

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 4

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION
AND CERTIFICATION SYSTEMS**

Twelfth Session

Brisbane, Australia, 1 – 5 December 2003

**DISCUSSION PAPER ON TRACEABILITY/PRODUCT TRACING IN THE CONTEXT OF FOOD
IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS**

**Comments from Argentina, Canada, Mexico, New Zealand, United States, Consumers International
(CI), EuropaBio and International Life Sciences Institute (ILSI)**

ARGENTINA

Argentina thanks CCFICS for the possibility of making observations on the document compiled during the meeting of the CCFICS Working Group on Traceability, held in Fribourg, under the Chairmanship of Switzerland, from 3 to 5 September 2003.

Further, it would like to congratulate the Chairmanship of Switzerland for the “Draft Discussion Paper” that was discussed at the WG’s second meeting.

BACKGROUND:

Sanitary and phytosanitary measures (SPS) as well as those under the TBT Agreement, are in practice restrictive trade measures.

Many of these restrictive trade measures are justified in the light of WTO agreements.

At times, it is necessary to harmonise these measures at a bilateral, regional or multilateral level, with a view to determining common criteria for their application. At other times, WTO member countries decide to adopt consultative measures, as established under the WTO Agreement on settling disputes, when they consider that the measures applied to their export products are contrary to the terms of WTO agreements.

The Codex Alimentarius is the competent entity established for the SPS Agreement, in terms of food safety, as the standards it establishes are considered consistent with the WTO Agreements, notably Article XX of the 1994 GATT.

Without this international harmonisation made through the Codex Alimentarius, it is possible that many of the measures adopted by the Codex Members at the national level would be contrary to the provision of the texts covered by the WTO, and consequently actionable through the dispute Settlement procedure, when a Member State of this organisation considers that the trade in its agrifood products is being restricted arbitrarily or unjustifiably.

In light of the above, Argentina considers that the negotiations held under Codex are not to “legalise” certain national restrictions applied by some countries, but rather to regulate aspects regarding the protection of consumers’ health relative to food safety, dealing with other issues when due scientific and technical justification exists.

Finally, it is important to remember that the FAO and the WHO actively worked during the negotiations for the WTO's Agreement on the Application of Sanitary and Phytosanitary Measures (SPS), and that many of the provisions established in that agreement were the result, among others, of the cumulative experience of the FAO/WHO through negotiations concluded under the Codex Alimentarius, enabling them to understand the nature of the food trade barriers to which their Members are subject.

Such that the Codex Alimentarius is an international organisation of the FAO/WHO designed to draw up standards aimed at achieving the Codex's aims, and so it should be clear that such standards are applicable at the national level as well as at the level of Codex Members' international food trade. As a consequence, the link with the WTO Agreements should be borne in mind, as certain members claim to suggest.

Having made these general comments, Argentina would like to make some specific comments about the working procedure adopted by the Chairmanship of the CCFICS Working Group that met in Fribourg last September, and then several observations about the text circulated among Codex Members for comments.

Fribourg Meeting: working procedure adopted by the Group Chairmanship

Sixty delegations attended the meeting of the Working Group on Traceability, of which only four were from developing nations, of these four developing nations only two attended with two delegates per country. This limited representation of developing nations is not attributable to a lack of interest in the discussion of a topic that will undoubtedly affect everyone, but rather to a lack of available resources to cope with the increasingly extensive agenda of Codex meetings.

We must also mention the appeals made during the course of the meeting by Argentina and other countries regarding the lack of the Chairmanship's availability for listening to all the opinions and for enabling the participants to speak on each of the points in the document.

Further, the working method adopted by the Chairmanship did not allow for the full participation of the delegations in all the Committee's work, given that instead of taking decisions in the plenary meeting, the analysis of options in the traceability working group was made by subdividing the latter into five groups of those present.

By virtue of which, the delegations from developing nations, who made enormous efforts to attend the meeting, were not able to participate fully in the work, and make their comments known to the various sub-groups, as they did not have sufficient delegates. Later, we returned to work in a plenary session, but the participants were not given the right to make objections to the conclusions reached by each sub-working group.

COMMENTS ON THE REPORT

1. Argentina would like to reiterate what it said at the last meeting and in other Codex fora regarding the fact that there is still no definition of traceability, and that understandings of it manifestly differ.
2. As we have mentioned on numerous occasions, in our understanding, traceability is not an end in itself, but rather a tool which, in certain circumstances, may be necessary to guarantee effective protection when other methods to achieve this protection either do not exist or are not available.

We thus reject the underlying idea of applying a traceability system with the aim of guaranteeing the authenticity of the information on export certificates, as this is tantamount to saying there is trust in the national entities responsible for this certification. In this case, it is obvious that instead of "attacking the source of the disease (the effectiveness of the inspection authorities), it is sought to minimise its effects (shortcomings in the product inspection and certification system)", and we do not believe that this is the right direction.

Nor can we say, in this case, that this represents an additional problem for developing nations, because that would presuppose that such problems in inspection authorities are the preserve of developing nations, when in fact recent history has shown that developed nations also experience food crises.

In light of the above, we reiterate the comments of paragraph 18 of the report, in stating that most of the texts examined would not achieve the objectives more adequately if they were to include or emphasise the elements of product traceability found in most of the texts analysed.

With respect to paragraph 22, we believe that the Executive Committee has made other contributions with regard to the subject that are more relevant to the extent to which traceability should apply in terms of the WTO's provisions.

The question is not only to identify safety or other legitimate objectives to justify the use of traceability, but rather the adoption of certain measures that should comply with the WTO agreements (notably the SPS and TBT Agreements).

With regard to the opinions raised, Argentina considers that all future work should be suspended until such time that a clear definition has been made of what is understood by traceability and in what circumstances its application would be possible as a mandatory measure justified under the terms of WTO agreements. In light of this, our option in this instance is i.e., despite the disadvantages the sub-group pointed out in the document.

With regard to the above, we would like to point out that:

1. Traceability may be an important topic, but its scope must be clearly defined if it is not to become an unjustified and arbitrary restriction on international food trade.
2. This option is consistent insofar as the Codex cannot work in a disjointed fashion, so the solution is to begin by the definition and its scope.
3. The progress will in fact be the consistency with which the topic is clarified and advanced.
4. It is certain that at present certain national systems have adopted specific measures regarding traceability. This should not be the central reason for acting in haste. It is one thing to harmonise and another to try to legalise measures in a questionable manner in international organisations, especially when such measures may disproportionately change product inspection requirements.
5. We do not believe that the opinion of countries and consumers would be a disadvantage, since the opinions are not unanimous, as has been apparent in many Codex meetings and documents.
6. We do not believe that the adoption of measures in this way will prevent food crises from continuing to exist, as traceability has been shown to be a tool and not a guarantee in itself. Further, if traceability is a management tool, then it is certain that other tools can guarantee the same food safety objectives that are defended here.

Finally, we consider it appropriate to hold workshops on a variety of concrete cases, bearing in mind the implementation costs for different products in developed and developing nations.

CANADA

Canada expresses its thanks to the Working Group on Traceability / Product Tracing under the Chairmanship of Switzerland for the elaboration of the above mentioned Discussion Paper. Canada would like to offer the following observations and comments:

General Comment:

Canada notes that the report is a reflection of the discussion that occurred at the Working Group meeting in Switzerland, including the Analysis of CCFICS text reported in Appendix I.

Paragraph 11:

Canada would like to emphasize the concept expressed in Paragraph 11 of the report that Traceability / Product Tracing is a tool which, when used in a broader food control system, may assist countries to meet safety and/or quality objectives. Traceability / product tracing is not an objective in itself. It may assist countries to demonstrate that foods meet quality or safety requirements only through facilitating access to other information which relates to the product and which was generated as a requirement of a food control system.

Paragraph 22:

Canada notes the conclusion made by some delegations in Paragraph 22 regarding the degree to which traceability / product tracing would be developed to enable “relevant information to accompany the products in order to ensure the accuracy of the certification with respect to the fact that the product met food safety standards and/or technical requirements”. It is Canada’s position that it is not appropriate and seldom practical for relevant information related to safety or technical requirements to accompany a product along the entire food chain. Rather, traceability/ product tracing will enable appropriate access to such data and the accessed data may then be used to ensure accuracy of the certification.

Paragraph 32:

With respect to the recommendation in Paragraph 32, Canada notes that the options laid out in the List of Options Table with their advantages and disadvantages were not consensual, hence accuracy and completeness cannot be assumed.

Canada would like to indicate its preference for Option 3A, i.e., Develop a new horizontal document containing “principles for the application of traceability / product tracing” within CCFICS, noting that these principles would be applied in the context of food import and export inspection and certification systems. It is Canada’s opinion that only after the elaboration of such principles would CCFICS be in a position to establish whether there is a need for the development of further guidance. It would also be appropriate, subsequent to the development of the principles, to consider the desirability of incorporating them into existing CCFICS text, e.g., CAC/GL 20-1995 - “Principles for Food Import and Export Inspection and Certification”, as per option 2B.

Paragraph 33:

Canada fully supports the intent of the recommendation in Paragraph 33 and believes that, should CCFICS undertake the development of principles related to traceability / product tracing, this would provide an excellent opportunity for such discussion.

Paragraph 34:

Canada would like to note that particular attention should be given to the work of the Codex Committee on General Principles in the development of a definition on traceability / product tracing.

MEXICO

Mexico would like to highlight the work by the Working Group on traceability/product tracing in placing on the table a very complete analysis of the topic of traceability in the existing CCFICS texts, and present a series of options to the Committee.

Traceability has been widely discussed in various Codex Committees and it is considered that there are elements that must be given in the form of principles or directives for a better understanding of the topic. The risk in not continuing to work on this topic is that traceability start being used without defined limits, and this may potentially affect international food trade. In this respect, the option of not continuing with this work in CCFICS is not considered appropriate.

The option of revising specific texts is thus attractive, although the comments by the Working Group must be taken into account, namely that the objective of each of the documents is appropriately covered.

Additionally, the aspects of traceability that may be expressly incorporated in CCFICS texts would have to be limited to a simple reference, as a full development of the topic would be excessive in terms of the actual documents’ objectives, noting also that a simple reference to traceability is not sufficient to direct governments to the practical scope, cover and application.

The development of a new document or documents is, therefore, a more appropriate option for considering the topic specifically within the context of CCFICS. However, the Committee is confronted with the lack of a definition and clarity with regard to the scope and coverage that needs to be given to traceability within the context of Codex.

In this respect, it is considered appropriate to wait for the proposals of the Committee on General Principles regarding a definition and limits to contextualise the scope, field of application and objectives of traceability within Codex.

Within this context, Mexico supports the idea that a document be compiled containing the principles and directives for the application of traceability/product tracing in the context of food import and export inspection and certification systems. However, it is considered necessary that the Committee on General Principles establish certain limits for its application by the various Committees.

The foregoing would avoid a duplication of functions and the constant mutual correction of texts, and the resultant waste and confusion.

Additionally, Mexico would like to express its concern with regard to the development of these principles and directives.

- Even though traceability/product tracing can be applied to a broad range of situations, the focus should be on its application as one option in risk management. In this case, traceability would be treated as a health measure, in compliance with the Agreement on Sanitary and Phytosanitary Measures.
- It is believed that the directives should not detail methods or procedures, but rather leave this in the hands of the governments (it is stressed that risk management should be used as an option), and focus on the elements that should be considered for the implementation of a system, and on the results that it is hoped its implementation will provide, noting that such systems may differ between countries.
- The application of traceability should be taken on a case-by-case basis, in accordance with the nature of the risk and based on an assessment of the various management options, noting that once this option taken, the practical considerations that should be taken into account (elements to be considered and predicted results) should be more or less uniform (the elements may vary as a function of the nature of the risk, the methods and procedures adopted, and the implementation capacity of each country).
- The various procedures for the application of a traceability system by the countries should be open to recognition or the determination of equivalence.
- Traceability is not a guarantee of non-toxicity; it provides elements for checking compliance with the requirements for food non-toxicity and for intervening in situations in which there is an identified risk for food in the process or distribution chain.
- The implementation of a traceability/product tracing system could be costly, and so it should be limited to cases for which there is no alternative for achieving the desired aim. In such a case, its application should be justified and documented, taking into consideration in the decision elements such as the nature of the risk, the efficacy and efficiency of risk management through the application of traceability and the absence of less restrictive management options.

NEW ZEALAND

New Zealand congratulates the CCFICS Working Group on Traceability for its comprehensive work.

New Zealand would like to reiterate its view that existing CCFICS texts provide an adequate basis for addressing product tracing requirements where these are necessary for the purposes of health protection and/or fair trade practices. We do however acknowledge that there may be value in developing a consistent set of principles for the application of traceability/product tracing in the context of food inspection and certification systems.

We note that the Working Group report sets out a number of options for addressing this issue within CCFICS. Of the options presented New Zealand favours Option 3A as a basis to move forward. We do not however see any need to develop specific guidelines for the application of traceability/product tracing as proposed under Option 3B and its variants. We believe that existing CCFICS texts already address product identification and tracing requirements.

UNITED STATES

The United States respectfully submits comments to the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) in response to a request for comments on the *Discussion Paper on Traceability/Product Tracing in the Context of Food Import and Export Inspection and Certification Systems*, CX/FICS 03/4.

Comments

The United States expresses its thanks to the Working Group, and to Switzerland as Chair of the Working Group, for developing the *Discussion Paper on Traceability/Product Tracing in the Context of Food Import and Export Inspection and Certification Systems*. The document provides a good basis for the Committee's discussion of this important subject.

We note that the mandate of the Working Group was that it "should prepare a Discussion Paper with a complete analysis of the issues for circulation, additional comment and further consideration at the 12th Session of the CCFICS (December, 2003). This review should analyze the appropriateness and need for CCFICS to develop specific guidance on the practical implementation of traceability/product tracing and how the issue is to be progressed."

We believe that the Working Group has done a fine job on completing the mandate given to it.

We note that the Working Group recognized that it would be helpful if a workshop(s) were organized to address the application, scope and coverage of traceability/product tracing (T/PT). The United States agrees with the need for such workshops and that it would be appropriate for CCFICS to coordinate such an effort.

The United States notes in particular the concerns of developing countries as to whether they have sufficient capacity to meet the proposed requirements of T/PT, and to consider the costs of such systems. The United States expresses its support for these concerns and believes that such concerns should be considered within the proposed workshop(s) that may be undertaken with respect to T/PT.

With respect to the proposals that were made to divide T/PT into two components, one dealing with food safety, and one dealing with non safety, the United States notes that the principles relating to product tracing for food safety may differ somewhat from principles relating to non-safety. We also recognize that, while the mechanism of tracing product may differ from commodity sector to commodity sector, many of the fundamental processes of product tracing remain essentially the same irrespective of the purpose of product tracing. Thus, the United States believes that a single terminology, product tracing, should apply to the concept and activity of tracing products.

The United States recognizes that the Codex Committee on General Principles (CCGP) has the responsibility within Codex to develop a definition for T/PT. CCGP's role with respect to T/PT is currently limited to this area.

The United States notes the specific findings of the Working Group relating to T/PT:

- CCFICS texts do not provide specific guidance on T/PT *per se*.
- CCFICS texts do not provide a consistent set of principles on T/PT although they sometimes reference individual elements of T/PT.
- As CCFICS texts were developed for reasons other than providing guidance on the application of T/PT, there is no consistent presentation in those texts of principles or guidance that should apply to the concept of T/PT within the context of food import and export inspection and certification systems.
- The objectives of most of the examined texts would not be met more adequately if T/PT elements in most of the texts were included or strengthened.
- In view of current international developments, including the development and implementation of T/PT systems, it was suggested that CCFICS could play an important role by developing principles or guidelines for the application of T/PT for food import and export inspection and certification systems with a view towards harmonizing methods and procedures which could protect the health of consumers, ensure fair trading practices and facilitate international trade in foodstuffs.

The set of options put forward in the Discussion Paper range from not pursuing work on T/PT (Options 1A, 1B) to revision of one or more CCFICS texts (Options 2A, 2B) to new work on T/PT (Options 3A-E, Option 4A).

The United States believes that Codex should progress work on product tracing. Countries, including the United States, are moving forward with such systems to one degree or another for a variety of reasons and it would be helpful for Codex to develop international guidance in the area. Such work, however, should be carefully considered and progressed in a thoughtful, measured manner.

We believe that Codex, particularly with respect to its WTO recognition as the international standards setting organization for food safety, is the proper venue for the development of international guidance on T/PT. With this in mind, the United States believes the applicable options to consider are options 3A-E, and Option 4A.

To proceed in a measured manner, the United States believes that principles relating to product tracing should be developed before any consideration is given to guidance that might subsequently be developed. Similarly, we believe product tracing for reasons of food safety must have a higher priority than product tracing for reasons of non-safety.

Thus, the United States would strongly support that CCFICS' work on product tracing should begin with the development of principles relating to food safety (Option 3A modified). We further believe that this work can proceed even as CCGP develops a definition for T/PT for use by Codex. The principles developed by the Codex Regional Coordinating Committee for North America and the Southwest Pacific (CCNASWP) form a good basis for this work. Additionally, principles developed by the United States for use by the CCFICS Working Group on T/PT should also be helpful (see below).

As indicated above, the United States would also support CCFICS coordination of a workshop(s) on product tracing to consider various aspects of the subject including current practices relating to food safety, methods and ease of application across commodity sectors, costs and the issues associated with T/PT with respect to developing countries.

We believe that the T/PT principles, along with the definition being prepared by CCGP, will form the foundation for any further work on T/PT within CCFICS or elsewhere in Codex.

ATTACHMENT

Principles for the Application of Product Tracing by Governments with Respect to Food Safety as Developed by the United States

- a) Should facilitate the rapid removal of unsafe food products from the marketplace.
- b) Can be used to achieve a stated level of protection for a specific hazard(s) in a specific food product(s).
- c) Should have the ability to mitigate or eliminate the identified risk.
- d) Should be based on scientific information/data and a risk assessment as appropriate to the circumstances.
- e) Should be no more trade-restrictive than required¹.
- f) Should be applied equally to domestic and imported products.
- g) Should be limited to the steps in the food chain necessary to achieve the identified food safety objective.
- h) Should be imposed only when less intrusive and less intensive measures do not exist to achieve the stated goal.
- i) Should clearly identify the product(s) and hazard(s) subject to product tracing.
- j) Should be able to be implemented with procedures that are feasible, practical and effective.
- k) Should not require that there be excessive documentation to substantiate product tracing as an integral part of a product label or otherwise attached to the product.
- l) Should take into consideration the special concerns of developing countries.
- m) Should limit information requirements to what is necessary for appropriate control, inspection and approval procedures.
- n) Should, insofar as possible, require record keeping only one step back and one step forward at each point in food production and distribution.

¹ A measure is not more trade-restrictive than required unless there is another measure, reasonably available taking into account technical and economic feasibility, that achieves the appropriate level of protection and is significantly less restrictive to trade.

- o) Should endeavour to respect proprietary information and not interfere with manufacturer's ability to access markets.

CONSUMERS INTERNATIONAL (CI)

Consumers International [CI] commends the Delegation and Government of Switzerland for its good Chairmanship of the Working Group on Traceability/Product Tracing. We also thank all the Members who contributed to the elaboration of the Discussion Paper on Traceability/Product Tracing in the Context of Food Import and Export Inspection and Certification Systems, which in our opinion, is ready to enable CCFICS make progress on this subject at this session.

CI believes that there is a need for specific guidance on traceability/product tracing as reflected on paragraph 24 and 25 of the discussion paper and supports the appropriateness of this work being taken forward by CCFICS.

CI is however concerned about the issues raised by some developing countries regarding the cost implications of the implementation of a traceability/product tracing system. To this end CI proposes that FAO and/or WHO convene an expert consultation on traceability/product tracing technologies and documentation systems to inform Members of alternative systems and their cost implications. This consultation would take place in addition to the workshops or seminars proposed in paragraph 21 and the enhanced discussion recommended amongst Members in paragraph 33 before implementation of the option/s that the Committee agrees to.

With regard to the Options presented to the Committee by the Working Group, CI is opposed in principle to Option 1A [suspension of work] because of the obvious need for a traceability/product tracing system and the progress made so far both within CCFICS and other Codex Committees.

While CI in principle supports Option 1B [awaiting guidance from other Codex Committees in particular CCGP], we are concerned at any potential delays that may result in taking this important work forward in a timely manner.

Therefore CI supports implementation of Option 4A [revision of the Principles for Food Import and Export Inspection and Certification (CAC/GL 20-1995) in order to include horizontal principles/guidelines on the application of traceability/product tracing within CCFICS and development of a new horizontal document containing "guidelines for the practical implementation of traceability/product tracing" within CCFICS]. CI prefers this option as the document to be revised applies across CCFICS and hence would be an appropriate entry point. We also believe that development of a 'guidelines' document would facilitate harmonization amongst Member states in the implementation of traceability/product tracing systems at the national level.

EUROPABIO

EuropaBio appreciate the opportunity to provide comments on the above paper. We strongly believe that the traceability/product tracing work within the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) is both timely and important.

We commend the CCFICS working group (WG) on its thorough analysis of the "elements" of traceability/product tracing in existing CCFICS texts. We agree with the conclusion of the WG that these texts already contain elements of product tracing. Further, we believe that as these texts were not intended to address product tracing, there is no need to expand the texts. We do not support re-opening or redrafting CCFICS texts to include language on traceability/product tracing, and believe that there are better mechanisms to ensure that elements of traceability/product tracing are integrated into food import and export inspection systems.

In considering the work product generated by the second meeting of the WG in September 2003, EuropaBio believes the paper is complete; we commend the WG for accomplishing its mandate.

The following input is in response to the specific request about the future work of CCFICS on traceability/product tracing.

1. We support initiation of work on principles for application of traceability/product tracing within CCFICS which could provide the most useful tool for countries considering or applying tracing in their import and export inspection and certification systems. Such a document would also be more timely than developing a guidelines document or a revision of the CCFICS texts. EuropaBio supports option 3A of the WG “options” paper.
2. Priority for the principles work in CCFICS should be placed on SPS objectives.
3. CCFICS should consider the work of the Codex Regional Coordinating Committees that exist (e.g. NASWP) on traceability/product tracing as a good basis for its work.

The global plant science and agricultural biotechnology industries are keen to be involved, and to assist where possible, as member governments move toward the establishment of product tracing/ traceability principles within Codex. We support CCFICS as the appropriate venue for the work and encourage the CCFICS to start work on the development of such principles as soon as possible.

Thank you again for the opportunity to provide these comments.

INTERNATIONAL LIFE SCIENCES INSTITUTE (ILSI)

On behalf of the International Life Sciences Institute (ILSI), I am pleased to submit the attached comments on the Discussion Paper, *Traceability/Product Tracing in the Context of Food Import and Export Inspection and Certification Systems* (CX/FICS 03/4).

ILSI is a non-profit, worldwide foundation established in 1978 to advance the understanding of scientific issues relating to nutrition, food safety, toxicology, risk assessment, and the environment by bringing together scientists from academia, government, industry, and the public sector to solve problems with broad implications for the well-being of the general public. ILSI receives financial support from industry, government, and foundations.

ILSI is affiliated with the World Health Organization as a nongovernmental organization and has specialized consultative status with the Food and Agriculture Organization of the United Nations. Thus, it is as a nongovernmental organization that we respectfully submit these comments.

Comments from the International Life Sciences Institute (ILSI) regarding the Discussion paper, *Traceability/Product Tracing in the Context of Food Import and Export Inspection and Certification Systems* (CX/FICS 03/4)

ILSI appreciates the work done by the Delegation of Switzerland in preparing the discussion paper for the second working group meeting to be held in September 2003.

In keeping with ILSI’s understanding of the role of Codex to develop scientifically based standards to protect human health through improved food safety, it is appropriate to require product information and product identification. Both are essential for a food safety objective related to a product recall.

It is unclear what the scientific basis for “linkages” between product information and product identification would be. If the underlying objective in support of traceability/product tracing is protection of human health through improved food safety, then a scientific rationale for inclusion of “linkages” must be developed before this concept can be included in Codex standards and guidelines.

To ensure that a strong science base is present for further action by CCFICS in the area of traceability/product tracing, a set of overarching principles relating to traceability/product tracing to food safety objectives should be developed.