



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

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PROJECT DOCUMENT

NEW WORK PROPOSAL FOR THE REVISION OF PRINCIPLES FOR TRACEABILITY/PRODUCT TRACING AS A TOOL WITHIN A FOOD INSPECTION AND CERTIFICATION SYSTEM (CXG 60-2006)

1. Purpose and Scope of the Standard

The purpose of the new work is to update CXG 60-2006 so that it takes account of developments since the original work completed in 2006. The content of the revised guidance is intended to serve as a resource that will help foster harmonization and increased regulatory coherence for traceability systems. The work will entail:

- Revision of the *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006)
- An update to the text to take account of current and emerging regulatory and industry good practices and advances in supporting technology, while remaining technology neutral.
- A refreshed structure to allow for additional content to be added (see Section 3 below).

The scope of the new work is to:

- Provide good practice advice, including key considerations that would promote/encourage interoperability between systems.
- Extend the use of traceability/product tracing to the whole and/or parts of the National Food Control System (NFCS)¹.
- Provide guidance on the roles and responsibilities of the different actors/stakeholders involved in the production, processing, distribution, transport, and retail sale of food or ingredients.

2. Relevance and Timeliness

It is good practice for Codex Committees to keep their standards under review to ensure they remain relevant and fit for purpose. The traceability guidelines were finalized seventeen years ago and reflect customs and practices prevalent at that time. The guidelines do not therefore fully reflect current thinking and modern approaches to traceability that have emerged since adoption. These new and emerging approaches are being driven by regulatory modernization programs and a desire from industry to innovate so that they have increased visibility along their supply chains which helps them better manage risks and meet consumer demands. The 2006 guidelines did not foresee these changes which means these new and emerging approaches to traceability are not fully accommodated in the current Codex text.

Traceability is recognized more so now than it was in 2006 as a foundational component of a modern, well-designed NFCS alongside the good hygiene practices set out in CXC 1-1969. This recognition became apparent during the development of the NFCS guidelines (*Principles and Guidelines for National Food Control Systems*, CXG 82-2013) which identify traceability as a main characteristic of an effective control system. As a tool, traceability provides valuable information to link the different stages of a product's journey from farm to fork. Traceability information, how it is kept, and ease of access is often critical when the food safety of a product is compromised. A critical characteristic of these new/modern systems is interoperability with existing systems and the use of common data standards. However, the value to control systems goes beyond just managing food safety recalls/incidents. Innovation and the availability of more affordable technology has seen businesses voluntarily implement enhanced traceability systems which are beneficial to public health and

¹ Principles and Guidelines for National Food Control Systems, CAC/GL 82-2013

better serve the needs of businesses and regulatory authorities, by providing increased visibility along supply chains which in turn allows for the more efficient use of both business and regulatory resources. In reality, the better a traceability system is the more surgical the regulatory intervention can be, saving time, reducing waste, and minimizing costs to affected businesses.

In light of the changes that are already occurring in the food system, it would be timely for Codex to revise and update CXG 60-2006 to avoid the risk of fragmentation by providing a practical resource that can help foster harmonization and increased regulatory coherence. Further, increases in global trade, the complexity of supply chains, and digitization of information along with the emergence of more affordable technologies to facilitate the integrity and sharing of food chain information suggest now is the right time to revisit the 2006 text.

3. Main aspects to be covered

The revised guidance will be based on CXG 60-2006. The proposed structure and content will cover the following aspects:

- Preamble (new – combine context and rationale text from CXG 60-2006)
- Scope (revise to incorporate whole of NFCS, as well as for use within national boundaries)
- Definitions (revisit and update, as appropriate, from CXG 60-2006)
- Principles (retain 1up/1down, revise/supplement, as appropriate from CXG 60-2006)
- Roles and responsibilities (new, Competent Authorities, FBOs)
- Regulatory frameworks (combine with “Design” paragraph from CXG 60-2006 and add “key considerations” to retain flexibility)
- Good practice (combine with “Application paragraphs from CXG 60-2006 and supplement to cover new/emerging approaches, including the role that data standards play in enabling interoperability).

4. An assessment against the *Criteria for the Establishment of Work Priorities*

General Criterion

Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs of developing countries.

The proposed new work will support competent authorities in the development of traceability/product tracing systems that can more rapidly identify products that can adversely impact consumer health because of food safety concerns, which in turn will help minimize risks. It will also promote consistency and harmonization of approaches between countries, thus facilitating communication about food safety concerns, while allowing for sufficient flexibility to consider different levels of capacity and development in different countries. Updated international guidelines will also provide greater clarity and certainty for food businesses.

Criteria applicable to general subjects

(a) Diversification of national legislations and apparent resultant or potential impediments to international trade.

Lack of standardization around traceability/product tracing can hinder rapid responsiveness, which is especially important in situations where public health can be impacted. Updating the Codex guidance so that it is inclusive of current and emerging traceability practices would provide a common framework for a harmonized approach between NFCS and in doing so help prevent fragmentation.

(b) Scope of work and establishment of priorities between the various sections of the work.

Refer to scope section above.

(c) Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies).

Work is being done in this area related to data standards by organizations such as U.N. Center for Trade Facilitation and and Electronic Business (UNCEFACT) and World Customs Organization (WCO).

(d) Amenability of the subject of the proposal to standardization.

Codex currently has a principles document in this area. The proposed work would consider revisions to the existing guidance. Standardization in the area of traceability/product tracing that is inclusive of new and emerging approaches will help facilitate communication between trading partners.

(e) Consideration of the global magnitude of the problem or issue.

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, e.g., contain relevant and up-to-date good practice considerations on regulatory and industry practices.

5. Relevance to the Codex strategic objectives

The proposed work is directly related to the purposes of the Codex Alimentarius Commission. Namely, goals one and five of the Codex Strategic Plan 2020-2025, to “Address current, emerging and critical issues in a timely manner” and to “Enhance work management systems and practices that support the efficient and effective achievement of all strategic plan goals.” This work is relevant to Strategic Objective 1.2, “Prioritize needs and emerging issues.”

6. Information on the relation between the proposal and other existing Codex documents as well as other ongoing work

In addition to the existing guidance, *Principles for Traceability / Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006), this work will consider existing Codex texts such as *Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations* (CXG 19-1995), *Principles and Guidelines for National Food Control Systems* (CXG 82-2013), and *Principles and guidelines for the exchange of information between importing and exporting countries to support the trade in food* (CXG 89-2016), and the *General Principles of Food Hygiene* (CXC 1-1969).

It will also be important to keep in view related work in other international standard setting bodies, e.g., UNCEFACT, and the WCO to ensure coherence in approach so as not to undermine efforts to encourage interoperability through common data standards. (e.g., <https://www.wcoomd.org/DataModel>)

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

Not required.

8. Identification of any need for technical input to the standard from external bodies so that this can be planned for

Not required at this time

9. Proposed timeline for completion of the new work, including the start date, the proposed date for adoption at Step 5, and the proposed date for adoption by the Commission; the time frame for developing a standard should not normally exceed five years.

Subject to the Codex Alimentarius Commission approval at its 46th Session in 2023, the goal is to complete the new work in two CCFICS sessions or three years, depending on the future schedule of CCFICS meetings.