

UNITED STATES DELEGATION

**TO THE 25th SESSION OF THE
CODEX COMMITTEE ON FOOD IMPORT AND EXPORT
INSPECTION AND CERTIFICATION SYSTEMS**

Date to be confirmed

**DRAFT POSITIONS
March 25, 2020**

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT
INSPECTION AND CERTIFICATION SYSTEMS

25th SESSION

Date and location to be confirmed

Location: To be confirmed

Start time: To be confirmed

U.S. Delegation:

Mary Stanley, Delegate
Caroline Smith DeWaal, Alternate Delegate
Julie Callahan, USTR
Bryce Carson, USDA Food Safety and Inspection Service (FSIS)
Megan Crowe, Department of Commerce (DOC)
Jen Stephenson, DOC NOAA
Kristen Hendricks, U.S. Codex Office
Katherine (Kate) Meck, HHS FDA
Lisa Romano, HHS FDA
Lori Tortora, USDA FAS
Sarah Fasano, USDA/FAS
Nick Gardner, U.S. Dairy Export Council

Coordination Meeting Schedule (U.S. Government Participants only)*

<schedule of meetings to be confirmed>

U.S. - Chair
Quads (+ EU + UK)
CCAfrica
CCAsia
CCLAC
Others

*Coordination meetings will be impacted by the physical working group/work shop schedule.

Daily U.S. Delegation Meetings will be scheduled as needed.

Proposed PHYSICAL WORKING GROUPS:

- Guidance on paperless use of electronic certificates
- Draft Principles and Guidelines for the assessment and use of voluntary Third-Party Assurance (vTPA)
- Guidelines related to equivalence
- Workshop on Food Fraud

Working documents for each agenda item, as well as practical information related to CCFICS25 will be made available at the session Website meeting page – [CCFICS25](#).

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Agenda Item 1

CX/FICS 20/25/1

ADOPTION OF THE AGENDA

DRAFT U.S. POSITION

The United States agrees with the Agenda Items, as proposed.

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Agenda Item 2

CX/FICS 20/25/2

**MATTERS REFERRED TO THE COMMITTEE BY THE CODEX ALIMENTARIUS COMMISSION AND
ITS SUBSIDIARY BODIES**

DRAFT U.S. POSITION

The content of this paper is informational.

Matters Arising from the Codex Alimentarius Commission (CAC42, 2019):

- adopted the Draft Principles and Guidelines for the Assessment and Use of voluntary Third-Party Assurance (vTPA) at Step 5 noting that all technical comments should be resubmitted for consideration by CCFICS.
- approved the proposal for new work on the consolidation of Codex Guidelines related to equivalence.
- noted the proposal from one Member that the Codex Committee on Food Labelling (CCFL) collaborate with CCFICS on developing guidance to assist in the control and inspection of food products sold online.

Matters Arising from Subsidiary Bodies related to the work of CCFICS:

Executive Committee of the Codex Alimentarius Commission (CCEXEC77)

- Highlighted the importance of the ongoing discussions in CCFICS on potential new work on food fraud and noted the need to expedite discussions with a view to advance this potential work. [See the project proposal for new work under Agenda Item 8.]
- Noted from the Critical Review discussions a possible proposal for an amendment to the format for commodity standards to include a section on traceability. This is relevant to the CCFICS work on food fraud.

Codex Committee on Fats and Oils (CCFO26) [2019]

- Agreed to refer to CCFICS the request expressed by Chile related to food fraud in oils in general and related to concerns about fish oil in particular, noting that the current format of commodity standards does not allow inclusion of traceability.

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Agenda Item 3

CX/FICS 20/25/3

CX/FICS 20/25/3 Add 1

CX/FICS 20/25/3 Add 2

**INFORMATION ON ACTIVITIES OF FAO AND WHO AND OTHER INTERNATIONAL
ORGANIZATIONS RELEVANT TO THE WORK OF CCFICS**

DRAFT U.S. POSITION

These papers are informational in nature.

CX/FICS 20/25/3

The document contains FAO/WHO's report on the tools produced and made available to Member States and the relevant activities carried out since CCFICS24 (October 2018).

The document:

- Notes the FAO and WHO Food Control System Assessment Tool that allows Member Countries to assess, in structured, transparent, and measurable ways, the performance of their food control system throughout the entire food chain, identify priority areas for capacity development, and measure and evaluate progress over time.
- Notes FAO and WHO activities on antimicrobial resistance (AMR).
- Notes FAO and WHO activities on early warning/alert and response to food safety emergencies.
- Notes FAO's activities related to food fraud.
- Notes the International FAO/WHO/AU Food Safety Conference (February 2019, Addis Ababa, Ethiopia) and International Forum on Food Safety and Trade (April 2019, Geneva, Switzerland).
- Notes the first UN World Food Safety Day (WFSD) was held on 7 June 2019 and the next campaign will be held on 7 June 2020 to promote global food safety awareness.
- Notes WHO governing body activities including work on a roadmap for the development of the Global Food Safety Strategy, in close collaboration with FAO.
- Notes FAO is in the process of updating existing and producing new guidance on risk-based inspection as part of the Food Safety and Quality series.

The document also summarizes, by region, the various regional and national WHO/FAO work that is related to the interests of CCFICS.

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CX/FICS 20/25/3 Add 1 (Information from OIE)

This document contains a summary of OIE participation in CCFICS activities, including:

- Electronic working group on the development of Codex Guidance on paperless use of electronic certificates. This work is closely linked to the STDF project on electronic veterinary certification which the OIE is managing (see item below).
- Electronic and physical working groups on the development of Codex Guidance for the assessment and use of Third-Party Assurance programs.
- Electronic and physical working groups on the development of Codex Guidance on recognition and maintenance of systems equivalence of National Food Control Systems.

The document:

- Notes OIE’s activities in electronic veterinary certification, including managing the implementation of STDF project on the “Development of a framework to facilitate e-veterinary certification for international trade on the basis of a single window system”.
- Notes the OIE Observatory project, so that the OIE will be better able to determine the effectiveness and practicability of its standards in order to propose solutions to Member Countries.
- Notes the OIE expanded OIE PVS Pathway activities and capacity development program, the OIE World Animal Health Information System (WAHIS), OIE Strategic Plan, and the OIE Training Platform.

CX/FICS 20/25/3 Add 2 (Information from WCO, WTO and STDF)

Activities of the World Customs Organization (WCO)

The document highlights WCO’s efforts in the area of information and communication technology (ICT), which could provide an unprecedented opportunity to increase the efficiency of Customs’ work. Paperless processing, dematerialization of documents and risk-based non-intrusive inspection are examples of WCO initiatives in the context of digitalization. The use of advanced electronic data, in a harmonized manner, could support Customs in providing greater facilitation for safe and legitimate trade by, inter alia, enabling the implementation of modern data-driven risk management and less intrusive clearance control.

The WCO has developed a range of guidance, instruments and tools to support Members in implementing digitalization and paperless processing, digital collaboration, interconnectivity and seamless data exchange. Examples of the instruments and tools include the WCO Data Model and Single Window Compendium, which are explained in the document.

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Activities of the World Trade Organization (WTO) and the Standards and Trade Development Facility (STDF)

This document provides a summary of the activities of the WTO Committee on Sanitary and Phytosanitary Measures (the "SPS Committee") since November 2018. Since CCFICS24 (October 2018), the SPS Committee held one regular meeting in November 2018 and three regular meetings in 2019. Mr. Daniel Arboleda, from Colombia, was appointed Chairperson for the 2019-2020 period in July 2019, taking over from Ms. Noncedo Vutula of South Africa.

The document:

- Notes the Fifth Review of the operation and implementation of the SPS Agreement.
- Notes the specific trade concerns raised about food safety, plant and/or animal health requirements imposed by another WTO Member.
- Notes the legal obligation of WTO Members to notify new or modified SPS measures when these deviate from the relevant international standards.
- Notes STDF issued a survey in mid-February 2020, in cooperation with IICA and UNIDO, on existing and/or planned regulatory frameworks and practices related to the use of voluntary third-party assurance (vTPA) programs in food and feed safety, based on Codex principles and guidelines.
- Notes STDF activities on Public Private Partnerships (PPP).

(IPPC REPORT IS PENDING)

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AGENDA ITEM No. 4

CX/FICS 20/25/4

CX/FICS 20/25/4 Add 1

DRAFT PRINCIPLES AND GUIDELINES FOR THE ASSESSMENT AND USE OF VOLUNTARY THIRD-PARTY ASSURANCE (vTPA) PROGRAMMES

DRAFT U.S. POSITION:

At its 24th Session, the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS24, 2018) advanced the proposed draft principles and guidelines for the assessment and use of voluntary third-party assurance (vTPA) programs to CAC42 (2019) for adoption at Step 5, allowing for another round of comments and consideration by the Committee. The Committee also agreed to establish an electronic working group (EWG) and to convene a physical working group immediately prior to CCFICS25, chaired by the United Kingdom and co-chaired by Canada and Mexico, working in English and Spanish, to consider comments submitted as well as all outstanding issues, including comments made at CCFICS24.

The paper discusses the opportunities and challenges, as well as the potential to leverage information and data generated, from the use of vTPA programs. The paper recognizes the opportunities vTPA could provide to strengthen national food control systems through:

- a. support for the activities of national competent authorities
- b. access to audit and intelligence data generated by the programs
- c. improvements to risk-profiling of food businesses
- d. enhanced prioritization of competent authority resources
- e. increased confidence in levels of compliance with regulatory requirements

During the discussion of the paper at CCFICS25, the United States will support the paper based on the following conditions:

- The guidance covers voluntary third-party assurance programs and audit outcomes (where applicable and relevant) as they relate to food safety.
- The guidance advises governments on approaches to assure the third-party programs are used to complement and align with national food safety systems; it does not promote or recognize third party programs as a substitute or replacement for government regulation.
- If governments chose to utilize vTPA programs, they are advised on approaches to ensure the integrity and competency of the vTPA system used.
- The guidance articulates standards for information sharing between vTPA programs and governments that provide for exchanges when needed to protect public health, while

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also protecting confidential business information and/or proprietary information from inappropriate disclosure. The guidance clarifies that governments should have clear rules of engagement for requesting access to vTPA information, such as notification to the food business operator, and protections for proprietary information.

At the physical working group, the United States will suggest editorial changes to emphasize the points outlined above.

PROPOSED CHANGES ~~striketrough~~ and **bolded**:

D: PRINCIPLES

11. When considering the potential role of vTPA programmes and the potential contribution ~~they~~ **their information/data** may make to FBO compliance with regulatory requirements and broader NFCS objectives, competent authorities should be guided by the following principles:

Rationale: aligns with wording that precedes this section in the document and makes it clear that the contribution being looked at in this paper is the information/data generated by the TPA program.

F: CRITERIA TO ASSESS THE CREDIBILITY AND INTEGRITY OF vTPA PROGRAMMES

13. Competent authorities that choose to use **information/data from** vTPA programmes **to help inform** ~~in~~ their NFCS should satisfy themselves that the vTPA information/data can be trusted and is fit for purpose. In order to do this they may carry out a full or partial assessment of the credibility and integrity of the vTPA programme, commensurate with their intended use of the vTPA information/data. When carrying out such an assessment, competent authorities should select the criteria below that are appropriate to the extent of their intended use of the vTPA programme as a start point for this assessment **and ensure that the vTPA programme has implemented them in a comprehensive way to assure successful outcomes.**

Rationale: Language modification aligns this text with the text in the rest of the document, highlighting the connection between the NFCS and the information/data generated by a vTPA. Additionally, current wording addresses concerns raised in previous sessions regarding the use of data to help inform NFCS and not supplement an NFCS.

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AGENDA ITEM No. 5

CX/FICS 18/24/5

**PROPOSED DRAFT GUIDANCE ON PAPERLESS USE OF ELECTRONIC CERTIFICATES (REVISION OF
THE *GUIDELINES FOR DESIGN, PRODUCTION, ISSUANCE, AND USE OF GENERIC OFFICIAL
CERTIFICATES – CXG 38-2001*)**

DRAFT U.S. POSITION:

The United States appreciates the efforts undertaken by the Netherlands and Australia, as co-chairs, to manage the electronic working group and consider comments submitted on both rounds of drafts of the revision to CAC/GL 38-2001 to address the updated terms of reference from CCFICS24 (2018). The United States continues to support additional guidance on paperless exchange of certificates, evidenced by our active participation in the EWG. However, while United States comments on both rounds of comments circulated to the EWG were considered, there are several outstanding issues that need to be addressed before the United States will be able to support advancing moving the document. We also recommend that the Committee continue to strive to find the right balance of “plain language” and technical language.

Some specific considerations:

The United States notes the paper continues to include concepts that appear to expand the scope of the terms of reference (CX/FICS 20/25/5; para 7). The concept of a Codex-owned reference model of the generic model official certificate has not been fully considered by the Committee. In order to move this work forward at this time, we suggest deleting Sections 8 and 9 from Annex II. The United States recommends that these concepts could be considered under future work, which should include a comprehensive review of the current model certificate included in CAC/GL 38/2001 (Annex 1).

The United States continues to question the placement of definitions in Annex II. For consistency, we recommend that all definitions are included in the main text. There is also a need to review several proposed definitions, including electronic signatures, digital signatures, and non-repudiation, as these are highly technical and may introduce confusion. Further discussion, perhaps in the physical working group, would provide clarity on the intent of both electronic signature and digital signature definitions, which would facilitate resolution for a clear definition and defined minimum requirements. Specific to non-repudiation, the United States had previously commented on the relevance of this specific term to this guidance. The text, as drafted, implies that non-repudiation is the only option available to achieve the goal of

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authenticity, security, and verification of paperless exchange. This term can have multiple legal, regulatory, or technical meanings, depending on the context, and could invite confusion.

The United States sees duplication and redundancy within the document, specifically in paragraphs 30-31 and paragraphs 42-45. The United States will submit specific edits for consideration through Circular Letter (CL) 2020/01.

The United States notes while Annex II Section 4 provides guidance on the transition to paperless exchange of official certificate, there may be a need to elaborate on alternative modes that can be used to transition from paper certificates to the paperless environment. Some examples that members are currently using include a digital image viewer or PDF issuance/exchange, which can provide steps toward achieving trust and full confidence between the importing and exporting countries, while also encouraging movement toward system-to-system XML exchange as the end goal. The United States will submit specific edits for consideration through CL 2020/01.

The United States notes there is an opportunity for the Committee to consider future work on CAC/GL 38-2001, including a comprehensive review of the guidance with specific focus on updating the data elements contained in the model certificate. Given the emphasis on Single Window alignment within the Annex II, the United States suggests that the committee consider revisiting the data elements in the generic model certificate to ensure those elements are essential for food safety and not redundant of those collected in the electronic single window environment. This future work could include the work outlined in Annex II Section 8 (Generic Reference Model of the Generic Model Official Certificate) and Section 9 (Examples of Data Modeling the Generic Model Official Certificate). As currently drafted, it is not clear how the proposed mapping of XML components to data elements on the generic model certificate fits into the scope of the current document. A more appropriate progression would be to pursue consensus on the data model as a separate effort after the main text has been updated (including the explanatory notes for the model certificate).

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AGENDA ITEM No. 6

CX/FICS 20/25/6

CX/FICS 20/25/6 Add 1

**PROPOSED DRAFT GUIDELINES ON RECOGNITION AND MAINTENANCE OF EQUIVALENCE OF
NATIONAL FOOD CONTROL SYSTEMS (NFCS)**

Draft U.S. POSITION

The United States appreciates the leadership of New Zealand in developing this paper and the excellent contributions made by members of the electronic and physical working groups. The document has made significant strides over the course of the last year and reflects the comments submitted by the United States, as co-chair and a member of the electronic working group.

The United States has will provide comments on CL 2020/02: Proposed Draft Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems. The specific edits are included in the draft position below (in **bold**).

As agreed at CCFICS24 (2018), this document will not replace/subsume traditional (measure-by-measure) equivalence. While there is reference to use CXG 53-2003 for further evaluation of a single sanitary [measure] or group of sanitary measures in the Preamble, the United States requests that the examples listed in Footnote 9, associated with paragraph 9, is amended to add, *“equivalence of a sanitary measure or group of measures,”*.

In Footnote 9: Examples of other mechanisms include but are not limited to: **equivalence of a sanitary measure or group of measures**; compliance with importing country requirements; harmonisation of requirements; mutual recognition; memoranda of understanding; or assurances based on some other means acceptable to both countries.

The document does not adequately address the rights retained by importing countries when requests for equivalence are made. Specifically, we recommend that language is added to make clear that it is up to the importing country to choose the appropriate pathway for equivalence.

In paragraph 14, we request the words, *“it has been determined that:”* be amended to read ***“provided that the importing country has determined that:”***

The document does not provide opportunities to consult with the public and interested stakeholders when equivalence determinations are being made. Additional transparency and public input steps are needed. Therefore, we request that the document should include specific language on the notification of the public. We note that CAC/GL 34-1999 provides language on the need to give the public notice and comment on equivalence agreements and

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also public notice on the text of the agreement, once finalized. We recommend the following paragraph be added to the document.

To enhance public confidence in the [agreement][decision to recognize equivalence of NFCS] while respecting legitimate concerns to retain confidentiality, the relevant competent authorities of the countries should provide the public – including consumers, industry and other interested parties — an opportunity to comment at an appropriate time on the proposed content of the [agreement][decision to recognize equivalence of NFCS].

The United States will listen to the views of the delegates to CCFICS and provide additional input on the draft guidelines to clarify issues at the physical working group in advance of CCFICS25. The discussion, including acceptance of the U.S. edits, will guide our consideration of whether the document is ready for advancement or, as noted in the agenda paper, to consider recommending accelerated progress within the step process so as to achieve the timeline for completion of this work in the project document approved by CAC40 (2017).

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AGENDA ITEM No. 7

CX/FICS 20/25/7

CX/FICS 20/25/7 Add 1

PROPOSED DRAFT CONSOLIDATED CODEX GUIDELINES RELATED TO EQUIVALENCE

DRAFT U.S. POSTIONS

The United States prepared a discussion paper for consideration by the Committee at CCFICS24 (2018), recommending Codex guidance on equivalence needs to be consolidated into a single document to eliminate the overlap between the existing texts and the new work on systems equivalence. The United States position continues to support a new single text related to equivalence that would help to avoid confusion and clarify the similarities and distinctions between undertaking equivalence for a measure, a group of measures, or a system. During CCFICS24 (2018), the Committee developed a new work project document and agreed that the re-established electronic working group (EWG) would commence the consolidation work in parallel with completing the draft proposed *Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems*. This new work was approved by CAC42 (2019).

The EWG focused on completing its work on the draft Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems before drafting of a specific consolidation text is initiated. This document being considered by the Committee is Appendix I of [CX/FICS 20/25/6](#). The United States supports commencing the work on *Consolidated Codex Guidance on Equivalence*, regardless of the outcome of consideration of the draft *Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems* in the step process.

The initial assessment of existing Codex text proposed in Appendix I of the agenda paper provides a good starting point, though the United States cautions against deleting operative or significant requirements without substantive discussion by Member Countries. The proposed more detailed side by side analysis of all the text identified for consideration to identify the specific areas of duplication or conflict is essential as we move forward to develop the consolidated guidance and should be left open for additions for consideration by members of the work group. The United States supports continuation of the current electronic working group to progress the development of draft consolidated guidance relating to equivalence that can be considered by CCFICS26. The United States would not object to a physical working group to facilitate the progress to prepare draft text for consideration by CCFICS26.

The United States is providing comments to CL 2020/03, including an alternative outline for a single *Consolidated Guidance on Equivalence* as proposed in Appendix II of the agenda paper.

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Proposed changes are **bolded**:

Section 1: Introduction/Preamble

Section 2: Purpose/Scope/Objective

Section 3: Definitions

Section 4: Principles

Section 5: **Steps in the Equivalence Process**

Step 1: Initial Discussions and Decision to Commence

**Step 2: Determine Scope of Equivalence Determination
(measure by measure or systems)**

**Step 3: Description of Importing Country National Food Control System (NFCS)
or relevant part (specific measure(s))**

Step 4: Decision Criteria to Assess Equivalence

**Step 5: Description of Exporting Country NFCS or relevant part (specific
measures(s))**

Step 6: Assessment Process

Step 7: Decision Process

Step 8: Formalization and Maintenance of the Decision

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AGENDA ITEM No. 8

CX/FICS 20/25/8

**DISCUSSION PAPER ON ROLE OF CCFICS WITH RESPECT TO TACKLING FOOD FRAUD IN THE
CONTEXT OF FOOD SAFETY AND FAIR PRACTICES IN FOOD TRADE**

DRAFT U.S. POSITION

The United States chaired the electronic Working Group (EWG) on Food Fraud, assisted by co-chairs from the EU, Iran and China. During CCFICS24 (2018), the United States stated that it was important to clarify the scope of the work, to ensure it is consistent with the Codex mandate, with a primary focus on food safety. The CCFICS EWG on Food Fraud developed and reviewed an inventory of relevant Codex texts on[or related to] food fraud, including the analysis of CCFICS texts presented in CX/FICS 18/24/7, by searching the primary Codex standards, guidelines, codes of practice, and a number of commodity committee texts, for specific key words. The EWG evaluated whether the entries in the inventory are relevant to the current work on food fraud.

The comprehensive review of existing Codex texts demonstrated that food fraud is already covered in a variety of Codex documents. The Codex Code of Ethics for International Trade in Food Including Concessional and Food Aid Transactions (CAC/RCP 20-1979 rev.) contains basic principles relating to preventing trade in unsafe, adulterated, out of date, or otherwise unsatisfactory food. Food fraud as it pertains to improper, inaccurate, false or misleading labelling is addressed in relevant Codex standards. For example, in the Codex Committee for Food Labelling (CCFL), STAN 1-1985 and STAN 107-1981 prohibit false, misleading or deceptive labelling for foods and food ingredients. Therefore, labelling that is inaccurate would already be addressed by existing Codex standards. Further, there are several existing CCFICS texts that provide tools for members wishing to manage potentially fraudulent activity. Examples include the traceability concepts found in CAC/GL 60-2006; utilization of CAC/GL 38-2001 to prevent fraudulent certificates; and two codes that cover exchanges of information between national governments that could be relevant in instances of fraud detection. The scope of *Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations* (CAC/GL 19-1995) is currently limited to the exchange of information on food safety emergencies while the *Guidelines for the Exchange of Information Between Countries on Rejections of Imported Food* (CAC/GL 25-1997) covers exchange of information on both food safety and fraud related rejections of imported food.

The United States notes that many countries who are part of the EWG support new work on food fraud, including the proposal for the development of harmonized definitions for food fraud and intentional adulteration.

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The EWG produced the Discussion Paper and Project Document that will be presented at CCFICS25. The Project Document recommends that new work include the development of guidance on food fraud with a view of improving risk management activities related to the prevention of food fraud that may cause harm to the consumer and/or disruption of trade.

The Discussion Paper recommends that the guidance should also include the following elements:

- (1) Definitions for key food fraud terms, such as food fraud, integrity, authenticity, and intentional adulteration;
- (2) Roles and responsibilities of industry and government entities when addressing food fraud;
- (3) Guidance on how countries can modernize their national food control systems to address food fraud, e.g., extension of HACCP and good manufacturing practices; and
- (4) Identification of technology and tools, countermeasures and controls that can be used by competent authorities and industry to detect acts of fraud and to reduce vulnerabilities when designing control programs to prevent food fraud and/or intentional adulteration.

The Paper also recommends that existing CCFICS texts will be reviewed and updated, as appropriate, to identify specific characteristics of National Food Control Systems, information exchange, vulnerability assessments, and traceability/traceback necessary to effectively prevent and manage food fraud.

The United States supports the common goal of food control authorities to protect public health and to prevent economic loss and trade disruption, which encompasses both minimizing inadvertent contamination and preventing intentional adulteration of food. Regarding any future work in CCFICS, the United States maintains that the work should reside within the scope and mandate of Codex, and not cover areas more appropriate for law enforcement or security agencies, such as bioterrorism/terrorism, or areas unrelated to food safety.

Many countries participating in the EWG described risk management tools that might assist in combating food fraud and intentional adulteration. The tools mentioned most frequently include traceability, vulnerability assessments, and information sharing. Given that those risk management tools are important to address other types of adulteration or mislabeling, the United States believes the Committee should consider the extent to which those tools are adequately described in existing CCFICS texts. For example, the *Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations* (CAC/GL 19-1995) and the *Guidelines for the Exchange of Information Between Countries on Rejections of Imported Food* (CAC/GL 25-1997) provide risk management advice for information exchanges. *The Principles and Guidelines for National Food Control Systems* (CAC/GL 82-2013) could also be reviewed to ensure it adequately covers the issues.

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The *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CAC/GL 60-2006) contains only Principles and does not provide specific guidance on traceability/product tracing for countries. The United States supports consideration of revision of that paper as part of the new work on food fraud and intentional adulteration.

The United States supports new work to provide definitions for food fraud and intentional adulteration. We also recommend that for risk management activities, consideration should be given to revising the existing text.

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AGENDA ITEM No. 9

CX/FICS 20/25/9

REVIEW AND UPDATE OF APPENDIX A — THE LIST OF EMERGING GLOBAL EMERGING ISSUES

DRAFT U.S. POSITION

Position pending receipt of document.

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AGENDA ITEM No. 10

CX/FICS 20/25/10

OTHER BUSINESS

DRAFT U.S. POSITION:

At this time, no other business has been identified.