

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 6

CRD9

Original Language Only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

Twenty-seventh Session

DRAFT REVISION AND UPDATING OF THE PRINCIPLES FOR TRACEABILITY/PRODUCT TRACING AS A TOOL WITHIN A FOOD INSPECTION AND CERTIFICATION SYSTEM

(Comments submitted by Australia, Ghana, Mexico, Morocco, Nigeria, Republic of Korea, and East African Community)

Australia

Good practice

20. The data/information collected to give effect to traceability/product tracing should be the minimum level required to deliver the traceability/product tracing outcome.

[This would be a new paragraph under the 'Good practice' heading after the current version's paragraph 19]

Traceability/product tracing system design

21.a. What level of traceability is required to provide confidence in the certification of export product and the delivery of exporting country NFCS requirements and importing country requirements.

21.b. Defining situations when FBOs will be requested to provide data/information to the **domestic or trading partner** competent authority such as during and investigation of a foodborne outbreak, to identify products subject to recall, or to identify food fraud.

21.c. The minimum data/information necessary to establish traceability/product tracing sufficient to **trace that product in the eventuation of** ~~manage~~-specific risks.

[This may not be required as is covered in '21.b.' above]

22.b. Whether records should be maintained **and whether** in paper or electronic format?

23. A traceability/product tracing system should be technology neutral. **The standardization of data required by countries for traceability/product tracing is key to enabling technology-neutral interoperability of traceability systems which to support use by FBOs, regardless of their resource availability or constraints. A technology-neutral system will also allow for adaptability and continuity as new technology is implemented in a NFCS**~~technological advances are made.~~

Information protection

27. Data/information sharing agreements may be needed between competent authorities to provide a robust governance mechanism that enables data/information to be shared across ~~a food supply chain~~ by providing the necessary assurances on data protection and security.

[As this is between competent authorities it is not necessary to identify food chains]

Communication and Cooperation

29. ~~Competent authorities may require data/information from FBOs within a specified timeframe and may request relevant traceability/product tracing data/information from other competent authorities to assist in their investigations; for example, during a food safety incident, to identify impacted food products and address any public health risks or food fraud.~~

[Paragraphs 28 and 30 cover these statements]

Ghana

Preamble, Paragraph 1

Position

Ghana supports the retention of the text in the square brackets. We however, recommend the deletion of product to read:

“Traceability/product tracing consists of acquiring information about movement of food, which can be retrieved along the supply chain to all the way to the consumer.”

Rationale

The word “food” has been defined by other Codex texts and leaves no room for confusion. The inclusion of product may lead to the interpretation that the principles apply to only processed foods.

Paragraph 2

Position

Ghana supports the movement of the text in paragraph 2 to the scope.

Rationale

The provisions on the applicability of the Guidelines best fits in the scope.

Scope

Position

Ghana supports amendment of the scope to read:

“This document provides guidance to assist competent authorities on establishing traceability/product tracing as part of their NFCS and promote good practice by providing guidance to food business operators (FBOs) on implementation of traceability/product

tracing within their food operations and throughout the food supply chain. The guidance does not mandate a single way to conduct traceability/product tracing.”

Rationale

The amended text incorporates paragraph 2 of the preamble and ensures that the scope fully defines the applicability of the Principles and Guidelines for Traceability/Product Tracing.

Traceability/product tracing system design

Position

Ghana supports the inclusion the text in the square brackets in the Guideline and deletion of footnote 6.

Rationale

The text provides clarity and maintain neutrality. The citig of a body or institution in a Codex Guideline may lead to the presumption of bias in favour of such an organisation.

Communication and cooperation, Paragraph 30

Position

Ghana supports the retention of the text in the square brackets provided therein.

Rationale

The text in the square brackets provides guidance on the available Codex texts that provide precise guidance for exchange of data/information in food safety emergencies

Mexico

COMENTARIOS GENERALES (General comments)

México agradece a los Estados Unidos de América, Australia, Ecuador, Honduras y Reino Unido la preparación del documento. Al respecto se apoya el avance de los trabajos y se proponen algunos ajustes que se presentan en la siguiente tabla.

COMENTARIOS ESPECÍFICOS

Referencia	Categoría	Cambio propuesto	Comentario/ Justificación
DEFINITIONS Parr. 9	Editorial	"Where words in this document have been defined in previous Codex texts, those definitions apply in this document (see Appendix 1)"	We suggest to include those definitions in this section. If the definitions are useful and will provide clarity for the correct interpretation of the document, they should be in this section.
GOOD PRACTICES 21. d	substantial	d- Whether the activities performed by the FBO will impact on the traceability/product tracing data/information they are required to maintain. For example, will the requirements for traceability/product tracing data/information be different for an FBO that manufactures a new food product and an FBO that only distributes finished food products (without additional processing)?	The example adds no value to the paragraph. Finally, the FBO should retain information (one step forward and one step back, as well as the process stages under its control) regardless of its position in the production chain.
GOOD PRACTICES 18	substantial	... made available to <u>other</u> competent authorities of the exporting country <u>as well as to the competent authorities of importing or exporting countries</u> upon request.	We think it could be generalized, this also aligns with paragraph 30.

GOOD PRACTICES 24.	Técnico	24[To encourage interoperability, standardization of syntax (formats) and semantics (meanings) of data/information that shared wholly or partly by different systems may be useful. This sharing can be internal (among different business processes of an organization) or external (between different organizations).] Competent authorities may want to consider utilizing international data standards ⁶ as a benchmark for their traceability/product tracing	We agree on removing brackets and keeping the text.
Parr. 26 bis	substantial	We suggest include a paragraph: 26 bis. "Digital tools may facilitate the exchange of information between authorities, so it recommended that transmitted by authenticated and secure electronic means. When digital tools are used, appropriate safeguards should also be applied."	The availability and application of new technology, such as digital tools, may facilitate traceability/product tracing by enabling faster access to food supply chain information. Digital tools can improve communication across food supply chains and play an essential part in enhancing traceability to effectively manage and respond to risks. For this to work, digital technologies should be based on guidelines and standards so that the data exchanged is interoperable and allows for secure communication throughout the food supply chain.
Communication and cooperation Parr 30	Substantial	Competent authorities should respond in a timely manner to requests from other competent authorities for traceability/product tracing data/information, consistent with their national legislation and relevant data/information protection requirements. [When requests for traceability/product tracing data/information is related to a food safety incident or emergency to identify impacted food products and address any public health risks, they might want to refer to CXG 19: 1995, Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations.]	We agree on removing brackets and keeping the text.
Annex 1: Definitions	General, substantial		Include in the definitions section with the corresponding citation.

Morocco

Morocco proposes the addition of a new paragraph 22 bis

22 bis : *Traceability/product tracing system shall identify a Critical Tracking Event (CTE) which is a specific step a long food supply chain where certain key data/information elements need to be captured to enable the traceability of a food and/or any of its ingredient and packaging*

Rationale : Incorporating the concept of Critical Tracking Events (CTEs) into the Codex guidelines would enhance the precision, effectiveness, and standardization of traceability systems. CTEs offer a structured approach to data collection and identification, focusing on the most critical points in the supply chain where risks are highest. This addition would support better risk management, promote global harmonization of traceability practices, and align with modern technological advancements, ultimately improving food safety, food fraud and protecting consumer health.

Nigeria

Nigeria appreciates the Report prepared by the Electronic Working Group, chaired by the United States of America and co-chaired by Australia, Ecuador, Honduras, and the United Kingdom.

Nigeria notes the extensive work undertaken and supports the advancement of the draft revised Principles to Step 5.

Rationale

The tools shall be useful by competent authorities within their National Food Control Systems in strengthening food inspection and certification.

Republic of Korea

Republic of Korea sincerely appreciates to the EWG and Chairs on the work. We support current draft version.

However, regarding footnote 3 which states "production can include a primary production", it will be helpful to provide guidance or general principles on how to engage primary products in the system if possible. We are concerned that there is still much need for further consideration on how to adapt the traceability of the 'primary products.' Many primary products are sold directly from individual farms, without going through wholesale or retail, such as through farmer's markets. We are intrigued if this revised guideline can also address general principles on how such primary products should be included in the traceability system.

East African Community

Position: The EAC supports the advancement of the draft revised Principles and Guidelines for Traceability/Product Tracing as a Tool Within a Food Inspection and Certification System (CXG 60-2006) to Step 5 with the comments below for consideration.

Rationale: The EAC supports advancing the draft revised Principles and Guidelines for Traceability/Product Tracing (CXG 60-2006) to Step 5, as they are essential for enhancing food safety, facilitating market access, and promoting transparency within food systems. These principles are especially valuable for African countries, where strengthening food inspection and certification is crucial for protecting consumers, accessing global markets, and building trust among trading partners. Moreover, aligning with these international standards supports progress towards responsible food production.

Preamble, Paragraph 1:

Position: EAC proposes retention and amendment of the text in square brackets by deleting the word "products" after food to read: [Traceability/product tracing consists of acquiring information **which can easily be retrieved** about **the movement** of food, **Food ingredients, and packaging** along the supply chain all the way to the consumer.]

Rationale: Food as defined by Codex is more embracing rather than 'food products' that could imply focus on only

the finished products i.e. Food means any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of “food” but does not include cosmetics or tobacco or substances used only as drugs. This is also to further qualify the information that is being acquired for traceability/ Product tracing and provide additional clarity as well as be consistent with the document e.g. in clause 10.

Preamble, Paragraph 2:

Position: EAC proposes that para 2 be deleted and taken to scope.

Justification: The preamble should be limited to the introduction of the subject; traceability/product tracing. The statement in paragraph 2 extends to the applicability of draft revised Principles and Guidelines which best fits in the scope.

Scope:

Position: EAC proposes amendments to the scope to read:

This document provides guidance to assist Competent Authorities in establishing traceability/product tracing as part of their NFCS. It also provides guidance to **guides** Food Business Operators (FBOs) on **the** implementation of traceability/product tracing within their food operations and throughout the food supply chain. **These guidelines are intended to promote good practice, not mandate a single way to conduct traceability/product tracing.**

Justification: Incorporated para 2 of the preamble into the scope where it adequately fits.

Definitions

Position: EAC proposes all the definitions in the appendix to be part of para 9 of the guideline and proposes the opening statement to read: ‘The following definitions apply’.

Justification: The definitions have been used in the standard and are better defined within the definitions section.

Para 12 d and e:

Position: EAC proposes that **Para 12 d and e** should be amended and combined to read:

Ensure ~~Test~~ their traceability/product tracing system ~~to ensure it operates as intended.~~ ~~e. Implement the traceability/product tracing system~~ and adapted to their organization, their sector, their supplier profile, customer requirements (contractual requirements) and legal requirements. Based on these, evaluate the internal and external needs. Identify the data/information that needs to be traced and define the parameters of traceability.

Justification: To make the guideline general and not prescriptive. The merging of the two statements brings more clarity to the new text.

Para 24:

Position: EAC proposes the modification of the text in the square brackets to read:

“To encourage interoperability, standardization of syntax (formats) and semantics (meanings) of data/information, that are shared wholly or partly by different systems., ~~may be useful. This sharing can be internal (among different business processes of an organization) or external (between different organizations).~~ Competent authorities may ~~want to~~ consider utilizing international data standards⁶ as a benchmark for their traceability/product tracing.”

Justification: To simplify the para by not being prescriptive on data sharing.

To encourage interoperability, standardization of syntax (formats) and semantics (meanings) of data/information, that are shared wholly or partly by different systems may be useful. competent authorities may consider utilizing international data standards⁶ as a benchmark for their traceability/product tracing.”

Para 30:

Position: EAC Proposes the retention of the text in the square brackets.

Justification: It provides further guidance and is important to the user.