

**Codex Committee on Food Import and Export Inspection and Certification
Systems (22nd Session)**

Melbourne, Australia, 6-12 February 2016

European Union comments on

Agenda Item 5:

**Proposed Draft Guidance for monitoring the performance
of national food control systems (CX/FICS 16/22/4)**

*Mixed Competence
European Union Vote*

The European Union and its Member States (EUMS) would like to submit the following comments:

General comments:

A proposal of additional principles in section 4. PRINCIPLES OF THE PERFORMANCE MONITORING FRAMEWORK may enrich the document, such as:

- ✓ Continuous improvement approach. The aim of the performance monitoring framework is the continuous improvement of the NFCS itself, and should not be used to compare outcomes of different countries.
- ✓ Organizational commitment. To ensure that the resources intended for the verification of the NFCS are enough to guarantee that the system review is carried out properly and also to ensure that the actions taken after the findings detected in the evaluation will be put in place to guarantee the continuous improvement.
- ✓ Reliability. To ensure the continuous improvement and transmit enough confidence to all stakeholders, the system should have attention to the quality and reliability of data.

A reference in section 5.2 (between points 55 and 56) of the importance of the root cause analysis could be included, when the findings detected in the review of the NFCS will reflect any deviation or unfavourable results in any field, to ensure that the measures adopted are appropriate for the continuous improvement of the system.

Paragraph 5 - Footnote 6 (Page 2)

“6 Australia, Belgium, Denmark, European Commission, Germany, Ghana, India, Ireland, Italy, Japan, Mexico, ~~the Netherlands~~, New Zealand, Norway, South Africa, Spain, Thailand, United Kingdom, the United States, Switzerland and the FAO

Rationale: The Netherlands did not participate in this physical working group

Specific comments:

SECTION 1. INTRODUCTION

Paragraph 1. An effective national food control system (s) (NFCS) is essential for ensuring the safety and suitability of food for consumers **and ensuring fair practices**.

Rationale: The mandate of Codex covers not only food safety but also fair practices. So does also the national food control system. That is why the EUMS would like to clarify the scope of the guidance by precisizing that it covers also fair practices.

SECTION 3: DEFINITIONS

Activity: Actions taken or work performed through which inputs (~~such as funds, staff, and other types of resources~~) are mobilized to produce specific outputs.

Rationale: There is already a definition of “input” in this section.

Efficiency: A measure of how ~~economically~~ resources/inputs (funds, expertise, time, etc.) are converted to results.

Rationale: Not valid only for economic resources, but for all resources.

Inputs: The financial, human, **technical** and material resources used for activities.

Rationale: Technical resources include: operating procedures, legislation, emergency plans, training procedures (Different than material resources that include adequate offices, labs, IT-Tools...)

Outputs: The products, ~~capital goods~~, and services which result from activities; may also include changes resulting from activities which are relevant to the achievement of outcomes.

Rationale: Are there capital goods resulting from the activities of official controls?

SECTION 4: PRINCIPLES OF THE PERFORMANCE MONITORING FRAMEWORK AND SECTION 5.2 MONITORING AND SYSTEM REVIEW STEPS

13. It is open to consultation and review by **relevant** national stakeholders during multiple stages of the process, while respecting legal requirements to protect confidential information as appropriate.

Rationale: The EUMS propose to add to paragraph 13 the term "relevant" before "stakeholders", such as it is written in the paragraph 29. As a matter of fact, the monitoring of the performance and its results cannot be communicated to all stakeholders involved in all cases. The competent authority should define the degree of transparency in relation to the goal pursued.

SECTION 5.1.: PLANNING STEPS

23. Monitoring and system review requires sufficient financial and human resources with relevant expertise to support the collection and use of data. The following questions can help the competent authority to assess existing resources and technical capacity:

- What human resource capacity and ~~financial~~ resources (**financial, human, technical and material**) are available to support monitoring and system review? How can existing resources be leveraged if necessary?
- Does the competent authority have access to individuals with expertise in strategic planning, performance management, program management, analysis, and data management?

Rationale: Human, technical and material resources should also be taken into account.

SECTION 5.2.: MONITORING AND SYSTEM REVIEW STEPS

57. Findings from monitoring and system review and subsequent changes to the NFCS should be communicated effectively and efficiently to ensure the clear exchange of information and engagement between all **relevant** stakeholders in the NFCS.

Rationale: The EUMS propose to add to paragraph 57 the term "relevant" before "stakeholders", such as it is written in the paragraph 29. As a matter of fact, the monitoring of the performance and its results cannot be communicated to all stakeholders involved in all cases. The competent authority should define the degree of transparency in relation to the goal pursued.