

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
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WORLD
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Agenda Item 5

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COORDINATING COMMITTEE FOR EUROPE

23rd Session, Bratislava, Slovak Republic, 10-13 September 2002

CONSIDERATION OF TRACEABILITY/PRODUCT TRACING

BACKGROUND

1. The 49th (Extraordinary) Session of the Executive Committee considered the question of traceability in the framework of Codex and agreed that Regional Coordinating Committees may wish to contribute to the debate on this question. The Committee on General Principles also referred to the role of the Coordinating Committees and agreed that the results of the discussion in those Committees would be integrated in the discussion paper to be prepared by the Secretariat for consideration by its 18th Session.

2. The Committee is therefore invited to discuss how traceability/product tracing should be approached in the framework of Codex, in the light of the discussions of the Executive Committees and other Committees, as summarized in the present paper.

EXECUTIVE COMMITTEE

3. The 49th (Extraordinary) Session of the Executive Committee (October 2001) discussed how to address the general issue of traceability in the framework of Codex on the basis of a document prepared by the Codex Secretariat. The Executive Committee recommended that the Committee on General Principles consider the following aspects of traceability: as a food safety objective (i.e., as an SPS measure); and as a legitimate objective as a TBT measure. However, the Executive Committee was of the opinion that the first consideration should be given to the use of traceability as a risk management option in the Working Principles for Risk Analysis and also noted that the role of Committee on Food Import and Export Inspection and Certification Systems. The Executive Committee agreed that the Committees concerned (including the Committees on General Principles, Food Import and Export Inspection and Certification Systems, Food Hygiene and Labelling) should undertake work as they deemed appropriate, within their respective mandates (ALINORM 03/3, paras. 29-33).

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COMMITTEE ON FOOD HYGIENE

4. The 34th Session of the Committee on Food Hygiene (October 2001) recalled its previous decision that traceability would be considered in the context of its work on the proposed draft *Principles and Guidelines for the Conduct of Microbiological Risk Management*. However, the Committee was of the opinion that specific work on traceability as related to food hygiene was premature. The Committee therefore reiterated its request to the drafting group that the concept of traceability should be taken into account in the further elaboration of the above Principles and Guidelines (ALINORM 03/13, paras. 170-171).

COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

5. The 10th Session of the Committee (February 2002) had an extensive debate on the application of traceability in the context of food inspection and certification systems and decided that a working group would draft a discussion paper for circulation, comment and further consideration at its next meeting (ALINORM 03/31, paras. 53-67). The Working Group will meet in Fribourg (Switzerland) 19-20 August 2002. An oral report on the outcome of this meeting will be presented to the Coordinating Committee.

AD HOC INTERGOVERNMENTAL TASK FORCE ON FOODS DERIVED FROM BIOTECHNOLOGY

6. The Third Session of the Task Force (March 2002) considered the issue of traceability in the framework of the *Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology* (Section III - Principles - Risk Management).

7. The Task Force was of the opinion that the resolution of this issue was important in order to reach a final conclusion on the text of the Draft Principles. It noted that the addition of a new paragraph after paragraph 20 concerning tools for the implementation and enforcement of risk management measures made it possible to place the question of traceability into context as a one of these tools, leaving aside its use for other purposes. On this basis a compromise text was drafted and accepted by the Task Force. In drafting this compromise text, the Task Force recognized that there were applications of product tracing (traceability) other than the risk management of foods derived from biotechnology, and that these applications be consistent with the provisions of the SPS and TBT Agreements. The Task Force noted that further consideration of these broader issues would continue within Codex (ALINORM 03/34, paras. 22-28).

8. The following paragraphs and footnote were therefore included in the *Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology*:

20. Post-market monitoring may be an appropriate risk management measure in specific circumstances. Its need and utility should be considered, on a case-by-case basis, during risk assessment and its practicability should be considered during risk management. Post-market monitoring may be undertaken for the purpose of:

- *verifying conclusions about the absence or the possible occurrence, impact and significance of potential consumer health effects; and*
- *monitoring changes in nutrient intake levels, associated with the introduction of foods likely to significantly alter nutritional status, to determine their human health impact.*

21. Specific tools may be needed to facilitate the implementation and enforcement of risk management measures. These may include appropriate analytical methods; reference materials; and, the tracing of products¹ for the purpose of facilitating withdrawal from the market when a risk to human health has been identified or to support post-market monitoring in circumstances as indicated in paragraph 20.

¹ It is recognised that there are other applications of product tracing. These applications should be consistent with the provisions of the SPS and TBT Agreements. The application of product tracing to the areas covered by both Agreements is under consideration within Codex on the basis of the decisions of 49th Session of the Executive Committee.

9. The Task Force finalized the Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology and the Draft Guideline for the Conduct of Food Safety Risk Assessment of Foods Derived from Recombinant-DNA Plants and advanced them to Step 8 for adoption by the 25th Session of the Codex Alimentarius Commission.

COMMITTEE ON GENERAL PRINCIPLES

10. The 17th Session of the Committee on General Principles discussed the need to undertake work on traceability/product tracing in the light of the recommendations of the Executive Committee. The Committee discussed in particular whether it should be considered in the framework of risk management as a matter of priority or whether it should be used for other purposes, such as the authenticity of consumer information. The Committee agreed that the Secretariat should prepare a discussion paper for further consideration of this issue at its next session. During the discussion, it was agreed that the results of the discussion in Regional Coordinating Committees would be integrated in the document prepared for consideration by the Committee (ALINORM 03/33, paras. 5-13).

COMMITTEE ON FOOD LABELLING

11. The 30th Session of the Committee considered a background paper prepared by Canada presenting the status of current discussions in Codex Committees. Some delegations proposed to undertake new work on traceability as it was especially relevant for the purposes of labelling, while other delegations expressed the view that it was premature since work was already underway in other committees. Some delegations pointed out that product tracing should be considered primarily as a risk management measure and that further clarification was needed on its application for other purposes before undertaking new work. The Committee could not come to a consensus and agreed to circulate the background document prepared by Canada for comments and to discuss the matter further at its next session (ALINORM 03/22, paras. 4-11).

COMMITTEE ON FISH AND FISHERY PRODUCTS

12. The Committee is currently considering the Draft Code of Practice for Fish and Fishery Products, that includes general requirements and incorporates all current codes of practice for fish and fishery products, surimi and aquaculture. Section 3 of the Code describes the Pre-Requisite Programme based on good hygienic practice that should be established prior to the application of the HACCP system. The Committee agreed to include provisions for product tracing under Section 3.7 *Product Tracing and Recall*. The Section initially referred to "traceability" but the Committee agreed that the reference to product tracing was adequate for the purposes of the Code, taking into account the approach taken in the Intergovernmental Ad hoc Task Force on Foods Derived from Modern Biotechnology. The section refers to product tracing, lot identification and recall in order to allow an effective recall procedure and to address health hazards when applicable. The Draft Code (general sections and three specific sections) was advanced to Step 8 for adoption by the 25th Session of the Commission (ALINORM 03/18, para. 58 and Appendix II).

TASK FORCE ON ANIMAL FEEDING

13. The Proposed Draft Code of Practice on Animal Feeding, currently at Step 3 of the Procedure, contains an extended section on "Traceability (product tracing) of feed and feed ingredients" (Section 4.3). The objective of the provision is to facilitate the prompt trace-back or trace-forward of materials and products if any actual or potential health risks are identified, and prompt and complete withdrawal or recall of products where necessary. At its Third Session (June 2002) the Task Force agreed to add the term "Product tracing" in parenthesis after "Traceability" as an intermediate solution to the discussion on the terminology, taking into account the developments in other Codex bodies.

CONSIDERATION OF TRACEABILITY IN OTHER INTERNATIONAL ORGANIZATIONS

International Organization for Standardization (ISO)

14. The standard definition of "Traceability" used by the Secretariat in its paper to the Executive Committee has since been modified by the ISO with the publication of the new ISO 9000:2000 series of Quality Management Standards. The new Definition is as follows:

Traceability: *ability to trace the history, application or location of that which is under consideration.*

NOTE 1 When considering product (3.4.2), traceability can relate to

— the origin of materials and parts,

— the processing history, and

— the distribution and location of the product after delivery.

NOTE 2 In the field of metrology the definition in VIM:1993,6.10, is the accepted definition."

15. The Regional Coordinating Committee may also wish to note the current work of ISO Technical Committee 34 on Food Products in developing a standard on "Traceability system in the agriculture food chain -- General principles for design and development (ISO/AWI 22519)".