

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 6

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-Sixth Session

Comments of Morocco

General Comments:

Morocco thanks the United States of America and China, the EU, Iran, and the United Kingdom for Chairing and Co-Chairing this work and for their good spirit of consultation and good management of the work of the EWG set up for this purpose.

Morocco **supports the advancement of the preliminary draft guidelines on the prevention and control of food fraud in the Codex step-by-step process.** However, Morocco would like to make the following comments and looks forward to their consideration by the Committee:

Specific comments:

Title : Preliminary draft guidelines on the **prevention and control** of food fraud

Comment: Morocco highlights some confusion between the current title of the draft which aims the **prevention and control** food fraud, and the content of the draft using different terminologies which makes confusion in the understanding of food fraud and related terms. Indeed, in the body of the text we often find the terms : **detection, prevention, mitigation, and control of food fraud**. The sequence of his actions gives the impression that they follow each other in time. However, **prevention and mitigation** both aim to control food fraud. **Mitigation** assumes food fraud events will frequently occur and focus on trying to mitigate or reduce the negative consequence (Spink *et al.*, 2017; 2019a). **Prevention** assumes that the root cause of the event could be eliminated or at least significantly reduced in the likelihood of occurrence (Spink *et al.*, 2017; 2019a). Thus, food fraud prevention aims at mitigating food fraud before it occurs (Moyer, DeVries, & Spink, 2017). Achieving food fraud prevention and mitigation depends on detecting, reducing, or eliminating **vulnerability**.

In conclusion, Morocco hopes for pedagogical clarity in the terminology adopted in this draft, which will certainly help to avoid ambiguous comprehension and effectively fulfill the current lack of specific guidance in the food fraud domain.

Accordingly, Morocco proposes to adopt de following definitions:

Preventive measure: any activity that can be carried out to prevent or eliminate a hazard for food fraud and food authenticity or to reduce it to an acceptable level.

Control measure: any activity aiming to conduct a planned sequence of observations or measurements in order to obtain an overview of the degree of compliance with the food fraud legislation on food, and feedstuffs.

Mitigation measure: Measure taken to decrease vulnerability to a certain type of adulteration in a given supply chain.

Section 2 – Scope/Objective

Comment by Morocco:

- Retain footnote 3 which excludes from the scope of the guidelines intellectual property rights issues that are actually outside the remit of Codex.
- Keep the Parag. 9 *bis* and 9 *bis bis* (in the body of the text) as they are important to clearly frame the scope of the directives without interfering with the national laws of countries.

Section 6 - Roles and Responsibilities - 13. The role and responsibility of FBOs shall, as appropriate, include:

Comment:

- Morocco proposes the following addition to the Parag. 13 (a): "a. To understand their supply chain and the products/ingredients/packaging that may be subject to food fraud and to *ensure the integrity of food products and to require its suppliers to have a secure supply chain.*"
- Morocco proposes to keep item "b"
Rationale: FBOs are an essential link in the detection, prevention, mitigation and control of food fraud and therefore must ensure the integrity of food products and require its suppliers to have a secure supply chain.

Section 7: Relevant activities of competent authorities

Comment:

- Morocco proposes the following addition to the Parag. 17: "Policies, procedures and regulatory requirements for the prevention and control of food fraud must be transparent and *risk-based and involve the development of risk profiles and vulnerability assessments for each food supply chain and commodity.*"
Rationale: For better control of food fraud, the competent authorities are required to develop risk profiles and assess vulnerability for each supply chain and each food product at national level. This reference in the Codex guidelines will allow members to undertake this type of prevention activity.