

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 4

CX/FICS 04/13/6
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Thirteenth Session

Melbourne, Australia, 6 – 10 December 2004

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

BACKGROUND

1. The 12th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (Brisbane, Australia, December 2003) discussed the subject of traceability/product tracing. The Committee agreed that the Australian Secretariat would prepare a document containing a preliminary set of Principles on traceability/product tracing, based on the discussion that has occurred over the past two years in the Regional Coordinating Committees. CCFICS agreed that the document would be circulated for comments through a Circular Letter to all Member countries and international organizations with observer status within Codex. Accordingly CL 2004/6 FICS was distributed in April 2004.
2. The Committee also agreed that the Australian Secretariat would prepare a further discussion paper, based on the above document, together with comments received, the outputs and recommendations from seminars and workshops (as appropriate), discussions in the Codex Committee on General Principles and other relevant Codex Committees and Regional Coordinating Committees, and other relevant documents, for circulation and discussion at its next meeting.¹

CURRENT POSITION / DEVELOPMENTS WITHIN CODEX SINCE CCFICS 12 IN RELATION TO TRACEABILITY / PRODUCT TRACING

3. The 27th Session of the Codex Alimentarius Commission² adopted a definition of traceability / product tracing for inclusion in the Codex Procedural Manual as:

Traceability / product tracing: the ability to follow the movement of a food through specified stage(s) of production, processing and distribution.³

4. The 27th CAC also requested that CCFICS present a proposal for new work on principles for the application of traceability/product tracing as a matter of priority.⁴

5. In response to CL 2004/6 – FICS, the Australian Secretariat of CCFICS received comments from Argentina, Bolivia, Canada, Costa Rica, European Community; Guatemala, Guyana; Honduras; Indonesia; Panama, South Africa, USA, Venezuela, 49th Parallel, CropLife International, Europabio and the International Dairy Federation. The comments received can be found in CX/FICS 04/13/6-Add 1 (the comments have been reproduced in their original language only).

¹ ALINORM 04/27/30, paras 72 and 74

² ALINORM 04/27/41, paras 17 - 20

³ ALINORM 04/27/33A, Appendix IV

⁴ ALINORM 04/27/41, para 20

ANALYSIS OF COMMENTS

6. The comments received included both general comments relating to structure and terminology, and specific comments on the content of the proposed draft principles. Comments include:

- There should be consistency with the obligations of countries that are WTO members, particularly in respect of:
 - transparent development and application of traceability/product tracing;
 - measures being:
 - least trade restrictive;
 - based on risk assessment and proportional to risk;
 - subject to equivalence; and,
 - special and differential treatment for developing countries. (*Implied in most responses*)
- Traceability / product tracing may not be applicable to all commodities and systems, (*Canada*) particularly food production in remote and small scale operations, wild harvesting etc (*South Africa; Indonesia*)
- There should be recognition of the distinction between the uses of traceability / product tracing and elements of traceability / product tracing system (*CropLife*)
- Terminology must be consistent with terminology used in Principles for Food Import and Export Inspection and Certification (CAC-GL 20-1995) (*European Community*)
- In constructing principles care should be taken to ensure the material is “principles” rather than introductory or descriptive material (*USA*)
- Concern in regard to correct translation to Spanish (*Guyana*)
- The CCFICS work should take into account work of the ISO working group of TC 34 (*European Community*)
- Aspects of traceability / product tracing are already incorporated within general labelling and HACCP guidelines (*Guyana*) and are used by industry for satisfying consumer and commercial demands (*49P*)
- The application of traceability/product tracing requirements should be limited to the relevant stages of the food chain (*USA*) and should apply to processed food only (*Indonesia*)
- Cost / benefit analysis should be done before application of traceability/product tracing to a particular product (*USA, CropLife*), including cost of absence of system (*European Community*)
- The principles should incorporate the adopted⁵ definition of traceability / product tracing (*Canada, Costa Rica, Argentina, Honduras, IDF*)
- Further explanatory material would be helpful, particularly in describing the basis of traceability / product tracing initiatives mentioned in Principle 4 (of CL 2004/6 FICS) (*Canada*)
- The application of traceability/product tracing should be justified on a case by case basis (*implied in most responses*)
- Competent authorities should institute requirements so that any participant in the food production chain should know the immediate source of the food and its immediate destination ie. a “one step forward” and “one step back” for use in management of food safety risks (*implied in most responses*)
- Information on the nature of controls conducted a specific steps should be recorded to avoid unnecessary duplication of controls (*European Community*)
- Information that may be necessary for conducting traceability/product tracing should not be required on food labels. (*USA, Costa Rica, Argentina, Guyana, Bolivia, Guatemala Venezuela*)

⁵ ALINORM 04/27/41, para 20

7. Several responses suggest that the priority of work on traceability / product tracing should be (at least initially) in relation to its application to food safety risk management. (*Canada, EuropaBio, implied by Argentina, Costa Rica, Guyana, Bolivia, Guatemala, Honduras, Panama, Venezuela*). The USA noted that consensus would be more likely if the principles initially focussed on food safety applications, and proposed separate sets of principles for food safety management and “non-food safety” matters.

8. Many of these points are consistent with observations of the regional Coordinating Committees.

9. Annex 1 is a revised preliminary set of draft principles, which attempts to incorporate the main themes represented in comments received in response to CL 2004/6 FICS. The draft discussion document identifies principles pertaining to rationale, scope and design which conforms to the pattern established in *Principles for Food Import and Export Inspection and Certification CAC-GL 20-1995*.

10. Members will recall that at the 12th Session of CCFICS used a template to format new work proposals. The template took account of the *Criteria for the Establishment of Work Priorities* and the related discussion at the 19th Extraordinary Session of the Codex Committee on General Principles (Paris, November 2003). A draft Project Document for a new work proposal is at Annex 2. This draft document is presented for discussion and may assist the Committee in preparing a proposal for new work, as was requested by Commission.

RECOMMENDATIONS

- That CCFICS note the request from Commission⁴ “**requested** the CCFICS to present a proposal for new work on principles for the application of traceability/product tracing as a matter of priority” and consider the options for addressing this request.
- That CCFICS discuss the attached preliminary set of draft principles (Annex 1)
- That CCFICS discuss the draft Project Document (Annex 2) as basis for a new work proposal to be put forward through the Executive Committee to the 28th Session of the Codex Alimentarius Commission.

ANNEX 1**PROPOSED PRELIMINARY DRAFT SET OF PRINCIPLES FOR THE APPLICATION OF TRACEABILITY / PRODUCT TRACING WITH RESPECT TO FOOD INSPECTION AND CERTIFICATION****SECTION 1 INTRODUCTION**

1. The confidence that consumers have in the safety and suitability of food derives, in part, from the perception of the effectiveness of the food control measures, including inspection and certification. Traceability/product tracing is a tool or requirement that may be applied, when and as appropriate, within a food inspection and certification system. Inspection, including observation, testing and record-keeping, can be one of the primary tools for verifying that a particular batch of food has been treated in a specified manner through the various phases of processing and handling of foods. Certification is one means of attesting to interested parties as to the health status and characteristics of a food.

2. A traceability/product tracing requirement, when linked to process control measures, can provide confirmation that foodstuffs comply with food safety requirements, such as conditions of production, processing and distribution. It may also provide confirmation that other requirements, as specified by the food inspection and certification system, are met. Traceability / product tracing can also be used as a food safety risk management option to prevent distribution and /or enable rapid recall of a particular food product upon identification of an associated health risk.

SECTION 2 OBJECTIVE

3. This document elaborates a set of principles to assist competent authorities in determining the appropriate design and application of traceability / product tracing requirements. These principles cover the rationale and application of traceability /product tracing requirements

SECTION 3 DEFINITIONS

*Inspection*⁶ is the examination of food or systems for control of food, raw materials, processing and distribution, including in-process and finished product testing, in order to verify that they conform to requirements.

*Certification*⁴: is the procedure by which official certification bodies and officially recognised bodies provide written or equivalent assurance that foods or food control systems conform to requirements. Certification of food may be, as appropriate, based on a range of inspection activities which may include continuous on-line inspection, auditing of quality assurance systems, and examination of finished products.

*Requirements*⁴: are the criteria set down by the competent authorities relating to trade in foodstuffs covering the protection of public health, the protection of consumers and conditions of fair trading.

*Equivalence*⁷: is the capability of different inspection and certification systems to meet the same objectives.

Traceability / product tracing: the ability to follow the movement of a food through specified stage(s) of production, processing and distribution.⁸

SECTION 4 PRINCIPLES**Rationale for traceability/product tracing**

4. Traceability/product tracing requirements should have clear justification with respect to food safety and/or ensuring fair practices in food trade.

⁶ CAC/GL 20 – 1995. Principles for Food Import and Export Inspection and Certification

⁷ CAC/GL 26 –1997 Guidelines for the Design, Operation, Assessment and Accreditation of Food Import and Export Inspection and Certification Systems

⁸ ALINORM 04/27/33A APPENDIX IV

Scope of traceability/product tracing within food inspection and certification systems

5. The scope of traceability/ product tracing requirements should be justified on a case-by-case basis according to the objective(s) of the food inspection and certification system within which product tracing is implemented.
6. The extent of application of traceability/product tracing should be based on an assessment of risks and with due consideration to the requirement for traceability/product tracing to be no more trade restrictive than required. Alternative measures or technical regulations should be adopted where those alternatives achieve the identified objective, are technically and economically feasible and less trade restrictive than traceability/product tracing requirements.
7. Traceability/product tracing requirements should be confined to recording the movement of food along the food continuum from where the food came (one step back) and to where the food went (one step forward).

Design of traceability/product tracing within food inspection and certification systems

8. Traceability/product tracing requirements should be designed in terms of performance rather than prescriptive specifications.
9. Traceability/product tracing requirements should be designed to cover only those stages in the food chain, which are necessary to achieve the objective.
10. Application of traceability/product tracing requirements should be effective, practical, technically and economically feasible and proportional to the risk that is being controlled.
11. A traceability/product tracing requirement, including its scope and related procedures within a food inspection and certification system, should be available for consideration and comment by trading partners.
12. Traceability/product tracing requirements applied by an importing country should be subject to equivalence if an exporting country seeks to engage in the process to judge equivalence of an alternative measure.
13. The application of traceability/product tracing requirements should take into account the capabilities of developing countries.

ANNEX 2

PROPOSAL FOR NEW WORK – CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS**PREPARED BY:**

Australia

PURPOSE AND SCOPE OF THE PROPOSED STANDARD⁹.

The document as proposed will cover the principles pertaining to traceability/product tracing requirements in relation to an official food inspection and certification system.

ITS RELEVANCE AND TIMELINESS.

The proposed work is directly related to CCFICS terms of reference, ie:

- a) to develop principles and guidelines for food import and export inspection and certification systems with a view to harmonising methods and procedures which protect the health of consumers, ensure fair trading practices and facilitate international trade in foodstuffs;
- b) to develop principles and guidelines for the application of measures by the competent authorities of exporting and importing countries to provide assurance where necessary that foodstuffs comply with requirements, especially statutory health requirements.

The 27th Session of the Commission has asked CCFICS to prepare a new work proposal¹⁰.

THE MAIN ASPECTS TO BE COVERED.

Principles relating to traceability / product tracing requirements within food inspection and certification systems.

AN ASSESSMENT AGAINST THE *CRITERIA FOR THE ESTABLISHMENT OF WORK PRIORITIES.*

The proposed work could assist in harmonising national traceability/ product tracing requirements and minimising potential impediments to international trade.

INFORMATION ON THE RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENTS.

The previous working group lead by Switzerland provided detailed assessment of the relationship between existing CCFICS texts and the concept of traceability / product tracing. The analysis was presented to CCFICS at the 11th Session of CCFICS, CX/FICS 02/11/7. That analysis found that the existing CCFICS texts did not adequately cover the principles for traceability/product tracing.

IDENTIFICATION OF ANY REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE.

Nil

⁹ For the purpose of this document the word “standard” is meant to include any of the recommendations of the Commission intended to be submitted to Governments for acceptance.

¹⁰ ALINORM 04/27/41, Para 20

IDENTIFICATION OF ANY NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES SO THAT THIS CAN BE PLANNED FOR.

Nil

THE PROPOSED TIMELINE FOR COMPLETION OF THE NEW WORK, (including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years.)

In response to the request of the Codex Alimentarius Commission, the new work should commence following the 2005 Commission meeting. A preliminary set of principles is already under discussion and subject to approval of the new work could be circulated at Step 3 as early as August 2005. The 13th Session of CCFICS could provide to the Commission details in respect of a proposed work program including participants and mode of draft preparation. This section would be completed after the decision of 13 CCFICS is made.

The decision to undertake new work or to revise standards shall be taken by the Commission on the basis of a critical review conducted by the Executive Committee.

WORK TO BE LEAD BY:

To be determined

MEMBERS OF ELECTRONIC WORKING GROUP:

To be determined (if relevant)