

## ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 34<sup>th</sup> SESSION OF THE CODEX COMMITTEE ON GENERAL PRINCIPLES (CCGP34)

Prepared to Support the Participation of Codex Communities of Practice Supported by GFORSS

2 – 6 June 2025 • Lille, France

### Disclaimer and Disclosure of Interest

*It is important to note that the proposed analysis and associated conclusions and recommendations stem from the work of independent food regulatory experts. The analysis and associated recommendations or positions are presented as mere suggestions and should not be considered as a direction or final recommendation to the competent authority empowered to develop and endorse Codex positions.*

**Disclosure of Interest:** *Experts involved in the development of this analysis contribute to various food safety and nutrition regulatory capacity building initiatives funded by other Governments, aid agencies, industry and international organizations.*

### OBJECTIVES

This document offers an analysis of agenda items to support participation in the 34<sup>th</sup> session of the Codex Committee on General Principles (CCGP34), taking place in Lille, France, from 2 – 6 June 2025.

The document is intended for possible use by the Codex communities of practice promoted by the [Global Food Regulatory Science Society \(GFORSS\)](#), as part of their contribution to enhancing awareness and supporting effective participation in international standard-setting meetings (Codex meetings), by representatives from member countries and observers.

This document will offer an analysis of select key agenda items to support the development of positions at the national and regional levels. This analysis is indicative in nature and does not represent an official position of the organization, its membership or its management.

The analysis provided in this document offers a factual review of key agenda items of CCGP34, pertaining to:

- A. [Agenda item 4.1: Review of the Procedures in Section 3: Guidelines for Subsidiary Bodies](#)
- B. [Agenda item 4.2: Review of Inconsistencies in Language and Superseded Content \(Excluding Section 3\)](#)
- C. [Agenda item 5: Guide to the Procedure for the Amendment and Revision of Codex Standards and Related Texts](#)
- D. [Agenda item 6: Proposed Amendment to the Principles Concerning the Participation of International NGOs in the work of the Codex Alimentarius Commission](#)
- E. [Agenda item 7: Resource-Efficient Review of New Work Proposals Outside the Remit of Active Committees](#)
- F. [Agenda item 8: Review of Guidelines for Committees Working by Correspondence \(CWBC\)](#)

**A. Agenda item 4.1: Review of the Procedures in Section 3: Guidelines for Subsidiary Bodies**

Document Number: CX/GP 25/34/4

Status in Codex Process: N/A

**Background**

Following the recommendation of CCGP33, a working group led by the United States and France conducted a review of Section 3 of the Codex Procedural Manual, which outlines the guidelines for subsidiary bodies. The group was tasked with proposing updates after two rounds of consultation with 13 host secretariats. The review aimed to modernize procedures and ensure alignment with current working practices. Consultations took place in 2024, resulting in a final proposal of updates for discussion at CCGP34.

**Analysis**

- ❖ **Need for Harmonization of Terminology:** Inconsistencies in terms like “host country,” “Member nation,” and “Codex Secretariat” were identified across guidelines, necessitating alignment with current Codex usage and FAO/WHO texts.
- ❖ **Virtual Modalities Excluded from Formal Integration:** Although many proposals supported formal inclusion of virtual sessions (e.g., VWGs), the Codex Secretariat advised this fell outside FAO’s legal framework, limiting their integration.
- ❖ **Inconsistencies in PWG and EWG Procedures:** Several provisions related to the composition, notification, and registration of working groups were outdated or unclear, especially for PWGs, leading to a need for clarification and restructuring.
- ❖ **Observer Participation Rights Questioned:** The ability of Observer countries to record opposition in reports (Paragraph 32) was flagged as a legal concern, as they lack voting rights—requiring resolution by CCGP34.
- ❖ **Step 5/8 Procedure Reference Ambiguity:** Adding Step 5/8 in circular letters prompted debate, as it’s not clearly referenced in the uniform step process and may require updates in Section 2 of the Manual.

**Key Amendments**

- ❖ **Terminology Harmonized for Consistency:** Outdated or ambiguous language was revised to align with current Codex practices, improving clarity across Section III.
- ❖ **New Roles Defined:** Roles such as co-hosts and assistants were formally introduced, reflecting evolving working modalities and Secretariat support structures.
- ❖ **Working Group Procedures Clarified:** Detailed guidance was added on EWG registration, CRD submission, and PWG participation, including provisions for virtual attendance.
- ❖ **Restructuring for Logical Flow:** Sections were reorganized to improve readability, group similar functions, and align the flow with Codex session procedures.
- ❖ **Observer Participation Addressed:** Provisions regarding how observer comments and oppositions are recorded were clarified following concerns raised at CCGP33.
- ❖ **Step 5/8 Procedure Flagged:** The fast-track adoption mechanism was retained but flagged for further clarification, recognizing a lack of procedural detail.

**Recommendations**

- Seek clarification from the Secretariat on how the Procedural Manual could be updated to reflect the use of virtual formats, and/or request input from the FAO and WHO representatives regarding ongoing organizational discussions on this practice.

- Delegations are encouraged to monitor discussions on the updated PWG and EWG procedures, including co-hosting, and guidance on participant registration, as it improves access and coordination for all members.
- Delegations are encouraged to monitor discussions on co-hosting responsibilities and cost allocation, to ensure that smaller or less-resourced countries are not excluded from leadership roles.
- Recommend further clarification of Step 5/8 to ensure a shared understanding and consistent implementation across committees.
- Taking into consideration the discussions that will be held during the Committee, the proposed revisions to Section 3 could be forwarded to CAC48 for final adoption and subsequent integration into a future edition of the Procedural Manual.

## B. Agenda item 4.2: Review of Inconsistencies in Language and Superseded Content (Excluding Section 3)

Document Number: CX/GP 25/34/5

Status in Codex Process: N/A

### Background

This document responds to a request from CCGP33 and CAC46 to review and update outdated or inconsistent content in the Codex Procedural Manual (excluding Section 3). Members feedback was submitted in response to a circular letter issued in March 2024 (CL 2024/27-GP), and upon request from CAC47 for the Codex Secretariat to undertake a follow up in response to the comments submitted, and preparing a document based on the possible superseded content and other issues identified by Members in the Codex Procedural Manual for consideration by CCGP34, also noting the actions already implemented in the 30<sup>th</sup> edition and planned for the 31<sup>st</sup> edition regarding language inconsistencies and translation errors.

### Analysis

- ❖ **Outdated Terminology for Document Access:** Terms like “receive” were based on outdated paper-based distribution methods, creating inconsistencies with current Codex practices that rely on digital access.
- ❖ **Lack of Explanation for Step 5/8:** The absence of a definition for this fast-track adoption process caused confusion for Members, especially those unfamiliar with its procedural shortcut.
- ❖ **Rigid Calendar-Based Timelines:** Timelines expressed in calendar years were difficult to apply during unforeseen delays, such as global disruptions, highlighting the need for session-based references.
- ❖ **Unnecessary Redundancies in Publication Provisions:** Several procedural references duplicated information or referred to outdated methods, reducing the clarity and efficiency of the Manual.

### Key Amendments

- ❖ **Clarification of Step 5/8:** A footnote was added to define Step 5/8, explaining that it allows adoption at Step 5 and direct finalization at Step 8.
- ❖ **Timeline Adjustments:** Calendar-based year references were replaced with session-based progress markers to allow more flexibility during delays.
- ❖ **Updated Terminology for Document Access:** Words like “receive” were replaced with “access” to reflect current digital distribution practices for Codex documents.
- ❖ **Deletion of Obsolete References:** Several outdated provisions related to physical publication and manual distribution were removed for clarity.

## Recommendations

- Support adjustments to standard development timelines which offer practical flexibility and reduce pressure on committees during disruptions, especially during major global interruptions such as pandemics.
- Support the approval of updates to CCP and Observer, as it accurately reflects current practices.
- Taking into consideration the discussions that will be held during the Committee, the proposed revisions could be forwarded to CAC48 for final adoption and subsequent integration into a future edition of the Procedural Manual.

## C. Agenda item 5: Guide to the Procedure for the Amendment and Revision of Codex Standards and Related Texts

Document Number: CX/GP 25/34/6

Status in Codex Process: N/A

## Background

This document continues the review initiated at CCGP32 and expanded through CCGP33 and CL 2024/25-GP. It proposes revised definitions for correction, amendment, and revision, updates procedures to align with FAO publishing practices, and reintroduces the term revision instead of "new edition" to avoid confusion. The aim is to standardize how changes to Codex texts are described, processed, and published, while improving transparency and traceability through a revision tracking system.

## Analysis

- ❖ **Unclear Definitions of Document Changes:** The absence of formal definitions for correction, amendment, and revision led to inconsistent use and confusion across Codex work.
- ❖ **Terminological Overlap with FAO Publishing:** The term "new edition" conflicted with FAO's own terminology, causing uncertainty for users interpreting Codex updates.
- ❖ **Lack of Transparency in Change Justifications:** Without a requirement to justify amendments or revisions, stakeholders lacked insight into the reasoning behind procedural changes.
- ❖ **Unassigned Responsibility for Updates:** In situations where no active committee existed, it was unclear who should update Codex texts, risking delays in maintaining standards.

## Key Amendments

- ❖ **New Definitions Introduced:** Part 7 of the Manual now includes formal definitions for "Correction," "Amendment," and "Revision," each with specific procedural implications.
- ❖ **Terminology Updated:** All uses of "new edition" were replaced with "revision" to ensure alignment with FAO's editorial standards.
- ❖ **Justification Requirement Added:** A "corrigendum" is required within the updated Codex standard or related text, with a clear explanation for old and new text, date of correction to
- ❖ **Secretariat Responsibility Clarified:** When no active committee exists, the Codex Secretariat is now authorized to manage procedural updates to relevant texts.

## Recommendation

- Endorse the requirement for corrigenda and explanations to accompany corrections, amendments, and revisions, as this improves transparency for users of Codex texts.

- Encourage the continued role of the Codex Secretariat in managing updates to Codex standards and related texts from inactive/dissolved subsidiary bodies, ensuring no disruption in standard maintenance.
- While further detailed analysis may be required, delegations may provide general support for the proposed updates to Section 2.1 of the Procedural Manual (Procedures for the Elaboration of Codex Standards and Related Texts).

## D. Agenda item 6: Proposed Amendment to the Principles Concerning the Participation of International NGOs in the work of the Codex Alimentarius Commission

Document Number: CX/GP 25/34/7

Status in Codex Process: N/A

### Background

This document was prepared by the Codex Secretariat in collaboration with the FAO and WHO Legal Offices, in response to concerns raised about the interpretation of the double representation clause in the Codex Principles for NGO participation. The concern is that the clause appears under a heading that could mistakenly suggest it applies only to certain INGOs. To clarify that the rule applies to all INGOs holding observer status, a new heading is proposed before Paragraph 24.

### Analysis

- ❖ **Misleading Placement of Double Representation Rule:** The rule's location under a section for FAO/WHO-related INGOs implied it did not apply to all observer organizations, resulting in unequal interpretation of participation rights.

### Key Amendments

- ❖ **New Heading Inserted Before Paragraph 24:** A heading titled "Relations between international non-governmental organizations holding observer status with Codex" was added to clarify that the double representation rule applies to all INGOs, not only those affiliated with FAO or WHO.

### Recommendation

- Support the addition of the new heading, as it helps clarify that the double representation rule applies equally to all Codex-accredited INGOs, regardless of their relationship with FAO or WHO, and encourage clear communication of this change to observer organizations, to prevent future misunderstandings in meeting participation.

## E. Agenda item 7: Resource-Efficient Review of New Work Proposals Outside the Remit of Active Committees

Document Number: CX/GP 25/34/8

Status in Codex Process: N/A

### Background

This document responds to a request from CCEXEC87 and CAC47 to examine how the Codex Procedural Manual can support a more resource-efficient review process for new work proposals that do not fall under the scope of an active committee. The Codex Secretariat reviewed existing provisions and past practices and presents possible options to support Member-driven proposals without requiring the immediate creation or reactivation of a committee.

## Analysis

- ❖ **Lack of Procedures for Proposals Without a Responsible Committee:** Codex lacks a clear process for handling new work that falls outside the scope of active committees, limiting timely review of emerging issues.
- ❖ **Resource-Intensive Committee Reactivation:** The default response of reactivating dormant committees or creating new ones is inefficient and poses challenges for resource-constrained countries.
- ❖ **Limited Use of Virtual Engagement Tools:** Without mechanisms like webinars or virtual consultations, opportunities for early technical discussions are missed, especially for smaller delegations.

## Key Amendments

- ❖ **Conceptual Options Presented:** No procedural changes were proposed, but the document outlines practical alternatives such as engaging regional coordinating committees, hosting webinars, or temporarily reactivating inactive committees to assess new work proposals outside existing scopes.

## Recommendation

- The use of webinars or virtual sessions may be encouraged to engage Members and Observers before formal submission.

## F. Agenda item 8: Review of Guidelines for Committees Working by Correspondence (CWBC)

Document Number: CX/GP 25/34/9

Status in Codex Process: N/A

## Background

This document responds to a request from CAC47 and CCEXEC87 to assess the practical use and limitations of the current Codex guidelines for Committees Working by Correspondence (CWBC). Based on recent experiences with CWBCs (e.g., CCFFP and CCCPL), the Codex Secretariat proposes clarifying the scope of CWBCs and introducing limited flexibility to use virtual meetings with simultaneous presence, when needed to complete specific tasks.

## Analysis

- ❖ **Restrictions on Virtual Engagement:** CWBCs could not use virtual formats for coordination, making it harder to address technical matters or build consensus across regions.
- ❖ **Undefined Scope of CWBC Mandates:** CWBCs sometimes exceeded their intended tasks due to vague or broadly framed assignments from CAC.
- ❖ **Absence of Timeframe Guidance:** Without a defined duration or timeline, CWBCs lacked structure, which affected planning, participation, and accountability.

## Key Amendments

- ❖ **Scope Clarification Added:** A clause was introduced stating that CWBCs must focus solely on the topic assigned by CAC.
- ❖ **Virtual Participation Allowed:** New language permits the use of virtual tools for specific CWBC tasks under exceptional circumstances.
- ❖ **Assignment Parameters Specified:** Section 4.5 was revised to require CAC to define the scope and duration of a CWBC's mandate at the time of establishment.

## Recommendation

- Support the proposed flexibility to allow virtual meetings with simultaneous presence, only for specific tasks, as a tool for efficiency and consensus-building in CWBCs.