

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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REQUEST FOR COMMENTS ON THE DEVELOPMENT OF THE CODEX STRATEGIC PLAN 2026-2031 –
PART 1 – HOW CODEX WORKS AS PART OF THE MULTILATERAL SYSTEM ON FOOD AND TRADE

Comments in reply to CL 2023/65/OCS-EXEC

Comments of Australia, Brazil, Canada, Colombia, Costa Rica, Egypt, European Union, Indonesia, Indonesia, Iran, Japan, Kazakhstan, Kyrgyzstan, Malaysia, Mauritius, New Zealand, North Macedonia, Norway, Paraguay, Peru, Saudi Arabia, Singapore, Singapore, Türkiye, United Arab Emirates, United Kingdom, Uruguay, United States of America and CropLife International, ENCA, FIVS, GAFTA, GAIN, ICBA, IFT, International Baby Food Action Network

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2023/65/OCS-EXEC issued in August 2023. 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.

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<p>Q1 Australia agrees that the examples that have been presented in Annex 1 are good examples of how Codex is already supporting One Health and Sustainable Development Goals under its current strategic plan. We would note that the examples are all standards developed to advance the primary purpose of Codex and exemplify the role of Codex in ensuring that food safety approaches don't get in the way of fair practices in the food trade. Finding this balance is the core work of Codex. That important role won't diminish in the context of countries transforming their food systems with new technologies and data-driven solutions.</p> <p>The current strategic plan places a key focus on ensuring Codex can address current and emerging issues in a timely manner. This strategic priority will be even more important as we move forward in the next strategic planning cycle. We will need to be able to efficiently develop consensus on issues within our statutory purpose so that Codex is not a blocker to Members' implementation of initiatives to improve sustainability of their food systems.</p> <p>As foresight / futures thinking concedes, it is difficult to predict the future, but we can monitor trends and be prepared to be able to act quickly. That is why we think Codex should not narrow its top-down strategic priorities to particular standards or certain elements of environmental sustainability, for example. By doing that we would be doing the One Health agenda a disservice. Rather, we should retain the flexibility within the system for Codex to consider issues as they arise and to develop standards as they are needed, including those that could deliver environmental benefits. If we had adopted a rigid top-down approach in the current strategic plan, we could have found ourselves constrained and unable to develop standards that responded to the pandemic situation, such as the guidelines on remote audit in regulatory frameworks.</p> <p>Codex has conducted a thorough examination of its readiness to address potential issues related to new foods and production systems. This outcome of this review should give us comfort that Codex is well equipped to, on a case-by-case basis, develop standards within its statutory purpose that can contribute to One Health and Sustainable Development Goals. The review has so far found that the current mechanisms and processes are sufficient and that there is sufficient flexibility for committees to assess whether new work should be undertaken in Codex on issues related to new foods. Generally, subject committees remain best placed to examine if responsibilities under their mandates are sufficient as and when specific issues are brought forward by members. There are also mechanisms for CCEXEC to examine cross-cutting issues and for time-limited task forces to be set up under the Commission.</p> <p>Codex is also undertaking further work to ensure the avenues for beginning new work are as clear as possible. The Codex Secretariat has been tasked with preparing guidance on how to apply existing procedures to ensure that Members do not perceive procedural obstacles to submitting new proposals for work.</p> <p>As such, we think any statement in the strategic plan about the role of Codex, with respect to the above drivers for change, should be focused on Codex being an enabler of context-specific sustainability policies and One Health approaches, through our ability to rapidly develop guidance on food safety risks and implications for nutrition and fair practices in food trade associated with evolving food systems.</p> <p>The statement should also recommit to the underpinning science and risk basis of Codex standard setting and the importance of resourcing this aspect. The multilateral rules-based trading system, and its underpinning science and risk-based decision making of which Codex is a</p>	<p>Australia</p>

key component, will be essential to accelerate the transition to best practice sustainable agricultural production, while meeting increased global demand for food and nutrition.

Transparency is also a key element of being able to contribute to the One Health approach and we could restate our commitment to this core Codex value. The work done to develop draft guidance on the application of the Statements of Principle concerning the role of science in the Codex decision making process and the extent to which other factors are taken into account, has demonstrated how Codex can be clear, in its reporting, about what factors have and haven't been taken into account in the risk management decisions.

Q2 The Quadripartite One Health Joint Plan of Action is an excellent platform to leverage for awareness raising. The quadripartite should keep Codex updated on its implementation so that we can take advantage of opportunities for intersections of our work.

The question above talks about Action Track 4, which most specifically references food safety, but there are other action tracks that set out real foundational work that will improve the ability of countries to implement context-specific approaches. Codex should encourage this as it could improve the uptake and the impact of Codex standards not just in the sense of their primary purpose but also to enable effective sustainability policies.

Our statement on the role of Codex could focus on how we could utilize the broader One Health agenda to promote integration of Codex standards and risk analysis into members' national contexts. This can be a difficult task enough even without trying to do it in a national One Health framework, but we could leverage the resource mobilization under the Quadripartite Joint One Health Joint Plan of Action which has a focus on capacity building, especially for LMICs. We would be extending our commitment to the Codex core values of collaboration and inclusivity.

For example:

- Action Track 4: Strengthening the assessment, management and communication of food safety risks of the notes the action track builds on the momentum of the FAO and WHO food safety strategies to support their implementation under the One health approach without interfering with their governance structures. There are many proposed actions under this action track that have the potential to make a real difference to the way that Codex member countries can adopt Codex standards into their own One Health frameworks. This will help to promote wider adoption and assist with broader implementation of Codex standards, and we could leverage this opportunity to improve uptake of Codex standards. For example, the activities under Action 4.1 Strengthening the One health approach in national food control systems and food safety coordination will leverage CCFICS guidelines.
- Action 4.2 Utilise and improve food systems data and analysis, scientific evidence and risk assessments in developing policy and making integrated risk management decisions, aims to build countries' capacity to use scientific and risk assessment to the greatest extent feasible in making risk management decisions, including by supporting countries to identify and evaluate new and emerging food safety issues and integrate food safety risk analysis into their food systems. This could have a real positive impact for Codex by increasing the capacity of Codex Members to contribute strongly to the Codex standard setting process, by bringing proposals for new work and contributing to calls for data and evidence.

<p>Q1 Brazil recognizes the importance of new challenges in today's world such as "goals around sustainability, one health, food security and environmental protection". However, sustainability is a broad and highly relevant topic, which is addressed within the scope of dedicated forums, such as UNFCCC, CBD, and UNCCD, derived from the United Nations Conference on Sustainable Development in 1992. FAO and WHO also deal with the topic in specific aspects. Expanding inappropriately the discussion on sustainability in a forum such as Codex Alimentarius would not bring any substantial improvements to the topic. The Codex mandate is still appropriate and does not require any changes at this time.</p> <p>Codex should support these broader global goals, by doing its work as it already does, developing international food standards that address any potential issues for consumer health protection and help to promote fair trade practices. The implementation of initiatives to promote sustainability interests should be evaluated on a case-by-case basis, within the Organization's mandate.</p> <p>Extrapolating the understanding of "sustainability interests" to Codex Alimentarius is definitely not the most appropriate approach. A careful process of analysis would be necessary, so as not to distort the Organization's objective, avoiding overlaps.</p> <p>Furthermore, a partial and limited view of sustainability has been used by some countries or blocs as grounds for imposing restrictions on international trade in a unilateral, extraterritorial and discriminatory manner, particularly harming developing countries. Unilateral measures have the potential to distort international trade, exclude small producers and impose excessive compliance costs, without considering the specificities of each country. If the Codex Alimentarius mandate is modified to include sustainability issues, it can give way to unjustified barriers against trade, which is not compatible with the Codex purpose to ensure fair practices in the food trade.</p> <p>Q2 Brazil understands that Codex Alimentarius is already an organization that advocates for multinational, multisectoral, and multidisciplinary collaboration. For this reason, Brazil recognizes the benefits of this collaboration system that already exists in the organization and is convinced that this system works excellently, which is why it proposes maintaining the system as it currently stands.</p>	<p>Brazil</p>
<p>Q1 From Canada's perspective, Codex contributes to the broader goals listed above by delivering on its mandate to protect the health of consumers and to ensure fair practices in the food trade; the adoption of international food safety standards is an underlying enabler for any other goals related to the consumption of food.</p> <p>As noted in the draft blueprint on the future of Codex, while not 'labelled' as being directly related to broader global goals, Codex standards for food safety, quality and nutrition, may contribute to addressing broader emerging issues. As listed in the draft blueprint, CCFH developed guidelines on the safe use and re-use of water which may help counter the impacts of water scarcity. These guidelines were developed under the goals and objectives of the current Strategic Plan, were founded on scientific advice, and developed by food hygiene experts.</p> <p>Canada believes that the "Drivers for Change" section in the current Codex Strategic Plan (2020-2025), remains mainly relevant and provides an overview of ways on how Codex standards can support achievement of broader goals.</p> <p>In doing so, and as noted in the blueprint section, Canada is of the view that the priority for Codex standards needs to be:</p> <ul style="list-style-type: none"> i) relevant, fit for purpose and useful for Members; ii) clear in their objectives; iii) responsive to the need for protecting the health of consumers and ensuring fair practices in food trade; iv) responsive to relevant evolving global challenges; and v) founded on scientific evidence. 	<p>Canada</p>

<p>It is important that any statement or relevant sections in the Codex Strategic Plan 2026-2031 promote a common understanding on the role of Codex in addressing these challenges, consistent with its mandate.</p> <p>Q2 From Canada's perspective, collaboration already takes place between Codex and its Members across the multilateral system and benefits from such collaboration is already being seen. For example, Codex Members participate in these efforts through their direct engagement with the FAO, UNEP, WOAHA and WHO. In their collaboration in the multilateral system, The Codex Secretariat and its Members can take the opportunity to promote Codex standards and its risk analysis principles as the basis for measures related to food safety, quality, and nutrition, as well as highlight the importance of collaboration on scientific expertise with the Joint FAO/WHO risk assessment bodies. This helps to ensure that the work and contributions of Codex are understood and considered in broader discussions, as well as helps to minimize duplication of efforts with respect to the work within the Codex mandate. In addition, the WTO SPS Committee has a standing agenda item at its meetings for international standard setting bodies, including Codex, to provide updates on their work. This further helps to promote the value and benefit of Codex standards.</p> <p>In 2018 and 2019, the Codex Alimentarius Commission held side-event panels with observer organizations who provided their views/work on specific topics under discussion in Codex. Re-invigorating these side-event panels may be an effective way to further multi-national, multi-sectoral, and multi-disciplinary discussions, allowing those involved to exchange information and share experiences, which could promote further collaboration.</p>	
<p>Q1 - Las prioridades del Codex, teniendo en cuenta lo anterior, deberían estar enfocadas en:</p> <ul style="list-style-type: none"> - Ofrecer alternativas para la disminución de brechas generadas por el desarrollo tecnológico de los países, con el propósito que los datos científicos considerados previo a la adopción de normas provengan de todos los países miembros y se garantice la equidad. - Priorizar los asuntos que actualmente desatan el aumento de enfermedades crónicas, así como el deterioro de la salud para ser abordados desde la perspectiva del mandato del Codex. <p>El trabajo multidisciplinario, multinacional y multisectorial, trae consigo beneficios que no se limitan a la interacción directa, sino que aportan un ejercicio de alto valor agregado, disminuyendo la asimetría de información entre las partes y facilitando la interacción, por lo tanto, defendemos el trabajo que, desde su mandato, el Codex Alimentarius pueda aportar en apoyo al plan de acción; reconocemos y destacamos la importancia de la institucionalidad establecida para tratar temas ajenos al mandato del Codex Alimentarius, siendo dicha institucionalidad la encargada de abordar y liderar acciones concretas, el Codex Alimentarius podrá suministrar los insumos que le sean requeridos en el marco de su mandato.</p> <p>Q2 El Codex Alimentarius como organismo enfocado en alcanzar objetivos legítimos para el cumplimiento de su mandato, con base en la protección de la salud y las prácticas de comercio justas podría prestar apoyo en el cumplimiento de los objetivos mundiales desde su competencia, con acciones encaminadas a suministrar la información que le sea requerida a los organismo competentes para alcanzar los objetivos que se escapan del quehacer del Codex Alimentarius.</p> <p>El Codex aporta con sus documentos al objetivo de la seguridad alimentaria, a través de la creación de normas que favorecen la inocuidad y el comercio justo de los alimentos, ofrece alternativas que impulsan la producción de los alimentos para que sea suficiente y permita abastecer a la población mundial, lo anterior teniendo presente que las normas alimentarias, favorecen el crecimiento de la producción bajo</p>	<p>Colombia</p>

<p>estándares seguros y equitativos en el comercio, así mismo, favorecen la transferencia de conocimiento.</p> <p>En cuanto a la protección de la salud de los consumidores, el Codex a través de las normas ofrece información clara y precisa sobre el consumo de los alimentos, así como brinda garantías sobre la oferta de alimentos inocuos. En este sentido, el aporte que se realiza desde esta perspectiva en materia de salud humana es considerado como un elemento transversal para el fortalecimiento de la cadena de abastecimiento, con repercusiones directas en el consumo informado de alimentos, ofreciendo opciones a los consumidores que impactan en su salud; además de priorizar aspectos que se consideren peligrosos.</p>	
<p>Costa Rica reconoce la importancia de asegurar un acceso sostenible a los alimentos, lo cual requiere una producción que proteja nuestros recursos naturales. En este sentido, el CODEX desempeña un papel crucial al promover estándares que previenen la imposición de barreras técnicas al comercio internacional de alimentos. Por tanto, es esencial que el CODEX priorice efectivamente el cumplimiento de sus objetivos, como lo es garantizar prácticas equitativas en el comercio de alimentos, abordando estas necesidades con un enfoque respaldado por evidencia científica.</p> <p>En lo que respecta a la protección de la salud, el CODEX contribuye a través de su enfoque en la inocuidad alimentaria, respaldando sus recomendaciones con un sólido respaldo científico, lo que fortalece la solidez y credibilidad de las mismas.</p> <p>Asimismo, es imperativo que el CODEX intensifique sus esfuerzos para satisfacer las necesidades de sus miembros, especialmente aquellos en vías de desarrollo, teniendo en cuenta que las normas del CODEX constituyen la base fundamental para sus marcos legislativos.</p> <p>Por todo lo expuesto, el CODEX debe asegurarse de que todos sus documentos siempre estén alineados con sus objetivos y evitar abordar temas que, aunque estén relacionados con los alimentos, puedan exceder el alcance de su mandato.</p> <p>Q1 Elaboración de directrices relacionados con la composición nutricional que permitan apoyar a otros Organismos en promoción de patrones de alimentación saludables y sostenibles, en línea con los objetivos de salud y medio ambiente. Siempre en el ámbito de sus competencias.</p> <p>Elaboración de directrices que prevengan el "greenwashing", y garanticen prácticas comerciales equitativas en las declaraciones relacionadas con la sostenibilidad.</p> <p>El Plan de Acción Conjunto Cuatripartito "Una sola salud" se centra en apoyar y ampliar las capacidades en seis ámbitos, entre ellos la evaluación, gestión y comunicación de los riesgos para la inocuidad alimentaria. También promueve la colaboración multinacional, multisectorial, multidisciplinaria.</p> <p>Podrían desarrollarse directrices para minimizar el desperdicio de alimentos en todas las etapas de la cadena de suministro.</p> <p>Elaboración de directrices relacionados con la composición nutricional que permitan apoyar a otros Organismos en promoción de patrones de alimentación saludables y sostenibles, en línea con los objetivos de salud y medio ambiente. Siempre en el ámbito de sus competencias.</p> <p>Elaboración de directrices que prevengan el "greenwashing", y garanticen prácticas comerciales equitativas en las declaraciones relacionadas con la sostenibilidad.</p>	<p>Costa Rica</p>

<p>Q2 En el ámbito de sus competencias y los conocimientos especializados de cada una de las organizaciones miembros del cuatripartito podría aportar:</p> <p>En el contexto de la inocuidad de alimentos, con este enfoque se podría ayudar a prevenir brotes de enfermedades transmitidas por alimentos y cualquier otro incidente relacionado con los alimentos o su contaminación que permitirán brindar respuesta expedita y coordinada para minimizar el impacto en la salud pública.</p> <p>Podría facilitar el intercambio de información para la toma de decisiones y la formulación de políticas en temas relacionados con la salud humana, la salud animal, la agricultura, promover prácticas agrícolas y alimentarias que contribuyan a la sostenibilidad del futuro de los sistemas alimentarios.</p>	
<p>Q1 In order to support “the broader global goals around sustainability, one health, food security and environmental protection through the development of international food standards that address any potential issues for consumer health protection or fair trade practices arising from implementation of initiatives to advance sustainability interests”, Codex may contribute to other areas such as;</p> <ol style="list-style-type: none"> 1. Codex has developed guidance to facilitate the use of electronic or paperless certification for food trade and guidance on the use of remote audit and verification in regulatory frameworks, which exemplifies how Codex is responding to new challenges in a rapidly evolving world. 2. Adoption of the landmark texts on countering antimicrobial resistance and the guidelines that the Codex Committee on Food Hygiene has developed on safe use and reuse of water in food production and processing to help counter the impacts of water scarcity are other examples of how Codex is addressing emerging issues. 3. Adapting the Agrifood System Good Practice and preventive control approaches to limit the incidence of chemical hazards and pathogen risks by (i) reducing the likelihood of transmission risk of pathogens and the inclusion of food hazards in the food supply chains, (ii) smart management of natural ecosystems and the Agrifood system, and (iii) controlling the human-livestock interface within the Agri-food system. 4. Advancing and encouraging the application of technology-based solutions, automation, Artificial Intelligence, and Blockchain technology for food production-to-consumption supply chain traceability locally and globally. 5. Addressing climate change and outlining its multifaceted impacts on various food safety hazards (both biological and chemical). 6. Entailing special farming systems of food within urban cities and towns and indoor vertical farming approaches (hydroponic, aquaponic, and systems). 7. Codex has set higher mycotoxin MLs for foods for short term use to help ensure food availability in emergency situations and while practices to reduce mycotoxin contamination are still being implemented. Such approaches, with the commitment to review these after a clearly defined period, in addition to ensuring food delivery in emergency situations, also help reduce food waste. 8. The Codex General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) includes provisions for date marking. The clear distinction between “Use-by-date” (expiration date) and “Best-before-date” (Best Quality Before Date) may contribute to reduction of food waste. <p>Q2 1. Connecting Food Systems and Health by adopting “A Global One Health Approach” that embraces and reflects the effect of the incidence of epidemics of zoonotic infectious diseases (caused by pathogens that spread from animal husbandry and human consumption) and that caused by Antimicrobial Resistance (AMR) on the food security and consequently disrupting the local and/or global food supply chains. Climate change, urbanization, and animal-human interface should be considered in the evaluation of the risk of these new and (re-) emerging hazards.</p> <p>This requires the support of risk assessment (knowledge of the incidence and burden of disease associated with hazards/food combinations)</p>	<p>Egypt</p>

<p>and management of these risks through developing;</p> <p>(i) end-product standards (such as MRLs/MLs, microbiological limits), and/or</p> <p>(ii) codes of practice and guidelines, to reduce the likelihood of these risky/threat events.</p> <p>2. Giving more attention to the vulnerable populations (such as poor people, pregnant women, infants, elderly people, and people with weakened immune systems) that are at an increased risk for food poisoning by adopting more strict food safety/serving standards.</p>	
<p>Q1 The EUMS acknowledge that the purpose of Codex as described in Article 1 of the Procedural Manual including “a) protecting the health of the consumers and ensuring fair practices in the food trade” and “b) promoting coordination of all food standards work undertaken by international governmental and non-governmental organisations” is broader than food safety, nutrition, and quality as currently considered in the development of Codex standards. The EUMS welcome this question and support full exploration of the potential of Codex to support global goals around sustainability, One Health, food security and environmental protection.</p> <p>The EUMS are of the view that CAC should strive to prioritize such normative work that optimizes consumer health without compromising the health and wellbeing of animals or ecosystems.</p> <p>To this end a first priority for Codex should be to systematically integrate considerations associated with the One Health approach and on sustainability in the submission of new work proposals. This priority includes the revision of the current procedures for the development of Codex MRLs of pesticides and veterinary drugs or Maximum Use Levels of additives. This approach would enable Codex to prioritize work that brings the most benefits to the sustainability of food systems. It would also help to identify from the outset possible concerns that would need to be addressed in the context of a One Health approach including the need to broaden the expertise used by Codex or to put in place close collaboration with other international organisations.</p> <p>The second priority would be to ensure that Codex members remain fully abreast of the developments and needs associated with the transformation of systems and emerging challenges and in capacity to address these challenges. In this respect, the EUMS appreciate the ongoing discussion on New Food and Production System that was initiated by FAO and WHO. Codex should continue to assess information on emerging risks on food provided by its Members, its parent organisations and other international organizations.</p> <p>Q2 As one of the purposes of Codex is the coordination of all international food standards, the EUMS are of the view that Codex can provide a major contribution to the One Health Joint Plan of Action. The EUMS note that the first paragraph of point 2.2.2 of Annex I states that</p> <p>“Recent discussions in CAC and elsewhere have drawn attention to the broad meaning of terms such as ‘health’ and ‘fairness’. The meaning of these are well understood as related to food safety and quality in the context of Codex standard setting to ‘protect the health of consumers and ensure fair practices in the food trade’. In broader contexts the terms ‘health’ and ‘fairness’ will naturally incorporate different aspects depending on the nature of the global initiative or the focus of the multilateral institution, for example, Codex standards, guidelines and codes of practice, should be implemented together with standards for other areas so as to have a holistic approach and address the synergistic impact of hazards from the diet, water, air and all sources when setting risk management measures.”</p> <p>Codex, by expanding its work on the coordination of international food standards including the International Organization for Standardization (ISO), would allow to facilitate the implementation of a holistic approach that is required for a One Health approach.</p>	<p>European Union</p>

The collaboration of Codex within the multilateral system would also enable to identify possible weaknesses in the current system to support the transformation of food systems. The long-standing experience of Codex for the development of science-based standards could be used to address these weaknesses.

In addition to the high-level global initiatives identified under paragraph 2.2.1, the EUMS note that the UN Framework Convention on Climate Change (UNFCCC), the UN Biodiversity Convention (CBD), the Rotterdam Convention, the Stockholm Conventions, or the Organization for Economic Cooperation and Development (OECD) are carrying out work that is relevant to food systems.

The review of Codex priorities (see reply to question 1) and the collaboration across the multilateral system should ensure that Codex standards:

- fully take into considerations recommendations or normative efforts of other international organization dealing with One Health issues and the sustainability of food systems;
- rely on a more comprehensive scientific basis;
- do not duplicate normative efforts of other international “One Health” organizations, including the members of the Quadripartite.

Q1 Indonesia welcomes the efforts of Chairperson, Vice-chairpersons and the Codex Secretariat in engaging with members to develop the Codex Strategic Plan 2026-2031, especially to enhance Codex’s role as part of the multilateral system on food and trade.

Food safety and fair practices in food trade are essential for achieving broader global goals such as sustainability, one health, food security and environmental protection. These goals are increasingly relevant in the current international context, which have a great impact on the food sector. As an international food standard-setting body recognized by WTO, Codex is the primary source of science-based food standards and the international reference for food safety and fair practices in food trade.

Indonesia is of the view that Codex has played the role in supporting the broader global goals through its dual mandate in protecting consumer health and ensuring fair practices in food trade. The current Codex Strategic Plan, particularly Goal 1: address current, emerging and critical issues in a timely manner, showed the commitment of Codex works in achieving of these broader global goals.

The real example of how Codex supports sustainability is the development of Draft Guidelines on the Safe Use and Reuse of Water in Food Production within the Codex Committee on Food Hygiene. The draft guidelines can help to combat the impact of water scarcity, while ensuring water safety. In addition, One Health Joint Plan of Action (2022–2026), under Action track 4: Strengthening the assessment, management and communication of food safety risks also reiterated the critical role of Codex as a science-based international standard-setting body.

For the reasons above, Indonesia believes that Codex standards have contributed to achieving broader global goals (area other than food safety, quality and nutrition), which are relevant with its dual mandate. So, in general, Indonesia supports Codex’s effort to align with the broader goals, as long as they are consistent with the health protection of consumers and promotion of fair practices in international food trade.

Q2 The collaboration across the multilateral system for trade and food, such as under the Quadripartite One Health Joint Plan of Action, aims to improve the health of humans, animals, plants and the environment by better preventing, predicting, detecting and responding to health

Indonesia

<p>threats and contributing to sustainable development. Indonesia is of the view that Codex and its Members can have benefit from this collaboration, particularly for setting priorities and identifying current, emerging and critical issues in developing international food standards, which are consistent with the Codex dual mandate of protecting consumer health and ensuring fair practices in the food trade.</p>	
<p>Q1 The three dimensions of sustainable development deal with social (humans), economic and environmental issues, while in the Codex standards, the two major goals of consumer health (humans) and fair practices in food trade (economics) are mentioned. It seems that the environmental dimension has been neglected in the Codex standards, so it is suggested that in addition to mentioning consumer health and economic aspects, the issue of environmental protection should also be mentioned in the main goals of the Codex standards.</p> <p>In the social dimensions of the Codex standards, it has addressed the issues of risk analysis (food risk assessment, management and communication) and food safety, and in the economic dimensions, it has addressed the issues of quality and authenticity and the methods of conformity assessment and certification for the food trade. Codex standards are mainly compiled in line with goals 2, 3, 12 and 17 of SDG to include the Zero hunger, Good health and well-being, Responsible consumption and production, Partnership for the goals. However, the following topics still need to be reviewed and developed related requirements and standards.</p> <p>Today, with the growth of science and technology and the production of food from new sources, it is necessary to pay more attention to sustainable development goal 8 (decent work and economic growth) and goal 9 (industry, innovation and infrastructure). Even to help achieve the 13th goal of sustainable development (Climate action), perhaps the use of new production methods or policies to reduce red meat and the use of alternative foods and proteins can be considered.</p> <p>In addition, to support goals 14 and 15 to preserve “life below water”, and “life on land” as well as diversity of species, Codex standards with things such as prohibiting the consumption of some species at risk of extinction or limiting fishing and killing in some geographical areas in line with biological recommendations Align environment.</p> <p>Q2 Regarding the multinational, multi-sectoral and multi-disciplinary cooperation programs, it is also possible to mention the development of planning and implementation of trainings and preventive programs to reduce food contamination (objectives 4 and 17 of sustainable development). For example, methods of preventing or limiting the growth of fungi in agricultural products and reducing fungal toxins that can be used as a joint regional cooperation program to improve the quality of agricultural products</p>	<p>Iran</p>
<p>Q1 Codex, as a science-based international standard-setting organization, has contributed to the advancement of SDGs, in particular the goal 2, 3, 12 and 17 for safer, better food for everyone, everywhere, within the mandate, i.e., protecting consumer health and ensuring fair practices in food trade, through the development of many Codex standards under the current Codex Strategic Plan 2020-2025. We are confident that Codex could continue to work for global broader issues and challenges within the mandate in a similar way.</p> <p>Raising awareness of Members on global emerging issues would be an important first step for Codex to address them within the mandate. In that sense, holding a side event in the margin of Codex meetings and/or having an agenda to discuss them in the meetings would be useful for Members to sensitize to them and to consider how Codex could address them with robust scientific basis within the mandate. Information on activities of FAO and WHO relevant to the work of Codex would continue to provide a valuable opportunity as well.</p> <p>Q2 Among a set out of activities of Action Track 4 (strengthening the assessment, management and communication of food safety risks) of One Health Joint Plan of Action, activities with the aim of enhancing capacities for food safety risk analysis and for participation of countries in Codex standard setting works through a multisectoral and coordinated approach are expected to provide countries with valuable opportunity to enhance overall capacity to conduct work on scientific qualified data for the establishment of food safety standards. We believe that Codex</p>	<p>Japan</p>

<p>and its Members will benefit from outcomes of these activities in terms of the development of Codex standards based on more robust science and Codex risk analysis principles, as risk analysis is fundamental to the scientific basis of Codex food safety standards.</p>	
<p>Q1 Комиссия «Кодекс Алиментариус», прародителями которой являются международные организации ФАО и ВОЗ, при разработке стандартов учитывает подход "Единое здоровье", принципы продовольственной безопасности и защиты окружающей среды. Стандарты Кодекса должны оказывать содействие в управлении риском в отношении пищевых продуктов и косвенно связанных с ним других смежных сфер. Казахстан полагает, что приоритет при разработке стандартов состоит в сохранении здоровья потребителей наряду с минимизацией негативного влияния на здоровье животных и окружающую среду, что является основой подхода «Единое здоровье».</p> <p>Q2 Казахстан поддерживает совместный план действий «Единое здоровье». Совместные действия, обмен опытом и знаниями способствуют сохранению здоровья потребителей, животных и улучшению торговли и других взаимодействий на национальном и международном уровнях.</p>	<p>Kazakhstan</p>
<p>Q1: Codex standards, put in place for food safety, quality, and nutrition, may also contribute to other areas. In your view, how could Codex support “the broader global goals around sustainability, one health, food security and environmental protection through the development of international food standards that address any potential issues for consumer health protection or fair trade practices arising from implementation of initiatives to advance sustainability interests”? Where do you see particular priorities for Codex?</p> <ul style="list-style-type: none"> ·Codex as part of the UN system and referenced standard setter for the WTO needs to take effective and accountable decisions relating to food across a range of increasingly urgent global challenges. ·CAC Strategic Plan 2020-2025 recognizes Codex standards can assist members in implementation efforts to achieve the SDGs by 2030 (highlighting SDG2, 3, 12 and 17), but Codex has not put in place coherent approaches for discussing and prioritizing new work that is relevant and conducive to the SDGs and the transition towards more sustainable food systems. ·Codex currently does also not consider to what extent the implementation of its standards can have a negative impacts on the achievement of SDGs and the goal food systems transformation. ·To support global goals around sustainability, one health, food security and environmental protection CAC should strive to <ul style="list-style-type: none"> o prioritize such normative work that optimizes consumer health without compromising the health and wellbeing of animals or ecosystems. o eliminate or minimize negative impacts on SDGs and the goal of sustainable food systems transformation that can derive from the implementation of Codex standards by consulting and coordinating its standard development work with appropriate organizations. <p>Q2: The Quadripartite One Health Joint Plan of Action^[1] focuses on supporting and expanding capacities in six areas, including the assessment, management and communication of food safety risks. It also promotes multinational, multi-sector, multidisciplinary collaboration. What benefits might there be to Codex and its Members from such collaboration across the multilateral system for trade and food?</p> <ul style="list-style-type: none"> ·We support the One Health Joint Plan of Action (OHJPA) and agree with its relevance for Codex work. 	<p>Kyrgyzstan</p>

<p>·We note that part of the purpose of Codex is to promote coordination of all food standards work undertaken by IGOs and NGOs and to determine priorities and initiating and guiding the preparation of draft standards through and with the aid of appropriate organizations (<i>Article 1 of the Statutes of the Codex Alimentarius Commission</i>).</p> <p>·The key benefits we see from enhancing “One Health collaboration” are:</p> <ul style="list-style-type: none"> o a broader scientific basis for international food safety risk management decisions o Codex standards that help regulators take more preventive actions on the prevention and reduction of long term food safety risks o Codex standards that do not contradict other international SPS risk management recommendations or normative efforts by other international organization dealing with One Health issues o Codex standards that do not duplicate normative efforts of other international “One Health” organizations (e.g. members of the Quadripartite) 	
<p>Q1 Malaysia recognises the importance of sustainability, food security, one health and environmental protection agendas and notes that there is ongoing work by international organisations that overlook this matter including the FAO, WHO, WOAHA and UNEP- One Health Quadripartite initiatives. We agree that for Codex to stay relevant, it should keep abreast with global work on related current or emerging issues including work in other international organisation. In this regard, Codex can contribute its expertise through developing its standards and related text in food safety and quality within its mandate in protecting the health of the consumers and ensuring fair practices in the food trade. We believe Codex through its work has already supporting broader global goals by ensuring sufficient level of protection of consumer health through the food safety standards, based on scientific evidence. Collaboration, information sharing, and updates across the international organisations would assure complementing roles between the organisations and prevent overlapping initiatives.</p> <p>Q2 The Quadripartite One Health Joint Plan of Action highlights activities to be undertaken by the four organisations collaboratively and complements the individual organizations’ existing workplans. In area of food safety, one health collaboration could strengthen Codex role in developing its text and to be better prepared in managing food safety concern especially on emerging issues as well as for the future work plan.</p>	Malaysia
<p>Q1 Safety of foods come into play in the production and commercialisation of food but indirectly linked to several aspects such as uses, food loss wastage prevention and disposal. Codex could become an active partner in developing guidelines. Thus, Codex could work in collaboration with other organisations (UNECE/other relevant bodies) to promote standardisation in relevant areas of interest, including but not limited to:</p> <ol style="list-style-type: none"> 1. Development of standards/guidelines/codes of practice to promote sustainable and recycling practices e.g.: organic farming, enhance use of natural means versus pesticide use (e.g use of moringa or acacia as fertiliser and use of onion/garlic/vinegar extracts against pests); devise guidelines/standards for the responsible land conversions/land use, water management and waste management. 2. Develop good practices or guidelines for when and how to safely fortify foods for example flour fortification, development and use of medicinal/ herbal infusions with emphasis on barley/linseed/chia. 3. Devise guidelines /standards for better monitoring of sea produce and products for heavy metals, species identification and labelling 4. Promoting better animal health through better management of feeds, antibiotics, growth promoters and GMO use. Can refer back to the problems of mad cow disease. 5. Develop guidelines/practices/standards for safe and hygienic production and transportation of foods with emphasis on social 	Mauritius

<p>consideration such as avoiding child labour, ensuring safety and health of workers, waste disposals/ use of renewable energy in agriculture/.</p> <p>6. SIDS face a lot of climatic and other problems pertaining to its geographical location, may be can devise regulation, codes of practice, guidelines to develop/use salt resistant varieties of foods; to adapt to adverse conditions: land layering/landscaping for different plant and ornamental plantation; promote diversity in agriculture</p> <p>7. Development of guideline on how to transport/store and use foods particularly for consumers. In addition, guidelines for consumers on choice of foods. Guidelines for supermarkets to dispose of expired or other wastes food products to be available</p> <p>8. develop code of practice to support food waste reduction initiatives</p> <p>Q2 1. Better management of zoonotic diseases</p> <p>2. Collaborate to set up an information sharing platform where the link between environment, animal and food safety information can be shared in a real time manner to enable actions to be taken in a real time manner</p> <p>3. Sharing of experience from the environment and animal sector to better assist in codex work on foods</p> <p>4. Can set up holistic approach to food safety, environmental and animal health.</p> <p>5. Can collaborate to better educate the population including farmers and food business operators and other stakeholders on the link among human, animal and environment health;</p> <p>6. Previously, I mentioned about the case in China whereby standards are being set in every sectors: construction, landscaping, farming, production. Thus Codex work can also adopt a braoder and holistic approach whereby in one standard, reference to appropriate relevant standards should be made.</p>	
<p>New Zealand appreciates the opportunity to comment on CL 2023/65/OCS-EXEC the 'Request for comments on the development of the Codex Strategic Plan 2026-2031 – Part 1 how Codex works as part of the multilateral system on food and trade'.</p> <p>New Zealand has the following comments in response:</p> <p>New Zealand considers Codex has an important role to play through the development of international standards and guidelines that address and deal with any potential food safety and/or trade issues arising from the implementation of policies related to broader global goals around sustainability, one health, food security and environmental protection.</p> <p>Codex, as the relevant international standards body for food safety and fair trade is well placed to provide the enabling environment through standards and guidelines that address any food safety and trade issues while supporting the uptake and implementation of policies and programmes to address the broader imperatives around sustainability, one health, food security and environmental protection. The work of Codex is all the more important in the context of the growing international food trade and the need to ensure foods traded across borders are safe and not subjected to unjustified barriers to trade. Codex standards and guidelines will also be important to minimise food loss and wastage arising from rejection of food at the border of food that might be otherwise safe for human consumption.</p> <p>One of the strategic goals of Codex is to address current and emerging issues in a timely manner. As members will be aware there are significant global challenges arising from climate change, environmental pressures and food systems transformation to feed an ever growing population in a sustainable manner. It is against this background that there are growing initiatives in different parts of the world to address these global challenges.</p> <p>New Zealand considers it is important to highlight the positive role of the multilateral trading system in addressing the global goals around</p>	<p>New Zealand</p>

sustainability, one health, food security and environmental protection.

Any new approaches must be on the basis of risk- and science-based decision-making. Codex must be cognisant of avoiding unduly prescriptive measures and compliance costs in implementing sustainability measures and avoiding policies that undermine global food security.

We see Codex has a role in strengthening internationally recognised best practice for making transparent, evidence-based claims about the sustainability of agricultural production.

New Zealand supports promoting practices and policies that assist agricultural production to mitigate and adapt to climate change i.e. fast tracking the development of MRLs for inhibitors in Codex (on the proviso that these are determined safe). We also support the important role Codex has in considering new foods and production systems (NFPS) many of which are developed to address the broader global goals around sustainability, one health, food security and environmental protection.

Codex could also consider exploring why countries are not harmonising with Codex standards. This could include review the list of Codex standards which have a major trade impact and using the data to inform future standards.

Codex, as the pre-eminent global body for food standards for health protection and trade has a major role to play through the development of appropriate international standards that assure the safety of food while minimising technical barriers to trade.

Operating within its mandate, Codex can, and does already support the broader global goals around sustainability, one health, food security and environmental protection through the development of Codex standards.

In addition to the examples outlined further examples of where Codex standards or guidance already supports these broader global goals include the following (noting some are in development):

- Current standards and guidelines to ensure consumers are informed of and not misled regarding the true nature of foods and have the information required to make safe and healthy food choices;
- Many new foods are emerging to help fulfil the sustainable development goals (SDGs). As such, CCFL is exploring the current and potential use of sustainability claims on food labels and whether there is any role for CCFL in providing global guidance in this area including whether such labelling and claims are within the mandate of CCFL;
- Initiatives in Codex Committees to facilitate implementation of various approaches to dealing with environmental issues related to pastoral agriculture and enable members to confidently promote use of substances such as environmental inhibitors;
- CCNFSDU consideration of nutrition issues, for example, protein quality of different food sources – including both plant and animal sources;
- CCFL work such as front-of-pack nutrition labelling and nutrition information panels and nutrient reference values which provide information to the consumer on the nutritional quality of individual products in the context of a healthy diet.

The extent to which member countries are propelled to harmonise with Codex standards lies strongly in the strength of the World Trade Organization (WTO) framework. WTO is first and foremost a set of legal agreements that affect trade. Most WTO Members' standards and guidance are either tied into classic SPS measures (measures applied to protect animal, plant or human life or health from pests, diseases,

additives, contaminants, or toxins) or TBT measures (measures that specify mandatory product characteristics or their related process and production methods, or that relate to terminology, symbols, packaging, marking or labelling requirements as they apply to a product, process or production method).

The WTO framework may not cover all measures that apply to food and food products in relation to the global challenges of sustainability, one health, food security and environmental protection. Codex could usefully either undertake a work programme to determine if there are trade measures that are not captured by the WTO's current Agreements or encourage the WTO to do this. If gaps are identified, Codex and the wider membership could encourage the WTO to consider rectifying. For example the Committee on Trade and Environment (CTE) is the WTO's multilateral forum for climate change/sustainability discussions and policy development where they concern trade. It has limitations however that other committees like the TBT and SPS Committees do not share, including the lack of enforceable rules as a basis for robust 'specific trade concern' procedures or questions and answers. This means it is quite a different and weaker kind of forum to the TBT and SPS Committees.

Codex could also further support these global goals by appropriately recognising that trade is, and must continue to be, part of the solution to tackling the goals of sustainability, one health, food security and environmental protection through the development of Codex standards and guidance within its mandate. In doing so Codex needs to be cognisant of members rights, obligations and undertakings in the WTO, and other multilateral, regional and bilateral agreements and arrangements regarding sustainable and inclusive trade.

In considering how Codex could support the broader global goals around sustainability, one health, food security and environmental protection we are of the view that Codex could have a useful role in developing high level principles or concepts around the implementation of Codex standards and guidance and how they relate to the specific WTO measures.

While standards and guidance may perhaps provide for improved consumer choice and clarity at the retail level of what the meaning of any labelled claim represents relative to one of the core "new" societal imperatives, they should also recognise that the inherent international diversity of food systems means that we cannot use the guise of harmonisation to impose one group of country's values or solutions to its interpretation of problems on the others. Similarly, any harmonisation effort must not be used to exclude or penalise those products without such claims or with different claims.

We therefore propose Codex give thought to the following high level trade concepts for consideration in the development of relevant Codex standards and guidance:

- There is no one size that fits all;
- Any standard should ideally not have the effect of unnecessarily restricting trade (the principle of applying the least trade restrictive measure available); and
- Any approach needs to be cognisant of and appropriately differentiate the role of governments versus the role of commerce (especially with respect to private standards).

In the global acceleration to the transition to sustainable agriculture and food systems this must be done in a manner which facilitates rather than restricts trade and investment, including through promotion of shared principles.

New Zealand proposes that the consideration of Codex work under the broader global goal of sustainability could be enhanced with

introduction of the following trade principles to support inclusive decisions in Codex.

- Furthering sustainable agriculture and associated public investment;
- Promoting practices and policies that assist agricultural production to mitigate and adapt to climate change;
- Highlighting the positive role of the multilateral trading system;
- Basing approaches in risk- and science-based decision-making;
- Avoiding unduly prescriptive measures and compliance costs in implementing sustainability measures;
- Avoiding policies that undermine global food security; and
- Strengthening internationally recognised best practice for making transparent, evidence-based claims about the sustainability of agricultural production.

Q1 Given the role agrifood plays in the global goals around sustainability, one health, food security and environmental protection (including transition to net zero emission economies) we are of the view that Codex should appropriately recognise the growing importance of environmental inhibitors to address challenges arising from climate change, and environmental degradation and facilitate the uptake and implementation of sustainable food systems.

New Zealand strongly supports a high priority be given to developing Codex MRL standards that facilitate the use of environmental inhibitors through the following committees: CCCF, CCPR, CCRVDF given the potential for significant global benefits both in terms food security (given the significant protein benefits) and environmental benefits (to achieving agricultural emissions targets).

We would like to see appropriate recognition given to the important role of trade, and therefore Codex standards and guidance in addressing the global food security, nutrition and sustainable agriculture challenges. As is evidenced by FAO international agri-food trade can help balance food deficits and surpluses across countries, improve availability of diverse foods, and contribute to price stability.

Q2 The benefits from collaboration (as outlined in the Quad One Health Joint Plan of Action) across the multilateral system for trade and food if done well includes:

- would ensure that Codex aligns with its Quadripartite signatory parent organisations' aims (i.e. WHO and FAO aims) to ensure a cohesive One Health approach;
- would ensure that Codex and WOAHA stay aligned in those areas where animal health and food safety overlap or interact;
- that Codex's role to set the standards for those areas of food safety and AMR within its remit is recognised;
- may aid recognition of the range of policies that can facilitate the transition to net zero, and to uphold the use of emissions reduction policies that are designed and applied in a manner consistent with international obligations including at the WTO and under the UNFCCC and Paris Agreement.
- may provide scientific and technical assistance with the aim of enhancing the participation of countries in the standard setting work of the Codex Alimentarius Commission and relevant work of the WOAHA and facilitate its implementation through a multisectoral, coordinated approach.
- a more comprehensive assessment of human health challenges including food and water security and safety (allowing for more sustainable policy development with lasting results);
- may help to avoid working in silos, thus more fully informed of possible flow-on effects of policies in these other areas resulting in more integrated policies;

<ul style="list-style-type: none"> • may provide joint decision processes for sustainable and holistic decisions; • may help to avoid duplication of efforts in these organisations; and • may allow for greater sharing of knowledge and future planning. 	
<p>Q1 The key benefits to Codex and its Members from such collaboration across the multilateral system for trade and food are:</p> <ul style="list-style-type: none"> • Tackles anti-microbial resistance (AMR) • Codex standards based on a broader scientific basis, since the One Health approach formulates clearly both the need for, and the benefit of cross-sectoral collaboration • Having the situation in perspective and identifying future Codex priorities in a sufficient time so that appropriate action can be taken well before any emergency occurs <p>Q2 To support global goals around sustainability, one health, food security and environmental protection CAC should:</p> <ul style="list-style-type: none"> • Continue to provide its Members with science-based standards that can help countries to meet number of the SDG's • Develop standards that optimize consumer health, while taking into consideration the health and welfare of animals and put emphasis on protection of the environment <p>The continuous increasing of the human population worldwide has posed a serious concern on achieving the goal of food security in the developing world. On the other side, massive food production in the developed countries leads to a great amount of food loss and food waste that pose an additional environmental concern.</p> <p>In this regard, while ensuring their broader goals on sustainability and One health, Codex standards could additionally include provisions addressing the management of food waste in terms of reducing the effect on the environment and, if adequate, using of excess food for emergency use.</p>	<p>North Macedonia</p>
<p>Q1 Codex with a mandate to protect consumer health should include in its new strategic plan its role in finding global approaches to global challenges when setting international stds for food safety and quality. This would especially be related to the One Health approach, cross sectoral collaboration and a broader scientific approach in risk assessment.</p> <p>We would also like to support the following:</p> <ul style="list-style-type: none"> • Codex as part of the UN system and referenced standard setter for the WTO needs to take effective and accountable decisions relating to food across a range of increasingly urgent global challenges. • CAC Strategic Plan 2020-2025 recognizes Codex standards can assist members in implementation efforts to achieve the SDGs by 2030 (highlighting SDG2, 3, 12 and 17), but Codex has not put in place coherent approaches for discussing and prioritizing new work that is relevant and conducive to the SDGs and the transition towards more sustainable food systems. • Codex currently does also not consider to what extent the implementation of its standards can have a negative impacts on the achievement of SDGs and the goal food systems transformation. • To support global goals around sustainability, one health, food security and environmental protection CAC should strive to <ul style="list-style-type: none"> o prioritize such normative work that optimizes consumer health without compromising the health and wellbeing of animals or ecosystems. o eliminate or minimise negative impacts on SDGs and the goal of sustainable food systems transformation that can derive from the implementation of Codex standards by consulting and coordinating its standard development work with appropriate organizations. <p>Q2 Codex with a mandate to protect consumer health should include in its new strategic plan its role in finding global approaches to global challenges when setting international stds for food safety and quality. Especially related to the One Health approach, cross sectoral collaboration and a broader scientific approach in the risk assessment.</p>	<p>Norway</p>

<p>We would also like to support the following:</p> <ul style="list-style-type: none"> • We support the One Health Joint Plan of Action (OHJPA) and agree with its relevance for Codex work. • We note that part of the purpose of Codex is to promote coordination of all food standards work undertaken by IGOs and NGOs and to determine priorities and initiating and guiding the preparation of draft standards through and with the aid of appropriate organizations (Article 1 of the Statutes of the Codex Alimentarius Commission). • The key benefits we see from enhancing “One Health collaboration” are: <ul style="list-style-type: none"> o a broader scientific basis for international food safety risk management decisions o Codex standards that help regulators take more preventive actions on the prevention and reduction of long term food safety risks o Codex standards that do not contradict other international SPS risk management recommendations or normative efforts by other international organization dealing with One Health issues o Codex standards that do not duplicate normative efforts of other international “One Health” organizations (e.g. members of the Quadripartite) 	
<p>Q1 Paraguay considera que el Codex Alimentarius debe centrarse en sus objetivos los cuales son la protección de la salud de los consumidores y asegurar las prácticas leales en el comercio de alimentos, consideramos que existen organizaciones específicas para abordar temas que están fuera del mandato del Codex, creemos que 60 años del Codex de alguna manera demuestra sostenibilidad.</p> <p>Q2 Creemos que UNA SOLA SALUD ayudara a todos los países a coordinar mejor sus acciones con relación a la salud de la humana, la salud animal y la sanidad vegetal, Paraguay considera que el Codex puede complementar con estas acciones bajo los mandatos del mismo.</p>	Paraguay
<p>Q1 Las prioridades del Codex Alimentarius deberían ser las establecidas en sus principios generales que estarían relacionadas a: Proteger la salud del consumidor y asegurar la aplicación de prácticas equitativas en el comercio de alimentos. Consideramos que en las reuniones del Codex Alimentarius no se deberían abordar otros temas como salud ambiental, sanidad animal, entre otros, que no son sus prioridades porque se alteraría el fin de la Comisión.</p> <p>Q2 La Asociación cuatripartita (la Organización de las Naciones Unidas para la Alimentación y la Agricultura, el Programa de las Naciones Unidas para el Medio Ambiente, la Organización Mundial de Sanidad Animal y la Organización Mundial de la Salud) , al elaborar un Plan de acción apoyado en la evaluación, gestión y comunicación de riesgos en materia de inocuidad debería comunicar a la Comisión del Codex Alimentarius los riesgos identificados para analizar si es necesario establecer controles, hacer un seguimiento a esos controles y realizar acciones de mejora, siempre que los riesgos identificados estén alineados en el marco de los objetivos del Codex.</p>	Peru
<p>Q1 1. Focusing on contemporary challenges in food safety and quality, and human nutrition. For example, we can create criteria to regulate novel foods and manufacturing technologies.</p> <p>2. Drawing up a strategy to regulate healthy food and setting up international standards to enhance health and nutritional values for foods and feeds.</p> <p>3. Setting up international standards in alignment with the modern biotechnologies used in food production.</p> <p>4. Employing a comprehensive standard-setting approach, taking into account sustainability objectives, one health approach, food security, environment protection and promotion of innovation.</p>	Saudi Arabia

<p>5.Setting up standards for environment-friendly waste treatment of agricultural and food industry byproducts, specifically those containing microbial contaminants with a view to avoid widespread of pathogenic organisms in the environment.</p> <p>6.Setting up standards which increase the abundant supply of safer food products and promote sustainable agricultural practices.</p> <p>Q2 1.Using One Health Joint Plan of Action as a platform to share experiences and resources among partaking international organizations (FAO· WHO· WOA·H· UNEP), reduce duplication of efforts, improve communication and coordination, and drive global impact by the implementation of more effective and comprehensive standards for food products and novel food and risk assessments.</p> <p>2.Learning from the experience of some members in food and feed biotechnologies and their relevant risk assessment studies, in order to set up comprehensive international standards to regulate the use of modern biotechnologies (such as plant-based meat, and insect-based foods, especially with the growing use of modern manufacturing technologies and novel food production).</p> <p>3.Harmonizing risk management at global level to support fair trade practices, and decrease concerns raised by members.</p> <p>4.Developing a risk assessment strategy for the use of biotechnology in food production.</p> <p>5.Developing a food safety information exchange framework for members to optimize risk assessment operations and serve the objectives of one health approach.</p> <p>6.Designing systems, guidelines and regulations for the One Health Approach throughout the stages of food production, to facilitate food safety risk assessments and reduce the resulting financial burden.</p> <p>7.Developing strategies for effective risk communication and information exchange among members</p>	
<p>Q1 In Singapore's view, Codex has already contributed to the global goals around Food Security, Sustainability, Environmental Protection and One-Health, through its existing efforts, such as discussions on New Food Sources and Production Systems (NFPS), considering new work on issues driven by sustainability concerns, as well as on per- and polyfluoroalkyl substances (PFAS). We would like to provide suggestions on how Codex could continue to play a role in advancing these global goals in the future.</p> <p>New Food Sources and Production Systems -- Many food business operators have been developing, or have already introduced innovative food products, in response to the pressing global concerns related to sustainability, environmental protection (including animal welfare), and food security. Some examples include cultivated meat, foods derived from precision or biomass fermentation, and insects. The FAO has also published 2 reports, "Food Safety Aspects of Cell-based Food" and "Edible Insects: Future prospects for food and feed security" in response to the development of these food innovations.</p> <p>Singapore believes that food innovations could contribute positively to food security. However, this would only be possible if the food products arising from these innovations have been assessed to be safe. Yet, international standards, guidelines and codes of practice for the assurance of food safety for such food products are currently lacking. Singapore has therefore been actively contributing to discussions with our international counterparts on this issue. The Singapore Food Agency (SFA) has been hosting the Roundtable for Novel Food Regulations since 2019. This provides a platform for regulators, industry players and researchers to raise awareness of novel food production</p>	<p>Singapore</p>

technologies, discuss the challenges in safety assessment and explore opportunities to advance the regulatory agenda while encouraging food innovations. Singapore was invited by FAO to collaborate on developing a case study on cell-based foods, and eventually co-hosted an international consultation on cell-based foods together with the FAO in November 2022, and contributed our experiences in regulating cell-based food as part of the FAO publication “Food Safety Aspects of Cell-based Food”.

At the Codex platform, Singapore has responded to calls for Codex Members and Observers to share their views on NFPS. At CAC45, Singapore shared in CRD34 rev. that we have been looking at possible solutions offered by NFPS in a proactive manner. We have invested over S\$300 million to develop food innovations through the Singapore Food Story (SFS) R&D Programme and have been actively contributing to efforts internationally to trigger discussions on NFPS. In response to CL 2023/31/OCS-CAC, we have also proposed 4 NFPS-related topics which in our view, would be better addressed through a dedicated, intergovernmental task force for NFPS:

- (i) Risk analysis of food products derived from NFPS – This topic aims to develop risk analysis criteria for NFPS, including those not previously considered in food production.
- (ii) Risk prioritization for food products derived from NFPS – When Codex establishes work priorities for NFPS, the discussion would need to span across multiple general subjects. In addition, work on NFPS would need to begin urgently as related discussions have already emerged on various platforms within and outside of Codex. For example, CCNFSDU43 called for discussions around the proposed new work on Guidelines, including General Principles, for the Nutritional Composition of foods and beverages made from plant-based and other alternative protein sources, which would potentially cover foods and beverages containing substances derived from NFPS. The establishment of a dedicated Codex mechanism for NFPS, such as a task force, could help ensure that NFPS-related topics are not de-prioritised in relation to other work within the mandates of the individual Codex committees.
- (iii) Harmonisation of terminologies for food products derived from NFPS – As there is no international agreement currently on the terminologies for some of these food products, there could be unnecessary trade barriers and challenges in the provision of NFPS data for risk assessments. There is no apparent Codex commodity committee for commodities within the scope of NFPS.
- (iv) Good practices for the storage, transport and production of foods derived from NFPS – As some forms of NFPS production involve processes and inputs that have not been covered in existing guidelines, standards or codes of practice, it would be useful to establish standardised guidelines to provide clarity to the industry and help national competent authorities to establish clear licensing guidelines.

Clear guidance from Codex could catalyse the development of the NFPS sector and provide the food safety assurance needed to ensure food security.

New work driven by sustainability concerns – Noting that water is a dwindling resource worldwide and that not all food producers and processors have unfettered access to safe water sources, the Codex Committee for Food Hygiene (CCFH) recently agreed to seek CAC46’s consideration to adopt guidelines on the safe use and reuse of water in food production and processing. This guidance would help food business operators determine if the water that has been sourced, used, and reused are fit for food production or processing purposes. Besides contributing to food safety assurance, this guidance could potentially help to encourage more food business operators to reuse and recycle water in their operations, thereby contributing to sustainability.

The Codex Committee for Food Labelling (CCFL) has also been considering proposed new work on sustainability-related labelling claims. These discussions arose from increasing consumer interest in the sustainability of food products and the observation that there has been a growing number of sustainability claims on food labels that might not fulfil the requirements of the General Guidelines on Claims (CXG 1-1979). Singapore views that prioritizing this work could not only help to protect consumers against misleading sustainability-related labelling claims, but also enable Codex to provide clear guidance for food business operators that are interested to incorporate practices in food

<p>production and processing that contribute to sustainability and environmental protection.</p> <p>In addition, the Codex Committee for Pesticide Residues (CCPR) has agreed to seek CAC46's approval on new work to develop guidance for monitoring the purity and stability of reference material of multi-class pesticides during prolonged storage. This was arising from discussions that pesticide reference materials could be used for the analyses of pesticide residues in food even if they have expired, as long as the reference material remains sufficiently pure, and the results are supported by robust monitoring data on the stability of the pesticide residue. The elaboration of these guidelines may lead to less wastage of pesticide reference materials.</p> <p>New work on PFAS, and potential new work on new and emerging food safety hazards – Singapore notes that Codex has been considering developing standards for per- and polyfluoroalkyl substances (PFAS). Other than being a food safety hazard, PFAS is also an environmental contaminant that breaks down very slowly and persists in the environment for a long time. The development of Codex standards for PFAS could potentially lead to a higher level of awareness of PFAS. This may encourage factories producing PFAS-containing products to adopt measures to reduce the release of PFAS into the environment, thereby lessening its environmental impact.</p> <p>Meanwhile, climate change could lead to more new and emerging hazards in the future. As highlighted in the FAO report “Climate Change: Unpacking the Burden on Food Safety”, climate change is expected to alter the occurrences of existing foodborne microbiological and chemical hazards and events and change the virulence patterns of microbiological hazards. Examples include an expected increase in heavy metal and pesticide residue contamination in food and/or water, toxin contamination due to algal blooms, increased disease burden of foodborne pathogens, and the spread of microplastic pollution. These developments threaten not just food safety and security, but also lead to faster transmission of diseases and reduced water quality. Issues, such as those related to disease-causing pathogens, would need to be addressed through a One-Health approach, recognising that the health of humans, animals, plants and the environment are interconnected. Codex should see how it could support the work of the One-Health Joint Plan of Action (developed by the Quadripartite Organisations – FAO, WHO, WOA and UNEP), by prioritizing work on the new and emerging hazards.</p>	
<p>Q2 The Quadripartite One Health Joint Plan of Action (OH JPA) has recommended 6 action tracks to address key health challenges at the human-animal-plant-environment interface. Specifically, the 4th action track aims to strengthen the assessment, management and communication of food safety risks.</p> <p>Under this action track, Codex Members would be able to evaluate and implement improvements to key components in their national food control systems, and also be provided with capacity building opportunities to undertake this work. This would help to reduce the risks associated with unsafe food around the world.</p> <p>Codex Members would benefit from having guidance on how to use data and information on food systems, as well as to incorporate scientific evidence and risk assessment where possible in developing policy and legislation. In turn, Codex Members would be able to make more informed risk management decisions on food safety and reprioritize resources accordingly to strengthen their national food control systems.</p> <p>Collaborations under the OH JPA could enable Codex Members to better adopt the One-Health approach in the surveillance, detection and monitoring of foodborne diseases and food contamination. New insights on the incidence and burden of foodborne diseases could be uncovered through a better understanding of how chemical, microbiological and physical sources of contamination could eventually lead to an</p>	<p>Singapore</p>

<p>increased disease burden on the population. A better disease surveillance system would allow Codex Members to detect, prevent and respond to food-related public health issues in a more effective and integrated manner.</p> <p>The promotion of collaborations across the multilateral system for trade and food could benefit Codex Members through tapping on the enhanced expertise and shared resources among the different stakeholders to develop comprehensive and effective policies that recognize the interconnectivity between human, animal, plant and environmental health.</p>	
<p>Q1 Türkiye support the right of all countries in the world to access food. It is sure that this will be achieved through sustainable food systems. Food standards lead the creation of sustainable food systems. Importance should be given to preparing food standards with the pluralistic participation of all Codex members, prioritizing food safety, without prioritizing the commercial interests of countries.</p> <p>As it is well-known, the multi-factor decision-making process was adopted by the Codex Alimentarius Commission (CAC) and the food safety risk analysis paradigm upholds risk management as the component in which scientific information on health risks and other factors (such as economic, social, cultural and ethical) need to be considered and weighed in by choosing the preferred risk management decision (FAO Guidance, 2017. https://www.fao.org/3/i8240en/I8240EN.pdf). All countries are concerned with the need to establish clear priorities in order to make the best use of finite resources, and to ensure that decisions to ensure food safety do not negatively affect other dimensions essential for development, e.g. trade, economics, food security, tourism, social well-being. We expect that Codex Standards would take into consideration this approach without causing food loss & waste and without prejudice food security.</p> <p>Q2 We support the One Health Joint Action Plan (OHJPA) and agree that it is very relevant to the Codex work.</p>	<p>Türkiye</p>
<p>Emerging Risks: Codex should proactively address emerging risks, such as novel food sources, production systems, and technological advancements, to ensure that food standards remain relevant and responsive to changing circumstances.</p> <p>Capacity Building: Codex should invest in capacity-building efforts to assist member countries, particularly developing nations, in implementing and complying with Codex standards, thereby improving food safety, quality, and sustainability on a global scale.</p> <p>Research and Data: Codex should prioritize research and data collection and sharing between member countries on emerging food safety and quality issues, allowing for evidence-based decision-making and the development of effective standards.</p> <p>In conclusion, Codex can play a pivotal role in advancing global goals related to sustainability, One Health, food security, and environmental protection by developing international food standards that address potential issues for consumer health protection and fair-trade practices. Priority areas include emerging risks and capacity building through research and capacity building.</p> <p>Q2 United Arab Emirates would like to mention that the Collaboration across the multilateral system for trade and food, as championed by the Quadripartite One Health Joint Plan of Action, offers numerous benefits to Codex and its members. Among these benefits:</p> <ul style="list-style-type: none"> -Enhanced Food Safety: Comprehensive Risk Assessment: Multinational, multi-sector, multidisciplinary collaboration allows for comprehensive risk assessment. By bringing together experts from various fields, including public health, agriculture, and veterinary medicine, Codex can better evaluate food safety risks from multiple angles, leading to more effective risk management strategies. -Early Detection and Response: Collaboration enables early detection of emerging food safety threats, such as zoonotic diseases, and facilitates coordinated responses to mitigate these threats. This proactive approach enhances food safety worldwide. Codex can collaborate in this efforts through issuing texts (standards, guidelines, code of practices) related to, for example, commodity inspection and sampling. -Strengthened Global Partnerships: Knowledge Sharing: Collaboration fosters knowledge sharing among international organizations and agencies, promoting a collective understanding of food safety challenges and solutions. This sharing of expertise strengthens Codex's ability to develop and update standards that reflect the latest scientific knowledge. -Capacity Building: Collaborative efforts can support capacity-building initiatives, particularly in developing countries, to enhance their ability 	<p>United Arab Emirates</p>

<p>to meet Codex standards. This builds a more robust global food safety infrastructure.</p> <p>-Effective Risk Communication: including Unified Risk Communication through the collaboration across the multilateral system facilitates unified risk communication. Moreover, consistent and clear communication about food safety risks and standards may enhance consumer confidence and trust in the safety of the global food supply. Adding to that, Multinational, multi-sector collaboration enables timely responses to food safety crises or emergencies, ensuring rapid containment and mitigation of risks.</p> <p>-Streamlined Regulatory Harmonization: Collaboration supports the harmonization of food safety and quality standards across countries and regions. This harmonization simplifies international trade and reduces trade barriers, benefiting both producers and consumers.</p> <p>-Addressing Complex Challenges: Many food safety challenges today are complex and multifaceted. Collaboration allows for a holistic approach that considers the interplay of human, animal, and environmental health, which is crucial for addressing issues like antimicrobial resistance and zoonotic diseases.</p> <p>In conclusion, collaboration across the multilateral system for trade and food, as advocated by the Quadripartite One Health Joint Plan of Action, offers Codex and its members numerous benefits, including enhanced food safety, strengthened partnerships, effective risk communication, regulatory harmonization, and the ability to address complex global challenges. This collaborative approach aligns with Codex's mission to protect consumer health and ensure fair trade practices, reinforcing its role as a central player in international food safety and trade.</p>	
<p>Q1 • The UK notes that Codex's criteria for the establishment of work priorities includes a requirement to consider the work of other international bodies. For commodities this extends to a requirement for an analysis of areas of potential complementarities, gaps, duplication, or conflict. In our view this is good practice and should be applied more widely to ensure coherence with broader global goals and objectives, including those set down in the Sustainable Development Goals (SDGs).</p> <ul style="list-style-type: none"> • Sustainability goals feature strongly in SDGs 2, 12 and 17, all of which are relevant to Codex. The draft blueprint on the future of Codex articulates how Codex can support transformation towards more sustainable food systems through the use and implementation of Codex texts and application of risk management at national and regional level. Codex should seek to offer support for initiatives aimed at advancing sustainability interests at a global, regional and national level and be consistent with the requirement to analyse potential conflicts with the work of other international bodies working to transform food systems. • One Health is not new to Codex and was acknowledged by TFAMR as an important component of integrated surveillance. One Health recognises the interconnectedness of human, animal and plant health and requires a larger pool of interdisciplinary expertise to assess risks which may go beyond food safety and be systemic in nature. It has particular relevance to the transformation of food systems and is one of the guiding principles aimed at preventing a future pandemic. Codex should therefore consider the extent to which the Joint FAO/WHO expert bodies might benefit from wider interdisciplinary expertise. • Food safety and nutrition are pre-requisites for food security. Codex standards cover both aspects so promoting the use and implementation of Codex texts by national governments should remain a priority. Codex could also look at how barriers to implementation might be addressed, for example through additional practical guidance and/or toolkits. However, food security is more complex and a multifaceted goal that requires a high level of joined up and coordinated action so that all the key actors, Codex included, are pulling in the same direction and working towards the same goals. • Codex should not underestimate the pace of change needed to transform the food system including the role that innovation and technology will play assisting any transformation, for example precision breeding/gene editing, the use of environmental inhibitors and 	<p>United Kingdom</p>

<p>development of new foods and protein sources. A priority for Codex is to be able to respond to the many and varied innovations and use of emerging technologies in a timely manner. This means ensuring that there is sufficient capacity and capability in the system to respond, including the provision of independent scientific advice from WHO/FAO. A further challenge will be the cross-cutting nature of some of the emerging technologies, as seen with NFPS, that requires input from different subsidiary bodies and multidisciplinary expert scientific advice.</p> <ul style="list-style-type: none"> • A tool used by many regulators, impact assessment, should be considered by Codex, for use on an exceptional basis only, when analysis suggests there might be potential conflicts between proposed new work and the broader global goals of Codex's parent or sister UN bodies. When triggered members/observers could be invited to provide evidence/data for consideration by a wider (multidisciplinary) group of experts. <p>Q2 • The UK supports the One Health Joint Plan of Action (OHJPA) and supports the introduction of a more formal mechanism (MOU?) to foster collaboration between the Quadripartite and Codex to take advantage of the wealth of experience and interdisciplinary expertise within the group which can help inform future Codex work and priorities.</p> <ul style="list-style-type: none"> • As noted in our earlier comments, it is already a requirement for Codex to work with other international bodies to ensure complementarity and help avoid duplication and conflicts. 	
<p>Q1 En relación a la primer pregunta del párrafo:</p> <p>La seguridad alimentaria se refiere a la disponibilidad, el acceso y el consumo de alimentos en cantidades suficientes y de calidad adecuada para satisfacer las necesidades nutricionales de la población. Implica garantizar que todas las personas tengan acceso físico, económico y social a los alimentos necesarios para una vida sana y activa. La sustentabilidad alimentaria se refiere a la capacidad de producir alimentos de manera suficientemente eficiente para alimentar a la población humana, con un impacto neutral en el medio ambiente. La relación entre ambos conceptos es que la seguridad alimentaria depende de la sustentabilidad alimentaria, es decir, que para garantizar el acceso a los alimentos se necesita una producción sostenible que no agote los recursos naturales ni degrade el ecosistema.</p> <p>La vía más efectiva del logro de la sustentabilidad y la seguridad alimentaria es la liberalización del comercio mundial de alimentos, y es allí donde el Codex juega un papel crucial. Las medidas de protección y apoyo diseñadas por razones ambientales, incluyendo aquellas que buscan privilegiar la producción local de alimentos de países que no tienen ventajas competitivas, tienen un impacto negativo y distorsivo en el comercio internacional. En ese sentido el CODEX juega un papel crucial al promover estándares que eviten la introducción de barreras técnicas al comercio internacional de alimentos. El CODEX, por lo tanto, debe priorizar la profundización de su rol en la liberalización mundial del comercio de alimentos combatiendo la introducción de trabajas carentes de fundamento científico.</p> <p>En lo que refiere a la protección del medio ambiente la liberalización del comercio también tiene un impacto relevante. Cuando los alimentos son producidos en donde las condiciones naturales son óptimas se evita el uso excesivo de energía e insumos para compensar la ausencia de esas condiciones. Existen otros casos en que el CODEX contribuye en la protección del medio ambiente en base al ejercicio de sus cometidos, al establecer LMR para plaguicidas; el uso de plaguicidas es muy importante en el control de plagas, pero cuando son utilizados en formas y cantidades inadecuadas, los plaguicidas pueden llegar a causar daños tanto a la producción de interés, como al ambiente, a los trabajadores y consumidores. Las intervenciones del Codex en esta materia deben ser consistentes con sus objetivos, pero también deben ser una vía eficaz de lograr el propósito perseguido. Debe evitarse el riesgo en incurrir en temáticas ajenas a las capacidades y cometidos del Codex y donde existen riesgos elevados que intereses económicos, disimulados bajo la apariencia de preocupaciones por el medio ambiente, introduzcan una agenda de barreras al comercio.</p>	<p>Uruguay</p>

En materia de salud, el CODEX contribuye desde sus objetivos específicos, que son la inocuidad de los alimentos. La solidez y la credibilidad de sus recomendaciones se basan en su fundamento científico. Hay muchos países, especialmente aquellos en vía de desarrollo, que dependen de la producción normativa del CODEX para la elaboración de sus propias legislaciones. En ese sentido el CODEX debe priorizar dentro de su agenda de temas aquellos que tengan mayor impacto en la lucha en esos países contra enfermedades vinculadas a los alimentos.

El Codex debe evitar la tentación de incurrir en áreas que, si bien vinculadas a los alimentos, están más allá de sus cometidos. En particular, una de esas áreas es la vinculada a los hábitos alimenticios de las personas. Las experiencias que se han realizado en otros ámbitos en el sentido de incidir en el comportamiento de las personas ha demostrado enormes complejidades. El ser eficaz en esa tarea requiere habilidades que son distintas a las que han caracterizado al Codex, estando más vinculadas al estudio de la psicología individual y colectiva y al cambio cultural. El rol del Codex en este sentido consiste en seguir suministrando información clara y objetiva sobre la inocuidad de los alimentos.

En relación a las prioridades particulares del Codex, segunda pregunta del párrafo:

En la línea de lo expresado en el punto anterior, las prioridades para el Codex deberían ser: A Áreas donde los requerimientos técnicos para la importación de alimentos se han transformado en barreras al libre comercio, B. Temas que son relevantes para el combate de enfermedades transmitidas por los alimentos en países en vías de desarrollo.

Q2 Las fortalezas de Codex son claras y bien conocidas. El objetivo del plan "Una sola salud" no implica que cada organismo incursione en los cometidos de otras organizaciones, sino que las organizaciones involucradas hagan un mayor esfuerzo para coordinar sus actividades, de forma de potenciar su eficacia. En ese sentido el Codex debe tener la capacidad de reaccionar rápidamente ante los requerimientos de información que le sean formulados por aquellos organismos que la requieran como insumo para sus propias agendas de actividad.

Q1 As noted in the quoted sentence, Codex supports these broader goals by developing science-based food safety and quality standards, guidelines and recommendations that protect consumer health and promote fair trade practices.

For example, Codex work on foodborne antimicrobial resistance (AMR) contributes to the broader multisectoral effort to prevent AMR. The Codex Committee on Contaminants in Food developed guidelines for rapid risk analysis for contaminants with no regulatory level; the scope includes "Chemicals used to mitigate specific environmental, sustainability and climate change issues, (e.g., nitrification and urease inhibitors), which have not been anticipated to be present in food," Codes of Practice to prevent contamination and promote safe storage and handling practices in order to ensure food safety also prevent food waste and contribute to greater food security.

Current priority work in this area includes ongoing work in the Codex Committee on Food Hygiene on the safe use and re-use of water in food production. Future work to ensure the safety of residues in food resulting from the use of substances intended to control pests (pest control needs may change as a result of climate change), reduce agricultural emissions or achieve other sustainability goals may also be considered within the terms of reference of standing Codex committees such as the Codex Committee on Pesticide Residues and the Codex Committee on Residues of Veterinary Drugs in Foods. The United States is also exploring the possibility of work to address food safety issues that may arise from the use of recycled packaging materials.

United States of America

The United States also looks forward to participating in future discussions and providing more specific comments and suggestions as the new plan is developed.

Q2 The Joint Plan of Action includes many recommendations aimed at assisting countries in strengthening their food safety/food control systems, including assistance to enhance participation in Codex and the relevant work of WOA. It is important to keep in mind that some considerations are best addressed at the national or regional level, for example, environmental and occupational health considerations in determining good agricultural practices are taken into account at the national level, as acknowledged in the Codex Procedural Manual.

It is also important for Codex to be aware of the work of other organizations that may have implications for Codex work. This information can be provided through the opportunity for regular updates from FAO, WHO, WOA, UNEP, and other organizations at Codex sessions. In addition, there is value in dialogue among the Secretariats of these organizations to help identify any potential gaps or inconsistencies in the standards, guidelines, and recommendations that are developed. Some aspects of One Health are outside of the scope of Codex, and Codex does not have the expertise to address them. When it comes to risk assessment and risk management of food safety risks, however, Codex should continue to have the lead, supported by the independent, international expert assessments provided through the joint FAO/WHO scientific advice program.

Q1 With respect to global sustainability goals for safe food production and fair trade, Codex has a dedicated responsibility. With its mandate, Codex contributes significantly to sustainable and resilient food supply chains. By providing globally harmonized trading standards and guidelines Codex enables market access, particularly for the developing world. This is of particular importance since Codex standards are recognized under WTO's SPS agreement as a tool to overcome potential or real trade disputes.

Codex standards are based on well-defined and detailed guidance, for example for pesticide maximum residue limits, human toxicology and residue chemistry. The protection of biodiversity, agricultural land use, soil protection and/or other aspects of climate change, as well as social and economic sustainability aspects, are connected to sustainable food supply in a much wider context. As such, these factors are certainly of importance also for the input providers as part of the food chain sector. The responsibility for these topics within the UN is with other programs and does not fall under the joint responsibility of FAO or the WHO. However, Codex should be consulted and actively contribute to those discussions within the UN system, to ensure Codex can fulfil its mandate for safe food, fair trade, and leaving no one behind.

One of the most substantial contributions that Codex members can make to advance sustainability interests within Codex is to provide increased and sustainable funding to the Codex secretariat and its scientific advise bodies. As far as CropLife International has observed funding to Codex, Codex has operated with the same budget for the past 10 or more years, while the demand of Codex standards and guidance has increased. In CropLife International's view, the biggest contribution to sustainability is Codex being resourced properly. Setting and securing the adoption of science-based standards as widely as possible enables sustainable development in the agri-food sector which is important for developing economies to access higher-value markets, promoting resilient supply chains. This would allow Codex to meet its ever-increasing demand for new Codex standards, and have the capacity to review existing standards on a periodic basis to bring them up to the latest scientific developments.

Codex certainly can contribute to sustainability by maintaining its core focus on food safety and trade and those standards that enable development.

CropLife International .

Last but not least, we would like to bring the following document to the attention of the Codex secretariat, Codex members and observers that sets out ten considerations to help Codex and its Members meet the demand for sustainable food supply, and with a view to preserve and build on the achievements Codex Alimentarius has made over the past 60 years. We trust these insights will help guide the drafting of the next Codex Strategy (https://agrifood.net/wp-content/uploads/2023/04/IAFN-Codex-and-Sustainability-in-Food-and-Agricultural-Production_Final.pdf)

Q2 The benefits for Codex and its Members from such collaboration across the multilateral system for trade and food are, inter alia:

- Promotion of adoption of Codex standards by all its members. as the harmonized global trade reference standard.
- Opportunity to consistently communicate about perceived vs. real food safety risk, contributing to increased knowledge exchange and awareness and ultimately improving people's lives.

We believe that Codex can play an important role in outlining their efforts to address the improvement in international food management through their strategic goals and progress in the implementation on the development of Codex standards and open access to safe food management systems.

ENCA is pleased to contribute to this important discussion on how Codex standards on food safety, quality and nutrition can support the broader goals of sustainability, one health, food security and environmental protection and fully support the comments being submitted by IBFAN

Request for comments on the development of the Codex Strategic Plan 2026-2031 – Part 1 – how Codex works as part of the multilateral system on food and trade CL2023/65/OCSEEXEC <http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en>

As the first step in this programme of engagement, Members and Observers are invited to provide responses to the following questions, which are based on Annex I:

Codex standards, put in place for food safety, quality, and nutrition, may also contribute to other areas. In your view, how could Codex support “the broader global goals around sustainability, one health, food security and environmental protection through the development of international food standards that address any potential issues for consumer health protection or fair trade practices arising from implementation of initiatives to advance sustainability interests”? Where do you see particular priorities for Codex?

The Quadripartite One Health Joint Plan of Action focuses on supporting and expanding capacities in six areas, including the assessment, management and communication of food safety risks. It also promotes multinational, multi-sector, multidisciplinary collaboration. What benefits might there be to Codex and its Members from such collaboration across the multilateral system for trade and food?

ENCA RESPONSE:

ENCA is pleased to contribute to this important discussion on how Codex standards on food safety, quality and nutrition can support the broader goals of sustainability, one health, food security and environmental protection and supports the comments made by IBFAN.

The aim of Codex since its foundation in the early 60s has been to protect the health of consumers and ensure fair practices in the food trade. However, the permissive global trade of countless ultra-processed products, standardized by Codex has sadly, harmed rather than protected the health of humans and the environment . The agri-food industry has used Codex to undermine bio-diverse, traditional food cultures and in

ENCA

many countries the deforestation, mono-cropping, land-grabbing and risky technologies that have had a devastating impact on human and planetary health. Analyses are now showing that UPF consumption is a significant cause of non-communicable diseases and premature death.

Since breastmilk substitutes are global commodities, trade has been a central concern of IBFAN since its inception and IBFAN has necessarily worked to improve trade rules, attending Codex Alimentarius meetings since 1995 when the World Trade Organisation recognised Codex standards as the reference point for dispute settlement mechanism. We see the participation of independent International NGOs as an integral and essential part of Codex that should be recognised and enhanced in the new Strategic Plan.

IBFAN's main focus has been to achieve policy coherence between Codex standards and the recommendations of the World Health Assembly, in particular the International Code and the subsequent relevant WHA Resolutions in order to protect breastfeeding and optimal complementary feeding and ensure the highest attainable standard of health for mothers and children. Breastfeeding is a resilient practice that provides food, care and immune support, protects against malnutrition in all its forms and is a lifeline for babies in all situations, including and especially those in emergency situations. Breastfeeding and complementary feeding with local, culturally appropriate family foods are the world's most sustainable, food secure and environmentally protective means of feeding infants and young children. Breastfeeding is the nurturing relationship of the mother baby dyad and is profoundly affected, displaced and undermined by weak Codex standards and trade rules. As a result of the unsafe feeding exacerbated by harmful and aggressive marketing there are still an estimated 800,000 thousand infants and young child deaths each year, with over 330,000 in the African region alone. Many more suffer from malnutrition or do not reach their full potential.

In order to protect breastfeeding and optimal complementary feeding, it is essential to tackle many cross-cutting broader issues that affect Codex decisions, namely its poor transparency and Conflicts of Interest safeguards and the difficulty of achieving policy coherence between Codex decisions and those made by the UN bodies, and in particular the parent organizations of Codex, WHO and FAO.

The failure of Codex to adequately address these problems has had a profoundly damaging impact on health, the environment and has left mothers and children exposed to the will of marketeers and powerful exporting countries – entities that benefit from unrestricted trade but are never held financially responsible for these harms. All the 'costs' are externalized to resource-poor governments, families, babies and the environment.

IBFAN advocacy has helped bring about partial incorporation of WHA resolutions into most Codex standards and guidelines relating to infant and young child feeding. There remain significant discrepancies and loopholes. The over-arching requirement in the Code of Ethics for International Trade in Food (CAC/RCP 20-1979) that calls on national authorities to 'observe' the International Code and resolutions of the World Health Assembly (WHA) is ignored by far too many governments., ,

Although nearly all Member states endorsed the International Code of Marketing of Breast-milk Substitutes in 1981 and the 20 subsequent, relevant World Health Assembly resolutions that strengthen it, these essential minimum policy requirements are not made fully mandatory in the Codex standards relating to infant and young child feeding products. It is high time that they are.

If there is to be the radical transformation of the global food system Codex working procedures must be improved. Below we provide some suggestions for changes to Codex Priorities, many of which should be included in the Procedural Manual:

1 Decisions must be protected from commercial influence and based on relevant and convincing evidence:

Despite the fact that the Codex Procedural Manual states that particular attention must be paid to the needs of developing countries, In our experience, Codex decisions are far too often based, not on credible evidence of the risks to health in these countries, but on politically influenced consensus. This is not surprising when in the Nutrition Committee (CCNFSDU) over 40% of Codex delegates represent the food and related industries. They fund dinners, receptions and meetings and sit on government delegations. Indeed, there are often more industry than government delegates in the room.

The corporations promoting the most harmful products are complicit in the climate emergency – through deforestation, mono-cropping, land and sea grabbing, and the promotion of a host of risky technologies. The greenhouse gases and water usage caused by the production and distribution of formulas is growing. Aside from the presence of industry, government delegations typically contain few people from health ministries and no people from environmental ministries. Most government delegates are from Bureaux of Standards, trade and industry

2 Codex terminology should be consistent: One example of potential harm is the meaningless Industry term – ‘established history of apparently safe use’ This term appears four times in the Infant Formula and Follow-up Formula Standard and should be removed. This critically important loophole opens the door for producing industries to maintain untested/unsafe ingredients in these products.

3 Health /environment /animal protective Criteria for prioritizing Codex work. ENCA strongly supports the need for a strict prioritization mechanism that would establish whether standards should be revised, revoked or started. This process should frankly address all the global impacts, including the negative impact of Codex standards, not just the positive.

4 One clear example of why effective criteria are needed is the follow-up formula Standard. Because there was no such analysis or discussion about risks in 1987, and entirely unnecessary Standard was adopted that contained no safeguards and fuelled the global market for these needless products. The standard has been a major factor in the undermining of legislation to protect breastfeeding.

5 Codex should exercise extreme caution regarding the safety, ingredients and labelling of standards for all ultra-processed products, taking greater account of processing impacts on health and environment. The long shelf life needed for the global trade of foods invariably involves ultra-processing and the harms caused by these products is increasingly being recognised. It will be a fundamental challenge for Codex.

6 Animal Health. Codex should also consider the impact of corporate-driven food systems on animal health and welfare. Codex should not be endorsing powerful growth enhancing drugs such as Zilpaterol, (currently banned in the UK, EU, Russia and China) that are used purely for commercial reasons. These are cross-cutting issues involving health, veterinary medicine, ecology, food systems and the political control of resources. When considering these matters Codex needs to ensure that it takes all these global criteria into account. The risk of antimicrobial resistance (AMR) is recognised to be one of great global threat to public health:

7 Codex Standards should not be used as a ‘regulatory ceiling’ IBFAN, IACFO and ENCA have often intervened to bring specific and critically important issues to the attention of the Commission and its Committees, including that Codex texts are used by exporting nations in trade fora an effort to sabotage the adoption of effective safeguards in resource poor nations. We were pleased that the Codex Chair, in a statement to the World Breastfeeding Conference in Cairo, went some way to dispel the myth that Codex standards are a regulatory ceiling. Codex must do more to encourage national governments to adopt stronger health and environment protective regulations. Governments have the sovereign right to adopt any legislation they consider necessary to protect child health as long as it does not violate international trade principles. This aspect of policy making is highly relevant to the Codex Committee discussion on Agenda 7 - STRATEGIC PLAN 2020-2025: IMPLEMENTATION REPORT 2020-2021.

7 Codex should adopt stricter Transparency and Conflict of Interest safeguards. This issue needs careful thought and cooperation from Member States, especially in relation to the role of Science in the Codex Decision making Process. The Commission is mandated to advance health and fairness in trade and should take effective steps to protect the process from commercial interests. However, it should not create obstacles or suppress the participation of expert civil society organizations working towards this aim, since this would result in ill-informed policies, especially where public health and child protection are concerned.

IBFAN is pleased that after many years of complaint about the lack of transparency at CCNFSDU, Codex has at last allowed the webcasting of this Committee. While we understand the need for brevity in reports. Transcripts of the proceedings would be excellent to have. Much greater transparency, and conflict of interest safeguards are clearly needed. Member States should be discouraged from including health harming industries to sit on government delegations to Codex, since this provides unregulated access to policy-making at the highest and most influential level. Codex could warn governments of the negative impacts of allowing health-harming industries to be invited as legitimate 'partners' in health and food safety programs. Once agreed such warning should be written into the Procedural Manual

8 The public funding of the Codex Trust fund must be written into the Codex Manual, alongside an acknowledgment of the risks of private sector (including private philanthropies) influence on Codex decision making.

9 Environmental Impact of the Food system must be central. For too long Codex has been oblivious to the harm caused by global trade of unnecessary, plastic wrapped, denatured, ultra-processed products – many bearing deceptive claims. Codex must address the global impact of food production on greenhouse gas emissions and its impact on climate change, biodiversity, labour practices, protection of agricultural land and animal welfare. . Any efforts to improve or transform the Food System must be: human rights based, must not mask problems that need to be addressed; must not undermine food security; must not further exacerbate an already broken, harmful food system and must not facilitate the trade of harmful ultra-processed products

IBFAN and ENCA call for biodegradable packaging should not be considered beyond the remit of Codex.

10 Exercise caution when considering proposals from Multi-stakeholder Initiatives. The Corporate-influenced multi-stakeholder initiatives, such as Scaling Up Nutrition GAIN, Harvest Plus, have added to the confusion amongst Member States delegates to Codex. Multi-stakeholder initiatives promote private sector influence over public affairs and have undermined the efforts of those calling for effective conflict of interest regulations. Governments in resource-poor countries have come under pressure to favour market-led, product-based approaches to address malnutrition with health harming corporations as 'trustworthy' partners. Codex needs to tackle this problem head on and follow all WHO recommendations relating to nutrition and NCDs.

Biofortification is an example where Codex wasted many years discussing a highly promotional and misleading definition (that included all forms of agriculture including Genetic Modification) before discontinuing the work. IBFAN spoke many times about the promotional and misleading nature of the term Biofortification.

11 Safeguards regarding Products for Emergencies

Emergencies responses are often characterized by large influxes of unsolicited donations of baby feeding products, and evidence has shown that donations can often do more harm than good in emergencies situations. ENCA is concerned about the CCFL proposal for labelling exemptions of food aid in emergency situations. Those in emergency situations are more vulnerable to illness and malnutrition and extra precautions should be in place to ensure optimal, safe and informed labelling as mandated in all situations requiring food aid. All Codex

standards and Guidelines relating to emergencies should forbid inappropriate promotional appeals and should include references to WHA 55.25 that calls on Member States “to ensure that the introduction of micronutrient interventions and the marketing of nutritional supplements do not replace, or undermine support for the sustainable practice of, exclusive breastfeeding and optimal complementary feeding”

12 Requirements for exporting countries implementation, and monitoring of the International Code and subsequent WHA resolutions. The Codex Strategic Plan should encourage Member States to exercise jurisdiction to ensure manufacturers and distributors of products within the scope of the Code and foods for infants and young children can be held liable for practices that cross into or out of their countries and do not comply with regulatory measures that implement the Code.

Member States should prohibit manufacturers and distributors of products within the scope of the Code and foods for infants and young children from promoting products within the scope of the Code outside their borders across all channels and media, including digital marketing.

Member States should require multi-national companies, such as social media platforms, that do business or provide services in their countries to maintain nationally domiciled legal entities that can be held liable for breaches of regulatory measures intended to implement the Code. Licensing mechanisms should include requirements for Code compliance for entities whose content is made available in that jurisdiction.

Member States should monitor compliance and adapt regulatory measures to capture harmful marketing practices.

Where countries have put the Code and resolutions into law there should be no interference by exporting countries in the enforcement of these laws. To achieve the broader goals of mitigating the global crisis of malnutrition, rising epidemics of non-communicable diseases, environmental degradation, global warming, Codex must put the protection of maternal and child health on the forefront of its decision making and in the very least be inclusive of the decisions made by Member States at WHO and FAO for the protection of health, the environment and food security.

13 Strengthen Food Safety safeguards and protect decision making from commercial influence.

ENCA considers the inclusion of food safety for products for infants and young children to be of fundamental importance to Codex. We welcome the work by FAO in collaboration with WHO on the global FAO Food Safety Strategy.

Global Strategy for Food Safety says that: “Unsafe food disproportionately affects vulnerable groups in society, particularly infants, young children, the elderly and immunocompromised people.”

As mentioned before, human milk is the secure and safe food for children and breastfeeding is resilient, provides food, care and immune support and prevents malnutrition in ALL its forms. Babies, who are not breastfed are at greatest risk of water-borne diseases, with diarrhoeal disease the second biggest killer of under-fives. As climate-related emergencies increase, water scarcity and contamination are inevitably exacerbated. Breastfeeding in these circumstances is the only lifeline for infants and young children.

Inappropriate and unsafe feeding practices for this vulnerable population is linked to the promotion of formula feeding products which come with considerable nutritional (ingredients cannot replicate breastmilk’s complexity), contaminants (heavy metals, bisphenols, phthalates etc.) and intrinsic microbial risks (*C. sakazakii*, *Salmonella* species, *Clostridia* spores etc) leads to unnecessary use of these products and is a serious global food safety crisis, All exacerbated by the Covid – 19 pandemic and the increasingly serious impact of climate change.

Codex Food Safety Strategy must include provisions for the protection of breastfeeding and optimal complementary feeding by including the

recommendation for governments to implement, the International Code of Marketing of Breastmilk Substitutes and subsequent WHA resolutions on infant and young child feeding with effective monitoring and enforcement to protect this population from the harmful consequences of the promotion of unsafe feeding practices and ensure secure and safe feeding as a critical means to protect infant and young child health and achieving the Sustainable Development Goals.

14 Sustainability Labelling. As part of the wider remit of Codex, Codex must address sustainability, bio-diversity and environmental issues. However we are concerned that the Codex proposal for sustainability labelling is the wrong way forward, and risks leading to yet more “greenwashing” of ultraprocessed foods, providing yet another means to market products and increase market share.

The lack of government regulation and independent monitoring of labelling in many Member States and the predominance of food industry and self-regulated certification labelling schemes will almost certainly lead to counter-productive, wasteful unsubstantiated claims.

Codex should encourage Governments to focus on labelling initiatives that prioritise warnings rather than claims, are government-led, with legally binding safeguards that are substantiated with independent and verifiable evidence, independently monitored and government enforced.

The resources needed to legislate, enforce, monitor and substantiate sustainability claims and warnings effectively will be costly. In many cases this will be a counter-productive, wasteful and will utilize critical public health resources to facilitate the needs of the processed food industry rather, than bring about the “transformation of the world’s food systems that is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet” In countries where effective regulation is not a viable option, sustainability labelling should not be permitted.

It is IBFAN and ENCA’s experience that nutrition and health claims are rarely based on credible science and invariably misleading. When used to promote foods for infants and young children such labelling is especially deceptive and undermining of breastfeeding and WHO recommendations for optimal infant and young child feeding. Such claims put maternal, infant and young child health at risk and are forbidden by World Health Assembly Resolutions.

Codex Guidelines should encourage governments to follow several key principles to encourage fair, comparable and truthful labelling:

- Adequate, effective, legally binding and independently monitored safeguards must first be in place to ensure that human and planetary health is not undermined by misleading claims.
- The onus for reducing the impact of food systems on climate change should not be placed on consumers.
- Governments primary aim must be to protect and restore biodiversity, prevent the degradation of ecosystems and the wider environment, reduce the risks from emerging and re-emerging zoonotic epidemics and pandemics and curb the silent pandemic of antimicrobial resistance.

The Independently verified impact of ALL the factors that contribute to food production and food consumption (“from farm to fork”) should be used as criteria and they must include as a minimum:

- water consumption along the whole production chain
- source of ingredients - local or imported
- processing of ingredients
- processing of the final product
- environmental cost of the global supply chain
- global, regional and national transportation

- packaging - plastics – microplastics, chemicals such as PFAs
- labour practices
- agricultural practices (mono-culture, pesticides use, fertilisation....)
- animal health
- retailing, marketing and promotion

It is critically important that sustainability labelling must not be permitted for commercial milk formulas or foods for infants and young children to the age of 5 years. The risks of a sustainability claim being misleading are too great

endnotes:

[1] The Quadripartite Organizations – FAO and the United Nations Environment Programme (UNEP), the World Organisation for Animal Health (WOAH), and the World Health Organization (WHO) published the One Health Joint Plan of Action in 2022

PRINCIPLES CONCERNING THE PARTICIPATION OF INTERNATIONAL NON-GOVERNMENTAL ORGANIZATIONS IN THE WORK OF THE CODEX ALIMENTARIUS COMMISSION¹. Purpose The purpose of collaboration with International Non-Governmental Organizations is to secure for the Codex Alimentarius Commission, expert information, advice and assistance from International Non-Governmental Organizations and to enable organizations which represent important sections of public opinion and are authorities in their fields of professional and technical competence to express the views of their members and to play an appropriate role in ensuring the harmonizing of intersectoral interests among the various sectoral bodies concerned in a country, regional or global setting. Arrangements made with such organizations shall be designed to advance the purposes of the Codex Alimentarius Commission by securing maximum cooperation from International Non-Governmental Organizations in the execution of its programme. (page 237.).

5.1 Privileges of International Non-Governmental Organizations in "Observer Status" p. 239-240.

In 2016, The Lancet confirmed the critical importance of breastfeeding. Better breastfeeding practices could prevent the deaths of 823,000 children per year (mainly by preventing approximately half of all diarrhea episodes and one-third of infections). Of the total worldwide deaths, 311,000 (38%) are estimated to occur in Africa where approximately 16% of the world's population lives.

The importance of policy coherence is stressed by the UN Guiding Principles under Guiding Principle 8 (Ensuring policy coherence), which state that "States should ensure that governmental departments, agencies and other State-based institutions that shape business practices are aware of and observe the State's human rights obligations when fulfilling their respective mandates, including by providing them with relevant information, training and support." Lack of policy coherence can mean that achievement of elements of any initiative might impact negatively on others. The alignment of policies on sustainable development and human rights, avoids duplication of efforts and saves scarce resources for implementation.

CODE OF ETHICS FOR INTERNATIONAL TRADE IN FOOD INCLUDING CONCESSIONAL AND FOOD AID TRANSACTIONS CAC/RCP 20-1979. take special note of the last para: 4.4 National authorities should be aware of their obligations under the International Health Regulations (2005) with regard to food safety events, including notification, reporting or verification of events to the World Health Organisation (WHO). They should also make sure that the international code of marketing of breast milk substitutes and relevant resolutions of the World Health Assembly (WHA) setting forth principles for the protection and promotion of breast-feeding be observed.

2022 Marketing of breast-milk substitutes: national implementation of the international code, status report 2022 WHO UNICEF IBFAN

Calls to curb infant formula's carbon footprint, December 4, 2019, Australian National University <https://www.bpni.org/report/Carbon-Footprints-Due-to-Milk-Formula.pdf> <https://www.bpni.org/wp-content/uploads/2018/11/Green-Feeding-RC-Carbon-Footprint-10-Asian-Countries.pdf> <https://internationalbreastfeedingjournal.biomedcentral.com/articles/10.1186/s13006-019-0243-8> IBFAN's Greenfeeding papers. https://www.theguardian.com/environment/2017/jul/21/pepsico-unilever-and-nestle-accused-of-complicity-in-illegal-rainforest-destruction?CMP=share_btn_tw

COP27 – Can lessons be learned and the UPF trade controlled? IBFAN Statement. November 2022.

The food sector is known as a major source of anthropogenic greenhouse gas emissions, contributing about 30% of the total global emissions, through livestock, fisheries, crop production, land-use changes and processing¹. Writing in this issue of Nature Climate Change, Ivanovich et al. further confirm in their Analysis article that global food consumption can add nearly 1 °C to warming by the end of this century, driven by foods that are high sources of methane, such as beef, dairy and rice..Modern food emissions. Nat. Clim. Chang. (2023). <https://doi.org/10.1038/s41558-023-01643-2>

Risks of Ultra-Processed Foods (UPFs): UPFs form 50% of Britons' calorie intake; Nelson et al Premature Deaths Attributable to the Consumption of Ultraprocessed Foods in Brazil American Journal of Preventive Medicine 10.1016/j.amepre.2022.08.013 2022) <https://www.eurekalert.org/news-releases/970082>. Review article; Angel et al.Ultraprocessed Foods and Public Health: A Need for Education. Mayo Clinic Proceedings, Volume 94, Issue 11, November 2019, Pages 2156-2157; Wang et al. Trends in Consumption of Ultraprocessed Foods Among US Youths Aged 2-19 Years, 1999-2018.JAMA. 2021;326(6):519-530. doi:10.1001/jama.2021.10238; Neri et al. Ultraprocessed food consumption and dietary nutrient profiles associated with obesity: A multicountry study of children and adolescents. Obes Rev 2022 Jan;23 Suppl 1:e13387.do10.1111/obr.13387. Epub 2021 Dec 9; Nelson et al. Premature Deaths Attributable to the Consumption of Ultraprocessed Foods in Brazil. <https://doi.org/10.1016/j.amepre.2022.08.013>; FAO. Ultra-processed foods, diet quality, and health using the NOVA classification system Monteiro et al.

“One of the most relevant outcomes of the [WTO] review was the adoption of a "Decision of the Committee on Principles for the Development of International Standards, Guides and Recommendations." The Decision calls upon international standardizing bodies to observe a certain number of principles in their work, which include: transparency, openness, impartiality and consensus, effectiveness and relevance, and coherence. It also calls upon them to take the development dimension into account in the elaboration of their standards, guides and recommendations. International standardizing bodies that fulfil these criteria will be considered "international" within the meaning of the TBT Agreement".WTO publication WTO Agreements and Public Health, 2002 https://www.wto.org/english/res_e/booksp_e/who_wto_e.pdf

These threats have been highlighted in the 2023 Lancet Series on Breastfeeding 2023 INTERVENTIONS AT WTO AND CODEX RELATED TO NATIONAL IMPLEMENTATION OF THE WHO INTERNATIONAL CODE OF MARKETING OF BREASTMILK SUBSTITUTES. Katheryn Russ*

“The most alarming finding in our latest research is a very large proportion of greenhouse gas emission impact is associated with the so-called growing up milks or toddler formula ... In China, nearly half of the sales of milk formula is toddler formula.” Dr Julie Smith, of the Australian National University,

6“When the SUN casts a shadow” by FIAN International, IBFAN and the Society for International Development(SID) examined the Scaling up Nutrition (SUN) using the right to adequate food and nutrition legal framework and found among other things: that SUN favoured favored short-term medicalized and technical solutions; promoted intensive agriculture and technologies such as biofortification; neglected the commerciogenic causes of malnutrition (under and over nutrition). SUN had limited impact on reducing malnutrition while carrying negative implications for human rights;

<http://www.babymilkaction.org/wp-content/uploads/2018/10/IBFAN-PROPOSED-DRAFT-DEFINITION-FOR-BIOFORTIFICATION-2018-1.pdf>

<https://www.ennonline.net/ife> [https://www.ennonline.net/attachments/4343/Preventing-and-managing-inappropriate-donations-of-BMS-\(ENGLISH\).pdf](https://www.ennonline.net/attachments/4343/Preventing-and-managing-inappropriate-donations-of-BMS-(ENGLISH).pdf)

Waste disposal and the burning of rubbish increases methane emissions. “Plastics do not fully decompose and instead just continually break down into smaller and smaller pieces called microplastics. These microplastics pose a huge risk to wildlife and are extremely difficult to clean up. ...The best way to reduce the impact of single-use plastics on climate change is to stop using this type of plastic.

<https://www.colorado.edu/ecenter/2021/02/25/climate-impact-single-use-plastics>

<p>Q1 FIVS welcomes the opportunity to comment on the development of the Codex Strategic Plan 2026-2031. By way of background, 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 sustainability among our members and the wider sector, in keeping with the United Nations Sustainable Development Goals. Our membership includes producers, importers, exporters, and trade associations (currently accounting for 75% of the wine traded globally). We also welcome and collaborate effectively with affiliates from allied industries.</p> <p>FIVS believes Codex standards should stay within the remit of Codex's historical mandate, which is to protect the health of consumers and ensure fair practices in the food trade. Codex standards have been instrumental over the past 60 years in ensuring that foods are safe, wholesome, free from adulteration, and correctly labelled and presented to consumers. FIVS acknowledges that Codex needs to adapt to changing circumstances, including reviewing working modalities (as stated in point 2.2 below) to ensure adequate participation and timeliness. However we think Codex should focus on delivering standards that address food safety, quality and nutrition, which remains a challenge of paramount importance today.</p> <p>FIVS agrees with the assessment that the scientific basis that underpins Codex texts is fundamental to ensuring that Codex maintains its pre-eminence as the international reference for food safety and fair practices in food trade, as well as the primary source of science-based food standards for many countries and recognized by the WTO. FIVS worries that if Codex steps outside its area of expertise, this might undermine its credibility as the reference body for science-based standards and for the dispute settlement mechanism of WTO.</p> <p>FIVS will submit more detailed comments regarding Codex's engagement in the area of sustainability to the eWG on sustainability-related labelling chaired by New Zealand.</p>	<p>FIVS</p>
<p>Gafta represents the international grain and feed trade, established in 1878. Our membership comprises over 1,900 agricultural commodity companies in more than 100 countries and our aim is to promote free and open trade globally. We would like to submit some comments to CL/2023/65/OCS-EXEC:</p> <p>Gafta members transport millions of tons of agricultural commodities around the world daily and recognise all the global challenges facing us. Food must move from places of abundance to places of scarcity. As international trade grows, alignment and use of international standards such as Codex becomes even more important to facilitate trade and to ensure global food security.</p> <p>Our member companies work daily to implement new sustainable practices to reduce our impact on the planet and protect people, encouraging sustainable and resilient food supply chains. Trade is critical to food security and the ability to trade in food is central to the livelihoods of many of the world's rural poor. One in six people is fed by international trade in agricultural commodities.</p> <p>We fully support the setting up of the forward-looking group to consider new and emerging issues to ensure Codex remains relevant and up to date in developing food and safety quality standards to the benefit of all.</p> <p>Codex is the most important international standard-setting body in the area of food safety, the Codex Alimentarius plays a crucial role in protecting the health of the consumers enabling trade in agricultural products. Gafta believes the cornerstone of Codex 60 year success is that standards are set and developed based on science and take a risk-based approach, which gives producers and consumers the confidence that its standards are transparent, reliable, and predictable. This ensures food safety, leading to better nutrition, less food waste</p>	<p>GAFTA</p>

and greater food security as we transform our agri food systems.

In previous responses, Gafta has also supported all efforts to investigate further how to adapt Codex working modalities and to enhance the functioning and operations at Codex. Enabling Codex to perform its role more effectively and efficiently by addressing current capacity challenges, embracing new scientific and administrative methods of evaluation, and ensuring adequate resources are available, is essential to supporting global food security and trade.

Resources for Codex is key with stable and predictable funding. The biggest contribution to sustainability is Codex being resourced properly, setting and securing the adoption of science-based standards as widely as possible enables the sustainable development in the agrifood sector which is important in developing economies to access higher value markets, promoting resilient supply chains. Codex certainly can contribute to sustainability which is also echoed in other international fora by continuing along its core focus on food safety and trade and those standards that enable development.

The world is increasingly investing in making food and agricultural production systems more sustainable. Governments, the private sector, civil society, academia, philanthropy, and other stakeholders are already making significant investments, implementing practice changes, supporting research and innovation, and otherwise incentivising more sustainable foods systems.

This had led to calls from some Codex Members to expand Codex' role to consider the sustainability of food production more prominently in the standard-setting process. There are differing views on if and how Codex should address the broader imperatives around climate change, environment and sustainability.

We would like to bring the following document to your attention that sets out ten considerations to help Codex and its Members navigate this issue, and with a view to preserve and build on the achievements Codex Alimentarius has made over the past 60 years. We trust these insights will help guide the drafting of the next Codex Strategy (https://agrifood.net/wp-content/uploads/2023/04/IAFN-Codex-and-Sustainability-in-Food-and-Agricultural-Production_Final.pdf).

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Gafta members transport millions of tons of agricultural commodities around the world daily and recognise all the global challenges facing us. Food must move from places of abundance to places of scarcity. As international trade grows, alignment and use of international standards such as Codex becomes even more important to facilitate trade and to ensure global food security.

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<p>Codex is the most important international standard-setting body in the area of food safety, the Codex Alimentarius plays a crucial role in protecting the health of the consumers enabling trade in agricultural products. Gafta believes the cornerstone of Codex 60 year success is that standards are set and developed based on science and take a risk-based approach, which gives producers and consumers the confidence that its standards are transparent, reliable, and predictable. This ensures food safety, leading to better nutrition, less food waste and greater food security as we transform our agri food systems.</p> <p>In previous responses, Gafta has also supported all efforts to investigate further how to adapt Codex working modalities and to enhance the functioning and operations at Codex. Enabling Codex to perform its role more effectively and efficiently by addressing current capacity challenges, embracing new scientific and administrative methods of evaluation, and ensuring adequate resources are available, is essential to supporting global food security and trade.</p> <p>Resources for Codex is key with stable and predictable funding. The biggest contribution to sustainability is Codex being resourced properly, setting and securing the adoption of science-based standards as widely as possible enables the sustainable development in the agrifood sector which is important in developing economies to access higher value markets, promoting resilient supply chains. Codex certainly can contribute to sustainability which is also echoed in other international for a by continuing along its core focus on food safety and trade and those standards that enable development.</p> <p>The world is increasingly investing in making food and agricultural production systems more sustainable. Governments, the private sector, civil society, academia, philanthropy, and other stakeholders are already making significant investments, implementing practice changes, supporting research and innovation, and otherwise incentivising more sustainable foods systems.</p> <p>This had led to calls from some Codex Members to expand Codex' role to consider the sustainability of food production more prominently in the standard-setting process. There are differing views on if and how Codex should address the broader imperatives around climate change, environment and sustainability.</p> <p>We would like to bring the following document to your attention that sets out ten considerations to help Codex and its Members navigate this issue, and with a view to preserve and build on the achievements Codex Alimentarius has made over the past 60 years. We trust these insights will help guide the drafting of the next Codex Strategy (https://agrifood.net/wp-content/uploads/2023/04/IAFN-Codex-and-Sustainability-in-Food-and-Agricultural-Production_Final.pdf).</p>	
<p>Codex has the reputation of only providing standards in areas important for food trade. It is vital that Codex is recognized for its work to guide governments on food safety standards relevant to domestic food production. As a domestic priority, many governments would benefit from standards that apply to food safety in traditional markets for food.</p>	<p>GAIN</p>
<p>Q1 ICBA response: ICBA strongly supports maintaining the scientific foundation of Codex food standards and guidelines based on advice by the joint FAO/WHO expert bodies. Expanding the scope of Codex work into areas other than foods per se could detract from Codex' important work and mandate, which has been centered on safe foods in commerce since 1963. In view of limited resources, Member States must ensure Codex has the necessary funding to develop standards in a timely fashion to remain relevant and current in view of the fast-pace of innovative products coming to market. The critical value of Codex as a pre-eminent international food standard setting organization is exemplified by embracing transparent processes, being consensus-driven and following risk analysis principles.</p>	<p>ICBA</p>

Considering the drivers for change included in Appendix I, ICBA wishes to provide the following observations.

2.1 Emerging issues in food and feed safety

ICBA agrees on the need for Codex to be flexible and adaptive to the emerging food safety issues. We strongly support Codex committees' including emerging issues as a standing agenda item. We have found discussions on emerging issues that have been organized prior to plenary sessions through webinars and pre-session physical meetings valuable and strongly recommend that this practice is continued and encouraged by all technical committees. However, it is important that the procedure for prioritizing issues that are related to the scope of Codex be clear. This would provide more time to consider any emerging issues and new work proposals and would ensure that the new work items are relevant, fit-for-purpose and useful for members. Additionally, it would allow for a better prioritization of work items to ensure that limited resources are available and best used.

2.2 Global political, environmental, economic and health issues

ICBA recognizes physical plenary meetings are critical and are the best modality to drive Committee decisions forward. However, we also recognize that some Codex members are not able to attend physically, but can virtually monitor the meeting if given the opportunity to do so. To facilitate discussions and ensure progress during the meetings, only the delegate physically in the room should provide interventions during plenary (or pWG) discussions. Finally, to reconcile differences before the Committee convenes, we support the continued engagement and usage of existing mechanisms at the Committee disposal, such as eWGs, vWGs, pWGs.

2.2.1 High level global initiatives

ICBA recognizes the role that Codex already plays in delivering progress in achieving the Sustainable Development Goals (SDGs) and supporting the FAO and WHO strategic directions on food safety. Science- and evidence-based Codex food standards provide cost-effective tools for national food safety systems to consistently support these current global initiatives. ICBA cautions against the introduction of non-science-based considerations in Codex work that also could lead to inconsistencies in approaches of international agreements that would undermine the legitimate role of Codex in WTO SPS and TBT decisions and that could jeopardize Codex' relevance on the world stage. ICBA agrees the current Codex procedures already enable consideration of globally-relevant Other Legitimate Factors (OLFs) proposed by Members on a case-by-case basis and that there is no need for developing guidelines to further elaborate. Codex procedures can be leveraged to integrate foresight and preparedness for the emerging issues as part of the routine work process of Codex committees with scientific guidance by FAO and WHO.

2.2.2 Health, Fairness of International Trade, and Sustainability

Codex has a clear role in establishing science and evidence-based texts that incorporate safety and fairness of trade as stated in its mandate "to protect the health of consumers and ensure fair practices in the food trade." ICBA agrees that Codex texts can provide a framework that facilitates and supports addressing food safety hazards from all sources when setting risk management measures. However, Codex has a clear role to play and extending it into new areas where consensus may be difficult to achieve may result in eroding the value and usefulness of Codex texts by its Members.

Q2 ICBA response:

ICBA believes that Codex texts and work can inform and be integral to the assessment, management, and communications of food safety risks undertaken by the Quadripartite One Health Joint Plan of Action (OH JPA). The OH JPA promotes, in part, adopting public-private partnerships. Importantly, Codex successfully incorporates the viewpoints from a range of stakeholders in its work and leverages a

<p>transparent decision-making process, serving as a model of how to promote awareness and coordination among stakeholders (including private standard-setting bodies) along the food supply chain. This directly contributes to Action Track 4 of OH JPA, and ICBA notes that effective collaboration and participation of all actors in the food supply chain is necessary to ensure successful outcomes. While Codex can address any food safety risks posed by global foodborne hazards, and the One Health approach can provide a way of addressing Codex work priorities, we note that addressing environmental issues is not in the mandate of Codex.</p>	
<p>The Institute of Food Technologists (IFT), a long-time Codex Observer organization and unique individual member scientific body committed to advancing the science of food, appreciates the opportunity to provide input to CCEXEC regarding the development of the Codex Strategic Plan 2026-2031. Specifically, IFT is a global organization of approximately 12,000 individual members, in 95 countries, engaged since 1939 in helping solve many of the world's greatest food challenges through its broad scientific membership across academia, government and industry.</p> <p>Our mission is to connect global food system communities to promote and advance the science of food and its applications. We believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious, and accessible to all, and therefore, considers our engagement with Codex to be important to meeting the goals of our mission.</p> <p>Q1 IFT believes that Codex can support the broader FAO/WHO global goals around sustainability, One Health, food security and environmental protection by first, staying within the scope and mandate of Codex and focusing on the food safety, quality, nutrition and fair-trade topics that have been the marks of its last 60 years of work. Extending beyond its mandate and scope into other arenas would damage its successful functionality. Topics or issues brought forward in Codex that are outside the Codex focus on the safety, quality and nutrition of human food or fair trade in such food should be brought to the attention of other UN organizations by the Codex Secretariat and Executive Committee, such as the World Organization for Animal Health (WOAH) or International Plant Protection Convention (IPPC) for example. Beyond this, the following are key areas IFT believes Codex can help support the UN's broader goals:</p> <ul style="list-style-type: none"> • As mentioned in Annex 1, the issue of efficient & sustainable agri-food systems intersects with the food safety, quality and nutrition mission of Codex. Food loss and waste is a major food security concern, and the challenge of post-harvest food material protection from infestation by pests, damage or contamination from microbiological growth (e.g., mycotoxins) or contamination is directly linked to the safety and quality of the food for consumption within the Codex mandate. Hence development and implementation of codes of practice and guidelines in this area can serve a dual purpose and IFT strongly encourages them. • Food safety is a significant component of the broader topic of global food security, and Codex again can have a substantial impact on food security in this area through continued efforts toward harmonization of food safety systems. As the world continues to grow in the interconnectedness of global food trade and the supporting systems, the issue of food safety crises becomes more impactful (e.g., a mycotoxin crisis in one area can have a broader food safety impact than the region it occurred within and also be connected to food loss/waste). IFT would encourage Codex and FAO to consider development of a mechanism (akin to the Interpol model for crime) for the widespread sharing of food safety issues that cross national borders and can have potentially significant human health impact. Such a system would enable Codex member countries to share globally relevant food safety concerns efficiently when needed. Additionally, work on a shared food safety crisis tracking and data sharing system would help enable food system resiliency, another FAO goal stated in Annex 1. • Proper nutrition is a key component of consumer health protection, particularly for the most vulnerable across humanity. There are a number of territories where development of harmonized Codex nutrition guidance can be of substantial assistance. These include: 	<p>IFT</p>

<ul style="list-style-type: none"> • Development of harmonized global guidance for dietary nutrient needs across all demographics, including age, sex, etc. • Guidance regarding the intersection of heavy metal or mycotoxin contaminants in foods and dietary nutritional recommendations for foods to consume, particularly for vulnerable age groups (e.g., infants and children, elderly, immunocompromised, etc.) to ensure best long-term outcomes. • Development of globally applicable codes of practice or guidance for providing dietary/nutritional guidance by physicians & nutritionists that can be tailored to regional/local needs. • Development of guidance tools to help consumers, educators and influencers understand how to use all forms of foods, including shelf-stable, processed forms (e.g., dried, frozen, canned & fresh) as part of healthy dietary patterns, especially during crisis or emergency situations. <p>Q2 • IFT believes there would be definite benefits connected across the UN agencies, within the stated scope and mandate of those agencies, through further collaborative sharing of work and information. Since Codex's mandate and scope is food safety, quality, nutrition and fair trade, Codex members would benefit from first, moving any proposed Codex work associated with topics outside of that to other UN agencies (e.g., WOA), so that Codex would not be distracted by issues outside of its stated purpose. Secondly, setting up interagency, multidisciplinary, collaborative, member-based groups built upon the Codex model of member country voluntary participation to coordinate efforts toward One Health initiatives would be beneficial to Codex members & observers. Additionally, IFT believes that member-based scientific bodies like IFT can have a significant role to play in supporting these UN-based, collaborative, multidisciplinary groups due to their scientific breadth and objectivity.</p> <ul style="list-style-type: none"> • Regarding expansion of capacities for food safety risk assessment, management and communication, IFT believes that development and articulation of a code of practice for food safety risk assessment by countries would be an excellent first step, followed by guidance on best practice risk management approaches for member countries. The disparity in both risk assessment and risk management approaches globally has created tremendous consumer questions regarding the definition of what is safe to eat, and improved alignment on risk assessment and risk management approaches across member countries could substantially decrease concern by global consumer populations. Lastly, an enhanced One Health communication approach on food safety risks that countries can utilize, built off of the Codex foundation on food safety, will assist with global trade and reducing consumer concerns about food safety. 	
<p>Request for comments on the development of the Codex Strategic Plan 2026-2031 – Part 1 – how Codex works as part of the multilateral system on food and trade CL2023/65/OCSEEXEC http://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/en</p> <p>As the first step in this programme of engagement, Members and Observers are invited to provide responses to the following questions, which are based on Annex I: Codex standards, put in place for food safety, quality, and nutrition, may also contribute to other areas. In your view, how could Codex support “the broader global goals around sustainability, one health, food security and environmental protection through the development of international food standards that address any potential issues for consumer health protection or fair trade practices arising from implementation of initiatives to advance sustainability interests”? Where do you see particular priorities for Codex? The Quadripartite One Health Joint Plan of Action focuses on supporting and expanding capacities in six areas, including the assessment, management and communication of food safety risks. It also promotes multinational, multi-sector, multidisciplinary collaboration. What benefits might there be to Codex and its Members from such collaboration across the multilateral system for trade and food?</p>	<p>International Baby Food Action Network</p>

IBFAN RESPONSE:

IBFAN is pleased to contribute to this important discussion on how Codex standards on food safety, quality and nutrition can support the broader goals of sustainability, one health, food security and environmental protection

The aim of Codex since its foundation in the early 60s has been to protect the health of consumers and ensure fair practices in the food trade. However, the permissive global trade of countless ultra-processed products, standardized by Codex has sadly, harmed rather than protected the health of humans and the environment . The agri-food industry has used Codex to undermine bio-diverse, traditional food cultures and in many countries the deforestation, mono-cropping, land-grabbing and risky technologies that have had a devastating impact on human and planetary health. Analyses are now showing that UPF consumption is a significant cause of non-communicable diseases and premature death.

Since breastmilk substitutes are global commodities, trade has been a central concern of IBFAN since its inception and IBFAN has necessarily worked to improve trade rules, attending Codex Alimentarius meetings since 1995 when the World Trade Organisation recognised Codex standards as the reference point for dispute settlement mechanism. We see the participation of independent International NGOs as an integral and essential part of Codex that should be recognised and enhanced in the new Strategic Plan.

IBFAN's main focus has been to achieve policy coherence between Codex standards and the recommendations of the World Health Assembly, in particular the International Code and the subsequent relevant WHA Resolutions in order to protect breastfeeding and optimal complementary feeding and ensure the highest attainable standard of health for mothers and children. Breastfeeding is a resilient practice that provides food, care and immune support, protects against malnutrition in all its forms and is a lifeline for babies in all situations , including and especially those in emergency situations. Breastfeeding and complementary feeding with local, culturally appropriate family foods are the world's most sustainable, food secure and environmentally protective means of feeding infants and young children. Breastfeeding is the nurturing relationship of the mother baby dyad and is profoundly affected, displaced and undermined by weak Codex standards and trade rules. As a result of the unsafe feeding exacerbated by harmful and aggressive marketing there are still an estimated 800,000 thousand infants and young child deaths each year, with over 330,000 in the African region alone. Many more suffer from malnutrition or do not reach their full potential.

In order to protect breastfeeding and optimal complementary feeding, it is essential to tackle many cross-cutting broader issues that affect Codex decisions, namely its poor transparency and Conflicts of Interest safeguards and the difficulty of achieving policy coherence between Codex decisions and those made by the UN bodies, and in particular the parent organizations of Codex, WHO and FAO.

The failure of Codex to adequately address these problems has had a profoundly damaging impact on health, the environment and has left mothers and children exposed to the will of marketeers and powerful exporting countries – entities that benefit from unrestricted trade but are never held financially responsible for these harms. All the 'costs' are externalized to resource-poor governments, families, babies and the environment.

IBFAN advocacy has helped bring about partial incorporation of WHA resolutions into most Codex standards and guidelines relating to infant and young child feeding There remain significant discrepancies and loopholes. The over-arching requirement in the Code of Ethics for International Trade in Food (CAC/RCP 20-1979) that calls on national authorities to 'observe' the International Code and resolutions of the

World Health Assembly (WHA) is ignored by far too many governments., ,

Although nearly all Member states endorsed the International Code of Marketing of Breast-milk Substitutes in 1981 and the 20 subsequent, relevant World Health Assembly resolutions that strengthen it, these essential minimum policy requirements are not made fully mandatory in the Codex standards relating to infant and young child feeding products. It is high time that they are.

If there is to be the radical transformation of the global food system Codex working procedures must be improved. Below we provide some suggestions for changes to Codex Priorities, many of which should be included in the Procedural Manual:

1 Decisions must be protected from commercial influence and based on relevant and convincing evidence:

Despite the fact that the Codex Procedural Manual states that particular attention must be paid to the needs of developing countries, In IBFAN's experience, Codex decisions are far too often based, not on credible evidence of the risks to health in these countries, but on politically influenced consensus. This is not surprising when in the Nutrition Committee (CCNFSDU) over 40% of Codex delegates represent the food and related industries. They fund dinners, receptions and meetings and sit on government delegations. Indeed, there are often more industry than government delegates in the room.

The corporations promoting the most harmful products are complicit in the climate emergency – through deforestation, mono-cropping, land and sea grabbing, and the promotion of a host of risky technologies. The greenhouse gases and water usage caused by the production and distribution of formulas is growing. Aside from the presence of industry, government delegations typically contain few people from health ministries and no people from environmental ministries. Most government delegates are from Bureaux of Standards, trade and industry

2 Codex terminology should be consistent: One example of potential harm is the meaningless Industry term – 'established history of apparently safe use' This term appears four times in the Infant Formula and Follow-up Formula Standard and should be removed. This critically important loophole opens the door for producing industries to maintain untested/unsafe ingredients in these products.

3 Health /environment /animal protective Criteria for prioritizing Codex work. IBFAN strongly supports the need for a strict prioritization mechanism that would establish whether standards should be revised, revoked or started. This process should frankly address all the global impacts, including the negative impact of Codex standards, not just the positive.

4 One clear example of why effective criteria are needed is the follow-up formula Standard. Because there was no such analysis or discussion about risks in 1987, and entirely unnecessary Standard was adopted that contained no safeguards and fuelled the global market for these needless products. The standard has been a major factor in the undermining of legislation to protect breastfeeding.

5 Codex should exercise extreme caution regarding the safety, ingredients and labelling of standards for all ultra-processed products, taking greater account of processing impacts on health and environment. The long shelf life needed for the global trade of foods invariably involves ultra-processing and the harms caused by these products is increasingly being recognised. It will be a fundamental challenge for Codex.

6 Animal Health. Codex should also consider the impact of corporate-driven food systems on animal health and welfare. Codex should not be endorsing powerful growth enhancing drugs such as Zilpaterol, (currently banned in the UK, EU, Russia and China) that are used purely for commercial reasons. These are cross-cutting issues involving health, veterinary medicine, ecology, food systems and the political control of resources. When considering these matters Codex needs to ensure that it takes all these global criteria into account. The risk of antimicrobial resistance (AMR) is recognised to be one of great global threat to public health:

7 Codex Standards should not be used as a 'regulatory ceiling' IBFAN, IACFO and ENCA have often intervened to bring specific and critically important issues to the attention of the Commission and its Committees, including that Codex texts are used by exporting nations in trade fora an effort to sabotage the adoption of effective safeguards in resource poor nations. We were pleased that the Codex Chair, in a statement to the World Breastfeeding Conference in Cairo, went some way to dispel the myth that Codex standards are a regulatory ceiling. Codex must do more to encourage national governments to adopt stronger health and environment protective regulations. Governments have the sovereign right to adopt any legislation they consider necessary to protect child health as long as it does not violate international trade principles. This aspect of policy making is highly relevant to the Codex Committee discussion on Agenda 7 - STRATEGIC PLAN 2020-2025: IMPLEMENTATION REPORT 2020-2021.

7 Codex should adopt stricter Transparency and Conflict of Interest safeguards. This issue needs careful thought and cooperation from Member States, especially in relation to the role of Science in the Codex Decision making Process. The Commission is mandated to advance health and fairness in trade and should take effective steps to protect the process from commercial interests. However, it should not create obstacles or suppress the participation of expert civil society organizations working towards this aim, since this would result in ill-informed policies, especially where public health and child protection are concerned.

IBFAN is pleased that after many years of complaint about the lack of transparency at CCFSDU, Codex has at last allowed the webcasting of this Committee. While we understand the need for brevity in reports. Transcripts of the proceedings would be excellent to have. Much greater transparency, and conflict of interest safeguards are clearly needed. Member States should be discouraged from including health harming industries to sit on government delegations to Codex, since this provides unregulated access to policy-making at the highest and most influential level. Codex could warn governments of the negative impacts of allowing health-harming industries to be invited as legitimate 'partners' in health and food safety programs. Once agreed such warning should be written into the Procedural Manual

8 The public funding of the Codex Trust fund must be written into the Codex Manual, alongside an acknowledgment of the risks of private sector (including private philanthropies) influence on Codex decision making.

9 Environmental Impact of the Food system must be central. For too long Codex has been oblivious to the harm caused by global trade of unnecessary, plastic wrapped, denatured, ultra-processed products – many bearing deceptive claims. Codex must address the global impact of food production on greenhouse gas emissions and its impact on climate change, biodiversity, labour practices, protection of agricultural land and animal welfare. Any efforts to improve or transform the Food System must be: human rights based, must not mask problems that need to be addressed; must not undermine food security; must not further exacerbate an already broken, harmful food system and must not facilitate the trade of harmful ultra-processed products

IBFAN calls for biodegradable packaging. This should not be considered beyond the remit of Codex.

10 Exercise caution when considering proposals from Multi-stakeholder Initiatives. The Corporate-influenced multi-stakeholder initiatives, such as Scaling Up Nutrition GAIN, Harvest Plus, have added to the confusion amongst Member States delegates to Codex. Multi-stakeholder initiatives promote private sector influence over public affairs and have undermined the efforts of those calling for effective conflict of interest regulations. Governments in resource-poor countries have come under pressure to favour market-led, product-based approaches to address malnutrition with health harming corporations as 'trustworthy' partners. Codex needs to tackle this problem head on and follow all WHO recommendations relating to nutrition and NCDs.

Biofortification is an example where Codex wasted many years discussing a highly promotional and misleading definition (that included all forms of agriculture including Genetic Modification) before discontinuing the work. IBFAN spoke many times about the promotional and misleading nature of the term Biofortification.

11 Safeguards regarding Products for Emergencies

Emergencies responses are often characterized by large influxes of unsolicited donations of baby feeding products, and evidence has shown that donations can often do more harm than good in emergencies situations. IBFAN is concerned about the CCFL proposal for labelling exemptions of food aid in emergency situations. Those in emergency situations are more vulnerable to illness and malnutrition and extra precautions should be in place to ensure optimal, safe and informed labelling as mandated in all situations requiring food aid. All Codex standards and Guidelines relating to emergencies should forbid inappropriate promotional appeals and should include references to WHA 55.25 that calls on Member States “to ensure that the introduction of micronutrient interventions and the marketing of nutritional supplements do not replace, or undermine support for the sustainable practice of, exclusive breastfeeding and optimal complementary feeding”

12 Requirements for exporting countries implementation, and monitoring of the International Code and subsequent WHA resolutions.

The Codex Strategic Plan should encourage Member States to exercise jurisdiction to ensure manufacturers and distributors of products within the scope of the Code and foods for infants and young children can be held liable for practices that cross into or out of their countries and do not comply with regulatory measures that implement the Code.

Member States should prohibit manufacturers and distributors of products within the scope of the Code and foods for infants and young children from promoting products within the scope of the Code outside their borders across all channels and media, including digital marketing.

Member States should require multi-national companies, such as social media platforms, that do business or provide services in their countries to maintain nationally domiciled legal entities that can be held liable for breaches of regulatory measures intended to implement the Code. Licensing mechanisms should include requirements for Code compliance for entities whose content is made available in that jurisdiction.

Member States should monitor compliance and adapt regulatory measures to capture harmful marketing practices.

Where countries have put the Code and resolutions into law there should be no interference by exporting countries in the enforcement of these laws. To achieve the broader goals of mitigating the global crisis of malnutrition, rising epidemics of non-communicable diseases, environmental degradation, global warming, Codex must put the protection of maternal and child health on the forefront of its decision making and in the very least be inclusive of the decisions made by Member States at WHO and FAO for the protection of health, the environment and food security.

13 Strengthen Food Safety safeguards and protect decision making from commercial influence.

IBFAN considers the inclusion of food safety for products for infants and young children to be of fundamental importance to Codex. We welcome the work by FAO in collaboration with WHO on the global FAO Food Safety Strategy.

Global Strategy for Food Safety says that: “Unsafe food disproportionately affects vulnerable groups in society, particularly infants, young children, the elderly and immunocompromised people.”

As mentioned before, human milk is the secure and safe food for children and breastfeeding is resilient, provides food, care and immune support and prevents malnutrition in ALL its forms. Babies, who are not breastfed are at greatest risk of water-borne diseases, with diarrhoeal

disease the second biggest killer of under-fives. As climate-related emergencies increase, water scarcity and contamination are inevitably exacerbated. Breastfeeding in these circumstances is the only lifeline for infants and young children.

Inappropriate and unsafe feeding practices for this vulnerable population is linked to the promotion of formula feeding products which come with considerable nutritional (ingredients cannot replicate breastmilk's complexity), contaminants (heavy metals, bisphenols, phthalates etc.) and intrinsic microbial risks (*C. sakazakii*, *Salmonella* species, *Clostridia* spores etc) leads to unnecessary use of these products and is a serious global food safety crisis, All exacerbated by the Covid – 19 pandemic and the increasingly serious impact of climate change.

Codex Food Safety Strategy must include provisions for the protection of breastfeeding and optimal complementary feeding by including the recommendation for governments to implement, the International Code of Marketing of Breastmilk Substitutes and subsequent WHA resolutions on infant and young child feeding with effective monitoring and enforcement to protect this population from the harmful consequences of the promotion of unsafe feeding practices and ensure secure and safe feeding as a critical means to protect infant and young child health and achieving the Sustainable Development Goals.

14 Sustainability Labelling. As part of the wider remit of Codex, Codex must address sustainability, bio-diversity and environmental issues. However we are concerned that the Codex proposal for sustainability labelling is the wrong way forward, and risks leading to yet more “greenwashing” of ultraprocessed foods, providing yet another means to market products and increase market share.

The lack of government regulation and independent monitoring of labelling in many Member States and the predominance of food industry and self-regulated certification labelling schemes will almost certainly lead to counter-productive, wasteful unsubstantiated claims.

Codex should encourage Governments to focus on labelling initiatives that prioritise warnings rather than claims, are government-led, with legally binding safeguards that are substantiated with independent and verifiable evidence, independently monitored and government enforced.

The resources needed to legislate, enforce, monitor and substantiate sustainability claims and warnings effectively will be costly. In many cases this will be a counter-productive, wasteful and will utilize critical public health resources to facilitate the needs of the processed food industry rather, than bring about the “transformation of the world’s food systems that is needed urgently, based on a One Health approach that protects and promotes the health of humans, animals and the planet” In countries where effective regulation is not a viable option, sustainability labelling should not be permitted.

It is IBFAN’s long experience that nutrition and health claims are rarely based on credible science and invariably misleading. When used to promote foods for infants and young children such labelling is especially deceptive and undermining of breastfeeding and WHO recommendations for optimal infant and young child feeding. Such claims put maternal, infant and young child health at risk and are forbidden by World Health Assembly Resolutions.

Codex Guidelines should encourage governments to follow several key principles to encourage fair, comparable and truthful labelling:

- Adequate, effective, legally binding and independently monitored safeguards must first be in place to ensure that human and planetary health is not undermined by misleading claims.
- The onus for reducing the impact of food systems on climate change should not be placed on consumers.
- Governments primary aim must be to protect and restore biodiversity, prevent the degradation of ecosystems and the wider environment, reduce the risks from emerging and re-emerging zoonotic epidemics and pandemics and curb the silent pandemic of antimicrobial resistance.

The Independently verified impact of ALL the factors that contribute to food production and food consumption (“from farm to fork”) should be used as criteria and they must include as a minimum:

- water consumption along the whole production chain
- source of ingredients - local or imported
- processing of ingredients
- processing of the final product
- environmental cost of the global supply chain
- global, regional and national transportation
- packaging - plastics – microplastics, chemicals such as PFAs
- labour practices
- agricultural practices (mono-culture, pesticides use, fertilisation....)
- animal health
- retailing, marketing and promotion

It is critically important that sustainability labelling must not be permitted for commercial milk formulas or foods for infants and young children to the age of 5 years. The risks of a sustainability claim being misleading are too great