European Union comments on
Codex document CX/CAC 12/35/12

CAC Agenda Item 10 b): DRAFT CODEX STRATEGIC PLAN 2014-2019

The Member States of the European Union would like to submit the following comments on the Draft Strategic Plan:

- **Objective 1.2**
  
  - **Activity 1.2.1:** Develop a process for Pay particular attention to the early identification of the need for new standards, guidelines, and recommendations, particularly with respect to emerging food safety risks, unfair practices in food trade and the development of new technologies".

  **Rationale:** There is not necessarily a need to create a new process for the early identification of needs for new work but more attention should be paid to this task by using the existing processes. The term "standard" covers all Codex texts. The dual mandate of Codex has to be covered in the identification of needs for new work.

- **Activity 1.3.2:** Promote collaboration in standards development with the OIE, and IPPC and other relevant inter-governmental organisations on standards that affect Codex and those organisations.

  **Rationale:** There are also other inter-governmental organisations, in addition to the OIE and IPPC, which develop standards, which may cover areas of Codex work (e.g. IAEA).

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

  **Rationale:** The cooperation with non-governmental standards setting organisations should remain within the limits set by the Procedural Manual, the Principles Concerning the Participation of International Non-governmental Organizations in the Work of the Codex Alimentarius Commission.

**Add new activity 2.1.3:**
2.1.3 Recognise, and use to the fullest, Codex's role as risk manager in the development of international and regional standards, in order to fully take into account factors that affect food safety and fair practices in the food trade, for example, emerging risks, food security, shifting population patterns, climate change and consumer concerns.

Add new activity 2.1.4:

2.1.4 Communicate widely with interested parties, other international standard-setting organisations and the public at large, the rationale behind Codex decisions taken in fulfilment of its mandate to protect the health of consumers and ensure fair practices in the food trade.

Rationale: New activities on risk management and risk communication should be added in order to present a complete picture of risk analysis, including the three components of risk analysis, i.e., risk assessment, risk management and risk communication. Much of the language used is 'borrowed' from previous paragraphs such as 1.2.3.

Activity 2.2.3: Explore all other 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.

Rationale: This adds clarity.

Activity 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: Wording “with the involvement of interested Codex Members” suggests limiting participation of member countries in the decision-making process.

Activity 3.1.3: Develop guidance for mentoring a formal mentorship initiative, building on lessons learned from existing informal programs.

Rationale: It may be more appropriate to develop guidance on mentoring rather than a “formal initiative”.

Delete 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.

Delete Activity 3.3.1: Establish strategic partnerships with relevant organisations with relevant economic development programs to identify opportunities to support the respective mandates of each.

Rationale: The objective and the activity fall outside the mandate of Codex. The CAC would thus not be able to deliver on them. The needs of developing countries are comprehensively addressed under objectives 2.3, 3.1 and 3.2.

Objective 4.1: Ensure an effective, efficient, transparent, and flexible and consensus based standard setting process for the timely adoption of standards.
**Rationale:** It is important to include the core Codex value of consensus building in the objective covering the standard setting process. The reference to a timely adoption of standards becomes redundant if the comment on activity 4.1.1 is taken on board, as per the conclusions of the 27th session of the CCGP.

**Delete Activity 4.1.1:** Review Codex standards setting processes and implement improvements to ensure efficient and effective operations and timely adoption of standards.

**Rationale:** The 27th session of CCGP\(^1\) concluded that there is no need to amend the standard setting process for the adoption of standards.

**Activity 4.1.2:** Explore the reasons for development of flexible processes to address 'roadblocks' in Codex standards setting procedures.

**Rationale:** In line with the CCGP conclusions (27th session), there is no need to develop new decision making processes. This notwithstanding, the reasons for roadblocks could be further explored in order to reach a common understanding between Codex members.

\(^1\) Paragraph 12, REP 12/GP.