

## International Agri-Food Network Position

# Codex Alimentarius Contribution to Sustainability in Food and Agricultural Production

(March 17, 2023)

### Executive Summary

This document outlines ten considerations for the discussion on Codex Alimentarius contribution to the sustainability of food and agricultural production. The document highlights that Codex has an important role in contributing to sustainability through its mandate of protecting consumer health and ensuring fair practices in food trade enabling food safety, leading to better nutrition, less food waste, and potentially more food security, thus contributing to the United Nations (UN) Sustainable Development Goals (SDGs). However, there are several areas of concern and issues to consider if Codex initiates activity on sustainability in its standard setting work.

This document suggests there be a common understanding of the concept, and that Codex adhere strictly to its mandate of protecting consumer health and ensuring fair practices in food trade. Codex should also maintain a science and risk-based approach to standard-setting and ensure that its standard-setting process remains transparent, reliable, and predictable. Codex must remain neutral, avoiding any bias towards a particular geographic location, climate, commodity, or production system, and should instead enable innovation and growth in the food and agriculture sector, as well as minimizing non-tariff trade barriers.

It also suggests that Codex Member governments should apply sustainability principles consistent with World Trade Organization (WTO) trade rules and obligations, considering that Codex's reference in the WTO Sanitary and Phytosanitary (SPS) Agreement is relevant to the WTO Technical Barriers to Trade (TBT) Agreement. Codex should recognize its scientific role and rely on the scientific risk assessments of the World Health Organization (WHO)/ Food and Agriculture Organization (FAO) expert bodies. Furthermore, it also notes that providing additional scientific expert advice for Codex on issues pertaining to sustainability would have significant resource implications and may be difficult to achieve given the current resource limits. Finally, Codex should seek to gain required expertise from Codex Member States to ensure that it remains well-equipped to deal with emerging issues related to sustainability.

### Introduction

The world is increasingly investing in making food and agricultural production systems more sustainable. Governments, the private sector, civil society, academia, and other stakeholders are already making significant investments, implementing practice changes, supporting research and innovation, and otherwise incentivizing more sustainable food systems. The IAFN Coalition for an Enhanced Codex supports the transition to more sustainable food systems.

In this context, some Codex Members would like to see Codex' role in the sustainability of food production more prominently considered in the standard-setting process.

This document sets out ten considerations to help Codex and its Members to further discuss this matter, with a view to highlight and build on the achievements Codex Alimentarius has made over the past 60 years and enabling Codex is set for the future of the next 60 years.

## Considerations

- 1. Codex contributions to the United Nations (UN) Sustainable Development Goals (SDGs):**  
The Codex Alimentarius is a collection of internationally adopted food standards and related texts presented in a uniform manner. These food standards and related texts aim at protecting consumers' health and ensuring fair practices in the food trade.<sup>1</sup> Codex plays an important role in contributing to sustainability through its mandate by achieving better food safety which means better nutrition, less food waste and can potentially lead to more food security. In turn, better nutrition and more efficient food systems pay strong, lifelong dividends for health, productivity, and economic growth.<sup>2</sup> Codex has already established in its Codex Strategic Plan 2020-2025<sup>3</sup> the multiple ways in which adoption of Codex standards contribute to attainment of the UN SDGs.<sup>4</sup> Codex should be recognized for these existing contributions to the 2030 Sustainable Development Agenda.
- 2. Adhere to the Codex scope and mandate.** Though Codex already contributes to the UN SDGs, there is currently no definition of sustainability in the Codex Procedural Manual or otherwise accepted by Codex. If however, Codex initiates activity on sustainability, there should be a common understanding of the concept and strict adherence to the Codex mandate: protection of consumer health and ensuring fair practices in food trade. Any Codex activities on sustainability would benefit from the consideration of relevant science-based work by other international organizations that could serve as a basis for Codex contributions to protecting consumer health and the facilitation of international trade.
- 3. Maintain science and risk-basis for standard-setting.** Codex standards must be based on relevant sound scientific data. Codex is not resourced to undertake work in emerging areas where scientific data is limited; other international organizations are better equipped to deal with emerging scientific or policy matters. Considering that the linkages between sustainability and food safety are still evolving and relevant scientific data substantiating this link being developed, Codex should consider new food safety-related standardization where agreed scientific evidence is available.
- 4. Safeguard the Codex process.** One of Codex' strengths is its transparent, reliable, and predictable standard-setting process (the "step process"). Codex would need to elaborate ways how it will include sustainability in its standards development and adoption procedures that is consistent with its commitment to science- and risk-based standard setting and its commitment in supporting the 17 SDGs which were agreed with the ambition 'to leave no one behind'.
- 5. Uphold Codex neutrality.** Sustainable approaches and practices differ based on geographic location, climate, commodity, production method, supply chain, eco-services needed, and business-type, etc. Codex is intended to protect public health and ensure fair practices in international food trade irrespective of technologies, practices, products, or production systems. Codex must maintain its neutrality and should in its role as standard setting body enable

<sup>1</sup> <https://www.fao.org/fao-who-codexalimentarius/about-codex/en/>

<sup>2</sup> Contribution to the 2016 High-Level Political Forum on Sustainable Development by the Codex Alimentarius Commission:

<https://sustainabledevelopment.un.org/content/documents/10302CODEX%20Alimentarius%20Commission.pdf>

<sup>3</sup> <https://www.fao.org/3/cb0222en/cb0222en.pdf>

<sup>4</sup> <https://www.fao.org/3/ca5645en/CA5645EN.pdf>

innovation and growth in the food and agriculture sector that are needed to feed a growing population while mitigating climate change and preserving biodiversity and the environment. It has an important role in minimizing non-tariff trade barriers, promoting regional or individual member policies, and providing justification for import or export requirements by member governments if they do not adopt Codex standards.

6. **Adhere to World Trade Organization (WTO) requirements.** Given Codex's reference in the WTO Sanitary and Phytosanitary (SPS) Agreement and its relevance to the WTO Technical Barriers to Trade (TBT) Agreement, Codex Member governments should apply sustainability principles consistent with WTO trade rules and obligations. WTO case law also provides guidance.
7. **Recognize Codex scientific role.** Codex relies on the scientific risk assessments of the World Health Organization (WHO)/ Food and Agriculture Organization (FAO) expert bodies: JECFA, JMPR, JEMRA and JEMNU. These food safety bodies are staffed with experts who attend as independent internationally recognized specialists who act in a personal capacity on a volunteer basis. Those bodies have a defined scope and currently may lack expertise in areas relevant to sustainability. Providing additional scientific expert advice for Codex on issues pertaining to sustainability would have significant resource implications and may be difficult or not attainable given the current resource limits. In addition, Codex should carefully analyze how sustainability activities could impact the Codex Working Principles for Risk Assessment for Application in the Framework of the Codex Alimentarius (especially paragraphs 4 and 10) and the 'Statements of Principle Concerning the Role of Science in the Codex Decision-Making Process and the Extent to Which Other Factors Are Taken Into Account'.
8. **Required expertise from Codex Member States.** Organizationally and in terms of knowledge and scientific input, Codex Member State officials active in Codex usually come from Ministries of Agriculture or Health. Adding a sustainability component into Codex standards requires representatives to rethink the composition of their Codex membership to include additional expertise from other Ministries or Agencies, and the resources they would dedicate to Codex also in view of this topic in other international organizations.
9. **Focus Codex resources.** Codex has very limited resources, a significant existing workload, and a Strategic Plan that addresses agreed upon priorities including the ways in which its standard setting activities support the 2030 Agenda for Sustainable Development. Codex should carefully balance constraints on existing resources and the priorities of on-going and new standard-setting activities alongside the interest in sustainability. For this reason, it is critical that the time and efforts of the Codex Secretariat and committees be allocated based on priorities expressed by Members.
10. **Remain flexible and respectful of product and market diversity.** Codex standards must remain flexible to be applicable to the diversity of products across the supply chain. There should be recognition of the competing demands on the global food supply such as national/regional food security issues, increasing populations, available agricultural production areas, etc.

## How to Move Forward

Codex makes significant contributions to the 2030 Agenda for Sustainable Development through its standard setting work. If sustainability considerations were to be included as part of Codex standard setting process itself, this should be in an open, deliberate, transparent and inclusive way. It should be recognized this would be a fundamental change and expansion of Codex' role and would need to

be considered within the context of Codex' mandate, expertise, procedures, structure, resources and by consensus of its Members.

This debate may be politically sensitive. Adding new topics that are currently beyond its mandate could undermine Codex' credibility, potentially compromise its values, and strain the organization's limited financial and human resources. Holistic, inclusive and global discussions would be necessary before there are attempts to include sustainability considerations in Codex standards in a piecemeal manner in technical committees.

If there is continued interest from Codex Members to further explore, the Codex Alimentarius Commission (CAC) should convene an organized discussion to determine whether consensus can be achieved amongst Members to include sustainability factors in Codex. This discussion should be based on a balanced pre-prepared analysis, that addresses technical, legal, scientific, feasibility and political considerations. In line with its inclusiveness policy, all Codex Members and Observers should have opportunities to participate in these deliberations. Thereafter it will be for the Codex Members to decide if, how and under what conditions it wants to move forward.

**About IAFN:** The IAFN Coalition for an Enhanced Codex represents farmer and industry associations across the agri-food chain. Members represent agricultural input industries such as suppliers of seeds, fertilizers, crop protection, animal health, feed and biotechnology-based products, traders, farmers, and the food and drink manufacturing sector. Our mission is to help provide enough safe, healthy, high-quality and diverse food at affordable prices to consumers in an economically, environmentally and socially sustainable way. In doing so, we contribute to increased food safety, food security, better nutrition and health, economic growth and development, and poverty reduction. The Coalition is part of the IAFN network ([www.agrifood.net](http://www.agrifood.net)).