
*This note is intended to prepare delegates registered for the CCFICS
Intersessional Working Group Meeting on Establishment listing guidance in
Oslo 17 – 18 March 2026.*

Firstly, we would like to warmly welcome you to Oslo, and we are looking forward to almost two days of working together to achieve progress on the annex to CXG 89-2016 on the *Principles and Guidelines to harmonize the Use, Design, Implementation and Update of Establishment Lists*.

Secondly, we would like to inform you about the work being done so far: The Electronic Working Group (EWG) on *Establishment Listing* was set up by CCFICS27 in 2024 and started its work in January 2025. 34 members and 4 observer organisations are participating in this EWG and there have already been two rounds of comments. The PWG is now presented with the third draft, which will form the basis for these two days.

Thirdly, we would like to give you some information about discussions and clarifications made during the EWG work over the last year, and we hope that you will consider this when preparing for the discussions:

We have some initial and basic assumptions:

- The reader of the Annex is familiar with the body of the document CXG 89-2016.
- Members of Codex are familiar with and are already using existing CCFICS documents relevant to their exchange of information in trade situations (audits, assessments, import testing, questionnaires, certificates etc), as these texts already provide very helpful guidance in trade situations.

We have agreed on the following approach:

- References to relevant chapters where the body of the document is particularly relevant are made, otherwise such references are not included.
- Avoid repeating text (guidance) already included in the body of the document, unless deemed necessary for the understanding of the text.
- On terminology:
 - When referring to the scope of the annex:” the *use, design, implementation and update*” of establishment lists is used.
 - When referring to different concepts of “food”, “commodities” or “traded commodity” etc, “*specific food products or groups of products*” is used in line with CXG 89-2016 paragraph 4.1.
 - For the use of “establishment lists” and “establishment listing”, establishment list(s) is used as the noun and establishment listing as the verb.
 - There have been different comments on terminology related to terms reflecting the science-based decision-making principles: “based on evidence of risk”, “risk-based justification”, “risk based” and “on the basis of risk” depending on the context. In this draft, the terminology related to risk is put in square brackets, and it is proposed to postpone this discussion until the terminology in the Traceability document is agreed, to see if we can use the same approach.
- On some of the sections:
 - **The preamble** (section 1) has been thoroughly discussed through the two rounds of comments. It now clarifies what establishment lists are and can be used for. It also provides more clarity on the intent of this draft and that it is to be read in accordance with CXG 89-2016. Language is also included in order not to give undue weight to the role of establishment lists, nor to promote its use. Other elements and further details of the guidance are provided elsewhere in the annex.
 - **Purpose, objective and scope** (section 2 and 3) have also been thoroughly discussed through the two rounds of comments, and the third draft includes one section on purpose and objective, and another on scope. Comparing the text in the purpose and scope section, we would like to underline that the purpose is much about the intent and function of the annex, and the scope is about what is covered by the annex (boundaries). We hope this can work also for members of the PWG.
 - The section on **Roles and responsibilities** (section 4) has been completely rewritten for this third draft, defining some very general responsibilities shared by the importing and exporting competent

authorities. This is done to provide a framework in which the more detailed roles and responsibilities defined in the rest of the annex would fit, and at the same time avoid several repetitions.

In addition, a new paragraph is suggested on FBOs, highlighting their responsibility to provide accurate, complete and validated information relevant to establishment listing.

- The intention of the section on **Principles** (section 6) is to focus on principles especially related to establishment lists and not repeat principles already included in the main document CXG 89-2016. However, at the same time the principles in the main document do not include the necessary level of detail for establishment listings. This justifies the importance of outlining these clearly in this annex. Some principles also relate to the exchange of information between trading partners which to a certain extent is covered by several CCFICS texts. However, for readability, the most relevant principles are included as most members of the EWG argued that they relate to the decision-making process on whether an establishment list is required. Including them in the annex promotes coherence and consistency across Codex texts. While integrating all relevant elements into one place is helpful, ensuring alignment with existing guidance remains the key consideration.
- On the **exchange of information** (section 7) various elements related to the process is included. The EWG was asked whether the annex should include elements such as preassessment, prelisting and approval procedures. The views differed from those who were of the opinion that this should not be included as this was considered outside the scope, to others that would welcome the inclusion and thought this would contribute to a clearer and more comprehensive understanding of the application of the annex. The EWG was asked whether they agreed that existing Codex texts (such as CAC/GL 47-2003 and CXG 89-2016) already provide principles on import control and assessments, which should guide their use. Most of those commenting agreed that existing Codex texts already provide principles on import control and assessments and preferred not to include preassessment or prelisting and therefore “preassessment” and “prelisting” are not included.
- Other discussions:
 - There have been comments regarding importing countries approval of establishments in exporting countries. Most members seem to agree not to including this concept, based amongst others on guidance already provided in CXG 89-2016 paragraph 4.2c.