

Committee on Sanitary and Phytosanitary Measures

**PRIVATE STANDARDS - IDENTIFYING PRACTICAL ACTIONS
FOR THE SPS COMMITTEE – SUMMARY OF RESPONSES**

Note by the Secretariat¹

INTRODUCTION

1. On 5 July 2008, the Chairman of the SPS Committee circulated a number of questions for the attention of Members to solicit proposals regarding what the SPS Committee can and should do to (1) reduce the negative effects that private SPS standards have on international trade, especially for developing countries, and to (2) enhance the potential benefits arising from private SPS standards for developing countries (.JOB(08)/58). Responses were received from 30 Members; these have been compiled and are contained in JOB(08)/97.
2. A brief summary of the responses received is given below for each of the questions. Specific suggestions regarding concrete actions by the SPS Committee have been highlighted, where these were submitted by Members. Finally, this document contains a proposal for further actions by the Committee, based on the responses from Members.
3. To avoid possible confusion, in this document the use of the term "international standard" refers exclusively to the standards, guidelines or recommendations developed by the Codex, IPPC or OIE. The term "national" requirement refers to governmental requirements.

SUMMARY OF RESPONSES

1. *Should the SPS Committee limit the focus of its work to certain categories of private SPS standards? If so, to only collective international schemes (e.g., GlobalGAP, ISO 22000, Global Food Safety Initiative); or also collective national schemes (e.g., British Retail Consortium (BRC) Global Standard, Assured Food Standards); or also individual firm schemes (e.g., Tesco Nature's Choice, Carrrefour Filière Qualité)? (Document G/SPS/GEN/746 provides a useful description and categorization of different types of private standards.)*

Virtually all of the respondents to this question suggested that the Committee should consider all of these categories of private standards, as all could have significant effects on trade. A few Members, however, suggested that the Committee should either exclusively, or at least initially, focus on collective international schemes.

¹ This document has been prepared under the Secretariat's own responsibility and is without prejudice to the positions of Members or to their rights or obligations under the WTO.

2. *Would it be useful to the SPS Committee to have a study which compares private standards with corresponding Codex, IPPC and OIE standards?*

While most respondents supported a study, several suggested that it was premature, and that the Committee should first focus its efforts on clearly identifying the problems related to private standards.

If this would be useful,

(a) Which types of private standards should be included in the study: only collective international schemes; or also collective national schemes; or also individual firm schemes? Which ones?

Most Members suggested that there should be no a priori exclusion of any category of private standard, although some suggested that priority should be given to examination of collective international schemes. One Member suggested that attention should focus primarily on the standards of GlobalGAP, BRC, Tesco, SQF, and Global Food Safety Initiative (GFSI); while another specifically identified also ISO 22000 and ISO 22005.

One suggestion on how to identify which private standards would be considered was to base the study on specific products and specific private standards, identified by Members, whose trade is affected by private standards. This would permit a very focussed study which compared an identified private standard with the relevant Codex, OIE or IPPC standard for the same product, as exported by Member X to Member Y.

(b) Should all three sister standards be included in the study? If not, which ones?

Most respondents indicated that Codex, IPPC and OIE standards should all be included, however some suggested that Codex standards were of most relevance in this regard. One Member suggested that the three organizations should decide whether they wished to participate in this study.

(c) How can such a study be done quickly, in a practical way?

Some respondents suggested that private consultants could be engaged to do this study, or other international organizations (i.e., FAO, IICA, UNCTAD, World Bank), or that the Codex, IPPC and OIE secretariats could be requested to undertake such a study in their respective fields of work; or an ad hoc group of Members could work together; or that the work be undertaken by Members working at the regional level. Several Members stressed that clear terms of reference for the study were critical before any work was undertaken. Some very specific proposals for structuring a study were submitted.

One proposal was a 3-stage approach. In the first stage, Members would be invited to each identify one product of export interest whose trade is affected by private standards. For this product the Member should provide (1) a description of the relevant private standard(s) which are applied in each of its export markets; (2) the relevant international standard(s); (3) information on the positive and/or negative effects of the private standard(s) (including, to the extent possible, data on trade, costs of compliance with the standard(s), identification/categorization of businesses that meet the international standard (eg, small, medium or large, national, foreign or multi-national), benefits obtained from compliance with the private standard(s), etc); and (4) identification, to the extent possible, of the relevant SPS provisions.

As the second phase, a working group of the SPS Committee would undertake a descriptive comparative study, followed by an analytical study. The information from Members would be compiled in a matrix which would permit identification of the products most affected; the private standards most frequently identified; the costs and benefits of compliance with private standards; differences and similarities between the private standards and the international standards; level of compliance of the private standard with the SPS Agreement provisions; whether the private standards facilitate implementation of the international standard. The descriptive matrix and Member's comments on it would provide the input for an analytical study by the working group focussed on whether the private standards create trade difficulties; the nature of any such difficulties; the most relevant SPS disciplines; the role of Codex, IPPC and OIE; etc. Finally, in the third phase the working group would propose concrete actions for consideration by the SPS Committee based on the above study and the comments of Members.

Another suggestion was that the SPS Committee work with the FAO on a questionnaire which identifies the standards relevant for trade, categorizes these as international or private standards; identifies who developed the standard and who certifies compliance with the standard; indicates which commodities are affected and in which country it is applied, etc. The responses to this questionnaire could be used to identify those private standard schemes which have the greatest impacts on trade, the entities involved and the scope of the impact on trade; subsequently strategies to address the effects could be developed.

A third specific suggestion was to invite the private standards bodies to submit information on their existing standards, processes of developing standards, transparency, equivalence, scientific justification, etc. On the basis of this information, the Codex, IPPC and OIE could be invited to identify similarities and deviations from their relevant standards. This would provide a basis for the SPS Committee to develop guidance aimed at bringing private standards into compliance with the principles of the SPS Agreement.

(d) What elements should a study focus on (i.e. transparency, equivalence, scientific justification, development)?

Most respondents identified the issues of transparency and scientific justification as most important, while others included also equivalence, harmonization and technical assistance. One suggestion was to focus on how private standards are implemented by private operators, identifying the problem areas in this regard. There were also suggestions that the study clarify how private standards can contribute to and facilitate trade and development. Some Members considered it necessary to first have clarity regarding the legal relationship between private standards and the WTO agreements before any study were undertaken.

One specific suggestion was to focus the study on: defining to what extent private standard are scientifically justified; identifying a set of solutions that could be used to balance the relation between the consumer rights to consume high quality goods and the rights of the producer/exporters; defining the rules that could be followed to avoid duplication and overlap between the private and official standards in one country; identifying the role of the importing/exporting countries; identifying differences among different private standards schemes and the frequency with which standards are modified; clarifying the role of developing countries in the process of setting private

standards; identifying how to increase the ability of developing countries to comply with such standards.

The costs of third party certification, especially in case of small enterprises and farmers in developing countries, and the requirements to use specified certification bodies were suggested as focuses for the study, along with the recognition of certificates issued by developing countries. It was further suggested that the study could cover also food hazards (identification, risk analysis, communication mechanisms) in domestic and international supply chains, traceability systems.

(e) Who would cover the costs of the study?

A number of respondents noted that if the study is undertaken based on information provided by Members, there would not be any specific costs. Others suggested that a study could be funded by the STDF, FAO, UNCTAD, World Bank or other international bodies. A few suggested that WTO Members could finance the study directly, or that funding could be sought from the private standard setting bodies.

(f) If the results of the study showed that in some specific cases private standards requirements exceed the international standards, what actions could the SPS Committee take?

Several specific actions were proposed in response to this question. It was suggested that such results should be immediately published to ensure that not only the private standard-setting bodies but the public at large was made aware of the conclusions. Other suggestions included:

- analyzing the rationale and justification for such discrepancies and whether there was any discriminatory element (e.g. if the private standards apply only on the basis of country of origin);
- determining whether there was any corresponding price compensation or whether the higher standards created an additional market opportunity;
- developing guidelines to governments regarding vigilance and control over private standards;
- meetings with the private standard-setting bodies;
- workshops with competent government authorities, consumer organizations and other relevant stakeholders;
- assistance to developing countries to comply with private standards; and
- requesting scientific justification of the private standard-setting bodies.

(g) If the results of the study showed that private standards requirements did not exceed the international standards, what actions could the SPS Committee take?

Many respondents indicated that in this case it would be important to ensure greater transparency and harmonization in private standards, and to develop mechanisms to provide information and greater involvement by developing countries in the creation of private standards, and technical assistance to comply with these.

3. *Should the Committee organize periodic information sessions to which specific private standards-setting bodies are invited for the purpose of informing these bodies of Members' concerns and learning about relevant developments? If so, how frequently should such information sessions be scheduled? Which private standards-setting bodies should be invited?*

There was strong support for the organization of periodic information sessions with the private standards-setting bodies. Some suggested that this should be ad hoc, based on the identification of specific issues for discussion, whereas others suggested at least once a year or even at each meeting of the Committee. Among the private standards-setting bodies to be invited GlobalGAP, GFSI, SQF, BRC, Tesco Natures Choice, ISO CASCO, Bureau Veritas, SGS, Intertek and Loyallds were specifically identified.

However, some Members were opposed to these meetings, indicating that efforts should be concentrated rather on a working group, or that it was more important to meet regularly with Codex, IPPC and OIE, or with development agencies and others doing work in this area. One Member stressed that the private standard-setting bodies should channel their communications through their respective national government authorities, not directly to the SPS Committee.

4. *Should the SPS Committee invite the TBT Committee to jointly organize meetings and/or information sessions regarding private standards? What should be the agenda of such meetings?*

Members were split in their responses to this question, with almost half indicating that joint meetings with the TBT Committee would not be appropriate, at least not at the initial stages of the SPS Committee's work.

Those Members who thought it would be useful to organize joint meetings with the TBT Committee made various suggestions regarding possible agenda items, including:

- **Specific trade concerns of Members;**
- **Mechanisms for the application of private standards by developing countries, and in particular problems with certifications systems;**
- **Participation of Members in the development of private standards;**
- **Reports of the Codex, IPPC and OIE regarding the work with private standards-setting bodies.**
- **Good practices, mutual recognition and transparency, and conformity assessment;**
- **The mandatory nature conferred on private standards by the market;**
- **Application and binding force of the SPS and TBT Agreements with regard to the establishment of measures likely to constitute a restriction on trade, private standards as unnecessary technical barriers to trade;**
- **Monitoring of the implementation of the SPS and TBT Agreements by Members in relation to private standards;**
- **Measuring "Certified once accepted everywhere; current standards and benchmarking; lack of equivalence among private standards;**
- **Government support for private standard implementation (certain countries cannot afford this, it is putting them at a disadvantage);**
- **Feasibility of using private standards as the basis for the development of sanitary and phytosanitary measures and technical regulations;**
- **Copyright implications of using private standards in the development of sanitary and phytosanitary measures and technical regulations;**

- Possible mechanisms which could be used by the WTO to ensure that private standards abide by the provisions of the SPS and TBT Agreements;
- Possible role of governments as it pertains to the elaboration of these standards;
- Possible mechanisms that could be utilized to address challenges
- New standards and level of compliance;
- The role of IAF and accreditation bodies.

5. *Does the TBT Code of Good Practice address the concerns relating to private SPS standards? If not, why not?*

Most Members did not consider that the TBT Code of Good Practice would be useful as it was essentially applicable to governmental or quasi-governmental standardization bodies, not to private bodies. Some noted, however, that it would be useful if private standard-setting bodies adhered to the basic principles of the TBT Code of Good Practice, in particular with regard to transparency, participation of developing countries, impartiality and consensus, effectiveness and relevance, coherence, and the development dimension.

6. *Should the SPS Committee encourage other bodies within or outside of the WTO to pursue the issue of private standards and their effects on trade? If so, which other bodies?*

Many respondents considered it unnecessary for the SPS Committee to encourage other bodies to pursue the issue of private standards and their effects on trade, as several were already doing so. They suggested that it would be useful to invite these organizations to report on their work relating to private standards if relevant to the Committee. Several Members noted that this could be done through the regular agenda of the SPS Committee meetings. In contrast, some respondents suggested that other bodies were better placed to pursue this issue and should be encouraged to do so.

In addition to the WTO TBT, Trade and Environment and Trade and Development Committees, Codex, IPPC and OIE, respondents identified as other relevant bodies: COMMARK, FAO (including regional committees), IICA, ISO, ITC, OECD, SADC, SACU, UNCTAD, UNIDO and the World Bank.

7. *How should the SPS Committee coordinate on this issue with the Codex, IPPC and OIE?*

Most respondents suggested that the Codex, IPPC and OIE should be invited to participate in any work on this issue by the SPS Committee, although some suggested this would be more appropriate at a later stage, or that the current agenda of the SPS Committee provided ample opportunity for input from these three sister organizations.

Some specific suggestions were submitted, including:

- The question of how or whether compliance with SPS-related private standards could facilitate compliance with relevant international standards, and the identification of precise actions to ensure compliance, could be raised with the three sisters and other relevant bodies;
- The three sister organizations should be advised to send observers to relevant private standard-setting bodies;
- Devise strategies and joint work plans to develop projects at national and regional levels which allow for the participation of the private standard-setting sector;

- **The three sisters should conduct a retrospective analysis of the development of private standards and their present role, and present their conclusions to the SPS Committee.**

(a) To what extent has the issue of private standards been considered by these organizations?

Many respondents suggested that Codex, IPPC and OIE should be invited to respond to this question, however a number of Members noted that the issue had been addressed by the Commission on Phytosanitary Measures at its annual meeting in April 2008, and by the OIE General Assembly in May 2008. The Codex Commission had entrusted the FAO with a study on the issue, to be presented at the next Commission meeting in June 2009.

(b) Have they undertaken (are they considering) studies regarding the differences between their standards and private standards?

It was apparent from all replies that none of the organizations has to date undertaken a study comparing their respective standards with private standards. However, some suggested that this would be included in the study to be undertaken by the FAO for consideration by the Codex Commission.

(c) What are practical steps that can be taken (or are being taken) to avoid conflicts between the standards of the three sisters and private standards?

Specific suggestions included:

- **Information exchange and outreach between these organizations to improve coherence in the standard-setting universe;**
- **Inclusion of private standards bodies as observers in the standard-setting procedures of the three sisters;**
- **Joint meetings, information exchange and the publication of all draft private standards by private standard schemes;**
- **Harmonization of the standards of the three sister organizations with private standards, in particular with ISO/IEC standards;**
- **Increased dialogue between official regulators and private standard-setting organizations;**
- **Improved compliance of exports with official standards, including in particular the standards of the "three sisters", which could possibly reduce pressure for additional measures going beyond the latter standards;**
- **Development of individual or a collective position paper on private standards by the Codex, IPPC and OIE for endorsement by their members and the WTO/SPS Committee;**
- **Training and information on the market requirements for access to markets;**
- **Improved communication with all stakeholders including IAF, ISO CASCO, etc.;**
- **Ensuring a better understanding of the role of each group and what conformity assessment is all about**
- **Further a better understanding regarding the role and impact of accreditation bodies and the IAF.**

(d) To what extent could private standards be used to facilitate compliance with the international standards?

Whereas some respondents were categorical that private standards could not facilitate compliance with international standards, others suggested that this was perhaps what private standards were attempting to do, through the development of good practices. Some specific suggestion for the use of private standards to facilitate compliance with Codex, IPPC and OIE standards included:

- Ensuring that private standards, whilst respecting SPS principles, strengthened Members' export capabilities, thereby facilitating compliance with international standards;
- Ensuring that private standards are developed in accordance with the guidelines established by the three sisters and national government authorities, so that private and international standards dovetailed, whilst catering for the needs of each region and facilitating the creation of mechanisms for monitoring the implementation of such standards at regional and international level;
- Ensuring that the private standard adoption process followed the procedures established by the international organizations;
- Using private standards as a model to improve official national standards (for example, with regard to better food safety control practices and agricultural quality assurance procedures);
- Compliance with private codes for agricultural good practices, manufacturing good practices, laboratory analysis and rules setting can be a stepping stone to comply with the international standards established by governments;
- Private standards can provide economic incentives for producers to ensure compliance with standards, irrespective of whether they are private or international;
- If certification of compliance with a private standard (i.e., GlobalGAP) means that a farmer does not have to be inspected by government for compliance to similar official standards, particularly if all retailers (including local ones) agree to accept the main standards and not require compliance to additional ones.

(e) To what extent do the three sisters identify precise actions to be taken to comply with their standards (GAP, GMP, Good Aquaculture Practices, etc.)?

Respondents noted that the three sisters, within the limitations of their resources, increasingly provide important and invaluable guidance on the necessary measures to allow trade in food to take place under safe conditions. This includes developing standards that include GMP and GAP. However, it was also stressed that the Codex, IPPC and OIE are only concerned with developing, not monitoring compliance with, international standards.

8. *Should the SPS Committee coordinate on this issue with other international intergovernmental organizations, e.g., UNCTAD, World Bank, OECD, ITC?*

Some respondents suggested that it would be useful to coordinate with other organizations to get information on what they are doing, and some noted that this could be done under existing agenda items at meetings of the SPS Committee. Other respondents suggested it was premature to coordinate with the work of other bodies at this time.

(a) *To what extent has the issue of private standards been considered by these organizations?*

As one respondent succinctly stated, most of the studies undertaken by these organizations analyze the positive and negative aspects of private standards on the basis of case studies. They do not, however, analyze consistency of the private standards with SPS principles or with the international reference standards. Neither, as a general rule, do they suggest courses of action aimed at preventing private standards from becoming unjustified barriers to international trade

9. *To what extent could private standards facilitate compliance with official SPS requirements (national requirements and/or the international standards)? Can you give specific examples of where this has occurred / is occurring?*

There were significant differences in responses to this question. A number of Members replied that there was no evidence that private standards contributed to the compliance of official SPS requirements, and it was noted that most private standards did not correctly address SPS issues. It was noted that the main objective of private standards was as a means of differentiating these products from products that simply meet national and/or international standards. A number of respondents also stressed that often private requirements exceeded the national ones and exporters from developing countries had to incur very high costs, which generally resulted in market exit or a lack of incentive to penetrate markets.

In contrast, some respondents noted that protocols of good agricultural practices, such as GlobalGAP, adhered to and, to a certain extent, facilitated compliance with official requirements. More generally, where private standards had a sound scientific basis and promoted best practices consistent with SPS principles and national requirements, there was likely to be significant facilitation of compliance with SPS requirements. It was also observed that compliance with official standards did not guarantee market access. To find customers, it was necessary to meet the requirements of the market, and private standards could create a bridge between the essential step of meeting official standards and finding customers.

10. *Should the SPS Committee eventually pursue a legal analysis of the relationship between the SPS Agreement and private standards?*

Many respondents considered that a legal analysis would be useful, and some described it as essential. Others, however, suggested that engaging in such analysis was unlikely to yield a result that could be endorsed on a consensus basis and at the same time provide clarity and direction for Members. They suggested that the Committee should look instead at practical actions that might assist Members who face specific problems.

(a) *If so, how would this analysis be undertaken?*

Suggestions from Members who supported a legal analysis included:

- Requesting a legal team of advisers from the WTO to write in plain language an opinion on the interpretation of the Agreement and where the authority lies for the introduction of measures which regulate trade between partners;
- Forwarding the issue for a ruling by the WTO tribunal;
- Consulting external legal experts with experience on such matters;

- **Having the analysis conducted by an ad hoc working group, made up of Members, working within a reasonable period of time and in accordance with very precise terms of reference;**
- **Having Members commission their own independent studies on the issue;**
- **Basing the analysis on the main concerns and/or complaints concerning private standards received both by the SPS Committee and by the Codex, IPPC and OIE. It must also assess whether or not these standards comply with the provisions of the SPS Agreement and, if this is not the case, indicate how to proceed in order to achieve compliance;**
- **Seeking STDF funding for a project interpreting Article 13 of the SPS Agreement and analyzing its scope in terms of government responsibilities and authority in relation to private standards, in particular those which cause unjustified barriers to trade;**
- **Ensuring the analysis was not limited to the SPS Agreement but included other WTO agreements as well.**

(b) What would be its form?

Most respondents in favour of a legal analysis suggested that it should take the form of a report to the SPS Committee, with one suggestion that the analysis should propose amendments as necessary to the texts of both the SPS and TBT Agreements.

(c) What issues would this analysis examine that were not included in the analysis by Gascoine and O'Connor and company (see G/SPS/GEN/802)?

A number of Members suggested that this document would be useful input and noted that the document itself suggested the need for further legal analysis. In particular, the section on "Legal options and possible suggestions, or courses of action, to address the issue of private standards and the position of non-governmental bodies' standards within the WTO system" included some suggestions on how both the SPS and TBT Committees could handle the issue of private standards.

One respondent, however, noted that the study had been commissioned by a developed country Member and was not balanced as it ruled out different possibilities for assessing private standards in the light of the SPS and TBT Agreements. Moreover, the study did not take account of the participation of developing countries as partners or of the role that such countries could have in the assessment of private standards.

RECOMMENDATION FOR ACTIONS BY THE SPS COMMITTEE

4. As the summary above makes apparent, there is a wide range of views held by Members regarding the issue of private standards, the extent to which they establish SPS requirements, their effects on trade and development, and their legal relationship with the SPS Agreement.

5. There is also, however, much interest, in particular on the part of developing country Members, for the SPS Committee to begin to address this issue in a practical manner. The large number of respondents who favoured undertaking a study which compares relevant private standards with the corresponding Codex, IPPC or OIE standards is a clear indication of the desire for the Committee to take some concrete steps on this matter. Some very useful, practical suggestions for such a study were made in response to Question 2(c), as noted above.

6. It is therefore recommended that the SPS Committee address the issue of private standards through a multi-track approach. Most of this work could be undertaken by a group of interested

Members, reporting to each meeting of the SPS Committee. The proposed actions would be as follows:

- (a) Members and Observer Organizations would be encouraged to provide any relevant information regarding studies or analysis which they have undertaken or of which they are aware for consideration by the group of interested Members. Of particular interest in this regard would be the study being undertaken by FAO with respect to food safety standards. Representatives of the Codex, IPPC and OIE, as well as of any other appropriate organizations, may be invited to meetings of the group of interested Members;
- (b) The group of interested Members could periodically request the Secretariat to organize informal information sessions with appropriate representatives of bodies involved in the setting of private standards, assessment of conformity, or assistance with compliance with private standards; and
- (c) The group of interested Members could undertake a comparative study, in three phases, similar to that summarized above in response to Question 2(c) (suggested by Argentina). These phases would be as follows:

Phase 1: Each interested Member would be invited to identify one or two products of export interest whose trade is affected by private standards. For this product the Member should provide:

- (i) a description of the relevant private standard(s) which are applied in each of its export markets;
- (ii) the relevant Codex, IPPC or OIE standards) for that same product;
- (iii) information on the positive and/or negative effects of the private standard(s), including, to the extent possible:
 - data on trade,
 - costs of compliance with the standard(s),
 - information on recognition of compliance with the standard(s);
 - identification/categorization of businesses that meet the private standard(s) (e.g., small, medium or large, national, foreign or multi-national);
 - any technical or financial assistance received to assist compliance with the private standard(s); and
 - benefits obtained from compliance with the private standard(s).
- (iv) identification, to the extent possible, of any provisions of the SPS Agreement that are relevant with regard to the difficulties arising from the requirements established by the private standard(s).

The Secretariat could develop a format for the use of Members in providing the above information, to ensure some consistency and comparability of the information provided and to facilitate its consideration by the Committee.

Phase 2: The Secretariat, with the assistance of interested Members, would compile the information provided by Members into a descriptive matrix. This should permit the group of interested Members to prepare a descriptive report, which would include:

- (i) the identification of the products whose trade is most affected by private standards;
- (ii) identification of the markets where trade is most affected by private standards;
- (iii) the private standards most frequently identified;
- (iv) the costs of compliance with private standards;
- (v) the benefits of compliance with private standards;
- (vi) technical / financial assistance provided;
- (vii) differences and similarities between the private standards and the international standards;
- (viii) whether the private standards facilitate implementation of the relevant international standards; and
- (ix) the provisions of the SPS Agreement most frequently identified....

Phase 3: On the basis of the descriptive report, and other relevant input, the group of interested Members could prepare an analytical report for consideration by the SPS Committee. The report would address, inter alia, to what extent private standards create trade difficulties; the nature of any such difficulties; the most relevant SPS disciplines; the role of Codex, IPPC and OIE; etc. This report should also propose concrete actions for consideration by the SPS Committee based on the above study and the comments of Members.

7. With regard to timing, it is recommended that the various phases identified above be scheduled to correspond with meetings of the SPS Committee. That is, if the Committee were to agree to this recommendation at its meeting in October 2008, Members would be invited to submit information as requested in Phase I by the time of the Committee's meeting of 24-26 February 2009. The descriptive report would be prepared for presentation to the Committee at its meeting of 23-25 June 2009, and the analytical report with recommendations could be presented for consideration by the Committee at its meeting of 13-15 October 2009.
