



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS**

**Twenty-Sixth Session**

**Hobart, Tasmania, Australia**

**1 - 5 May 2023**

**DISCUSSION PAPER ON REVIEW AND UPDATE OF THE *PRINCIPLES FOR TRACEABILITY/PRODUCT TRACING AS A TOOL WITHIN A FOOD INSPECTION AND CERTIFICATION SYSTEM (CXG 60-2006)***

(Report prepared by the Electronic Working Group<sup>1</sup> chaired by the United States and co-chaired by the United Kingdom)

**Executive Summary**

CCFICS25 agreed to set up an EWG, co-chaired by the USA and UK, to consider whether the current Codex guidelines on traceability remained fit for purpose. The co-chairs consulted the EWG participants in 2022 through a series of questions used to gather their views on current and emerging approaches to traceability. The co-chairs were also keen to understand whether the content/structure of the 2006 guidelines sufficiently met members expectations.

The EWG participants' comments and the Co-Chairs' analysis can be found at Appendix II.

Whilst EWG participants remained largely supportive of the 2006 text some content gaps were identified and most suggested the text would benefit from following the structure of recently adopted CCFICS texts. In addition, most felt the text would benefit from advice on good practice, including on some of the challenges identified by members, such as data standards as this would help enable interoperability between systems. Other challenges identified included the potential costs of new technology and the capability and capacity of small businesses to implement enhanced traceability systems. EWG participants were keen to avoid prescription to allow and maintain flexibility.

The Co-Chairs recommendations for next steps are:

1. CCFICS26 to host a traceability lunchtime seminar to build understanding ahead of the Committee discussion.
2. CCFICS26 to consider the merits of undertaking new work to revise and update the existing *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System (CXG 60-2006)*.
3. Subject to the outcome of the discussion, a new work proposal will be drafted for consideration by CCFICS26.

**INTRODUCTION & BACKGROUND**

1. During the 25th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS25), 31 May – 8 June 2021, the Committee considered a paper prepared by the United States and the United Kingdom to revisit the existing guidance on Traceability/Product Tracing to ensure the scope and content are fit for purpose. Although the time available for a discussion during CCFICS25 was very limited, there was general agreement among Members that traceability was an important topic and that it would be useful to have a more in-depth discussion at CCFICS26.

<sup>1</sup> Argentina, Australia, Botswana, Brazil, Canada, Cuba, Ecuador, Estonia, EU, Food Industry Asia, FoodDrink Eu-rope, France, GFSI, Guatemala, IAF, ICBA, ICGA, IFFA, IFT, Indonesia, Iran, ISDI, Japan, Kenya, Malaysia, Maroc, Mexico, Netherlands, New Zealand, Nigeria, Norway, Panama, Peru, Republic of Korea, Sierra Leone, Singapore, Spain, Sweden, Switzerland, Thailand, United Kingdom, Uruguay, United States of America

## TERMS OF REFERENCE

2. CCFICS25<sup>2</sup> agreed that an electronic working group (EWG), co-chaired by the United States and the United Kingdom, should 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, and for the EWG to report to CCFICS26 with their recommendations. The Committee also acknowledged that it would be helpful to gather information from Food Business Operators (FBOs) about the technology platforms they were using to better understand how the use of emerging technologies can enhance traceability systems. The EWG was tasked with developing a discussion paper on traceability and a possible project document to be presented at CCFICS26.

## PARTICIPATION AND METHODOLOGY

3. In total, 34 Members and 9 Observer organisations registered as participants of the EWG. The EWG used forum.codex-alimentarius.net as a platform for seeking input and discussion on traceability and product tracing. A detailed list of participants is contained in Appendix III to this EWG Report.

4. The EWG started its work in December 2021 when the EWG participants received a questionnaire prepared by the EWG Co-Chairs:

- a. What do you consider as the role of Codex principles and guidance in the area of traceability/product tracing?
- b. What challenges do countries face in implementing systems for traceability/product tracing? Please describe current practices in your country.
- c. Which of these challenges identified in Question 2 should be addressed in Codex guidelines?
- d. What information is important to include in a guideline on traceability/product tracing? Is the format/structure of the current text logical and helpful to the reader?
- e. What characteristics or elements are important in a traceability/product tracing system to enhance communication/information sharing between countries? Are these adequately covered in the current text?

5. Based on feedback from the EWG, the discussion paper was developed.

## SUMMARY OF DISCUSSION

6. EWG Members confirmed that traceability remained an important and critical component of national food control systems (NFCS) beyond just the inspection and certification system. There was also broad agreement among EWG Members that it would be helpful for the Codex guidance on traceability to include information about the roles and responsibilities of different parties within the food system and for the guidance to provide for flexibility while embracing best practices and the use of emerging and supportive technologies. In addition, Members expressed the view that the format of newer CCFICS texts appeared more suitable as this would allow for the inclusion of such information, and other relevant supplementary information on, for example, best practices.

7. Members identified a number of challenges to the modernization of traceability systems related to:

- a. availability and cost of technology solutions;
- b. differences in capability and capacity, especially for small FBOs;
- c. interoperability between systems;
- d. lack of common data standards; and
- e. security of information.

8. Members further commented that while it may not be appropriate to address all of these challenges within the context of a Codex guidance text, it would be useful to review CXG 60-2006 to consider where updated guidance would be helpful in addressing some of the practical issues.

9. In response to the question related to characteristics of a food traceability system, Members identified a number of areas not covered in the current guideline as potential areas for further discussion. Examples include the usefulness of interoperability, identification of contact points, and standardization of data elements.

10. EWG responses and the Co-Chair's analysis can be found at Appendix II.

---

<sup>2</sup> REP21/FICS, Paragraph 114 v

**RECOMMENDATIONS**

11. It is proposed that:
  - a. CCFICS 26 to host a traceability lunchtime seminar to build understanding ahead of the Committee discussion.
  - b. CCFICS 26 to consider the merits of undertaking new work to revise and update the existing *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006), taking account of the views expressed by EWG participants.
  - c. Subject to the outcome of the discussion, a new work proposal will be drafted for consideration by CCFICS26.
12. A discussion paper is provided as Appendix I to this report.

**APPENDIX I****DISCUSSION PAPER ON TRACEABILITY/PRODUCT TRACING AS A TOOL WITHIN A FOOD INSPECTION AND CERTIFICATION SYSTEM****Background**

1. In 2006, Codex adopted the guidance *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006). Since the document was adopted in 2006, there has been a growing realization of the importance of traceability and the critical role it plays in supporting national food control systems (NFCS). The 2006 guidance established the design principle of one step forward and one step back, which is now a widely adopted requirement in most regulatory food control systems. However, some industry sectors and governments are responding to the increased risks in food supply chains by harnessing emerging technologies to modernize their traceability systems. When implemented, these enhanced traceability systems enable rapid identification of the source of a problem in a supply chain, which in turn means corrective actions are more proportionate to the extent and severity of the problem.
2. During the 25th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS25), 31 May – 8 June 2021, the Committee considered a paper prepared by the United States and the United Kingdom to revisit the existing Codex guidance to ensure the scope and content are fit for purpose. Although the time available for a discussion during CCFICS25 was very limited, there was general agreement among Members that traceability was an important topic and that it would be useful to have a more in-depth discussion at CCFICS26.
3. CCFICS25 agreed that an electronic working group (EWG), co-chaired by the United States and the United Kingdom, should consider whether the principles for traceability and product tracing as a tool within a food inspection and certification system need to be revised and updated, and for the EWG to report to CCFICS with their recommendations. The Committee also acknowledged that it would be helpful to gather information from Food Business Operators (FBOs) about the technology platforms they were using to better understand how the use of emerging technologies can enhance traceability systems. The EWG was tasked with developing a discussion document on traceability and a possible project document to be presented at CCFICS26.
4. Thirty-four (34) Members and nine (9) observers and international organisations registered as participants of the EWG. The EWG used [forum.codex-alimentarius.net](http://forum.codex-alimentarius.net) as a platform for seeking input and discussion on traceability and product tracing.

**Discussion**

5. The Codex Procedural Manual (PM) 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).
6. Traceability involves documenting and linking the production, processing, and distribution chain of food products and ingredients.
7. Having a robust traceability system that is able to provide reliable information and data about a food and/or any of its ingredients, as well as associated process steps, is a cornerstone of a well-functioning NFCS. 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.
8. Better and more efficient traceability systems can benefit international trade; for example, focused identification of contaminated foods allows for a more targeted response by importing countries, limiting the number of food products that may otherwise be impacted. This, in turn, can facilitate the trade of safe and legal products in global commerce. Traceability systems can also help increase transparency and confidence in the safety, quality and provenance of food by importing countries, thus facilitating trade and potentially adding value for buyers/sellers.
9. Efficient traceability systems can also allow for proactive, rather than reactive, identification, of affected food, which can help guide targeted and specific actions to remove affected products from distribution channels before problem escalates, hence decreasing waste and lost revenue for entire markets or regions.
10. Robust traceability systems can also act as a deterrent to fraudulent activity in food supply chains, and a source of evidence to support investigations when fraudulent activity is suspected or has taken place.

## Emerging practices and technologies

11. The application of new technology is facilitating greater traceability within food systems by enabling quicker access to food chain information, some of which may be near real-time. These modern technologies can prove to be accessible and cost effective, and indeed can allow implementors to leapfrog many of the challenges and additional costs of adapting legacy systems. It is also evident that the development of digital tools is driving this development across food systems in response to increased risks in supply chains and the role enhanced traceability can play in managing and responding to those risks. However, for this to work, the digital technologies rely on guidelines and standards to ensure that different systems are able to communicate with one another across the food system. Ensuring interoperability across systems is key as it enables regulators and industry to derive maximum benefit in relation to consumer protection and facilitating trade. The purpose of interoperability is to allow data to be exchanged across different systems without the need for everyone to be on the same operational, or proprietary, technology platform.

12. Recognizing the benefits for managing risks in their supply chains, some FBOs have begun implementing end-to-end traceability systems to give them easier and faster access to relevant information. These early adopters are well placed to respond to market demands and future regulatory requirements, while also benefiting from enhanced supply chain management controls and other efficiencies that align with their food safety culture. 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.

13. Service industries are helping businesses enable interoperability across different software platforms through the use of common identifiers which provide the link to traditional centralized databases or distributed ledgers. Product identifiers take the form of product codes and may present as quick response (QR) or bar codes. Technology solutions can offer additional layers of security with a thread of information that creates a digital footprint of a product to its physical journey across the supply chain. However, challenges remain as interoperability between different systems relies on the use of common product identifiers and data standards by users that input data at different entry points. Additionally, data sharing agreements may be needed to provide a robust governance mechanism that enables data to be shared across a supply chain by providing the necessary assurances on data protection and security.

## Current status of traceability/product tracing in Codex

14. CCFICS13 (2004) 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 approved by the Commission, and at CAC29 (2006), the guideline *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006) was adopted.

15. 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 – FBOs should be able to identify the supplier of the food and the immediate recipient of the food.

16. Traceability is also included in other CCFICS documents. Traceability is included as an element of a key characteristic of a 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.

17. Traceability was a topical issue at CCFICS25 and was referenced in the Emerging Issues and Future Direction of CCFICS discussion paper (CX/FICS 21/25/9) as well as the discussion paper on role of CCFICS with respect to tackling food fraud (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

18. Codex standards, guidelines, and codes of practice contribute to protecting the health of consumers, ensuring fair food trading practices and facilitating international trade in foodstuff. Having updated 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).

19. 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**

20. The *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006) guideline 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.

21. It should be noted that the intention of the one step forward/one step back design principle is to facilitate traceability along the entire supply chain. In theory this means regulators (and FBOs) are able to construct supply chains from end-to-end. In practice the reality may be very different as the longer and more complex a supply chain is, which is increasingly more common, the harder and more time consuming this task becomes. The chain can sometimes break which may then lead to the scope of affected products being widened until more information is found. Modern approaches to traceability seek to address this problem by ensuring interoperability between what may be quite different systems used for record keeping by different actors at different stages in the supply chain.

22. It is timely to consider updating the Codex guideline CXG 60-2006 as there is currently no international guidance against which to benchmark systems to help foster interoperability. While remaining technology neutral, defining key elements to facilitate traceability can be important to maximize data usability.

23. As part of the EWG consideration process, a questionnaire was distributed to EWG Members seeking their input on five questions. These are provided below.

#### **EWG questions:**

- a. What do you consider as the role of Codex principles and guidance in the area of traceability/product tracing?
- b. What challenges do countries face in implementing systems for traceability/product tracing? Please describe current practices in your country.
- c. Which of these challenges identified in Question 2 should be addressed in Codex guidelines?
- d. What information is important to include in a guideline on traceability/product tracing? Is the format/structure of the current text logical and helpful to the reader?
- e. What characteristics or elements are important in a traceability/product tracing system to enhance communication/information sharing between countries? Are these adequately covered in the current text?

#### **Responses from the EWG and co-chair summary is presented as Appendix II to the EWG report.**

#### **Recommendation**

28. It is proposed that:

- a. CCFICS 26 to host a traceability lunchtime seminar to build understanding ahead of the Committee discussion.
- b. CCFICS 26 to consider the merits of undertaking new work to revise and update the existing *Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System* (CXG 60-2006), taking account of the views expressed by EWG participants.
- c. Subject to the outcome of the discussion during CCFICS26, a new work proposal will be drafted for discussion by CCFICS26.

**APPENDIX II****EWG QUESTIONNAIRE AND RESPONSES**

Compilation of EWG Members' comments on five initial questions and the Co-Chair's summary of their responses

<b>General comments</b>	
<b>Australia</b>	Australia thanks the Co-Chairs of the Electronic Working Group (EWG) for developing the below questions and appreciates the opportunity to provide comments. Australia acknowledges that responses to the below questions will be used to formulate the first draft discussion paper. Australia supports further discussion on whether or not the principles for product tracing/traceability need revision or expansion to include more prescriptive guidance.
<b>Morocco</b>	Morocco thanks USA & Australia for the work done for the proposal of this document submitted for the opinion of the members of the said EWG.
<b>International Accreditation Forum (IAF)</b>	IAF Food Working Group would like to thank the Chair, Co-Chairs and EWG members for their work on this discussion paper.
<b>International Council of Beverages Association (ICBA)</b>	The ICBA is pleased to submit these comments on the above issue for consideration. These comments are in response to the relevancy and scope inquiries around the discussion paper on developing guidance on traceability that is to be part of the revision of The Principles for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification system (CXG 60-2006) proposed by the designated EWG. ICBA fully supports CCFICS advancing this important new work. We thank you for this opportunity to provide ICBA perspectives on the above-noted matters, and respectfully ask that they be given careful consideration as the EWG develops the corresponding report.

<b>Question 1</b>	
<p><b>What do you consider as the role of Codex principles and guidance in the area of traceability/product tracing?</b></p> <p><i>For example, to:</i></p> <ul style="list-style-type: none"> <li>• <b>Clarify the different actors and their roles and responsibilities</b></li> <li>• <b>Identify the practical issues to be addressed and the benefits of an effective traceability system</b></li> <li>• <b>Provide guidance on approaches to traceability that consider current and emerging practices to future proof the text</b></li> </ul>	
<b>Australia</b>	<p>The role of Codex principles and guidance in the area of traceability and product tracing is to provide useful and practical guidance for all competent authorities, in using traceability as part of their National Food Control System (NFCS). Such guidance should be flexible enough to support both governments and industry in utilising traceability as a tool, but not be overly specific as to mandate a particular approach. Mandating specific approaches to traceability may result in some industries and/or developing countries not being able to utilise guidance within their NFCS, irrespective of commercial developments within their own countries.</p> <p>Australia would support further discussion on whether the principles and guidelines need to be adjusted to identify practical issues to be addressed and the benefits of an effective traceability system. Australia recognises the practical issues affecting effective traceability systems, including fragmented systems that can hinder data-led traceability and more recently, COVID-19 related disruptions which have resulted in the significant increase in traceability and credential demands. As such, Codex guidance when developed should, as much as practically possible, consider emerging practices to support safe food trade.</p>
<b>Canada</b>	<p>Canada supports the following proposed examples:</p> <ul style="list-style-type: none"> <li>• <i>Clarify the different actors and their roles and responsibilities</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>Identify the practical issues to be addressed and the benefits of an effective traceability system</i></li> <li>• <i>Provide guidance on approaches to traceability that consider current and emerging practices to future proof the text</i></li> </ul> <p>In addition, Canada proposes the following:</p> <ul style="list-style-type: none"> <li>• To be utilized as a tool within a food inspection and certification system in order to contribute to the protection of consumers against food-borne hazards and deceptive marketing practices and the facilitation of trade on the basis of accurate product tracing.</li> <li>• To identify best practices and provide guidance on practical approaches for all foods in a fair and consistent manner domestically and internationally.</li> </ul>
<b>European Union (EU)</b>	<p>All of the above elements are important to address when developing further Codex guidance on traceability.</p> <p>It is now widely recognized, including in CXG 82-2013, that traceability systems are an essential part of effective national food control system as they allow for timely identification of the sources for emergencies and effective recall of affected products. Traceability is also important for the control food fraud.</p> <p>Traceability should cover the entire food chain, i.e. it should allow to trace back and forth all the movements of food, feed and food-producing animals through all stages of production, processing and distribution.</p>
<b>India</b>	<p>Codex document on Traceability need to be a comprehensive document indicating characteristics of well- functioning traceability system of one step up &amp; one step down principle, so that every player of the system is in position to respond (should be able to maintain records and provide information) appropriately in a food safety violation. Therefore, the guidance needs to cover all the possible stakeholders in the food chain, benefits and challenges of the traceability system and different options/approaches available for traceability.</p>
<b>Japan</b>	<p>To facilitate finding the source of the product and where contamination may have occurred in the case of a foodborne illness outbreak or contamination event.</p> <p>To expedite removal of the affected product from the marketplace, and to reduce incidences/cases of foodborne illnesses.</p>
<b>Mexico</b>	<ul style="list-style-type: none"> <li>• The current Guidelines provide guidance on the minimum elements of a traceability system applied in food inspection and certification systems. However, it is necessary to broaden the scope of application to include the use of said tool in the National Food Control Systems (NFCS), which include inspection and certification systems.</li> <li>• For the above, it is important to define the responsibilities and roles of the different actors involved (competent authorities, operators of the food industry from primary production to distribution and sale to the consumer, as well as consumers). Mainly in developing countries, since it must be possible to define the minimum elements that guarantee information and that it is accurate and verifiable</li> <li>• The capacities of the authorities and of small and medium-scale companies must be considered, as well as those involved in the transport of food and food products, including intermediaries (brokers).</li> <li>• The different tools for the application of traceability must be recognized, from the most basic (based on paper records and the labelling of products), to the most advanced technologies available, which allow integrating the history of a product through codes and other tools.</li> <li>• The compatibility of the technological tools used for the identification of goods and their traceability must be considered.</li> </ul>
<b>Morocco</b>	<p>Morocco agrees with the three point proposed as areas of traceability/product tracing. However, other points deserve special attention:</p> <ul style="list-style-type: none"> <li>• Maintain the uses both product tracing and food traceability interchangeably.</li> </ul>

	<ul style="list-style-type: none"> <li>• The new work must evolve the states of Codex that the traceability is one <b>tool</b> “within a food inspection and certification system towards the concept of “traceability System” (TS);</li> <li>• Identifies more than the two drivers or uses of traceability fixed by Codex (CXG 60-2006): One pertains to food safety, and the other relates to authenticity. Morocco proposes to explore the following additional drivers: <ul style="list-style-type: none"> <li>○ Traceability helps improve operational efficiency</li> <li>○ The visibility that accompanies traceability allows us to communicate information customers are asking for</li> <li>○ Sharing information between actors and identifying products lots and batches.</li> </ul> </li> </ul>
<b>Nigeria</b>	<ul style="list-style-type: none"> <li>• To identify the key stakeholders in food/product traceability/tracing</li> <li>• Provide necessary information for developing guidelines and procedures on traceability/product tracing</li> <li>• To facilitate trade at international, regional and national levels</li> <li>• To provide a level playing ground for all actors in order to minimize technical barriers to trade</li> <li>• To develop guidelines and procedures for both importing country and exporting country</li> </ul> <p>Identify the strengths, weaknesses, opportunities and threats in traceability/product tracing and proffer solutions where necessary</p>
<b>Norway</b>	<p>This could be a timely guidance document for CAs as well as for food business operators (FBOs) worldwide and would be useful in the context of withdrawal/recall of unsafe food. It could also be a helpful tool in deciding upon correct labelling and in situations where food fraud is “investigated”.</p> <p><i>For example, to:</i></p> <ul style="list-style-type: none"> <li>• <i>Clarify the different actors and their roles and responsibilities</i> <ul style="list-style-type: none"> <li>○ Yes, current text is not going into details on different roles and responsibilities, however this would be helpful</li> </ul> </li> <li>• <i>Identify the practical issues to be addressed and the benefits of an effective traceability system</i> <ul style="list-style-type: none"> <li>○ Yes, identification of who you are buying from and who you are selling to, as well as internal traceability: identification of the consignment (splitting and/or merging consignments), dates and amount (weight/volume).</li> <li>○ Collecting data, provide documentation (food business owners).</li> </ul> </li> </ul>
<b>Peru</b>	Provide guidance on approaches to product traceability, in order to avoid deceptive practices (such as products of origin) and facilitate trade in them.
<b>Republic of Korea</b>	While maintaining harmony and consistency with existing guidelines, provide a set of principles and methods to enable competent authorities to use traceability/product traceability to protect consumers and facilitate fair practices in food trade.
<b>Singapore</b>	<p>The Codex principles and guidance can assist to:</p> <ul style="list-style-type: none"> <li>• Clarify the roles and responsibilities of various actors throughout the supply chain</li> <li>• Communicate the need for effective traceability systems</li> <li>• Provide guidance on minimum requirements for effective traceability systems</li> <li>• Provide guidance on effective communication and use of traceability information in times of food safety incidents</li> <li>• Provide guidance on approaches to traceability that consider current and emerging practices and practical challenges to future-proof the text.</li> </ul>
<b>Spain</b>	All of them.

<p><b>United States of America (USA)</b></p>	<p>Clarification of roles and responsibilities and defining expectations around the traceability of food product imports/exports is important, though Codex should not be too prescriptive in the guidance. Providing a framework that allows flexibility to provide the appropriate data that is needed without resorting to a specific system solution would be optimal. As an example:</p> <ul style="list-style-type: none"> <li>• Outline the minimum requirements for traceability .</li> <li>• Bring attention to challenging areas of traceability to ensure these are handled appropriately .</li> <li>• Provide guidance on best practices that can be applied to all business models that can be tailored to any type of food manufacturer, regardless of the size of operation.</li> </ul>
<p><b>Uruguay</b></p>	<p>UY agrees with:</p> <ul style="list-style-type: none"> <li>• <i>Clarify the different actors and their roles and responsibilities</i></li> <li>• <i>Identify the practical issues that need to be addressed and the benefits of an effective traceability system</i></li> <li>• <i>Provide guidance on traceability approaches that consider current and emerging practices to prepare the text for the future.</i></li> </ul> <p>In addition, it is considered important:</p> <ul style="list-style-type: none"> <li>• Clarify the role of traceability in the certification process , in the recall and in the prevention of food fraud.</li> <li>• Clarify the components of a food traceability system.</li> </ul>
<p><b>Food Industry Asia (FIA)</b></p>	<p>We believe that the role of this guidance is to serve as a basis for establishing and/or enhancing food traceability systems in local markets to support food safety and public health goals, while ensuring fair trading practices and facilitating international trade in foodstuffs.</p> <p>Our comments in addition to what was mentioned above are as follows:</p> <ul style="list-style-type: none"> <li>• Establish requirements for a minimally viable traceability business process that supports appropriate data sharing beyond 1-up and 1-down across the value chain, e.g., unique class-level product identification with a minimum of batch/lot variable data with key data elements captured at critical tracking events as product moves across the supply chain.</li> <li>• Provide guidance on <b>technology-agnostic and global standards-based</b> approaches to traceability that consider current and emerging practices to future proof the text.</li> </ul>
<p><b>IAF</b></p>	<ul style="list-style-type: none"> <li>• PRINCIPLES FOR TRACEABILITY CAC/GL 60-2006 is focused on the 'competent authority'. Any revision should also consider other interested parties such Food Business Operators (FBOs) and consumers by clarifying their roles in a food traceability system.</li> <li>• Including other interested parties would help harmonize traceability requirements with government, corporate and other institutional traceability mandates to streamline cost, effort and compliance and optimize the likelihood of success across all initiatives, e.g. traceability to support concurrent food safety, sustainability, fair trade, human rights and other social policies or programs.</li> <li>• Definitions needed for 'traceability', 'transparency' and 'chain of custody' with explanation on the differences.</li> <li>• Terms and definitions must be aligned to international standards such as ISO 22005 and ISO 22095 (for traceability definitions) and ISO 17000 (for conformity assessment and certification definitions) to ensure a common vocabulary.</li> <li>• When referencing standards, Codex must make the distinction between international standards (voluntary consensus) and private standards (consortia) that are used for traceability. With Codex making a strong recommendation to follow international standards (voluntary consensus) where available, established and applicable.</li> <li>• Codex principles must align with ISO 22005 clause 4.2 Principles. To ensure consistency between international standards:</li> </ul>

	<ul style="list-style-type: none"> <li>○ verifiable,</li> <li>○ applied consistently and equitably,</li> <li>○ results oriented,</li> <li>○ cost benefit,</li> <li>○ practical to apply,</li> <li>○ in compliance with any applicable regulations or policies,</li> <li>○ compliant with defined accuracy requirements.</li> </ul> <ul style="list-style-type: none"> <li>● Codex guidance to consider alignment with ISO 22005 clause 5.5.3 Information requirements for consistency between international standards.</li> <li>● Codex guidance must be outcomes focused, and should consider defining expected outcomes. Avoiding overly prescriptive guidance and being too narrow on traceability technologies.</li> <li>● ISO 22005 is under review. This could mean revision process is triggered in 2022, ISO guidance must be mutually inclusive with Codex guidance, and Codex principles and guidance should not be updated without consideration to ISO 22005.</li> </ul>
<b>ICBA</b>	ICBA believes it is to serve as a basis for establishing and/or enhancing food traceability systems in local markets and support food safety and public health goals.

### **Co-chairs' summary of key points**

There was broad agreement amongst EWG Members that it would be helpful for Codex guidance on traceability to include information about the roles and responsibilities of the different actors and to illustrate the key components of an effective traceability system in a way that reflects both current and emerging best practices.

In other comments, Members:

- Suggested the guidelines should be outcome focussed rather than prescriptive
- noted that traceability was integral to the whole of a NFCS and went beyond just inspection and certification systems
- were keen to ensure that any guidance should align with existing Codex texts and take account of other relevant international standards
- pointed to the potential benefits of a modern well-functioning traceability system

Members also identified a number of challenges on which they elaborated further when answering to question 2 (below).

### **Co-chairs' reflections**

This question sought to understand members views on what they saw as the role of Codex guidelines on traceability in order to consider whether current expectations matched the content of GL 60-2006. The key points highlighted above suggest members see scope for improving the 2006 text.

### **Question 2**

**What challenges do countries face in implementing systems for traceability/product tracing? Please describe current practices in your country.**

*For example,*

- ***Capacity and capability (e.g., fraud investigation may require forensic skills/techniques)***
- ***Collection and storage of traceability information, including ownership of data***
- ***Speed of access and accuracy of data that is kept and made available, which can be critical in outbreaks with serious public health risks***
- ***Availability and cost of technology to industry and regulators***

<b>Australia</b>	<p>The domestic challenges that a country may face in implementing systems for traceability/product tracing might include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Difference in the level of sophistication of traceability systems across the food businesses.</li> <li>• Limited opportunities for system interoperability due to siloed approaches across jurisdictions and the food sector to traceability/product tracing data capture and storage.</li> <li>• A lack of consensus amongst food businesses on technology-enabled traceability solutions and fragmented approaches to data standards, sensors, storage systems and tracking technologies.</li> <li>• A gap in the understanding of the challenges and opportunities offered by enhanced traceability/product tracing.</li> <li>• The ability of food businesses in remote locations to access technologies and the internet to facilitate more timely participation in modern traceability systems.</li> <li>• Financial constraints that prohibit producers and other supply chain participants from implementing new technologies to enhance traceability/product tracing systems.</li> </ul>
<b>Canada</b>	<p>Canada supports the following proposed examples:</p> <ul style="list-style-type: none"> <li>• <i>Capacity and capability (e.g., fraud investigation may require forensic skills/techniques)</i></li> <li>• <i>Collection and storage of traceability information</i></li> </ul> <p>Additional challenges that countries may face include:</p> <ul style="list-style-type: none"> <li>• Determining which traceability standard could be implemented effectively domestically, internationally and for all foods.</li> <li>• Availability/interoperability of systems, and cost of technology to industry in particular small businesses.</li> <li>• Variations in the national food control system infrastructure, legislative authorities, and division of responsibilities between different levels of government may pose challenges in implementing comprehensive traceability systems.</li> <li>• Effective and efficient coordination and cooperation between all levels of government and between trading countries' competent authorities.</li> <li>• Speed of access and accuracy of data that is kept and made available, which can be critical in outbreaks with serious public health risks . For example interoperability of data requirements (e.g. same/different terms to describe the same/different things – lot code vs. product code vs. serial number). Common understanding of terminology is important, within a country and at the international level.</li> </ul>
<b>EU</b>	Increasingly complicated global food supply chains are a common challenge for all countries.
<b>India</b>	<p>We do have recall procedure regulation and guidelines which includes traceability. However, there is no particular advanced technologies prescribed there. Advanced technological and record-keeping capabilities are challenges in implementation of traceability and small scale stakeholders in the chain are the most sufferer. Sometime raw material produced by small producers is collected at intermediary level e.g. milk from different farmers collected at collection center/chilling center and traceability is a challenge during such mixing. Technologies like Block Chain are getting popular these days in traceability however importance of collection and input of accurate, reliable data always remains there.</p>
<b>Japan</b>	<p>In Japan, it is stipulated under the Food Sanitation Act that food business operators are encouraged to keep records of information of both suppliers for raw materials and wholesalers of the products to be sold from the perspective of ensuring food safety.</p> <p>These records are used to respond and to identify causative foods during retroactive investigations for the event of foodborne illnesses.</p> <p>In order to build effective and efficient traceability/product tracing system, it is necessary to strengthen infrastructure for collecting and storing traceability information, to improve the accuracy of traceability information, to facilitate cooperation among all parties including FBOs and to establish legal framework to support it.</p>

<b>Mexico</b>	<ul style="list-style-type: none"> <li>• Infrastructure and technology gap: there are establishments that are in a position to have more sophisticated traceability systems and others that do not have the means.</li> <li>• Training or awareness: There are stakeholders (intermediaries, carriers, brokers) who do not know the importance of their role in maintaining traceability or are unaware of the elements that a traceability system should contain, that is, what questions should the traceability system be capable to answer? Also it is needed awareness on the role of traceability in the protection of human, plant and animal health (one health).</li> <li>• Adoption of new technologies: It is necessary that the competent authorities have access to technologies that allow monitoring of product traceability. Unification of systems by sector (Integrated information systems from primary production to retail sales). Currently in the same sector, for example livestock, there are different traceability models and these do not cover all stages of the value chain from primary production to the point of sale of the finished product. It is necessary to have a system that can be linked to all the stages of the process.</li> <li>• Cost that represents the implementation and administration of integrated systems.</li> <li>• Capacity and ability (e.g., fraud investigation may require forensic skills/techniques).</li> <li>• Collection and storage of traceability information, including data ownership.</li> <li>• Availability and cost of technology for industry and regulators.</li> </ul>
<b>Morocco</b>	<p>Regarding Moroccan food law, food traceability is the first responsibility of FOB especially for traceback of foods in response to foodborne illness outbreaks or food contamination events. The Regulators must be “fast and right” in these cases. So, the concept of traceability at the national level is very small and, in our opinion, this concept and the traceability objectives must be broad in codex guidance. So, it will be valuable to the members to have more elements (2.0 and 3.0), clarified by Codex, and then it will be a good help to extend the national regulation and practices of members to manage the new challenges in food traceability regarding a Food Inspection and Certifications Systems.</p>
<b>Nigeria</b>	<ul style="list-style-type: none"> <li>• Lack of modern technological tools for traceability/product tracing</li> <li>• Poor record keeping among medium and small scale producers of food products</li> <li>• Importation of substandard products through porous borders without going through the proper channel</li> <li>• Lack of capacity to carryout investigation on unregistered or substandard products</li> <li>• Poor inter-ministerial and inter-agency collaboration in matters of traceability/product tracing in countries where a multiagency system is responsible for the food control system</li> </ul>
<b>Norway</b>	<ul style="list-style-type: none"> <li>• FBOs have in place good systems for traceability one step back and one step forward.</li> <li>• However better systems and guidance is needed on how to implement tracing within a FBO (cost benefit).</li> </ul>
<b>Peru</b>	<ul style="list-style-type: none"> <li>• Lack of regulation to implement this directive, to make it enforceable or binding.</li> <li>• Responsibilities for each of the actors.</li> <li>• Availability and cost of technology for industry and regulators.</li> <li>• Once the feasibility (that is, the availability and cost of the technology) has been assured, proceed with regulation that defines for each of the actors.</li> </ul>
<b>Republic of Korea</b>	<p>Republic of Korea has a 'food traceability' in the Food Sanitation Act.</p> <p>* The term "food traceability" means tracking foods with safety issues to identify their causes and controlling such foods to take necessary measures by recording and managing information on the foods at each stage of their production, processing and distribution</p> <ol style="list-style-type: none"> <li>1. Article 49 (Standards for Registration of Food Traceability)</li> <li>2. Article 49-2 (Recording and Storing of Food Traceability Information)</li> <li>3. Article 49-3 (Establishment of Food Traceability System)</li> </ol>

	<ul style="list-style-type: none"> <li>• The followings are related to processed food (food· livestock products· health supplements).</li> <li>• In the early days of the food traceability, it was mainly operated based on a voluntary registration system for food business operator. But due to limitations such as lagging registration and avoidance of registration, the mandatory application of traceability system is now targeted at the food for vulnerable groups (e.g. infants, patients, pregnant women, etc.) and will be gradually expanded (and be completed by December 2022).</li> <li>• Food traceability registrants (food business operators) must enter key product information (manufacturing quantity, stock and release quantity, customer information, etc.) into the food traceability system. Data in the system can be immediately searched so that the sales and distribution could be stopped and the products could be quickly retrieved when a product safety issue occurs.</li> <li>• But the additional staff and time to enter into the food traceability system act as a burden on the food business operator. Therefore, the more items they should register, the greater burden they will bear. And it is one of the obstacles in distributing the food traceability.</li> <li>• The time to link the food traceability system and registered product information is stipulated by law, and administrative actions are taken when violation occurs. To verify data suitability, field surveys and evaluations are conducted every 2 years for mandatory companies and 3 years for autonomous companies.</li> <li>• As traceability is applied only to some registered food types, it is necessary to expand the scope of registered foods to all types through effective policy means to improve convenience and encourage registration.</li> <li>• For imported food, there is 'Traceability of Imported Food etc.' in the Special Act on Imported Food Safety Control.</li> </ul> <p>* The term "traceability of imported food, etc." means control wherein information at every step from importation to sale of imported food, etc. has been recorded and managed so that the cause of a problem can be identified, and necessary measures shall be taken by tracking such imported food, etc. where the problem occurs with the safety of the imported food, etc.</p> <p>1. Article 23 (Traceability of Imported Food).</p>
<b>Singapore</b>	<p>Some challenges include:</p> <ul style="list-style-type: none"> <li>• Collection and storage of traceability information, including form of data, ownership of data</li> <li>• Challenges with using data to conduct product tracing in times of food safety incidents such as speed of access, accuracy of data that is kept, and availability of data especially for nodes which may be further upstream</li> <li>• Cost and availability barriers to using technology</li> </ul> <p>The implementation of traceability systems is largely undertaken by the industry. In times of food safety incidents, the food safety authority will request for the required traceability information, and work with the industry to conduct product tracing.</p>
<b>Spain</b>	<ul style="list-style-type: none"> <li>• <i>Capacity and capability (e.g., fraud investigation may require forensic skills/techniques)</i></li> </ul> <p>The biggest problem is usually the lack of human resources to achieve the established control objectives. Traceability procedures are well known and are generally well implemented by companies; and inspectors are trained in auditing techniques and there is a training dynamic capable of training new inspectors. The problem is that the inspection services do not grow at the rate that the industry grows and it is difficult to generate enough inspection pressure for the industry to maintain the required level of demand.</p> <ul style="list-style-type: none"> <li>• <i>Collection and storage of traceability information, including ownership of data</i></li> </ul> <p>The collection and filing of information is the responsibility of the operator. It must be available to the inspector and the competent authority, but it is kept by the operator. Confidentiality and unfair competition issues must be considered: if information is transmitted in detail throughout the production chain, operators may try to bypass their direct suppliers and negotiate directly with the companies that supply product to their suppliers. This problem generates reticence in the operators when it comes to transmitting</p>

	<p>certain data. CCFICS could establish criteria to determine the minimum content that should be shared between operators without incurring the risk of unfair competition. For example, many meat export certificates require detailing all the establishments through which the product has passed during processing, therefore it is necessary for operators to provide each other with this information. Is it really necessary, if the exporting country has been previously audited by the importer, and the equivalence between their control systems has been established?</p> <ul style="list-style-type: none"> <li>• <i>Speed of access and accuracy of data that is kept and made available, which can be critical in outbreaks with serious public health risks</i></li> </ul> <p>The agility of the traceability system to complete the tracking of a particular product in both directions (forward/backward) is critical. An indication should be established on the minimum degree of performance that is expected from the traceability system of the operators (in which period an operator should be able to reconstruct the traceability of a given batch, at least one step forward / one step back). The same thing happens with the degree of precision. Sometimes operators, to simplify their traceability management system, establish traceable batches so large that any measure that needs to be applied in an emergency takes on a dimension that slows down its execution and puts its effectiveness at risk. We often see companies that generate batches per day of work, which include a large volume of product. For example, slaughterhouses: in an emergency it would be necessary to investigate all the product generated in one day, which leads to a large number of farms that will require a lot of time and resources to be able to investigate each one of them. The management cost saved by the company when designing its traceability system is transferred to the competent authority when managing a risk.</p> <ul style="list-style-type: none"> <li>• <i>Availability and cost of technology to industry and regulators</i></li> </ul> <p>Available and cheap or free technologies should be used. Cost should not be an obstacle to implementing an efficient and effective traceability system in any company, and there are affordable solutions for any problem. A large company can invest in a computerized traceability system while a small one can maintain a manual record (in excel sheets for example) at low cost.</p>
<p><b>Uruguay</b></p>	<p>UY agrees with the following cited examples:</p> <ul style="list-style-type: none"> <li>• <i>Capacity and capability (eg, fraud investigation may require forensic skills/techniques)</i></li> <li>• <i>Collection and storage of traceability information, including data ownership</i></li> <li>• <i>Speed of access and accuracy of data being held and made available, which can be critical in outbreaks with serious public health risks</i></li> <li>• <i>Availability and cost of technology for industry and regulators .</i></li> </ul> <p>Also :</p> <p>The need to generate new legislation, according to the different kind of production systems and products.</p> <p>Taking this into account, depending on the chain, the following aspects need to be considered to a greater or lesser extent:</p> <ul style="list-style-type: none"> <li>• Changes in production models.</li> <li>• New roles and responsibilities for all actors.</li> <li>• Organizational capacity.</li> <li>• Technological implications that these systems need.</li> <li>• Greater investment.</li> </ul>
<p><b>USA</b></p>	<p>A few challenges are captured in the examples:</p> <ul style="list-style-type: none"> <li>• Development of a traceability/product tracing tool that is economically and technically feasible and broadly accepted across jurisdictions which does not negatively impact trade.</li> </ul>

	<ul style="list-style-type: none"> <li>○ There are many ways to accomplish this from paper forms to ERP systems (that are expensive and out of reach for many organizations).</li> <li>• Accuracy of lot data in hand (i.e., digitally recorded information).</li> <li>• How to address dilution-type trace issues due to co-mingling?</li> <li>• Time required to collect necessary details for a large recall when using a paper-based manual system.</li> <li>• Availability of traceability data in electronic sortable format when needed by a regulatory agency .</li> <li>• Consistent and accurate record keeping.</li> <li>• Concerns about data security (i.e., system interoperability when linked across multiple companies/countries).</li> </ul>
<b>FIA</b>	<p>Our comments in addition to what was mentioned above are as follows:</p> <ul style="list-style-type: none"> <li>• A general lack of modern digitalization of internal records and integration with systems for conducting trade with suppliers and customers to support effective traceability; data on raw materials, trace back requests, recalls, product data transparency and supply chain visibility.</li> <li>• Availability and cost of technology to industry and regulators combined with solutions that are solely proprietary and do not integrate or communicate easily with other systems (lack of interoperability).</li> <li>• Security of data when technology is utilized.</li> </ul>
<b>IAF</b>	<ul style="list-style-type: none"> <li>• Domestic / National guidance for traceability should always align to Codex principles and international standards (voluntary consensus) including terms and definitions e.g. The Australian Guide to Implementing Food Traceability (AGIFT).</li> <li>• Traceability/product tracing/transparency/chain of custody systems must be inclusive, to be able to be implemented both by simple and complex organizations.</li> <li>• Economically viable for all actors in the supply chain. Which includes; competent authorities, FBOs and consumers.</li> <li>• Applicable for both high income countries (HIC) and low and middle income countries (LMIC).</li> </ul>
<b>ICBA</b>	n/a
<p><b><u>Co-Chairs' summary of key points</u></b></p> <p>EWG members pointed to a wide range of practical and technological challenges associated with implementing a traceability/product tracing system, examples included:</p> <ul style="list-style-type: none"> <li>• the risk of system fragmentation</li> <li>• difference in level of sophistication of traceability systems used across the food industry</li> <li>• technological compatibility/interoperability between systems</li> <li>• availability and cost of technological solutions</li> <li>• differences in capability and capacity amongst food supply chain stakeholders, in particular small businesses, and intermediaries</li> <li>• increased traceability demands due to covid-19</li> <li>• collection and storage of traceability information</li> <li>• ownership of data and data sharing, commercial sensitivity and confidentiality</li> <li>• data standards, storage systems and tracking technologies</li> <li>• accuracy/reliability and speed of access to stored</li> <li>• burdens on small businesses and available resource for e.g. data input</li> </ul>	

- over-burdensome systems may negatively impact trade

### **Co-Chairs' reflections**

This question sought to gather Members' views on the range of challenges associated with traceability systems. The co-chairs' noted that members raised many and similar issues which points to the need for traceability systems to be both proportionate and accessible to the desired outcome. It follows that the role of Codex in promoting best practices includes enabling, rather than disabling, a range of fit for purpose solutions, e.g. manual systems through to more sophisticated technology-based approaches. The Co-Chairs' noted that a particular concern and therefore challenge, revolved around data security when traceability systems may be linked to multiple companies and countries.

### **Question 3**

#### **Which of these challenges identified in Question 2 should be addressed in Codex guidelines?**

<b>Australia</b>	<p>Australia recognises that the aforementioned challenges may not be address by Codex guidance as some would not be within Codex's mandate, however, they should be taken into account from a contextual perspective. Australia would support further discussion on whether the principles and guidance on traceability/product tracing should consider privacy frameworks for the handling of personal and/or commercial-in-confidence information.</p> <p>In developing the discussion paper, consideration should be given to whether these aforementioned challenges are within Codex's mandate and whether stronger references to existing Codex text would assist in addressing these challenges. Australia would also encourage an analysis of existing Codex text and/or work currently underway under CCFICS to identify linkages and determine if similar principles could be applied to address some of these challenges. These may include:</p> <ul style="list-style-type: none"> <li>• Guidelines for the Exchange of Information between Countries on Rejections of Imported Food (CXG 25-1997)</li> <li>• Principles and Guidelines for the Exchange of Information in Food Emergency Situations (CXG 19-1995).</li> <li>• Guidance on the Prevention and Control of Food Fraud (new work).</li> </ul>
<b>Canada</b>	<p>Canada suggests the following:</p> <ul style="list-style-type: none"> <li>• Speed of access and accuracy of data that is kept and made available, which can be critical in outbreaks with serious public health risks . For example interoperability of data requirements (e.g. same/different terms to describe the same/different things – lot code vs. product code vs. serial number). Common understanding of terminology is important, within a country and at the international level.</li> <li>• Collection and storage of traceability information</li> <li>• Variations in the national food control system infrastructure, legislative authorities, and division of responsibilities between different levels of government may pose challenges in implementing comprehensive traceability systems.</li> </ul>
<b>EU</b>	n/a
<b>India</b>	The Codex guidance on Traceability should focus on a generic and result oriented traceability system rather than suggesting the traceability options available to the stakeholders. The choice of using any particular traceability system should always left with the concerned player in the chain depending on his need and requirement.
<b>Japan</b>	To improve the accuracy of traceability information and to facilitate cooperation among all parties including FBOs.
<b>Mexico</b>	All elements: Training, unification of systems by sector, usefulness of traceability to protect health from a one health approach, responsibilities, etc. includes the equivalence of traceability systems.
<b>Morocco</b>	In our opinion, the aim of the proposal of new Codex guidance on food traceability/product tracing should be to help members:

	<ul style="list-style-type: none"> <li>to have a food Traceability System in order to identify food product origin, safeguard food in transit, and decrease the associated time and cost of food recalls...;</li> <li>The development of fit-for-purpose TSs requires input from primary producers to governments and the use of modern technology to meet the operational and legal requirements. Only through Codex work is it possible to deliver a fit for purpose, state of the art TS for our global food supply networks capable of addressing the environmental, corporate, and social challenges surrounding food security and safety.</li> </ul>
<b>Nigeria</b>	<ul style="list-style-type: none"> <li>All of the above</li> </ul>
<b>Norway</b>	n/a
<b>Peru</b>	We believe that both challenges should be addressed in the present guideline.
<b>Republic of Korea</b>	How to establish and distribute a system that enables traceability/product traceability, etc.
<b>Singapore</b>	Challenges regarding the collection, storage, and use of traceability information should be addressed in the Codex guidelines.
<b>Spain</b>	All of them.
<b>USA</b>	The Codex guidelines should address the deliverables, e.g., capability (percent recovered), timing related to receipt of information, etc., rather than the methods to get there. The guidance should also address best practices for manufacturers.
<b>Uruguay</b>	<p>We consider that all the points raised in answer 2 are relevant, particularly those that refer to:</p> <ul style="list-style-type: none"> <li>legislation.</li> <li>roles and responsibilities of the different actors.</li> </ul>
<b>FIA</b>	<p>FIA agrees that the challenges described in Question 2 should be discussed and Codex guidelines will be important to provide a framework for interoperable traceability to address the foundational aspects to achieving efficient traceability.</p> <p>Lack of financial resources, training and labour needs for increased capability, reduced availability of/accessibility to precise and dependable data in a timely manner, non-availability of user friendly but credible technology and tools all play a part in affecting stakeholder use, acceptance, and application of these systems. Stakeholder consultation of important parties involved in governance and compliance will support identification of the priority actions to be considered while developing a roadmap for effective of traceability systems in the local markets. Beyond these, collaboration between solution providers and industry members will be needed for the benefit of all.</p>
<b>IAF</b>	<ul style="list-style-type: none"> <li>Domestic / National guidance for traceability should always consider alignment to international standards (voluntary consensus) over private standards.</li> <li>Governments must be encouraged to leverage existing international standards e.g. ISO 22005, ISO 22095, etc and ISO Committee on Conformity Assessment (CASCO) for public policy to the greatest extent.</li> <li>Ensure consistency with the WTO SPS and TBT agreements, also the WHO Global Strategy for Food Safety 2022-2030. To recognize the cross-border nature of the regional and global supply-chains and trading networks in which product traceability mandates would operate.</li> </ul>
<b>ICBA</b>	<p>ICBA suggests that the challenges described above should be considered for discussion and possible inclusion. The lack of financial resources, training and labour needs for increased capability, reduced availability of/accessibility to precise and dependable data in a timely manner, non-availability of user friendly but credible technology and tools all play a part in affecting stakeholder use, acceptance, and application of these systems. Stakeholder consultation of the key parties involved in governance and compliance will support identification of the priority actions to be considered while developing a roadmap for effective traceability systems in the local markets.</p>
<b><u>Co-Chair summary of key points</u></b>	

EWG Members were clear that all of the challenges identified in question 2 should be considered during future discussions though also an acknowledgement that some of the challenges may not make it into the actual guidance. Some members suggested it might be informative to review other existing Codex texts to see how they address some of the challenges, for example CXG 25 -1997 (Guidelines for the Exchange of Information between Countries on Rejections of Imported Food), CXG 19 – 1995 (Principles and Guidelines for the Exchange of Information in Food Emergency Situations) and the new Guidance on the Prevention and Control of Food Fraud. Other members pointed to related international standards and were keen to ensure consistency, including with the WTO SPS and TBT agreements.

EWG Members repeated earlier comments about Codex guidance on traceability being focussed on outcomes by promoting a flexible and results-oriented approach to traceability so that regulators and FBOs could take account of their national circumstances and capacity. On this latter point it was suggested that the guidelines might look to incorporate advice on solutions to address the variations in the national food control systems capacity and capability, including lack of financial resources, labour and availability of training.

#### **Co-Chairs reflections**

This question sought to understand which of the challenges identified under question 2 should be addressed in the Codex guidelines, whether any were out of scope and if some were viewed as more important than others. The co-chairs' take from members' comments is that future discussions should consider each of the challenges on merit to see whether additional guidance is necessary or appropriate, taking account of the mandate of Codex.

#### **Question 4**

**What information is important to include in a guideline on traceability/product tracing? Is the format/ structure of the current text logical and helpful to the reader?**

***Noting that the format structure of recent CCFICS texts include a preamble, purpose, scope, roles and responsibilities, key principles, and guidance on practical considerations to implement a range of best practice approaches and capacity considerations.***

<b>Australia</b>	<p>Australia notes that the principles for traceability/product tracing, when read in conjunction with existing Codex guidance such as <i>Principles and Guidelines for National Food Control Systems</i> (CXG 82-2013), provides sound guidance for competent authorities to implement traceability systems within a NFCS that isn't overly burdensome for government or industry. Existing Codex guidance may adequately cover roles and responsibilities and key principles, and Australia would encourage the Co-Chairs to consider this in the development of the discussion paper. In addition, the current definition of traceability/product tracing "the ability to follow the movement of a food through specified stage(s) of production, processing and distribution" can still be applied in today's context no matter the traceability system utilised.</p> <p>However, Australia does recognise the benefit in a timely review of the existing product tracing/traceability principles. Should CCFICS agree there is a need to revise the principles and expand the scope to include additional guidance, the question of the structure would be better addressed at that point.</p> <p>Australia would support further discussion on whether guidance should cover considerations to implement a range of best practice approaches, capacity considerations and practical issues to be addressed (such as system interoperability).</p>
<b>Canada</b>	<p>Considerations for traceability/product tracing during a food safety incident or recall could also be included.</p> <p>The text should include what is needed for the guidance (e.g. what is essential) and, if relevant, strive for the same/similar formatting for all texts. The most important part is to make it clear, useful and easy to understand for all readers.</p>
<b>EU</b>	<p>The structure of the new text on traceability should follow the format of recently adopted CCFICS texts.</p>
<b>India</b>	<p>Format/structure of current document CAC/GL 60-2006 is very basic and does not address current expectation from traceability system. Therefore, format structure of CCFICS text could be considered which include scope, purpose, roles and responsibilities, key</p>

	principles, and guidance on practical considerations to implement a range of best practice approaches and capacity considerations.
<b>Japan</b>	Japan suggests to keep the current format and update contents of existing sections as needed.
<b>Mexico</b>	<p>It is important that the Product Traceability/Tracing System allows answering the various questions that lead to the full identification of a product and its history of production, process, ingredients and supplies and raw materials used in its preparation, import/export/distribution and retail sale.</p> <p>It should be noted that the information derived from the Traceability system will be used for the implementation of health security measures by the competent authorities and food business operators, as well as for the exchange of information between the parties involved, in situations of food rejection and in emergency situations associated with food safety.</p> <p>Legal advice both for individuals and for official parties, which allow: structuring a traceability network, understanding the impact of having the corresponding information and the consequences of not having it or falsifying it.</p>
<b>Morocco</b>	<p>We consider that the structure of the current text (CXG 60-2006) is outdated, especially in relation to a subject (traceability) which is constantly evolving. So, Morocco supports a deep review of this document relating to his format-structure to be close with a recent CCFICS texts (a preamble, purpose, scope, roles and responsibilities, key principles, and guidance on practical considerations to implement a range of best practice approaches and capacity considerations).</p> <p>Concerning the substance of the document, Morocco proposes three stages of development of the guidance:</p> <ol style="list-style-type: none"> <li>1. Information record: <ul style="list-style-type: none"> <li>• Agreement in laws and regulations on food traceability.</li> <li>• Simple information recording system with paper or electronic document.</li> </ul> </li> <li>2. Data integration <ul style="list-style-type: none"> <li>• Real-time information sensing with IoT.</li> <li>• Information integration of each link of the whole supply chain.</li> <li>• More popular of electronic and information traceability system.</li> </ul> </li> <li>3. Intelligent decision <ul style="list-style-type: none"> <li>• Demand of intelligent decision-making to improve food safety, integrity and quality.</li> <li>• New generation of information technology development.</li> </ul> </li> </ol>
<b>Nigeria</b>	<ul style="list-style-type: none"> <li>• Product category/Type of product (fresh or processed)</li> <li>• The format/structure of the current text is logical and self-explanatory</li> </ul>
<b>Norway</b>	<ul style="list-style-type: none"> <li>• Following the format structure of recent texts would be an advantage for a guidance document.</li> <li>• Current text is too general to be of any help/assistance to CAs and FBOs.</li> </ul>
<b>Peru</b>	We believe that the guidance should include detailed examples for a better understanding, and not be so generic.
<b>Republic of Korea</b>	<ul style="list-style-type: none"> <li>• By clarifying the purpose and scope of traceability/product traceability, the guidelines should not be used in an inappropriate way based on distorted interpretation or misunderstanding, and</li> <li>• It should contain useful information that can help those who use the guidelines (competent authorities, food business operators, etc.)</li> <li>• The existing guidelines (CXG 60-2006) reflect the format/structure at the time of development, and need to be revised in line with the recent trend of CCFICS documents with a more detailed and consistent format/structure including examples.</li> </ul>
<b>Singapore</b>	We suggest for the following information to be included in a guideline on traceability/product tracing:

	<ul style="list-style-type: none"> <li>• Definitions of traceability, traceability systems, traceability information, etc.</li> <li>• Roles and responsibilities .</li> <li>• Guidance on best practices and approaches to traceability systems, including information collection, storage, and communication</li> <li>• Guidance on approaching practical challenges to traceability system implementation (e.g. capacity and capability considerations in technology adoption) .</li> </ul> <p>While the format/structure of the current text is logical and helpful to the reader, we suggest following the format structure of recent CCFICS texts, which segregates the content into more sections, enabling ease of reference by the reader.</p>
<b>Spain</b>	<ul style="list-style-type: none"> <li>• Objective to be achieved by the required traceability system: for example, to ensure the safety of the product in the face of a certain risk, how far traceability must go? (what is the minimum depth necessary to guarantee risk control?)</li> <li>• Traceability unit (definition, maximum size depending on the product/risk): example: batch=one day's production (example, pork) vs batch=individual animal (example, beef)</li> <li>• Evidence to be kept by the operators (minimum information necessary to guarantee traceability and avoid unfair competition between operators)</li> <li>• Records that operators must generate/keep: content, operability, agility</li> <li>• Control objectives for competent authority: minimum objectives to guarantee the efficiency and reliability of the system (% operators per year, file sampling system...)</li> </ul>
<b>USA</b>	<p>The US supports the format of the current text. The guidance should focus on areas that could inadvertently hamper cross-border communication (e.g. unit of measure, data formatting (e.g., date formatting), or language requirements). The guidance could also include the concept of modelling the process for traceability, highlighting the points in the process where key data elements are recorded and critical tracking events occur.</p>
<b>Uruguay</b>	<p>The current document is logical and useful, but should be consistent with the current format of CCFICS documents. However, Uruguay considers that the principles that exist in the current document should be included in the new document.</p>
<b>FIA</b>	<p>In view of the age and origin of the Codex document, FIA would support revising the Codex text to reflect the current state of industry norms and practices. The format and structure of the existing document still make sense but we would like to suggest a “stock-take” of current country traceability regulations/programs that could be useful to understand the current global practices and identify whether other enhancements might be needed to the current Codex principles (CXG 60-2006).</p> <p>In general, we view that foundational information on the requirements and business process that are necessary for an effective traceability system can and should be sector-agnostic.</p>
<b>IAF</b>	<ul style="list-style-type: none"> <li>• Codex guideline to consider alignment with ISO 22005 clause 5.5.3 Information requirements and clause 5.6 Establishment of procedures for consistency between international standards.</li> <li>• Codex guideline to support tech-neutrality to enable the use of diverse technologies and encourage innovation that is inclusive and working using a common vocabulary and a common framework towards reducing food risks. Recognizing the disparate resources and quickly-changing technologies available to governments, business and producers at any given time.</li> </ul>
<b>ICBA</b>	<p>ICBA would conclude that there is a need to revise the Codex text based on both the understanding of when the current principles were created (2006) and a strong awareness of today's product tracing practices within the food &amp; beverage industry. In addition, ICBA supports the current format and structure of the existing document. We would offer the suggestion of a “stock-take” of current country traceability regulations/programs that could be useful to understand the current global practices and could identify where possible enhancements are needed.</p>
<b>Co-chairs' summary of key points</b>	

Whilst a few EWG members considered the format of the current text adequate most took the view that it would benefit from aligning with the structure/format of more recent CCFICS text in order to provide additional helpful information and guidance. Members reiterated some of their earlier comments about the need for guidance to be clear, useful and easy to understand, with some suggesting the inclusion of a range of best practice approaches, in particular to illustrate how some of the challenges identified might be overcome, e.g. interoperability and capacity issues.

### **Co-Chairs' reflections**

This question sought members views on the content and asked members to consider the format of the 2006 guidelines alongside the format of more recently adopted CCFICS texts. The co-chairs were reassured by members comments that the current guidelines provide the essential information. However, many members favoured the format used in newer texts as it would enable additional helpful text to be added and in doing so make the traceability guidelines more user friendly.

### **Question 5**

**What characteristics or elements are important in a traceability/product tracing system to enhance communication/information sharing between countries? Are these adequately covered in the current text?**

*For example,*

- ***Interoperability of systems***
- ***Access to systems and data standardization, e.g., reporting format containing accurate information related to source, ingredients, batch/lot, production dates***
- ***Contact details***

<b>Australia</b>	<p>Australia notes that following elements may be considered as important to enhance communication and information sharing between countries:</p> <ul style="list-style-type: none"> <li>• Consideration of the need for interoperability, where feasible, between traceability systems to facilitate better data capture and generate better quality data to support certification/verification efforts and improve incident management/responses.</li> <li>• Consistent traceability/product tracing reporting format. Due to changing trade dynamics and the increasing demand for product visibility and access to information captured through different stages of the supply chain, there is significant benefit in promoting international consistency in data standards, where possible.</li> </ul> <p>Australia recognises that these elements may not be within Codex's mandate to be included in principles and guidance on product tracing/tractability text and would like to reiterate that consideration should be given to existing Codex text (refer response to Q3 and Q4).</p>
<b>Canada</b>	<p>Canada supports the following examples when food is traded one step forward, one step back between countries:</p> <ul style="list-style-type: none"> <li>• <i>Interoperability of systems</i></li> <li>• <i>Contact details</i></li> </ul> <p>In addition, Canada proposes the following:</p> <ul style="list-style-type: none"> <li>• Canada considers standardization of the core traceability data elements to be important from country to country. For example, the availability of pictures of the product and lot code information electronically to foreign competent authorities.</li> <li>• As mentioned in the scope of <a href="#">CXG 60-2006</a>, this document should be read in conjunction with all relevant Codex texts. Canada suggests for the Codex document- <a href="#">General Standard for the Labelling of Prepackaged Foods</a> to be referenced. This is to ensure the consumer receives appropriate product identification for purposes of a recall.</li> </ul>
<b>EU</b>	<p>Sharing of contact details between the competent authorities is a starting point to enhance communication between countries. Thereafter, standardisation of reporting systems should be considered.</p>
<b>India</b>	<p>Three characteristics, i.e. identification, information and the links between supply chain participants are common, irrespective of process or product involved. However, the</p>

	<p>traceability systems may differ in the amount of information recorded, how far (back or forward) the system tracks the information and the degree of precision with which the system can pinpoint the movement of a particular product. Therefore, compatibility of the systems of countries, access to systems /data are important aspects for sharing information between countries. The current text is very basic and does not address these aspects.</p>
<b>Japan</b>	<p>The current text (Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations CXG 19-1995) already covers the emergency response and information exchange between countries.</p>
<b>Mexico</b>	<p>Accessibility of information for the consumer.</p>
<b>Morocco</b>	<p>The importance and relevance of TSs are becoming more and more evident over time. TSs function to maintain and ensure the safety and integrity of our food supply. The framework, design,</p> <p>requirements for TSs will vary across geographies, cultures, and products. However, the underlying driver of these systems is the need to share standardized and accurate information across trading partners, be those local or global. So, for us, these elements are important:</p> <ul style="list-style-type: none"> <li>• Integrate the new traceability vision: interoperability of systems especially in fresh food and seafood</li> <li>• Digitization and combination with other technologies (blockchain)...</li> </ul> <p>To conclude, the integration of emerging technology in the codex document will aid in the growing need to holistically trace food products throughout the entire system. While this changing landscape brings with it many challenges, there are opportunities for growth in both the public and private sector.</p>
<b>Nigeria</b>	<ul style="list-style-type: none"> <li>• Transportation routes of products including major ports of entry and exit</li> <li>• It was not adequately covered in the text</li> </ul>
<b>Norway</b>	<ul style="list-style-type: none"> <li>• First step towards having traceability would be having an overview (could of course say "all actors") from whom to whom (legal owner as well as the holder of the products) Follow the physical product (not necessarily the paper following the product).</li> <li>• Who, what, when and how much.</li> </ul>
<b>Peru</b>	<ul style="list-style-type: none"> <li>• Interoperability of systems, in order to provide timely response to incidents.</li> <li>• Access to data standardization, example report format containing accurate information related to the source, ingredients, batch or other identification system, production dates, expiration dates (if applicable).</li> <li>• Regarding the contact detail, we consider that it is specified to which it refers.</li> </ul>
<b>Republic of Korea</b>	<ul style="list-style-type: none"> <li>• Identification unit of the product to be tracked (individual product, packaging or distribution unit, P/T, etc.)</li> <li>• Policy support to create a digital ecosystem and</li> <li>• setting the international standard for data display of product recognition unit (bar code (GTIN, GS1), QR, RFID, etc.)</li> </ul>
<b>Singapore</b>	<p>The following characteristics or elements are important to enhance communication/information sharing between countries:</p> <ul style="list-style-type: none"> <li>• Contact information of contact points in the event of incidents</li> <li>• Data standardization to facilitate linking of information (e.g. reporting formats detailing essential information to be communicated, common identifiers of implicated products)</li> <li>• Communication mechanisms (e.g. between authorities, on products such as adequate labelling).</li> </ul>
<b>Spain</b>	<p>When considering the interaction between countries, the objective should not be to share detailed traceability information, but to establish the equivalence between the systems and guarantees offered by each country. The importing country must have the necessary information to know that the exporting country guarantees with its traceability control</p>

	system that the importing country's objectives in terms of traceability and security are met. But too detailed information about each of the product's manufacturing steps should not be required. The traceability system of the exporting country must ensure that the operators generate a record of evidence that the importing country can verify in specific situations (investigation of an incident, follow-up audit, etc.) and must have mechanisms that ensure that the operators correctly apply the system and that the information can be retrieved reliably and quickly in cases where it is necessary (in an emergency). Detailed information should not be required systematically.
<b>USA</b>	The current text adequately covers non-proprietary systems, standardization, exchangeable data sets, and standard formatting for data. The capability of electronic data format and understanding how challenging the traceability portions of processes are handled are important.
<b>Uruguay</b>	UY agrees with the examples cited, which are not found in the current document.
<b>FIA</b>	Our comments in addition to what was mentioned above are as follows: <ul style="list-style-type: none"> <li>• Text needs to assist industry in implementing a traceability system to improve or enable food safety.</li> </ul>
<b>IAF</b>	<ul style="list-style-type: none"> <li>• Important characteristics would be: <ul style="list-style-type: none"> <li>○ Definition of Traceability and Transparency</li> <li>○ Interoperability standards for information / data sharing e.g. GS1</li> </ul> </li> <li>• Avoid overly prescriptive guidance and being too narrow on characteristics or elements.</li> </ul> <p>Align Codex guidance to what ISO 22005 provides in terms of characteristics or elements, and clearly define and separate who is responsible for what.</p>
<b>ICBA</b>	n/a
<p><b><u>Co-Chairs' summary of key points</u></b></p> <p>EWG Members appear supportive of the suggested characteristics of an effective traceability/product tracing system though some caution that certain elements may go beyond the scope or mandate of Codex. However, members recognise the value of enabling communication between systems through greater interoperability, access to systems and data standardization e.g., the key data elements to be recorded and stored. Members also commented about the format and type of data and the need for accurate information about source, ingredients, batch/lot, production dates and contact details etc. Whilst calling for enhanced standardization some members reiterated the need for flexibility and avoidance of overly prescriptive requirements.</p> <p><b><u>Co-chairs' reflections</u></b></p> <p>This question sought Members views on whether the content of the current guidance was sufficient or should be supplemented. The co-chairs' noted that most members provided comments that recognised the increasing importance of robust traceability systems and the value of standardisation of certain key elements not included in the current text (CXG-60-2006).</p>	