

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

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

Comments in reply to CL 2024/72-FICS

Comments by Australia, Burundi, Canada, Chile, European Union, Japan, Kenya, New Zealand, Peru, Republic of Korea, Rwanda, Singapore, Somalia, Thailand, Uganda United Republic of Tanzania, and ICUMSA, IFT

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2024/72-FICS issued in July 2024. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the Annex

2. The comments submitted through the OCS are hereby attached as Annex I and are presented in table format, while comments received via email have been attached as **Annex II**

ANNEX I

GENERAL COMMENTS

COMMENT	MEMBER/ OBSERVER
Position: Burundi 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: Burundi 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.	Burundi
We have provided detailed comments in the body of the text and in response to specific questions, but also offer the following general comments: • Traceability/Product Tracing (T/PT) is an important tool within a national food control system (NFCS) and contributes to the effectiveness and/or efficiency of associated food safety measures of an NFCS. However, it does not, in and by itself, identify food safety risks or fraudulent/deceptive practices, or provide confidence in the safety and suitability of imported food. We find that parts of the text overstate the role of T/PT or what it can achieve. Canada has proposed some changes within the text to address areas where the contribution of T/PT should be tempered. • Risk is discussed throughout the text, however it is not always clear if, when and how it should be considered. For example, it is not apparent that risk should be taken into account when establishing T/PT requirements that go beyond the minimum necessary for one step forward/one step back T/PT. Whether or not a country considers expanding the T/PT minimum requirements on the basis of risk should be consistently conveyed as optional. Canada has made comments and suggested edits throughout the text to reflect this comment. • Canada agrees that when digital tools and technology are used, interoperability is necessary so that both CA and FBOs can use the data/information easily. However, the draft Principles and Guidelines on T/PT should also clearly convey that the use of digital systems and/or technology for T/PT remains optional in order to provide flexibility to competent authorities and FBOs. • In order to streamline and improve flow of the text, it is suggested to combine the section on "T/PT system design", with the section on "legal requirements" (with a suggested revision of the title). Many of the points in the section on "T/PT system design" should be considered by competent authorities when establishing T/PT requirements within their NFCS, and thus are better placed in the Section on "Legal requirements". • It is suggested to add section numbers (as done in most other codex documents) so that the reader can more easily follow the flow of the document and find the information of interest.	Canada
Kenya notes the extensive work undertaken to date and the continued support for revising and updating CXG 60-2006. Kenya supports the proposed draft revised text presented in Step 3 to move to the next Codex Standard Elaboration process.	Kenya
While New Zealand supports this revision and the intention to provide guidance for Codex members, we are also very aware that this is the first time CCFICS has been presented with a full draft document. It has always been New Zealand's position that Traceability / Product tracing is one of a number of tools that can be utilized by competent authorities within their National Food Control Systems and there are several ways in which such a tool can be designed and implemented – this is also clearly stated within the original CXG 60-2006. New Zealand is therefore a little concerned that the original text relating to the Context (paras 4 – 6) and Rationale (paras 7 – 10) for traceability / product tracing in particular is not adequately reflected in the current draft. We are also concerned that there is significant use of value laden language. New Zealand has made some specific suggestions in an attempt to address this in the Preamble and also the Principles. We also have made some more general comments on other sections of the draft.	New Zealand

ROK supports most of updated version of draft except for one remark. It would be great if the phrase like 'Main objective of the guideline is to provide guidance to the member countries NFCS not requirements or mandatory' is located in the document.	Republic of Korea
Position: Somalia supports the advancement of the draft revised Principles and Guidelines for Traceability/Product Tracing (CXG 60-2006) to Step 5 with the following comments. Rationale: Somalia believes that these revised principles are essential for improving food safety, increasing market access, and promoting transparency in food systems. They are particularly valuable for African countries, where strengthening food inspection and certification is vital for protecting consumers, accessing global markets, and fostering trust among trading partners. Aligning with these international standards contributes to responsible food production.	Somalia
While we agree with the revision and updating of this comment (CXG 60-2006), we have major concerns on this draft document that have to be addressed by CCFICS before it can be advanced to the next step. General comments To be consistent with the scope of the revision of document indicated in the project document, this document should be guidelines providing guidance for Codex member countries on the implementation of traceability/product tracing within NFCS. And, it is expected that the guidance should be flexible and used as a tool for the implementation, rather than establishing mandatory requirements on traceability/product tracing. The guideline in some particular sections such as "Responsibility" and "Legal requirements" should be revised to reflect our concerns.	Thailand
Uganda 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: Uganda 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.	Uganda
The use of square brackets [] is odd and needs further explanation because the association between the use of them isn't clear.	ICUMSA
IFT thanks the committee for the opportunity to comment on the Draft Principles and Guidelines on Traceability/Product Tracing within a National Food Control System (NFCS). IFT would like to remind the committee of IFT's extensive experience with food traceability as the home of the Global Food Traceability Center (GFTC), founded in 2013. IFT is a non-profit scientific organization. It consists of thousands of members, who along with dedicated IFT staff, are committed to creating and upholding a scientifically sound society focused on overcoming barriers to feed our future safely. IFT provides scientific, technical, and career development resources for advancing the science of food and its application across the global food and agricultural systems. IFT's Global Food Traceability Center (GFTC) provides the global food system stakeholders resources, standards, and vision to help improve food safety, diminish risk, avert devastating health consequences and economic loss through enhanced food supply chain traceability. Together, the Institute and its Center believe that science is essential to ensuring a global food supply that is sustainable, safe, nutritious, and accessible to all. The GFTC continues to advance the science and practice of traceability, most recently publishing Tech-Enabled Traceability Insights Report Based on the US FDA's Low- or No-Cost Traceability Challenge in May 2023. Previously, IFT published category-specific guidance for achieving end-to-end traceability in 2014 and the Global Dialogue in Seafood Traceability (GDST) standards in 2020, a business-led, unified standard for seafood traceability. The IFT GFTC will be glad to discuss how it can support Codex and the CCFICS committee and any related EWG's regarding global food traceability issues and questions from our experience working on the topic. We commend the work completed to date in	IFT

the Circular Letter and have provided some additional comments/thoughts regarding the document as outlined in our below comments.

SPECIFIC COMMENTS

COMMENT	MEMBER/ OBSERVER
PREAMBLE New Zealand suggests that the Preamble is potentially trying to do too much. A preamble in general should set the context which is further developed in the guidelines. Similarly, several of the sentences are potentially too long and involve multiple concepts. New Zealand suggests the Preamble could be improved if it was further simplified.	New Zealand
PARAGRAPH 1 1. [Traceability/product tracing consists of acquiring information about food products, which can be retrieved along the supply chain all the way to the consumer.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description. [Traceability/product tracing consists of acquiring information, about the movement of food products, and food product ingredients/inputs, which can be retrieved from food business operators (FBO) along the supply chain all the way to the consumer.][Aus comment: suggests deletion of this sentence unless it is worded to more accurately reflect the definition of Traceability as above]. Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description.	Australia
1. [Traceability/product tracing consists of acquiring information about food products, which can be retrieved along the supply chain all the way to the consumer.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description. Position: Somalia proposes retaining and amending the text within the square brackets by deleting the word "products" after "food" to read: "Traceability/product tracing consists of acquiring information that can be easily retrieved about the movement of food, food ingredients, and packaging along the supply chain all the way to the consumer." Rationale: The term "food," as defined by Codex, is more comprehensive than "food products," which may imply a focus on only finished products. "Food" encompasses any substance, whether processed, semi-processed, or raw, intended for human consumption, including beverages, chewing gum, and any substance used in the manufacture, preparation, or treatment of food. This amendment further clarifies the information being acquired for traceability/product tracing and ensures consistency with other sections of the document, such as clause 10.	Somalia
†Past food incidents have demonstrated that being able to trace food and feed, within a National Food Control System (NFCS) throughout the food chain all the way to consumer can. Traceability/product tracing consists— contribute to the protection of acquiring information about food products consumers against foodborne hazards and fraudulent or deceptive practices, which can be retrieved along the supply chain all the way and to facilitate trade, such as on the consumer basis of accurate product description. ‡ Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description.— There is no need to provide a definition since 'traceability is defined later in the text. It would be relevant to mention, instead, the importance of traceability. A sentence could be introduced here to indicate that in this document, when referring to 'traceability' it should be read 'traceability / product tracing'. That way there would be no need to repeat 'product tracing' throughout the text.	European Union

COMMENT	MEMBER/ OBSERVER
The preamble should lay down the purpose of this guidance. Is it supposed to focus purely on food safety - as an effective tool to manage food incidents/crises? However, traceability is also meant to address fraud and to facilitate trade (purposes other than food safety). Furthermore, going back to the previous CCFICS, the scope of the project document for this paper involved: - The work will foster harmonization and help manage food safety risk, ensuring fair practice in food trade - Promote the use of traceability/product tracing in the context of the whole and/or parts of a National Food Control System (NFCS), as appropriate.	
[Traceability/product tracing consists of acquiring information about food products, which can be retrieved along the supply chain all the way to the consumer.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description. Uganda 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.	Uganda
[Traceability/product tracing consists of acquiring information about food products, which can be retrieved <u>at specified stages</u> along the supply chain all the way to the consumer.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards- <u>health</u> and fraudulent or deceptive ensuring fair practices, and to facilitate trade, such as on the basis of accurate product description. 1. Previous CCFICS meetings agreed that Traceability/product tracing should be applied at any specified stage while retaining on the current principle of “one step back, one step forward”. Thus, the first sentence in a square bracket should be revised, as it covers Traceability/product tracing applied along the supply chain all the way to the consumer which is not corresponded with the purpose and context of the document. 2. To be consistent with the dual purposes of Codex which are protecting the health of consumers and ensuring fair practices in the food trade. We recommend that text regarding “ensuring fair practices in the food trade” should be added to the paragraph, while “the protection of consumers’ health” is already mentioned. 3. Considering these mentioned matters, the paragraph then should be revised to read:	Thailand
[Traceability/product tracing consists of acquiring information about food products, which can be retrieved along the supply chain all the way to the consumer.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description. Kenya proposes an editorial amendment to the text in square brackets to read: Traceability/product tracing consists of acquiring information about the movement of food products, which can be retrieved along the supply chain all the way to the consumer which can easily be retrieved.	Kenya

COMMENT	MEMBER/ OBSERVER
Justification: To qualify the information that is being acquired for traceability/ Product tracing.	
[Traceability/product tracing consists of acquiring information about food products, which can be retrieved along the supply chain all the way to the consumer.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description. New Zealand does not support the inclusion of the first sentence “[Traceability/product tracing consists of acquiring information about food products, which can be retrieved along the supply chain all the way to the consumer.]” noting that traceability/product tracing is already defined in the definition section, and the sentence in square brackets deviates from that definition. New Zealand suggests the second sentence should use the currently accepted Codex terminology and solely talk about protecting the health of consumers and ensuring fair practices in the food trade. Noting that what that means is further developed later in the Preamble.	New Zealand
[Traceability/product tracing consists of acquiring information about food products, which can be retrieved along the supply chain all the way to the consumer.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description. Position: Burundi 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.	Burundi
[Traceability/product tracing consists of acquiring information about food products, which can may be retrieved along applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the supply chain all the way protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to the consumer facilitation of trade on the basis of accurate product description.] Traceability/product tracing may be applied, when and as appropriate, within a National Food Control System (NFCS) to contribute to the protection of consumers against foodborne hazards and fraudulent or deceptive practices, and to facilitate trade, such as on the basis of accurate product description. Canada recommends to delete the first sentence of paragraph 1. “Traceability/product tracing” is defined in the section on “DEFINITIONS”. This sentence introduces wording that reads like an alternate definition of T/PT, and that also seems broader in scope than the actual definition or T/PT. We also propose minor edits to more closely reflect the original text as found in paragraph 2 of CXG 60-2006, that traceability is a tool within the NFCS, and that T/PT contributes to the facilitation of trade on the basis of accurate product description. As currently written, para 1 reads that T/PT “facilitates” trade rather than “contribute to the facilitation of trade”. It is a subtle but important distinction.	Canada
PARAGRAPH 2	
These guidelines are intended to promote good practice, not mandate a single way to conduct traceability/product tracing.	Somalia

COMMENT	MEMBER/ OBSERVER
Position: Somalia proposes that paragraph 2 be removed and addressed in the scope. Justification: The preamble should focus solely on introducing the topic of traceability/product tracing. The statement in paragraph 2 regarding the applicability of the draft revised Principles and Guidelines is more appropriate for the scope section.	
These guidelines are intended to promote good practice, not mandate a single way to conduct traceability/product tracing. Uganda 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	Uganda
These guidelines are intended to promote good practice, not mandate a single way to conduct traceability/product tracing. Kenya 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.	Kenya
These guidelines are intended to promote good practice, not mandate a single way to conduct traceability/product tracing. Position: Burundi proposes that para 2 be deleted and taken to scope. Rationale: 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.	Burundi
These guidelines are intended to promote good practice, not mandate a single-specific way to conduct traceability/product tracing. It is suggested to replace “single” by “specific”.	Canada
PARAGRAPH 3	
In the case of a foodborne illness outbreak or contamination event, efficient traceability/product tracing enables competent authorities and food business operators (FBOs) to rapidly find the source of the contamination event, identify where it may have occurred, and determine the scope and extent of the implicated product distribution. This results in faster, targeted removal of the affected product from the marketplace, thereby reducing incidences of foodborne illnesses. Effective traceability/product tracing helps reduce the scale of removal, thereby mitigating food waste and minimizing costs to producers and others in the food supply chain. In the case of a foodborne illness outbreak or contamination event, efficient traceability/product tracing enables competent authorities and food business operators (FBOs) to rapidly find the source of the contamination event, and identify where it may have occurred, rapid locating of risk product will help determine the scope and extent of the implicated product distribution. This results in faster, targeted removal of the affected product from the marketplace, thereby reducing incidences of foodborne illnesses. Effective traceability/product tracing helps reduce the scale of removal, thereby mitigating food waste and minimizing costs to producers and others in the food supply chain.	Australia
In the case of a foodborne illness outbreak or contamination event, efficient traceability/product tracing enables competent authorities and food business operators (FBOs) to rapidly find the source of the contamination event, identify where it may have occurred, and determine the scope and extent of the implicated product distribution. This results in faster, targeted removal of the affected product from the marketplace, thereby reducing incidences of foodborne illnesses. Effective traceability/product tracing helps reduce the scale of removal, thereby mitigating food waste and waste, minimizing costs to producers and others—other operators in the food supply chainchain and avoiding unnecessary trade disruptions.	European Union
In the case of a foodborne illness outbreak or contamination event, efficient traceability/product tracing enables competent authorities and food business operators	New Zealand

COMMENT	MEMBER/ OBSERVER
(FBOs) to rapidly find the source of the contamination event, identify where it may have occurred, and determine the scope and extent of the implicated product distribution. This results in faster, targeted removal of the affected product from the marketplace, thereby reducing incidences of foodborne illnesses. Effective traceability/product tracing helps reduce the scale of removal, thereby mitigating food waste and minimizing costs to producers and others in the food supply chain. New Zealand notes that the original document CAC/GL 60-2006 recognized traceability as just one tool that helped in investigations and subsequent mitigation of food borne instances e.g. “is a tool that when applied in a food safety context does not in itself improve food safety outcomes unless it is combined with appropriate measures and requirements. It can contribute to the effectiveness and and/or efficiency of associated food safety measures.” (Para 8 of the original document CAC/GL 60-2006). Accordingly, New Zealand supports the original language in CAC/GL 60-2006 particularly the context and rationale which is in paras 4 – 10. But if the new paragraph is preferred then New Zealand suggests the qualification “can help enable” is used in the second line fore “Competent authorities”. Similarly, New Zealand suggest the second sentence should start with “This can facilitate faster, targeted...” as opposed to “This results in faster, targeted...”. Para 3 includes both foodborne illness outbreaks as well as contamination events. New Zealand notes that the rationale for removing product associated with contamination events may not be directly associated with identified foodborne illnesses. New Zealand accordingly suggests that the second sentence could stop at “marketplace”. But if members prefer the current construct New Zealand suggests the words “unnecessary public exposure and” be added after the word “reducing” and before “instances of foodborne illness”. The sentence should also be qualified with the words “can also” before “help” as other factors can also come into play here.	
In the case of a foodborne illness outbreak or contamination event, efficient traceability/product tracing enables—helps competent authorities and food business operators (FBOs) to rapidly find the source of the contamination event, identify where at which step of the food supply chain it may have occurred, and determine the scope and extent of the implicated product distribution. This results in—contributes to faster, targeted removal of the affected product from the marketplace, thereby reducing incidences of foodborne illnesses. Effective traceability/product tracing helps reduce the scale of product removal, thereby mitigating food waste and minimizing costs to producers and others in the food supply chain. Edits suggested for clarity. Traceability, in and by itself, does not enable competent authorities to find the source of the contamination/where it may have occurred, but it can speed up investigative processes to facilitate subsequent action (including sampling and testing for example to determine the source of the contamination and removal of product from the market). Edits are also proposed to clarify the distinction between “source of the contamination event” (e.g., contaminated water or soil) and “where it may have occurred” (i.e., at which step of the food supply chain).	Canada
PARAGRAPH 4	
Robust traceability/product tracing can also act as a deterrent to fraudulent practices and incidents in food supply chains, and as a source of evidence to support investigations when food fraud is suspected or has taken place. Robust traceability/product tracing can also act as a deterrent to fraudulent practices and incidents in food supply chains, and as a means to rapidly locate evidence to support investigations when food fraud is suspected or has taken place.	Australia
Robust traceability/product tracing can also act as a deterrent to fraudulent practices and incidents in food supply chains, and as a source of evidence to support investigations when food fraud is suspected or has taken place. <u>It can also ensure the reliability of information supplied to consumers in terms of substantiating claims made by Food Business Operators.</u> This is also another aspect of the traceability requirement in general.	European Union

COMMENT	MEMBER/ OBSERVER
Robust traceability/product tracing can also act as a deterrent to fraudulent practices and incidents in food supply chains, and as a source of evidence to support investigations when food fraud is suspected or has taken place. Preceding “traceability/product tracing” with the term “Robust” solely as it relates to food fraud could be seen as implying “robust” traceability/product tracing is more important in this circumstance than the others already mentioned. Accordingly, New Zealand suggests deleting the term “robust” and also replacing “can” in the first line with “may”. Similarly, New Zealand suggests deleting “as a source of evidence to support” and adding the qualifier “and can facilitate” in front of the term “investigations” is a more appropriate construct.	New Zealand
Robust traceability/product tracing can also act as a deterrent to help prevent fraudulent practices and incidents in food supply chains, and as a source of evidence to support investigations when food fraud is suspected or has taken place. T/PT in and by itself does not deter fraudulent practices unless combined with appropriate control measures in an NFCS. Canada recommend edits to paragraph 4 to reflect this comment.	Canada
PARAGRAPH 5	
Traceability/product tracing can help increase transparency and confidence in the safety, quality, integrity (including authenticity), and provenance of food by importing countries, thus facilitating trade and potentially adding value for buyers and sellers. Traceability is also used for fraud prevention; thus, integrity and authenticity are relevant concepts to be captured.	European Union
Traceability/product tracing can 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 and sellers. New Zealand suggests deleting Para 5 and Para 6 as they are not essential and would require substantial rework if they were to be retained.	New Zealand
Traceability/product tracing can 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 and sellers. Canada recommends deletion of paragraph 5. It is duplicative of the previous paragraphs which elaborate how T/PT contributes to food safety and fair practices in the food trade, and to trade facilitation. Those paragraphs are equally applicable to imported and domestically produced food. Further, potential added value to buyers and sellers (as indicated at the end of the paragraph) should not be a consideration in Codex texts.	Canada
PARAGRAPH 6	
Traceability/product tracing can facilitate identification of risks related to food production; however, an NFCS requires appropriate measures to improve food safety and fair trade outcomes. An NFCS requires appropriate measures to improve food safety and fair trade outcomes, and traceability/product tracing is a good example of a measure that can facilitate the locating of risks in food production.	Australia
Traceability/product tracing can facilitate identification of risks related to food production; however, an NFCS requires appropriate measures to improve outcomes of food safety and fair trade-outcomes practice in food trade.	Japan
Traceability/product tracing can facilitate identification of risks related to food production; however, an NFCS requires appropriate measures to improve food safety and fair trade outcomes. Canada recommends revising the text of paragraph 6 to place a stronger emphasis that T/PT must be combined with appropriate measures in order to contribute to food safety outcomes or consumer protection. This text balances other paragraph in the preamble which highlight the advantages of T/PT. Canada’s proposal is a condensed formulation of paragraphs 8 and 9 of the current Principles For Traceability/Product Tracing as a Tool Within Food Inspection and Certification Systems (CXG 60-2006).	Canada

COMMENT	MEMBER/ OBSERVER
The edited text should read as: Traceability/product tracing does not in itself improve food safety outcomes or contribute to the protection of consumers against deceptive practices unless it is combined with the appropriate measures and requirements within an NFCS.	
PARAGRAPH 7	
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, the digital technologies rely on guidelines and standards so that the data exchanged are interoperable and are enable communication across the food supply chain. 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 support a response to risks. For this to work, the digital technologies rely on guidelines and standards so that the data exchanged are interoperable and enable communication across the food supply chain.	Australia
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 a role in enhancing traceability to effectively manage and respond to risks. For this to work, the digital technologies rely on guidelines and standards so that the data exchanged are interoperable and are enable communication across the food supply chain. - the second sentence For consistency with the purpose in the project document, the document should remain “the technology neutral”. Thus, rather than emphasizing that the digital tools play an essential part in traceability, the sentence should describe that the digital tools play a role in traceability. As a result, the word “a role” should replace “an essential part” in this sentence. - the last sentence It should be removed from Preamble, because it is unnecessary. - For conclusion, this paragraph therefore should be revised to read:	Thailand
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, the digital technologies rely on guidelines and standards so that the data exchanged are interoperable and are enable communication across the food supply chain. New Zealand suggests removing the word “new” in front of “technology” to ensure that the Guideline is not outdated in five years and also the removal of the word “essential” in the third line as this unsubstantiated emphasis noting that the start of the sentence is qualified by the words “can improve”. Furthermore, New Zealand suggests the last sentence in para 7 should be deleted from the Preamble as it is effectively introducing a recommendation/requirement into the Preamble. New Zealand notes it is already covered later in the Guideline.	New Zealand
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 information and play an essential part in enhancing traceability thus contributing to effectively manage and respond to risks <u>faster removal of an affected product and/or traceback of the affected product and/or ingredients</u>. For this to work, the digital technologies <u>should</u> rely on <u>common</u> guidelines and standards so that the data exchanged are interoperable and are enable communication across the food supply chain.	Canada

COMMENT	MEMBER/ OBSERVER
Canada proposes edits to the first and last sentences of paragraph 7 for clarity. We also recommend deletion of the second sentence since it's content is duplicative of the first sentence.	
La disponibilidad y aplicación de nuevas tecnologías, como las herramientas digitales, pueden facilitar la rastreabilidad/rastreo de productos al permitir un acceso más rápido a la información sobre la cadena alimentaria. Las herramientas digitales pueden mejorar la comunicación a través de las cadenas alimentarias y desempeñar un papel esencial en la mejora de la rastreabilidad para gestionar y responder eficazmente a los riesgos. Para que esto funcione, las tecnologías digitales se basan en directrices y normas para que los datos intercambiados sean interoperables y permitan la comunicación a lo largo de toda la cadena alimentaria. En el último párrafo del número 7, se sugiere cambiar “se basan” por “se deberían basar”. para dar dar más flexibilidad al texto.	Chile
PARAGRAPH 7 BIS	
7bis. This guideline should be read in conjunction with all relevant Codex texts as well as those adopted by IPPC and WOH, as appropriate. This paragraph should be removed, as it does not provide specific relevant texts (adopted by Codex, IPPC and WOH) that should be read in conjunction with this guideline.	Thailand
SCOPE	
<u>Section 2 – SCOPE</u> Added a section number (2).	Canada
8. This document provides guidance to assist competent authorities on establishing traceability/product tracing as part of their NFCS. It also provides guidance to food business operators (FBOs) on implementation of traceability/product tracing within their food operations and throughout the food supply chain. Position: Somalia proposes amendments to the scope to read: This document provides guidance to assist competent authorities in establishing traceability/product tracing as part of their national food control systems. It also guides food business operators on the implementation of traceability/product tracing within their food operations and throughout the food supply chain. These guidelines aim to promote good practices, not mandate a single approach to traceability/product tracing. Justification: The second paragraph of the preamble has been incorporated into the scope where it is more relevant.	Somalia
8. This document provides guidance to assist competent authorities on establishing traceability/product tracing as part of their NFCS. It also provides guidance to food business operators (FBOs) on implementation of traceability/product tracing within their food operations and throughout the food supply chain. Uganda proposes the scope to be ammended 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.	Uganda
8. This document provides guidance to assist competent authorities on establishing traceability/product tracing as part of their NFCS. It also provides guidance to food business operators (FBOs) on implementation of traceability/product tracing within their food operations and throughout the food supply chain. Kenya proposes 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	Kenya

COMMENT	MEMBER/ OBSERVER
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 is adequately covered.	
8. This document provides guidance to assist competent authorities on establishing traceability/product tracing as part of their NFCS. It also provides guidance to food business operators (FBOs) on implementation of traceability/product tracing within their food operations and throughout the food supply chain. Position: Burundi 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. Rationale: Incorporated para 2 of the preamble into the scope where it adequately fits.	Burundi
DEFINITIONS	
DEFINITIONS Position: Somalia proposes that all definitions currently located in the appendix be incorporated into paragraph 9 of the guideline. Additionally, we suggest amending the opening statement of this paragraph to read "The following definitions apply." Justification: The definitions have been used extensively throughout the standard and are more effectively presented within a designated definitions section. This change will enhance clarity and consistency within the document.	Somalia
DEFINITIONS Position: Burundi 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'. Rationale: The definitions have been used in the standard and are better defined within the definitions section.	Burundi
<u>Section 3 – DEFINITIONS</u> Added a section number (3).	Canada
Where words in this document have been defined in previous Codex texts, those definitions apply in this document (see Appendix 1). Otherwise, the following definitions apply: Uganda suggests that all the definitions in the appendix be included in 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 placed within the definitions section	Uganda
Where words in this document have been defined in previous Codex texts, those definitions apply in this document (see Appendix 1). Otherwise, the following definitions apply: Will Appendix 1 be deleted before completion of the text? It is not necessary to keep the Appendix 1 in which definitions are extracted from Procedural Manual and the exiting Codex text.	Japan
En los casos en que la terminología que figura en el presente documento haya sido definida en textos anteriores del Codex, dichas definiciones se aplicarán en el presente documento (véase el Apéndice 1). En caso contrario, se aplicarán las siguientes definiciones: Se sugiere eliminar el Apéndice 1, por lo mismo su referencia. También se sugiere que se reemplace la expresión "se aplicarán" por "se deberían aplicar".	Chile Hacer texto más flexible.

COMMENT	MEMBER/ OBSERVER
Si se considera útil, las definiciones se podrían incluir en la sección definiciones.	
Traceability/product tracing¹: the ability to follow the movement of a food or food ingredient through specified step(s) of production², processing, and distribution³. Footnote 3 on 'distribution', refers to 'customers' indicating business operators that receive food products upon payment. However, distribution also covers the activities of a food bank/redistribution centre which receive food products free of charge. The EUMS therefore propose an alternative wording on footnote 3. (see below)	European Union
Traceability/product tracing¹: the ability to follow the movement of a food or food ingredient through specified step(s) <u>stage(s)</u> of production², processing, and distribution³. Considering the definition of "Traceability/product tracing", "stage" should be used, instead of "step", since "stage" covers all relevant operations and activities along the food chain, including production, processing and distribution. Meanwhile, using "step" in this context may cause confusions with steps of processing in General Principles of Food Hygiene (CXC 1-1969.) Therefore, the definition should be:	Thailand
Traceability/product tracing¹: the ability to follow the movement of a food or food ingredient through specified step(s) <u>stage(s)</u> of production², processing, and distribution³. Definition should be aligned to Codex Procedural Manual.	Japan
FOOTNOTE 3 Distribution includes distribution to the customer <u>level as well as to other receivers free of charge (such as food banks) and up to the consumer</u> level. Can. It can include, among others, handling, storage, and transportation. Footnote 3 on 'distribution', refers to 'customers' indicating business operators that receive food products upon payment. However, distribution also covers the activities of a food bank/redistribution centre which receive food products free of charge. The EUMS therefore propose an alternative wording on footnote 3.	European Union
FOOTNOTE 3 Distribution includes distribution to the customer level. Can include, among others, handling, storage, and transportation. We would like to request for clarification for a reference or source of explanation provided in Footnote 3. In addition, we would like to ask that whether the scope of distribution covers which stage of handling and storage?	Thailand
Traceability/product tracing system: the mechanism established to collect, process, visualize, and analyze traceability data and information. The system established to collect, process, visualize, and analyze traceability data and information.	Australia
Interoperability: the ability to exchange data/information between different data management systems. The storage of data in a format that supports its exchange between different data management systems.	Australia
Interoperability: the ability to exchange data/information between different data management systems. For consistency with the purpose and context in the project document that the document should maintain "the technology neutral" and avoid using technical term such as "Interoperability". In fact, "Interoperability" is a technology term with a specific meaning, while terms used in this document should have common understanding and broad meaning. Therefore, we propose that the definition of "Interoperability" should be removed. Meanwhile the word "Interoperability" should be replaced with "the exchange of data/information" throughout the entire document (such as in paragraph 10).	Thailand
Food supply chain: the range of activities required to take a product from its initial production, through the intermediate phases of production, to delivery to final consumers.	Australia

COMMENT	MEMBER/ OBSERVER
The range of activities required to take a raw material (and any required ingredients) through a production process including the intermediate phases of production, to delivery to consumers.	
Food supply chain: the range of activities required to take a product from its initial production, through the intermediate phases of production, to delivery to final consumers. Canada recommends deleting the definition of “food supply chain”. Terms such as food chain, food supply chain, gate to place, farm to fork, etc. are generally well understood and do not need to be defined.	Canada
PRINCIPLES	
PRINCIPLES New Zealand suggests that Principles should be statements of fact. It appears that the headings are effectively written as the Principle, and the narrative under the headings are provided as a way of further explanation. New Zealand suggests the Principles would be clearer if they were not qualified by the narrative in this section, noting that the Principles are further developed in the subsequent sections. New Zealand does not support the use of value laden qualifier such as “robust” within the narrative and suggests this sentence should start with “Appropriate” instead, noting the importance of traceability/product tracing will in general be proportionate to the risk context.	New Zealand
Section 4 - PRINCIPLES Added a section number (4).	Canada
PARAGRAPH 10	
10 (a) Robust traceability/product tracing that can identify and extract reliable data/information about the sourcing or movement of a food and/or any of its ingredients and packaging, as well as associated process steps, is an important part of a well-functioning NFCS. <u>Traceability/product tracing should at a minimum be able to identify at any specified stage of the food chain from where the food came (one step back) and to where the food went (one step forward), as appropriate to support the NFCS objectives.</u> Para 13 fits well under the Principle a.	Japan
10 (a) Robust traceability/product tracing that can identify and extract reliable data/information about the sourcing or movement of a food and/or any of its ingredients and packaging, as well as associated process steps, is an important part of a well-functioning NFCS. <u>a.bis. Traceability/product tracing should at a minimum be able to identify at any specified stage of the food chain from where the food came (one step back) and to where the food went (one step forward).</u> Canada recommends the addition of principle a.bis. This concept is in paragraph b, but it should be moved after 10.a to be a standalone principle.	Canada
10 (a) Robust traceability/product tracing that can identify and extract reliable data/information about the sourcing or movement of a food and/or any of its ingredients <u>and packaging, as well as associated process steps, along the supply chain</u> is an important part of a well-functioning NFCS. Canada suggest to remove “ and packaging as well as associated process steps” from the paragraph as Canada considers this to be beyond the scope of the definition of food and beyond the scope of tracing one step forward and one step back.	Canada
10 (a) Robust traceability/product tracing that can identify and extract reliable data/information about <u>the sourcing or the</u> movement of a food and/or any of its ingredients and packaging, as well as associated process steps, is an important part of a well-functioning NFCS. It is suggested to delete “sourcing or”, since “movement” covers both backward and forward movement of the food and/or any of its ingredients.	Canada

COMMENT	MEMBER/ OBSERVER
<u>10 (b) Traceability/product tracing should be designed to identify and contain food safety problems: Robust traceability/product tracing can ensure effective and rapid tracing along the supply chain, targeted withdrawals/recalls of unsafe products in a speedy and cost-efficient manner, taking into account the risk involved and maintaining consumer trust in food safety.</u> Traceability/product tracing requirements should be proportionate to risk Traceability requirements being proportionate to risk of a food is an idea that needs further reflexion: Without prejudice to sector-specific rules, proportionality does not apply to traceability itself. The proportionality applies to the action taken once a problem has been identified and traceability is a tool to contain a crisis and take proportional action. Traceability does not itself make food safe. It is a way of assisting in containing a food safety problem. The following alternative text could be suggested: Traceability/product tracing should be designed to identify and contain food safety problems: Robust traceability/product tracing can ensure effective and rapid tracing along the supply chain, targeted withdrawals/recalls of unsafe products in a speedy and cost-efficient manner, taking into account the risk involved and maintaining consumer trust in food safety. Whilst the EUMS recognise that proportionality and a risk-based approach is to be applied for traceability measures in some instances, it is not appropriate to bring it up into this document. The standard is meant to establish and overarching guiding principle that does not go into the granularity of how much information or for how long it has got to be kept. This standard focuses on the one step back/one step forward principle, which must be put in place regardless of the risk. Proportionality is also an ambiguous term to be introduced in the standard. How is it defined or how far-reaching is it? Would it mean that zero traceability could be acceptable if no risk was perceived? The measures in relation to traceability e.g. the number of checks, may be associated to proportionality, but that is different to the requirement of traceability, in general terms, being linked to proportionality.	European Union
10 (b) The extent of tTraceability/product tracing requirements should be proportionate to risk Minor revision to the principle to be consistent with the proposed edits to the explanatory text of the principle in the next paragraph.	Canada
10 (b) Competent authorities and FBOs should consider the risk posed by and to food products and the capabilities and resources of competent authorities and FBOs to manage those risks. At a minimumFor food safety purposes, traceability/product tracing should be one step forward and one step back, <u>at a minimum.</u> As per the comment above, the EU does not agree with the first sentence: When it comes to food safety, traceability itself is not proportionate to risk. Rationale for the changes suggested in the second sentence: Traceability, for purposes other than food safety, e.g. food labelling/origin labelling, goes beyond one step back and one step forward. It could be added that business operators do not have to identify the immediate customers when they are final consumers.	European Union
10 (b) Competent authorities and FBOs should consider the risk posed by and to food products and the capabilities and resources of competent authorities and FBOs to manage those risks. At a minimum, traceability/product tracing should be one step forward and one step back._____ Suggest to move to 'a' and wordings from Para 13 is better stated as Principle.	Japan
10 (b) Competent authorities and FBOs should consider the risk posed by and to food products and the capabilities and resources of competent authorities and FBOs to manage those risks. At a minimum, traceability/product tracing should be one step forward and one step back.Where competent authorities seek to establish T/PT requirements that are more extensive in scope than one step forward and one step back at any specified	Canada

COMMENT	MEMBER/ OBSERVER
<u>stage of the food chain, or that require more complex/detailed information, such requirements should be proportionate to risk.</u> There are too many ideas/concepts included in Principle b., and separating them into different principles would improve clarity. We would suggest the following: 1) that there be a separate principle (a.bis) on minimum traceability requirements instead of a sentence at the end of the principle on risk proportionality; 2) to revise the text on risk proportionality of traceability requirements; and, 3) to delete the reference to consideration of capabilities and resources since the intent of that text is already covered by the contents of principle c./c.bis	
10 (c) Traceability/product tracing should facilitate the exchange of data/information along the food supply chain, including between FBOs and competent authorities. IFT recommends that traceability/product tracing requirements should be proportionate to capacity. Competent authorities should consider institutional capacity for education, training, outreach, financial support, and enforcement; existing technological infrastructure and capability; operational capacity among impacted FBOs.	IFT
10 (c) Competent authorities should consider the entire food supply chain <u>chain, including business operators redistributing surplus foods</u>, when designing and implementing traceability/product tracing within an NFCS. The application of traceability/product tracing should be practical⁴, be technically feasible, be economically viable for a FBO and within an NFCS, and avoid-avoid/minimize unnecessary burdens. It is important to flag that the food chain also includes redistribution organisations such as food banks.	European Union
10 (c) Competent authorities should consider the entire food supply chain when designing and implementing traceability/product tracing within an NFCS: —, c.bis. The application of traceability/product tracing should be practical⁴, be technically feasible, be economically viable for a FBO and within an NFCS, and avoid unnecessary burdens. Canada suggests that the second sentence of this paragraph (i.e., “The application of traceability/product tracing should be practical, be technically feasible, be economically viable for a FBO and within an NFCS, and avoid unnecessary burdens.”) should be a separate principle, c.bis., since it is a separate concept that what is conveyed in the title of principle 10.c.	Canada
FOOTNOTE 4 For example, for raw agricultural commodities that may be comingled during collection. We would like to request for the necessity and clarification for this footnote. Somehow, if it is considered that the footnote is unnecessary, it should be removed.	Thailand
10 (c) Traceability/product tracing should improve communication among the involved parties; improve the standardization, appropriate use, and reliability of data/information; and improve effectiveness and productivity of the organization. It is unnecessary and unclear to include “improve the standardization” in this paragraph. So, it should be deleted to read:	Thailand
10 (c) Traceability/product tracing should improve communication among the involved parties; improve the standardization, appropriate use, and reliability of data/information; and improve effectiveness and productivity of the organization. Canada suggests to delete this paragraph and the two subsequent paragraphs, and to replace them with a principle regarding common data elements (e.g., those elements that are required to be documented for T/PT) and interoperability of different data management systems. Alternatively, these paragraph should be revised to streamline and remove duplicative text/information (including duplication with paragraph c).	Canada
10 (d) Traceability/product tracing should support the exchange of data/information throughout the food supply chain (interoperability). The contexts in para 10d should be revised to be corresponded with our comments on the definition of “Interoperability” mentioned in paragraph 9. The term “Interoperability” can be	Thailand

COMMENT	MEMBER/ OBSERVER
removed and simply replaced by “The exchange of data/information” so the second paragraph of 10d can be read:	
10 (d) Traceability/product tracing should support the exchange of data/information throughout the food supply chain (interoperability) Kenya proposes that Para 12 d and e should be amended and combined to read: d) Ensure their traceability/product tracing system operates as intended and adapt 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:	Kenya
10 (d) Traceability/product tracing should support the exchange of data/information throughout the food supply chain (interoperability) We suggest to delete this principle as we find it is redundant with paragraph c.	Canada
10 (d) Interoperability between systems can support competent authorities of exporting and importing countries and FBOs to exchange data/information across different systems without the need for all entities to be on a single operational, proprietary, or technology platform. Interoperability between systems is ideal, but at a minimum, the data format should be compliant with an agreed data standard such that the data can support competent authorities of exporting and importing countries and FBOs to exchange data/information across different systems without the need for all entities to be on a single operational, proprietary, or technology platform.	Australia
10 (d) Interoperability <u>The exchange of data/information</u> between systems can support competent authorities of exporting and importing countries and FBOs to exchange data/information across different systems without the need for all entities to be on a single operational, proprietary, or technology platform. The contexts in para 10d should be revised to be corresponded with our comments on the definition of “Interoperability” mentioned in paragraph 9. The term “Interoperability” can be removed and simply replaced by “The exchange of data/information” so the second paragraph of 10d can be read:	Thailand
10 (d) Interoperability between systems can support competent authorities of exporting and importing countries and FBOs to exchange data/information across different systems without the need for all entities to be on a single operational, proprietary, or technology platform. <u>The use of common data elements would support interoperability/compatibility between different data management systems and improve efficiency of traceability/product tracing</u> Canada recommends to delete this paragraph. New text is proposed to replace the previous 3 paragraphs.	Canada
10 (e) <u>The implementation of traceability/product tracing within an NFCS should not be more trade restrictive than necessary.</u> The implementation of traceability/product tracing within an NFCS should not be more trade restrictive than necessary. No changes to the text	Canada
10 (f). <u>Different traceability/product tracing systems may achieve the same objectives and outcomes.</u> Different traceability/product tracing systems may achieve the same objectives and outcomes. No changes to the text.	Canada
RESPONSIBILITIES	
Responsibilities New Zealand suggests deletion of the term “legal” as countries may have different mechanisms available to them especially as it relates to providing export assurances. Similarly, in Para 11 b. New Zealand suggests the more appropriate word is “capability” rather than “infrastructure”.	New Zealand

COMMENT	MEMBER/ OBSERVER
Para 12 a. New Zealand suggests that the term “appropriate” should be added in front of the term “traceability/product tracing” noting that the importance of any system will be proportionate to the risk context’. New Zealand is not comfortable with an unqualified reference to those requirements of importing countries, noting hat these are often not known. New Zealand suggests Para 12 a. would be better written as an outcome statement e.g. replacing “when exporting products” with “and so that the traceability/product tracing of exported products can also be facilitated in the importing country.” Para 12 e. New Zealand suggests para 12 e. should be deleted as currently written, there is a degree of redundancy and New Zealand does not understand the full meaning or implication of some of the terms.	
<u>Section 5 - Responsibilities</u> Added a section number (5).	Canada
Competent authorities have <u>should consider</u> the following responsibilities, <u>as appropriate</u>: The document should provide flexible and practical guidance for Codex member countries for implementing traceability/product tracing within a NFCS, while overly rigid should not be taken into account. And, it is significant that the capacity of competent authorities of individual country should be considered, as it varies across different countries. Thus, this section should be revised to read:	Thailand
Competent authorities have the following responsibilities: IFT recommends two additional responsibilities for competent authorities as bullets e. and f. for consideration: e. Define roles for all stakeholders at local, regional, and national level and engage them appropriately in the consultation and development process. f. Establish a regular cadence to review and revise traceability/product tracing system as needed.	IFT
PARAGRAPH 11(a)	
11(a) Establish and implement appropriate legal requirements for traceability/product tracing based on risk. Establish and implement appropriate legislation/regulation to support traceability/product tracing implementation based on risk.	Australia
11(a) Establish and implement appropriate legal requirements for traceability/product tracing based on risk. As per the comments above, it may be that proportionality is relevant for traceability for purposes other than food safety. As per point 14(b) below, the designing of the traceability requirement depends on the purpose behind it. If the purpose is food safety, proportionality to risk should not apply - as any food could be potentially unsafe. If the purpose is something other than food safety, then a proportionality consideration or appreciation of a risk (e.g. risk in terms of potential food fraud) could be relevant.	European Union
11(a) Establish and implement appropriate legal requirements for traceability/product tracing <u>within a NFCS that may include appropriate legal requirements</u> based on risk. The document should provide flexible and practical guidance for Codex member countries for implementing traceability/product tracing within a NFCS, while overly rigid should not be taken into account. And, it is significant that the capacity of competent authorities of individual country should be considered, as it varies across different countries. Thus, this section should be revised to read:	Thailand
11(a) Establish and implement appropriate legal requirements for traceability/product tracing based on risk <u>tracing, as relevant to NFCS objectives</u>. Canada proposes to edit the sentence to be more enabling and for consistency with the principles regarding establishment of the minimum traceability requirements which may not be based on specific risks.	Canada

COMMENT	MEMBER/ OBSERVER
Develop and maintain appropriate infrastructure to access, manage, and assess traceability/product tracing data/information. The word “infrastructure” should be replaced with other words with a broader meaning and greater flexibility, such as “mechanism”.	Thailand
11(b) Develop and maintain appropriate <u>infrastructure processes</u> to access, manage, and assess traceability/product tracing data/information. We recommend replacing “infrastructure” by “processes” to provide flexibility in the means of accessing, managing and assessing T/PT information. T/PT information could be kept in digital form or could be paper-based, however, “Infrastructure” might be interpreted as a system for digital records. We suggest using a more flexible term, e.g., “processes”.	Canada
11(c) Maintain<u>Establish and maintain controls to ensure</u> the confidentiality, as appropriate, of business-sensitive traceability/product tracing data/information when it is shared by an FBO<u>FBO or another competent authority</u>. Proposed edits for brevity and to recognize that confidentiality may need to be maintained in exchanges of T/PT information with FBOs and with other competent authorities.	Canada
12. FBOs have the following responsibilities: Uganda proposes that Para 12 d and e should be amended and combined to read: Ensure Test their traceability/product tracing system it operates as intended and adapt 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.	Uganda
12 (a) Establish and maintain traceability/product tracing systems, <u>including traceability information records</u>, consistent with national requirements and, when exporting products, those requirements of importing countries.	European Union
12 (a) Establish<u>Establish/implement</u> and maintain traceability/product tracing systems, consistent with national requirements and, when exporting products, those requirements of importing countries. Canada recommends to add “implement” to the sentence to ensure this responsibility is articulated for FBOs.	Canada
12 (a) Establish and maintain traceability/product tracing systems, consistent with national requirements<u>requirements, including testing of the system to ensure it operates as intended</u> and, when exporting products, those requirements of importing countries. Proposed edit to include the text from 12.d. into 12.a. for brevity and logical flow of activities.	Canada
12 (b) Share b. Collect from and share relevant data/information with other FBOs in their food supply chain, in accordance with NFCS requirements, as appropriate to enable traceability/product tracing-. <u>This includes collection of information from other FBOS – one step back/one step forward.</u>	European Union
12 (d) Test their traceability/product tracing system to ensure it operates as intended. Test their traceability/product tracing system at a frequency to ensure it operates as intended.	Australia
12 (d) Test their traceability/product tracing system to ensure it operates as intended. Position: Burundi 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 tracingsystem 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.	Burundi

COMMENT	MEMBER/ OBSERVER
Rationale: To make the guideline general and not prescriptive. The merging of the two statements brings more clarity to the new text.	
12 (d) Test their traceability/product tracing system to ensure it operates as intended. Combine 12.d. with 12.a.	Canada
12 (d) Probar su sistema de rastreabilidad/rastreo de productos para asegurarse de que funciona según lo previsto. Se sugiere agregar al final del texto “al menos 1 vez al año”. Es fundamental probar el sistema, para verificar su efectividad, identificar cualquier falla, y asegurar que se encuentre actualizado con las últimas tecnologías y normativas, dado que fomenta la mejora continua del sistema, garantizar el cumplimiento de requisitos legales, fortalecer la confianza de consumidores y socios comerciales, y mitigar los riesgos asociados a una rastreabilidad ineficaz.	Chile
12 (e) Implement the traceability/product tracing system 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. Implement the traceability/product tracing system 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. [Aus comment: this text is confusing and might require explaining or deletion] Identify the data/information that needs to be traced and define the parameters of traceability.	Australia
12 (e) Implement the traceability/product tracing system 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. Position: EAC proposes that Para 12 d and e should be amended and combined to read: Ensure their traceability/product tracing system operates as intended and adapt 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.	Somalia
12 (e) Implement the traceability/product tracing system adapted to their organization, their sector, their supplier profile, customer <u>customer/receiver</u> 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. The addition of 'receiver' is suggested to address food banks that receive foods for free for further distribution.	European Union
12 (e) Implement the traceability/product tracing system 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. We have no opposition, on the retention of Paragraphs 12e in this section.	Thailand
12 (e) Implement the traceability/product tracing system 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. Canada recommends deleting point 12.e. It seems overly prescriptive for this document. It is also a business decision how to implement traceability requirements, as long as requirements are met.	Canada

COMMENT	MEMBER/ OBSERVER
12 (e) Aplicar el sistema de rastreabilidad/rastreo de productos adaptado a su organización, su sector, su perfil de proveedor, los requisitos del cliente (requisitos contractuales) y los requisitos legales. Con base en lo anterior, evaluar las necesidades internas y externas. Identificar los datos o información que deben rastrearse y definir los parámetros de la rastreabilidad. Se sugiere explicar qué se entiende por “parámetros de la rastreabilidad”. No es claro a qué se refiere. Una definición posible es: “Parámetros de rastreabilidad: Se definen como los elementos claves que permiten seguir la historia y el recorrido de un producto a lo largo de su cadena de suministro, garantizando su calidad y seguridad. Estos parámetros incluyen, pero no se limitan a: el número de lote, las fechas de caducidad y de consumo preferente, el origen del producto, el registro de procesos, la identificación del transporte, las condiciones de almacenamiento, el historial de controles de calidad y los datos de distribución.”.	Chile
12 (f) Identify how continuity and confidentiality of data/information will be guaranteed throughout the process steps of the traceability/product tracing system. [Is this an FBO responsibility of the NFCS? It would apply to an FBO if they were vertically integrated but under one step forward and back they most likely cannot achieve this outcome]	Australia
12 (e) Identify how continuity and confidentiality of data/information will be guaranteed throughout the process steps of the traceability/product tracing system. We have no opposition, on the retention of Paragraphs 12f in this section.	Thailand
Identify how continuity and confidentiality of data/information will be guaranteed throughout the process steps of the traceability/product tracing system. We recommend deleting Point 12.f. It is unclear (e.g., what is meant by “process steps”), and seems overly prescriptive, for example in reminding FBOs of the importance of confidentiality. It is an inherent element of doing business. Points 12.a and 12.b already recognize the responsibility of FBOs to implement national requirements.	Canada
LEGAL REQUIREMENTS	
Legal requirements Legislative/regulatory support	Australia
Legal requirements The document should provide guideline to competent authorities and FBOs rather than mandatory requirements. So the title of this section should be reverted back to “Regulatory framework” indicated in the previous draft document (version:1/12/2023) or amended to “Establishing traceability/product tracing within NFCS”.	Thailand
Legal requirements New Zealand suggests that the title “Legal Requirements” should be amended to “Legal or Administrative requirements” noting that the scope of this Guideline include the provision of export assurances which may not always have a legal underpinning. Furthermore, New Zealand believes a Codex document should not in general effectively mandate what a country writes its laws on. References to “legal” in the rest of the section should also have the consequential amendment made.	New Zealand
Legal requirements Codex text may guide countries to establish traceability system at certain level but it is not necessary to be legal requirements. We suggest to amend the subtitle and to move this section under “System design”	Japan
<u>Legal requirements</u>Section 6 - Considerations for the use of T/PT within a NFCS It is recommended to revise the title of this section to be broader in scope than “legal requirements”. It is suggested to insert bullet 16, as the first bullet in this section. It is a key concept and should be the starting point for the competent authority, rather than a good practice. New	Canada

COMMENT	MEMBER/ OBSERVER
text is also proposed for inclusion at the beginning of the section on legal requirements, and would replace bullets 14.c. and 14.d. Thus, the beginning of this Section would read as follows: "Traceability/product tracing should support the objectives of the NFCS and the scope, purpose, objectives and specifications of traceability/product tracing should be clearly described . Competent authorities should consider the following when establishing requirements for the use of traceability/product tracing within their NFCS: • Whether the appropriate legal framework exists or needs to be established to implement traceability/product tracing, including considerations for the protection of confidential business information." It is suggested to include bullets 20 to 22 in this section for logical flow. All the points in bullets 20 to 22 should be considered by competent authorities when establishing requirements for T/PT.	
13. Traceability/product tracing should at a minimum be able to identify at any specified stage of the food chain from where the food came (one step back) and to where the food went (one step forward), as appropriate to support the NFCS objectives. Para 13 should move to under the Principle.	Japan
PARAGRAPH 14	
Key considerations for competent authorities when designing legal requirements for the use of traceability/product tracing within their NFCS include: Key considerations for competent authorities when designing legislative/regulatory requirements for the use of traceability/product tracing within their NFCS include:	Australia
When Key considerations for competent authorities when designing considering that legal requirements for the use of traceability/product tracing within their NFCS is necessary, the following key considerations should include: For flexibility, this paragraph should be revised to read:	Thailand
Key considerations for competent authorities when designing legal requirements for the use of traceability/product tracing within their NFCS include: It is proposed to reword the sentence as: "Competent authorities should consider the following when establishing requirements for the use of traceability/product tracing within their NFCS:"	Canada
the assessed food safety risks and/or the characteristics of the potential fraudulent practices being addressed. It is recommended to delete point 14.a. since it is duplicative of point 15.a.	Canada
14 (a) the purpose of the traceability/product tracing data/information within their NFCS and establishing data/information requirements commensurate with their NFCS needs. It is recommended to delete point 14b. The intent of this point is covered by Paragraph 16, i.e., "Traceability/product tracing should support the objectives of the NFCS and the scope, purpose, objectives and specifications of traceability/product tracing should be clearly described".	Canada
14 (b) whether the appropriate legal framework exists or needs to be established to implement traceability/product tracing. Whether the appropriate legislative/regulatory framework exists or needs to be established to implement traceability/product tracing.	Australia
14 (b) whether the appropriate legal framework exists or needs to be established to implement traceability/product tracing. It is recommended to delete points 14.c. and 14.d. and replace them with the following text, placed at the beginning of the section, as proposed earlier: " Whether the appropriate legal framework exists or needs to be established to implement traceability/product tracing, including considerations for the protection of confidential business information."	Canada

COMMENT	MEMBER/ OBSERVER
14 (d) whether additional data/information protection requirements are needed within the context of national legislation to ensure protection of commercially sensitive data/information. To delete as per comment in previous paragraph, 14.c.	Canada
PARAGRAPH 15	
15. When establishing traceability/product tracing requirements that take account of risk for specific products or sectors, competent authorities and FBOs may want to consider: [Aus Comment: Might be good to have some explanatory text to outline why these elements should be considered in the context of traceability: e.g.: These considerations might help regulators and FBO quickly target potential risk steps of production and avert a larger incident, however the full traceability activities should be undertaken to verify the risk assessment and investigation outcomes.??]	Australia
15. When establishing traceability/product tracing requirements—requirements, for purposes other than food safety, that take account of risk for specific products or sectors, competent authorities and FBOs may want to consider:	European Union
15. When establishing <u>more extensive</u> traceability/product tracing requirements that to take account of risk for specific products or sectors, competent authorities and FBOs may want to consider<u>consider the following</u>: It is recommended to edit the beginning of paragraph 15, for consistency with the proposed revisions to the principles regarding risk proportionality when considering establishing requirements more extensive than the minimum one step back one step forward.	Canada
15 (a) the known risks of a particular food from a food safety and a food fraud perspective<u>perspective (and potential food safety concerns)</u>. This paragraph targets food fraud primarily. However, here one may need also to consider potential links with food safety (e.g. food fraud with substances that are harmful to health. With that in mind, the EU suggests the rewording on point 15(a) so that food safety reference come after food fraud.	European Union
15 (a) the known risks of a particular food from a food safety and a food fraud perspective<u>perspective including the likely or known severity, including health and economic impacts, of a foodborne illness or food fraud attributed to a particular food.</u> It is useful to explain examples of reasons to apply traceability such as contamination or food fraud but the purpose of traceability is not only for prevention of contamination or food fraud. They are just one of examples so we suggest to simplify by combining 'a', 'b', 'e' and 'f' for product focused and 'c' and 'd' for process focused.	Japan
15 (a) the known <u>or assessed</u> risks of a particular food from a food safety and a food fraud perspective. The edit is proposed to account for the deletion of paragraph 14.a.	Canada
15 (b) the likelihood that a particular food has a high potential risk for contamination or food fraud due to the nature of the food or the processes used to produce such food.	Japan
15 (c) the step in the manufacturing or distribution process of the food where contamination or food fraud is most likely to occur<u>occur or to reduce possibility</u>.	Japan
15 (d) the likelihood of contamination or food fraud and steps taken during the manufacturing or distribution process to reduce the possibility<u>probability</u>. The 'possibility' will still be there. 'Probability' might be a more suitable word.	European Union
15 (d) the likelihood of contamination or food fraud and steps taken during the manufacturing or distribution process to reduce the possibility.	Japan
15 (e) the likelihood that consuming a particular food will result in a foodborne illness due to contamination of the food.	Japan
15 (f) the likely or known severity, including health and economic impacts, of a foodborne illness or food fraud attributed to a particular <u>food or the circumstances around the distribution of</u> food.	European Union

COMMENT	MEMBER/ OBSERVER
The circumstances concerning the food distribution could also be an element that may need to be taken into account (freezing during transportation etc.).	
15 (f) the likely or known severity, including health and economic impacts, of a foodborne illness or food fraud attributed to a particular food.	Japan
15 (f) the likely or known severity, including health and economic impacts, of a foodborne illness or food fraud attributed to a particular food. It is recommended to move paragraphs 23 to 25 and include them in this section, following paragraph 15 on risk considerations.	Canada
GOOD PRACTICE	
PARAGRAPH 16/17	
Good practice What is “Good practice” aiming for? Para 16 may move to under Principle and Para 17-19 may move to under the Cooperation.	Japan
16 Traceability/product tracing should support the objectives of the NFCS and the scope, purpose, objectives and specifications of traceability/product tracing should be clearly described. The scope, purpose, objectives and specifications of traceability/product tracing should be clearly described and support the objectives of the NFCS.	Australia
16 Traceability/product tracing should support the objectives of the NFCS and the scope, purpose, objectives and specifications of traceability/product tracing should be clearly described. See comment # 42. This sentence should be moved to the beginning of the section on “legal requirements”. It is a key recommendation for competent authorities when they are considering the use of T/PT.	Canada
17. The application of traceability/product tracing should consider the capabilities of developing countries. [This is covered by paragraph 18.]	Australia
PARAGRAPH 18	
18. The objectives, scope and related procedures for traceability/product tracing in an NFCS should be transparent and made available to competent authorities of the exporting country upon request. If, an importing country has objectives or outcomes of their NFCS which cannot be met by an exporting country, the importing country should consider the provision of assistance to the exporting country, especially in the case of a developing country. Assistance may include longer time frames for implementation, flexibility of design, and technical assistance, so that the objectives or outcomes of the NFCS of the importing country can be met. [comment: moved up to be with 17 as both referencing developing countries]	Australia
18. The objectives, scope and related procedures for traceability/product tracing in an NFCS should be transparent and made available to competent authorities of the exporting country upon request. New Zealand is not comfortable with the concepts introduced in Paras 18 and 19 which could be interpreted as legitimizing the transboundary regulation of one country to another. New Zealand would prefer any such statements were made in an outcome focused way.	New Zealand
18. The objectives, scope and related procedures for traceability/product tracing in an NFCS should be transparent and made available to competent authorities of the <u>importing and</u> exporting country upon request. Suggest to add importing country since understand the system of traceability and product tracing are useful for both countries.	Japan
18. The objectives, scope and related procedures for traceability/product tracing in an NFCS should be transparent and made available to competent authorities of the exporting country upon request.	Canada

COMMENT	MEMBER/ OBSERVER
It is recommended to move paragraph 18 to the Principles section or the Communications Section. Transparency of measures is an obligation and not a good practice.	
PARAGRAPH 19	
19. If, as related to traceability/product tracing, an importing country has objectives or outcomes of their NFCS which cannot be met by an exporting country, the importing country should consider the provision of assistance to the exporting country, and especially in the case of a developing country. Assistance may include longer time frames for implementation, flexibility of design, and technical assistance, so that the objectives or outcomes of the NFCS of the importing country can be met. Suggest to delete parts relevant to the equivalent assessment which should be explained in the Equivalent document.	Japan
19. Si, en relación con la rastreabilidad/rastreo de productos, un país importador tiene objetivos o resultados de su SNCA que no pueden ser alcanzados por un país exportador, el país importador debe considerar la prestación de asistencia al país exportador, y especialmente en el caso de un país en desarrollo. La ayuda puede incluir plazos de aplicación más largos, flexibilidad en el diseño y asistencia técnica, de modo que el SNCA del país importador pueda alcanzar los objetivos o resultados previstos. Se sugiere que en español diga “debería”. Es la definición adecuada, como lo señala el inglés.	Chile
TRACEABILITY/PRODUCT TRACING SYSTEM DESIGN	
<u>Traceability/product tracing system design</u> New Zealand suggests that this section goes into too much detail and should be simplified.	New Zealand
<u>Traceability/product tracing system design</u> It is recommended to move paragraphs 20 to 22 to the section on “legal requirements”. These paragraphs include the key considerations of competent authorities when establishing requirements for the use of T/PT in their NFCS.	Canada
PARAGRAPH 21	
When determining the traceability/product tracing data/information to be maintained and collected, competent authorities may want to consider: IFT recommends consideration of the addition of a bullet point under paragraph 21 as follows: g. Reviewing the traceability requirements associated with NCFS of relevant importing and/or exporting nations (5) and pre-competitive initiatives (6). Competent authorities may want to consider aligning the traceability/product tracing data/information to be maintained and collected with existing practices and regulations. Footnote: 5 [An example traceability/product tracing data requirements associated with a National Food Control System is the U.S. Food & Drug Administration FSMA Final Rule on Requirements for Additional Traceability Records for Certain Foods FDA] 6 [Examples of pre-competitive initiatives that have established traceability requirements include the Global Food Safety Initiative and the Global Dialogue on Seafood Traceability]	IFT
Defining situations when FBOs will be requested to provide data/information to the competent authority, such as during an investigation of a foodborne outbreak, to identify products subject to recall<u>recall/withdrawal</u>, or to identify food fraud.	European Union
21 (a) Definir las situaciones en las que se pedirá a los OEA que faciliten datos/información a la autoridad competente, por ejemplo, durante una investigación de un brote de origen alimentario, para identificar productos sujetos a retirada o fraudes alimentarios. Para hacer más claro el texto. Se sugiere que desde la última coma se indique “para identificar las causas de este, las etapas en que se produjo la situación, los productos sujetos a retirada o fraudes alimentarios”.	Chile

COMMENT	MEMBER/ OBSERVER
21 (b) The minimum data/information necessary to establish traceability/product tracing sufficient to manage specific risks. Paragraph 21 (b) should be reworded to make sure that for food safety purposes proportionality is not a consideration. For other purposes, this could be a consideration.	European Union
21 (b) The minimum data/information necessary to establish <u>one step back one step forward</u> traceability/product tracing sufficient to manage specific risks <u>tracing</u>. Proposed edit for consistency with the revised principles to indicate that one step back and one step forward is the minimum requirement.	Canada
21 (c) Establishing requirements for common data/information to be shared between FBOs to facilitate traceability/product tracing. Competent authorities may want to consider establishing data/information requirements that allow for linking between products as they move through the food supply chain, such as production, batch, or lot codes. Canada suggests deleting the second sentence in paragraph 21.c., since it is duplicative of the first sentence of 21.c. and also duplicative of 21.e.	Canada
21 (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)? Due to the different role of FBOs, the burden will be different. However, it might be worth explaining that the requirement will be the same e.g. one step back and one step forward.	European Union
21 (e) How data elements should be linked (at a minimum, one step forward, one step back) within an FBO's records and across the food supply chain, based on the FBO's role. It is recommended to re-order the flow of sub-elements in paragraph 21; paragraphs 21.e. and 21.f. should follow paragraph 21.b. for flow and continuity of ideas.	Canada
PARAGRAPH 22	
22 (a) What data requirements and conventions should be in place to ensure useability and reliability of the data/information (interoperability)? Canada recommends deleting "and conventions" in this context as this term has not been used within this document and "requirements" accurately conveys what should be in place.	Canada
22 (a) ¿Qué requisitos y convenciones en materia de datos deben establecerse para garantizar la utilidad y fiabilidad de los datos/información (interoperabilidad)? a) No se emite respuesta al respecto.	Peru
22 (b) Si los registros deben conservarse en papel o en formato electrónico. b) Deberían poder conservarse en ambos formatos.	Peru
22 (c) ¿Cómo y en qué formato presentarán los OEA los datos/información a la autoridad competente, cuando esta lo solicite? c) Se considera que no sería necesario establecer un formato. La Directiva Sanitaria 147 sobre la rastreabilidad para la inocuidad de los alimentos, señala que "Los registros y documentos que sustentan la rastreabilidad de los alimentos elaborados industrialmente, forman parte de los sistemas de control sanitario que aplican los proveedores y deben estar a disposición de la autoridad competente hasta el doble de tiempo de vida útil...".	Peru
22 (d) ¿Qué requisitos de seguridad de datos/información deben establecerse para proteger datos/información confidencial? d) No se emite respuesta al respecto.	Peru
23 Un sistema de rastreabilidad/rastreo de productos debe ser tecnológicamente neutro para que pueda ser utilizado por los OEA, independientemente de sus recursos o limitaciones. Un sistema tecnológicamente neutro también permitirá adaptarse a los avances tecnológicos.	Chile

COMMENT	MEMBER/ OBSERVER
No queda claro qué se entiende por “sistema tecnológicamente neutro”. Se podría considerar la siguiente definición: “Sistema tecnológicamente neutro: Es el sistema que no discrimina entre diferentes tecnologías y que permite su desarrollo y uso de manera equitativa, proporcionando un entorno propicio para la innovación y la adaptación a futuros avances tecnológicos”.	
PARAGRAPH 24	
24 [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 standards⁵ as a benchmark for their traceability/product tracing. Position: Somalia proposes modifying the text within 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. Competent authorities may consider utilizing international data standards⁶ as a benchmark for their traceability/product tracing." Justification: This revised text simplifies the paragraph by avoiding prescriptive language regarding data sharing, while still encouraging the standardization of data formats and meanings to enhance interoperability.	Somalia
24 [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 standards⁵ as a benchmark for their traceability/product tracing. Uganda 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 differentorganizations).] 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.”	Uganda
24 [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 standards⁵ as a benchmark for their traceability/product tracing.— No need to keep this paragraph. The text should be worded in terms of the goal and/or intended result, rather than in terms of prescribing how that result may be achieved. A more general approach allows a greater flexibility in the implementation of the requirement and is thus likely to reduce compliance costs. However, it requires both food businesses and the control authorities to take an active role in ensuring effective implementation.	European Union
24 [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	Thailand

COMMENT	MEMBER/ OBSERVER
want to consider utilizing international data standards⁵ as a benchmark for their traceability/product tracing. The proposed text in a square bracket is unnecessary are not in the line with the propose of technology neutral, so it should be removed. Then, this paragraph should be revised to read:	
24 [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 standards⁵ as a benchmark for their traceability/product tracing. Kenya 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, competent authorities may consider utilizing international data standards 6 as a benchmark for their traceability/product tracing. Justification: This is to simplify the paragraph.	Kenya
24 [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 standards⁵ as a benchmark for their traceability/product tracing. 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 differentorganizations).]Competent authorities may want to consider utilizing international data standards6 as a benchmark for their traceability/product tracing.” Rationale: 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.”	Burundi
24 [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 standards⁵ as a benchmark for their traceability/product tracing. We find the text in brackets para 24 to be complex and confusing. It is recommended to delete it.	Canada
FOONOTE 5	
[An example of a body that has developed data standards is GS1]. Footnote 5 should be removed, as it provides an example of a private organization developing data standards considering unnecessary for this document.	Thailand
INFORMATION PROTECTION	
26. Competent authorities must establish appropriate security measures to ensure the confidentiality and protection of data/information provided from FBOs and other stakeholders. Competent authorities may want to consider whether their national legislation includes sufficient information protection provisions. Under paragraph 26, it might be worth including that for reasons of public interest, information about certain products may need to be communicated to the public.	European Union

COMMENT	MEMBER/ OBSERVER
26. Competent authorities must establish appropriate security measures to ensure the confidentiality and protection of data/information provided from FBOs and other stakeholders. Competent authorities may want to consider whether their national legislation includes sufficient information protection provisions. New Zealand suggests that para 26 effectively covers multiple other paragraphs already stated throughout the document and that the document should be reviewed to remove any unnecessary redundancies. The word “must” is not Codex language, New Zealand suggests that this is replaced with “should”.	New Zealand
26. Competent authorities must establish appropriate security measures to ensure the confidentiality and protection of data/information provided from FBOs and other stakeholders. Competent authorities may want to consider whether their national legislation includes sufficient information protection provisions. Paragraph 26 could be deleted since its intent would be addressed in a new bullet point that Canada has suggested including in the Section on “Legal requirements” (“Whether the appropriate legal framework exists or needs to be established to implement traceability/product tracing, including considerations for the protection of confidential business information.”)	Canada
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. <u>27bis. To safeguard personal data and business-sensitive information, the exchange of traceability/product tracing data and information between competent authorities should be restricted only to what is necessary.</u> This is intended to ensure that only necessary information shall be shared between competed authorities. This aligns with the principles outlined in CAC/GL 19-1995, which emphasize the careful and necessary exchange of information.	European Union
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. New Zealand suggests the words “may be needed” be deleted and the words “may help” be added after the term “competent authority”. While New Zealand has confidential information sharing agreements with a number of countries such agreements are not universally commonplace.	New Zealand
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 that confidentiality of relevant data protection and security is maintained. It is suggested to simplify the sentence in Paragraph 27. This sentence could also be combined with paragraph 30. Thus, a section on “information protection” would no longer be needed since its contents are addressed in other sections/paragraphs.	Canada
27. Además, pueden ser necesarios acuerdos de intercambio de datos/información entre las autoridades competentes para proporcionar un mecanismo robusto de gobernanza que permita el intercambio de datos/información a través de la cadena alimentaria, proporcionando las garantías necesarias sobre la seguridad y protección de datos. Se sugiere eliminar. El párrafo 26 es claro y suficiente al respecto.	Chile
COMMUNICATION AND COOPERATION	
Singapore would like to reiterate our comments at EWG to include the roles of FBOs in communication as food safety is a joint responsibility, and FBOs would have a critical part to play: A) FBOs have the responsibility to notify their competent authorities and provide the necessary information when they are conducting voluntary recalls. B) FBOs should have responsibility in communicating to their counterparts e.g. when a product recall is triggered	Singapore

COMMENT	MEMBER/ OBSERVER
C) FBOs should play a part in communications with consumers in the event of a product recall, e.g. communicating the food safety risks of their products and actions to be taken by consumers who have purchased these products.	
Paragraph 30	
30. 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.] Position: Somalia suggests retaining the text within the square brackets. Justification: This text offers additional guidance and is valuable for users.	Somalia
30. 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.] Uganda Proposes the retention of the text in the square brackets. Justification: It provides further guidance and is important to the user.	Uganda
30. 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.] The sentence in brackets may be kept.	European Union
30. 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.] Kenya proposes the retention of the text in the square brackets: Justification: It provides further guidance.	Kenya
<u>30. In case of food safety incident, cCompetent ompetent</u> 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.] It should be prioritized the situation relevant to the food safety incident.	Japan
30. 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	Burundi

COMMENT	MEMBER/ OBSERVER
might want to refer to CXG 19: 1995, Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations.] Position: Burundi proposes the retention of the text in the square brackets. Rationale: It provides further guidance and is important to the user.	
Annex 1: Definitions	
Annex 1: Definitions If it is considered that specific definitions in Annex 1 are needed, they should be moved to Definition section which footnotes should be added to provide references of relevant definitions.	Thailand
Annex 1: Definitions New Zealand suggests that this Annex is unnecessary as these terms are already defined in other Codex documents.	New Zealand
Annex 1: Definitions Suggest to delete after completion of the text.	Japan
Annex 1: Definitions Canada does not see a need to maintain these definitions in the Annex. They are found in fundamental Codex texts, and the text on traceability should always be considered in association with the General Principles on Food Hygiene (CXC 1-1969).	Canada

ANNEX II

Rwanda

Rwanda takes note of the extensive work undertaken to date and the continued support for the work to revise and update CXG 60-2006.

United Republic of Tanzania

Position: The TANZANIA 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 TANZANIA 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: TANZANIA 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: TANZANIA 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: TANZANIA 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: TANZANIA 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: TANZANIA 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: TANZANIA 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: TANZANIA Proposes the retention of the text in the square brackets.

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