

Codex Contact Point for Australia / CCFICS Secretariat

18 March 2024

Dear Gillian Duffy and Meg Ryan,

Thank you for the opportunity to provide comments on the revised draft approach and criteria for evaluation and prioritization of the work of CCFL.

A&AA supports the changes, but we have feedback on point 11:

11. The proposed work should be assessed against the criteria as per the ratings given for each criterion. New work proposals will ultimately be prioritized as per the overall rating received through this prioritization process. Additional criteria, such as feasibility of the proposed new work, may be necessary and developed later for application while considering two or more items of similar priority.

We acknowledge that comments were raised regarding a numerical value rating scale, but not incorporated into the draft. We would like to understand why a numerical value rating scale was not accepted for the process of prioritisation of proposals.

We suggest a numerical value rating scale should be utilised as this will allow for a clear comparison to be made between similarly rated work proposals. The proposed rating system that includes high/medium and low ratings does not allow for a direct comparison to be made. For example, if a work proposal has 2 high and 2 medium ratings for each of the criteria, is the overall rating high or medium? How does the first criteria get incorporated when the rating is different (yes/no/partially) compared to rating system for the other criteria (high/medium/low)? For example, does 'yes' equate to high, 'partially' equate to medium and 'no' equate to low or is this assessed independent of the other criteria?

We believe that the revised guideline is ready to be used on a trial basis if there is a system in place for a numerical value rating scale.