



Agenda item 4

CRD 13
February 2016
ORIGINAL LANGUAGE ONLY

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-second Session

Melbourne, Australia, 6-12 February 2016

DRAFT PRINCIPLES AND GUIDELINES FOR THE EXCHANGE OF INFORMATION (INCLUDING QUESTIONNAIRES) BETWEEN COUNTRIES TO SUPPORT FOOD IMPORT AND EXPORT

Thailand would like to express our appreciations for efforts of the Electronic Working Group led by New Zealand, Brazil and Mexico for the preparation of the Draft Principles and Guidelines for the Exchange of Information (Including Questionnaires) Between Countries to Support Food Import and Export at Step 3

I) General comments

We agree with the document in principle. However, from our views the scope of information exchange should cover aspects other than National Food Control System (NFCS), for example organic foods or Halal foods, as Codex's work concerns both protecting consumers' health and ensuring fair practices in food trade including labelling and claim which are already included in NFCS.

II) Specific comment

However, we would like to propose our comments on specific sections of the document as follows.

1) Title of the document and foot note 1

For the word "food" in the title of the document and explanations in foot note 1 that describes as follows:

"¹ For the purposes of these guidelines, food shall be taken to include feed for food-producing animals."

We would like to request for clarifications that whether the document covers the information exchange for import and export of feed for food producing animal in feed trade. If it does, it is proposed that foot note 1 should be revised to be consistent with other Codex guidelines as follows:

"¹ For the purposes of these guidelines, food shall be taken to include feed for food-producing animals ***related to food safety***."

2) Section 1 – Introduction

- Paragraph 4

The document also covers feed for food producing animals, so Codex texts of particular relevance given in this paragraph should additionally include "Code of Practice for Good Animal Feeding (CAC/RCP 54-2004)".

3) Section 3 – Scope

- Paragraph 8

To be clear and consistent through the entire document, the word "a product" should be replaced by "a food product". So, this paragraph should read:

“8. These guidelines address situations where information exchange that may cover a **food** product or group of products prior to the initiation or maintenance of trade.”

4) Section 4 – Exchange of information and assessment

4.1) To avoid confusion in practice, paragraph 9 should be moved to be the second paragraph of Section 3 – Scope, meanwhile paragraph 10 should be moved to be the first paragraph of Section 6 – Process. As a result, Section 4 – Exchange of information and assessment is removed.

Therefore, these sections should read as follows:

“- Section 3 – Scope

8. These guidelines address situations where information exchange may be required products prior to the initiation or maintenance of trade.

9. Information exchange is justified when the risks posed risks, is required and the assurance is not able to be attained by other means.

~~Section 4 – Exchange of information and assessment~~

~~9 Information exchange is justified when the risks posed by the specific food product risks, is required and the assurance is not able to be attained by other means.~~

~~10 The competent authorities of the importing and exporting assessment of the relevant~~

- Section 6 - Process

Paragraph xx

The competent authorities of the importing and exporting countries, in the process of exchanging information and the associated assessment of the relevant component(s) of a NFCS, should:

a) not impose an outcome, a standard or a process in excess of what is being applied within the importing country without justification;

b) recognize that the relevant component(s) of NFCS may be designed and structured differently while still meeting the same objectives or outcomes;

c) recognize the official controls, assessments and approval mechanisms already in place in the exporting country;

d) focus on the relevant component(s) of the NFCS in place in the exporting country as they relate to the outcomes; and

e) involve only the level of detailed information that is essential to gain the necessary assurances with regard to food safety and fair practices in food trade as opposed to routinely requiring detailed information on specific food business operators.³

12. Where the necessity of exchanges of information and assessments has been by the competent authorities of the importing and exporting countries.”

4.2) paragraph 10, c)

Sub section c) of paragraph 10 that focuses on recognizing the official controls and assessments is not relevant with contexts of this document, so c) should be removed.

However, if c) cannot be deleted, it should be revised for more appropriateness and flexibility as follows:

“c) recognize **the concept of** the official controls, assessments and approval mechanisms already in place in the exporting country;”

5) Section 5 – Principles

- Paragraph 11 a)

In practice, it could be difficult, if it is needed to appoint a coordinating contact point, where multiple authorities are responsible in information exchange of import and export. So, for flexibility, an alternative should be allowed to apply other mechanisms for the coordination as appropriate. It is proposed that this section should be revised to read:

“a) Be between the relevant competent authorities of the exporting and importing countries. Where multiple authorities are involved a designated coordinating contact point should be appointed **or other coordination mechanisms should be applied.**”

6) Section 6 – Process

- Paragraph 12

This paragraph should be revised for appropriateness as follows:

“12. Where the necessity of exchanges of information and assessments has been established, in accordance with paragraph xx above and are required to trade in food, ~~the following processes should be observed by~~ the competent authorities of the importing and exporting countries **should take in to account the following considerations:**”

7) Section 7 – Information exchange content

- Paragraph 14 d)

We would like to request for clarifications for the texts “competent authority responsible for certification” that whether they include “officially recognize certification bodies”.