

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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

Agenda Item 6

CX/GP 04/20/6-Add. 2

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON GENERAL PRINCIPLES

Twentieth Session

Paris, France, 3 - 7 May 2004

DEFINITION OF TRACEABILITY/PRODUCT TRACING OF FOODSTUFFS

GOVERNMENT COMMENTS

(Brazil, Cuba, Egypt, Japan, Uruguay, OIE)

BRAZIL

1. GENERAL COMMENTS

Brazil would like to thank France for coordinating the work of the Electronic Group on this issue and for all the compilation of opinions on the same.

Brazil considers that both the definition of traceability and the scope for Codex purposes must be made very clear so that this particular tool may be used to attain the objectives for which it has been proposed.

Brazil therefore, reiterates its previously stated opinion that Codex should prioritize the application of traceability as a food safety risk management option.

2. SPECIFIC COMMENTS ON THE PROPOSED DEFINITION

Brazil considers that, taking into account the diversity of the productive processes in each country or region, and the risks associated with each product, the CCGP can discuss and establish **a general definition of the term** without including concepts that call for the use of specific traceability implementation mechanisms.

As regards the definition proposal put forward, Brazil considers that it includes elements that refer to the application of traceability, thus going beyond the task set for the CCGP by the decision of the last meeting of 2003 which referred to the consensus obtained that it should only to draft a definition of traceability. In this sense, the specification made under the item "Product Identification" which states that this should be done by a **unique means** seems to us to be inadequate as it tries to specify elements that refer to implementation and thus goes beyond the concept of a "definition". Furthermore, the last paragraph clearly refers to the application of traceability and should be excluded. Its contents should be discussed by the appropriate Committee.

3. COMMENTS REGARDING APPENDIX 2 - "OTHER RELEVANT TOPICS ABOUT THE TRACEABILITY/PRODUCT TRACING OF FOODSTUFFS"

Brazil is of the view that the issues set out in Appendix 2 include a lot of aspects related to the implementation of traceability and should not be dealt with in this document since the agreement reached at the 18th Session was that there was consensus only to draft a definition. So, Brazil is of the opinion that those issues should be considered by the appropriate Committee.

CUBA

- We consider that the definition of Traceability/Product Tracing of foodstuffs should be approved through sufficient consensus to provide a clear guideline for the people operating at any stage of the food chain.
- We reject the idea of a Traceability/Product Tracing System for any other purposes, as for instance, the authenticity of the information submitted to consumers, the prevention of deceptive practices and the use for ensuring fair practices as a legitimate objective.
- We support the idea that it should only be used as a measure for food safety risk management.
- The scopes of the definition should be clearly defined so that it does not turn into an unwarranted, arbitrary restriction of international food trade.
- There are uncertainties of how Traceability/Product Tracing is to be applied: what modalities should be applied, what information needs to be transmitted from one regulatory authority to another and when.
- The requirements for implementing a Traceability/Product Tracing System will raise costs and in the end, consumer prices, reasons why it should be limited to cases where there is no other alternative for attaining the desired purpose.
- The cases where this should apply should be selected for developing countries where most agricultural production is on small farms. This means that economic factors must be taken into account and it should be used as an operational instrument.
- We are of the opinion that the Systems of Risk Analysis and Critical Control Points (HACCP) should be used as alternative systems.

EGYPT

We would like to thank France for its effort in leading the Electronic working group of Codex Committee.

- We are interesting in including "feed" in the definition.
- As the proposed definition is too explanatory and that is not required for a simple definition.

We accept the definition proposed by the United States of America as it is the most simple and proper text for the proposed definition.

JAPAN

Japan believes that "Traceability" is appropriate title for the definition because it exactly describes what we are looking at, that is, whether we can trace the path of a food in the food chain.

As for the definition, Japan is of the opinion that objectives of "Traceability" do not have to be specified in its definition based upon the following reasons:

First, objectives are beyond the scope of the definition, and can and should be examined when we discuss the objectives of "Traceability";

Second, the objectives of "traceability" can be different depending upon the specific needs for the traceability on specific products and do not have to be limited to a few in its definition.

Japan, on the other hand, considers that information identified with a product should be referred to in the definition because certain information conveyed is critically important in terms of deciding whether the food is traceable or not in the food chain.

The information conveyed in the traceability system has to be clearly distinguished between the basic information which is indispensable for ensuring the traceability, and the additional information which gives more value to the traceability system.

The information, which kind of agricultural chemicals or veterinary drugs were used and how they were used, or how crops or animals/fish were produced (organically produced or not, caged or free ranged, caught or farmed etc.), could also be important one to be traced in certain cases. Therefore, information of the production methods, that is, "how it was produced" should be appropriately covered in the definition.

Based upon the above mentioned points, Japan would like to contribute the following definition for “Traceability” and invite extensive comments from the Committee members.

Traceability/Product Tracing:

The ability to ensure, at any stage(s) of the food chain, that the path of a food and the relevant information of the food are known, including:

- Product identification, that is, a unique means to link the information with a single unit of food or lot/batch thereof
- Where and when it came from and where and when it was sent and the other product information if appropriate such as:
 - the raw materials used
 - how it was produced and/or processed
 - the controls, which the product and/or its raw materials has been subject to

URUGUAY

Background

In recent years, many developed importing countries have started to require traceability/product tracing systems as a condition for access for certain agricultural products, especially as a risk management measure for zoonosantary or phytosanitary risk, or information on GMOs and their products. Each importer has been requiring traceability/product tracing systems that were designed according to specific criteria.

This situation has obliged agricultural exporters to implement different requirements according to the destination of their exports, with the attending difficulties related to cost and market access.

In this context, we support the elaboration of specific orientations in Codex on traceability/product tracing to facilitate the harmonization of national schemes and facilitate trade. In addition, we believe that Codex should coordinate its work with OIE and IPPC in this matter. However, we share the concerns of many members (especially those that are food exporters) on the possible implications of the existence of a Codex standard or related text on traceability/product tracing in international food trade, in view of the link between the Codex Alimentarius Commission and the World Trade Organization

Comments to the definition proposed

Uruguay is opposed to advancing on questions that have not yet been resolved in Codex regarding traceability/product tracing, through the definition developed by CCGP.

As Codex has not yet reached a basic understanding of the nature and justification of a standard on traceability/product tracing of foodstuffs, CCGP should at this stage develop a clear and concise definition, limited to essential elements and contributing to future debate and work to be carried out. These conditions are not contemplated in Appendix 1 to document CX/GP 04/20/6.

As regards the second paragraph, Uruguay supports its elimination as it goes beyond the concept of a definition as such and introduces elements on which consensus has not yet been reached in the framework of Codex.

OIE (OFFICE INTERNATIONAL DES EPIZOOTIES)

Traceability is an essential notion to be taken into account when implementing sanitary measures to manage animal health programmes and to ensure the safety of products of animal origin.

In this regard we would like to recall that the Terrestrial Animal Health Code takes this notion into account especially as regards bovine spongiform encephalopathy (BSE). The Code specifies that when importing fresh meat and bovine meat products, veterinary authorities should take into account the presentation of an international veterinary certificate certifying that a traceability system exists in order to trace back the establishment of origin of bovine animals from which fresh meat and meat products for export originate.

Consequently, while noting that the scope of the definition of traceability/product tracing is limited to foodstuffs, the definition could usefully be completed by an additional sentence for products of animal origin, to be inserted before the last paragraph:

“For products of animal origin, the identification of the product and the national identification number of the live animal should match when the animal is slaughtered.

This allows to take into account sanitary events that may occur:

- during product inspection, in order to intervene at the level of the establishment of origin of the animal,
- in the establishment of origin of the animal, and that would warrant the recall of products derived from animals originating from that establishment at the production/processing or consumption stage.