



GROCERY MANUFACTURERS OF AMERICA
MAKERS OF THE WORLD'S FAVORITE BRANDS OF
FOOD, BEVERAGES, AND CONSUMER PRODUCTS

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U.S. Department of Agriculture
Food Safety and Inspection Service
Room 102
Cotton Annex
300 12th Street, SW
Washington, DC 20250-3700

99-030N
99-030N-1
Lisa D. Katic

Re: Codex Alimentarius Commission: Sessions of the Executive Committee and the Codex Alimentarius Commission (Codex); 64 Fed. Reg. 27955 (May 24, 1999) [Docket No. 99-030N]

The Grocery Manufacturers of America's (GMA) is the world's largest association of food, beverage and consumer product companies. With U.S. sales of more than \$450 billion, GMA members employ more than 2.5 million workers in all 50 states. The organization applies legal, scientific and political expertise from its member companies to vital food, nutrition and public policy issues affecting the industry. Led by a board of 44 Chief Executive Officers, GMA speaks for food and consumer product manufacturers at the state, federal and international levels on legislative and regulatory issues. The association also leads efforts to increase productivity, efficiency and growth in the food, beverage and consumer products industry. Below are GMA's comments regarding specific agenda items to be considered at the Executive Commission meeting.

Agenda Item 6: Consumers' Involvement in the Work of the Codex Alimentarius Commission, Alinorm 99/8

GMA agrees that participation of NGOs at both the national and international levels is important to the work of Codex Alimentarius. Each type of NGO brings its particular type of experience and expertise to Codex. Alinorm 99/8, para 21, lists several recommendations for consideration by the Commission for consumer NGOs. GMA strongly emphasizes that any considerations and privileges for NGOs should be provided to all NGOs. We therefore agree with the U.S. position that most of the recommendations in para 21 should be referred to the Codex Executive Committee before being discussed in the Commission. The Executive Committee provides an efficient forum to consider the issues before bringing them to the full Commission for lengthy debate.

Although all of the recommendations have important implications, GMA is commenting on three specific recommendations; namely, (d), (f), and (h).

Recommendation (d): *Identifying successful trust funds at the national or international level that could serve as models for obtaining resources needed to support expanded participation of independent consumer NGOs in Codex. Funding sources are needed that do not compromise the independence of consumer NGOs.*

GMA appreciates the fact that resource limitations, especially financial constraints, often result in many organizations and countries not attending Codex meetings. We believe that emphasis should be placed on getting maximum involvement of developing countries in Codex activities. Therefore, if Codex is going to make efforts to find money or identify sources of money to assist organizations and countries, the first priority for assistance should be member countries that do not have the financial resources to attend meetings and otherwise fully participate in Codex proceedings.

With specific reference to national governments providing funds to consumer NGOs, we question whether a government should provide funds to organizations that will, in turn, be lobbying the government on issues that are directly related to the funding.

Recommendation (f): *Opportunities for training of consumer NGOs in how to participate effectively in Codex processes, and for training governments in how to enhance openness of processes to such participation.*

Almost all NGOs could benefit from training in effective participation in Codex processes. If such training is made available by Codex, the opportunity should be available to all NGOs and member countries. If training is provided by national governments, it should be open to all NGOs as well as to other members of the public who would like to be more effective in their Codex activities.

Recommendation (b): *Request the CCGP to develop proposals that would allow a limited number of observers representative of the NGOs in Observer Status with the Codex Alimentarius Commission to be invited to sessions of the Executive Committee.*

GMA supports the U.S. position that the current rules, composition and attendance of the Executive Committee assures an effective and efficient CCEXEC. The CCEXEC has been productive and effective within these rules. GMA does not believe that limited participation of NGOs in CCEXEC is a valid process. Identification of selected NGOs to attend CCEXEC meetings would deny equal privileges to other NGOs. In addition, there is no practical method to select "representative" NGOs. If the CCEXEC is open to any NGOs, it must be open to all. However, this could increase the size of CCEXEC meetings to the size of some Committee meetings, making the CCEXEC less efficient; thus negating the advantages of the CCEXEC. Finally, decisions made by CCEXEC are submitted to the Commission for approval; therefore, all interested parties have the opportunity for input.

Agenda Item 7: Principles of Risk Analysis, Alinorm 99/9

GMA agrees that the Commission should continue its work to incorporate the principles of risk analysis in the operations of Codex Alimentarius. Para 25 of Alinorm 99/9 contains several recommendations that the Commission should consider adopting to further its work in this area. GMA is commenting on one of these recommendations, specifically "*(h) Relevant Codex Committees should consider developing quality criteria for data used for risk assessment. To the extent possible such criteria should be consistent with one another, taking into account the technical differences in the disciplines covered.*"


GMA suggests that when considering this recommendation, the roles of expert panels such as JECFA and JMPR, Codex Committees, and national governments be clearly defined. GMA believes that expert panels such as JECFA and JMPR should be the risk assessors and that the support of Codex Committees should provide, in consultation with the expert panels, policy guidelines and criteria for the data used in risk assessments. The Committees could also develop criteria to assist national governments in making the risk management decisions. The ultimate risk managers should be national governments. This would permit governments to manage risk based on the individual needs of the country.

Agenda Item 10: Consideration of Proposals to Elaborate New Standards and/or Related Texts Alinorm 99/21, Part II -- New Work, Codex Coordinating Committee for Europe

GMA questions the ramifications of establishing draft revised European Regional Standards for Mayonnaise and Vinegar. The Codex Committee on Fats and Oils agreed to discontinue work on conversion of the European Regional Standard for Mayonnaise to a world-wide standard when the Committee reached an impasse on specific conditions of the standards, and the Codex Committee on Processed Fruits and Vegetables decided not to proceed with the conversion of the Regional Standard for Vinegar into a world-wide standard. There should be assurance that Regional Codex Standards would be used as guidance for the Region and would not be used as references in any WTO deliberations.

GMA appreciates this opportunity and hopes the comments are helpful. If I can be of any assistance, please call 202/295-3946.

Sincerely,



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