

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTY-FIRST SESSION
OTTAWA, CANADA, 28 APRIL - 2 MAY 2003**

**CONSIDERATION OF FOOD LABELLING AND TRACEABILITY
(CL 2002/24-FL)**

COMMENTS FROM:

**CANADA
EUROPEAN COMMUNITY**

CONSIDERATION OF FOOD LABELLING AND TRACEABILITY (CL 2002/24-FL)

GOVERNMENT COMMENTS

CANADA:

Canada notes that while the 49th (Extraordinary) Session of the Executive Committee recognized a dual application of “traceability / product tracing” as having a food safety objective (i.e., as an SPS measure); or as having a legitimate objective as a TBT measure. It expressed the opinion that a first consideration should be given to the use of “traceability/product tracing” as a risk management option. Canada also notes that the 25th (Extraordinary) Session of the CAC, held in February 2003 to consider the Report of the Evaluation of Codex, reasserted that the first priority in the development of Codex standards was the protection of consumers’ health and safety.

Canada therefore continues to support that priority be given to consideration of the use of traceability / product tracing as one food safety risk management tool which may be applied to protect the health of consumers.

Canada notes the discussions held at the 7th Session of the Coordinating Committee for North America and the South West Pacific and the 11th CCFICS meeting on this topic and agrees with the conclusions drawn by both committees regarding traceability / product tracing.

We support the continuation of activities undertaken by the Codex Committee on General Principles, noting that, at the 18th Session of CCGP, it was agreed that a definition of “traceability / product tracing” would be developed for consideration at its next regular meeting. Further review of this matter within CCGP was to follow the completion of the ongoing work by the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) Working Group.

Canada recommends that the Codex Committee on Food Labelling awaits the outcome of these activities before engaging in detailed discussion in this area.

EUROPEAN COMMUNITY:

The European Community (EC) welcomes the paper on *Traceability and Food Labelling CL 2002/24-FL* prepared by Canada.

The EC considers traceability to be an important tool not only as a risk management measure related to food safety, but also as a measure facilitating the control and verification of labelling claims and thereby ensuring fair practices.

Apart from being a source of product identification, labelling is essential to provide consumers with information about products and so facilitating consumer choice.

The EC therefore concurs with Canada that the use of traceability to ensure fair practices in the food trade correlates to the prevention of deceptive practices as a legitimate objective described by the WTO Agreement to Technical Barriers to Trade.

The EC notes that there are already a number of Codex labelling texts that include tracing provisions with the objective of ensuring fair practices in food trade, by preventing deceptive practices as presented in the background paper by Canada. The EC further notes that many of these Codex standard requirements can only be effectively verified through systematic traceability based on paper documentation as no analytical methods are available.

The EC considers that traceability alleviates the burden and cost of testing, particularly for operators downstream in the production and distribution chain and also for public control and inspection bodies. Comprehensive traceability systems form part of many contractual relationships between operators to ensure the authenticity of labels and thereby reduce the need for verification through costly analytical methods.

Moreover, mandatory traceability requirements play an essential role in fraud prevention.

An adequate traceability system is also an important feature in quality production systems and voluntary schemes providing specific products to consumers, such as organic products, halal food etc.

The EC welcomes further discussion in the CCFL on traceability and food labelling with a view to identifying a more systematic approach to guarantee consumers and operators downstream in the production and distribution process the authenticity of labels and thereby ensure fair practices in trade. The EC considers that in achieving this objective, traceability at all stages of the production and distribution chain is a necessary tool.

The EC continues to consider that it is appropriate CCGP is entrusted with the development of a definition for traceability; that CCFICS is responsible for traceability related to food inspection and certification systems; and that CCFL deals with matters relating to traceability and labelling.