



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD LABELLING

#### 48th Session

Quebec City, Canada

27 October – 01 November 2024

## APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF THE WORK OF CCFL

### Analysis of comments in reply to CL 2024/29-FL and amendment proposals

(Prepared by the CCFL Canadian Secretariat)

#### Introduction

1. The Committee on Food Labelling (CCFL) has been considering an approach and criteria for evaluation and prioritization of the work of CCFL for several years, following a request from the 70th Session of the Executive Committee (CCEXEC70) (2015).
2. The history of discussions up to CCFL47 is available in [CX/FL 23/47/14](#).
3. CCFL47 (2023) considered a revised proposal for an approach and criteria for prioritization of work of CCFL based on analysis of comments submitted at CCFL46 and in reply to CL 2022/73/OCS-FL and expressed general support for the recommendations. Due to time constraints, the committee requested that the CCFL Canadian Secretariat revise the approach and criteria taking into account comments provided at the session, including the request of CCEXEC to consider the request of WHO to consider the reduction of sodium intake when prioritizing and undertaking work. CCFL47 also agreed that a circular letter (CL 2024/29-FL) would be issued requesting comments on the revised document for consideration by CCFL48.
4. Comments in response to CL 2024/29-FL were received from 21 Member countries, 1 Member organization and 1 Observer and can be found [here](#). To progress the work, the CCFL Canadian Secretariat, under its own initiative, analysed and attempted to address the comments received. Accordingly, appropriate amendments have been made in the draft approach with the objective of facilitating discussions at CCFL48. The amended draft approach can be found in Annex I of this paper.

#### Analysis and Consideration of comments

5. Recalling that CCFL47 provided general support for the recommendations in CX/FL 23/47/14, the following points were kept in mind during the analysis and consideration of comments:
  - a) the Committee would focus efforts using the proposed approach as presented at CCFL47;
  - b) the prioritization approach would only be applied on an as-needed basis and that if the need arose, the process would be applied by an ad hoc working group, as generally supported at CCFL47<sup>1</sup>;
  - c) the intent of the prioritization approach was to keep it as simple and flexible as possible; and
  - d) the existing workload for CCFL is currently manageable, similar to the situation and decision reached at CCFL43.
6. **CL 2024/29-FL requested comments on the draft and to consider whether it was ready for use on a trial basis.** Of the 23 respondents, 13 Members agreed that the revised draft is ready for use on a trial basis with some expressing the view that the guidelines could be refined following experience gained by its use.

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<sup>1</sup> [REP23/FL](#) para. 180

### i. Amendments based on the comments

- a) **Criteria Table: Deletion of the row “Contributes to achieving internationally adopted global goals related to food safety, health and nutrition”:** Support for this criterion was mixed. A few comments suggested that this criterion be only included in paragraph 5 (now 5 bis) as it is qualitative. The sentence referencing this in paragraph 5 bis was modified to generally refer to internationally identified public health risks related to food safety, health or nutrition instead of specifically to the global goals of FAO or WHO. Subsequently, the further information text from the table was added to the footnote.
- b) **Paragraph 5: Incorporating texts from the Procedural Manual into the process:** References to the relevant section in the Procedural Manual were moved to a standalone paragraph to separate the requirements in the Procedural Manual from CCFL-specific additional criteria that could be used to prioritize work. The texts from the Procedural Manual were not reproduced in order to avoid duplication of detailed provisions from the Procedural Manual that could result in the guidelines being misaligned should there be changes to the Procedural Manual. It is important to note that the Codex Secretariat will be developing guidance on new work proposals.
- c) **Paragraph 6: Work of other Codex Committees:** A comment to consider identifying relevant work of other committees was captured in paragraph 6 with other qualitative factors.
- d) **Paragraph 7: Terms of Reference:** To clarify that the task of the ad hoc working group would be considered the terms of reference, revisions were made to paragraph 7 to outline a draft terms of reference for the ad hoc working group.
- e) **Paragraph 8: New work proposals include revisions:** The words “and revision” were deleted since the scope (paragraph 2) indicates that new work proposals include revisions of current texts.
- f) **Paragraph 11: Reference to the “overall rating”:** A comment pointed out that the document did not outline how the overall rating would be assigned. To address this, these words were changed to “evaluation” to align with the title of the section and would also provide flexibility on the final form that the evaluation would take.
- g) **Editorial corrections:** A number of editorial corrections have been made, as suggested by members in various sections. The editorial corrections have been made to clarify the text, have concise text that avoids duplication of text to the extent possible, provide consistency in terminology used and references to specific sections of the Procedural Manual.
- h) **Translation improvements:** A number of comments related to improvements in the Spanish translation have been noted and would be incorporated, as appropriate, in future translations.

### ii. Comments that were considered but did not result in amendments

7. Several comments were considered but did not result in amendments for the following reasons: they have been previously discussed in detail; did not appear to result in significant improvement; or were radically different from the approach generally agreed to so far. Considerations taken on some specific comments include:

- e) **Paragraph 4: Deletion of the phrase “including both positive and negative impacts”:** The phrase was previously added to paragraph 4 to provide direction to consider both positive and negative impacts for all criteria and also to avoid the need to repeat it in each of the criteria in the table that refers to impacts.
- f) **Consistency with the prioritization approach taken by CCNFSDU:** Comments suggested that the CCFL process mirror the prioritization criteria currently being piloted by CCNFSDU which included a decision tree. As noted in paragraph 5(c) above, with the intent to keep the prioritization process simple and flexible and only applied on an as-needed basis, consequently, the development of a decision tree was not considered at this time.
- g) **Criteria table:**
  - i) **Moving the entire table to the end of the document:** This proposal could disrupt the understanding of the reference to “additional criteria” mentioned in the scope section of the document.
  - ii) **Addition to the footnote:** A suggestion was made to include in the footnote the UN Sustainable Development Goals (SDGs) as another example. The intent of the footnote was to reference specific initiatives related to the mandate of CCFL, however any contributions to the SDGs would be referenced in the project document, as appropriate.

- iii) **Need for a numerical value rating scale:** One comment proposed this addition to assist in distinguishing similarly rated work. At CCFL46, it was proposed that the Committee consider taking a similar approach to that which was piloted by CCFICS<sup>2</sup> that did not include a numerical value rating and as noted in paragraph 5(c) above, with a view to keep the prioritization process simple and flexible, a numerical value rating scale was not considered at this time and could be reconsidered once the prioritization approach has been used on a trial basis.

## Recommendations

8. The CCFL48 is invited:
- i. to consider the proposed revision in Annex I of this document on an updated draft approach and criteria for evaluation and prioritization of new work, taking into account paragraph 5 and the comments summarized in paragraphs 6 - 7 above; (Note: a clean version of the revised draft approach can be found in Annex II).
  - ii. to agree that the draft approach is ready for use on a trial basis, should the need arise;
  - iii. to agree that any refinement to the draft approach, if needed, may be considered following experience gained with its use; and
  - iv. to agree that “The approach and criteria for evaluation and prioritization of the work of CCFL” would remain as an information document for the Committee.

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<sup>2</sup> [CX/FICS 23/26/9 Appendix B](#): Framework for the preliminary assessment and identification of priority areas for CCFICS prioritisation tool

**APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF THE WORK OF CCFL**

(Amendments presented in CL 2024/29-FL are identified in **underline and bold** or ~~strikethrough~~)

(Amendments by the CCFL Canadian Secretariat based on comments from CL 2024/29-FL with new amendments identified in **double underline and bold** or ~~double strikethrough~~)

**Purpose:**

1. The following guidelines are established to assist the CCFL to identify, prioritize and efficiently carry out its work, as needed, when there are multiple new work proposals to consider.

**Scope:**

2. These guidelines apply to new work proposed to the CCFL and lay down criteria and a process for evaluating the priority of new work proposals, including the revision of current texts.
3. ~~The prioritization approach has~~ **These criteria and process have** been developed in addition to the ~~“Criteria for the establishment of new work priorities” applicable to general subjects~~ as outlined in the *Procedural Manual*<sup>1</sup>. ~~The Additional criteria relevant to the work of the CCFL and the rating scheme~~ have been developed, taking into account the mandate of the Codex Alimentarius Commission, the priorities outlined in the Codex Strategic Plan, and the general principles of food labelling included in the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985) ~~(CSLPE)~~.

**Additional criteria for evaluating and prioritizing new work**

4. The following are the additional criteria against which the new work to be undertaken in CCFL may be assessed, **including both positive and negative impacts**:

Criterion	Further information	Rating
Relevance to CCFL mandate	Does the proposed new work fit within the terms of reference of CCFL?	Yes/No/Partially
<del>(If applicable) Contributes to achieving internationally adopted global goals related to food safety, health or nutrition</del>	<del>Identify the organization and goal<sup>2</sup> and describe how the proposed new work can address the goal, within the mandate of CCFL</del>	<b><u>Not applicable</u></b>
Impact on consumer health	Potential of <b><u>proposed</u></b> new work to prevent, reduce or resolve a consumer health risk	High Medium Low
Addresses false, misleading or deceptive labelling practices	Potential of the <b><u>proposed</u></b> new work to prevent, reduce or resolve false, misleading or deceptive labelling practices	High Medium Low
Impact on consumer's ability to make an informed choice	Potential of the proposed new work to assist the consumer in making an informed choice	High Medium Low
Impact on <b><u>international</u></b> trade practice	<b><u>Potential of the proposed new work to promote fair practices</u></b> <del>Impact on</del> in international trade	High Medium Low

**Process for evaluating and prioritizing new work**

5. As with normal Codex procedures, new work proposals should be presented to CCFL in the format of a project document addressing the criteria given under the “Criteria for establishment of work priorities” for general subjects in the *Procedural Manual*.

**5.bis** Additionally, the proposal should preferably also include a self-assessment, including supporting rationale and references, that takes into account the additional criteria outlined in this document. **If applicable, the new work proposal should may also describe how it contributes to achieving**

<sup>1</sup> **Procedural Manual, Section 2 Elaboration of codex standards and related texts; Criteria for the establishment of work priorities**

<sup>2</sup> ~~For example: WHA66.10: World Health Organization. Global action plan for the prevention and control of Noncommunicable diseases (NCDs) 2013–2020. Reduction of global population's intake of salt by 30% by 2025~~

addresses internationally adopted global goals of the FAO or WHO identified public health risks related to food safety, health or nutrition.<sup>3</sup>

6. New work proposals should also indicate work underway or planned by other committees on related topics, and, where possible, whether the work, if approved to commence, would likely lead to preparation of a new Codex text or revision of an existing Codex text.
7. Based on the amount of work on the Committee's agenda and the number of new work proposals, the Committee may decide ~~it may be appropriate for CCFL to establish an *ad hoc* working group, particularly in cases where multiple proposals are under consideration, that could be tasked~~ with the terms of reference to evaluate and prioritize new work proposals and tasked to make recommendations to CCFL. The *ad hoc* working group could take place during CCFL as an in-session working group, open to all interested Members and Observers, ~~and tasked to make recommendations to CCFL.~~
8. ~~As required, The~~ CCFL has the responsibility to may prioritize new work proposals ~~and revision following the process outlined above~~, taking into account the self-assessment in the new work proposals and/or recommendations of the *ad hoc* working group.
9. The Committee may reassess the priority of ~~each item~~ a new work proposal if new information becomes available relating to ~~an item that proposal~~. Such information may be submitted for consideration and the priority for the new work proposal reconsidered.
10. Ideally, the additional criteria should be applied in a stepwise manner, in the order set out in the criteria table above. If the Committee decides that a proposed work does not fall under the terms of reference of CCFL, then the remaining criteria do not need to be assessed.
11. ~~The proposed work should be assessed against the criteria as per the ratings given for each criterion. New work proposals will ultimately be prioritized as per the~~ overall rating evaluation received through this prioritization process. Additional criteria, such as feasibility of the proposed new work, may be necessary and developed later for application while considering two or more items of similar priority.
12. The CCFL will maintain the inventory of future work and emerging issues discussion paper that will include all potential work items relevant to CCFL. The inventory paper will be kept current at every session with a different Codex member taking on responsibility each time.

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<sup>3</sup> Identify the internationally identified public health risk organization and goal and describe how the proposed new work can address the risk goal, within the mandate of CCFL. For example: WHA66.10: World Health Organization - Global action plan for the prevention and control of Noncommunicable diseases (NCDs) 2013–2020 – Reduction of global population's intake of salt by 30% by 2025

**APPROACH AND CRITERIA FOR EVALUATION AND PRIORITIZATION OF THE WORK OF CCFL**

(Clean version)

**Purpose:**

1. The following guidelines are established to assist the CCFL to identify, prioritize and efficiently carry out its work, as needed, when there are multiple new work proposals to consider.

**Scope:**

2. These guidelines apply to new work proposed to the CCFL and lay down criteria and a process for evaluating the priority of new work proposals, including the revision of current texts.
3. These criteria and process have been developed in addition to the “Criteria for the establishment of work priorities” applicable to general subjects as outlined in the *Procedural Manual*<sup>1</sup>. The additional criteria have been developed, taking into account the mandate of the Codex Alimentarius Commission, the priorities outlined in the Codex Strategic Plan, and the general principles of food labelling included in the *General Standard for the Labelling of Prepackaged Foods* (CXS 1-1985).

**Additional criteria for evaluating and prioritizing new work**

4. The following are the additional criteria against which the new work to be undertaken in CCFL may be assessed, including both positive and negative impacts:

Criterion	Further information	Rating
Relevance to CCFL mandate	Does the proposed new work fit within the terms of reference of CCFL?	Yes/No/Partially
Impact on consumer health	Potential of proposed new work to prevent, reduce or resolve a consumer health risk	High Medium Low
Addresses false, misleading or deceptive labelling practices	Potential of the proposed new work to prevent, reduce or resolve false, misleading or deceptive labelling practices	High Medium Low
Impact on consumer’s ability to make an informed choice	Potential of the proposed new work to assist the consumer in making an informed choice	High Medium Low
Impact on international trade	Potential of the proposed new work to promote fair practices in international trade	High Medium Low

**Process for evaluating and prioritizing new work**

5. As with normal Codex procedures, new work proposals should be presented to CCFL in the format of a project document addressing the criteria given under the “Criteria for establishment of work priorities” for general subjects in the *Procedural Manual*.
6. Additionally, the proposal should preferably also include a self-assessment, including supporting rationale and references, that takes into account the additional criteria outlined in this document. If applicable, the new work proposal may also describe how it addresses internationally identified public health risks related to food safety, health or nutrition.<sup>2</sup>
7. New work proposals should also indicate work underway or planned by other committees on related topics, and, where possible, whether the work, if approved to commence, would likely lead to preparation of a new Codex text or revision of an existing Codex text.
8. Based on the amount of work on the Committee’s agenda and the number of new work proposals, the Committee may decide to establish an *ad hoc* working group with the terms of reference to evaluate and prioritize new work proposals and tasked to make recommendations to CCFL. The *ad hoc* working group

<sup>1</sup> *Procedural Manual*, Section 2 Elaboration of codex standards and related texts; Criteria for the establishment of work priorities

<sup>2</sup> Identify the internationally identified public health risk and describe how the proposed new work can address the risk, within the mandate of CCFL. For example: WHA66.10: World Health Organization - Global action plan for the prevention and control of Noncommunicable diseases (NCDs) 2013–2020 – Reduction of global population’s intake of salt by 30% by 2025

could take place during CCFL as an in-session working group, open to all interested Members and Observers.

9. The CCFL has the responsibility to prioritize new work proposals following the process outlined above, taking into account the self-assessment in the new work proposals and/or recommendations of the *ad hoc* working group.
10. The Committee may reassess the priority of a new work proposal if new information becomes available relating to that proposal. Such information may be submitted for consideration and the priority for the new work proposal reconsidered.
11. Ideally, the additional criteria should be applied in a stepwise manner, in the order set out in the criteria table above. If the Committee decides that a proposed work does not fall under the terms of reference of CCFL, then the remaining criteria do not need to be assessed.
12. New work proposals will ultimately be prioritized as per the evaluation received through this prioritization process. Additional criteria, such as feasibility of the proposed new work, may be necessary and developed later for application while considering two or more items of similar priority.
13. The CCFL will maintain the inventory of future work and emerging issues discussion paper that will include all potential work items relevant to CCFL. The inventory paper will be kept current at every session with a different Codex member taking on responsibility each time.