

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda 2a

FFP/34 CRD/8

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS

Thirty-fourth Session

Ålesund, Norway, 19 – 24 October 2015

MATTERS REFERRED TO THE COMMITTEE BY THE CODEX ALIMENTARIUS COMMISSION AND OTHER CODEX COMMITTEES

Comments of Brazil, European Union, Kenya, Nigeria, Senegal and African Union

Codex Strategic Plan 2014 - 2019

EUROPEAN UNION

Activity 1.1.1
Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes. This activity is relevant to all Codex Committees including the CCFFP.</i> Does the Committee use any specific criteria for standards development? <i>No, the Committee applies the priority setting criteria laid down in Procedural Manual, section criteria for the establishment of work priorities, and the decision-making criteria for the development of standards and guidelines laid down in this manual, particularly in the section 'procedures for the elaboration of Codex standards and related texts'. Does the Committee intend to develop such criteria? <i>The EUMS fail to identify any specific need that would justify specific decision-making and priority-setting criteria for the CCFFP works and would be of the opinion to continue to refer to the general ones laid down in the Procedural Manual.</i></i>
Activity 1.2.1
Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes, as emerging issues could be related to issues under the remit of the CCFFP.</i> How does the Committee identify emerging issues and members needs? Is there a systematic approach? Is it necessary to develop such an approach? <i>Emerging issues can be reported by the members directly to the CCFFP or by other Committees. This process then leads to the revision or the development of Standards and Guidelines. Unless there is evidence of some failure in this process, the EUMS do not see benefits in the development of a systematic approach for the CCFFP.</i>
Activity 2.1.1
Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes.</i> Does the committee request scientific advice in course of its work, how often does it request such advice? <i>For certain topics CCFFP requests scientific advice (e.g. biotoxins, histamine). The periodicity of such request is difficult to establish.</i> Does the committee always use the scientific advice, if not, why not? <i>The Committee uses the scientific advice it has requested, but not all the subjects handled by the Committee need scientific advice. When scientific aspects are related to horizontal issues such as contaminants, food additives, the Committee refer to the relevant Committee/s as laid down in the Procedural Manual..</i>
Activity 2.1.2
Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes. Scientific and technical expertise is often required to justify the positions advanced by the Members.</i> How do members make sure that the necessary scientific input is given into country positions and that the composition of the national delegation allows to adequately present and discuss this position? <i>It is up to each Member to organise and manage the necessary scientific input with a view to present its positions.</i>

<p>What guidance could be given by the Committee or FAO and WHO? <i>The EUMS do not believe that a specific guidance is needed on this point.</i></p>
<p>Activity 2.1.3</p> <p>Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes. In its capacity of risk manager, the Committee should ensure that all relevant factors in exploring risk management options are considered. Furthermore, this is indeed a prerequisite for Codex standard development.</i> How does the Committee ensure that all relevant factors have been taken into account when developing a standard and how are these documented? <i>The Procedural Manual already establishes Working Principles for Risk Analysis which stipulate that risk management should follow a structured approach including preliminary risk management activities, evaluation of risk management options, monitoring and review of the decision taken. These principles requests a transparent, consistent and fully documented risk management process, and a presentation of the conclusion of the risk assessment before making final proposals or decisions on the available risk management options. The Committee should therefore recall the importance of applying consistently these principles.</i></p>
<p>Activity 2.1.4</p> <p>Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes. However, currently this is mainly done through the publication of standards and related texts on the Codex website. The development of a communication strategy would have a positive impact on this activity.</i> When taking a risk management decision, does the committee give guidance to members how to communicate this decision? Would more consideration of this be helpful to members? <i>No. Once the Codex general communication strategy will be developed, more consideration could be given to this issue.</i></p>
<p>Activity 3.1.5</p> <p>Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes, the promotion of effective participation of developing countries is of interest for all Committees, including CCFFP.</i> Is the use of official languages in working groups of the committee sufficient? <i>The EUMS would recommend using as many languages as possible in WGs in order to enhance participation of members.</i> What are the factors determining the choice of languages? <i>This mainly depends on the Member/s chairing the WG.</i> How could the situation be improved? <i>The EUMS are open to suggestions on how to improve the situation. A suggestion could be to promote co-hosting arrangements by countries with different languages.</i></p>
<p>Activity 3.2.3</p> <p>Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes, the promotion of such capacity development programs is of interest for all Committees, including CCFFP.</i> Does the Committee organize technical capacity activities or other activities in the margins of Committee sessions? If yes – how many and with which topics have been organized in the past. <i>The EUMS believe that any capacity building activity should be coordinated by the parent organisations in order to avoid inconsistencies and duplication of work.</i> If no – could this be useful and what topics could be addressed? <i>The EUMS are open to any initiative in this area.</i></p>
<p>Activity 4.1.4</p> <p>Question to the Committee: Is this activity relevant to the work of the Committee? <i>Yes. The EUMS strongly believe that it is essential to maintain consensus-based decision making in the framework of Codex Alimentarius. This is necessary to ensure the legitimacy, credibility and worldwide acceptance of Codex standards. The obligation to strive for consensus-based decision making is clearly spelled out in Rule XII of the Rules of Procedure of the CAC.</i> <i>Furthermore, every possible effort should be made to ensure the timely distribution of documents.</i> Does the Committee have a mechanism in place to ensure timely distribution of documents? What could be done to further improve the situation? <i>The requirement for timely distribution of documents already exists and is included in the Procedural Manual. However, all members should be more disciplined in ensuring its implementation.</i></p>
<p>Activity 4.1.5</p>

Question to the Committee:

Is this activity relevant to the work of the Committee?

CCFFP already schedules Work Group meetings in conjunction with Committee meetings when necessary.

Does the Committee hold physical working groups independent of Committee sessions? If yes – why is this necessary?

The EUMS believe that in general the system in place today, e-working groups combined with physical working groups organised in conjunction with Committee sessions, is sufficient to ensure the efficiency of the work of the Committee. There does not seem to be any added value of working groups independent of Committee sessions, unless it is fully justified by specific needs. The EUMS are rather concerned about the additional resources that such organisation would require.

Activity 4.2.1**Question to the Committee:**

Is this activity relevant to the work of the Committee?

Yes. Concerning the consensus-based approach in Codex, please see the reply to point 4.1 above. It is the role of the chair to explore all possible means to reach consensus before taking any final decision on progressing a standard on the basis of a vote.

Are there problems with finding consensus in the Committee? If yes – what are the impediments to consensus? What has been attempted and what more could be done?

Problems may arise in this Committee, as well as in any other Committees. All efforts should be made to ensure that all decisions of the Committee are taken on the basis of consensus, or the standard should not be forwarded to the CAC.

KENYA**Appendix II 2014-2019 Strategic Plan Activities for which “all committees” are responsible**

1.1.1: Issue: Establish new and review existing Codex standards, based on priorities of the CAC

Question to the Committee: Is this activity relevant to the work of the Committee? **YES**

Does the Committee use any specific criteria for standards development? Does the Committee intend to develop such criteria?

POSITION: Yes: to reach the goal of protecting consumer health and for fair trade and transparency. The committee must update and develop standards based on scientific evidences.

1.2.1: Issue: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.

Question to the Committee: Is this activity relevant to the work of the Committee? **YES**

Does the Committee use any specific criteria for standards development? Does the Committee intend to develop such criteria?

1.2.2. Issue: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.

Question to the Committee: Is this activity relevant to the work of the Committee? **YES**

How does the Committee identify emerging issues and member's needs? Is there a systematic approach? Is it necessary to develop such an approach?

POSITION (Issue 1.2.1 & 1.2.2): Based on existing FAO/ WHO guidelines, countries are to report emerging issues and members needs on food safety. It is necessary to develop such an approach to ensure effective circulation of data.

2.1.2: Issue: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the committee request scientific advice in course of its work, how often does it request such advice. Does the committee always use the scientific advice, if not, why not?

POSITION: The committee do request for scientific advice in the course of its work. Sometimes they set up scientific advisory group -physical or electronic working group. It request for such advices as the need arise. Committee use scientific advice but when there is no consensus opinion, member States are asked to use their own standards.

2.1.3: Issue: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

How do members make sure that the necessary scientific input is given into country positions and that the composition of the national delegation allows to adequately present and discuss this position? What guidance could be given by the Committee or FAO and WHO?

POSITION: This is the responsibility of the National CODEX Committee of each country. The national committee must be organized through the **NCCP** to ensure that all relevant expert opinion are included in the country's position and encourage engagement of scientific and technical expertise. The scientific or FAO and WHO should provide **TECHNICAL** support.

2.1.3: Issue: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Ensure that all relevant factors are fully considered in exploring risk management options in the context of Codex standard development Is this activity relevant to the work of the Committee? **YES**

How does the Committee ensure that all relevant factors have been taken into account when developing a standard and how are these documented?

POSITION: The committee must ensure identification and documentation of all Risk analysis during elaboration of CODEX Standards

2.1.4: Issue: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

When taking a risk management decision, does the committee give guidance to members how to communicate this decision? Would more consideration of this be helpful to members?

POSITION: The **FAO/WHO scientific advisors** advises the **CCFFP committee** and gives guidance to members on how to communicate decisions to national codex contact points and also post on the CAC website.

3.1.5: Issue: Increase the effective participation of developing countries in Codex.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Is the use of official languages in working groups of the committee sufficient? What are the factors determining the choice of languages? How could the situation be improved?

POSITION: The use of official languages in working groups of the committee is not sufficient because there are some words/sentences that need to be translated to the official language of the experts. For more efficiency of the work of the Committee it is important to have the translations of documents readily available in all languages. The choice of languages is the fact that most of reference materials such as scientific journals and research results are in English.

3.2.3: Issue: Promote capacity development programs that assist countries in creating sustainable national Codex structures.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the Committee organize technical capacity activities or other activities in the margins of Committee sessions? If yes– how many and with which topics have been organized in the past. If no – could this be useful and what topics could be addressed?

Comment:

Several projects support countries in capacity building to improve participation of delegates in Codex sessions. The committee does not organize technical capacity building activities or other activities in the margins of Committee sessions. It will be useful for effective participation of delegates to organize training in Codex procedures, risk analysis, etc.

4.1.4: Issue: Strive for an effective, efficient, transparent, and consensus based standard setting process.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the Committee have a mechanism in place to ensure timely distribution of documents? What could be done to further improve the situation?

Comment:

The committee has a mechanism in place to ensure timely distribution of documents, however not all documents are distributed or are available at the CAC website.

4.1.5: Issue Strive for an effective, efficient, transparent, and consensus based standard setting process.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the Committee hold physical working groups independent of Committee sessions? If yes – why is this necessary?

Comment:

Yes. The PWG helps to come up with a common position which gives the chair an easy time and thus shortens the time spent on that specific subject.

4.2.1: Issue: Enhance capacity to arrive at consensus in standards setting process.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Are there problems with finding consensus in the Committee? If yes – what are the impediments to consensus? What has been attempted and what more could be done?

Comments:

Yes. Impediments to consensus are because of strong partisan positions for members. What has been attempted to be done is by training committees chairs on how to guide the meetings with fairness, neutrality and help reach consensus.

NIGERIA AND AFRICAN UNION

Appendix II 2014-2019 Strategic Plan Activities for which “all committees” are responsible

1.1.1: Issue & Rationale: Establish new and review existing Codex standards, based on priorities of the CAC

Question to the Committee: Is this activity relevant to the work of the Committee? **YES**

Does the Committee use any specific criteria for standards development? Does the Committee intend to develop such criteria?

POSITION: Yes: to reach the goal of protecting consumer health and for fair trade and transparency. The committee must update and develop standards based on scientific evidences.

1.2.1: Issue & Rationale: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.

Question to the Committee: Is this activity relevant to the work of the Committee? **YES**

Does the Committee use any specific criteria for standards development? Does the Committee intend to develop such criteria?

1.2.2. Issue & Rationale: Proactively identify emerging issues and Member needs and, where appropriate, develop relevant food standards.

Question to the Committee: Is this activity relevant to the work of the Committee? **YES**

How does the Committee identify emerging issues and member’s needs? Is there a systematic approach? Is it necessary to develop such an approach?

POSITION (Issue 1.2.1 & 1.2.2): Based on existing FAO/ WHO guidelines, countries are to report emerging issues and members needs on food safety. It is necessary to develop such an approach to ensure effective circulation of data.

2.1.2: Issue & Rationale: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the committee request scientific advice in course of its work, how often does it request such advice. Does the committee always use the scientific advice, if not, why not?

POSITION: The committee do request for scientific advice in the course of its work. Sometimes they set up scientific advisory group -physical or electronic working group. It request for such advices as the need arise. Committee use scientific advice but when there is no consensus opinion, member States are asked to use their own standards.

2.1.3: Issue & Rationale: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

How do members make sure that the necessary scientific input is given into country positions and that the composition of the national delegation allows to adequately present and discuss this position? What guidance could be given by the Committee or FAO and WHO?

POSITION: This is the responsibility of the National CODEX Committee of each country. The national committee must be organized through the Focal Points to ensure that all relevant expert opinion are included in the country's position and encourage engagement of scientific and technical expertise. The Committee or FAO and WHO should provide support.

2.1.3: Issue & Rationale: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Ensure that all relevant factors are fully considered in exploring risk management options in the context of Codex standard development. Is this activity relevant to the work of the Committee? **YES**

How does the Committee ensure that all relevant factors have been taken into account when developing a standard and how are these documented?

POSITION: The committee must ensure identification and documentation of all Risk analysis during elaboration of CODEX Standards

2.1.4: Issue & Rationale: Ensure consistent use of risk analysis principles and scientific advice.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

When taking a risk management decision, does the committee give guidance to members how to communicate this decision? Would more consideration of this be helpful to members?

POSITION: The Committee gives guidance to members on how to communicate decisions through their documents and laid down FAO/WHO standards/ publication of such decision. More consideration would however be helpful.

3.1.5: Issue & Rationale: Increase the effective participation of developing countries in Codex.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Is the use of official languages in working groups of the committee sufficient? What are the factors determining the choice of languages? How could the situation be improved?

POSITION: The use of official languages in working groups of the committee is not sufficient because there are some words/sentences that need to be translated to the official language of the experts. For more efficiency of the work of the Committee it is important to have the translations of documents readily available in all languages. The choice of languages is the fact that most of reference materials such as scientific journals and research results are in English.

3.2.3: Issue & Rationale: Promote capacity development programs that assist countries in creating sustainable national Codex structures.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the Committee organize technical capacity activities or other activities in the margins of Committee sessions? If yes– how many and with which topics have been organized in the past. If no – could this be useful and what topics could be addressed?

POSITION: Several projects support countries in capacity building to improve participation of delegates in Codex sessions. The committee does not organize technical capacity building activities or other activities in the margins of Committee sessions. It will be useful for effective participation of delegates to organize training in Codex procedures, risk analysis, etc.

4.1.4: Issue & Rationale: Strive for an effective, efficient, transparent, and consensus based standard setting process.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the Committee have a mechanism in place to ensure timely distribution of documents? What could be done to further improve the situation?

POSITION: The Committee has a mechanism in place to ensure timely distribution of documents but needs enlarge the secretariat to ensure prompt translation and distribution of all the documents in all the languages used by CODEX.

4.1.5: Issue & Rationale: Strive for an effective, efficient, transparent, and consensus based standard setting process.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Does the Committee hold physical working groups independent of Committee sessions? If yes – why is this necessary?

POSITION: YES. It is necessary for better preparation for the plenary sessions.

4.2.1: Issue & Rationale: Enhance capacity to arrive at consensus in standards setting process.

Question to the Committee:

Is this activity relevant to the work of the Committee? **YES**

Are there problems with finding consensus in the Committee? If yes – what are the impediments to consensus? What has been attempted and what more could be done?

POSITION: Yes because of varied opinion; country's interests and variation in risk analysis exposition.

SENEGAL

Annexe II : Activités du Plan stratégique 2014-2019 dont "tous les comités" sont responsables

I.I.I: Établir de nouvelles normes et revoir les normes existantes du Codex sur base des priorités de la CAC

Questions posées au comité

- Cette activité est-elle en rapport avec les travaux du Codex? **OUI**
- Le Comité utilise-t-il des critères spécifiques pour établir des normes? Le Comité a-t-il l'intention d'élaborer de tels critères?

COMMENTAIRES DU SENEGAL : Le Comité utilise des critères scientifiques pour établir les normes. Les preuves scientifiques sont les principales références pour atteindre un consensus permettant l'application des normes au sein des différents pays avec le double objectif de protéger les consommateurs et assurer la transparence dans le commerce.

1.2.1: Identifier de manière proactive les enjeux émergents ainsi que les besoins des membres et, le cas échéant, élaborer les normes alimentaires pertinentes.

Questions posée au Comité:

- Cette activité est-elle en rapport avec les travaux du Comité? : **Oui**
- Est-ce que le Comité utilise des critères spécifiques pour établir des normes? Est-ce que le Comité a l'intention d'élaborer de tels critères?

COMMENTAIRES DU SENEGAL : Les seuls critères connus pour l'établissement des normes sont d'abord l'expression des besoins par les pays et la justification technologique et scientifique. Le reste du travail se fait selon les directives du manuel du Codex.

1.2.2 : Identifier de manière proactive les enjeux émergents et, le cas échéant, établir les normes alimentaires pertinentes.

Questions posées au Comité:

- Cette activité est-elle pertinente aux travaux du Comité? **OUI**
- Comment le Comité détermine-t-il les enjeux émergents et les besoins des membres? Existe-t-il une approche systématique? Est-il nécessaire d'élaborer une telle approche?

COMMENTAIRES DU SENEGAL : Sur base des directives existantes de la FAO/OMS, les pays doivent signaler les problèmes émergents et les besoins des membres en matière de sécurité sanitaire des aliments. Il est nécessaire d'élaborer une telle approche afin d'aborder les problématiques émergentes qui n'ont plus de frontières. L'élaboration de cette nouvelle approche garantira un partage de l'information, une circulation plus efficace des données et des résultats de recherche. Cette nouvelle approche permettra la prise en charge des nouveaux cas et facilitera l'adhésion des pays lors de l'élaboration des nouvelles normes. Les normes seront adoptées plus rapidement et leur mise en œuvre prendra moins de temps.

2.1.2: Assurer une utilisation cohérente des principes d'analyse des risques et des avis scientifiques.

Questions posées au Comité:

- Cette activité est-elle en rapport aux travaux du Comité? **OUI**
- Est-ce que le Comité demande des avis scientifiques au cours de ses travaux, combien de fois demande-t-il de tels avis. Est-ce que le Comité utilise toujours les avis scientifiques, si non, pourquoi?

COMMENTAIRES DU SENEGAL : Le comité demande des avis scientifiques au cours de ses travaux. Parfois, des groupes consultatifs scientifiques – groupe de travail physique ou électronique, sont formés. Il demande de tels avis en cas de besoin. Le comité utilise l'avis scientifique mais, lorsqu'il n'y a pas de consensus, les États membres sont priés d'utiliser leurs propres normes.

2.1.3: Assurer une utilisation cohérente des principes d'analyse des risques et des avis scientifiques.

Questions posées au Comité:

- Cette activité est-elle en rapport avec les travaux du Comité? **Oui**
- Comment est-ce que les membres s'assurent que l'apport scientifique nécessaire est pris en compte dans les positions des pays et que la composition de la délégation nationale permet de présenter ainsi que de discuter de manière adéquate cette position? Quelles orientations pourraient être données par le Comité ou par la FOA et l'OMS?

COMMENTAIRES DU SENEGAL : Cela est de la responsabilité du Comité national du Codex de chaque pays. Le comité national doit être organisé à travers le point focal afin de s'assurer que tous les avis pertinents d'experts sont inclus dans la position du pays et il doit faciliter l'engagement de l'expertise scientifique et technique. Le Comité ou la FAO et l'OMS pourrait fournir un appui et recommander aux pays de veiller à l'inclusion dans les délégations nationales des personnes ressources ayant compétence dans les domaines.

2.1.3 Problème & justification: Assurer une utilisation cohérente des principes d'analyse des risques et des avis scientifiques.

Questions posée au Comité:

- S'assurer que tous les facteurs pertinents sont entièrement pris en compte dans l'exploration des options de gestion des risques dans le cadre de l'élaboration de la norme du Codex. Est-ce que cette activité est pertinente au travail du Comité? **Oui**
- Comment le Comité s'assure-t-il que tous les facteurs pertinents ont été pris en compte lors de l'élaboration d'une norme et comment cela est-il documenté?

COMMENTAIRES DU SENEGAL: Le Comité doit s'assurer de l'identification et de la documentation de toutes les analyses des risques effectuées au cours de l'élaboration des normes du Codex. Tous les travaux effectués en relation avec le sujet doivent être pris en compte. L'analyse de cette documentation permettra de dégager les orientations les plus pertinentes qui devront figurer dans la proposition de norme. Les avis scientifiques contradictoires s'il en existe doivent inciter la recherche de propositions consensuelles jusqu'à ce que les preuves scientifiques soient établies et reconnues par la communauté scientifique.

2.1.4: Assurer une utilisation cohérente des principes d'analyse des risques et des avis scientifiques.

Questions posée au Comité:

- Est-ce que cette activité est pertinente au travail du Comité? **Oui**
- Lors de la prise d'une décision sur la gestion des risques, est-ce que le comité donne des orientations aux membres sur la manière de communiquer cette décision? Est-ce qu'un examen plus approfondi de cet aspect serait plus utile aux membres?

COMMENTAIRES DU SENEGAL: Le Comité ne donne pas de conseils aux membres sur la manière de communiquer les décisions, il pourrait cependant le faire par le biais des documents et à travers les publications de la FAO et de l'OMS. Un examen plus approfondi serait utile, l'établissement de procédures pour aider les pays à adopter une démarche cohérente pour communiquer les décisions aurait un impact très positif sur les consommateurs et certains acteurs impliqués dans la sécurité sanitaire des aliments.

3.1.5: Renforcer la participation effective des pays en développement aux travaux du Codex.

Questions posée au Comité:

- Est-ce que cette activité est en rapport avec les travaux du Comité? **Oui**
- Est-ce que l'emploi des langues officielles dans les groupes de travail du comité est suffisant? Quels sont les facteurs qui déterminent le choix des langues? Comment pourrait-t-on améliorer la situation?

COMMENTAIRES DU SENEGAL: L'utilisation des langues officielles dans les groupes de travail du comité est insuffisante car les documents de travail ne sont pas disponibles dans la langue officielle des membres. Les normes requièrent une attention particulière dans leur rédaction pour éviter les amalgames, erreurs, redondances, etc. Seule l'utilisation de la langue officielle du pays permet de garantir une bonne compréhension des documents et par la suite une bonne contribution des pays et enfin leur adhésion aux décisions. Pour plus d'efficacité dans les travaux du Comité, il est important que la traduction des documents dans toutes les langues officielles soit disponible. Le choix des langues repose sur le fait que la plupart des documents de référence tels que les revues scientifiques et les résultats des recherches sont en anglais, mais le secrétariat du comité pourrait être renforcé pour assurer leur traduction.

3.2.3: Promouvoir les programmes de renforcement des capacités qui aident les pays dans la mise en place de structures nationales durables du Codex.

Questions posée au Comité:

- Est-ce que cette activité est en rapport avec les travaux du Comité? **Oui**
- Est-ce que le Comité organise des activités qui portent sur les capacités techniques ou d'autres activités en marge de ses sessions? Si oui – combien et sur quels thèmes ont porté les activités organisées auparavant? Si non – est-ce que cela serait utile et quels thèmes pourraient être abordés?

COMMENTAIRES DU SENEGAL: Plusieurs projets des partenaires soutiennent les pays dans le renforcement des capacités afin d'améliorer la participation des délégués aux sessions du Codex (PAN SPSO de l'UA BIRA, la FAO etc.) Le Comité n'organise pas des activités de renforcement des capacités techniques ni d'autres activités en marge de ses sessions. Il pourrait envisager d'appuyer les pays pour une meilleure participation des délégués. Ces formations sur l'organisation et le fonctionnement du Codex, les procédures, l'analyse des risques, etc. seraient d'une grande utilité pour les pays.

4.1.4: S'efforcer de mettre en place un processus efficace, efficient, transparent, et consensuel dans l'établissement des normes.

Questions posées au Comité:

- Cette activité est-elle en rapport avec les travaux du Comité? **Oui**
- Est-ce que le Comité dispose d'un mécanisme pour assurer la distribution des documents en temps opportuns? Que pourrait-t-on faire en vue d'améliorer davantage la situation?'

COMMENTAIRES DU SENEGAL: Le Comité dispose sur place d'un mécanisme de distribution des documents en temps opportuns mais il doit être renforcé pour permettre au secrétariat d'assurer la traduction et la distribution rapide de tous les documents dans toutes les langues utilisées par le CODEX.

4.1.5: S'efforcer de mettre en place un processus efficace, efficient, transparent et consensuel dans l'établissement des normes.

Questions posée au Comité:

- Cette activité est-elle en rapport avec les travaux du Comité? **Oui**
- Est-ce que le Comité dispose de groupes de travail physique en dehors de ses sessions? Si oui – pourquoi est-ce nécessaire?

COMMENTAIRES DU SENEGAL: Oui. Cela est nécessaire pour mieux préparer les séances plénières, le travail fait par les groupes de travail permet d'avancer plus efficacement et facilite l'adoption des textes, les consensus sont trouvés bien avant les sessions.

4.2.1: Améliorer la capacité en vue de parvenir à un consensus dans le processus d'établissement des normes.

Questions posées au Comité:

- Cette activité est-elle en rapport avec les travaux du Comité? **Oui**
- Y'a-t-il des difficultés pour parvenir à un consensus au sein du Comité? Si oui – quels sont les obstacles au consensus? Qu'a-t-on essayé pour y remédier et que pourrait-on faire davantage?

COMMENTAIRES DU SENEGAL: Oui, parce qu'il y'a des avis différents; des intérêts nationaux différents et une variation dans l'exposition aux risques selon les habitudes alimentaires. Donc un consensus ne pourra pas être facile à trouver. Ces difficultés pour parvenir au consensus font que le Codex est l'un des rares organes avec une approche aussi démocratique, mais aussi avec autant d'adhésion des pays du monde. Donc il convient de garder cette approche, cependant ; il faut améliorer le partage des données et des informations scientifiques, car une fois que les membres seront au même niveau d'information, les consensus seront plus faciles à atteindre et l'adoption des normes en sera facilitée.

Sampling plans in standards for fish and fishery products

NIGERIA AND AFRICAN UNION

Appendix III: Proposal from CCMAS35 on sampling plans for fish and fishery products

Standard for Live Abalone and for Raw, Fresh Chilled or Frozen Abalone for Direct Consumption or for Further Processing (CODEX STAN 312 – 2013)

8.6 Determination of the presence of viscera

Issue & Rationale: CCMAS35 noted that the sampling plan for determination of the presence of viscera should depend on whether it is a source of biotoxins and could be considered as a health issue or a quality defect and that whether or not viscera would be found depends on the technology used for processing. CCFPP should consider sampling plans for determination of the presence of viscera taking into account these

POSITION: Presence of viscera is a potential source of biotoxin and /or quality defects. This two should be considered separately.

1. Viscera as a quality defect (there is need to determine which percentage of viscera is acceptable.)
2. Viscera as a source of biotoxin (there is need to determine what quantity of viscera liberates the percentage of biotoxin that is not acceptable.).

8.7 Determination of parasites

Issue & Rationale: Attribute sampling plan, CAC/GL 50, Section 4.2, Table 10, using AQL 6.5% and acceptance number = 0. Standard for Fresh and Quick Frozen Raw Scallop Products (CODEX STAN 315-2014)

POSITION: The proposal is supported because the product is for direct consumption. In practice, it is difficult to have zero parasites in raw material. During processing with GMP, the final product may have zero parasites to protect consumer's health.

SENEGAL

Annexe III: Proposition sur CCMAS35 sur les plans d'échantillonnage pour les poissons et les produits de la pêche,

Norme pour les ormeaux vivants et pour les ormeaux crus et frais réfrigérés ou congelés destinés à la consommation directe ou à un traitement ultérieur (CODEX STAN 312 – 2013),

8.6 Détermination de la présence de viscères

COMMENTAIRES : Le Sénégal ne soutient pas cette proposition

JUSTIFICATIONS : La présence des viscères est une source potentielle de biotoxines et/ou de défauts de qualité. Ces deux paramètres devraient être étudiés séparément.

3. Les viscères en tant que défaut de qualité (il est nécessaire de déterminer quel pourcentage de viscères est acceptable.).
4. Les viscères en tant que source de biotoxines (il est nécessaire de déterminer quelle quantité de viscères libère le pourcentage de biotoxines qui est inacceptable.).

8.7 Détermination des parasites

COMMENTAIRES : Nous soutenons la proposition

JUSTIFICATIONS : Le produit est destiné à la consommation directe. En pratique, il est difficile de n'avoir aucun parasite dans les matières premières alors que durant la transformation avec l'application des BPF, BPH et du HACCP, le produit final peut avoir zéro parasite et cela est nécessaire pour protéger la santé des consommateurs.

Food Additives

BRAZIL

In response to CCFA, Brazil understands that the function of phosphates is stabilizer, since the definition of stabilizer is: a food additive, which makes it possible to maintain a uniform dispersion of two or more components, in this case, to avoid the water loss by exudation. So, Brasil proposes to change the function of phosphates to stabilizer.

EUROPEAN UNION

Codex Committee on Food Additives (CCFA) (46th Session)

The European Union (EU) takes note of the issue pointed out by the CCFA that phosphates INS 342(i), (ii) and INS 343 (i) – (iii) in the Standard for Fresh and Quick Frozen Raw Scallop Products were associated with functions of humectants or sequestrant, which were not listed in CAC/GL 36-1989 and that the use (i.e. technological effect) of INS 342 and 343 should be clarified.

The EU considers that in general the technological function of phosphates in frozen molluscs is "Humectant / Sequestrant". However, phosphates are very often used in combination and to achieve the best results a combination of phosphates acting as humectants, sequestrants and acidity regulators might be needed. It should be noted that the prevention of water losses due to freezing would not be achieved just by modifying the pH (i.e. by using acidity regulators only).

The EU does not have precise information about the use of INS 342 and 343 in foods falling within the standard CODEX STAN 315-2014. INS 342 is not authorised for use in the EU and to the EU's knowledge the use of INS 343 in frozen molluscs in the EU is limited. The Codex Members which use the mentioned additives should clarify their technological effect. The EU would like to note that both additives are currently associated with the acidity regulator functional class in CAC/GL 36-1989, therefore, the EU suggests that the heading of the table permitting the use of phosphates in CS 315-2014 (i.e. section 4.2) is revised to "Humectant / Sequestrant / Acidity regulator" unless it is demonstrated that INS 342 and INS 343 act as humectants or sequestrants. In the latter case the CAC/GL 36-1989 should be revised to associate the mentioned functional classes with INS 342 and INS 343.

NIGERIA AND AFRICAN UNION

15. CCFA46 Committee on Food Additives (CCFA) (46th and 47th Sessions) (CODEX STAN 166-1989).

Issue & Rationale: 15. CCFA46 further agreed to add a note to the provisions for phosphates in food category 09.2.2 "Frozen battered fish, fish fillets and fish products, including molluscs, crustaceans and echinoderms" of the GSFA to read: "At 400 mg/kg as phosphorous for use singly or in combination in breaded or batter coating in accordance with the Standard for Quick Frozen Fish Sticks (Fish Fingers), Fish Portions and Fish Fillets –Breaded or in Batter (CODEX STAN 166-1989).

POSITION: The use of phosphate was allowed for fish fillet, fish finger but not whole fish (fish with skin). The term fish product is too wide and must be taken out completely. The specifications for molluscs, crustaceans and echinoderms must be clearly spelt out.

SENEGAL

CCFA46 Comité sur les additifs alimentaires (CCFA) (46^{ème} et 47^{ème} sessions) (CODEX STAN 166-1989).

COMMENTAIRES DU SENEGAL: L'utilisation du phosphate a été autorisée pour les filets de poisson, les bâtonnets de poisson mais pas pour le poisson entier (le poisson avec la peau). Le terme produit de poisson est trop englobant, il pourrait entraîner l'inclusion de produits qui ne sont pas concernés par l'esprit de la norme, c'est pourquoi il doit être complètement supprimé. Les spécifications des mollusques, crustacés et échinodermes doivent être clairement énoncées.