

# codex alimentarius commission

FOOD AND AGRICULTURE  
ORGANIZATION  
OF THE UNITED NATIONS

WORLD HEALTH  
ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel.: +39(06)57051 Telex: 625825-625853 FAO I E-mail: Codex@fao.org Facsimile: +39(06)5705.4593

---

**Agenda Item 10**

**CX/ASIA 99/11-Add.1  
CRD 3**

## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

### **CODEX COORDINATING COMMITTEE FOR ASIA**

#### **Twelfth Session**

**Chiang Mai, Thailand, 23 - 26 November 1999**

### **CONSUMER PARTICIPATION IN FOOD STANDARDS SETTING AT THE CODEX AND NATIONAL LEVEL**

#### **COMMENTS FROM CONSUMERS INTERNATIONAL**

Consumers International welcomes paper CX/ASIA 99/11 on the involvement of consumers in the work of Codex and the continued commitment this represents to meet the objectives for improving consumer participation, as originally set out in the Medium-term programme of work approved in 1993, reaffirmed subsequently at the 22<sup>nd</sup> session of the Codex Alimentarius Commission in 1997 and the 23<sup>rd</sup> session of the CAC in 1999 as well as in the Medium-term plan for 1998 to 2002.

Ever since Consumers International (formerly known as the International Organisation of Consumers Unions) was first granted observer status in Codex in the early 1970s, it has participated in many Worldwide General Subject Committees and Regional Coordinating Committees. It has done this with the support of its head office in London and its regional offices for Latin America and the Caribbean, Africa, Asia and the Pacific and its programmes for Developed Economies and Economies in Transition.

With the establishment of the World Trade Organisation and the breaking down of trade barriers, issues of food safety and food trade have assumed an unprecedented importance for consumers worldwide. With the free movement of foods from country to country, there is concern that foods produced in one country must meet the standards of safety of the importing country. Codex Alimentarius therefore plays the indispensable role in ensuring that consumers receive products that are of minimum acceptable quality, risk free and not hazardous to human health.

In view of the breaking down of trade barriers and Codex's increasing influence as the global food standards setting body, it is essential that there is significant consumer participation within Codex processes. Codex committees both national and international will certainly benefit from the involvement of consumer organisations as they will ensure that consumer interests are safeguarded.

The 23<sup>rd</sup> Session of the Codex Alimentarius Commission in fact expressed full support for efforts to enhance participation of consumer organisations in the development of food standards and also in relation to Codex at the national level. There was agreement that it was highly desirable for consumers to participate in training activities designed to establish or strengthen Codex Contact Points or National Codex Committees.

Consumers International has had more than 20 years of experience in terms of its involvement in meetings of the Codex Commission and the Codex Committees on Pesticides Residues, Food Labelling, Nutrition and Foods for Special Dietary Uses, Food Hygiene, Residues of Veterinary Drugs in Foods, Food Additives and Contaminants, Food Export and Import Inspection and Certification Systems, General Principles and the Regional Coordinating Committees. It has promoted the setting up of

national Codex Committees and provides training to its membership to enable it to improve its capacity to effectively participate in national, regional and international Codex committees.

In this context, Consumers International Regional Office for Asia and the Pacific in fact organised a Regional Seminar on Codex in Bangkok, in cooperation with the Government of Thailand, from 26 – 28 August 1999 to strengthen the Asia Pacific membership's understanding of how Codex operates and the avenues for consumer participation; build skills on effective lobbying and campaigning as regards the issues at stake in Codex; and map out a consumer strategy of engagements with Codex at the global, regional and national levels. This regional training activity, the first of its kind organised for members in the Asia Pacific region successfully demonstrated the keen interest of consumer groups in the region to become better involved in Codex processes at the national, regional and international levels. This was evidenced by the detailed action plans drawn up by members in order to become involved in Codex processes particularly at the national level. Members have since followed up on these action plans. For example two consumer groups in India and one in Nepal have contacted their National Codex Contact Point requesting participation in the next national Codex Committee meeting while a consumer group in Malaysia has been invited to participate at the next national Codex Committee meeting.

In response to the request by Codex on the state of consumer participation in Codex work, Consumers International Regional Office for Asia and the Pacific carried out a survey of its membership in the Asia Pacific region to determine their level of involvement in national Codex processes in their countries. A questionnaire was circulated to 79 members in 23 countries. The questionnaire was designed to gather information on existing national Codex Consultation Systems with a view to gauge consumer influence and involvement with the Codex Alimentarius.

## **MAIN POINTS OF THE ASIA PACIFIC REGIONAL SURVEY ON NATIONAL CODEX CONSULTATION SYSTEMS**

### **Contacts with National Codex Contact Points and National Codex Committees**

- Almost 86% of the respondents indicated that they had contact with the National Codex Contact Point or NCCP in their respective countries.
- Members reported the existence of a National Codex Committee or NCC in almost half of the 13 countries responding to the survey. Some of the respondents indicated that their countries were just in the process of setting up the NCC.
- In those countries that already had the NCC, members comprised mainly of a combination of representatives from the relevant government ministry/department, food industry, the trading sector, consumer organisations, scientific and other organisations as well as individuals.
- Not all the respondents know how often the NCC met. In some countries the frequency of NCC meetings seemed to depend on the urgency of the matter to be discussed. In Australia the NCC meets twice a year while a member in New Zealand indicated that it was normally invited to attend NCC meetings which were held just prior to and after International Codex meetings.

### **Satisfaction with the consultation process**

The Asian Regional Guidelines (Draft Guidelines for Codex Contact Points and National Codex Committees) clearly state that as consumers are the ultimate beneficiaries or victims of any changes to food standards, it is not only reasonable but essential that they be given an opportunity to participate in the consultative process. Participation in the National Codex Committee is a way of ensuring that consumers are not overlooked during consideration of any food standards, food safety and consumer protection issues. The survey however found that:

- Of the 13 countries responding to the survey, one third indicated that consumer groups were invited to attend meetings of the NCC. These countries were Australia, India, Indonesia and Malaysia. In these countries there was a better level of involvement by consumer groups in Codex processes compared to the other countries largely due to the efforts made by these groups to cultivate relationships with their NCCs.
- A little more than a third of respondents reported not knowing which Codex Committee their NCCP is interested in.

- There was a clear need for more involvement by consumer groups with their respective NCCP. Presently it is only groups in China, India, Indonesia, New Zealand and Samoa which indicated that their NCCP listens to their viewpoints. The respondent from Fiji said that its views were only recognised after a recent consumer awareness workshop. While the NCCP in Australia recognises the views of the consumer group there, in actual fact, policies are not necessarily made with regards to consumer interests and welfare. This view was shared by the respondent from Malaysia.
- Respondents from China, Nepal and Samoa were clearly of the opinion that the NCCP in their respective countries was sympathetic to consumer interests while the Indian, Malaysian and Indonesian consumer groups were uncertain of this.

One respondent summed it up when it said, “Yes and No depending on the issues. They support us when they feel the benefits like changes in certain existing practices on labelling, enforcement of law.”

The rest of the respondents were very clearly of the view that the NCCP was not sympathetic to consumer interests.

### **Influence of the food industry on national Codex processes**

- In 10 out of the 13 countries responding to the survey, the NCCP had significant contact with the food industry indicating that it was in a good position to influence the NCCP. The other three countries in the survey were not aware of any particular relationship.

### **Awareness of consumer groups about the Codex decision making process at national level**

- In order to contribute effectively at Codex, consumer groups must be aware of the Codex decision making process at national level. The present level of awareness of consumer groups about this process leaves a lot to be desired. Of the 16 respondents in this survey only the respondents from Australia and India were aware of the process involved in evolving a national position on any particular Codex item.

### **Codex papers**

- Five of the 16 respondents said that they generally receive all Codex documents two months ahead of a Codex meeting while four said that Codex papers were not necessarily received two months ahead of the meeting. Papers in fact arrive from between a month to several days prior to a meeting.

One consumer group commented, “The Codex Secretariat tries to get papers to the Codex Contact Point on time but is not always successful. However the Internet and CAC website now makes access to these quicker.”

- Only about 38% of respondents stated that Codex documents are made available to all members of the NCC. The respondent from Japan was the only one who stated that documents are also made available to public interest groups while most of the other respondents clearly said that these documents were not sent to public interest groups.

### **Representation and Influence in Codex processes**

- In 38% of cases the NCCP was agreeable to including consumer representatives in their national delegations to Codex meetings.

“We can be included in the national delegation but only on condition that we support our own travel and other expenses,” was the response of some of the consumer groups.

- Consumer groups could not fully participate in the national Codex process for many reasons. The most pressing seemed to be a lack of finances and information. Another important factor was the lack of trained personnel with specialist knowledge of Codex issues.

## **IN SUMMARY**

The survey clearly demonstrated that there are real differences in the degree of involvement by consumer groups in national Codex processes judging from the limited involvement of groups in meetings of the National Codex Committee, lack of knowledge by consumer groups about not only the existence of National Codex Committees but also of the frequency of NCC meetings, the types of Codex Committees and which of these were of interest to their NCCs. There was a clear need to strengthen the relationship between NCCs and consumer groups.

## **RECOMMENDATIONS FOR CONSIDERATION BY THE COMMISSION**

Consumers International offers the following additional comments to the recommendations made in CX/ASIA 99/11, in order to ensure continued progress on improving consumer participation in Codex matters.

- Develop a checklist of measurable objectives to assess consumer participation in Codex work at the national and international levels

The recently convened Regional Seminar on Codex held in Bangkok, Thailand from 26 – 28 August 1999 in fact called upon the Commission to initiate a mechanism to monitor and measure achievement of objectives to assess consumer participation in Codex work at the national level. Members from the region should encourage greater participation by legitimate consumer organisations at the national level. A report card on progress made on this point could be presented at every meeting of the Commission.

Consumers International has evolved a criteria to identify legitimate consumer organisations. Such consumer NGOs are active exclusively on behalf of the interests of the consumer, not-for-profit in character and independent from business and industry and party politics. This criteria can assist governments in identifying the correct pattern for the Codex dialogue at the national level and ensure just representation of consumer viewpoints in Codex affairs.

In CAC/LIM 6 (1999) Consumers International indicated its support for the proposed draft guidelines for such a checklist.

Consumers International reiterates its support for the proposed draft guidelines for this checklist.

- Development of guidelines or models for enhancing consumer participation in Codex and food standards work at the national and international levels

Consumers International view this as a very serious issue requiring immediate action. The Consumers International Asia Pacific Regional Survey on Codex Consultation Systems at the National Level clearly demonstrated that there are real differences in the degree of involvement by consumer groups in national Codex processes: deficiencies in the degree of involvement of groups in meetings of the National Codex Committee; deficiencies in knowledge by consumer groups about not only the existence of National Codex Committees but also the frequency of NCC meetings, the types of Codex Committees and which of these were of interest to their NCCs.

The Consumers International Regional Seminar on Codex in fact raised this issue with the Secretariat of the Codex Coordinating Committee of Asia drawing its attention to the results of the Asia Pacific Regional Survey on Codex Consultation Systems at the National Level. As the Secretariat of the CCC for Asia is currently based in Thailand, the Seminar called upon it to include consumer representatives from Thailand in national Codex processes as this is not the current practice there.

In CAC/LIM 6 (1999) Consumers International suggested that further clarification and guidelines based on 'best practice' could be achieved through CCGP in consultation with the Codex Regional Committees. Consumers International reiterates this and reaffirms that much can be gained by further elaboration of guidelines for enhancing consumer participation in national consultations on Codex matters.

- Identify funds to support expanded participation of legitimate consumer organisations at the national and international level in Codex - any resources available to Codex should be directed first to developing Member countries of the Commission

Lack of financial resources is a serious factor limiting improvements in Codex Consultation processes and requires immediate attention from national governments and the Codex Secretariat.

- Collaboration with national and international consumer organisations to improve the dissemination of Codex information to consumers

In CAC/LIM 6 (1999) Consumers International suggested that improved communications between all parties would encourage better coordination and effectiveness of dissemination of Codex information. Consumers International reaffirms that:

- Where conferences are being sponsored by FAO/WHO or national governments, Consumers International and national-level consumer NGOs could be notified and invited, and their participation funded, such as workshops prior to Codex Coordinating Committee for Asia which are funded by FAO.
- Consumers International having identified specific training needs from members could liaise with FAO/WHO, national governments and its members on coordinated activities. When Consumers International's Regional Office for Asia and the Pacific organised its Regional Seminar on Codex in Bangkok, Thailand from 26 – 28 August 1999 it first identified the training needs of its membership in the region. The seminar programme was then designed based on these needs and participation from FAO was integral to the eventual success of this seminar. The Thai Industrial Standards Institute which is the National Codex Contact Point for Thailand and the base of the Secretariat of the Codex Coordinating Committee for Asia was co-hosted the seminar with the Office of the Consumer Protection Board of Thailand.
- The Codex web pages could have links with other Codex-related events or workshops.
- Inviting legitimate consumer organisations to participate in national, sub-regional or regional workshops and seminars relevant to Codex matters

Consumers International has already initiated a project to increase the participation of consumer groups in international Codex work through building the capacities and expertise of its members particularly in developing countries. In implementing this project, Consumers International has already carried out 2 regional training activities in Asia and the Pacific and in Africa.

National governments in the Asia Pacific region could be urged by the Secretariat of the Coordinating Committee for Asia to include consumers groups participation in their training sessions. Consumers International could work with the Secretariat by:

- (i) providing them with a list of 80 consumers groups in 23 countries in the Asia Pacific region. These groups could be invited to attend Codex training workshops.
  - (ii) CI ROAP could coordinate with FAO/WHO and the host country of the CCC for Asia (currently Thailand) on identifying specific training needs of consumer groups in the region and identify ways of addressing them.
- Regional Coordinating Committees to provide a forum for the exchange of experiences on the ways and means of developing consumer input into National Codex Committees and Contact Points.

Consumers International fully supports the above recommendation and would be able to contribute to this process through the participation of its members in the region. The Consumers International Asia Pacific Regional Survey on Codex Consultation Systems at the National Level clearly demonstrated serious deficiency in the present level of awareness of consumer groups on the national Codex decision making processes. One way of taking this forward would be for the Secretariat to ask national governments to solicit the opinions of consumer groups on ways and means to improve consultation and input into National Codex Committees and Contact Points. National governments could send out a circular letter to consumer groups with specific questions related to this.

## **CONCLUSION**

Consumers International is committed to working in partnership with the Secretariat of the CAC, FAO/WHO, Codex Coordinating Committee for Asia and national governments to facilitate and ensure that the objectives set out in the recommendations are achieved.

Particularly since the initiation of its project on increasing consumer participation in the setting of international standards, Consumers International has committed resources to involve its members more in international Codex work. Regional training workshops have been conducted while more are in the process of being implemented; there is increased human resource commitment to the work on Codex as well as increasing participation and interest by its members on the work on Codex.

In order to ensure that there is consumer participation within national Codex processes the efforts made by Consumers International to increase the capacity of its members in the Asia Pacific region should be matched by efforts from national governments, FAO/WHO, and the Codex Coordinating Committee for Asia. Consumers International hopes that the current support shown by the Codex Coordinating Committee for Asia in efforts to improve consumer involvement and participation in Codex will not just continue but expand and strengthen.