

THE CODEX ALIMENTARIUS – FOOD SAFETY IN A GLOBAL MARKET

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FOOD-BORNE ILLNESSES

Food-borne illnesses are at best unpleasant - at worst they can be fatal. But there are other consequences. Outbreaks of food-borne illness can damage trade and tourism and can lead to loss of earnings, unemployment and litigation. Poor-quality food can destroy the commercial credibility of suppliers, both nationally and internationally, while food spoilage is wasteful and costly and can adversely affect trade and consumer confidence.

Table 1. Most important sources of food-borne illness reported by countries. by the origin of the problem (proportion of countries)

Source of Food-borne Illness	Country Income Level	%
Contamination/ infection at harvest	Low income	36.9
	Medium income	17.6
	High income	31.3
	Total	26
Contamination/ infection introduced during marketing	Low income	45
	Medium income	42.8
	High income	12.5
	Total	36.7
Contamination/ infection during processing	Low income	50
	Medium income	34.3
	High income	31.3
	Total	38
Contamination/ infection in the household (food storage and preparation)	Low income	44.4
	Medium income	70.6
	High income	37.6
	Total	55.9

CODEX ALIMENTARIUS

The Role of the Codex Alimentarius

The Codex Alimentarius Commission was created in 1963 by FAO and WHO to develop food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Program. The main purposes of this Program are protecting health of the consumers and ensuring fair trade practices in the food trade, and promoting coordination of all food standards work undertaken by international governmental and non-governmental organizations.

Strategic vision statement

The Codex Alimentarius Commission envisages a world afforded the highest attainable levels of consumer protection, including food safety and quality. To this end, the Commission will develop internationally agreed standards and related texts for use in domestic regulation and international trade in food that are based on scientific principles and fulfill the objectives of consumer health protection and fair practices in food trade.

General Principles of the Codex Alimentarius

A "Format for Codex Commodity Standards and their Content" is provided by the General Principles of the Codex Alimentarius. It includes the following categories of information:

- *Scope* - including the name of the standard;
- *Description, essential composition and quality factors* - defining the minimum standard for the food;
- *Food additives* - only those cleared by FAO and WHO may be used;
- *Contaminants*;
- *Hygiene and weights and measures*;
- *Labeling* - in accordance with the Codex General Standard for the Labeling of Prepackaged Foods;
- *Methods of analysis and sampling*.

In addition to commodity standards, the Codex Alimentarius includes *general standards*, which have across-the-board application to all foods and are not product-specific. There are general standards or recommendations for:

- food labeling;
- food additives;
- contaminants;
- methods of analysis and sampling;
- food hygiene;
- nutrition and foods for special dietary uses;
- food import and export inspection and certification systems;
- residues of veterinary drugs in foods;
- pesticide residues in foods.

The Present Scope of Codex Work and Codex Working Procedures

The Codex Alimentarius is a collection of internationally-adopted food standards presented in a uniform manner. The *Procedural Manual* of the Codex Alimentarius Commission states (p 28 English version):

"The Codex Alimentarius includes standards for all principal foods whether processed, semi-processed or raw for distribution to the consumer.....The Codex Alimentarius includes provisions in respect of food hygiene, food additives, pesticide residues, contaminants, labeling and presentation, methods of analysis and sampling.....Codex standards contain requirements for food aimed at ensuring for the consumer a sound, wholesome food product free from adulteration, correctly labeled and presented".

In practice, this means that Codex currently produces:

- food safety standards relating to maximum levels of pesticide residues, additives, contaminants (including microbiological contaminants) that can be present in foods;
- standards in the form of guidelines on processes and procedures (e.g. codes of practice, HACCP);
- labeling standards that may be health-related (e.g. allergens, nutritional labeling), for consumer fraud protection (e.g. weights and measures, date marking), or for consumer information (e.g. halal, organic labeling);
- commodity/product standards that define what a commodity is (e.g. species of sardines) or how it is made and what it may contain (e.g. cheddar cheese, corned beef); and
- quality descriptors as part of commodity standards which are often grading characteristics (e.g. color of different types of asparagus).

Member Country Acceptance of Codex Standards

The harmonization of food standards is generally viewed as a prerequisite to the protection of consumer health as well as allowing the fullest possible facilitation of international trade.

While the growing world interest in all Codex activities clearly indicates global acceptance of the Codex philosophy - embracing harmonization, consumer protection and facilitation of international trade - in practice it is difficult for many countries to accept Codex standards in the statutory sense. Differing legal formats and administrative systems, varying political systems and sometimes the influence of national attitudes and concepts of sovereign rights impede the progress of harmonization and deter the acceptance of Codex standards.

Despite these difficulties, however, the process of harmonization is gaining impetus by virtue of the strong international desire to facilitate trade.

Table 2. *Percentage of adoption of Codex standards by countries*

Codex Standard	Country Income Level	Adoption of Codex Standard (%)				
		0-20	21-40	41-60	61-80	81-100
Micro-biological	Low income	17.9	7.1	3.6	21.4	50.0
	Medium income	31.7	7.3	14.6	22.0	24.4
	High income	8.3	25.0	25.0	25.0	16.7
	Total	23.5	9.9	12.3	22.2	32.1

ISAH 2003, Mexico

Pesticides	Low income	20.7		13.8	31.0	34.5
	Medium income	17.1	14.6	12.2	14.6	41.5
	High income	23.1		15.4	38.5	23.1
	Total	19.3	7.2	13.3	24.1	36.1
Veterinary drugs	Low income	38.5		7.7	19.2	34.6
	Medium income	21.1	10.5	18.4	15.8	34.2
	High income	15.4		23.1	30.8	30.8
	Total	26.0	5.2	15.6	19.5	33.8
Contaminants	Low income	23.3		13.3	13.3	50.0
	Medium income	19.0	7.1	9.5	21.4	42.9
	High income	15.4	7.7	15.4	38.5	23.1
	Total	20.0	4.7	11.8	21.2	42.4
Additives	Low income	20.7	6.9	3.4	24.1	44.8
	Medium income	14.3	4.8	14.3	26.2	40.5
	High income	8.3	8.3	25.0	41.7	16.7
	Total	15.7	6.0	12.0	27.7	38.6
Labeling	Low income	12.9	6.5	6.5	29.0	45.2
	Medium income	11.6	2.3	11.6	41.9	32.6
	High income	8.3	8.3	8.3	50.0	25.0
	Total	11.6	4.7	9.3	38.4	36.0
Commodity/product	Low income	10.3	17.2	13.8	37.9	20.7
	Medium income	9.5	11.9	26.2	31.0	21.4
	High income	16.7	8.3	33.3	16.7	25.0
	Total	10.8	13.3	22.9	31.3	21.7
Inspection and certification	Low income	14.8	22.2	7.4	25.9	29.6
	Medium income	19.0	4.8	26.2	31.0	19.0
	High income	16.7		25.0	41.7	16.7
	Total	17.3	9.9	19.8	30.9	22.2

The Uruguay Round and World Food Trade

The volume of world food trade is enormous and is valued at between US \$300 billion and \$400 billion. The Uruguay Round Agreements represent a milestone in the multilateral trading

system because, for the first time, they incorporated agriculture and food under operationally effective rules and disciplines.

However, country participants in the round of negotiations recognized that measures ostensibly adopted by national governments to protect the health of their consumers, animals and plants could become disguised barriers to trade as well as being discriminatory. Consequently, the SPS and the TBT Agreements were included among the Multilateral Agreements on Trade in Goods, annexed to the 1994 Marrakech Agreement which established the World Trade Organization (WTO).

The Agreement on the Application of Sanitary and Phytosanitary Measures acknowledges that governments have the right to take sanitary and phytosanitary measures necessary for the protection of human health. However, the SPS Agreement requires them to apply those measures only to the extent required to protect human health. It does not permit Member Governments to discriminate by applying different requirements to different countries where the same or similar conditions prevail, unless there is sufficient scientific justification for doing so.

The Agreement on Technical Barriers to Trade seeks to ensure that technical regulations and standards, including packaging, marking and labeling requirements, and analytical procedures for assessing conformity with technical regulations and standards do not create unnecessary obstacles to trade.

It is noteworthy that the SPS and TBT Agreements both acknowledge the importance of harmonizing standards internationally so as to minimize or eliminate the risk of sanitary, phytosanitary and other technical standards becoming barriers to trade.

In its pursuance of harmonization, with regard to food safety the SPS Agreement has identified and chosen the standards, guidelines and recommendations established by the Codex Alimentarius Commission for food additives, veterinary drug and pesticide residues, contaminants, methods of analysis and sampling, and codes and guidelines of hygienic practice. This means that Codex standards are considered scientifically justified and are accepted as the benchmarks against which national measures and regulations are evaluated.

The adoption of Codex standards as scientifically justified norms for the purpose of the SPS and TBT Agreements is of immense significance. The standards have become an integral part of the legal framework within which international trade is being facilitated through harmonization. Already, they have been used as the benchmark in international trade disputes, and it is expected that they will be used increasingly in this regard.

Codex and the Ethics of International Trade

The work of the Codex Alimentarius Commission goes beyond creating means of removing barriers to trade. It also includes encouraging food traders to adopt voluntarily ethical practices as an important way of protecting consumers' health and promoting fair practices in the food trade.

The Commission has published the *Code of Ethics for International Trade in Food*, which is included in the Codex Alimentarius.

A principal objective of the Code of Ethics is to stop exporting countries and exporters from dumping poor-quality or unsafe food on to international markets. The code is currently being updated to reflect the impact of the SPS, the TBT and other agreements on international trade.

Codex and Regional Trade Agreements and Arrangements

Whereas in the past member governments of Codex were under no obligation to use Codex standards for domestic consumer protection or health, since the WTO SPS agreement of 1994, Codex has had legal status. While this does not require that all countries adopt all Codex standards, they must be able to justify non-adoption according to strictly-defined criteria. Legal recognition of Codex has given it greater relevance and importance, but has inevitably made compromise more difficult.

The Uruguay Round Agreements provide for groups of member countries to enter into trade agreements among themselves for the purpose of liberalizing trade. The North American Free Trade Agreement (NAFTA) between Canada, the United States and Mexico is such an agreement. Argentina, Brazil, Paraguay and Uruguay have signed the Treaty of Acunción establishing the Southern Common Market (MERCOSUR). In Asia and the Pacific, 18 countries have formalized economic cooperation arrangements under the title, Asia-Pacific Economic Cooperation (APEC) Council.

Food quality standards (standards concerning non-health related characteristics of a product) do not need to be developed by governments, they can be agreed between trading partners and, in a world trading system increasingly dominated by multinational food retailers, there is a tendency for establishment of standards without any public involvement. Nevertheless, companies continue to find value in harmonization of quality standards by bodies like ISO (e.g. for spices) and UN-ECE for fruit and vegetables. Codex too, is involved in setting quality standards and a major issue for Codex is to decide how high a priority this should be, particularly in light of Codex limited resources and its need to set health-related standards.

EVALUATION OF THE CODEX ALIMENTARIUS

(<http://www.fao.org/docrep/meeting/005/y7871e/y7871e00.htm>)

The Food and Agriculture Organization (FAO) and the World Health Organization (WHO) conducted a joint evaluation of FAO and WHO food standards program, including the Codex Alimentarius, so that the program best serves the concerns of all (the rich and poor) regarding health, safety and trade in food. This is the first evaluation process of the international food code, Codex Alimentarius, and its standard-setting mechanisms after 40 years of operations.

The evaluation team was asked to examine issues including, but not restricted to:

- the evolving context and challenges surrounding international food standards and their relevance in ensuring food safety, consumer protection, trade and economic development;
- the expectations of governments as to the validity, acceptability and institutional mechanisms for food standard setting within Codex;
- the particular interests and expectations of developing countries and of producers, industry and civil society concerning FAO and WHO food standards work;
- the effectiveness of existing institutional arrangements, management, methods of work and resources for international food standard setting within FAO and WHO; and
- on the basis of the above, make recommendations for improvement to the food standards work of WHO, FAO and Codex.

The following are excerpts from the "Evaluation".

The Roles of Food Standards

Governments have an obligation to protect the health of their citizens and this includes protection against food-borne illness for which publicly-set standards are necessary. However, standards do not protect consumers unless they are enforced through a properly functioning food control system. This needs many elements-comprehensive and current legislation, food monitoring and food-borne illness surveillance, licensing and inspection (which in turn requires educated and trained staff and good laboratory facilities), not to mention political and institutional support and stability, lack of corruption, etc. In these respects, responsibility rests squarely with individual countries.

There are, however, costs related to the improvement of governance and manpower and investments in the public and private sector infrastructures needed to implement standards. Cost implications in the implementation of standards are particularly important in developing countries and such countries may need financial assistance and training. They will also benefit from Codex principles and procedures for the recognition by countries of equivalence in food control systems.

As well as protecting consumers' health, food standards reduce the costs of doing business (e.g. the risk of fraud and costs of finding reliable trading partners). To be useful they must be meaningful to consumers and if so, they reduce consumers' risks (of inadvertently buying inferior quality as well as unsafe food). In providing benefits to both producers and consumers, standards promote economic welfare, thus they are considered by many economists to be a pre-requisite to the operation of a well-functioning market. If standards are harmonized (within or between countries), they naturally facilitate trade (domestic and international) and trade itself is generally judged to promote economic development.

As countries become richer and better educated, their consumers demand increased standards of quality and safety. This creates a possible difficulty for international harmonization of standards because it costs more for producers to meet higher standards and these costs get passed on to consumers who, in poor countries, might have other priorities (clean water, enough to eat [Governments in poor countries also have other, perhaps higher priority, health-related concerns such as AIDS, malaria and tuberculosis that demand their scarce resources.]). As an international standard setting body, one of the difficulties Codex faces is balancing the different needs of consumers in developed and developing countries. The balancing of the costs and benefits of incremental increases in food safety and quality is part of the process of risk management.

Links to OIE and IPPC

Food safety has become a food chain issue, in that plant and animal health at the primary production level (and even animal feed) can impinge upon safety of the final food (BSE and Listeria are obvious examples). New food safety organizations (e.g. the European Food Safety Authority) appear to be responding to what may have been a fragmented approach to food safety by covering the entire food chain within a single agency. Perhaps if an international system was being established from scratch, that would be the right approach now, but given the existence and widely divergent legislative bases of Codex, OIE and IPPC, developing more effective collaboration and cooperation is more realistic. Contacts between Codex and IPPC are facilitated by them both being housed in FAO and no overlaps were detected by the evaluation team.

There are gaps in standard setting that are not covered either by Codex or the OIE. The case of food safety standards relating to food-borne hazards arising from animals before slaughter is one. In this regard, the OIE Committee has recently adopted a resolution clarifying the food safety

mandate of the OIE ("reduce food-borne risks to human health due to hazards arising from animals, in collaboration with appropriate international agencies"). The resolution promotes the establishment and/or the strengthening of both formal and informal relationships with relevant international agencies, including FAO and WHO and their subsidiary bodies, including CAC. We have already recommended above that the Codex mandate reflect this.

The Chairman of Codex and the Director-General of OIE have recently held informal discussions to identify and consider appropriate collaboration in areas of their respective competence. Mechanisms they envisaged for improving cooperation between Codex and OIE were exchange of information; cross-utilization of experts in working groups and relevant conferences; and conduct of a census to facilitate the comparison of existing OIE/Codex standards on the same subjects. Informal agreement between the two parties has not been formalized. The following areas of common interest have been identified:

- risk analysis;
- certification of exported products of animal origin and efficiency of the services in charge of certification;
- safety of animal feed;
- inspection of products of animal origin including at farm level;
- the safety of products of animal origin with regard to residues of veterinary drugs;
- thermal treatment methods for milk so as to reduce pathogens;
- application of biotechnology: vaccines, veterinary drugs and biological tests; and
- traceability of products of animal origin.

Based on these findings the following recommendations were made: Codex and OIE should intensify their collaboration to minimize overlaps and avoid gaps in standard setting with:

- a) delineation of work and specific modalities of collaboration should be defined by Codex and OIE within the near future and formalized in a memorandum of understanding;*
- b) where work is in both Organizations' interest it should be pursued through joint task forces.*

Continued close collaboration between Codex and IPPC should also be maintained.

Administrative structures

Particularly in some developed countries that were visited, the view was expressed that Codex must be run more like a business-that at present it is overly bureaucratic and insufficiently strategic. Some wanted an executive chairman assisted by a board of directors. Others saw this as creating difficulties with respect to transparency, inclusiveness and accountability to all members.

A common view from country visits, particularly from high-income countries, was that the CAC meeting only every two years is a serious impediment to speedy decision making. Coupled with sometimes poor sequencing of committee meetings (including the sequencing of meetings of JECFA and JMPR to give expert scientific advice to relevant committees), long delays are built into the system.

Based on these findings the following recommendations were made: The Executive Committee should be replaced with an Executive Board, meeting every six months, charged with strategic and managerial responsibility but without the authority to consider standards. The function of the board would be to improve speed and efficiency by assisting the Commission in strategic planning, budgeting and monitoring, including:

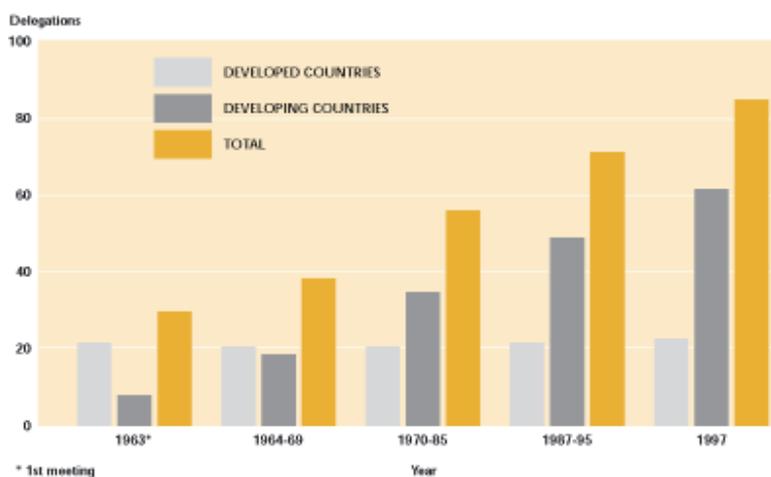
- *preparation of the work plan and budget and the medium-term plan;*

- *make recommendations to improve management and working procedures in Codex, including its committees and task forces; and monitor and take corrective action for the delivery of the program of work.*

Codex Regional Structure and the Regional Committees

The regional committees are appreciated and attendance by low- and middle-income countries at regional coordinating committee meetings is significantly higher than at the Commission itself and some countries participate in Codex meetings only at the regional level. However, this is clearly one area of Codex where improvements need to be made if the developing country governments and NGOs are to make a more effective input into Codex.

Figure 1. *Who comes to Codex?*



Regional meetings also often facilitate capacity building activities (e.g. workshops by the host country and FAO/WHO immediately before meetings). If Codex is to give advice to FAO and WHO on capacity building priorities, this could usefully be an issue for committee meetings, but to do this they require greater focus on regional issues

However, problems have been identified with regard to the effectiveness of regional committees. They often lack clear purpose and:

- some of the regions are regarded as too large and diverse to have real opportunity to work together (Africa; Asia; Latin America and the Caribbean; and to a lesser extent Europe);
- there are inadequate resources to permit regional representatives and coordinators to work between regional meetings; and
- there is need for greater mobilization of support through Codex for the initiatives of developing regions.

Based on these findings the following recommendations were made: Codex should undertake a review of the mandate and work of regional committees within the next two years.

In undertaking this review, the following should be considered:

- whether all the existing regional committees continue to be justified (e.g. with EU enlargement);
- clarification of their purpose and mandate (which may not need to be uniform for developed and developing country groupings);
- establishment of a flexible (ad hoc) sub-regional structure within the regions, centered on economically and geographically coherent groups including economic organizations like Mercosur and SADC. This could encourage the development of more joint work on common problems and allow for greater participation in local meetings;
- combining the roles of regional representative and regional coordinator. This person would represent the region at the Executive Board. The representative/coordinator would be the secretary to the regional committee. Where this person is from a developing country, possible ways of funding expenses for carrying out coordination and promotional activities should be explored by Codex; and
- in developing regions, systematic discussion of capacity building and further combination of meetings with seminars and briefings on matters related to both trade and protection of domestic consumers.
- These proposals should be considered alongside specific proposals for improved decision making below that would also enhance the regional or sub-regional voice in Codex committee meetings.

Clarification of the distinction between risk assessment and risk management

Codex, FAO and WHO have been working to clarify this distinction. It was proposed to have further and clearer division of risk assessment (scientific advice from expert committees and consultations) and risk management (the work of the Codex committees) which should simplify the work of Codex committees. Many of the delays in committee work result from a discussion of risk assessment issues in Codex committees (essentially using quasi-scientific arguments to justify positions driven by other concerns). The proposal in the section on expert advice would have the expert committees and consultations producing clear MRLs and ADIs and alternative risk management options, as requested by the risk managers.

If Codex is successful in developing procedures for determining acceptable levels of protection, the scientific advice given to different committees will be consistent in terms of the implied level of consumer protection. The Codex committees would then discuss management options. Any divergence from the scientific advice with regard to health risk would need to be clearly and transparently justified on the basis of other legitimate factors and any disagreement with scientific advice would result in issues being sent back to expert committees/consultations rather than be discussed by non-experts in Codex committee time. Effective communication (and trust) between risk managers and assessors is vital to the success of these proposals.

This is particularly the case as the demands on risk managers are increasing and they are asked to weigh the costs and benefits of any risk management option. Sometimes the costs are economic or political, but sometimes they may involve trade-offs between alternative risks, such as when a certain level of protection against a hazard would reduce the availability or make unaffordable a food of important nutritional value to a population or sub-population.

Based on these findings the following recommendations were made: Codex must continue to strive for a clearer separation of the risk management and risk assessment functions to ensure transparency, the usefulness of scientific advice and the speed of decision-making.

The need to give developing countries preferential attention in the work of Codex was also spelled out by WHO and FAO. At the 23rd Session of the Commission (June/July 1999) among others the following recommendations to be applied in the framework of Codex were adopted (<http://www.fao.org/docrep/003/x7354e/X7354e10.htm>)

- Programs that contribute to risk analysis should have high priority;
- Recognizing that primary production in developing countries is largely through small and medium enterprises, risk assessment should be based on global data, including that from developing countries. This data should particularly include epidemiological surveillance data and exposure studies;
- Risk management should take into account the economic consequences and the feasibility of risk management options in developing countries. Risk management should also recognize the need for flexibility in the establishment of standards, guidelines and other recommendations, consistent with the protection of consumers' health.

Greater Influence in Codex Decision Making for Developing Countries

There is widespread agreement of the need for the fullest participation of members in Codex and it is considered that at present poorer countries and, to a lesser extent, those with limited importance for trade, have too little involvement and influence. Many countries outside of North America, Australasia and the European Union feel that it is difficult to make their voices heard in Codex. Governments in low-income countries do not always consider attendance at Codex meetings a high enough priority among many pressing demands for resources.

Developing countries highlighted financial resources as overwhelmingly the main barrier to their fuller participation in Codex and accorded relatively little importance to time constraints for senior staff, shortage of qualified personnel, language difficulties or visa problems. [They accorded slightly more importance to difficulties with electronic communication.] We think that Codex reliance on meetings as the main way of developing standards is a contributory factor and the greater use of facilitators to consult members and of correspondence and small local workshops in the development of standards will help alleviate this problem.

The efforts underway in Codex to facilitate attendance at meetings by developing countries, in particular the "trust fund", are very important, but possibly more important is facilitating the enhancement of national capacity.

The Codex regional structure and committees have been discussed above and it is believed that greater inclusiveness can arise through more homogeneous groupings of countries focusing on common issues. Such work allows expertise to be brought together by countries which cannot adequately tackle issues on their own. Codex does not presently accept multiple accreditation at meetings (i.e. one delegation speaking for several countries), and the objections to formal multiple accreditation are recognized. Informally though, procedures whereby groups of members coordinate their positions and communicate these to facilitators and during committee meetings (as is already done by certain groups e.g. the EU and Quads for Codex and is widespread in FAO forums) is encouraged. This would not extend to voting at the Commission.

Based on these findings the following recommendations were made: Groups of countries with common interests should be encouraged to coordinate their positions and present these as positions of the group at committee meetings.

The Codex and FAO/WHO emphasis on the establishment of national committees has had benefits in involving civil society at the local level which go beyond Codex and extend to national food safety networks. The better operating national committees in developing countries have made a significant contribution to the improvement of national legislation and food control systems.

As documents and communication are increasingly electronic, contact points in some countries are severely disadvantaged by lack of (or sharing of) computers and difficult web access (over unreliable and slow phone lines). Codex members and FAO and WHO could usefully give priority to assuring that the Codex contact point has adequate internet access and training to receive all documents and transmit responses where local infrastructure permits.

Members' Needs and the Emphases of the FAO and WHO Programs

One striking observation from country visits was the high importance of capacity-building activities when international trade and economic returns are at stake. For instance, the large volume of assistance in the area of HACCP in fisheries has been driven by the economic losses for exporting developing countries following non-compliance with requirements imposed by importing developed countries. This corroborates Table 3's evidence that trade facilitation is seen as the most useful function of Codex standards in low-income countries.

Table 3. Percentage of respondents to the Codex evaluation question: *In which ways are Codex Standards important for your Country?*

Codex Standard	Country Income Level	Level of Importance (% Respondents)		
		Low	Medium	High
Protect Health of Domestic Consumers	All Countries	2.0	22.0	76.0
	Low	2.9	11.1	86.0
	Middle	0	17.3	82.7
	High	5.3	52.7	42.1
Facilitate Domestic Commerce	All Countries	8.6	40.5	51.0
	Low	8.6	20.0	71.5
	Middle	2.2	44.4	53.3
	High	21.1	68.4	10.6
Facilitate Food Exports	All Countries	0	23.0	77.0
	Low	0	8.6	91.4
	Middle	0	29.6	70.5
	High	0	33.3	66.7
Ensure Safety of Food Imports	All Countries	1	16.7	82.3
	Low	0	11.4	88.6
	Middle	0	21.7	78.3
	High	4.8	14.4	80.9

Scale: Not Important = scores of 1 or 2, Medium Importance = 3, 4 or 5 and Very Important = 6 or 7

Just as economic priorities have defined the need for technical assistance in HACCP, economic necessity has affected the priority accorded to domestic food safety issues in low-income countries. Although some WHO regional strategies give high priority to food safety, WHO field officers recognize the difficulties in putting food safety on top of the list of country priorities. With limited financial and personnel resources, Ministries of Health have prioritized other initiatives such as malaria, tuberculosis and AIDS which may continue to be more important for health than food-borne illness. Anecdotal evidence from country visits, as well as a review of the responses to the questionnaire, make evident, however, that there is a crucial need to improve knowledge on food-borne illnesses in developing countries and thus, for the establishment of proper surveillance systems and data bases. In questionnaire responses on priority areas for assistance, developing countries mentioned the development of surveillance of food-borne illnesses as one of the very important areas (82% of respondents). Furthermore, 53% of the least developed countries (LDCs) which have responded do not have a food-borne illness surveillance system and country visits revealed that even when they exist, the systems are often weak.

Other priority areas for capacity-building assistance (as per replies to the questionnaire) [82.6% and 80.5% of respondents mentioned respectively risk analysis, including data and food safety inspection, surveillance and monitoring as priority areas for assistance.] include increased training in risk assessment as well as food safety inspections, surveillance and monitoring. This reflects areas where capacity is the weakest (again as per replies to the questionnaire) for both low- and middle-income countries, although for the latter, to a lesser extent. The greatest weaknesses that need to be addressed in capacity-building activities are in the areas of risk assessment and risk communication for both low- and middle-income countries. For low-income countries, domestic retail food inspection is also rated as very weak and in need of capacity building.

The development of legislation is not perceived by developing countries as a very high priority for assistance as compared to other areas. This may be because food laws are ineffective in the absence of surveillance and enforcement capability. Country visits showed how multiple jurisdictions, overlapping and outdated legislation hampered the effective regulation of food. The visits also demonstrated that LDCs need a better basis in enforceable law to tackle their immediate food safety and trade problems. This cannot be achieved by only translating Codex standards into national law.

Results of the questionnaire also point out the need to involve all stakeholders (consumers, wholesalers, retailers and local processors) in support of the setting up of institutional frameworks for health surveillance, regulatory and law development and enforcement. Educating consumers, food processors and food retailers is perceived by developing countries as important to improve the health of their consumers (in addition to strengthening risk analysis). It is believed that if institutional frameworks rely only on the civil service, they will not reap the benefits of civil society ownership and will provide opportunities for corruption by civil servants and non-compliance with the law.

Overall, priority areas as perceived by the beneficiary countries thus confirm the relevance of capacity-building activities described below carried out by FAO and WHO. In the delivery of capacity-building assistance, there is a clear preference for receiving assistance through technical cooperation projects, including equipment, rather than *ad hoc* short-term consultancy, meetings and workshops. Projects beyond a certain scale ensure better follow-up, better targeting and therefore more sustainable outcomes.

At the moment, there is thus a stark contrast between developing countries' stated priorities for development assistance in food safety and the volume of voluntary contributions by developed

countries which share those priorities. The reasons for this include the focus of many government aid programs on the poorest countries and the poor within those countries. In the case of FAO (no similar data is available for WHO), the ratio of voluntary funding (trust funds) for food safety development assistance to assessed contributions (Regular Program) is 0.1:1. The comparable ratio for the overall FAO technical program is 1.5:1. FAO's capacity-building support is thus nearly entirely funded by its own resources.

Developed and medium-income countries' responses to the questionnaire indicated that many of them were prepared to increase their development assistance. Their priorities for subject matters of assistance were largely in line with the responses of the developing countries on their requirements, but there was more emphasis on the provision of consultancy and workshops and less on equipment. Fellowships were not a priority of the developed countries.

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The Codex Alimentarius pages on the World Wide Web make it is easy to follow the activities of the Codex Commission and its subsidiary bodies.

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Figure 2. Organizational Structure of Codex

