

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 10 (b)

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

35th Session, FAO Headquarters,

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STRATEGIC PLANNING OF THE CODEX ALIMENTARIUS COMMISSION

DRAFT CODEX STRATEGIC PLAN 2014-2019

Comments of Argentina, Costa Rica, Japan, Malaysia, Papua New Guinea and United States of America

ARGENTINA

Espanol

• *Comentario General:*

Entendemos que se debería felicitar a Estados Unidos por el trabajo que ha realizado procurando ordenar las contribuciones e ideas que los Miembros del Comité Ejecutivo brindaron en la pasada reunión en relación con el Plan Estratégico en discusión.

• *Comentarios específicos:*

• *Objetivo 1.1. Actividad 1.1.4.* Debería decir:

1.1.4. Promoción del uso de las normas del Codex en el comercio internacional y como base para la consistencia de las reglamentaciones nacionales con las normas del Codex.

• Objetivo 1.2.

Actividad 1.2.2 La evaluación de los mecanismos y procedimientos de establecimiento de normas para asegurarse de que tienen en cuenta los avances científicos y tecnológicos más recientes.

No queda clara la intención del párrafo, puesto que el Codex tiene en cuenta los avances tecnológicos y científicos en su accionar. Sin embargo, cuando se pretenden modificar los mecanismos y procedimientos para el establecimiento de normas es posible que se pretenda introducir un criterio de mejora continua en la adopción de normas, lo cual supone revisar de manera permanente las normas para adecuarlas a los nuevos desarrollos o nuevos productos presentes en los mercados, muchas veces asociados con patentes.

Argentina no está de acuerdo con esta forma de trabajo, teniendo en cuenta que Codex representa el esfuerzo de más de 180 países en el mundo. Atento a ello, creemos que Codex debe concentrarse en garantizar la inocuidad sin importar si se trata de productos nuevos o muy conocidos, teniendo en cuenta la información técnica y científica disponible, no para eliminar sustancias, compuestos, que continúan siendo seguras e inoocuos, sino para incluir las nuevas.

Actividad 1.2.3: Creemos que debería incluirse el “efecto” del cambio climático como factor de riesgo de inocuidad. Atento a ello, sugerimos incluir la palabra efecto en este texto.

En cuanto a las preocupaciones de los consumidores, se deberían atender en tanto reúnan las condiciones establecidas en la “Declaraciones de Principios relativos a la función que desempeña la ciencia en el proceso decisorio del Codex y la medida en que se tienen en cuenta otros factores”.

Objetivo 2.1. y sus Actividades

Sería preciso clarificar a que grupos de expertos FAO se refiere que no son grupos de expertos FAO/OMS, que son los que proveen asesoramiento científico a Codex.

Por otra parte, quisiéramos mayor precisión respecto del punto 2.1.2 en cuanto a la utilización sustantiva de los conocimientos científicos y técnicos de los Estados Miembros y sus representantes en la elaboración de las normas del Codex. Podrían aclarar debidamente que se pretende con esto? Se establecería una jerarquía de participación, se categorizaría por conocimientos a los Estados Miembros o a sus representantes? Ante la duda, no estamos cómodos con esta inclusión.

Objetivo 2.2.

Nos preocupa que se incluya en el Plan el examen de formas de financiamiento para los Grupos de Expertos FAO/OMS.

Objetivo 4.1.

4.1.2. nos preocupa como se pretenden flexibilizar los procedimientos de adopción de normas.

4.1.4. Creemos que es fundamental que quede establecido que los documentos del Codex se encontrarán disponibles por lo menos 2 meses antes de la realización de las reuniones, pues caso contrario los más perjudicados son los países en desarrollo que cuentan con recursos muy limitados para responder a las demandas del Codex. Entonces creemos que hay cuestiones que se deben garantizar.

English

- ***General comments:***

We believe that the United States should be congratulated on the work conducted, aiming at ordering the contributions and ideas that the Members of the Executive Committee provided in the last session in relation to the Strategic Plan under discussion.

- ***Specific comments:***

- ***Objective 1.1. Activity 1.1.4.*** It should read:

1.1.4. Promotion of the use of Codex standards in the international trade and ~~the basis~~ **the consistency of domestic regulations with Codex standards.**

- **Objective 1.2.**

Activity 1.2.2 The evaluation of the mechanisms and procedures for the establishment of standards, to ensure that they take into consideration the latest scientific and technological advances.

The intention of this paragraph is not clear, since Codex considers the technological and scientific advances in its proceedings. However, when there is an intention to modify the mechanisms and procedures for the establishment of standards, it is possible that a criterion of continuous improvement in the adoption of standards may be also introduced, which supposes the continuing revision of the standards to adapt them to the new developments or new products present in the markets, often associated with patents.

Argentina disagrees with this form of work, considering that Codex represents the effort of more than 180 countries in the world. In view of this, we believe that Codex should focus on guaranteeing the safety of products, no matter if they are new or well-known, taking into consideration the technical and scientific information available; not to eliminate substances or compounds which continue being safe and secure, but to include new ones.

Activity 1.2.3: We believe that the “effect” of the climate change should be included as a factor that affects food safety. For this reason, we suggest to include the word “effect” in this wording.

As regards consumers concerns, they should be addressed as long as they meet the conditions established in "The first Statement of Principle Concerning the Role of Science in the Codex Decision-Making Process and the Extent to Which Other Factors are Taken into Account".

Objective 2.1. and its activities

It is necessary to clarify which FAO expert body it makes reference to, since it is other than the FAO/WHO expert bodies that provide scientific advise to Codex.

Besides, we would like further clarification of point 2.1.2, in relation to the substantive use of the scientific and technical expertise of member countries and their representatives in the elaboration of Codex standards. Could you please clarify the purpose of this? Would it serve to the establishment of a participation hierarchy? Would the member countries or their representatives be classified according to their expertise? Since this raises doubts, we don't feel comfortable with its inclusion.

Objective 2.2.

Argentina is concerned about the inclusion of the exploration of forms of funding for the FAO/WHO expert bodies in the Plan.

Objective 4.1.

4.1.2. We are concerned about how the procedures for the adoption of standards would be made more flexible.

4.1.4. We believe it fundamental to establish that Codex documents should be made available at least 2 months before the sessions, since not doing so affects primarily developing countries, which have limited resources to respond to Codex demands. We believe that there are certain issues that should be ensured.

COSTA RICA

Costa Rica agradece la oportunidad de emitir los siguientes comentarios con relación al Plan Estratégico del Codex para 2014-2019:

Introducción

Estamos de acuerdo con la incorporación del texto que estaba entre corchetes.

Declaración de visión estratégica

Eliminar de la versión al español las palabras “y trabajar” para que sea consistente con la redacción de la versión en inglés y no le cambie el sentido.

Valores fundamentales del Codex

Eliminar “sin, por ello, limitarse a los mismos”. En esta sección se están enunciando los valores fundamentales del Codex y no debe quedar abierto. Además no entendemos por qué esto se está modificando pues en la 66ª reunión del CCEXE se acordó que solamente se iban a modificar las actividades.

Actividad 1.1.3.

Se propone modificar la redacción de manera que se invierta el sentido y se entienda que los marcos regulatorios de los países deben basarse en las normas del Codex tal y como lo establecen los acuerdos de OTC y MSF. Pues con la redacción actual está a la inversa dando a entender que las normas del Codex deben basarse en los marcos regulatorios de los países perteneciendo a la esfera de los gobiernos y que no tiene relación directa con el objetivo acordado.

Es oportuno mencionar que en el Plan Estratégico del Codex 2008-2013, se brinda el mismo enfoque que tratamos de defender en esta oportunidad y cita en el párrafo 7:

“7. En muchos países, el control efectivo de los alimentos se ve dificultado por la existencia de una legislación fragmentada, jurisdicciones múltiples y deficiencias en la vigilancia, la supervisión y la aplicación reglamentaria. La adopción de sistemas racionales de control y reglamentación de los alimentos a nivel nacional es esencial para garantizar la salud y la seguridad de la población del país y asegurar la inocuidad y calidad de los alimentos que son objeto de comercio internacional. La FAO y la OMS han logrado avances importantes en la promoción de marcos reglamentarios racionales a nivel nacional. A la vez que alienta a los miembros a utilizar las normas del Codex pertinentes, la Comisión exhorta con firmeza a la FAO y la OMS a fomentar sistemas nacionales de reglamentación que se basen en principios y directrices internacionales y abarquen todos los componentes de la cadena alimentaria...”

Actividad 1.2.2.

Se solicita la revisión de esta actividad y Costa Rica sugiere agregar al final “tomando en consideración las necesidades de los países en desarrollo”.

Es importante añadir la frase citada anteriormente porque se debe fomentar el avance tecnológico y científico en el Codex pero sin dejar de lado la situación y necesidades de los países en desarrollo. En la última viñeta del Plan Estratégico del Codex 2008-2013 del párrafo 6 se reafirma:

- *“Al elaborar normas y textos afines del Codex y tomar decisiones al respecto, la CAC debe tomar en cuenta las consecuencias técnicas y económicas para todos los miembros, así como las necesidades especiales de los países en desarrollo por lo que respecta a la infraestructura, los recursos y la capacidad técnica y jurídica. Las normas y textos afines del Codex no deben tener por efecto la creación de obstáculos innecesarios, injustificados o discriminatorios a las exportaciones de los países en desarrollo.”*

Actividad 1.2.3.

Costa Rica sugiere eliminar los ejemplos del Plan Estratégico y redactar las actividades de manera objetiva sugiriendo la actividad de la siguiente forma:

1.2.3. Elaboración y revisión de las normas internacionales y regionales que se requieran para satisfacer las necesidades determinadas por los miembros y responder ante factores que afecten a la inocuidad de los alimentos y las prácticas equitativas en el comercio de alimentos.

Actividad 1.3.1.

No estamos de acuerdo con la redacción propuesta de 1.3.1. pues esta actividad debe señalar sobre coordinación y cooperación y no mencionar aspectos de la granja a la mesa ni preocupaciones de consumidores. Por lo anterior, se considera mejor redacción la que estaba anteriormente:

“Establecimiento de un mecanismo para la comunicación periódica con la Organización Mundial de Sanidad Animal (OIE) y la Convención Internacional de Protección Fitosanitaria (CIPV) a fin de facilitar la colaboración sobre normas que afecten al Codex y a dichas organizaciones.”

Asimismo, se debe tomar en consideración lo discutido en el CCGP en donde se establece dentro del mandato a los grupos de trabajo establecidos, “70. ...la colaboración en el desarrollo de normas de interés mutuo, respetando los mandatos y procedimientos del Codex Alimentarius y la OIE, e incluyendo un compromiso con un proceso abierto, transparente e inclusivo, el grupo de trabajo propondrá orientación destinada a mejorar los mecanismos para tener en cuenta los trabajos pertinentes que hayan sido realizados o estén en curso de realización por cada una de las organizaciones, e identificará medios para remitir de forma coherente a las normas y directrices de la otra organización, según proceda”.

Actividad 1.3.2.

Estamos de acuerdo.

Propuesta de nueva actividad en la meta estratégica 2

Proponemos incluir una nueva actividad:

- *Implementar en forma permanente cursos virtuales sobre temas relacionados con información científica y los principios de análisis de riesgo.*

Actividad 2.3.3.

Se solicita aclarar la eliminación de la siguiente viñeta, Costa Rica apoya su reincorporación:

- *Exploración de enfoques, por parte de la FAO y la OMS, con el fin de mejorar la participación de científicos de los países en desarrollo así como el uso de datos procedentes de dichos países.*

Asimismo se solicita incorporar las siguientes actividades:

- *Conformar redes de trabajo de los países miembros interesados para que juntos generen y presenten datos que puedan ser la base para realizar estudios en los comités de expertos.*

La justificación de esta nueva actividad radica en que los países en desarrollo con frecuencia no pueden aportar todos los estudios prerequisites ante los Comités de Expertos (JECFA, JMPR, etc) porque carecen de datos y creemos factible que mediante la organización de la información de varios países se pueda presentar.

- *Crear una base de datos de expertos del Codex.*

Actividad 3.1.2.

Costa Rica está de acuerdo con la nueva redacción que incluye la frase “miembros del Codex interesados”.

Se propone agregar una actividad:

- *Implementar un mecanismo oficial de reuniones virtuales (a través de videoconferencias), en algunos de los comités del Codex, a manera de Plan Piloto, a fin de favorecer las participaciones de los países que no cuentan con recursos para asistir.*

Actividad 3.3.1.

Estamos de acuerdo con la nueva redacción de la actividad 3.3.1.

Sin embargo, sugerimos que se reincorpore sin el ejemplo, la segunda que se encontraba anteriormente, la cual es la siguiente:

- *Cooperar con las iniciativas regionales de inocuidad de los alimentos para el fortalecimiento de capacidades para apoyar la recopilación de datos útiles para la elaboración de normas Codex.*

Actividad 4.1.1.

Agregar lo siguiente:

4.1.1 Examen de los procesos de establecimiento de normas del Codex y aplicación de mejoras a fin de asegurar un funcionamiento eficaz y eficiente, así como la aprobación **transparente, abierta y oportuna** de las normas **hasta donde el ámbito del Codex lo permita**.

Actividad 4.1.2.

No se entiende su redacción, se solicita su revisión bajo la luz de lo acordado en el CCGP.

Actividad 4.1.4.

Se apoya su redacción.

Actividad 4.1.5.

Costa Rica no está de acuerdo con el aumento de las reuniones los grupos de trabajo físico, solicitamos que se propicie el uso de nuevas tecnologías y que se minimicen las reuniones de grupos de trabajo presenciales.

Costa Rica solicita vehementemente que se incluya una nueva actividad que establezca:

- *Implementar iniciativas que mejoren la distribución oportuna de los documentos del Codex en los idiomas oficiales.*

JAPAN

Japan is pleased to submit the following comments on the Draft Codex Strategic Plan 2014-2019.

Specific Comments

Objective 1.1: Establish new and review existing food **Codex** standards, based on priorities of the CAC.

Rationale: consistency in usage of terms

Activities:

1.1.3 ~~Incorporate~~ **Ensure that** the concepts of public health, sound regulatory frameworks, and fair trade practices are incorporated into Codex standards development.

Rationale: protection of consumer health, sound regulatory frameworks, and fair trade practices are the purpose of Codex.

Objective 1.2: Proactively identify emerging issues and member country needs ~~and, where appropriate, develop relevant food standards.~~

Rationale: Objective 1.2 could focus on initiatives to identify emerging issues and member country needs by deleting the text which is duplication of Objective 1.1.

Activities:

1.2.1 Develop a process for the early identification of the need for new standards, ~~guidelines, and recommendations~~, particularly with respect to emerging food safety risks and new technologies.

Rationale: the term "standards" is used to cover standards and all related texts in this document (see footnote in page 2)

1.2.3 ~~Develop and revise international and regional standards as needed in response to~~ **Identify emerging issues and** needs ~~identified by~~ **of** Members **related** ~~and in response to~~ factors that affect food safety and fair practices in the foods trade; for example, emerging risks, food security, shifting population patterns, climate change, and consumers concerns.

Rationale: to place focus on initiatives to identify emerging issues and member country needs

Objective 1.3:

Activities:

1.3.2 Promote collaboration in standards development **in Codex** with the OIE and IPPC on standards that affect Codex and those organizations.

- 1.3.3 Promote cooperative ~~programs~~ **mechanism** with non-governmental standards-setting organizations to identify needs for new Codex standards and to promote the use of existing Codex standards.

Rationale: to clarify the meaning of the activity

Objective 2.2:

Activities:

- 2.2.3 Explore all **potential** funding **sources** for FAO/WHO expert bodies, recognizing the imperative to respect FAO/WHO research priorities in addition to the core funding provided by FAO and WHO.

Rationale: "all funding" is not clear.

Objective 3.1:

Activities:

- 3.1.2 Plan, with the involvement of interested Codex Members, the next steps for the Codex Trust Fund, which is due to end in 2015, ~~or a successor initiative, to mitigate resource constraints for full Codex participation by Members.~~

Rationale: It is appropriate to delete as we have not yet decided to develop a successor initiative.

- 3.1.3 ~~Develop a formal mentorship initiative, building on lessons learned from existing informal programs.~~

Rationale: This activity is duplication with Activity 3.2.2

Objective 3.2:

Activities:

- 3.2.3 Encourage ~~the use of mentoring and~~ cooperative programs.

Rationale: We think that mentoring is included in cooperative programs.

MALAYSIA

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Objective 1.2: Proactively identify emerging issues and member country needs and, where appropriate, develop relevant food standards.		
1.2.3	Develop and revise international and regional standards as needed in response to needs identified by Members and in response to factors that affect food safety and fair practices in the foods trade; for example, emerging risks, food security, shifting population patterns, climate change, and consumers concerns.	<p>Develop and revise international and regional standards as needed in response to needs identified by Members and in response to factors that affect food safety and fair practices in the foods trade; for example, emerging risks <u>and</u> food security. shifting population patterns, climate change, and consumers concerns.</p> <p><i>Malaysia has some concerns with regard to inclusion of social issues such as shifting population patterns and climate change into the work of Codex.</i></p> <p><i>It is in our view that in its standard setting, Codex should only focus on issues that are directly related to its mandate and objectives that are protecting the health of consumers and ensuring fair trade practices. Therefore, we propose deleting those last two items.</i></p>
Objective 1.3: Strengthen coordination and cooperation with other international standards-setting organizations seeking to avoid duplication of efforts and optimize opportunities.		<p>Objective 1.3: Strengthen coordination and cooperation with other international <u>intergovernmental</u> standards-setting organizations seeking to avoid duplication of efforts and <u>optimize opportunities.</u></p> <p><i>Malaysia acknowledges the fact that currently issues of food safety involves various organizations and thus, the need for closer collaboration with these organizations to increase efficiency on issues of common interest. However, we are of the opinion that coordination and cooperation should be</i></p>

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		<p><i>only with international <u>intergovernmental</u> standards-setting organizations so as to ensure impartiality.</i></p> <p><i>Furthermore, the mission, priorities and procedures with regard to inclusiveness and transparency of other international standard-setting organizations are different from Codex.</i></p> <p><i>Malaysia also considers that the term of reference of each organization is clear and that there is no duplication of work. Hence, we propose deleting the final part of the sentence with regard to this matter.</i></p>
1.3.1	Seek to enhance a culture of standards development with the World Organization for Animal Health (OIE) and the International Plant Protection Convention (IPPC) that ensures all potential food safety risks and other consumer concerns are addressed from farm to fork, utilizing consistent methodologies and approaches in their development.	<p>Seek to enhance a culture of standards development with the World Organization for</p> <p>Animal Health (OIE) and the International Plant Protection Convention (IPPC) that ensures all potential food safety risks and other consumer concerns are addressed from farm to fork, utilizing consistent methodologies and approaches in their development.</p> <p><i>We are not entirely clear on the intent and meaning of Activity 1.3.1. If it is to emphasize on developing standards of common interest with the OIE and IPPC, we feel that Activity 1.3.2 is suffice and provides a clearer mode of action. It would be good to ensure that activities laid down in the Strategic Plan are concise to avoid difficulties in assigning measurable indicators for tracking the progress of the activities.</i></p>
1.3.3	Promote cooperative programs with non-governmental standards-setting organizations to identify needs for new Codex standards and to promote the use of existing Codex standards.	<p>Promote <u>Strengthen</u> cooperative programs with non-governmental <u>other international intergovernmental</u> standards-setting organizations to identify needs for new Codex standards and to promote the use of existing Codex standards.</p> <p><i>Please refer to our comments under Objective 1.3 above.</i></p>
Strategic Goal 2: Ensure the application of risk analysis principles in the development of Codex standards.		
2.2.3	Explore all funding for FAO/WHO expert bodies, recognizing the imperative to respect FAO/WHO research priorities in addition to the core funding provided by FAO and WHO.	<p><i>Malaysia is strongly of the opinion that if funding is sourced from private sectors, it must be from a pooled fund (not from single company). Codex should only receive this fund without any reference to any particular company. This should be the policy and mechanism when receiving such fund. Similarly, this fund should be managed impartially and professionally by FAO/WHO to support various research projects and expert assistances.</i></p> <p><i>In order to ensure integrity and impartiality, research projects should not be sponsored exclusively by a single company. Additionally, the fund should be managed transparently and based on research priorities.</i></p> <p><i>Companies should also be made clear on the fact that their financial sources can be used for any type of project deemed necessary by FAO/WHO regardless of its relevance to the interest or nature of the companies.</i></p>

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Strategic Goal 3: Facilitate the effective participation of all Codex Members.		
Objective 3.1: Increase the effective participation of developing countries in Codex.		
		<p><i>Malaysia proposes inserting a new Activity 3.1.4 as follows (i.e. point transferred from activity 3.2.5):</i></p> <p>3.1.4 <u>Expand co-hosting of Committee meetings and work groups to enhance skills of developing country members.</u></p>
Objective 3.2: Promote capacity building programs that assist countries in creating sustainable national Codex structures.		<p>Objective 3.2:</p> <p>Promote <u>FAO and WHO to continue to undertake</u> capacity building programs that assist countries in creating sustainable national Codex structures.</p> <p><i>Malaysia is of the view that programs of capacity building should not be reflected in the Codex Strategic Plan given that 'capacity building' is not in the terms of reference of Codex. It should be recognized that 'capacity building' is a continuous activity under the parent body i.e. FAO/WHO.</i></p> <p><i>Therefore, we propose the above amendments.</i></p>
3.2.1	Encourage support for Codex activities by FAO and WHO and member governments through the creation of sustainable national Codex-related structures.	<p>Encourage support for Codex activities by FAO and WHO and member governments through the creation and sustainability of national Codex-related structures. <u>FAO and WHO continue to increase capacity building program in developing countries in the creation of national Codex-related structures.</u></p> <p><i>Malaysia proposes the above amendments in line with our comments under Objective 3.2 above.</i></p>
3.2.2	Promote capacity building programs that assist developing countries in prioritizing their participation in Codex committees and task forces.	<p>Promote <u>FAO and WHO to continue strengthen their</u> capacity building programs that assist developing countries in prioritizing their participation in Codex committees and task forces.</p> <p><i>Malaysia feels that what is more important is for FAO and WHO to assist developing countries in participating in Codex meetings rather than 'in prioritizing their participation'. It is only by physically participating in Codex meetings can members from developing countries gain the necessary knowledge and experience in Codex matters, so as to be able to plan and develop national Codex structures.</i></p> <p><i>In our view, assisting developing countries in prioritizing their participation in Codex may not be of much use as 'prioritizing' merely arranges their participation in order of importance and does not mean that they will or can attend the meeting.</i></p> <p><i>Therefore, we propose amending Activity 3.2.2 as shown above.</i></p>
3.2.3	Encourage the use of mentoring and cooperative programs.	<p>Encourage the use of mentoring and cooperative programs.</p> <p><i>Malaysia proposes deleting Activity 3.2.3 as this point is already covered under Activity 3.1.3.</i></p>
3.2.4	Promote the use of FAO/WHO Regional Coordinating Committees as a forum to host educational and	<p>Promote <u>Encourage</u> the use of FAO/WHO Regional Coordinating Committees as a forum to host educational and technical capacity building activities.</p>

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	technical capacity building activities.	<i>Malaysia proposes the above amendments in line with our comments under Objective 3.2 above.</i>
3.2.5	Expand co-hosting of Committee meetings and Work Groups to enhance skills of developing country Members.	Expand co-hosting of Committee meetings and Work Groups to enhance skills of developing country Members. <i>Malaysia proposes transferring this point to Objective 3.1. (please refer to our comments under new Activity 3.1.4, proposed above).</i>
Objective 3.3: Assist in addressing the needs of developing countries by leveraging the work of existing international food safety and food related economic development programs.		Objective 3.3: Assist in addressing the needs of developing countries by leveraging the work of existing international food safety and food related economic development programs. <i>Malaysia proposes deleting the entire Objective 3.3, with specific comments under the following Activities:</i>
3.3.1	Establish strategic partnerships with organizations with relevant economic development programs to identify opportunities to support the respective mandates of each.	Establish strategic partnerships with organizations with relevant economic development programs to identify opportunities to support the respective mandates of each. <i>It is imperative that Codex maintains its existence as an independent standard-setting body. Codex should also be mindful of the differences in the mission, priorities and procedures with regard to inclusiveness and transparency of the various international development organizations from that of Codex.</i>
Strategic Goal 4: Implement effective and efficient work management systems and practices.		<i>Malaysia has specific comments on some of the following objectives and activities under Strategic Goal 4.</i>
Objective 4.1: Ensure an effective, efficient, transparent, and flexible standard setting process for the timely adoption of standards.		Objective 4.1: Ensure an effective, efficient, <u>and</u> transparent, and flexible standard setting process for the timely adoption of standards. <i>Codex has developed a well structured 8-Step Procedure which allows for adequate flexibility in the setting of standards through the 5/8 accelerated elaboration procedure as well as the possibility of adopting standards at Step 5, with the omission of Steps 6 and 7.</i> <i>Through the accelerated elaboration procedure, a draft standard can be discussed and finalised within one session of a subsidiary body of the Commission and forwarded for adoption by the earliest Commission. This timeframe is regarded appropriate and should not be further shortened, considering that sufficient time should be allowed for countries to deliberate and have consultations at the national level.</i> <i>In view of the fact that there is already sufficient 'flexibility' in the current procedure for the elaboration of standards, we therefore propose deleting the word 'flexible' in Objective 4.1.</i>
4.1.2	Explore development of flexible processes to address roadblocks in Codex standards-setting procedures.	Explore development of flexible processes to address roadblocks in Codex standards-setting procedures. <i>We propose deleting Activity 4.1.2 in line with our comments under Objective 4.1 above.</i>

Draft CX/CAC 12/35/12		Malaysia's Comments
4.1.3	Assess benefits and, where cost effective, implement new information technologies to improve member participation in committees and work groups, Codex communication, work flow, and management of activities.	<p>Assess benefits and, where cost effective, implement new information technologies to improve member participation in committees and work groups, Codex communication, work flow, and management of activities.</p> <p><i>Malaysia regards that much has been achieved since the initiation of the current Codex Strategic Plan (2008-2013) to improve member participation and the overall workings of Codex.</i></p> <p><i>We do not see the need to conduct a cost-benefit analysis as Codex may need to engage external consultants in view of the technicalities of the work. This will of course incur cost.</i></p>
Objective 4.2: Enhance capacity to arrive at consensus in standards setting.		<p>Objective 4.2: Enhance capacity to arrive at consensus in standards setting.</p> <p>Malaysia proposes deleting the entire Objective 4.2.</p> <p><i>We do not see the need to have Objective 4.2 in this Strategic Plan as there are already guidelines in the Procedural Manual to facilitate consensus.</i></p>
4.2.1	Improve the knowledge and skills of Codex delegates to ensure that the standards setting process operates effectively and efficiently and is well managed.	<p>Improve the knowledge and skills of Codex delegates to ensure that the standards setting process operates effectively and efficiently and is well managed.</p> <p><i>We are of the opinion that this point is already covered under Activity 3.1.3.</i></p>
4.2.2	Improve the skills of Committee and Working Group Chairs.	<p>Improve the skills of Committee and Working Group Chairs.</p> <p><i>We do not see the need to have Objective 4.2 in this Strategic Plan as there are already guidelines for chairpersons in the Procedural Manual.</i></p>

PAPUA NEW GUINEA

- Under Codex Core Values, I suggest you include "excellence and relevance" to be consistent with the Vision and Mission statements.
- Under Strategic Goal 3, Objective 3.1: I suggest you add a new activity - 3.1.4 as follows: "Assist and support member countries develop innovative institutional arrangements to ensure effective participation."
- Under Strategic Goal 3, Objective 3.3: I suggest you add a new activity - 2.3.2 as follows: "Encourage and support member countries to develop simpler and robust methods for use in the field."

UNITED STATES OF AMERICA

The Strategic Plan identifies the Joint FAO/WHO Expert Meetings on Nutrition (JEMNU) in addition to other FAO/WHO expert bodies, and the United States proposes to add other references to nutrition, which are included in the following comments:

[New text in bold]

Paragraph 2 of the Introduction:

For food safety **and nutrition** matters, the Commission establishes its standards using the principles of risk analysis and bases its work on the scientific advice provided by the FAO and WHO expert committees.

- 1.2.1 Develop a process for the early identification of the need for new standards, guidelines, and recommendations, particularly with respect to emerging food safety **and nutrition** risks and new technologies.
- 1.3.2 Promote collaboration in standards development with the OIE and IPPC on standards that affect **both** Codex and those organizations.

Rationale: clarity.

1.3.3 Promote cooperative programs with non-governmental standards-setting organizations to identify needs for new standards, **to assure standards are complementary and not duplicative**, and to promote the use of existing Codex standards.

Rationale: clarify the desired relationship between Codex standards and standards of these other organizations.

2.1.1 Use the scientific advice of FAO/WHO independent expert bodies to the fullest extent possible in food safety **and nutrition** standards development based on the *Working Principles of Risk Analysis for Application in the Framework of the Codex Alimentarius*.

2.3.1 Encourage scientific food safety **and nutrition** data development capabilities in developing countries.

2.3.1(bis) Encourage countries to collect data relevant to their countries and to respond to calls for data from FAO/WHO expert bodies.

Rationale: operationalizes 2.3.1.

4.1.4 Ensure timely distribution of **Committee documents** and compiled country comments to Members.

Rationale: Timely distribution of Committee documents is equally important.