March 2, 2010

Mr. Gregory Read
Codex Australia
Australian Government Department of Agriculture Fisheries and Forestry
GPO Box 858
Canberra ACT 2601
AUSTRALIA


The International Association of Consumer Food Organizations (IACFO) respectfully submits the following comments to the 18th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) with a request for appointment of IACFO to a working group described below.

IACFO has reviewed the Proposed Draft Principles and Guidelines for National Food Control Systems, Agenda Item 5, (CX/FICS 10/18/4, Dec. 2009) and believes it should be retained at Step 3 for further redrafting.

The Committee should provide for additional development of the document through appointment of a second working group. The purpose of this action is to allow the working group to strengthen the proposed draft with input from non-governmental organizations (NGOs) that can bridge national borders. IACFO requests appointment to the working group. We include organizations representing consumer interests on five continents working on nutrition, food safety, and related food policy matters. This uniquely positions IACFO with regard to development of international guidelines for establishing national food inspection systems.

IACFO appreciates the value of the work and the report of the physical working group that met in July 2009 as an excellent beginning to consideration of this text. We think that the text could be strengthened through the consideration of existing references on food control systems outside of Codex guidelines. The 2010 working group should be charged with reviewing guidelines that were prepared by other international food safety organizations. Examples of the documents the working group should be directed to review include the following:
IACFO believes development of principles and guidelines for national food control systems are important for a number of reasons. Not only can they contribute to improved safety for food in international trade, but they would also provide a critical template for assisting national governments in establishing effective systems for the safety of their citizens. This is especially true in the case of governments that do not have the resources or indigenous expertise to develop such a system. However, these guidelines need to be informed by the experience available from multiple regions and stakeholders with expertise in government systems.

If the Committee agrees to convening a 2010 Working Group, we respectfully request that IACFO be added to the list of participants.