

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

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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)**

GOVERNMENT COMMENTS

COMMENTS FROM:

**BRAZIL
SPAIN**

**CONFEDERATION OF THE FOOD AND DRINK INDUSTRIES OF THE EU
(CIAA)
CONSUMERS INTERNATIONAL**

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

GOVERNMENT COMMENTS

BRAZIL:

Brazil considers premature the inclusion of this issue on the CCFL mandate, since there is not a precise definition on it and its relevance on this Committee. Moreover, we consider that the CCFL should wait for further discussions on the topic by CCFICS and CCGP, before beginning a new work.

Brazil pointed out that Traceability must be mainly considered as a tool for risk management. Mostly, it would work providing information related to the origin, processing and product placement.

Justification: In our point of view, we understand that the Codex General Standard For Labeling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 1-1991), particularly the items: 4.4-Name and Address; 4.5-Country of Origin and 4.6 Lot Identification, already establishes information which enables to trace the product through the label.

SPAIN:

The Kingdom of Spain agrees with the development of a document regarding traceability as it considers it an adequate tool to protect the health of the consumers and for risk management.

Taking in consideration that traceability is being addressed by several Committees, we are of the opinion that the Committee on General Principles should develop a base document regarding traceability for its application by other Codex Committees.

CONFEDERATION OF THE FOOD AND DRINK INDUSTRIES OF THE EU (CIAA):

CIAA is of the opinion that the subject of product traceability is of increasing importance and that it will become a general issue facing Codex.

However a discussion of the topic of labelling and traceability at this point in time seems premature, given that work in other committees, e.g. CCFICS, and also at ISO is not near to conclusion. A sequential approach to this topic is preferable. Other Committees should await the work of the CCGP and its general outline in order to ensure that they have a context for a general approach to take on the subject of traceability within the context of Codex Alimentarius. This will avoid differing approaches been taken within the various Committees.

Traceability is not an issue that needs to be discussed at CCFL in the near future. The discussion should be led by CCGP and if international standards are introduced, they should follow the approach taken by article 18 of Regulation (EC) 178/2002.

CONSUMERS INTERNATIONAL:

Introduction

Consumers International (CI) would like to take this opportunity to comment on the background paper prepared by Canada on Food Labelling and Traceability (CL 2002/24-FL). Our general view is that traceability needs to be examined rapidly by Codex, especially by CCGP, but that work in other committees, such as CCFL, will be very useful as well. Needless to say, the work should be coordinated, but this should not be interpreted as a mandate to delay the development of appropriate texts and specific guidance.

Consumers International has indeed approached traceability with an open mind, taking into account the different aspects that are relevant to consumers in both developed and developing countries. Moreover, we have advocated that governments and the food industry should consider traceability as a useful tool both to ensure fair practices in food trade and as a tool to protect the health of consumers. This, in Consumers International's view, assumes that **traceability should be used to ensure that labelling of foods is correct and truthful also at the point of purchase and/or at the point of consumption.** Traceability is useful to ensure that quality and identity of foods are preserved which gives many foods an added value. This is the reason why CI thinks CCFL needs to consider traceability within its mandate.

Terminology

We note that there is a consensus emerging about the terminology. Consumers International is encouraged by the language used at the CCFICS Working Group on Traceability. At its meeting in Fribourg, Switzerland, the term "**traceability/product tracing**" was used. Consumers International hopes this can be accepted also by CCFL and other committees.

We would also like to point out that the CCFICS Working Group outlined the result of its work (in Para 7):

". . . the Working Group considered the following possible elements with regard to traceability/product tracing": the ability to identify a food (product identification), how it was changed (if appropriate), where it came from and where it was sent (one step backward and one step forward) (product information) and the linkages between product identification and product information, while also noting that the applicability of these elements will depend on the objectives being pursued by the individual texts [of CCFICS documents]."

Examples

Examples of food labelling standards within Codex that include traceability (or traceability/product tracing) provisions assume that lot identification is communicated throughout the food production chain. We think there are a number of useful examples where traceability is used, including the ones mentioned by the document prepared by Canada (Pre-packaged foods, Organic foods, Bananas, Cheese etc.). In

addition, it should be pointed out that provisions of traceability are used in many other Codex texts, such as CCFICS texts on certificates, exchange of information in food control emergency situations as well as in the Principles for Food Import and Export Inspection and Certification (CAC/GL 20-1995).

Key to this is the concept that measures should be taken to assure the validity of certification. Consumers International strongly supports this concept also for **the labelling of foods at the point of purchase and/or at the point of consumption**. In our view, it would not be acceptable that the different actors at different steps of the food production and retail have assurances of the validity of certification, while the consumer who is expected to pay for (and ultimately eat the food) does not have such assurances.

Consumers International notes that the document prepared by Canada (point 11) discusses “preventing deceptive practices” as an element of the Codex objective of ensuring fair practices in the food trade.

While we agree that this is one important element, we would like to propose that the discussion should not be limited to “preventing deceptive practices”. Rather, CCFL should take the lead in defining traceability/product tracing also as a useful tool to encourage increased trust and confidence in the food trade, for example as **“preventing deceptive practices as well as promoting trade in foods of a legally defined and certified quality.”**

Finally, we do not believe that "ability to identify a food" should be taken to mean testing of the food, for example by sending samples to be checked in a laboratory. Consumers International thinks "ability to identify a food" should be taken to mean that bar codes and/or labels on the packaging is a sufficient way to identify a food and trace it throughout the food production chain. Although testing can be one useful way of identifying some foods, it should not be assumed that traceability/product tracing must rely on testing.

Consumers International would like to commend the authors for the paper, and hopes that CCFL will be able to agree on how to proceed with this important work.