

codex alimentarius commission



FOOD AND AGRICULTURE
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Agenda Item 7

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

Seventeenth Session

Cebu, Philippines, 24-28 November 2008

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

(prepared by an electronic working group led by Norway with the assistance of Australia, Belize, Brazil, Canada, Czech Republic, European Community, Indonesia, Ireland, Japan, Mexico, Netherlands, New Zealand, Philippines, Poland, Peru, South Africa, United Kingdom, United States, OIE, FIVS and ICGMA)

BACKGROUND

1. The 27th Session of the Codex Alimentarius Commission adopted in 2004 the definition¹ of Traceability/Product Tracing (T/PT) developed by the Codex Committee on General Principles², and the definition was included in the Procedural Manual.
2. The 13th CCFICS agreed on the need to develop principles for the application of T/PT in the context of food import and export inspection and certification systems³. 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 CCFICS⁴.
3. At the 15th Session of CCFICS in 2006 the Committee agreed to the proposal of the Delegation of Norway to prepare a discussion paper on the need for further guidance on T/PT⁵.
4. At the 16th Session of CCFICS in 2007, the Committee considered the discussion paper prepared by Norway⁶. The Committee agreed to establish an electronic Working group, led by Norway to prepare a revised discussion paper to clearly describe the present gaps in the implementation of T/PT, identify the key elements of the guidelines that would address these gaps, and consider the technical and economical feasibility of countries to implement T/PT for consideration at its next session.

¹*Traceability/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 05/28/30 para. 92

⁴ ALINORM 06/29/30 paragraph 50 – 80

⁵ ALINORM 07/30/30 para. 76

⁶ ALINORM 08/31/30 para.68 - 72

The mandate and work of the electronic working group

5. *The working group should prepare a revised discussion paper. The revised paper should consider the discussion during the 16th session of CCFICS (ALINORM 08/31/30 para 68 – 71) and written comments; it should clearly describe the present gaps in the implementation of traceability/products tracing, identify the key elements of the guidelines that would address these gaps and consider the technical and economical feasibility of countries to implement traceability/product tracing.*

6. An invitation to participate in the Electronic Working Group (EWG) was sent out to all members of Codex. A questionnaire to gather information on members view and experience with regard to the use of T/TP was distributed to all WG participants and 19 responses were received. A summary of the answers received were sent out for comments to EWG members and comments from 1 country on this summary was received. A brief summary of the result of the questionnaire is attached in Annex I to this paper.

Conclusion

7. Information gathered from the questionnaire has been useful to compare national policies and legislation and has provided an overview on experiences by countries that have incorporated T/PT into their legislation and/or policies. However the ability to clearly identify specific gaps in relation to the implementation of T/PT will require further discussion and more detailed information from member countries. Also, very little information is received from countries which have not implemented T/PT into their legislation and/or policies. Therefore, at this time, it not possible to answer affirmatively that there is a need for further guidance.

8. As a first step on deciding whether there is a need to develop guidance, the information gathering has given a better background on the diverse range of views and experiences. However the lack of detailed information and the fact that it is not possible to extract any common recommendation from the EWG members, we would like to suggest that CCFICS awaits further discussions on new work relating to guidelines on T/PT.

9. Based on the importance of implementing T/PT and the lack of information from all regions, the EWG suggest that a further discussion on the need for guidance on T/PT in Codex would be helpful. This might be best done through discussions in Codex Regional Coordination Meetings with comments/results from these discussions sent to CCFICS.

Recommendation

10. Whilst noting that the Strategic Plan 2008 – 2013 Activity 1.4 references the development of standards and related texts for traceability/product tracing the WG recommends that the Committee defer consideration of the need to develop further guidance on T/TP until there has been further discussion by the Regional Coordinating Committees on the need for any additional guidance.

SHORT SUMMARY FROM THE ELECTRONIC WORKING GROUP ON TRACEABILITY/PRODUCT TRACING 2008

Experience of member countries

T/PT has been proven useful, in that once there is an ability to trace a product that product can be traced for whatever purpose. T/PT has the benefit of being applicable to the management of previously unforeseen or unidentified risks which makes it an important tool. A number of countries have chosen to incorporate the T/PT tool in the food legislative framework for use by the competent authorities. In this context various national and international guidance on T/PT have been developed.

Codex has developed a definition and a set of principles for national authorities when deciding to use T/PT. Some countries which have implemented traceability requirements in their national legislation/policies/standards have made use of the Codex principles. Other countries legislation/policies/standards are consistent with the Codex principles, but were developed prior to the adoption of the Codex principles. Other countries stated that they have not implemented the principles as they are newly introduced.

The objectives of T/PT measures and the basis for member countries to employ this tool encompass nutrition, health risks, deceptive marketing practice, withdrawal and economic considerations and are often based on guidance from various international standard setting organisations.

Many countries have met a diverse range of challenges when incorporating T/TP into their legislation or policies and using T/PT. The main challenges have been

- composing the legislative framework, implement and control
- missing detailed guidelines on the frameworks design and implementation
- lacking concrete criteria for implementation by food business operators
- defining practical rules, also related to imported products
- tracing animal product between countries
- specifying the different species
- low social awareness on the nature of T/PT and its necessity
- identifying different role players in the food chain, including who was supposed to be registered, and convincing and explain why registration is necessary and important
- meeting different market requirements
- balancing between implementation costs and final product prices
- balancing the needs of consumers and industry, in particular ensuring that public health and consumers' interests were fully protected, without imposing undue administrative burdens on industry
- coordinating between the competent sectors in order to cover the entire food chain and demonstrating the benefits of using traceability which should outweigh the costs
- improving the effective supervision in all the agents of the food chain and ensuring inter-operability between traceability database, and between traceability databases and emergency response systems

Some challenges faced have been solved, while other remains still to be solved. Solutions that were found to solve some of these mentioned challenges were to develop specific legislation, traceability guidelines, control measures, enforcement strategies, advisory committees, traceability portal, data dictionary and data exchange protocol. Other solutions have been to research on experiences of other countries, provide for training and frequent meetings with stakeholders, press releases, adverts and road shows awareness programs.

Conclusion

There is a diverse range of views in the EWG with regard to the need for further guidance and there might also be alternative approaches that could address the needs regarding implementation of T/PT. To allow an ample debate on this matter, further discussions on T/PT within Codex may bring in alternative approaches in addition to the discussions on guidelines.