European Community Comments for the Codex Alimentarius Commission, Geneva, 2-7 July 2001 - Agenda item 11: Matters arising from other Codex Committees and Task Forces: European Community Comments on Traceability

The European Community welcomes that traceability is discussed in the Codex Alimentarius Commission. Recent food scares have demonstrated that the identification of the origin of feed, food, including ingredients and food sources is of prime importance for the protection of consumer health and the establishment of consumer confidence.

The EC believes that traceability is an instrument of risk management, health protection of the consumer as well as fair trade and as such relevant to international trade. It has been discussed in several Codex Committees and Task Forces (for instance CCFL, CCFFP, TFAF, TFBT and CCFH) The Executive Committee suggested traceability for consideration in the next Codex Alimentarius Medium Term Plan. The Task Force on Foods derived from Biotechnology agreed that traceability was "a broad, horizontal issue and should be discussed on a Codex wide basis" (draft ALINORM 01/34, page 10).

Definition and purpose of Traceability

The EC supports the definition of traceability provided by the International Organization for Standardization: "ability to trace the history, application or location of an entity by means of recorded identification." ¹ or more specifically as the ability to trace a food, feed, food-producing animal or ingredients, through all stages of production and distribution ².

The Task Force on Foods derived from Biotechnology confirmed that the concept of traceability was "a system which guarantees a continuous flow of appropriate information at all stages of placing on the market of foods" (draft ALINORM 01/34, page 10).

Moreover traceability should aim at limiting discontinuity of the information throughout the food supply chain. In practice the term traceability stands for a system of record keeping and documentation by operators that enables tracking of the movement of a product or ingredient through the food chain.

Traceability should be applicable to all foodstuffs and feedingstuffs.

Importance of traceability in international trade

Experience has shown that the functioning of trade in food can be jeopardised if it is impossible to trace food and feed. For instance, the dioxin contamination, or the StarLink corn problem. It is therefore necessary to establish a comprehensive system of traceability so that targeted and accurate withdrawals can be undertaken or information given to consumers or control officials, thereby avoiding the potential for unnecessary wider disruption in the event of food safety problems.
Traceability is also related to fair trade. Traceability enables consumers to be provided with targeted and accurate information concerning concerned products. This is especially important in cases where the consumer is willing a higher price for products that are produced under certain guaranteed circumstances such as organically produced foods.

Verifiable documentation is an important element in an effective food control system as well as the HACCP principles. This means that food operators should ensure at each stage of the production chain, that relevant information is provided in the form of labelling or accompanying documentation and that operators transmit and retain the relevant information at each stage of the placing on the market.

**Codex guidelines on traceability**

Traceability should allow a focused withdrawal of products, especially for food safety reasons and facilitate the preservation of the identity of specific products (e.g. from approved country/ establishment). This would fall under the scope of the Codex Committee on Import and Export Certification Systems (CCCFICS).

Traceability can assist the verification of labelling (not misleading or incorrect or accordance with the relevant Codex standards and guidelines, e.g. organically produced foods). This would fall under the scope of the Codex Committee on Labelling (CCFL) or the relevant Commodity Committees or Task Forces.

Traceability should further facilitate the identification of unintended and long-term effects on human health, where appropriate support the development of adequate risk management measures. This would be a task related to the Codex Committee on General Principles (CCGP).

In summary traceability is of general importance for various Codex Committees and Task Forces. Traceability is linked to risk management, health protection of the consumer, labelling, food quality, fair trade and import and export certification etc.

Therefore, the European Community supports the general approach proposed by the Secretariat and would like to propose the following:

- The Codex Committee on General Principles should consider the general objectives of traceability provisions and when and to what extent traceability could be considered as a risk management tool and as a mean to ensure fair practices in the food trade, and should develop general guidelines on traceability. These guidelines should be designed in such a manner that they later allow for more specific provisions on traceability to be developed for particular cases in the relevant Codex Committees.
- The Codex Committee on Food Hygiene and the Codex Committee on Food Labelling should examine whether and to what extent traceability requirements currently included in their general and specific texts may need to be clarified and strengthened.
The Codex Committee on Food Import and Export Inspection and Certification Systems should consider in particular the reference to the use of official inspection and certification requirements to ensure the integrity of traceability.

In addition, the European Community would like to stress the importance of the need to develop works and trials on the feasibility and cost of traceability in particular of food and feed derived from biotechnology.

1 ISO standard 8402: 1994

2 From and including the primary production of a food, up to and including its sale or supply to the final consumer and the production, manufacture and distribution of feed.