

Combined comments to Codex Executive Committee regarding the Codex Strategic Plan 2026-2031 Key Questions: CL 2024/10-EXEC from the following joint Codex observer organizations:

AOAC International

European Federation of the Associations of Dieticians

International Life Sciences Institute

NSF International

Institute of Food Technologists

American Society for Nutrition

As independent Codex Observer organizations, we jointly submit these prioritized comments on the Codex Strategic Plan two questions found in CL 2024/10 to the Codex Executive Committee for consideration in the development of the final plan document.

Regarding Key Question #1: What could Codex do to have the greatest impact on the protection of consumer health and promotion of fair practices in food trade in the period 2026-2031?

1. Development of globally harmonized food safety risk assessments and guidance on data interpretation procedures, inclusive of nutritional risks. Specifically, we recommend developing codes of practice or guidance for member countries to use to help guide them in conducting risk assessments and data interpretation procedures to drive global harmonization of such assessments and procedures, inclusive of food safety and nutrition, thereby enhancing global food security.
2. Continued deep focus on harmonized, scientifically based food safety standards, codes of practice and guidance to member countries to protect human health most effectively and efficiently manage the global food supply chain. Specifically, we highlight the following six areas as the most critical of the Codex mandate over the strategic plan period, with increased scientific support from WHO/FAO funding:
 - a. Food Contaminants
 - b. Food Traceability
 - c. Analytical Methods Harmonization
 - d. Emerging Microbiological Hazards
 - e. Food Additive Safety
 - f. Food AllergensWhile these areas are part of the existing work of Codex, it is our perspective that they need enhanced focus out of the totality of the current work within Codex.
3. Development of harmonized codes of practice and guidance on human dietary nutrient needs across demographics (age, sex, region, etc.), leveraging existing regional practices where there is consensus, targeting the most vulnerable populations facing food insecurity, and targeting the medical and nutrition scientific communities (pediatricians, nutritionists, dietitians).

4. Develop with WHO/FAO mechanisms for real-time sharing of national/regional food safety challenges to facilitate public health protection and to better protect the global food supply and trade.
5. Development of Codex guidance on the intersection of food safety hazards (e.g., contaminants) with dietary recommendations and risk profile to human health, targeting communications toward consumers. Specifically, there has been little development of guidance to date globally regarding this intersection within the Codex mandate on human health that encompasses both nutrition and diet and considers those recommendations in light of the implication of inherent food safety hazards within the food supply. Examples include: broad based guidance on the top natural or man-made food contaminants such as heavy metals or industrially produced trans fats, and food allergens in an increasingly interconnected world.
6. Conduct a review with WHO/FAO of the support provided for scientific expert assessments, with a particular focus on JECFA. It is our perspective that JECFA is overloaded with requests for work, forcing many of the committees to prioritize requests, and that this is hindering the timely progress of Codex committee work. It is our recommendation that WHO/FAO work with Codex to split JECFA activities into two expert bodies supported by additional capacity/funding to better enable the progress of the committees. JECFA originated in the 1950's and has been a very successful activity of the UN in support of Codex, but its remit has expanded significantly over the six decades of Codex work. Our recommended approach would be to create and fund capacity for these two expert bodies:
 - a. A Joint Expert Committee whose focus is solely on Food Additives, Processing Aids and Packaging Materials
 - b. A joint Expert Committee whose focus is solely on Natural and Synthetic Contaminants and Veterinary Drugs

By creating these two scientific bodies with refined areas of focus, we believe Codex would be enabled to more efficiently and effectively conduct the numerous food safety challenges facing the global food supply chain.

7. Develop Codex mandate relevant intersection groups with other UN bodies by setting up interagency, multidisciplinary, collaborative, member-based groups building upon the Codex model of member country voluntary participation to coordinate efforts toward specific One Health initiatives for Codex, particularly expanding Codex type scientific risk characterization activities around a sustainable food supply and environment. Move beyond "international standards days" to applicational models and measuring results.
8. Development of codes of practice and guidance around science-based approaches to a sustainable food system (e.g., reduction of food waste and food losses across the supply chain, beginning with the source (farm/lake/ocean to end consumption). Specifically, we would focus on:
 - a. Losses due to spoilage by micro-organisms from poor storage practices (development of further, broad-based guidance across critical, prioritized food commodities either globally or regionally).
 - b. Food waste at consumer retail or food service locations (e.g., fresh produce loss reduction, damaged goods recovery methods, recovery and utilization of unused prepared food).
 - c. Development of the scientific basis for sustainability labeling to enable guidance for members.

Regarding Key Question #2: Consistent with its purpose, how can Codex respond to food safety, nutrition and food quality implications of and support efforts to address, the drivers for change that have been identified in the related draft section of the Strategic Plan 2026-2031?

Within the key drivers outlined in the Codex Strategic Plan, we would highlight the following key response approaches:

- **Emerging issues in food and feed safety:** Codex should seek to leverage the existing Codex structure to address these issues as they are brought forward, as long as they fit the existing Codex scope and mandate. The ad hoc task forces on special topics should be reserved for specific, challenging topics that move outside the current existing Codex structures. An ad hoc task force on global risk management harmonization would fit such criteria.
- **Global political, environmental, economic and health issues:** We agree that adapting to different modalities of conducting Codex work and more fully engaging members and observers is crucial during the upcoming strategic plan period.
- **High level UN (WHO/FAO) global initiatives:** We see Codex playing a leading role in developing codes of practice or guidance to members for food safety and security topics within the UN global initiatives. Issues such as food loss and waste are major food security issues globally, as well as integrally connected to the safety of the food supply.
- **Health, Fairness and Sustainability:** We agree with the premise that stronger coordination by Codex with other UN efforts on air and water safety are warranted. Also, Codex can help drive global harmonization of food safety risk management via codes of practice in concert with WHO/FAO expert bodies in a more structured way, including expanding capacity with funding for this critical need.

Beyond the key drivers outlined in the Codex Strategic Plan 2026-2031 draft information, we believe the following points are important considerations as to HOW Codex should consider modifying its approaches to conducting work:

- **Codex Budget:** The Codex budget from the WHO/FAO seems to be inadequate to address the future needs related to its mandate on food safety, human health and enabling global trade via harmonized approaches. WHO/FAO needs to prioritize support for an expansion of Codex activities in view of the eight priorities we outlined in answer to the first question.
- **Codex Meetings:** The current approach to Codex operating modalities requires further modification over the strategic plan period to enhance participation of members and observers in the process in order to drive greater inclusivity. In particular we suggest that WHO/FAO enable Codex to use UN regional offices as centralized locations for holding Codex Committee meetings that can facilitate interactive, web-based Codex meetings and also provide consistent travel locations for members and observers, making investment costs for participants more predictable. Additionally, pilot testing and leveraging new technologies to improve proactive interactions and avoid duplicative activities would be beneficial.

