

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda item 11

CX/FICS 26/28/11 Appendix
ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx ALIMENTARIUS COMMISSION

CODEx COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-eighth Session

Perth, Australia

12 - 17 October 2026

Review and update of Appendix A - List of emerging global issues

(Comments in reply to CL 2024/85-FICS)

Submitted by:

Australia, Chile, Colombia, Egypt, The Gambia, Iran, Iraq, New Zealand, Peru, Phillipines, Uganda, United Kingdom, Uruguay and European Network of Childbirth Associations (ENCA), International Baby Food Action Network (IBFAN), International Commission for Uniform Methods of Sugar Analysis (ICUMSA), Institute of Food Technologists (IFT)

Background

This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/85-FICS issued in December 2024.

Under the OCS, comments are compiled in the following order; general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

The comments submitted through the OCS are herewith annexed and presented in tabulated format.

ANNEX

GENERAL COMMENTS

COMMENT	MEMBER / OBSERVER
<u>New Potential Emerging Global Issue for consideration:</u> As technology develops, national food control systems are evolving rapidly and changes proliferating. These innovations present an increasing challenge to international harmonisation if they are not implemented in a risk-based and outcomes-based way. CCFICS should consider how it can strengthen support for risk and outcomes-based national food control systems so that innovation can be embraced without introducing unnecessary barriers to international food trade. Related impact on CCFICS/Codex: Under the CCFICS terms of reference, the committee is to “develop principles and guidelines for food import and export inspection and certification systems with a view to harmonising methods and procedures which protect the health of consumers, ensure fair trading practices and facilitate international trade in foodstuffs”. Emerging trends indicate that, as national food control systems continue to evolve and adapt to technology development, new requirements are proliferating. There is a risk this will undermine the objective of international harmonisation if new requirements are implemented in a way that is prescriptive instead of outcomes based. CCFICS should explore the root cause, including examining whether this is an issue with: a) existing CCFICS guidance needing to be updated b) insufficient practical guidance/tools for how to implement CCFICS texts c) lack of awareness of CCFICS standards d) or a combination of these and/or other reasons. <u>Regarding potential issue a)</u> there are examples of where CCFICS is already updating existing texts to provide more detailed guidance on risk-based design and implementation of control measures. For example, the Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food CXG 89-2016) is being updated with the aim of harmonising the use (the drivers), development (content and format) and implementation (mechanisms including digitalization) of establishment listings to promote a risk basis to their function. With growing options for countries to use digital tools and platforms and request large amounts of data, there is increasing risk that divergent approaches could introduce barriers to trade if not implemented in a risk and outcomes-based way. In this respect, there may be a need to further revisit overarching CCFICS texts, for example, CXG 82-2013 Principles and Guidelines for National Food Control Systems to ensure they can effectively support harmonisation in a changing regulatory and technological environment. <u>Regarding potential issue b)</u> similar issues have been raised in other Codex Committees, and different views have been expressed as to whether such materials are best developed within Codex or through another mechanism. Are there ancillary texts/tools that could be developed within CCFICS, such as guidance for the practical application of CCFICS texts? Are there other materials such as toolkits that could be developed in collaboration with multilateral institutions? Some such tools already exist (e.g. the FAO/WHO Food control system assessment tool; UNIDO Voluntary Third-Party Assurance Programme Assessment Tool.pdf). Could these be revisited through the lens of this issue? Related CCFICS text: The issue being presented is broad. Work would need to be done to further define the issue and relevant CCFICS texts. Reason for priority: Rated high priority with estimated high impact on food safety and trade. Poor international harmonisation toward risk and outcomes-based approaches creates barriers to trade and	Australia

COMMENT	MEMBER / OBSERVER
leads to duplication of regulatory effort and/or redirection of resources from areas of highest food safety impact. Given ongoing work to develop principles for the digitalisation of NFCS in CCFICS, it would be timely to address the issue of risk-based national food control systems in parallel.	
Chile apoya los tres temas incipientes” propuestos priorizados en la 27ª reunión del CCFICS, las cuales dan cuenta de las tendencias internacionales relevantes a ser abordados en el marco del mandato de este Comité. Adicionalmente, en relación a incorporar “detalles adicionales sobre las propuestas que figuran actualmente en el Apéndice A de la carta circular, Chile se permite realizar observaciones a los temas N°2 y N°3, en cuanto a “Repercusiones relativas al CCFICS/Codex”. El propósito de estas modificaciones es incorporar precisamente dentro de estas tendencias incipientes aspectos que ya están generando atención en las operaciones rutinarias del sector público. Tema Original N°2 Uso y aplicación emergentes de herramientas digitales y analíticas, por ejemplo, seguimiento continuo/en tiempo real. Nuevos enfoques de gestión de la inocuidad alimentaria, incluidos los enfoques preventivos y basados en los resultados. Interoperabilidad a través del uso creciente de la digitalización y la inteligencia artificial (IA) en los programas de modernización de la normativa para orientar mejor recursos finitos. Otras consecuencias incluyen cambios en la forma en que algunas autoridades ejercen sus facultades normativas, capacitan al personal, llevan a cabo actividades de verificación del cumplimiento (por ejemplo, centradas en la cultura de la inocuidad alimentaria) y supervisan el rendimiento de su sistema de control de los alimentos para identificar y gestionar los riesgos de manera proactiva. Propuesta (Va en comillas, la gestión de las certificaciones en línea y supervisan el rendimiento de su sistema de control de los alimentos para identificar y gestionar los riesgos de manera proactiva.) Uso y aplicación emergentes de herramientas digitales y analíticas, por ejemplo, seguimiento continuo/en tiempo real. Nuevos enfoques de gestión de la inocuidad alimentaria, incluidos los enfoques preventivos y basados en los resultados. Interoperabilidad a través del uso creciente de la digitalización y la inteligencia artificial (IA) en los programas de modernización de la normativa para orientar mejor recursos finitos. Otras consecuencias incluyen cambios en la forma en que algunas autoridades ejercen sus facultades normativas, capacitan al personal, llevan a cabo actividades de verificación del cumplimiento (por ejemplo, centradas en la cultura de la inocuidad alimentaria), "la gestión de las certificaciones en línea y supervisan el rendimiento de su sistema de control de los alimentos para identificar y gestionar los riesgos de manera proactiva."	Chile
Colombia está de acuerdo en que la repercusión en la inocuidad alimentaria y el comercio para trabajar este tema en el CCFICS sea media a alta y respalda la priorización de estudio de esta propuesta de nuevo tema de trabajo. Este tema corresponde al número 3 de la lista resultante del taller realizado el 21 de mayo de 2024 Las nuevas tecnologías y las herramientas emergentes mejoran la eficiencia y seguridad de los resultados, al igual que promueven la sostenibilidad, la transparencia y la equidad. Sin embargo, su implementación requiere inversión, capacitación y una gobernanza clara que garantice su uso responsable.	Colombia
Egypt would like to express its appreciation to the EWG for the significant efforts reflected in the document, particularly in identifying and outlining emerging global trends relevant to the work of CCFICS. We have reviewed Appendix A and would like to confirm our agreement with the approach and the proposals included therein. Egypt highly values the work undertaken, which provides a useful and comprehensive basis for reflecting on potential future areas of work for the Committee. At this stage, Egypt has no additional comments or proposed amendments and looks forward to continued discussions on this important topic.	Egypt

COMMENT	MEMBER / OBSERVER
The recent large-scale recalls of commercial formula (including infant formula) products contaminated with difficult to remove spore-forming and toxin producing bacteria – <i>Clostridium botulinum</i> and <i>Bacillus cereus</i> has eroded parents' trust in commercial food systems. The systemic failures in formula production, regulatory surveillance, recall systems and crisis communication have highlighted the urgent need for consistent, regular, independent and transparent regulatory oversight of manufacturing facilities. Recalls in over 60 countries demonstrate the high-risk nature of commercial formulas that can lead to serious illness and possibly death in a vulnerable population. There is a need to transform national food safety surveillance and verification regulations to ensure that they are independent, transparent and free from commercial interference. Border control capacity must be increased and strengthened to manage imports of these high-risk products that are subject to frequent recalls. The lack of regulation of cross-border digital marketing and sale of products for infants and young children, adds to the food safety risks to child health. Parents are pressured into buying potentially contaminated products with idealised, misleading claims that products are manufactured with an 'abundance of caution.' Parents place their trust in manufacturers and when children fall sick, are left with denial, robotic answerphone messages, limited treatment and no access to information or support. During the EB debate on Maternal and Young Child Nutrition about 50 governments and NGOs called for more protection of breastfeeding, highlighted conflicts of interest and stressed the need to bring the International Code and Resolution 78.18 on digital marketing into legislation. Complex Food chain: The food chain is increasingly complex and globalized with novel processes that the public has no hope of understanding. While food businesses are responsible and must be held accountable for the microbiological safety and quality of both the ingredients and the final product. They should also have verification procedures in place to audit and select ingredient suppliers. However, it is inevitable that there will be negligence and human error within manufacturing facilities that result in health risks. Transparency regarding this is essential. Regulatory bodies must not shirk their responsibilities to monitor, regularly inspect and audit businesses. There has been a shockingly poor and unequal response from health authorities regarding the recent contamination crisis, with no transparency or explanations about what really happened or how the crises were managed. From a consumer perspective, the dual mandate of Codex – both to protect and consumer health and to facilitate fair trade –compromises the credibility of Codex when it comes to acknowledging and dealing with the safety and quality of highly processed products. The minimal warnings and marketing safeguards in Codex standards have boosted the global trade of addictive, plastic-wrapped products to such an extent that it will be a major challenge for Codex to properly acknowledge their risks – the health risks alongside the fossil-fuel-intensive agriculture, mono-cropping, deforestation and land-grabbing – and follow a One Health approach. Nevertheless, from a human rights and planetary health perspective, this is essential and we strongly advocate that local food producers (none more local than breastfeeding mothers) and traditional cultures are prioritised. The task of import and export operators to ensure that products are safe will be impossible unless these issues are frankly and honestly addressed and there is prior oversight by independent authorities of food safety systems. The system must not be left in the hands of financially interested parties. Last but not least, whistleblowers must be listened to.	ENCA
It may be the case that existing CCFICS texts touch on, but do not fully address, an identified global issue. In this case, additional or clarifying guidance may be warranted. This may present an opportunity for CCFICS to consider the appropriateness and priority of potential new work, using the framework that was presented in Appendix B of CX/FICS 23/26/9 and agreed by CCFICS26. It may also present an opportunity to review existing text in light of new data, or new trading environments.	Gambia

COMMENT	MEMBER / OBSERVER
An identified global issue for instance,.....	
The recent large-scale recall of infant formula products contaminated with difficult to remove spore-forming and toxin producing bacteria – Clostridium botulinum and Bacillus cereus highlights the need for improved independent and transparent regulatory oversight of the producing manufacturing facilities. Recalls in over 60 countries demonstrate the high-risk nature of infant formula products that can lead to serious illness and possibly death in a vulnerable population. Addressing food safety regulations, accountability and transparency is needed to reduce the risks associated with contaminated infant formula products. Inspection reports and oversight reports of manufacturing practices are essential and must be mandatory requirements to protect public health needs and to strengthen border control capacity to manage imports of these high-risk products that are subject to frequent recalls. IBFAN agrees with the proposals for new work taking into account the special oversight requirements for infant formula products intended for infants and young children.	IBFAN
The document is a good start and likely will receive comments to enable it to be improved.	ICUMSA
The Institute of Food Technologists (IFT) welcomes the opportunity to comment on emerging global issues related to Food Import & Export Inspection & Certification Systems to enhance food safety and global trade. Upon reviewing Appendix A, IFT would highlight Issues #1 and #2 as areas of focus. IFT has extensive experience with Food Traceability systems through the IFT Global Food Traceability Center (GFTC) that has been supporting development of food traceability research (https://www.fda.gov/files/food/published/PilotProjectsforImprovingProductTracing.pdf), guidance (https://ift.onlinelibrary.wiley.com/doi/10.1111/j.1541-4337.2009.00097x), and tools for both industry and regulatory agencies. While the current CCFICS work via EWG on updating the Principles and Guidelines on Food Traceability are proceeding, there are many new efforts regarding Food Traceability that likely would be new work for CCFICS. Specifically, under Issue #1, several emerging approaches warrant consideration with respect to food traceability data handling, system interoperability, harmonization across food commodities, and alignment between industry and member country regulatory agencies. Under Issue #2, advancements in artificial intelligence (AI) have implications across multiple aspects of food systems, including traceability. <u>Concluding Summary</u> IFT believes that these two issues are of major importance for CCFICS to consider as New Work at the upcoming CCFICS28 meeting in October 2026. IFT is open to providing support to CCFICS on these two issues if either or both are selected as New Work priorities by the committee.	IFT
1. For clarity and consistency, it may be helpful to further harmonize the terminology used across Appendix A, particularly in relation to references to “digital tools,” “new technologies,” and “regulatory modernization,” to avoid potential overlap or ambiguity among listed issues. 2. The inclusion of brief definitions or explanatory notes for broad concepts (e.g. artificial intelligence, interoperability, food safety culture) could improve common understanding among Members and Observers when considering future work proposals. 3. Iran suggests that Appendix A explicitly reflects the cross-cutting implications of emerging global issues on developing and transition economies, particularly in relation to capacity building, infrastructure limitations, and resource constraints affecting national food control systems. It is also proposed to add the dimension of “Coordination in response to cross-border food safety emergencies” to the “Inter-Governmental Agency Interaction” section. Incidents such as food outbreaks or natural disasters require rapid cooperation between food authorities, customs and disaster management organizations, and CCFICS can play a role in developing common protocols.	Iran
There are no suggestions to add to the list.	Iraq

COMMENT	MEMBER / OBSERVER
New Zealand appreciates the opportunity to comment. We are suggesting that the work currently underway by CCFICS should be added against the issues. We do not have any suggestions for further new work New Zealand suggest that CCFICS needs to focus on progressing our current work items.	New Zealand
POTENTIAL ADDITIONAL EMERGING ISSUE Antimicrobial and Pesticide Resistance, biosecurity and emerging pandemics RELATED INMPACT ON CCFICS Increased pressure on National Food Control Systems to assure compliance with residue limits and importing country requirements. Implications for risk-based inspection, sampling, testing, verification and certification of foods of animal and plant origin. Challenges to equivalence and systems recognition due to differing national controls. Need for enhanced coordination among competent authorities. Increased reliance on laboratory data and monitoring systems to support official assurances in export certification. RELATED CCFICS TEXT • CXG 19-1995 • CXG 34-1999 • CXG 47-2003 • CXG 82-2013 • CXG 91-2017 JUSTIFICATION: Growing global concern over antimicrobial and pesticide resistance, combined with stricter import controls and residue requirements, necessitates strengthened and harmonized CCFICS guidance to support credible inspection and certification systems, particularly for exporting developing countries	Uganda
In response to CL2024-85-FICS regarding the proposed emerging global issues listed in Appendix A, United Arab Emirates fully supports the three proposals as well as the prioritization tool agreed upon during CCFICS27. Proposal 1: New and evolving food production, processing, transport and distributing systems and technologies. United Arab Emirates supports the prioritization of new work within CCFICS addressing emerging and evolving food production, processing, transport, and distribution systems and technologies. UAE considers this initiative timely, strategic, and aligned with the transformation of global food systems, and therefore believes that it falls within the mandate of CCFICS to facilitate safe, transparent, and fair international food trade. UAE is of the view that Codex guidance through the existing texts (CXG 47-2003, CXG 53-2003, CXG 82-2023,...) is essential to ensure that inspection and certification systems remain fit-for-purpose, risk-based, interoperable, and responsive to technological innovation.	United Arab Emirates

COMMENT	MEMBER / OBSERVER
Emerging global issues for consideration <u>General comment:</u> The UK welcomes the opportunity to comment on Appendix A. Overall, the list aligns with several trends identified in a recent UK FSA strategic and regulatory horizon-scanning exercise (to be published Summer 2026). Informed by this work, the UK suggests adding explicit reference to supply-chain fragility, cybersecurity and developments linked to wider food-system sustainability objectives. These trends are being driven by a combination of factors, including increased geopolitical risk, regulatory and border-modernisation initiatives, and efforts to transition the food system towards a more sustainable model. The UK further suggests explicitly recognising the potential for regulatory-assurance gaps associated with digitalisation and the growing use of algorithmic and AI-supported decision-making, as these developments may influence transparency and trust in National Food Control Systems (NFCS).	United Kingdom
Pertinencia para el Sistema Nacional de Control de los Alimentos de Uruguay Uruguay considera que los temas incipientes identificados por el CCFICS son pertinentes y relevantes para su Sistema Nacional de Control de los Alimentos, particularmente en el contexto de un país exportador que basa su acceso a mercados en la equivalencia de sus sistemas y la eficacia de los controles oficiales. La incorporación de nuevas tecnologías y sistemas de producción, así como el uso creciente de herramientas digitales y enfoques basados en riesgo, plantea desafíos y oportunidades para la evaluación de la equivalencia, la definición de atestaciones y la coordinación entre autoridades competentes. En este sentido, Uruguay considera que el análisis de estos temas contribuiría a fortalecer la aplicabilidad y vigencia de los textos del Codex, en línea con el mandato del CCFICS y las necesidades actuales de los sistemas nacionales de control de los alimentos.	Uruguay

Issue no 1 - New and evolving food production, processing, transport and distributing systems and technologies.	
Issue no 1. Colombia está de acuerdo en que la repercusión en la inocuidad alimentaria y el comercio para trabajar este tema en el CCFICS sea media y que para abordarlo es posible que se deban actualizar textos actuales del Codex. Este tema corresponde al número 2 de la lista resultante del taller realizado el 21 de mayo de 2024. Las nuevas tecnologías y sistemas de producción de alimentos es necesario considerarlas no sólo en el Codex sino en la elaboración de nuevas normativas sanitarias o su actualización por parte de los países miembros.	Colombia
Issue no 1. Uganda supports the proposal and rates it as priority No. 2	Uganda
Issue no 1. Novel foods: The emergence of alternative proteins, cell culture products and microalgae pose challenges for defining safety criteria, traceability and assessing the equivalence of national systems. The lack of a globally harmonized framework could lead to trade disputes; therefore, it is suggested that CCFICS work proactively on this issue.	Iran
Issue no 1. The UK suggests expanding the scope to explicitly reference precision fermentation, cell-cultured production, AI-enabled process control, and hybrid supply chains that combine traditional and novel methods, given their potential implications for NFCS oversight and assurance.	United Kingdom
Issue no 1. Traceability Foundational Data Standards & Responsibilities Emerging trends point toward greater need for clarity and accountability in how foundational traceability data are defined, shared, and governed. Increasingly, both regulators and industry partners recognize that consistent data responsibilities—defining who captures, maintains, and shares key data elements (KDEs)—are essential to ensuring end-to-end data integrity. Clearly defined data requirements are a foundational step toward	IFT

interoperability, serving as the common baseline that enables systems to exchange and interpret information consistently. Efforts are shifting from voluntary guidelines toward structured governance models that assign clear data ownership at each supply chain step. This approach clearly lays out the responsibilities of individual supply chain entities based on the activities they perform, such as transformation or processing, shipping and receiving, and repacking, reducing ambiguity and enabling greater confidence from both industry and regulators in demonstrating compliance. CCFICS can develop guidance around the development and implementation of structured governance models to enable Traceability.

- Traceability Standardization & Interoperability

Standardization and interoperability remain at the center of the global traceability conversation, with a growing focus on enabling seamless data exchange across systems, sectors, and borders. Emerging trends highlight the move from conceptual alignment to practical implementation—using common data models, standardized event structures, and open APIs to connect diverse digital ecosystems. Adoption of globally recognized frameworks such as the Global Dialogue on Seafood Traceability (GDST), UN Transparency Protocol and other commodity specific traceability frameworks based on commonly used data standards continues to expand. Alignment of these approaches allows for the development of conformance tests and shared implementation tools that simplify integration. As interoperability becomes a regulatory and commercial expectation, the emphasis is shifting toward ensuring that systems not only communicate but also interpret data consistently, reducing duplication, lowering technical barriers for small and medium enterprises, and accelerating global alignment around a common digital language for supply chain data. Development of Codex guidance around interoperability would provide an excellent basis for furthering global traceability systems implementation.

- Traceability Harmonization Across Commodities

As individual commodity sectors advance their traceability ambitions, emerging trends show a growing recognition of the inefficiencies caused by developing standards in isolation. Cross-commodity harmonization efforts are increasingly focused on identifying a shared set of core data elements, event types, and verification requirements that can be applied consistently across sectors. This alignment enables interoperability across value chains, reduces duplication for companies operating in multiple commodities, and facilitates compliance with broad sustainability and due diligence regulations. Cross-commodity alignment also enables the development and reuse of shared digital tools and infrastructure. Investments made under one regulatory or sectoral initiative can be leveraged across other commodities operating under similar traceability principles, allowing implementation in one area to accelerate progress in another. Collaborative initiatives as diverse as cattle and seafood are testing the feasibility of cross-sector data frameworks, demonstrating that common architectures can support diverse regulatory and market needs. Over time, this convergence is laying the groundwork for a globally coherent traceability infrastructure capable of supporting integrated reporting, risk assessment, and trade facilitation across all major commodities. Development of such a globally coherent traceability infrastructure approach is an emerging opportunity for CCFICS to focus on.

- Traceability Alignment - Regulatory Agencies

Regulatory agencies around the world are increasingly recognizing the need to align traceability frameworks to reduce fragmentation and enable more effective data exchange across borders. While most systems remain developed independently, there is growing acknowledgment that an event-based data model provides the structure needed to achieve interoperability across jurisdictions. Indonesia has taken a leading role, committing to align its national traceability system with the Global Dialogue on Seafood Traceability (GDST) standard, signaling a broader movement toward internationally recognized, interoperable frameworks. In the United States, the FDA's Food Safety Modernization Act (FSMA) Section 204 rule also builds on an event-based approach, defining critical tracking events and key data elements to standardize recordkeeping and strengthen traceability within the covered supply chains. Australia's Department of Agriculture, Fisheries, and Forestry (DAFF) 2023–2028 National Agricultural Traceability Strategy likewise prioritizes alignment of data standards, regulatory frameworks, and industry practices to enhance interoperability, reduce duplication, and drive innovation across the agricultural sector. As regulators work toward greater coordination, the emphasis is shifting toward defining

common data structures and identifiers that support mutual recognition and streamlined compliance. This evolution lays the groundwork for cross-border and inter-agency interoperability, allowing competent authorities to access standardized data in near real time while maintaining regulatory autonomy. The development of guidance and standards for cross-border and inter-agency system interoperability by CCFICS would provide a foundation for global, multi-commodity traceability systems. • Traceability Alignment – Industry Across industry, alignment efforts are increasingly focused on translating shared traceability principles into consistent operational practice. Companies, certification programs, and technology providers are moving from pilot projects toward sector-wide implementation using common data structures and event models. At the same time, the lack of universally accepted standards continues to create friction, as some major brands and retailers pursue proprietary or single-system approaches that require suppliers to conform to specific platforms. This has prompted significant pushback from suppliers, who face increased costs from licensing fees, duplicative reporting, and limited flexibility to use tools best suited to their operations. In response, there is growing momentum toward open, standards-based models that prioritize interoperability over exclusivity. Emerging initiatives are testing capability assessments and conformance tools that allow suppliers to demonstrate alignment with recognized traceability standards, creating a common baseline for data exchange and compliance. Collaborative stakeholder groups are also co-developing open-source resources and onboarding toolkits to support enterprises of all sizes, helping ensure that digital traceability systems are inclusive, scalable, and aligned with evolving regulatory expectations. IFT encourages CCFICS to consider movement from common traceability principles to deeper levels of traceability tool alignment.	
Issue no 1. CXG 25-1997 We support the new work proposal submitted by the European Union: Development of principles for the risk analysis of new food sources and production systems (NFPS). The proliferation of innovations in NFPS targeting babies has led to many misleading claims for baby foods illustrating the urgent need for greater due diligence in the scientific process to avoid possible conflicts of interest. Once again the need for this proposal, was questioned by those promoting novel foods.	ENCA
Issue no 1. Perú considera que estos temas son de prioridad media, por cuanto estas tecnologías facilitan y agilizan el comercio, y no tendrían un impacto directo en la inocuidad de los alimentos.	Peru
Issue no 1. CXG 91-2017 CXG 101-2023	New Zealand
Issue no 1. Proposed Guidance on Recognition and Maintenance of Equivalence of NFCS Replace with: CXG 101-2023	United Kingdom
Issue no 1. Proposed Consolidation of Guidance on Recognition and Maintenance of Equivalence of NFCS Amend to the work on Consolidation and add CXG/101-2023 to the list of completed retted text	New Zealand

Issue no 1. Priority: Rated high with estimated medium impact on food safety and trade by some members in their responses to CL 2023/66-FICS issued in 2023). Rationale: These technologies represent a significant subset of ‘new foods and production systems’ and are now commercially relevant. They raise practical questions for control authorities, including the application of risk-analysis principles, the adaptation of good hygiene practice, and appropriate approaches to assurance, inspection and monitoring. It is therefore prudent for CCFICS to monitor these developments, including potential work on issues under discussion in other Codex Committees.	United Kingdom
Issue No. 1: New and evolving food production, processing, transport and distributing systems and technologies. The Philippines recognizes that this issue is highly relevant to existing traceability systems and the transport of food products equipped with temperature monitoring devices and cold chain management systems. In several developed markets, regulations require remote and real-time monitoring of freezing equipment for both land-based establishments and freezer vessels supplying fishery products for export. The Philippines considers this matter as high priority with significant impact, given documented cases of product rejections due to temperature fluctuations and resulting decomposition during transport.	Philippines

Issue no 2 - Impact of new technologies and tools on training, development and monitoring of food control systems, information sharing and approach to government regulation and compliance activities.	
Issue no 2. With regard to Issue 2 (new technologies and tools), further consideration could be given to data governance, cybersecurity risks, and data integrity as integral components of digitalization and AI-based regulatory approaches	Iran
The UK suggests expanding this issue to explicitly include: (a) AI governance and transparency requirements; (b) regulatory-assurance frameworks for algorithmic decision-making; (c) interoperability and data-exchange standards; and (d) cybersecurity and data-assurance frameworks that underpin digital NFCS functions.	United Kingdom
It is proposed to explicitly address the challenge of “validation and reliability of data generated by artificial intelligence” in the “New Technologies” section. Supervisory systems need clear criteria to ensure that the output of algorithms in inspection and certification is fair, transparent and auditable.	Iran
Supports the proposal by building capacity in understanding and testing of new food production methods. It should be rated as priority number 3	Uganda

Proposal 2: Impact of new technologies and tools on training, development and monitoring of food control systems, information sharing and approach to government regulation and compliance activities. United Arab Emirates considers this topic highly relevant and timely in the context of rapidly evolving global food systems and increasing digitalization of official control functions. UAE recognizes that digital tools are fundamentally reshaping how food control systems operate, including: Online training platforms and virtual competency development for inspectors, AI-enabled monitoring and performance dashboards, Integrated data management and real-time compliance tracking. These tools are increasingly used by competent authorities in United Arab Emirates to improve the consistency, efficiency, and responsiveness of official controls. For example, AI and connected cameras/sensors (IoT) Visual Inspection Project aims to develop a visual monitoring system using artificial intelligence, Internet of Things and machine learning technologies in targeted food establishments, to improve tracking, monitoring and enforcement capabilities and enhance monitoring and inspection processes with modern AI-based systems. Also, Smart monitoring systems for food establishments are used to answer the inspector's questions about the facility's record and to recommend the most appropriate action in case of repeated violations and suggest daily inspection priorities. The Self inspection system is a routine inspection task carried out by the facility officer to examine all operations within the establishment and document observations and actions taken using the approved forms.	United Arab Emirates
Artificial Intelligence as a Traceability Enabler Artificial intelligence (AI) is rapidly emerging as a transformative enabler of traceability, unlocking new efficiencies in data capture, integration, and analysis across global supply chains. Machine learning and natural language processing are increasingly being applied to digitize analog records, automate data mapping, and detect inconsistencies in real time—reducing the manual burden historically required for verification and compliance. As interoperability frameworks mature, AI tools are helping to translate and align disparate data formats, serving as the connective issue between systems that were not originally designed to communicate. At the same time, AI is transforming how digital tools themselves are being built—through AI-assisted coding and model-driven development, the creation of custom, domain-specific tools for industry use is becoming faster, cheaper, and more accessible. Beyond automation, AI-driven analytics are beginning to reveal patterns in supply chain behavior, helping companies identify risk hotspots, optimize sourcing decisions, and strengthen assurance systems. Together, these capabilities are laying the foundation for more adaptive, intelligent traceability infrastructures that evolve alongside market and regulatory demands. • Artificial Intelligence as a Traceability Risk While AI offers enormous potential to accelerate digital transformation, it also introduces new risks that could undermine traceability if not guided by strong data and interoperability principles. Even advanced AI models need consistently defined data elements; otherwise, they may amplify inconsistencies instead of enabling meaningful comparisons. The effectiveness of AI in traceability depends on embedding clear, standardized data requirements that enable systems to interpret and exchange information reliably. At the same time, the rise of AI-assisted development poses a parallel risk: as more organizations use generative tools to rapidly create digital solutions, the proliferation of unaligned, proprietary systems could lead to an untold number of new data silos unless interoperability is designed in from the start. Managing these risks requires not just technological innovation, but governance frameworks and shared standards that ensure AI enhances, rather than fragments, global traceability systems. IFT believes this is a critical area of focus for CCFICS over the next few years. • AI Risk-Based Auditing Ongoing digital transformation and the integration of artificial intelligence into inspection, auditing, and certification systems is transforming how compliance is assessed. Rather than relying solely on static, document -based reviews, AI systems can continuously analyze event-level traceability data to identify anomalies or patterns that indicate potential non-compliance. AI systems can also link traceability data with other standardized information streams to flag inconsistencies between reported activities and observed behavior. For example, in the seafood sector, AI can be used to link reported traceability data with regulatory licensing and registration databases, vessel monitoring systems, and	IFT

satellite imagery to verify both the accuracy and legality of reported activity. This enables inspectors and certifiers to target investigations or interventions where the risk of non-compliance is greatest. This data-driven, risk-based approach improves both the efficiency and accuracy of oversight, allowing limited resources to be used strategically. For regulators, it can enhance the integrity of inspection programs; for certification systems, it can increase confidence in verification outcomes. However, the effectiveness of these AI-enabled approaches depends on the availability of standardized, interoperable data streams; without these, the underlying insights remain incomplete or misleading. To ensure trust in AI-assisted decisions and conclusions, developed frameworks must include transparent algorithmic logic, validation protocols, and clear auditability standards, key guidance areas for CCFICS to focus on near-term. When responsibly implemented, AI-supported inspection and certification can transform compliance oversight from a periodic exercise into a continuous, adaptive process that strengthens assurance across the entire food system.	
Issue no 2. Perú considera el tema de alta prioridad, y sugiere que los textos del Codex sean sistematizados a través de guías o directrices que permitan que todos los países puedan estar armonizados en la implementación de sus sistemas nacionales de control de los alimentos.	Peru
Issue no 2. CXG 101-2023 Proposed Principles and guidance of Digitisation of NFCS Add the new work related to this issue	New Zealand
Issue no 2. Priority: Rated high with estimated high to medium impact on food safety and trade. Rationale: Digital and AI-based systems increasingly inform the delivery of risk-based regulatory controls. However, potential regulatory-assurance gaps may emerge, particularly in relation to model validation, bias management, explainability and cybersecurity, all of which are important for maintaining transparency and trust in NFCS.	United Kingdom
Prioridad: Calificada como alta. Se estima que este tema tiene una repercusión alta en la inocuidad alimentaria y el comercio. Perú mantiene los comentarios anteriormente enviados . Además, hace notar que, los cambios gubernamentales por los que vienen atravesando los países de CCLAC pueden ralentizar la evolución de estos procesos y la coordinación intergubernamental.	Peru
Issue No. 2: Impact of new technologies and tools on training, development and monitoring of food control systems, information sharing and approach to government regulation and compliance activities. The Philippines recognizes the benefits of online platforms for knowledge exchange on food safety regulations, and processing technologies, as well as the growing use of remote audits for accreditation to ensure compliance and optimize government resources. However, the Philippines notes that limitations in internet connectivity and digital infrastructure in developing countries may constrain full implementation. While this may be considered a lower priority issue, it has a significant impact on both importing and exporting countries. The Philippines therefore supports flexible and hybrid approaches, alongside capacity-building initiatives, to ensure inclusive and effective implementation.	Philippines

Issue no 3 - Evolving role of competent authority and interactions between various government entities.	
Issue no 3. Colombia está de acuerdo en que la repercusión en el contexto de la inocuidad alimentaria y el comercio para trabajar este tema en el CCFICS sea alta y que, de esta forma, se priorice en su estudio como propuesta de nuevo tema de trabajo. Este tema corresponde al número 5 de la lista resultante del taller realizado el 21 de mayo de 2024. Este tema consideraría la necesidad de fortalecer los mecanismos de coordinación entre los distintos organismos gubernamentales, sus dinámicas y cambios para la realización de las funciones esenciales de Inspección, Vigilancia y Control de alimentos y su impacto en el comercio local y global, con desafíos como la duplicidad de funciones, la fragmentación normativa y la falta de interoperabilidad entre sistemas, lo que exige avanzar hacia modelos de gobernanza más integrados y colaborativos. Según los temas revisados en el taller celebrado el 21 de mayo de 2024, Colombia considera que adicional a los tres (3) temas que se listan en el apéndice A de la carta circular, sería recomendable revisar los siguientes: 1. Listados de establecimientos – Corresponde al tema 6 del taller. 2. Digitalización de los sistemas nacionales de control de los alimentos – Corresponde al tema 7 del taller. 3. Utilización de la inteligencia artificial – Corresponde al tema 8 del taller. Los tres (3) temas listados ya considerados por el CCFICS en su vigésima séptima reunión se interrelacionan. Para Colombia los listados de establecimientos son el mecanismo para mantener los registros de las habilitaciones de países que exportan alimentos de origen animal. Son necesarios en cualquier sistema de control de alimentos. Contar con información actualizada, completa y accesible sobre los establecimientos de donde se originan las importaciones permite gestionar inspecciones y tomar decisiones. Por tanto, se espera el llamado de Noruega a trabajar en este tema. En cuanto a la Digitalización de los sistemas nacionales de control de los alimentos, la importancia radica en que se facilita el monitoreo, la gestión de alertas y la interoperabilidad entre entidades, reduciendo errores y agilizando los procesos. Por tanto, se espera el llamado de Australia a trabajar en este tema. La Utilización de la inteligencia artificial apoya las actividades de las autoridades sanitarias entre muchas cosas, para predecir riesgos sanitarios, optimizar asignación de recursos y apoyar la toma de decisiones. Además, puede facilitar la automatización de tareas repetitivas y generación de reportes confiables. Por tanto, se espera el llamado de Reino Unido a trabajar en este tema. En el marco del fortalecimiento de la gestión pública y la garantía de la inocuidad alimentaria, es prioritario avanzar en la consolidación de los listados de establecimientos, para la planificación y ejecución de acciones de control. Esta información debe integrarse en la digitalización de los sistemas nacionales de control de los alimentos, con el fin de mejorar la eficiencia operativa y la interoperabilidad entre entidades. Y por supuesto, se reconoce el potencial transformador de la inteligencia artificial. Por lo tanto, se respalda la necesidad de trabajar estos tres componentes listados en el marco del CCFICS como futuros trabajos, ya por todos conocidos con anterioridad.	Colombia
Issue no 3. Iran recommends highlighting the importance of clear institutional roles, information-sharing mechanisms, and coordination frameworks between food control authorities and border or customs agencies to ensure effective implementation without duplication of controls.	Iran
Issue no 3. Supports the inclusion of the item in the priority list being the highest priority on the list and rated as NO.1. This is because of the need to streamline inter-governmental collaboration and the use of digital tools to improve communication and data sharing across different levels of government in order to avoid confusion.	Uganda
Issue no 3. The UK suggests adding the following additional explanatory narrative: "...including opportunities to better leverage information through border-modernisation initiatives, multi-agency digital risk systems, enhanced data-sharing, and common surveillance-intelligence frameworks."."	United Kingdom

Issue no 3 Proposal 3: Evolving role of competent authority and interactions between various government entities. United Arab Emirates considers that the increasing complexity of global food supply chains, the expansion of cross-border trade, and the integration of new regulatory and technological approaches require strengthened coordination and clearly defined roles among competent authorities and other relevant government entities. This work is therefore viewed as timely and directly relevant to the mandate of CCFICS in promoting effective, transparent, and harmonized inspection and certification systems.	United Arab Emirates
Issue no 3. Interaction among <u>and between</u> various governmental entities involved in food trade, in particular between food control authorities and customs/border protection agencies, and the ability to better leverage information from these interactions.	New Zealand
Issue no 3. <u>CXG 60-2006</u> CXG 82-2013 Adding missing text	New Zealand
Issue no 3. CXG 101-2023 <u>Proposed additional guidance on Establishment listing (Annex to CXG 89-2016)</u><u>Proposed guidance on Appeals Mechanism on Rejected Food</u><u>Draft Guidance on Prevention & Control of Food Fraud</u><u>Draft Revision of Principles for Traceability (CXG 60-2006)</u> Adding the current approved work that relates to this issue	New Zealand
Issue no 3. Priority: Rated high with estimated high impact on food safety and trade It is essential that Governments carry out regular inspections, monitoring, inspection and auditing of food business operators. It is inappropriate to trust that for profit businesses will follow the highest standards voluntarily. The system must be fundamentally changed. The patchy response from health authorities regarding the recent commercial formula contamination crises, resulted in no transparency or explanations about what really happened or how the crises were managed. The task of import and export operators to ensure that products are safe will be impossible unless these issues are frankly and honestly addressed and there is prior oversight by independent authorities of food safety systems. The system must not be left in the hands of financially interested parties.	ENCA
Issue no 3. Priority: Rated high with estimated high impact on food safety and trade Rationale The operational reality of imports and exports increasingly depends on digital border architecture that enables secure, efficient data-sharing between competent authorities and border agencies. This underpins risk-based targeting, supports the timely verification of assurances provided upstream within NFCS, and strengthens the overall effectiveness of import/export controls	United Kingdom
Issue No. 3: Evolving role of competent authority and interactions between various government entities. The Philippines underscores the vital role of the Competent Authority and effective inter-agency coordination in promoting ease of doing business and adapting to emerging trade trends. Clear delineation of food safety mandates, harmonized requirements, and streamlined processes are essential to avoid duplication and overlapping functions. The Philippines considers this issue as high priority with high impact, given its direct implications on trade and stakeholders across the entire supply chain.	Philippines