

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 7

CX/FICS 07/16/7

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

**Sixteenth Session
Surfer's Paradise, Queensland, Australia, 26-30 November, 2007**

**DISCUSSION PAPER ON THE NEED FOR FURTHER GUIDANCE ON
TRACEABILITY/PRODUCT TRACING**

(Prepared by Norway)

Background

1. The 27th Session of the Codex Alimentarius Commission adopted in 2004 the definition¹ of Traceability/Product Tracing developed by CCGP², and the definition was included in the Procedural Manual.
2. In order to facilitate development of a Codex text on Traceability/Product Tracing it was agreed to focus on principles for the application of Traceability/Product Tracing in the context of food import and export inspection and certification systems. The 29th Session of the Commission adopted in 2006 *Principles for Traceability/Product Tracing as a tool within a food inspection and certification system* (CAC/GL 60-2006), which had been developed by CCFICS³.
3. The question has been raised whether there is a need to develop additional Codex guidance to governments on Traceability/Product Tracing as a tool within food inspection and certification systems. The 15th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems agreed to the proposal of the Delegation of Norway to prepare a discussion paper on the need for further guidance on Traceability/Product Tracing⁴. In this regard, some delegations were in favour of the development of further guidance, while others considered this premature because more experience was needed with the recently adopted Codex Principles for Traceability/Product Tracing as a Tool within a Food Import and Export Inspection and Certification System (CAC/GL 60-2006).

¹Traceability/product tracing: *The ability to follow the movement of a food through specified stage(s) of production, processing and distribution*

² ALINORM 04/27/33A para. 85 - 96

³ ALINORM 06/29/30 paragraph 50 – 80

⁴ ALINORM 07/30/30 para.76

Current Situation

4. Food safety has been a growing concern both among consumers and national authorities. Zoonotic agents and presence of chemicals above acceptable limits in food, can threaten both the safety and quality of food products. Traceability/Product Tracing does not itself make food safe but as a risk management tool it will be used in order to assist in containing a food safety problem and in improving the reliability of the information provided to consumers. As such, Traceability/Product Tracing is meant to ensure that targeted and accurate withdrawals can be undertaken, appropriate information can be given to consumers and food business operators, risk assessment can be performed by control authorities and unnecessary wider disruption of trade can be avoided.

5. Traceability/Product Tracing has been proven useful, and a number of countries have chosen to incorporate the Traceability/Product Tracing tool in the food legislative framework for use by the competent authorities. In this context also various national and international guidance on Traceability/Product Tracing have been developed, however further guidance from Codex would help countries to efficiently implement this tool in a harmonised way.

6. In addition to the minimum requirements that a government may decide to incorporate in the food legislation concerning use of Traceability/Product Tracing tool, commercial trading partners may agree on provisions exceeding minimum requirements in the food legislative framework.

7. The objectives of Traceability/Product Tracing measures may vary and are often based on guidance from various international standard setting organisations. Objectives related to the health of the consumers and ensuring fair practices in the food trade are within the scope of the work of Codex Alimentarius Commission. Systems based on the Traceability/Product Tracing tool implemented by food businesses are often based on guidance provided by private commercial network/organisations.

Guidance to Governments on Traceability/Product Tracing

8. Codex has developed a definition and a set of principles for national authorities when deciding to use Traceability/Product Tracing. In addition to the Principles for Traceability/Product Tracing as a tool within a food inspection and certification system (CAC GL 60-2006) elements of Traceability/Product Tracing are also found in other texts⁵ mostly linked to product identification and information to be exchanged, however these texts do not have the objective of Traceability/Product Tracing. The principles are general and overarching and therefore governments might need further guidance on the implementation of Traceability/Product Tracing and this is now up for discussion in CCFICS.

9. The World Organisation for Animal Health (OIE) has developed a short text defining the principles of *Animal identification and traceability*. The principles define both these concepts as tools to increase effectiveness of relevant activities related to animals and animal products. A new text is now being proposed as *Guidelines on the design and implementation of identification systems to achieve animal traceability*. This text is a new draft that was proposed in March 2007 and will be revised towards adoption in May 2008.

Guidance to food businesses on Traceability/Product Tracing

10. Several International Standards (ISO) and European Standards (EN) have been published that are related to traceability in the food chain and aimed to assist the food producing industry. These standards are in the following areas: Quality management systems, Food safety management system, Traceability of Fish Products, Data capture techniques and Electronic interchange of data elements and documents in commerce, industry and administration.

⁵For example Codex standard 1-1985 (labelling), CAC/GL 19-1995, CAC/GL 25/1997 (information to be exchanged)

11. ISO/TC 34 is a draft International Standard on traceability in the feed and food chain. ISO/FDIS 22005 Traceability in the feed and food chain – General principles and basic requirements for system design and implementation is scheduled to be published as an International Standard at the end of 2007. The standard gives the principles and specifies basic requirements for the design and implementation of a feed and food traceability system.

12. Several international organizations are also developing documents in this area. These documents are more of a technical nature, i.e. UN/CEFACT on electronic interchange of data elements and GS1 (Global Standards 1 former EAN) on guidelines for traceability of different types of foodstuffs. Systems developed by different standard setting organisations and private projects are often very detailed based on advanced electronic equipment.

Is there a Need for Codex to Develop Further Guidance to Supplement the Codex Principles?

13. While respecting the Codex principles⁶ CCFICS may wish to consider developing further guidelines for governments that have decided to use the Traceability/Product Tracing tool. Whether there is a need for additional Codex guidelines to complement the principles may be considered with a review of the following elements:

- An analysis of existing CCFICS texts in 2003⁷ showed that they did not provide specific guidance on Traceability/Product Tracing per se, since they were developed for reasons other than providing guidance on the application of Traceability/Product Tracing, therefore principles on Traceability/Product Tracing were developed. However these principles are broad and general and may not give sufficient guidance to assist governments in making informed decisions on whether to include Traceability/Product Tracing in their food inspection and certification system.
- In view of the current international developments Codex needs to consider whether the development of guidelines on Traceability/Product Tracing can help avoiding that complicated systems introduced by the industry also become the requirements in national food legislation and thereby becoming a barrier to trade.
- Competent authorities may need both principles and guidelines from Codex if they decide to incorporate the Traceability/Product Tracing tool in their food inspection and certification system.
- The difficulties faced by the developing countries in implementing the Traceability/Product Tracing tool should be fully taken into consideration.
- Countries having implemented requirements on Traceability/Product Tracing in their national legislation, may have applied different levels of details, which again may constitute barriers to trade, Codex should thus consider the need for an appropriate legislative baseline on Traceability/Product Tracing.
- The commercial interests in developing standards for the food industry with the objectives to implement requirements in food trade.
- When considering the cost of implementing Traceability/Product Tracing, the economical consequences of the absence of a Traceability/Product Tracing system should also be taken into account.

Recommendation

The Committee May Wish to Consider:

- a) If there is a need for guidance on Traceability/Product Tracing
- b) If yes, the form of such guidance
- c) If yes, the draft proposal for new work

⁶ CAC/GL 60-2006

⁷ CX/FICS 03/4, ALINORM 04/27/30 (para 62-74)

ATTACHMENT 1**Project Document****Proposal for New Work to Develop Guidelines on Traceability/Product Tracing****Prepared by: NORWAY****1. Purpose and scope of the proposed standard**

Codex guidelines on Traceability/Product Tracing would assist countries willing to implement the Traceability/Product Tracing tool and may, together with the already adopted principles, provide a framework for the development and operation of this tool with a view to protect consumer health, facilitate fair practices in food trade, deliver reliable information to consumers and avoid unnecessary trade disruption while ensuring that unjustified technical barriers to trade are not introduced.

The guidelines may assist national authorities with practical guidance in the application of Traceability/Product Tracing as an information tool which allows the tracing of food products one step back and one step forward through the distribution chain. In this way it can be used as a risk management tool to adopt focused measures should a specific hazard be identified by facilitating rapid and targeted withdrawal or recall of the involved food from the market place and thereby minimising the potential negative impact on the health of consumers, economic losses and the potential negative impact on food trade.

Traceability/product tracing 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 (e.g. country of origin, organic farming, religious concerns such as kosher or halal), as specified by the food inspection and certification system, are met.

2. Relevance and timelines

A number of countries have developed and implemented requirements on Traceability/Product Tracing, however application of Traceability/Product Tracing in various countries have different levels of details. In view of the current international developments, Codex needs to develop guidelines for minimum requirements to assist governments in implementing Traceability/Product Tracing with a view to avoid that complicated and non harmonised systems be introduced and thereby becoming barriers to trade.

3. The main aspects to be covered

The principles⁸ are overarching and general and therefore governments could need further guidance on the implementation of Traceability/Product Tracing.

The guidelines will include elements to help understanding and implementing the concept of Traceability/Product Tracing: *Product identification* (the ability to identify a food), *Product information* (where it came from, how it was changed and where it was sent, that is one step forward and one step back) and *The linkages between product identification and product information*.

The guidelines will assist national authorities with practical guidance in the application of the Traceability/Product Tracing tool. Guidelines may elaborate on the role of *traceability in risk management, the use of traceability for product integrity, authenticity and identification, the use of*

⁸ CAC/GL 60-2006

*equivalent measures, the practicability of traceability, and in particular the feasibility of its application in developing countries, consumer confidence and information concerning the nature and origin of products and the possibilities of using traceability for liability and redress*⁹.

4. An assessment against the criteria for the establishment of work priorities

Developing guidelines on Traceability/Product Tracing falls under the general criterion of consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and criteria applicable to general subjects in regard to work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies). In that regard, close cooperation with the World Organisation for Animal Health (OIE) is of utmost importance to avoid contradictions, gaps and duplications in the standards referenced by WTO.

This new work also falls under criteria in regard to diversification of national legislations and apparent resultant or potential impediments to international trade.

5. Relevance to Codex strategic objectives

Objective 1 Promoting Sound Regulatory Framework

Guidelines on Traceability/Product Tracing could help in providing essential guidance for member countries and in promoting the development of national food control systems based on international principles and criteria for the reduction of health risk along the entire food chain.

Objective 3 Promoting Linkages/ between Codex and other Multilateral Regulatory Instruments and Conventions

Developing guidelines on Traceability/Product Tracing is in line with the objective to interact closely with related international bodies and take due account of international regulatory initiatives and developments thereby promoting coordination of all food standards work undertaken by international governmental and nongovernmental organizations.

Objective 4 Enhance Capacity to Respond Effectively and Expeditiously to New Issues, Concerns and Developments in the Food Sector

Discussions from CCFICS sessions, regional committees and working groups have shown that development in the area of Traceability/Product Tracing as a risk management tool is increasing. With regard to international food trade, Traceability/Product Tracing is a tool which is more and more used.

6. Information on the relation between the proposal and other existing Codex documents

An examination of existing CCFICS texts¹⁰ concluded that these texts do not provide specific guidance on Traceability/Product Tracing per se, as each CCFICS text was developed in order to address specific objectives. However, it is noted that most texts do contain individual elements of Traceability/Product Tracing, such as product identification or product information, which are relevant considering the objectives pursued by each text and the Committee agreed that existing CCFICS texts did not need to be re-opened with regard to Traceability/Product Tracing. A Working Group considered whether existing CCFICS texts would need to be complemented by specific principles and/or guidance on Traceability/Product Tracing in order to provide additional information to help protect the health of consumers and ensure fair practices in food trade, and principles were developed and adopted in 2005.

⁹ ALINORM 01/21 Part IV – Add. 1

¹⁰ CX/FICS 03/4, ALINORM 04/27/30 (para 62-74)

7. Identification of any requirement for and availability of expert scientific advice

Nil

8. Identification of any need for technical input to the standard from external bodies

Nil

9. The proposed time-line for completion the new work

3 years: 1.5 years to reach step 5; 1.5 more years to reach step 8.