

May 2005

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 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 12 (b)

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Twenty-eighth Session

FAO Headquarters, Rome, 4 – 9 July 2005

IMPLEMENTATION OF THE JOINT FAO/WHO EVALUATION OF THE CODEX ALIMENTARIUS AND OTHER FAO AND WHO WORK ON FOOD STANDARDS

REVIEW OF THE CODEX COMMITTEE STRUCTURE AND MANDATES OF CODEX COMMITTEES AND TASK FORCES

Comments from: Canada and the United States of America

CANADA

Canada would like to extend its appreciation of the work done by the consultants in conducting this review and preparing the subsequent report.

The report identifies six key problem areas: resource constraints, Codex's changing mission, working methods, insufficient management of the work program, workload of CCFAC and the failure of the current structure to facilitate effective management. The analysis of these six problem areas has resulted in the consultants developing 20 recommendations for the consideration of the Commission.

General Observations

Canada would agree that the problem areas identified by the consultants are the primary areas where improvements must be made so that the efficiency and effectiveness of Codex can be enhanced. Although we generally agree with the analysis conducted by the consultants, particularly with regards to management of the work program, Canada is of the view that not all of the recommendations proposed are the best options for addressing these problem areas. Our comments on each of the recommendations are provided in the paragraphs below.

*****/E

We agree with the central conclusion of the report that it is time for Codex to move from its historical “committee-oriented” approach to a “task-oriented” approach. Recent experiences with Task Forces have shown that precise tasks attached to definite timeline are more conducive to timely development of standards which are responsive to member countries’ needs.

We fully agree that the “management deficit” regarding the standards elaboration procedures needs to be addressed. However, we do not support the creation of a “Commodities Management Committees” as the best approach to address this deficit. Canada believes that CCEXEC is the appropriate committee to exercise this function, particularly in light of its changing role and membership.

Specific Comments

1. *A formal prioritization should be undertaken of all new work proposals, before resources are allocated. (5.3)*

Canada supports this recommendation. We would draw the attention of the Commission to the requirement in the Procedural Manual for Committees to develop a project document when requesting approval of new work¹. It is Canada’s view that this project document not only serves as the basis of the critical review process, but it can also be an invaluable tool to aid Committees to clearly identify the scope of the work being undertaken, what the end product will be and its relevance to the Commission’s strategic objectives. Therefore, we believe that project documents should be endorsed by the Committee before being submitted to the Commission.

2. *Steps should be taken to increase the proportion of work done by correspondence (5.3)*

Canada supports the intent of the recommendation, although we note that the practicality of work by correspondence depends very much on the nature of the document under consideration. For example, as host government for the Codex Committee on Vegetable Protein, Canada led the development of the Codex Standard for Wheat Protein Products. This work was done entirely by correspondence. It is our view that this was a successful undertaking as the document was technical in nature and of interest to a limited number of Members and Observers. Other types of documents, such as the Proposed Draft Working Principles for Risk Analysis for Food Safety would be extremely difficult to develop through correspondence. The creation of a project document could also be done by correspondence, so that much of the work is done before the document is discussed in plenary. We note that the Codex Committee on General Principles has developed guidelines for electronic working groups, proposed for adoption by the 28th Session of the Commission, which also offer guidance to work done by correspondence.

3. *A time limit should be set for completion of each new project (5.3)*

Canada fully supports this recommendation. Not only should a time limit be established, it should be adhered to unless there are extenuating circumstances to warrant an extension.

4. *Wherever possible, committees should be given enabling TOR only. They should be reactivated as necessary to undertake defined tasks and adjourned sine die once that task is completed. (5.5)*

As stated above, Canada supports the central conclusion of the report in that it is time for Codex to move from its historical “committee-oriented approach” to a structure which is more “task-oriented”. We believe enabling TOR could help streamline the agendas of many committees which seem to grow larger every year.

5. *Codex should review its remit to ensure that it conforms more closely to the current expectations of its members, having particular regard to the implications of the WTO agreements. (6.5)*

Canada would agree that the significance of Codex standards to international trade has increased and it might be useful to determine the implications of this increased significance to Codex as a food standards setting body. However, we are not convinced that a review of Codex’s mandate is warranted. We would agree it is important to explicitly clarify the changes, if any, of its role stemming from WTO agreements. We would note, however, that Codex standards continue to be relevant to many Member countries that may rely on Codex for guidance for their food control systems for consumer protection, not just for trade.

¹ Procedural Manual, 14th Edition, Page 20.

6. *The relevance of the work of other international standards setting bodies should be determined, and a clear statement of demarcation lines made clear to all participants. (6.5)*

It is Canada's opinion that Codex should be more flexible in collaborating with other international organizations. We recognize the concerns of some countries, but we believe there is full opportunity to discuss proposals in an early stage (step 3) within Codex in an inclusive and transparent manner. It should be recognized that many other international organizations (intergovernmental or not) have scientific expertise and resources to progress work that otherwise could not be done by Codex. Positive examples include the work of the International Dairy Federation (IDF) which is heavily relied on by CCMMP. CCMAS also uses the technical expertise and work of AOAC and IUPAC.

7 *A regular meeting of the chairs of subsidiary bodies should be formally recognised in the Procedural Manual. The meetings may be informal, but a summary of the main points discussed should be made available to all Codex members. (7.2)*

Canada is of the view that regular meetings of the Chairpersons of subsidiary bodies provides an opportunity to improve the operational efficiency of the Codex standard setting process through enhancing consistency, collaboration and coordination amongst the committees and task forces and thereby improving the quality of the standards elaborated. However, we do not believe it is necessary to formally recognize these meetings in the Procedural Manual. We are of the view that the meetings of the Chairs can be most effective when they can provide input to and/or receive input from the Executive Committee in its standards management role. As such, Canada sees value in an interaction between the meetings of the Chairs and the Executive Committee.

8. *Steps currently being taken to encourage collegial working within the Codex Secretariat should be encouraged. (7.4)*

Canada supports this recommendation.

9. *Maximum use should be made of working groups, bilateral, or other low-level contacts between sessions to reduce the time needed to reach consensus in plenary meetings. (7.5)*

Canada supports the use of Working Groups (electronic and physical) between sessions consistent with the guidelines developed by CCGP, which should be adopted by the 28th Session of the CAC. Working Groups are an effective means to facilitate standards development between Sessions, and can lead to a resolution of issues which would normally consume a lot of limited plenary time. We believe "physical" working group meetings are particularly useful to advance discussion and consensus on "policy issues". These "physical" meetings should be held (as much as possible) in conjunction with a scheduled Codex meeting, subject to a host government's ability to provide service and incur costs.

10. *All standard-setting work should be subject to a greater degree of management oversight. Specifically, a new Commodities Management Committee should be established to manage the preparation and updating of commodity standards. (10.7-8)*

Canada would agree that all standard-setting work in Codex requires a greater degree of management oversight, but we do not support the concept that a "Commodities Management Committee" should be established. We question whether such a large committee is the appropriate approach to agree on priorities between competing committees' demands. Our view continues to be that the Executive Committee is the most appropriate body to exercise management oversight of the standard setting work, especially in view of its changing role (e.g. critical review, strategic planning, budgeting) and changing membership (i.e. Regional Coordinators becoming members). We believe that even as a small, executive body, it will be appropriately representative of the overall membership (i.e. with a Member from each geographical region plus the Regional Coordinators) and the issue of transparency can be satisfactorily addressed. In this regard, we note the decision of the 21st Session of the CCGP that "*efforts should continue within the Commission with a view to finding a satisfactory solution for the issue at hand, at the lowest cost, without compromising the efficiency of the Executive Committee*". We would further note that final decisions remain within the purview of the Commission itself, at which all Members and Observers participate, and thus ensures the transparency of the decision-making process.

11. All commodity committees and task forces should be given simple enabling TOR which should be revised for a limited period only, to assign specific tasks to the committee. (10.10)

Canada supports this recommendation but would note that task forces by their nature have limited TOR thus their inclusion in the recommendation is redundant.

12. The circumstances in which the Executive Committee, or some other body, should carry out a similar management role for the other committees should be carefully considered by the Commission. (10.12)

Canada does not support this recommendation. This recommendation makes an assumption that a “Commodities Management Committee” would be established as proposed in recommendation No. 10. If a “Commodities Management Committee” is not established, this recommendation is redundant. As we have noted previously, the Executive Committee would be responsible for management oversight and the Executive Committee reports to the Commission, which is the decision-making body.

13. All committees should be encouraged to adopt a more systematic approach to self-management. (8.7)

Canada supports this recommendation. We are of the view that through the proper preparation and use of project documents, and by making the Committees accountable for what they do or do not achieve with respect to their work plans, self-management will be enhanced.

14. CCFAC should be split into separate Additives and Contaminants committees. (9.4)

We support this recommendation taking into consideration the heavy workload of this Committee.

15. The GSFA should be the single authoritative reference point for food additives and this should be made clear in all commodity standards. (11.11)

Canada supports this recommendation.

16. All Codex requests for JECFA advice on additives and contaminants should be routed exclusively through the Additives or Contaminants committees (11.9)

Canada supports this recommendation, noting that Codex requests for JECFA advice on veterinary drug residues should be routed through CCRVDF.

17. Consideration should be given to re-writing the TOR of CCMAS and re-assigning responsibility for specifying methods of analysis and sampling to the committee specifying the relevant limits. (12.3)

Canada supports this recommendation provided appropriate technical expertise on “methods of analysis” is available to these committees. One benefit of this approach may be that the “analytical community” would be involved in the discussion on standard development from the beginning, which may facilitate in the establishment of the appropriate methodology. We also note that there may be a need for a broader discussion in Codex regarding the endorsement of methods without the accompanying standard.

18. The Commission should consider carefully whether nutrition should play a role in Codex, and if so, what that role should be. (12.5)

Canada is of the view that nutrition issues should be a part of Codex work, given the mandate of Codex and recognizing the role of WHO as one of the parent organizations. We believe it is necessary for Codex to clarify the type of nutrition issues that are relevant to Codex’s mandate, and to clearly define the roles of Codex, WHO and Member governments with respect to nutrition issues.

19. CCMH should now be wound up. CCFH should consider possibility of drafting a set of general

Canada would agree that now that CCMH has completed its work program, it should be adjourned. However, with respect to the second sentence of this recommendation, we are not clear as to what is meant and requires some clarification. We are not certain how this additional “general guideline” would substantially differ from what is currently the practice.

We note that different approaches are being deployed to develop hygiene provisions for Commodities. In recent years, the CCFH has been successful in advancing work on hygiene provisions for milk and milk products, and egg and egg products. Most of the work has been done between CCFH sessions, by technical

working groups that had a very focused mandate and pool of expertise. CCFH has acted as the “overseer”, making sure the code is consistent with basic CCFH hygiene texts such as GPFH, HACCP principles. This model could be considered in the future for development of hygiene provisions for other commodities, including any necessary future Meat Hygiene work.

20. *Provision for the drafting of regional standards should be removed from the TOR of the Regional Coordinating Committees. (12.8.)*

We question the validity of this recommendation, particularly in light of the fact that the review by the Commission of the mandate and structures of the Regional Coordinating Committees is not yet completed. The views of regional coordinating committees that have been active in developing regional standards, and the positive outcomes this may have produced, e.g., facilitate intra-regional trade need to be considered. Notwithstanding the lack of recognition given to regional standards by the WTO, such standards are often important for countries in a region to participate in trade amongst themselves, which is frequently the stepping-stone to broader, inter-regional trade. Therefore, the process of elaborating and utilizing regional standards by members of a region is frequently an elemental step in their economic development and enhancement of the level of protection for their consumers. We would also note that capacity building is one of the complementary elements of the Joint FAO/WHO Food Standards Program and the process of developing a regional standard is, in itself, a capacity building process. Therefore, consideration of this recommendation should be deferred until after the review of the mandate and structure of the Regional Coordinating Committees is completed.

UNITED STATES OF AMERICA

General Comments

The United States supports the review of the structure and mandates of Codex committees. The U.S. agrees with the consultants’ findings that safety should be separated from quality with food safety as the clear priority for science-based Codex standards. Also, more emphasis must be placed on justification and prioritization of tasks to be taken on. The U.S. concurs with the consultants’ findings that the key problems associated with the current Codex committee structure and mandate include: 1) resource constraints; 2) the changing mission of Codex; 3) current working methods that are not cost effective; and 4) a “management deficit” in the way Codex organizes and structures its work program.

Also, the U.S. agrees with the statements in paragraphs 5.1 and 5.2 that the Codex Secretariat is severely overstretched. The U.S. calls for a significant reassignment of resources to Codex by the parent bodies.

Recommendations

1. A formal prioritization should be undertaken of all new work proposals, before resources are allocated. (5.3)

The United States supports formal prioritization of new work, not only to improve the efficiency of Codex but also for Codex to maintain international relevance. Prioritization is dependent on establishing meaningful criteria and then on better management oversight to ensure that the criteria are adhered to. The FAO/WHO evaluation of Codex and subsequent Commission decisions concur that protection of consumer health must be the first priority. Criteria for prioritization must also take into account the international relevance of the work being proposed and the likelihood of obtaining consensus. Each committee should review its current work projects, not just new work, and discontinue work on those projects that do not meet the criteria.

2. Steps should be taken to increase the proportion of work done by correspondence (5.3)

The United States concurs with this recommendation. Correspondence should be the method of choice for developing documents through the early stages. Documents that are relatively simple and non-controversial can be developed through their final stages using correspondence. However, it has been our experience that issues that are controversial or complicated are best finalized in physical meetings. For correspondence to be an effective method of working, Codex members must demonstrate more discipline in responding to calls for comments within the established deadlines. Also, FAO should work with developing countries to ensure that they are fully equipped to work through correspondence. The issue of rapid, accurate translation into all

working languages while working through correspondence should be further considered by the Codex Secretariat and the Executive Committee.

3. A time limit should be set for completion of each new project (5.3)

The United States supports the establishment of time limits for the completion of each new work project. However, flexibility is required. The time limit should be understood as the point at which the Executive Committee makes the decision of whether to continue the work. As a rule, work should be stopped on projects that are not advancing sufficiently (e.g. at Step 3 or less), unless there are compelling reasons not to do so. For projects that are not terminated at the time limit, Committees should be requested to provide an up-dated estimated completion date. Committees should be granted a limited number of extensions (e.g., one or two).

4. Wherever possible, committees should be given enabling TOR only. They should be reactivated as necessary to undertake defined tasks and adjourned *sine die* once that task is completed. (5.5)

The United States notes that recommendation 11 is similar, but is limited to “commodity committees”. The U.S. will discuss commodity committees under recommendation 11. However, the U.S. questions whether this recommendation would be appropriate for the “safety committees” (CCFH, CCFAC, CCPR, CCRVDF, CCMAS) or for CCGP.

5. Codex should review its remit to ensure that it conforms more closely to the current expectations of its members, having particular regard to the implications of the WTO agreements. (6.5)

The United States concurs with this recommendation. The WTO SPS and TBT Agreements have had significant impact on Codex, including the status and importance of Codex texts, the need for a scientific basis in the development of texts relating to food safety, and in the use of Codex texts by countries. While it is important to maintain the autonomy and integrity of Codex, Members do have new expectations as a result of the WTO Trade Agreements and these need to be taken into account as Codex conducts its work.

6. The relevance of the work of other international standards setting bodies should be determined, and a clear statement of demarcation lines made clear to all participants. (6.5)

The United States supports this recommendation. A continuing challenge posed by other international bodies is to avoid duplication or inconsistencies in international standards. It is particularly important that the work of Codex be aligned with that of OIE and IPPC, as these three standards setting organizations are specifically referenced in SPS Agreement. Other organizations that provide particular challenges are OECD and ISO – OECD because its membership is less international than Codex and ISO because the basis its membership and organizational goals differ from those of Codex. The U.S. notes, with some concern, the recent food safety activity of ISO and believes that this situation should be addressed by Codex and ISO as soon as possible. An agreement should be established to define a clear separation of work between Codex and ISO.

7. A regular meeting of the chairs of subsidiary bodies should be formally recognised in the Procedural Manual. The meetings may be informal, but a summary of the main points discussed should be made available to all Codex members. (7.2)

The United States supports this recommendation. While the meeting should be informal (e.g., no ALINORM), the meetings should be more structured than those held to date. The Codex Secretariat should attend these meetings and should work with the Codex Chairperson to identify issues and prepare an agenda in advance of the meeting.

8. Steps currently being taken to encourage collegial working within the Codex Secretariat should be encouraged. (7.4)

Paragraph 7.4 of the consultants’ report notes that periodic coordination meetings by the food standards officers who work in the Codex Secretariat are now being held. It is somewhat revealing that this has not been a regular procedure of the Secretariat in the past. The Secretariat “sees” more Codex sessions than any other group or member country. Regular meetings of the Secretariat to discuss how better to conduct committee sessions would undoubtedly be beneficial. Lessons learned from experience could be passed on to committee chairs, either in the informal meeting of the chairs or through an “informal” instruction manual for conducting meetings.

9. Maximum use should be made of working groups, bilateral, or other low-level contacts between sessions to reduce the time needed to reach consensus in plenary meetings. (7.5)

The United States supports this recommendation. Working groups are useful to advance technical documents, but the U.S. notes the difficulty of participation, especially for developing countries. Whenever possible, working groups should be arranged in conjunction with existing meetings, with maximum use made of electronic communications.

10. All standard-setting work should be subject to a greater degree of management oversight. Specifically, a new Commodities Management Committee should be established to manage the preparation and updating of commodity standards. (10.7-8)

The United States concurs that all Codex standard-setting work should be subject to a greater degree of management oversight. Management oversight should include assuring that proposed new work meets the criteria for work priorities, that work is progressing expeditiously, and that work which is not progressing is discontinued or managed differently. However, the U.S. is not convinced that a Commodity management Committee is necessary. Such a committee may simply create another level of bureaucracy with new resource requirements. We are not convinced that the committee would improve the efficiency of Codex but may experience the same inability to make decisions on work priorities due to lack of consensus. The Executive Committee has recently been charged with the responsibilities for standards management. Rather than create a new committee, the Executive Committee should be instructed to institute aggressive standards management. If, after some time, it is clear that the Executive Committee cannot provide the needed standards management, the concept of a commodity standards management committee could be reconsidered.

11. All commodity committees and task forces should be given simple enabling TOR which should be revised for a limited period only, to assign specific tasks to the committee. (10.10)

The United States agrees that commodity committees, in general, have completed the initial priority work and should be adjourned. The terms of reference for each adjourned committee could be replaced with simplified generic terms of reference. However, this should be done in a careful, stepwise manner:

1. An evaluation of each commodity committee and the work before it
2. Determination of which work should be completed and which work should be discontinued. Much of the work currently before commodity committees could be completed or at least facilitated by electronic working groups (for example, revision of the standards before the Codex Committee on Processed Fruits and Vegetables (CCPFV).
3. Adjournment of the committee when the work to be continued is completed.
4. Creation of clear and meaningful criteria for new work on commodities. Global relevance and volume of international trade should be taken into consideration.
5. Reactivation of the committee only with a specific, time-limited mandate. Mandates should not include food additive provisions or codes of hygienic practice.

Oversight of the work could be achieved by a more "task oriented" Executive Committee. Also, the Committee of Chairs may play a useful role.

Unless steps are taken to discontinue or limit the work of the commodity committees, the goal of reducing the number of meetings in Codex cannot be achieved.

12. The circumstances in which the Executive Committee, or some other body, should carry out a similar management role for the other committees should be carefully considered by the Commission. (10.12)

Although the Codex Committee on Food Labelling (CCFL) and the Codex Committee on Food Import Export Inspection and Certification Systems (CCFICS) are not commodity committees, the United States believes that better management oversight could help ensure that future CCFL and CCFICS work has relevance to the broad membership of Codex and results in facilitating trade. Also, it is possible that CCFL and CCFICS need not meet as often as they currently do.

13. All committees should be encouraged to adopt a more systematic approach to self-management. (8.7)

The United States supports this recommendation. However, there must be some degree of oversight exercised, perhaps by the Committee on General Principles, to ensure that there is consistency among the committees.

14. CCFAC should be split into separate Additives and Contaminants committees. (9.4)

The United States supports splitting CCFAC into two committees. A key issue is the selection of a host country and a seamless transfer of responsibility from the Netherlands to the new host so that there is no delay in the progress on the General Standard for Food Additives.

15. The GSFA should be the single authoritative reference point for food additives and this should be made clear in all commodity standards. (11.11)

The United States supports this recommendation. The food additive sections of all commodity standards should be revised to refer to the GSFA. The GSFA should be the single, authoritative Codex reference text for additive safety limits in all foods, whether they are subject to a standard or not. The food additive section of commodity standards should contain a clear statement referencing the GSFA. This will free up substantial commodity committee resources and enable these committees to work on other provisions that address the dual mandate of Codex. The chairs of committees and the Codex Secretariat should make clear that the GSFA is the single Codex reference point for food additives. It is important that there be good cross-committee communication between CCFAC (or its food additive successor) and commodity committees to ensure that commodity committees have a full understanding of the GSFA and that CCFAC has a full understanding of the food additive needs with respect to the commodity involved. To implement this task, CAC could charge CCFAC with 1) recommending amendments to the Procedural Manual that would be referred to the CCGP for endorsement; and 2) incorporating all food additive provisions in commodity standards into the appropriate food category in the GSFA.

16. All Codex requests for JECFA advice on additives and contaminants should be routed exclusively through the Additives or Contaminants committees (11.9)

The United States supports this recommendation. It should be noted that CCFAC's terms of reference, uniquely among all committees, provide CCFAC with this remit. Implementation of this recommendation requires no changes to the Procedural Manual, only "enforcement" by Codex chairs and the Secretariat.

17. Consideration should be given to re-writing the TOR of CCMAS and re-assigning responsibility for specifying methods of analysis and sampling to the committee specifying the relevant limits. (12.3)

The United States supports a re-evaluation of the TOR for CCMAS. CCMAS should continue to have responsibility in establishing Codex guidance relating to method validation, sampling plans and associated needs related to methods of analysis. The responsibility for adopting specific methods of analysis and sampling plans could be reassigned to the committee specifying the relevant limits. Those committees should work closely with observer organizations such as ISO and AOAC International.

18. The Commission should consider carefully whether nutrition should play a role in Codex, and if so, what that role should be. (12.5)

The United States believes that the discussion in Section 12.5 does not adequately characterize the nature of nutrition work in the Codex. The discussion does not mention that many provisions already address nutrients and related food components in support of the Codex mandate to protect consumers' health. These focus on reducing risk from excessive intakes (not unlike food safety considerations with other food substances that are a major focus of Codex work), as well as reducing risk from inadequate intakes (an aspect of risk management specific to nutrients). Examples of Codex work aimed at managing nutrient risk include the establishment of minimum and maximum levels of nutrients and related food components in infant formula, the identification of safe and biologically available nutrient compounds for use in foods for infants and young children, criteria for the establishment of maximum levels in vitamin-mineral food supplements and consideration of the safety and bioavailability of the nutrient sources, food fortification principles, and food safety considerations for nutrients and other substances that are the subject of health claims. Thus, we believe that the report oversimplifies the classification of Codex nutrition work into two categories: 1) nutrition labeling, and 2) foods for special dietary uses.

While disagreeing that there is a need for the Commission to evaluate whether nutrition should play *any* role in Codex, the U.S. supports the recommendation to further study what that role should be. The U.S. supports efforts to prioritize future Codex work on nutrition issues, including standards for foods for special dietary uses as well as Codex texts that are applied “horizontally”, with priority given to work that is most likely to further the goal of Codex to protect consumers’ health (i.e., issues related to food safety and adequate nutrient intake).

The U.S. supports the study of various options and strategies to increase efficiency in the work of the CCNFSDU and CCFL. One option is to retain the two committees and focus on recommendations to improve management within the current structures. The consultants also proposed an option whereby “nutrition labeling issues” would be transferred to the CCFL, foods for special dietary uses would be addressed by task forces, and all other work (on nutrition) would cease. For the reasons above, the U.S. does not believe that ceasing work on nutrition is a viable option. The U.S. supports the study of the pros and cons of combining the two committees into one committee that would address both nutrition and labeling issues, and further study of the pros and cons of handling standards for foods for special dietary uses via a standing committee, task force(s), or combination. The study should provide specific long-term recommendations for the handling of nutrition-related subjects by Codex.

19. CCMH should now be wound up. CCFH should consider possibility of drafting a set of general guidelines to help rationalise hygiene provisions in commodity standards. (12.6)

The most recent session of CCMH appears to have completed the Committee’s current work program. The United States believes that all Codex food hygiene work, including both pathogen specific and commodity specific guidance, should be coordinated through CCFH.

20. Provision for the drafting of regional standards should be removed from the TOR of the Regional Coordinating Committees. (12.8.)

The United States does not support this recommendation. Drafting regional standards in regional committees may help facilitate regional trade in certain commodities where international trade is limited. Regional committees could also be used to initiate drafting of international standards where specific regional expertise is available. Codex should establish criteria to determine when a regional standard should be considered for development into an international standard. Also, Codex needs criteria or some form of management oversight to ensure regional standards do not become barriers to trade.