinct from risk assessment, of weighing policy alternatives, in consultation with all interested parties, considering risk assessment and other factors relevant for the health protection of consumers and for the promotion of fair trade practices, and, if needed, selecting appropriate prevention and control options. (Codex Procedural Manual: Definitions[A4] of Risk Analysis Terms Related to Food Safety)</p> <p><u>xix. Risk communication</u> means the interactive exchange of information and opinions throughout the risk analysis process concerning risk, risk-related factors and risk perceptions, among risk assessors, risk managers, consumers, industry, the academic community and other</p>	<p><b>ICBA</b></p> <p>ICBA set the numerical labels in the order the definitions would be if the definitions were in alphabetical order.</p>

[59]<sup>3</sup> Food control system assessment tool, FAO/WHO 2019

Text	Comment by
interested parties, including[A5] the explanation of risk assessment findings and the basis of risk management decisions. (Codex Procedural Manual: Definitions of Risk Analysis Terms Related to Food Safety) <sup>6</sup> Codex Alimentarius Commission Procedural Manual, FAO and WHO, 2019.	
<b>Contrôle officiel:</b> toute forme de contrôle que l'autorité compétente exerce pour vérifier la <del>conformité</del> <u>sécurité sanitaire</u> avec <u>les exigences de la législation</u> applicable aux denrées alimentaires, y compris avec les dispositions relatives à la santé animale et au bien-être des animaux. Cette définition englobe aussi la certification sanitaire des aliments. <sup>[5]</sup> .	<b>Morocco</b>
<b>SECTION 5 – PRINCIPLES OF A FOOD SAFETY LEGISLATION</b>	
<b>PRINCIPLES OF A FOOD SAFETY LEGISLATION</b>	<b>Rwanda</b> Add principle 10  <b>No-hindrance to trade Principle</b> The food safety legislation should aim at avoiding to pose any hindrance to trade either in form of tariff or non-tariff barrier  <b>Rationale:</b> It has been observed that some legislation set exorbitant cost to the food business operators for compliance purpose however with no evident justifications.  This may be in contrast with TBT agreement signed by country members
14. In developing and/or updating food safety legislation, member countries should be guided by the principles in these Guidelines and <u>by</u> their legal drafting traditions.	<b>Egypt</b> To add “by” to read, “... and by their ...”
14. In developing and/or updating food safety legislation, member countries should be guided by the principles in these Guidelines and their legal drafting <del>traditions.</del> <u>practices</u>	<b>South Africa</b>
15. It is recommended that the process of developing <u>and/ or updating</u> a food safety legislation should be open to consultation with <u>all</u> stakeholders such as consumers, producers, food industry, consumers associations, NGOs, academia and research among others, while respecting legal requirements to protect confidential information as appropriate.	<b>South Africa</b> add the words after developing,...and/ or updating a food safety legislation....  before the word stakeholders add the word 'all' to read all stakeholders  reference (CXG 82-2013)
15. It is recommended that the process of developing a food safety legislation should be open to consultation with stakeholders such as consumers <del>s</del> , producers, food industry, consumers associations, NGOs, academia and research among others, while respecting legal requirements to protect confidential information as appropriate.	<b>Egypt</b> To be gramatically correct, “consumers” is to be written in the singular. To remove the “s” from “consumers”.
15. It is recommended that the process of developing a <u>and/or updating</u> food safety legislation should be open to <u>public</u> consultation with <u>all</u> stakeholders such as consumers, producers, food industry, consumers associations, NGOs, academia and research among others, while respecting legal requirements to protect confidential information as appropriate.	<b>ICBA</b>
16. In cases where relevant scientific evidence is insufficient, a Member may provisionally adopt sanitary or phytosanitary measures on the basis of available pertinent information, including that from the relevant international organizations as	<b>Egypt</b> To revise sentence to read, “...academia and research institutions,” adding a comma after institutions. This serves to draw

Text	Comment by
well as from sanitary or phytosanitary measures applied by other Members. In such circumstances, Members shall seek to obtain the additional information necessary for a more objective assessment of risk and review the sanitary or phytosanitary measure accordingly within a reasonable period of time (WTO SPS agreement Article 5, para 7)	attention to importance of research. Otherwise, the term "academia" covers both universities and research institutions, which renders the word "research" redundant and it can be removed.
15. Dans les cas où les preuves scientifiques pertinentes seront insuffisantes, un Membre peut provisoirement adopter des mesures sanitaires ou phytosanitaires sur la base des renseignements pertinents disponibles, y compris ceux qui émanent des organisations internationales compétentes ainsi que ceux qui découlent des mesures sanitaires ou phytosanitaires appliquées par d'autres Membres. Dans de telles circonstances, les Membres s'efforceront d'obtenir les renseignements additionnels nécessaires pour procéder à une évaluation plus objective du risque et examineront en conséquence la mesure sanitaire ou phytosanitaire dans un délai raisonnable (Accord sur l'application des mesures sanitaires et phytosanitaires [SPS] de l'Organisation mondiale du commerce [OMC], article 5, par.7).	<b>Morocco</b> A déplacer après le paragraphe 30 au niveau du principe 9.
8. Parties should seek to obtain the scientific information necessary to reduce uncertainty and justify provisional measures.	
17. Member Countries <del>Parties</del> should seek to obtain the scientific information necessary to reduce uncertainty and justify provisional measures.	<b>Nigeria</b> Rationale: The 'parties' being referred to here are actually Member countries
Egypt proposes a new legal drafting :  Members should use the best independent scientific resources available to reduce uncertainty and justify provisional measures	<b>Egypt</b>
Parties should seek to obtain the scientific information necessary to reduce uncertainty and justify provisional measures.	<b>South Africa</b> Which "Parties" are we referring to as in the entire document we have been referring to "Members"?
Les parties s'efforceront d'obtenir les informations scientifiques nécessaires pour réduire l'incertitude et justifier les mesures provisoires.	<b>Morocco</b> A déplacer au niveau du principe 9
Member Countries should seek to obtain the scientific information necessary to reduce uncertainty and justify provisional measures.	<b>Uganda</b> Rationale: The 'parties' being referred to here are actually Member countries
<b>PRINCIPLE 1 - CONSUMER PROTECTION</b>	
<b><u>PRINCIPLE 1 - CONSUMER PROTECTION — OF CONSUMERS' INTEREST</u></b>	<b>European Union</b>
19. Food safety legislation should have provisions for protecting the health of consumers as a top/primary <del>priority</del> priority and shall provide a basis for consumers to <u>make informed choices in relation to the foods they consume. It shall aim at the prevention of fraudulent practices, the adulteration of food and any other practices which may mislead the consumer.</u>	<b>European Union</b>

Text	Comment by
<b>PRINCIPLE 2 – THE FOOD CHAIN APPROACH</b>	
20. The food safety legislation should cover the entire food chain from primary production to consumption	
<b>PRINCIPLE 2 – THE FOOD CHAIN APPROACH</b>	<b>European Union</b> New PRINCIPLE 2bis – THE ONE HEALTH APPROACH The food safety legislation should apply a One Health approach that will to detect, prevent and respond to emerging diseases at the human-animal-environment interface so as to address food related public health issues more effectively.
20. The food safety legislation should cover the entire food chain from primary production to consumption	<b>Egypt</b> Egypt proposes a new legal drafting: <u>The food legislation shall cover all aspects of the food chain and consider food handling which includes: production, manufacture, transport and distribution.</u>
20. La législation relative à la sécurité sanitaire des aliments devrait concerner l'ensemble de la chaîne alimentaire, de la production primaire à la consommation. <a href="#">La notion de chaîne alimentaire peut intégrer la question de la durabilité alimentaire.</a>	<b>Morocco</b>
<b>PRINCIPLE 3 - ROLES AND RESPONSIBILITIES</b>	
21. The administrative provisions of food safety legislation should clearly define roles and responsibilities of the stakeholders. These roles and responsibilities may be as follows:	
<b>ROLES AND RESPONSIBILITIES</b>	<b>European Union</b> An additional point should be included about the enforcement of food safety legislation with a clarification who shall ensure that.
<b>ROLES AND RESPONSIBILITIES</b>	<b>Rwanda</b> The role of farmers is missing. The section should also define the roles and responsibilities of primary producers (i.e., in the African context the roles of farmers)
21 (a) The food business operators have the primary role and responsibility for managing the safety of their products and compliance with requirements relating to those aspects of food under their control.	
(a) The food business operators have the primary role and responsibility for managing the safety of their products and compliance with requirements relating to those aspects of food under their control.	<b>Egypt</b> Egypt proposes a new legal drafting: <u>Food business operators at all stages of production, processing and distribution within the businesses under their control shall ensure that foods satisfy the requirements of food legislation which are relevant to their activities and shall verify that such requirements are met. And collaborate with the responsible Authorities on action taken to avoid or reduce risks posed by a food which they supply or have supplied</u>
Il incombe en premier lieu aux exploitants du secteur alimentaire de veiller à la sécurité sanitaire <del>de leurs produits</del> des aliments qu'ils mettent sur le marché et de s'assurer que	<b>Morocco</b>

Text	Comment by
les exigences relatives aux aspects sur lesquels ils ont prise sont respectées.	
21 (b) The <u>national government</u> has the role and responsibility to establish and maintain up to date legal requirements and verify that food business operators comply with food safety legislation.	<b>European Union</b>
21 (b) Le gouvernement ( <u>Autorité compétente</u> ) a pour rôle et responsabilité de <u>mettre en place une politique nationale de SSA, de définir et de mettre à jour des exigences légales et réglementaires de SSA de vérifier que les exploitants du secteur alimentaire respectent la législation relative à la sécurité sanitaire des aliments. ces exigences.</u>	<b>Morocco</b>
21 (c) Consumers have a role in managing food safety <u>associated risks</u> including products under their control and where appropriate they should be provided with information on how to achieve this.	<b>Somalia</b>
21 (c) Consumers have a role <u>and responsibility in</u> managing food safety risks including products under their control and where appropriate they should be provided with information on how to achieve this.	<b>Uganda</b> Rationale: For emphasis
21 (c) Les consommateurs ont un rôle à jouer dans la gestion des risques de sécurité sanitaire liés aux aliments sous leur contrôle et devraient, s'il y a lieu, recevoir des informations sur la manière d'y parvenir. <u>Les associations représentatives des consommateurs sont responsables d'éduquer les consommateurs sur la culture d'hygiène et de SSA.</u>	<b>Morocco</b>
21 (d) Academic and <del>R</del> research institutions have a role in contributing to a food safety legislation, as they are a source of expertise to support the risk based and scientific foundation of such a system.	<b>Egypt</b>
21 (d) Academic and Research institutions have a role in contributing to a food safety <del>legislation,</del> <u>legislation and food safety awareness to the public as they are a the source of expertise to support that can potentially elaborate the risk based and scientific foundation of such a system risks associated with unsafe food consumption.</u>	<b>Somalia</b>
21 (d) Les établissements universitaires <del>et</del> de recherche ont un rôle à jouer en contribuant à une législation relative à la sécurité sanitaire des aliments, car ils sont la source de connaissances spécialisées qui permettent d'asseoir les fondements scientifiques et de gestion des risques sur lesquels repose un tel <del>système</del> système de la législation SSA.	<b>Morocco</b>
<b>PRINCIPLE 4 – SCIENCE BASED LEGISLATION</b>	
22. Food safety legislation should be informed by sound scientific evidence. The legislation should make provisions for collecting and analysis of data, scientific information and evidence.	
22. Food safety legislation should be informed by sound scientific evidence. The legislation should make provisions for collecting and analysis of data, scientific information and evidence.	<b>South Africa</b>  23. Risk analysis principles should form the foundation on which food safety legislation is based. The legislation should make provisions for collecting data, scientific information and evidence. In formulating legislation, there should be focus on risk-based approach. (CXG 62-2007)

Text	Comment by
	<p>24. Risk analysis should be applied consistently; open, transparent and documented; evaluated and reviewed as appropriate in the light of newly generated scientific data (CXG 62-2007)<sup>7</sup></p> <p>- after the words scientific evidence add the words.. 'following the risk analysis approach'</p> <p>i.e. Food safety legislation should be informed by sound scientific evidence <u>following the risk analysis approach</u>. The legislation should make provisions for collecting and analysis of data, scientific information and evidence.</p>
<p>Food safety legislation should be <del>informed by</del> based on a sound scientific evidence. The legislation should make provisions for collecting and analysis of data, scientific information and evidence.</p>	<p><b>Somalia</b></p>
<p>ICBA proposes insertion of risk analysis and risk-based approach to setting standards as it is aligned with Codex Principles. ICBA also suggests to add the Risk Analysis Principles as footnote 7.</p> <p>Food safety legislation should be informed by sound scientific <del>evidence</del> evidence following the risk analysis <u>approach</u>. The legislation should make provisions for collecting and analysis of data, scientific information and evidence. <u>Risk analysis principles should form the foundation on which food safety legislation is based. The legislation should make provisions for collecting data, scientific information and evidence. In formulating legislation, there should be focus on risk-based approach. (CXG 62-2007)<sup>7</sup>Risk analysis should be applied consistently; open,transparent and documented; evaluated and reviewed as appropriate in the light of newly generated scientific data (CXG 62-2007)<sup>7</sup>Working Principles for Risk Analysis for Food Safety for Application by Governments (CXG 62-2007)</u></p>	<p><b>ICBA</b></p>
<p>La législation relative à la sécurité sanitaire des aliments devrait reposer sur des données scientifiques fiables. Elle devrait comporter des dispositions concernant la collecte et l'analyse de données, d'informations et de preuves scientifiques. <u>Cette analyse vise la production de preuves scientifiques objectives, après un examen approfondi de toutes les données pertinentes, de façon que ladite législation garantie la qualité et la sécurité sanitaire des approvisionnements alimentaires ;23. La législation devrait prévoir des dispositions pour la collecte de données, d'informations scientifiques et de preuves. Les évaluations de risques doivent dans toute la mesure du possible faire appel aux informations quantitatives disponibles et la caractérisation des risques doit être présentée de manière immédiatement compréhensible et utile ;24. Il faudrait admettre que certaines préoccupations légitimes des Gouvernements, autre que la science, au moment de l'élaboration de leur législation nationale ne sont pas applicables d'une manière générale, ni valables dans l'Afrique entière.</u></p>	<p><b>Morocco</b></p>

Text	Comment by
<b>PRINCIPLE 5 - COOPERATION AND COORDINATION</b>	
23. The food safety legislation should provide for a mechanism for effective communication and coordination among the different institutions and organizations responsible for food safety along the food chain.	
The food safety legislation should provide for a mechanism for <u>transparent and effective</u> communication and coordination among the different institutions and organizations responsible for food safety along the food chain.	<b>Nigeria</b> Rationale: There was need to emphasize transparency as one of the pillars of principle 5.
The food safety legislation should provide for a mechanism for <u>transparent and effective</u> communication and coordination among the different institutions and organizations responsible for food safety along the food chain.	<b>Uganda</b> Rationale: There was need to emphasise transparency as one of the pillars of principle 5.
La législation relative à la sécurité sanitaire des aliments devrait prévoir un mécanisme permettant une communication et une coordination efficaces entre les différentes institutions et organisations chargées de la sécurité sanitaire des aliments tout le long de la chaîne alimentaire.	<b>Morocco</b> 26.Cette coopération peut consister en: a) une coopération aux premiers stades de la rédaction de la législation en question; b) une coopération au moyen d'un échange mutuel d'informations et de données et d'une participation aux réunions inter-institutions ;
<b>PRINCIPLE 6 – EQUIVALENCE</b>	
24. The principle of equivalence should be provided for in the food safety legislation. This recognition can apply at both the regional and international level. Mutual recognition, where applicable, should be applied to facilitate trade.	
<u>PRINCIPLE 6 Communication, awareness, and education</u> The food safety legislation should have provisions to support food safety education, communication, and training.	<b>Nigeria</b> Rationale: Food safety being everyone business, it is imperative that every stakeholder are well educated and informed in order to play their role in implementing food safety legislation.
<b>PRINCIPLE 6 – EQUIVALENCE</b> <u>Principle 6- Communication, awareness, and education</u> The food safety legislation should have provisions to support food safety education, communication, and training.	<b>United Republic of Tanzania</b> Proposal to include a new Principle 6 on Communication, awareness and education to read ;
<b>PRINCIPLE 6 – EQUIVALENCE</b>	<b>Uganda</b> Proposal to include a new Principle 6 on Communication, awareness and education to read ;  <u>Principle 6- Communication, awareness, and education</u>  <u>The food safety legislation should have provisions to support food safety education, communication, and training.</u>  Rationale: Agriculture and food producers have a role of implementing good practices during production and therefore this principle covers need to communicate the legislation, educate, and train the stakeholders.

Text	Comment by
PRINCIPLE 6 - EQUIVALENCE	<b>Egypt</b> This is the Principle that is to be added to the list of "Definitions" under SECTION 4
<b><u>PRINCIPLE 6 – EQUIVALENCERECOGNITION OF OTHER SYSTEMS (INCLUDING EQUIVALENCE)</u></b>	<b>ICBA</b> ICBA suggest including the same title as is in Principle 10 of CXG 82 - RECOGNITION OF OTHER SYSTEMS (INCLUDING EQUIVALENCE) since it includes recognition that other systems, although designed and structured differently may be capable of meeting the same objective.
<p>24. The <b>principle of equivalence</b> should be provided for in the food safety legislation. This recognition can apply at both the regional and international level. Mutual recognition, where applicable, should be applied to facilitate trade.</p>	<b>South Africa</b> addition to this principles should be.... 25. <u>Competent authorities should recognize that food control systems or their components although designed and structured differently may be capable of meeting the same objective. This recognition can apply at the national and international level. The concept of recognition of systems, including equivalence, should be provided for in the national food control system (CXG 82-2013).</u> It might be necessary to define the "Principle of equivalence
<p>The principle of equivalence should be provided for in the food safety legislation. This recognition can apply at both the regional and international level. Mutual recognition, where applicable, should be applied to facilitate trade. <u>A product lawfully marketed in one CCAFRICA Member State and not subject to harmonization should be allowed to be marketed in any other CCAFRICA Member State, even when the product does not fully comply with the technical rules of the Member State of destination. However, the Member State of destination may refuse the marketing of a product only where this is strictly necessary for the protection of, for example, public safety, health or environment. Competent authorities should recognise that food control systems or their components although designed and structured differently may be capable of meeting the same objective. This recognition can apply at the national and international level. The concept of recognition of systems, including equivalence, should be provided for in the national food control system (CXG 82-2013).</u></p>	<b>ICBA</b> While ICBA supports including additional text on mutual recognition, we suggest adding more detail subject to recognition of equivalence of national food control systems, e.g., CXG 34-1999 and CXG 53-2003).
<p><u>27. Le principe d'équivalence devrait être prévu dans la législation SSA des membres du Comité. Ce principe vise la détermination et à la reconnaissance de l'équivalence de mesure (s) sanitaire (s) ou de systèmes d'inspection et de certification en totalité pour faciliter davantage le commerce</u></p> <p><u>28. La détermination de l'équivalence suppose un processus séquentiel d'échange d'informations et d'évaluation. Il s'agit généralement d'une procédure convenue entre les parties contractantes importatrice et exportatrice. Les informations sont fournies sous une forme qui permet d'évaluer comment les mesures sanitaires existantes et proposées permettent</u></p>	<b>Morocco</b>

Text	Comment by
<p>d'atteindre le niveau de protection approprié de la partie contractante importatrice ;</p> <p>29. La reconnaissance mutuelle de l'équivalence peut s'appliquer au niveau régional (entre les membres du Comité) à ou international (entre des membres du Comité et d'autres pays du monde). <del>La législation relative à la sécurité sanitaire des aliments devrait tenir compte du principe d'équivalence, aux niveaux régional comme international. Il convient d'appliquer la reconnaissance mutuelle, le cas échéant, pour faciliter le commerce.</del></p>	
<b>PRINCIPLE 7 - LEGAL/POLICY FRAMEWORK</b>	
25. Food safety legislation should be part of a robust policy framework, and mechanisms for its regular review and updates should be provided for.	
<b>PRINCIPLE 7 - LEGAL/POLICY FRAMEWORK</b>	<p><b>Mauritius</b></p> <p>would this include regulatory impact assessment?</p>
25. Food safety legislation should be part of a robust policy framework, and mechanisms for its regular review and updates should be provided for.	<p><b>Egypt</b></p> <p>It is important here to mention that “robust” refers to the “national” and not to related regional or international policy frameworks. It is therefore important to add “national” to read, “... robust national policy framework, and ...”</p>
Food safety legislation should be part of a robust policy framework, and mechanisms for its regular review and updates should be <del>provided for</del> <u>consistent</u> .	<b>Somalia</b>
<b>PRINCIPLE 8 – HARMONISATION</b>	
26. When designing a food safety legislation, CCAFRICA member countries should aim at the harmonized approach to facilitate the Intra-African trade.	
26. When designing a food safety legislation, CCAFRICA member countries should aim at the harmonized approach to facilitate the Intra-African trade	<p><b>South Africa</b></p> <p>This principle should also be clearly spelled out. Some Member countries have provisions in their legislation, which requires listing or registration of products, whereas some only requires compliance with Regulations. e.g. There are countries within CCAFRICA which requires Certificate of Free Sale, which are not issued in countries which do not register or list the products</p>
26. When designing a food safety legislation, CCAFRICA member countries should aim at the harmonized approach to <u>ensure consumer protection and</u> facilitate the <del>Intra-African</del> <u>Intra/inter-African</u> trade.	<b>Nigeria</b>
When designing a food safety legislation, CCAFRICA member countries should aim at <u>applying</u> the harmonized approach to facilitate the Intra-African trade.	<b>Egypt</b>
When designing a food safety legislation, CCAFRICA member countries should aim at the harmonized approach to facilitate the Intra-African <del>trade.</del> <u>trade and protect consumers health</u>	<b>Somalia</b>

Text	Comment by
27. Codex texts, WTO recommendations and guidelines (SPS and TBT Agreements), where applicable, should be considered by CCAFRICA member countries when drafting/updating national food safety legislations in order to protect the health of consumers and ensure fair practices in food trade.	
Codex texts, WTO recommendations and guidelines (SPS and TBT Agreements), where applicable, should be considered by CCAFRICA member countries when drafting/updating national food safety legislations. in order to protect the health of consumers and ensure fair practices in food trade.	<b>Egypt</b> The sentence is to end with "legislations." deleting the remaining explanatory phrase as it does not add to the "harmonization" objective of the item.
<del>Codex texts</del> <u>standards, guidelines, codes of practice</u> , WTO recommendations and guidelines (SPS and TBT Agreements), where applicable, should be considered by CCAFRICA member countries when drafting/updating national food safety legislations in order to protect the health of consumers and ensure fair practices in food trade. <u>In absence of specific national food safety regulations, Codex standards, guidelines or codes of practice should be accepted to ensure protecting the health of the consumers and ensuring fair practices in the food trade.</u>	<b>ICBA</b>
<b>PRINCIPLE 9 - PRECAUTIONARY PRINCIPLE</b>	
<b><i>PRINCIPLE 9 - PRECAUTIONARY PRINCIPLE</i></b>	<b>FIVS</b> FIVS notes the inclusion of the precautionary principle in this new draft, which was absent in previous versions of the text. FIVS is concerned that the precautionary principle may inadvertently impose unnecessary restrictions on trade. There is no common understanding of the precautionary principle, meaning that its inclusion in this draft may lead to different interpretations by countries, and negatively impact trade. This goes against the objectives stated in paragraph 29. In addition, FIVS is unaware of other regional or commodity-specific Codex guidelines that include the precautionary principle. Therefore FIVS suggests removing the precautionary principle from the text.
<b><i>PRINCIPLE 9 - PRECAUTIONARY PRINCIPLE</i></b>	<b>South Africa</b> There is always divergent interpretation of "Precautionary Principles". Maybe there should be a common definition to avoid such divergence for the purpose of these Guidelines. Some take is a taking a preventative action when there is uncertainty, whereas others say it is used to shift burden of proof to quantify risks.
<b><i>PRINCIPLE 9 - PRECAUTIONARY PRINCIPLE</i></b> <b><u>PREVENTATIVE MEASURES</u></b>	<b>ICBA</b> ICBA proposes replacement of term and definition thereunder of Precautionary Principle as it is not part of Working Principles for Risk Analysis for Food Safety for Application by Governments (2007) document by Codex Alimentarius.

Text	Comment by
<p>28 The food safety legislation should have a provision for interim risk management measures, in special cases, where there is no information or an assessment of the available information reveals the possibility of adverse health effects, but where scientific uncertainty remains.</p>	<p><b>Egypt</b></p> <p>For paragraph 28, it is proposed to rewrite the whole text to bring forward the issue of “scientific uncertainty”, to read: “</p> <p><u>The food safety legislation should have a provision for interim risk management measures to apply in situations where scientific uncertainty remains. This involves special cases where there is no information or when an assessment of the available information reveals the possibility of adverse health effects.”</u></p>
<p>28. The food safety legislation should have a provision for interim risk management measures, in special cases, where there is no information or an assessment of the available information reveals the possibility of adverse health effects, but where scientific uncertainty remains.</p>	<p><b>Egypt</b></p> <p>To remove the 2 commas as they are not needed. To read, “... measures in special cases where ...”</p>
<p>28. The food safety legislation should have a provision for interim risk management measures, in special cases, where there is no information or an assessment of the available information reveals the possibility of adverse health effects, but where scientific uncertainty remains.</p>	<p><b>South Africa</b></p> <p>The risk management measures should be clearly spelled out and measures the Country A uses may be different to Country B and C</p>
<p><del>28 To prevent and when necessary to respond to food safety incidents. The food safety legislation should have a provision for interim risk management measures, in special cases, where there is no information or an assessment of encompass the available information reveals the possibility core elements of adverse health effects prevention, but where scientific uncertainty remains intervention, and response.</del></p>	<p><b>ICBA</b></p>
<p>28 La législation relative à la sécurité sanitaire des aliments devrait prévoir des mesures provisoires de gestion des risques dans les cas particuliers où on ne dispose d'aucune information ou lorsque l'évaluation des informations disponibles révèle de possibles effets nocifs pour la santé, mais l'incertitude du point de vue scientifique demeure.</p>	<p><b>Morocco</b></p> <p>34. Dans les cas où les preuves scientifiques pertinentes seront insuffisantes, un Membre peut provisoirement adopter des mesures sanitaires ou phytosanitaires sur la base des renseignements pertinents disponibles, y compris ceux qui émanent des organisations internationales compétentes ainsi que ceux qui découlent des mesures sanitaires ou phytosanitaires appliquées par d'autres Membres. Dans de telles circonstances, les Membres s'efforceront d'obtenir les renseignements additionnels nécessaires pour procéder à une évaluation plus objective du risque et examineront en conséquence la mesure sanitaire ou phytosanitaire dans un délai raisonnable (Accord sur l'application des mesures sanitaires et phytosanitaires [SPS] de l'Organisation mondiale du commerce [OMC], article 5, par. 7) ;</p> <p>35. Lorsqu'une action urgente est indispensable pour protéger la vie et la santé humaine, l'environnement ou faire cesser une perturbation grave liée au commerce</p>

Text	Comment by
	<p>équitable, (situations d'urgence), l'autorité compé-tente peut prendre des mesures provisoires de gestion des risques ;</p> <p>36. Les parties s'efforceront d'obtenir les informations scientifiques nécessaires pour réduire l'incertitude et justifier les mesures provisoires</p>
29. The measures adopted should be proportionate to the risk and not impose unnecessary restrictions on trade and shall not be applied indefinitely.	<p><b>European Union</b></p> <p>In addition the EU would like to suggest to include a new principle on "TRANSPARENCY".</p>
29 The measures adopted should be proportionate to the risk and not impose unnecessary restrictions on trade and shall not be applied indefinitely.	<p><b>Egypt</b></p> <p>Egypt proposes to add a new principle on Transparency.</p> <p>A new legal drafting:</p> <p>Responsible Authorities shall ensure that they carry out their activities with a high level of transparency.</p>
29. The measures adopted should be proportionate to the <u>health risk level of</u> and not impose unnecessary restrictions on trade and shall not be applied indefinitely.	<p><b>Somalia</b></p>
<p><b>PRINCIPLE 10 - CONSISTENCY AND IMPARTIALITY</b></p> <p><u>All aspects of a national food safety legislation should be applied consistently and impartially. The competent authority and all participants acting in official functions should be free of improper or undue influence or conflict of interest.</u><del>The measures adopted should be proportionate to the risk and not impose unnecessary restrictions on trade and shall not be applied indefinitely.</del></p>	<p><b>ICBA</b></p> <p>ICBA proposes adding Consistency and Impartiality to the Table of Contents. Renumber to Principle 10.</p> <p>The principle of consistency and impartiality is included in CXG 82-2-13 as Principle 5. We suggest including this important principle slightly modified to fit in the text.</p>
<b>SECTION 6 – ELEMENTS OF FOOD SAFETY LEGISLATION</b>	
<b>SECTION 6 – ELEMENTS OF FOOD SAFETY LEGISLATION</b>	<p><b>European Union</b></p> <p>The draft guideline should also describe beside the principles, the general requirements of food safety legislation, i.e. that food shall not be placed on the market if it is unsafe. The future food safety legislation should then describe when a food deemed to be unsafe, and what needs to be taken into account by determining whether any food is unsafe.</p>
30. Food safety legislation should be consistent with the legal drafting <del>traditions</del> <u>practices</u> of CCAFRICA member countries upon which all other regulatory instruments are based. The regulatory instruments should be designed with the specific purpose of consumer health protection and/or the promotion of fair practices in food trade.	<p><b>South Africa</b></p> <p>As mentioned before this should read legal drafting practices instead of traditions</p>
30. Food safety legislation should be consistent with the legal drafting traditions of CCAFRICA member countries upon which all other regulatory instruments are based. The <del>regulatory instruments</del> <u>drafting traditions</u> should be designed with the specific purpose of consumer health protection and/or the promotion of fair practices in food trade.	<p><b>ICBA</b></p>

Text	Comment by
30. La législation relative à la sécurité sanitaire des aliments devrait être conforme aux traditions <u>juridiques</u> des pays membres du Comité en matière de rédaction de lois sur lesquelles sont fondés tous les autres <del>instruments de réglementation</del> <u>dispositions réglementaires inférieures</u> . <del>Les instruments de réglementation ces dispositions</del> devraient être conçus spécialement aux fins de la protection de la santé des consommateurs et/ou de la promotion de pratiques loyales dans le commerce des produits alimentaires.	<b>Morocco</b>
<b>The food safety legislation should have the following elements:</b>	
Le titre de la législation relative à la sécurité sanitaire des aliments devrait donner une idée du champ d'application et de l'objectif de la législation proposée. <u>Pour remplir sa fonction pédagogique, l'intitulé de la loi doit être explicite</u>	<b>Morocco</b>
<u>Visas/Introduction/préambule</u>	<b>Morocco</b>
<p><i>ii. Introduction/preamble</i></p> <p>The food safety legislation should contain an introductory statement that explains the purpose and implementation of the law.</p>	
La législation relative à la sécurité sanitaire des aliments <del>devrait comporter</del> <u>peut comporter:</u> a) <u>Des visas qui désigne cette partie figurant en tête d'une loi par laquelle le législateur énonce les références des textes de lois ou des règlements administratifs auxquels, ils se réfèrent.Exemple: "Vu l'article x de la Constitution.</u> b) <u>une introduction (ou un préambule) où figurent des explications sur son objectif et sa mise en œuvre.</u>	<b>Morocco</b>
<i>iii. Interpretation of terms</i>	
It <del>must</del> <u>should</u> provide a list of key terms and their definitions as used in the body of the legislation. The definitions should be aligned to internationally accepted texts as well as ensuring their clarity and without ambiguity.	<b>South Africa</b> We recommend using "should" as this is a guidance document vs "must" which is stronger language
It <del>must</del> <u>should</u> provide a list of key terms and their definitions as used in the body of the legislation. The definitions should be aligned to internationally accepted texts as well as ensuring their clarity and without ambiguity.	<b>ICBA</b> ICBA recommends using "should" as this is a guidance document vs "must" which is stronger language
La législation <del>doit</del> <u>peut</u> contenir une liste des termes <u>juridiques</u> importants accompagnés de définitions indiquant le sens qu'ils ont dans le corps du texte. Les définitions devraient <u>dans la mesure du possible</u> être conformes aux textes acceptés au niveau international, claires et <del>sans éviter</del> <u>toute ambiguïté.</u>	<b>Morocco</b>
<i>Objective of the food safety legislation</i>	
<i>Objective of the food safety legislation</i>	<b>Uganda</b> The legislation should state clear objectives including the role of risk analysis. The objectives should include ensuring the safety of food intended for human consumption, anticipation/prediction, prevention and control of food-borne diseases, facilitation of food trade and contribution to the development of sustainable agri-food sector/system.

Text	Comment by
	Rationale: the food safety legislation should consider anticipatory actions that will complement any other preventive controls, place emphasis on sustainability issues for better clarity of the statement.
<del>Objectif</del> <u>Le champ d'application et les Objectifs de la législation relative à la sécurité sanitaire des aliments</u>	<b>Morocco</b>
iv. The legislation should state clear objectives including the role of risk analysis. The objectives should include; ensuring the safety of food intended for human consumption, prevention and control of food-borne diseases, facilitation of food trade and contribution to the development of the agri-food sector.	<b>Egypt</b> To revise and remove the semi-colon to read, "...include ensuring ..."
iv. The legislation should state clear objectives including the role of risk analysis. <del>The objectives should include; ensuring the safety of food intended for human consumption, prevention and control of food-borne diseases, facilitation of food trade and contribution to the development of the agri-food sector</del> purpose it intends to achieve.	<b>ICBA</b>
iv. La législation devrait définir <del>des</del> <u>clairement le champ d'application de la loi et les objectifs</u> <del>clairs</del> <u>visés</u> , y compris le rôle de l'analyse des risques. Ces objectifs devraient comprendre: l'assurance de la sécurité sanitaire des aliments destinés à la consommation humaine, la prévention et le contrôle de maladies d'origine alimentaire, la facilitation du commerce des produits alimentaires et la contribution au développement du secteur agroalimentaire.	<b>Morocco</b>
Example: <i>The objectives of this Act are to provide for —</i>	
Example: <i>The objectives of this Act are to provide for —</i>	<b>ICBA</b>
Exemple: <u>Champs d'application : Les dispositions de la présente loi couvrent toutes les étapes de la production, la manipulation, le traitement, la transformation, l'emballage, le conditionnement, le transport, l'entreposage, la distribution, l'exposition à la vente et l'exportation des produits primaires, des produits alimentaires destinés à la consommation humaine et des aliments pour animaux. Sont exclus du champ d'application de la présente loi ..... (hors champs de la loi)</u> Objectifs <u>La présente loi couvre:</u>	<b>Morocco</b>
<i>a. management of safety of food of <u>plant and animal origin</u> including food-borne infections, contaminants, food-borne zoonoses and residues in food,</i>	<b>Nigeria</b> To be more inclusive of all food sources including those from plant origin
<i>a. management of safety of food of animal origin including food-borne infections, contaminants, food-borne zoonoses and residues in food,</i>	<b>Uganda</b> a) management of safety of food of plant and animal origin including food-borne infections, contaminants, food-borne zoonoses and residues in food,  Rationale: To be more inclusive of all food sources including those from plant origin
<del><i>a. management of safety of food of animal origin including food-borne infections, contaminants, food-borne zoonoses and residues in food,</i></del>	<b>ICBA</b>
<i>b. establishment and maintenance of facilities that process food,</i>	<b>Egypt</b> Is the objective of food control law to establish and maintain? or to establish and

Text	Comment by
	regulate? It is proposed to revise and keep “maintenance” and add “regulation” to read, “establishment, regulation and maintenance ...” Or to delete “maintenance” and replace it with “regulation”.
<del>b. establishment and maintenance of facilities that process food,</del>	<b>ICBA</b>
<p>b. la mise en place et l’entretien des installations de transformation des aliments;</p> <p><u>c) les exigences générales visant à ne permettre la mise sur le marché que des produits sûrs, notamment en établissant des règles générales d’hygiène, de salubrité, d’utilisation des produits de nettoyage et de désinfection, les seuils de contamination admissibles dans les aliments auxquels ils doivent répondre, y compris les normes rendues d’application obligatoire ;</u></p>	<b>Morocco</b>
b) la mise en place et l’entretien des installations de production, de transformation et de distribution des aliments;	
<del>e) sanitary standards of food processing establishments</del>	<b>ICBA</b>
<p><u>c) des normes sanitaires à respecter dans les établissements de production, de transformation et de distribution des aliments.</u> <del>les normes sanitaires à respecter dans les établissements de transformation des aliments.</del></p>	<b>Morocco</b>
<b>v. General Guiding principles</b>	
<del>General Guiding principles</del>	<b>ICBA</b>
<b>vi. Enabling Provisions</b>	
Depending on the country’s legal tradition, food safety legislation should define the nature and the limits of the powers to be exercised under it and designate the competent authorities in whom those powers are to be vested.	<b>Egypt</b> Reformulation of the end of the sentence is proposed to read, “... and to the interventions of the competent authorities required to ensure that the law and its regulations are being observed.”
Suivant la tradition juridique nationale, la législation relative à la sécurité sanitaire des aliments devrait définir la <del>nature</del> <u>nature</u> , l’étendu et les limites des pouvoirs dont elle permet l’exercice et désigner les autorités compétentes devant être investies de ces pouvoirs. <u>A titre d’exemple, les dispositions d’habilitation doivent spécifier les compétences des inspecteurs et l’étendu de leurs pouvoirs de recherche et de constatation des infractions à la législation.</u>	<b>Morocco</b>
Les pouvoirs qui incombent au gouvernement ou à l’autorité exécutive en vertu des dispositions d’habilitation devraient avoir trait à la formulation de règles concernant la mise en œuvre de la législation et l’intervention de l’autorité destinée à garantir que les lois et les règlements qui l’accompagnent sont observés. <u>Ces pouvoirs peuvent concernés, par ailleurs, le respect des libertés publiques, le secret professionnel, la formation continue des inspecteurs</u>	<b>Morocco</b>
<b>vii. Administrative Provisions</b>	
<del>Administrative Provisions</del>	<b>Uganda</b> The legislation should contain a category of provisions that set up administrative

Text	Comment by
	<p>structure(s) to carry out the activities necessary to enforce the law. For example, the law may establish single or multiple or integrated Food Safety Agency(ies); communication and coordination authority and/or any other appropriate agency.</p> <p>Rationale: To be consistent with texts in the FAO documents as placed as part of the references of the document ( FAO Book on Food Law Model <a href="http://www.fao.org/3/a0274e/a0274e.pdf">http://www.fao.org/3/a0274e/a0274e.pdf</a>)</p>
<p><i>Dispositions <del>administratives</del>organisationnelles</i></p> <p>La législation devrait contenir une catégorie de dispositions <del>établissant</del><u>désignant</u> une ou plusieurs structures administratives chargées de mener à bien les activités nécessaires à son <del>application</del><u>application</u> (<u>contrôle, inspection, investigations, audit...</u>). Par exemple, elle peut porter création d'une ou plusieurs agences de sécurité sanitaire des aliments, d'une autorité de communication et de coordination et/ou de tout autre organisme utile.</p>	<p><b>Morocco</b></p>
<p><i>viii. Substantive Provisions</i></p>	
<p><i>Substantive Provisions</i></p>	<p><b>South Africa</b></p> <p>It should be clear that the "Substantive provisions" should be linked to Codex texts and other relevant international documents.</p>
<p><i>Dispositions <u>techniques de fond</u></i></p> <p>The legislation should contain provisions relating to safety of food in the entire food chain. These include but are not limited to: food control requirements such as licensing, risk analysis, inspection, certification, monitoring and surveillance, hygiene requirements, prevention of fraudulent activities; food business operators' responsibilities, labelling, traceability and recall, import and export controls among others. The food safety legislation should make provision for a mechanism to facilitate performance of official controls e.g. fees, levies and charges for official control services rendered</p>	<p><b>Morocco</b></p> <p><b>Egypt</b></p> <p>1- To revise to read, "... to food..." deleting the unnecessary semi-colon.</p> <p>2- to add a comma after 'controls' to read, "... controls, e.g. fees, ..."</p> <p>3- A very important aspect is the networking of laboratories of excellence, at regional level with the aim of ensuring continuous monitoring of food safety, could play an important role in the prevention of potential health risks for consumers.</p>
<p>The legislation should contain provisions relating to safety of food in the entire food chain. These include but are not limited to: food control requirements such as licensing, risk analysis, inspection, <u>analysis</u>, certification, monitoring and surveillance, hygiene requirements, prevention of fraudulent activities; food business operators' responsibilities, labelling, traceability and recall, import and export controls among others. The food safety legislation should make provision for a mechanism to facilitate performance of official controls e.g. fees, levies and charges for official control services rendered</p>	<p><b>Mauritius</b></p>
<p>La législation devrait comporter des dispositions <u>générales et spécifiques</u> relatives à la sécurité sanitaire des aliments dans l'ensemble de la chaîne alimentaire, portant notamment sur: les exigences en matière de contrôle des aliments, comme l'octroi de <del>licences</del><u>licences /agréments/autorisations</u>, l'analyse des risques, l'inspection, la certification, le suivi et la surveillance, les exigence en matière d'<del>hygiène</del><u>hygiène</u> et de salubrité, <del>la</del> les procédures</p>	<p><b>Morocco</b></p>

Text	Comment by
<p>permanentes fondées sur les principes HACCP, les procédures de prévention des activités frauduleuses, les responsabilités des exploitants du secteur alimentaire, <del>l'étiquetage</del> les exigences d'étiquetage, la de traçabilité et les de rappels et le retrait des aliments et les exigences de contrôle des importations et des exportations, entre autres. La législation relative à la sécurité sanitaire des aliments devrait prévoir un mécanisme destiné à faciliter la réalisation des contrôles officiels, concernant par exemple les taxes et frais pour les services de contrôle officiel rendus.</p>	
<b>ix. Enforcement Provisions</b>	
<p><i>Enforcement Provisions</i></p>	<p><b>Mauritius</b> the guidelines seem to prone mostly punitive approaches. what about the use of Preventive approach? to ensure a graduated approach to enforcement? could also cater for HACCP.</p>
<p>La législation devrait comprendre des dispositions <u>préventives et coercitives visant à destinées à destinées à</u> assurer son respect et prévoyant <del>notamment entre autres,</del> des <u>actions telles que</u> : Mise en demeure, ordre de mesure correctives, ordre de rappel ou de retrait d'aliments... ; <u>Sanctions administratives tels que les ordres d'arrêt de production, les fermetures partielle ou totale des entreprises de la chaine alimentaire, saisies provisoires de documents ou d'aliments ; .... Sanctions pénales tels que : les amendes pécuniaires, les saisies pénales d'aliments ou de matériels ; les peines d'emprisonnement des contrevenants ; des mesures administratives, des sanctions, la saisie, l'inspection, des interdictions et des poursuites par les organismes chargés de son application.</u></p>	<p><b>Morocco</b></p>
<b>x. Offences and fines</b>	
<p><i>Offences and fines</i></p>	<p><b>Uganda</b> The legislation should make provisions for ensuring compliance. This should include administrative actions, sanctions, seizure, inspection, investigation, prohibition and prosecution among others by enforcement agencies.  Rationale: For emphasis</p>
<p><i>Infractions et amendes</i></p>	<p><b>Morocco</b></p>
<p>The legislation should provide and list the specific offences it covers, either by reference or in the articles providing for fines and penalties.</p>	<p><b>Egypt</b> Egypt confirms the importance of the inclusion of a specific chapter for sanctions taking into consideration that they should commensurate with violations committed by Food business Operators including different categories and types FBO's for example trans-porters and vendors.</p>
<p>La législation devrait indiquer <u>explicitement</u> les infractions qu'elle prévoit, soit en les énumérant, soit en les mentionnant dans les articles portant sur les amendes et les sanctions. <u>Les sanctions sont aussi énumérées explicitement.</u></p>	<p><b>Morocco</b></p>
<b>xi. Regulations</b>	

Text	Comment by
<p><i>Regulations</i></p>	<p><b>Egypt</b>            1- Egypt suggests to include legal provisions on Emergencies and crisis management            2- Egypt proposes to include mechanisms for regional notifications on policies and regulations and rapid alert system for rejections and violations in the course of imports and exports among the CFTA members.            3- Egypt proposes to have specific provisions for recognition of equivalence Agreements among CFTA countries.</p>
<p><b>xii. Miscellaneous provisions:</b></p>	
<p>The food safety legislation should make provisions for efficient implementation once the law comes into effect depending on the legal tradition of the CCAFRICA member country. Such provisions may include; <i>repeal, savings, transition, entry into force and consequential amendments.</i></p>	<p><b>Egypt</b>            1- t should be taken into consideration that food business operators should have sufficient time to adapt to the requirements which will be established and issued by the responsible Authorities            2- To revise to delete the semi-colon after “include” at beginning of the line and to add the missing space. Also, to remove the italics mode used at the end of the sentence.</p>
<p><b>REFERENCES</b></p>	
<p>REFERENCES<sup>6</sup></p>	<p><b>Mauritius</b>            this should be properly referenced</p>
<p>The references are included for the purpose of transparency during drafting but would be removed when the guidelines are finalised  <u>[7] Working Principles for Risk Analysis for Food Safety for Application by Governments (CXG 62-2007)</u></p>	<p><b>ICBA</b>            ICBA proposes adding footnote 7.</p>
<p>Patricia and Curtis, An Operational text book guide to food laws and operations</p>	<p><b>Egypt</b>            This Patricia A, Curtis citation was corrected by Egypt in the final draft of same document. Why was it not revised? The correct citation is: “Patricia A Curtis., Guide to Food Laws and Regulations. 2nd Edition, (Wiley pubs.) 2013.” It is inserted under reference 2. in violet font. There is no “Patricia &amp; Curtis”.</p>
<p>FAO/WHO Model food law <a href="http://www.fao.org/agn/food/pdf/foodlaw.pdf">www.fao.org/agn/food/pdf/foodlaw.pdf</a></p>	<p><b>Egypt</b>            This FAO/WHO reference had already been corrected by Egypt in the revision of the final version of the same document. It was replaced by a more recent FAO/WHO document, the reference for which was provided in the above-mentioned review of the final draft. It is given again hereunder: “FAO/WHO Guidelines for Developing a National Food Law, Annex 6. of Food and Nutrition Paper 76 entitled “Assuring Food safety and quality: Guidelines for Strengthening National Food Control Systems”, 2003.”</p>
<p>Codex Alimentarius Commission Procedural Manual – e.g, definitions, risk analysis principles, Statements of Principle</p>	<p><b>Egypt</b>            The citation of the CAC Procedural Manual</p>

Text	Comment by
Concerning the Role of Science in the Codex Decision-Making Process and the Extent to which other Factors are taken into Account, and Statements of Principle Relating to the Role of Food Safety Risk Assessment	does not need to be followed by a list identifying food safety related subject areas. The footnotes in the Guidelines give the CAC references to related texts. All that is required is to refer to the more recent version of the CAC Manual, citation to read: "Codex Alimentarius Commission - Procedural Manual. 27 ed. (2019) <a href="https://www.fao.org/publications/card/en/c/CA2329EN/">https://www.fao.org/publications/card/en/c/CA2329EN/</a>
Guidelines for the Exchange of Information between countries on rejections of imported foods (CXG 25-1997)	<b>South Africa</b> include 13 .. Guidelines for the Development of Equivalence Agreements Regarding Food Imports and Export Inspection and Certification Systems (CXG 34-1999)
Guidelines for the Exchange of Information between countries on rejections of imported foods (CXG 25-1997) <u>13. Guidelines [A1] [A2] for the Development of Equivalence Agreements Regarding Food Imports and Export Inspection and Certification Systems (CXG 34-1999)</u> <u>14. Guidelines on the Judgement of Equivalence of Sanitary Measures associated with Food Inspection and Certification Systems (CXG 53-2003)</u> <u>15. General Principles of Food Hygiene (CXC 1-1969)</u> <u>16. Working Principles for Risk Analysis for Food Safety for Application by Governments (CXG 62-2007)</u> <u>17. Food Control System Assessment Tool, FAO/WHO 2019</u> <u>18. Codex Alimentarius Commission Procedural Manual, FAO and WHO, 2019</u>	<b>ICBA</b> ICBA suggests added these 6 references since they refer to text in the document.