



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEx COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION
AND CERTIFICATION SYSTEMS
Twenty-fourth Session
Comments of Ghana

Agenda Item 4

PROPOSED DRAFT GUIDANCE ON USE OF SYSTEMS EQUIVALENCE

Recommendation No. 22 a

Comment: We recommend for full references to be maintained in the text

Rationale: This will make it more convenient when reading and using the document to prevent having to go back and forth to a separate document.

Recommendation No. 22 b

Comment: Ghana suggests that the proposed draft is advanced to the next step of the Codex process. Ghana supports "Option B" under Recommendations; for the Committee to consider the development of new work to merge and rewrite the new and existing equivalence guidance.

Rationale: Option B removes the of referring to two different documents on equivalence.

Section 3 Definitions

Comment: Ghana suggests that the text in square brackets be left as is

Rationale: This is because it removes ambiguity

Section 4 Principles

Comment: The phrase "likely to" is preferred by Ghana as opposed to the use of the word "will"

Rationale: The choice offers flexibility in achieving equivalence and gives room for developing countries to achieve progressively high levels of quality assurance.

Point f

Comment: Ghana suggests the retention of the phrase "and timely" in the text.

Rationale: Because it is important for trade facilitation

Scope and Consideration

Comment: Ghana suggests the examples in point 16 are retained in the document.

Rationale: The examples make the text more specific

NFCS Objectives

Comment: Ghana suggest to retain "periodic review and continuous improvement"

Rationale: Because it provides more emphasis.

Agenda Item 5

PROPOSED DRAFT GUIDANCE ON PAPERLESS USE OF ELECTRONIC CERTIFICATES

Comment: Ghana agrees to the attached sample certificate model and is indifferent about the addition of the acronym "SOAP" in document.

Agenda Item 6

PROPOSED DRAFT PRINCIPLES AND GUIDELINES FOR THE ASSESSMENT AND USE OF VOLUNTARY THIRD PARTY ASSURANCES PROGRAMMES

Comment: Ghana suggests that the titles for each of the principles is maintained. We also suggest that Principle 1 is changed to read "Planning and Decision Making" to maintain consistency in the text.