CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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DISCUSSION PAPER ON DEVELOPING GUIDANCE ON TRACEABILITY/PRODUCT TRACING

Prepared by the United States and the United Kingdom

Background

The Codex *Procedural Manual* defines traceability/product tracing as "the ability to follow the movement of a food through specified stage(s) of production, processing and distribution" (Section I: Basic texts and definition). Traceability involves documenting and linking the production, processing, and distribution chain of food products and ingredients. In the case of a foodborne illness outbreak or contamination event, efficient product tracing helps government agencies, and those who produce and sell food, to rapidly find the source of the product and where contamination may have occurred. This enables faster removal of the affected product from the marketplace, reducing incidences of foodborne illnesses; and allows the removal to be targeted at those products identified as affected, thus managing the scale of removal, mitigating food waste and minimizing costs to producers and others in the supply chain.

Current status of traceability/product tracing in Codex

At CCFICS13 (2004), the Committee recognized the diverse views on the topic of traceability and identified a need to develop a set of principles around traceability in the context of a food import and export inspection and certification system. At CAC28 (2005), the new work proposal was adopted by the Commission. At CAC29 (2006), the Commission adopted the guideline, *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006).

The *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006) is a set of principles covering the context, rationale, design and application of traceability/product tracing as a tool for use by a competent authority within a food inspection and certification system. Among the principles identified in CXG 60-2006 is the approach of one step forward/one step back – food business operators should be able to identify the supplier of the food and the immediate recipient of the food.

Traceability is also included in other CCFICS documents. Traceability is included as an element of a key characteristic of a National Food Control System (NFCS) in the Codex *Principles and Guidelines for National Food Controls Systems* (CXG 82-2013). In this guideline, traceability is recognized as part of a NFCS's ability to be pro-active and identify existing or emerging hazards before they materialize as risks in the food production system.

Traceability is a topical issue for CCFICS25 and is referenced in the *Emerging Issues and Future Direction of CCFICS* discussion paper (CX/FICS 21/25/9) as well as the Food Fraud discussion paper (CX/FICS 21/25/8). However, the utility of traceability as a tool for use by regulators and the food industry is much broader than food fraud alone and so merits separate consideration by the Committee as traceability falls squarely within the remit of CCFICS.

Relevance in Codex and CCFICS

Codex standards, guidelines, and codes of practice contribute to protecting the health of consumers, ensuring fair trading practices and facilitating international trade in foodstuff. Having international (or Codex) guidelines related to traceability/product tracing will enhance the protection of consumers by facilitating the ability to trace and remove unsafe and mislabeled food from global commerce. Reliable traceability systems can also provide protection against deceptive and fraudulent practices in the food trade (See, Discussion paper on role of CCFICS with respect to tackling food fraud CX/FICS 21/25/8).

Establishing guidance around traceability/product tracing in CCFICS also provides for greater assurance to importing countries that imported food products meet food safety requirements because unsafe products can be more quickly identified and removed from the supply chain. Traceability also improves the effectiveness and/or efficiency of information that may be necessary in order to take actions that protect consumers

against foodborne hazards. Guidance can also help promote consistency, encourage interoperability and ensure traceability systems are accessible, proportionate and affordable to businesses of all sizes. Greater international adoption of end-to-end traceability facilitates identification of unsafe food products through the global food supply.

Need to update current Codex Guideline CXG 60-2006

The *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006) was developed in the mid-2000s and reflected the thinking of that time; however, it does not fully reflect current thinking or emerging practices in terms of available and affordable technology and considerations about public health protection and efficient use of resources. Increases in global trade, the complexity of supply chains, and digitization of information along with technologies to facilitate the integrity and sharing of such information suggest it would be timely to revisit the *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006) to ensure their scope and content are fit for purpose.

New approaches and benefits

End-to-end traceability[1] is an emerging approach currently being implemented by some food business operators driven by regulatory modernization, commercial interests, and consumer expectations. When implemented, this approach helps to better manage supply chain risks, reduce the harm to public health caused by foodborne illness outbreaks, and improve consumer confidence and trust. End-to-end traceability also limits adverse impacts on food business operators by providing a mechanism to efficiently trace the movement of contaminated food through the chain, identify and remove the food from the market, and develop mitigation strategies to prevent future contamination.

In addition to the public health protection gains from rapid identification of food associated with a food safety event, improved and more reliable traceability systems are important to industry and are an element of a well-constructed food safety plan; traceability can also be indicative of a good food safety culture. Traceability systems can provide early identification of affected food, which allows for targeted and specific actions to remove affected products from distribution channels, hence decreasing waste and lost revenue for entire markets or regions. Food business operators have begun to implement end-to-end traceability because it is beneficial from a business perspective and enhances supply chain controls. It also provides retailers with a system to notify those within their distribution chain that they may have received unsafe or substandard product. Efficient traceability enables the government and the food industry to react more quickly and strategically, thus preventing illnesses and reducing economic harm.

Greater traceability also benefits international trade; for example, focused identification of contaminated foods allows for more targeted responses by importing countries, limiting the number of food products impacted. This, in turn, can facilitate the trade of safe and legal products in global commerce.

Advances in technology can provide access to more affordable end-to-end traceability. The development of digital tools is critical to development of systems for traceability; however, the digital technologies rely on guidelines and standards to ensure different systems are able to talk to one another. Ensuring interoperability across systems will ensure regulators and industry are able to derive the maximum benefit for consumer protection and for facilitating trade.

Next steps

In light of current and emerging practices related to traceability the Committee is invited to set up an EWG to consider whether the *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006) need to be revised and updated. The EWG would report to CCFICS26 with their recommendations.

[1] End-to-end traceability refers to the ability to track and trace an object through its entire life cycle and through all parties involved in its production, custody, trade, transformation, use, maintenance, recycling or destruction. Traceability requirements may extend from all the way upstream (suppliers of raw materials, ingredients and components) to all the way downstream (customers of finished goods including end-consumers). Source GS1 Global Traceability Standard, Release 2.0, https://www.gs1.org/sites/default/files/docs/traceability/GS1_Global_Traceability_Standard_i2.pdf