

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 1, 2, 3, 4, 5, 6, 7, 8 and 9

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

#### Twenty-seventh Session

(Comments submitted by Burundi)

Burundi appreciates the opportunity to provide comments on the different agenda items to be discussed by the 27<sup>th</sup> Codex Committee on Food Import and Export Inspection and Certification Systems.

#### Agenda Item 1

CX/FICS 24/27/1 Rev1

##### Adoption of the Agenda

**Position:** Burundi supports the adoption of the Provisional Agenda items as circulated.

#### Agenda Item 2

CX/FICS 24/27/2

##### Matters arising from the 46th Session of the Codex Alimentarius Commission and its Executive Committee

**Position:** Burundi notes the matters arising from the 46th sessions of the Codex Alimentarius Commission (CAC 46) and its executive committee (CCEXEC85 and CCEXEC86), and matters arising from other subsidiary bodies as well as their recommendations.

#### Agenda Item 3

CX/FICS 24/27/3

##### Information on activities of FAO and WHO and other international organizations relevant to the work of CCFICS-

**Position:** Burundi takes note and appreciates the support on assessment of food safety system received by some partner states (Rwanda, Uganda, and Kenya) and requests FAO/WHO to extend similar support to the other partner states (United Republic of Tanzania, Somalia, Burundi, South Sudan, and Democratic Republic of Congo).

Burundi appreciates the activities of WHO using the INFOSAN system in addressing issues of food fraud and food safety emergencies. However, Burundi also notes that there are challenges with the effective functioning of the INFOSAN system at the national level as well as in the region and requests WHO to assess the challenges to clearly define the need for strengthening INFOSAN in Burundi.

#### Agenda Item 3.1

CX/FICS 24/27/3 Add.1

##### Information from UNIDO, WTO and STDF, Secretariats and OECD-

**Position:** Burundi appreciates and takes note of the activities of international organizations, as per the reports of UNIDO, WTO and STDF Secretariats, and OECD. EAC welcomes the recent approval of the guidelines on remote audit and inspection in regulatory frameworks and requests STDF and UNIDO to support the implementation of these guidelines by the respective Partner states in the region.

#### Agenda Item 4

CX/FICS 24/27/4

### **Proposed draft consolidated Codex guidelines related to equivalence**

**Position:** Burundi thanks the EWG chair and its Co-chairs for their efforts to prepare the proposed draft consolidated Codex guidelines related to equivalence. Burundi supports the consideration of the proposed draft guidelines at CCFICS27 and requests the following proposals as the document proceeds to Step 5.

#### **On Section 4: Definition:**

**Question1 Position:** Burundi supports and agrees with the current approach and wording. They are well supported by the guidelines in CXG 101-2023 and have a basis with the following minor amendments: For the term “**equivalence**” to be defined as “The capability of different NFCS, in whole or in part, or different specified measures, to achieve the same objectives, **and related outcomes or level of protection**”.

**Rationale:** To align with CXG 101-2023.

**Question2 Position:** Burundi supports retention of both definitions of the terms “Measure” and “Requirements”

**Rationale:** In the text, requirements have been used in section 6 step 2, removing it will have an impact on the rest of the document. As noted, “measure” can apply to either the importing or exporting country and “requirements” only apply to the importing country’s conditions for trade.

#### **On Section 4: Principles:**

**Position:** Burundi notes that the section related to principles is 5 not 4 and proposes proper numbering which should be extended to the entire guideline.

**Rationale:** In numbering sections, the sections on “*Principles*” and “*Definition*” have the same number 4.

**Question3: Position:** Burundi supports the inclusion of “Demonstration of Equivalence” as a principle.

**Rationale:** It is an important principle regarding safety and compliance where additional information/data can be provided. The text as provided is not restrictive and at the same time promotes specificity towards the measures required by the importing country to achieve its objectives in protecting consumer health and fair practices in food trade.

#### **Questions 4, 4a and 5:**

**Position:** Burundi does not agree on the need for separate assessment process sections for systems equivalence and equivalence of measures.

**Rationale:** Burundi supports that any specific guidance related to a difference in the assessment process should be included as additional or amended text in the current Step 5. Burundi has no additional content regarding Step 5 as the flow is adequate.

### **Agenda Item 5**

**CX/FICS 24/27/5**

#### **Draft guidelines on the Prevention and Control of food fraud**

**General Comment:** Burundi appreciates the EWG for the work well done and notes the progress made in developing these guidelines. Burundi recommends advancing the Draft Guidelines on the Prevention and Control of Food Fraud to the next Codex standard elaboration process.

#### **Question1.**

**Position:** Burundi supports to retain Para 6 bis with inclusion of stakeholder collaborations considering their critical role that stakeholders play in an effective anti-food fraud strategy.

**Rationale:** Para 6 bis. provides additional information on the role of behavior of people and their culture.

**Burundi further proposes the text in the square brackets to be amended to read:** Fundamental to the successful functioning of any food fraud combatting strategy is **stakeholder collaboration** in the establishment and maintenance of an anti-food fraud culture acknowledging the importance of human behaviors in protecting the integrity of the food supply chain and presenting food/feed in a manner so as not to deceive consumers

**Rationale:** stakeholder involvement is important in ownership in the implementation of strategic actions

**Question2:**

**Position:** Burundi proposes the deletion of the words in square brackets and be rearranged to read:

The purpose is to provide guidance to competent authorities and FBOs on the prevention, detection, mitigation, and control of food fraud including **Feed for Food producing animals** to help protect the health of consumers and to ensure fair practices in food trade, ~~including feed for food-producing animals [that may impact human food safety]~~. Aspects related to food fraud are already addressed through many existing Codex texts; this guidance is intended to support or supplement existing Codex texts by providing additional guidance specific to food fraud that can be considered within NFCS<sup>3</sup>.

**Rationale:** The deleted wording in square brackets is already covered in the first part of the para.

**Question3.**

**Position:** Burundi proposes the retention of footnote 3 as is without any amendments on intellectual property.

**Rationale:** Intellectual properties are covered by different Competent authorities' jurisdictions within the region and are beyond the scope of this guideline.

**Question4.**

**Position:** Burundi supports that 7bis be retained and remove the square brackets.

**Rationale:** This is outside the scope of Codex. Investigation and prosecution are handled differently depending on the country's legal system.

**Question 5a:**

**Position:** Burundi proposes the retention of the two broad-based principles. Burundi further proposes that the principle one heading should be arranged to read ~~Control and~~ **Prevention and Control of Food Fraud**.

**Rationale:** To align with the flow of the text in the chapeau of para 8.

**Question5b:**

**Position:** Burundi proposes to retain "fair trade practices"

**Rationale:** To align with the Codex mandate and since integrity is covered in measures to protect consumers.

**Question6:**

**Position:** Burundi supports the deletion of "b. bis" and the retention of "e"

**Rationale:** This is because clause 10 "e" is clear and broad enough to cover "b. bis".

**Question7:**

**Position:** Burundi supports the retention of 15 ter

**Rationale:** Considering the impact of food fraud as an emerging risk in food safety, it is recommended to leverage on new technologies in-order to devise mitigative measures that are important in the prevention and control of food fraud.

**Agenda Item 6****CXG 60-2006)- (CX/FICS 24/27/6****Draft revision and updating of the Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System**

**Position:** Burundi supports the advancement of the draft revised Principles and Guidelines for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System (CXG 60-2006) to Step 5 with the comments below for consideration.

**Rationale:** Burundi supports advancing the draft revised Principles and Guidelines for Traceability/Product Tracing (CXG 60-2006) to Step 5, as they are essential for enhancing food safety, facilitating market access, and promoting

transparency within food systems. These principles are especially valuable for African countries, where strengthening food inspection and certification is crucial for protecting consumers, accessing global markets, and building trust among trading partners. Moreover, aligning with these international standards supports progress towards responsible food production.

#### **Preamble, Paragraph 1:**

**Position:** Burundi proposes retention and amendment of the text in square brackets by deleting the word “products” after food to read: [Traceability/product tracing consists of acquiring information **which can easily be retrieved** about **the movement** of food, **Food ingredients, and packaging** along the supply chain all the way to the consumer.]

**Rationale:** Food as defined by Codex is more embracing rather than ‘food products’ that could imply focus on only the finished products i.e. Food means any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of “food” but does not include cosmetics or tobacco or substances used only as drugs. This is also to further qualify the information that is being acquired for traceability/ Product tracing and provide additional clarity as well as be consistent with the document e.g. in clause 10.

#### **Preamble, Paragraph 2:**

**Position:** Burundi proposes that para 2 be deleted and taken to scope.

**Rationale:** The preamble should be limited to the introduction of the subject; traceability/product tracing. The statement in paragraph 2 extends to the applicability of draft revised Principles and Guidelines which best fits in the scope.

#### **Scope:**

**Position:** Burundi proposes amendments to the scope to read:

This document provides guidance to assist Competent Authorities in establishing traceability/product tracing as part of their NFCS. It also ~~provides guidance to~~ **guides** Food Business Operators (FBOs) on **the** implementation of traceability/product tracing within their food operations and throughout the food supply chain. **These guidelines are intended to promote good practice, not mandate a single way to conduct traceability/product tracing.**

**Rationale:** Incorporated para 2 of the preamble into the scope where it adequately fits.

#### **Definitions**

**Position:** Burundi proposes all the definitions in the appendix to be part of para 9 of the guideline and proposes the opening statement to read: ‘The following definitions apply’.

**Rationale:** The definitions have been used in the standard and are better defined within the definitions section.

#### **Para 12 d and e:**

**Position:** Burundi proposes that **Para 12 d and e** should be amended and combined to read:

Ensure ~~Test~~ their traceability/product tracing system ~~to ensure it operates as intended.~~ ~~e. Implement the traceability/product tracing system~~ and adapted to their organization, their sector, their supplier profile, customer requirements (contractual requirements) and legal requirements. Based on these, evaluate the internal and external needs. Identify the data/information that needs to be traced and define the parameters of traceability.

**Rationale:** To make the guideline general and not prescriptive. The merging of the two statements brings more clarity to the new text.

#### **Para 24:**

**Position:** EAC proposes the modification of the text in the square brackets to read:

“To encourage interoperability, standardization of syntax (formats) and semantics (meanings) of data/information, that are shared wholly or partly by different systems., ~~may be useful. This sharing can be internal (among different business processes of an organization) or external (between different organizations).~~ Competent authorities may ~~want to~~ consider utilizing international data standards<sup>6</sup> as a benchmark for their traceability/product tracing.”

**Rationale:** To simplify the para by not being prescriptive on data sharing.

To encourage interoperability, standardization of syntax (formats) and semantics (meanings) of data/information, that are shared wholly or partly by different systems may be useful. competent authorities may consider utilizing international data standards<sup>6</sup> as a benchmark for their traceability/product tracing.”

**Para 30:**

**Position:** Burundi proposes the retention of the text in the square brackets.

**Rationale:** It provides further guidance and is important to the user.

#### **Agenda Item 7**

**CX/FICS 24/27/7**

##### **Discussion paper on appeal mechanism in the context of rejection of imported food-**

**Position:** Burundi appreciates the work done by India and Nigeria in preparation for this discussion paper and supports the development of the Codex Guidance on appeal mechanism in the context of rejection of imported food

Burundi: Burundi supports the proposal for progressing the discussion paper to the commission for consideration as NWI as this will address the existing gaps due to the non-availability of guidance on an appeal mechanism. Currently, few countries provide for only importers to file an appeal which is contrary to CXG 25-1997 wherein exporter/competent authority of exporting country have been identified as important stakeholders.

#### **Agenda Item 8**

**CX/FICS 24/27/8**

##### **Discussion paper on the standardization of sanitary requirements-**

**Position:** Burundi appreciates the discussion paper prepared by Brazil with the assistance of Australia, New Zealand, Spain, and the United States of America and Supports:

- a) The proposal for the new work on the standardization of sanitary requirements as set out in the attached project document (Appendix I) for CX/FICS 24/27/8.
- b) to establish an Electronic Working Group (EWG) to define the criteria and method to evaluate the existing requirements to propose the taxonomy and ontology on the standardization to represent sanitary requirements that can be applied to any type of product.

**Rationale:** Burundi supports the proposal for NWI as this standardization will enable new processes to be designed and implemented based on data collection and reuse, private-public interoperability, and track and trace strategies. It will also enable to manage hundreds of certificate models that lead to errors and inefficient processes and controls. Thirdly it will assist countries that are having difficulties implementing the electronic certification systems mainly related to the incorporation of the eCERT document into the existing processes

#### **Agenda Item 9.1** 24/27/9

**CX/FICS**

##### **Review and update of Appendix A - the list of emerging global issues-**

**Position:** Burundi supports the updated list as contained in Appendix A – the list of emerging global issues, takes note of the overview of the 8 emerging issues from the intersessional meeting, and supports the new work proposals prepared by Norway and Australia. The emerging global issues are significant and may impact the work of CCFICS and recognize existing texts or new work proposals relevant to each issue.

#### **Agenda Item 9.2**

**CX/FICS 24/27/9 Add.1**

##### **Proposals for New work related to emerging global issues - Part 1 - Discussion paper on establishment listing**

**Position: Burundi** appreciates Norway for the development of this discussion paper on establishment listing. The paper discusses pertinent issues including the increased requests for data in the food trade, which leads up to the development of more and more different systems for information sharing and not always based on food safety and associated risks. In particular, the request for establishment listings have increased and more countries are developing different listings and systems for the exchange of information.

#### **Agenda Item 9.21**

**CX/FICS 24/27/9 Add.2**

##### **Proposals for New work related to the emerging global issues - Part 2: A discussion paper on the digitization of the National Food Control Systems**

**Position: Burundi** appreciates the discussion paper Prepared by Australia, the Netherlands, and the United Kingdom and supports the proposal that CCFICS leads the development of new high-level principles that capture

key considerations that guide countries in the process, of looking to start the process, of digitalizing relevant and suitable parts of their national food control systems coherently, as outlined in the Project document in Annex 1. This work would also include the review of existing guidance, within Codex and other international organizations, to help build a transparent, connected structure for safer food as well as better food security that encourages and enables interoperability between different systems and platforms.