

INTRODUCTION

1. The Codex Committee on Food Import and Export Inspection and Certification Systems held its twenty-seventh session (CCFICS27), from 16 to 20 September 2024, in hybrid format, at the kind invitation of the Government of Australia. Mr Tom Black, First Assistant Secretary, Exports and Veterinary Services, Department of Agriculture, Fisheries and Forestry, Australian Government, chaired CCFICS27. The session was attended by 70 Member Countries, one Member Organization and 11 Observers organisations and United Nations agencies. The list of participants is contained in Appendix I.

OPENING OF THE SESSION

2. Mr Gavin Singleton from the Yirrganydji Traditional Custodians provided a welcome to Country.
3. The Honourable Julie Collins, Australian Government Minister for Agriculture, Fisheries and Forestry, opened the meeting and welcomed participants to CCFICS27. The Minister highlighted the important role of CCFICS in effectively responding to the global challenges in food production and food trade that will support consumer confidence in the food supply and the achievement of the Sustainable Development Goals. The Minister confirmed Australia's commitment to hosting CCFICS.
4. The Secretary of the Department of Agriculture, Fisheries and Forestry, Mr Adam Fennessy, also addressed the delegates and highlighted CCFICS's contributions to the strengthening of national food control systems and ensuring fair practices in the food trade.
5. Ms Catherine Bessy, Senior Food Safety Officer, Food Systems and Food Safety Division of the Food and Agriculture Organization of the United Nations (FAO) and Dr Akio Hasegawa, Technical Officer of the World Health Organization (WHO) delivered opening speeches on behalf of FAO and WHO, respectively.
6. The meeting was also addressed by Mr Raj Rajasekar, Vice-Chairperson of the Codex Alimentarius Commission (CAC), and Ms Sarah Cahill, Codex Secretary.
7. Ms Sharon Winsor, Weilwan woman and founder of Indigiearth, gave a talk about the important role of indigenous foods and indigenous culture as part of agrifood systems.

Division of competence¹

8. CCFICS27 noted the division of competence between the European Union (EU) and its Member States, according to paragraph 5, Rule II, of the Rules of Procedure of the Codex Alimentarius Commission (CAC).

ADOPTION OF THE AGENDA (Agenda item 1)²

9. CCFICS27 adopted the provisional agenda as the agenda for the Session and agreed to consider a proposed amendment to the *Principles and Guidelines on the Use of Remote Audit and Inspection in Regulatory Frameworks* (CXG 102-2023) (CRD05) under Agenda item 10 (Other business), subject to availability of time.

MATTERS ARISING FROM THE CODEX ALIMENTARIUS COMMISSION AND ITS SUBSIDIARY BODIES (Agenda item 2)³

10. The Codex Secretariat introduced the item.
11. CCFICS27 noted the matters for information as well as the matter highlighted for action.
The delegation of Norway drew the attention of CCFICS27 to their comments contained in CRD05 on the proposal to amend CXS 102-2023, Section 6 paragraph 3, which CCFICS27 had already agreed to consider under Agenda Item 10, Other business.

Conclusion

12. CCFICS27:
 - i. Noted the matters for information from the Codex Alimentarius Commission and its subsidiary bodies
 - ii. Encouraged Members to take on leadership roles in the electronic working groups (EWGs) and the updating of the emerging issues paper; and respond to the circular letter (CL) on the Codex strategic plan 2026-2031.
 - iii. Noted that in light of the withdrawal of ISO 8402 – referenced in the CCFICS terms of reference in the Codex Procedural Manual – and the ongoing revision to ISO 9000:2015 that has replaced ISO

¹ Division of competence between the European Union and its Member States (CRD01).

² CX/FICS 24/27/1; CRD04 (Kenya, Rwanda, United Republic of Tanzania, East African Community); CRD05 (Norway)

³ CX/FICS 24/27/2; CRD5 (Kenya, Norway, Rwanda, Singapore, United Republic of Tanzania, East African Community)

8402, the Codex Secretariat would, as soon as the ongoing revision to ISO 9000 is completed, propose an editorial amendment to the footnote on “quality assurance” associated with the terms of reference for CCFICS, which would be forwarded to CAC for approval.

INFORMATION ON ACTIVITIES OF FAO AND WHO AND OTHER INTERNATIONAL ORGANIZATIONS RELEVANT TO THE WORK OF CCFICS (Agenda item 3)⁴

13. The representatives of FAO and WHO provided information on their activities
14. The Representative of FAO introduced CX/FICS 24/27/3, highlighting the rapid development and success of the national food control system assessment programme, using the FAO/WHO tool, currently implemented by the two agencies. The Representative also reported on the work ongoing on food fraud, including the joint activities with the FAO/International Atomic Energy Agency (IAEA) Centre of Nuclear Techniques in Food and Agriculture on food authenticity. The Representative illustrated the close interconnections of FAO's food safety capacity development programme with Codex, and more specifically CCFICS texts, to assist countries strengthen their food safety legislation, as well as their risk-based inspection programmes. The Representative also indicated that FAO and WHO had developed a framework for coordination for food safety, paving the way for implementation of their respective food safety work with a common vision; food safety at all times.
15. The Representative of WHO reported on the recent and ongoing activities related to the FAO/WHO International Food Safety Authorities Network (INFOSAN), World Food Safety Day, and Standards and Trade Development Facility (STDF). The Representative also highlighted the WHO initiatives including the activities for promoting INFOSAN and strengthening food safety emergency response capacity of Members.
16. The United Nations Industrial Development Organization (UNIDO) shared information about their activities relevant to CCFICS, including on voluntary third-party assurance programs.
17. The Organisation for Economic Cooperation and Development (OECD) provided an update on recent OECD work on Sanitary and Phytosanitary (SPS) digital tools including on costs, benefits and effectiveness of remote audit and the current use of SPS e-certificates.
18. Concerning SPS e-certificates, a Member informed that the World Organization for Animal Health (WOAH) had started data modeling of WOAH certificates, and that the result of this work was expected to be published towards the end of 2024.

Conclusion

19. CCFICS27:
 - Thanked the FAO and WHO and other international organisations for their updates.
 - Noted the information provided and their technical support towards capacity development in developing countries.
 - Noted the important work of the food control system assessment program using the FAO/WHO tool that drew heavily on CCFICS guidance.

DRAFT CONSOLIDATED CODEX GUIDELINES RELATED TO EQUIVALENCE (Agenda item 4)⁵

20. New Zealand, as chair of both the EWG and the Physical Working Group (PWG) introduced the EWG and the PWG report and highlighted that a broad agreement was reached on the structure of the consolidated guideline.
21. CCFICS27 noted the importance of the consolidation work along with the following general comments as expressed by delegations:
 - The language in the draft consolidated guidelines related to equivalence should closely align with that used in the *Guidelines on Recognition and Maintenance of National Food Control Systems* (CXG 101-2023), and it should be clear and easy to understand..

⁴ CX/FICS 24/27/3; CX/FICS 24/27/3 Add. 1; CRD6 (Kenya, Rwanda, United Republic of Tanzania, and East African Community); CRD17 (African Union)

⁵CX/FICS 24/26/4; CX/FICS 24/27/4 Add.1, CRD2 (Report of Physical Working Group), CRD7 (Ghana, Japan, Kenya, Morocco, Nigeria, Republic of Korea, Rwanda, Thailand, United Republic of Tanzania and East African Community), CRD14 (Electronic Working Group); CRD16 (Egypt); CRD17 (African Union); CRD18 (Panama); CRD19 (India); CRD20 (Burundi); CRD21 (Indonesia); CRD22 (Senegal); CRD23 (Malaysia)

- There was a need to ensure that once finalised, the consolidated document would appropriately reflect the concepts laid down in the *Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems* (CXG 101-2023), the *Guidelines for the Development of Equivalence Agreements Regarding Food Import and Export Inspection and Certification Systems* (CXG 34-1999), and the *Guidelines on the Judgment of Equivalence of Sanitary Measures Associated with Food Inspection and Certification Systems* (CXG 53-2003).
- There was a need to clarify the status of the above mentioned three documents after the consolidation exercise had been completed.
- As some of the texts in CXG 101-2023 had not been fully transferred, a detailed analysis of each of the three Codex guidance documents being consolidated had to be undertaken to identify whether the concepts in relevant paragraphs were reflected in the draft consolidated document. The analysis would facilitate the progress of the consolidation and decision making by CCFICS regarding the status of existing Codex equivalence texts.
- The importance of ensuring that all the key concepts of the existing equivalence texts are appropriately reflected in the guideline was reiterated.
- Consolidation of the existing texts should not create unnecessary burden for competent authorities to establish and maintain equivalence agreements.
- There was a need to ensure that the terms used in the guidelines were harmonised to ensure clarity and avoid confusion. A number of terms were used in the text when referring to measures, some examples include: conditions of trade, requirements, requirements for trade, specified measures and specific measures.

22. There was discussion about whether to include equivalence provisions for sanitary measures and technical regulations from the World Trade Organization (WTO) SPS and Technical Barriers to Trade (TBT) Agreements. It was noted that this could be possible, but should be done in a transparent manner.

23. CCFICS27 considered the draft document section by section and made the following specific comments:

Title of the principles and guidelines

24. CCFICS27 exchanged views on the use and/or the meaning of the term “specified measure” as included in the title of the consolidated Codex text. It was observed that the term covered both sanitary measures and technical requirements. To ensure clarity, it was agreed to amend the title to “Principles and guidelines for the recognition of equivalence of sanitary measures, technical regulations or the whole or a part of national food control systems”

Section 1: Preamble

25. CCFICS27 considered the preamble and made the following amendments to the text:

Paragraph 1

- The paragraph was redrafted to reflect the purpose of equivalence agreements.

Paragraph 2

- The paragraph was amended to replace the term “specified measures” with “sanitary measures and technical regulations, as appropriate”, and the following explanatory note was inserted to clarify the meaning of the term “technical regulations”.

“Explanatory note: Technical regulations can include technical regulations, conformity assessment procedures or standards”

Paragraph 3

- The paragraph was amended to clarify that the recognition of equivalence may result in the more efficient and effective use of resources in both importing and exporting countries.

Paragraph 4

- The following new paragraph from the preamble of paragraph 3 of CXG101-2023 was included:

“The consideration, assessment, recognition, and maintenance of the equivalence of one country’s NFCS in whole or the relevant part is independent of any reciprocal process occurring. Reciprocal considerations, where requested, may have different scopes and durations, and may also arrive at different conclusions.”

Section 2: Purpose

26. The following amendments were made:

- Paragraph 1 from CXG 34-1999 was included to provide for other less formal agreements:

“This document provides practical guidance for governments desiring to enter into bilateral or multilateral equivalence agreements concerning sanitary measure(s) or technical regulations or the whole or a part of a NFCS. Such agreements may be binding instruments taking the form of “international agreements” under the Vienna Convention on the Law of Treaties, or they may be other less formal arrangements such as exchange of letters or memoranda of understanding.”
- The footnote was consequentially deleted as a result of the above-added new paragraph, to avoid repetition of information.

Section 3: Scope

27. CCFICS27 edited the paragraph to ensure linguistic consistency and harmonisation.

Section 4: Definitions

28. CCFICS27 made the following amendments:

- Inserted a definition for Appropriate Level of Protection (as contained in CXG 53-2003) and placed the definition in square brackets:

“[Appropriate level of sanitary protection (ALOP): The level of protection deemed appropriate by the country establishing a sanitary measure to protect human life or health within its territory. (This concept may otherwise be referred to as the “acceptable level of risk” .)]”
- Edited the definition for requirements as follows:

“Requirements: are the criteria set down by the competent authorities relating to trade in food covering the protection of the health consumers and ensuring fair practices in the food trade.”
- Deleted the definitions for the terms “measure”; “NFCS objective”; “Sanitary measure” and “Technical measure”.

Section 4: Principles

29. CCFICS27 made the following amendments:

C: Scope of the request and assessment

- Edited the explanatory text for the principle by inserting the following sentence at the end of the paragraph : “and should be agreed between importing and exporting countries”.

F: Demonstration of Equivalence

- Edited the title of the principle to include the word “recognition” i.e. “*Demonstration and Recognition of Equivalence*” and included a new first sentence of the explanatory text of the principle:

“The exporting country should objectively demonstrate that its measures, technical regulations, NFCS or relevant part, achieve the importing country’s objectives”.

Section 6: Initial Discussions

30. CCFICS27 noted that the concepts outlined in paragraphs 10 and 11 were similar to those in paragraphs 9 and 12 respectively, and agreed to delete paragraphs 10 and 11 to avoid repetition.

Appropriateness of an equivalence process*Paragraph 12*

31. CCFICS27 amended:

- bullet point 1 by deleting the words “for trade” and “unnecessarily”; and
- bullet point 2 by inserting the term “exporting country”.
- Bullet point 3 by replacing with “which of the importing country’s measures would be met by compliance and for which measures would the exporting country seek equivalence”.

32. The following two new bullet points were inserted, and square bracketed for further consideration:

[As agreed by the parties, an equivalence agreement covering control and certification systems may relate to any aspect of food safety or other relevant requirement for food. Such agreements may be limited to

specific areas of trade or specific products. Such agreements may be entered into where equivalence has been established in respect of some or all requirements] (source is CXG 34-1999, paragraph 5)

- [Equivalence agreements may include provisions for certificates or other forms of certification of particular traded products or may provide for dispensing with certificates and other forms of certification] (source is CXG 34-1999, paragraph 5)

33. Following extensive discussion and noting that the availability of time could not allow consideration of sections beyond paragraph 12, bullet point 5, the Chairperson of CCFICS closed the CCFICS27 plenary discussion on this matter with further consideration of the text to be undertaken in the EWG.

Conclusion

34. CCFICS27, in light of the extensive discussions and comments made and the need for outstanding issues to be resolved, agreed:
- a) to return the proposed draft consolidated guidelines related to equivalence at Step 2, for redrafting and circulation for comments at Step 3;
 - b) establish an EWG, chaired by New Zealand, and co-chaired by Kenya, and open to all Members and Observers, working in English, to consider outstanding issues, taking into account the comments made during the plenary discussions, the written comments contained in CX/FICS 24/27/4 Add.1, and the relevant CRDs;
 - c) to encourage the EWG to seek multiple rounds of comments as necessary with a view to resolve all the outstanding issues;
 - d) that the report of the EWG would be submitted at least three months prior to CCFICS28;
 - e) to keep open the possibility of virtual or physical WG meetings, open to all Members and Observers, between sessions, and a PWG immediately prior to CCFICS28 if required.
35. CCFICS27 requested the EWG to consider the *Guidelines on Recognition and Maintenance of Equivalence of National Food Control Systems (NFCS)* (CXG 101-2023) as the basis for the continued drafting of the process steps in the guideline.

DRAFT GUIDELINES ON PREVENTION AND CONTROL OF FOOD FRAUD (Agenda item 5)⁶

36. The United States of America as Chair of the EWG introduced this item.
37. The Chairperson of CCFICS invited general comments before opening a discussion of the document paragraph by paragraph.
38. CCFICS27 noted the following general views:
- a. There was general agreement on the importance of progressing this work.
 - b. The guidelines would support the establishment of measures for prevention and mitigation of food fraud and the protection of food integrity, especially in developing countries.
 - c. Concerns were expressed about the lack of clarity on the scope of the guidelines.

Discussion

Section 1: Preamble/Introduction

Paragraph 3

39. It was agreed to add “Regulatory frameworks” at the beginning of the sentence and to simplify the end of the sentence by deleting “safety, authenticity, integrity, suitability and quality of food”.

Paragraph 6bis

40. Different views were expressed on the usefulness of this paragraph, especially since the term “anti-food fraud culture” was not a defined term and therefore could cause confusion. There was also some potential overlap with paragraph 5. Those in support of applying the term explained that the main focus of an “anti-food fraud culture” was to cause change in human behaviour, for example through awareness raising.

⁶ CX/FICS 24/27/5; CX/FICS 24/27/5 Add.1; CRD8 (Ghana, Nigeria, Republic of Korea, Thailand and East African Community), CRD15 (Brazil); CRD16 (Egypt); CRD17 (African Union); CRD18 (Panama); CRD19 (India); CRD20 (Burundi); CRD21 (Indonesia); CRD22 (Senegal); CRD23 (Malaysia)

41. Following a constructive discussion on whether or not to include the term “anti-food fraud culture”, it was agreed to delete it from the paragraph. The paragraph was edited to emphasize the importance of preventative measures and collaboration of the stakeholders.

Section 2: Purpose/Scope

Paragraph 7

42. There was discussion on whether to include reference to feed for food producing animals in the scope. It was agreed to delete “may impact human food safety” and end the first sentence with “including, as appropriate, feed for food producing animals”. It was proposed that the EWG give further consideration to how feed for food producing animals was reflected and referenced throughout the guideline.
43. CCFICS27 considered footnote 3 that referred to the exclusion of intellectual property (IP) issues, specifically geographical indications (GIs)..
44. Following a constructive discussion, and in the spirit of compromise CCFICS27 agreed to: i) delete footnote 3; ii) add at the end of paragraph 3 the phrase “Issues related to intellectual property are not included in this document”; and iii) exclude mentioning GIs as they are a type of IP.
45. The European Union (EU) acknowledged that a compromise had been reached that excluded issues related to IP from the scope of this guideline, and noted that IP issues, including GI, may be considered as food fraud by national authorities and were subject to applicable national legislation.

Paragraph 7bis

46. CCFICS27 agreed that as the investigation and prosecution of food fraud offenses were outside the scope of this guideline, paragraph 7bis was unnecessary and was deleted.

Section 3: Definitions

47. Responding to a question, the EWG chair clarified that there was no intended difference between the terms ‘food’ and ‘food products’ and that it was better to refer to ‘food’ only throughout the guideline.

Food fraud

48. Following a discussion on whether to refer to prescribed specifications or not, and what “expected” characteristics meant, it was agreed to keep this definition in square brackets and revisit it at a later stage.

Food integrity and Food authenticity

49. There were divergent views on whether to keep these definitions or not. It was argued that they should be deleted as they were not used in the draft guideline and since these concepts were broader than food fraud. It was also argued to keep them since these concerns were relevant to food fraud.
50. It was agreed to keep these two definitions in square brackets and revisit them at a later stage.

Section 4: Types of food fraud

51. It was clarified that the descriptions had to be read in conjunction with the chapeau that was referring to intentional act for economic gain.
52. Substitution: This description was reworded to “Replacing a food or a food ingredient, in whole or in part, with another ingredient, in whole or in part (most often of lower value) without declaring it”. The bracket was included to indicate that usually the substitution was of lower value than the original food/food ingredient, but not always.

Section 5: Principles

53. To avoid repetition and ensure clarity around the principles CCFICS27 simplify simplified the section by rewording the chapeau and making each principle a single sentence without a narrative.
54. The section was reworded to read as follows:

“Competent authorities and FBOs should be guided by the following principles to prevent, detect, mitigate, and control food fraud:

Principle 1: The occurrence of food fraud can be reduced by having measures in place, proportionate to the level of risk.

Principle 2: Cooperation among competent authorities, within or between countries, as well as with FBOs, can help reduce food fraud.”

Section 6: Roles and responsibilities*Paragraph 9*

55. Due to overlapping content, CCFICS27 agreed to merge points c. and d. to read:

“Communicate, coordinate and collaborate with other competent authorities within and between countries, industry, academia and stakeholders as needed”.

Paragraph 10

56. CCFICS27 supported a proposal by a Member for this paragraph to become a separate section addressing FBOs, and this should be addressed by the EWG.
57. Following a constructive discussion, CCFICS27 agreed to retain subparagraph b.bis in square brackets for further consideration due to its potential overlap with subparagraph e.

Sections 7 and 8:

58. A Member proposed to merge Sections 7 and 8 with the part of Section 6 (paragraph 9) that addressed competent authorities, so that the new section only dealt with relevant roles, responsibilities and activities of competent authorities. CCFICS27 supported this proposal for reshuffling of the text, and this should be addressed by the EWG.

Conclusion

59. Considering that CCFICS27 had made significant progress in building consensus on sections 1, 2, 4, and 5 and resolved the substantial issues, CCFICS27 agreed to:
- Forward the draft guidelines on the prevention and control of food fraud to CAC47 for adoption at Step 5 (Appendix II);
 - Establish an EWG, open to all Members and Observers, chaired by the United States, and co-chaired by China, EU, Iran, Panama, and UK, working in English and Spanish, with the following terms of reference:
 - i. To consider comments received at Step 6, and all outstanding issues, including comments made at CCFICS27 on sections 3, 6, 7 and 8.
 - ii. To consider whether the reference to feed for food producing animals in the purpose/scope was consistent with the extent to which the draft guideline addresses feed for food producing animals.
 - iii. To undertake multiple rounds of comments as necessary.
 - iv. To submit the report of the EWG at least three months before CCFICS28.
 - To keep open the possibility to hold virtual intersessional meetings, to address any outstanding issues, and if needed, a physical working group immediately prior to CCFICS28.

DRAFT REVISION AND UPDATING OF THE *PRINCIPLES FOR TRACEABILITY/PRODUCT TRACING AS A TOOL WITHIN A FOOD INSPECTION AND CERTIFICATION SYSTEM (CXG 60-2006) (Agenda item 6)*⁷

60. The United States of America as Chair of the EWG introduced the item. The CCFICS Chairperson opened the discussion on this item, inviting first general comments on the document.
61. The following general comments were noted:
- There was general support for the work done by the EWG to update CXG60-2006.
 - The title should refer to principles and guidelines.
 - Traceability/Product tracing was one of a number of tools that can be utilized by Competent Authorities (CAs) within their NFCSs.
 - The original text relating to the Context (paras 4 – 6) and Rationale (paras 7 – 10) for traceability / product tracing should be reflected in the guidelines.

⁷ CX/FICS 24/27/6; CX/FICS 24/27/6 Add.1; CRD9 (Australia, Ghana, Mexico, Morocco, Nigeria, Republic of Korea, and East African Community); CRD17 (African Union); CRD18 (Panama); CRD20 (Burundi); CRD21 (Indonesia); CRD23 (Malaysia)

- Traceability/Product Tracing when used as a tool within an NFCS, did not by itself identify food safety risks nor fraudulent/deceptive practices, nor provide confidence in the safety and suitability of imported food. The text should therefore be redrafted to avoid overstating what Traceability/Product Tracing can achieve.
 - The term “Risk” was used throughout the text, but it was not clear if, when and how it should be considered or should be taken into account when establishing the requirements for Traceability/Product Tracing that go beyond the specified minimum of one step forward/one step back.
 - The use of digital systems and/or technology for Traceability/Product Tracing should be optional to provide flexibility to CAs and FBOs. Interoperability between digital systems, and between digital and manual systems, should be considered.
 - The guidelines should allow flexible implementation of traceability/product tracing. In this regard, sections such as “Responsibility”; “Legal requirements” etc. should be further considered.
 - The guidelines should not legitimise the transboundary regulation from one country to another, as suggested in paragraph 18 and 19.
 - The revised guidance should capture all important concepts in CXG 60-2006.
62. CCFICS27 further considered the draft document section by section; agreed number each section, and made the following decisions:
- 1: PREAMBLE**
63. CCFICS27 considered the preamble paragraph by paragraph, as follows:
- Paragraph 1*
64. The statement in square brackets was deleted as it could be construed to be an alternative definition to the existing Codex definition for traceability. The remaining text was aligned to reflect the dual mandate of Codex i.e. “protecting the health of consumers” and “ensuring fair practices in the food trade”.
- Paragraph 2*
65. This paragraph was transferred from the Preamble to the Scope, and reworded as indicated in paragraph 69 below.
- Paragraph 3 and 4*
66. These paragraphs were simplified to ensure that the concepts stated therein were clear and the language was not instructive.
- Paragraph 5 and 6*
67. These were deleted from the preamble since they duplicated the information on the role of Traceability/Product Tracing towards food safety and fair practices in food trade, which was already covered in the preceding paragraphs.
68. Due to time constraint paragraphs 7 and 7bis were not discussed.
- 2: PURPOSE/SCOPE**
69. The section was revised as follows:
- The title of the section was amended to include the word “purpose” to ensure that the section embraced broad concepts and provided the desired flexibility for including other aspects.
 - The section was redrafted to clarify that the guidelines do not prescribe specific ways to conduct traceability/product tracing.
- 3 DEFINITIONS**
70. CCFICS27 noted a proposal to transfer the definitions in Annex I to this section, and to further consider which definitions were necessary.
- 4 PRINCIPLES**
71. CCFICS27 agreed to include an edited version of paragraph 8 of CXG60-2006. The new paragraph reflected that traceability/product tracing is a tool that may be used by competent authorities within its NFCS, and when combined with appropriate measures can contribute to product safety outcomes or contribute to the protection of consumers against deceptive practices.

71. CCFICS27 agreed that the concept of “one step back” and “one step forward” in paragraph 13 under the section for legal requirements was a principle and should be moved to this section.
72. At this point the CCFICS Chairperson concluded the paragraph-by-paragraph consideration of the guideline.
73. To make use of the limited time available, the CCFICS Chairperson concluded the paragraph-by-paragraph consideration of the guideline and invited CCFICS27 to provide general comments on the remaining sections (Responsibilities, Legal Requirements, Good Practice).
74. CCFICS27 provided the following additional comments that would assist in the further development of the guideline:

Nature of guidelines

- a) The guidelines should be general in nature to ensure greater flexibility in implementation.

Legal aspects

- b) The language in the Section on legal requirements should recognise the existence of national legislative frameworks or structures.

Use of Technology

- c) The guidelines should be technology neutral and allow for both paper-based systems and electronic systems. The diverse capabilities between countries should be taken into account.

Principles

- d) The principles should have a single detailed statement or description that is factual, and is consistent with current Codex language. Further the definitions should not be repeated in the principles.

75. While recognising the significant interest and engagement in the revision of CXG 60-2006, the CCFICS Chairperson concluded that the guideline was not ready to advance in the Step process.

Conclusion

76. CCFICS27 agreed:
- i. To return the draft principles and guidelines on traceability/product tracing as a tool within a NFCS to Step 2 for redrafting, using the edited text from CCFICS27 as a basis, and for circulation at Step 3 for comments.
 - ii. To establish an EWG, open to all Members and Observers, chaired by the United States and co-chaired by Australia, Ecuador, Honduras, and the United Kingdom, working in English and Spanish, with the following terms of reference:
 - a. To continue the revision of the guidelines, taking into account the discussions and comments made during CCFICS27.
 - b. To keep open the option to hold an intersessional hybrid or virtual working group meeting, to address any outstanding issues.
 - c. To submit the report of the EWG at least three months in advance of CCFICS28.

DISCUSSION PAPER ON GUIDANCE ON APPEALS MECHANISM IN THE CONTEXT OF REJECTION OF IMPORTED FOOD (Agenda item 7)⁸

77. India introduced the item proposing new work on developing guidance on appeals mechanism in the context of rejection of imported food highlighting the need for a uniform appeal mechanism to ensure fair practices in food trade.

Discussion

78. CCFICS27 noted a general support for this new work proposal with the following comments:
- The work should not be a stand alone document but rather an annex to either the *Guidelines for the Exchange of Information between Countries on Rejections of Imported Foods* (CXG 25-1997) or *Guidelines for Food Import Control Systems* (CXG 47-2003).
 - There are many appeals related to laboratory and sampling protocols and these may need to be taken into account.

⁸ CX/FICS 24/27/7; CRD10 (Ghana, Kenya, Madagascar, Morocco, Nigeria, Republic of Korea, United Republic of Tanzania, and East African Community); CRD17 (African Union); CRD18 (Panama); CRD20 (Burundi)

- The work should also focus on preventive actions and mechanisms for dealing with information from Competent Authorities.
 - The work should be in the form of guidelines rather than requirements to avoid conflict with existing national regulations.
79. It was agreed that the work would be an amendment and/or an annex to the existing *Guidelines for the Exchange of Information between Countries on Rejections of Imported Foods* (CXG 25-1997) or the *Guidelines for Food Import Control Systems* (CXG 47-2003)
80. Based on the discussion, the scope of the new work proposal was amended to include the exporting country as one of the stakeholders that may file an appeal against the rejection.
81. It was proposed that the new work not only address an appeals mechanism, but also the review option mentioned in CXG 47-2003.
82. A Member suggested concentrating on prevention of rejection rather than the process after rejection.

Conclusion

83. CCFICS27 agreed:
- to forward the new work proposal on developing guidance on appeals mechanism in the context of rejection of imported food to CAC47 for approval (Appendix III);
 - to establish an EWG, working in English, chaired by India and co-chaired by Nigeria, Australia, Chile, and Kenya, subject to approval of new work by CAC, with the following terms of reference:
 - to prepare draft guidance on appeals mechanism in the context of rejection of imported food, for consideration by CCFICS28;
 - submit the report of the EWG at least three months prior to CCFICS28.
 - to keep open the option to hold virtual meetings of the EWG and/or a PWG meeting immediately prior to the next CCFICS session.

DISCUSSION PAPER ON THE STANDARDIZATION OF SANITARY REQUIREMENTS (Agenda item 8)⁹

84. Brazil introduced the new work proposal, which was based on the identification of issues with electronic certification, including non-unique requirements, repetitive information, and lack of consistency and transparency in communication. The proposed new work would define criteria and methods to evaluate existing attestations and enable the creation of a harmonized requirement list. The proposal aimed to develop guidance to continue with the simplification and the use of electronic certification. This would in turn expedite clearance processes, thus contributing to improved food safety. The guidance would maintain the flexibility for countries to define specific requirements.
85. This new work would require cooperation within CCFICS and with other international organisations.

Discussion

86. Members expressed support for this new work proposal noting that it would help countries transition to the use of electronic certificates, which can simplify clearance processes and thereby promote food safety which can simplify clearance processes.
87. CCFICS27 amended the title to read "Guidance on the standardization of the representation of sanitary requirements" to better reflect the content of the new work proposal.

Conclusion

88. CCFICS27 agreed:
- to forward the new work proposal on developing guidance on the standardisation of sanitary requirements to CAC47 for approval as new work (Appendix IV);
 - to establish an EWG working in English, chaired by Brazil and co-chaired by Australia, EU, India, Kenya, Spain, and Uganda, subject to approval of new work by CAC, to prepare draft guidance on the standardisation of sanitary requirements, for consideration by CCFICS28;
 - that the report of the EWG should be submitted at least three months prior to CCFICS28; and

⁹ CX/FICS 24/27/8; CRD11 (European Union, Ghana, Kenya, Nigeria, Rwanda, United Republic of Tanzania, and East African Community); CRD13 (Brazil); CRD17 (African Union); CRD18 (Panama); CRD20 (Burundi)

- to keep open the option to hold virtual meetings of the EWG between CCFICS27 and CCFICS28 and if required, a physical working group meeting immediately prior to CCFICS28.

REVIEW AND UPDATE OF APPENDIX A - THE LIST OF EMERGING GLOBAL ISSUES (Agenda item 9)¹⁰

89. The United Kingdom introduced the item highlighting that emerging global issues continued to be important for CCFICS to consider, particularly in relation to new approaches and technologies concerning NFCSs.
90. It was noted that the responses to CL 2023/66-FICS confirmed the importance of the issues identified in Appendix A (List of new emerging global issues), which had been updated to take into account the developments.
91. Three new emerging issues had been identified: 1) increased use of establishment listings to support trade; 2) a trend towards digitalisation of NFCSs; and 3) increased use of artificial intelligence (AI) to support NFCSs.
92. Following responses to the CL and the virtual intersessional workshop held in May 2024 which explored the existing list of emerging global issues and the three newly identified emerging issues two new work proposals were developed for consideration by CCFICS27 (CX/FICS 24/27/9 Add.1 and CX/FICS 24/27/9 Add.2).

Conclusion

93. CCFICS27 agreed:
- to the list of emerging issues as identified in Appendix A of CX/FICS 24/27/9;
 - that the list of emerging issues continues to be a standing agenda Item for future CCFICS sessions, and that the custodianship should continue to be rotated among Members on a meeting-by-meeting basis;
 - to request the Codex Secretariat to issue a CL requesting inputs from Members and Observers on emerging global issues to be included in Appendix A to be developed for CCFICS28;
 - that EU with the support of Australia be the next custodian of Appendix A to be prepared for CCFICS28;
 - to hold a virtual intersessional workshop prior to CCFICS28 to discuss the emerging issues under Appendix A;

Discussion paper and new work proposal on establishment listings

94. Norway introduced the discussion paper and new work proposal, as contained in CX/FICS 24/27/9 Add, 1, on revising the *Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food* (CXG 89-2016) to develop principles and guidelines to harmonize the use (the drivers), development (content and format) and implementation (mechanisms including digitalization) of establishment listings, which could be annexed to CXG 89-2016.

Discussion

95. Members expressed support for the new work proposal as they considered that it addressed a need for NFCSs and that the work was timely. They supported the work to be an annex to CXG 89-2016 as this would avoid opening up the existing guidelines for a more extensive review. It was also proposed that aspects such as prelisting, list of products and establishments, and necessity of lists could be taken into account.
96. Norway proposed that, should the new work proposal be approved, an intersessional PWG could be hosted by Norway.

Conclusion

97. CCFICS27 agreed:
- to forward to CAC47 for approval, the proposal for new work on revising the *Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food* (CXG 89-2016) to develop principles and guidelines to harmonize the use, development and implementation of establishment listings (Appendix V);
 - to establish an EWG, working in English, chaired by Norway and co-chaired by Australia, India, Morocco, Saudi Arabia and Spain, subject to approval of the new work by CAC47, to prepare the draft revision to CXG 89-2016, to include principles and guidelines to harmonize the use, development

¹⁰ CX/FICS 24/27/9; CX/FICS 24/27/9 Add.1; CX/FICS 24/27/9 Add.2; FICS/27 INF/02; CRD12 (European Union, Ghana, Kenya, Nigeria, United Republic of Tanzania, and East African Community); CRD18 (Panama); CRD20 (Burundi)

and implementation of establishment listing, for consideration by CCFICS28;

- that the report of the EWG should be submitted at least three months prior to CCFICS28; and
- keep open the possibility of convening virtual meetings and/or a PWG.

Discussion paper and new work proposals on digitalisation of national food control systems

98. Australia introduced the discussion paper and the new work proposal on digitalisation of NFCSSs, as contained in CX/FICS 24/27/9 Add.2, explaining that the work was aimed at developing high-level flexible guiding principles by capturing relevant universal themes providing an overarching framework, identifying existing digital-related international standards and guidance, and establishing relevant digital-related definitions.

Discussion

99. Members expressed support for the new work proposal as it was timely and addressed both current and future needs of NFCSSs.

Conclusion

100. CCFICS27 agreed:
- to forward the project document on the development of high-level guiding principles for the digitalisation of NFCSSs to CAC47 for approval as new work (Appendix VI).
 - to establish an EWG working in English, chaired by Australia and co-chaired by Canada, Jamaica, the Netherlands, and the UK, subject to approval of new work by CAC, to prepare draft principles for the digitalisation of NFCSSs for consideration by CCFICS28.
 - that the report of the EWG should be submitted at least three months prior to CCFICS28.
 - to keep open the option to hold virtual meetings between CCFICS27 and CCFICS28 and a PWG meeting immediately prior to CCFICS28.

OTHER BUSINESS (Agenda item 10)¹¹

Proposed amendment to the *Principles and Guidelines on the Use of Remote Audit and Inspection in Regulatory Frameworks (CXG 102-2023)*

101. CCFICS27 recalled that during the adoption of the Agenda (Under Agenda item 1), it was agreed that the proposed amendment to the *Principles and Guidelines on the Use of Remote Audit and Inspection in Regulatory Frameworks (CXG 102-2023)*, submitted by Norway (in CRD05) would be discussed under this item, time permitting.
102. Due to the time constraints, CCFICS27 could not discuss this issue thoroughly but, noted a comment by a member that the proposed amendment was not purely an editorial issue.
103. The Chairperson of CCFICS committed to work with Norway to consider how best to address their concerns and proposed amendments.

DATE AND PLACE OF THE NEXT SESSION (Agenda item 11)

104. The Committee was informed that the 28th Session of CCFICS would be held in October 2026, subject to confirmation by Australia in consultation with the Codex Secretariat. The possibility of adding an extra day for plenary discussions would be considered.

¹¹ CRD5 (Norway); CRD18 (Panama)