

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
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**AGENDA ITEM NO. 2**

**CX/FL 02/2-ADD.2**

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**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON FOOD LABELLING  
THIRTIETH SESSION  
HALIFAX, CANADA, 6 - 10 MAY 2002**

**MATTERS REFERRED BY THE CODEX ALIMENTARIUS  
COMMISSION AND OTHER CODEX COMMITTEES:**

**FOOD LABELLING AND TRACEABILITY  
(BACKGROUND PAPER PREPARED BY CANADA)**

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### **FOOD LABELLING AND TRACEABILITY (BACKGROUND PAPER PREPARED BY CANADA)**

#### **PURPOSE**

1. The purpose of this paper is to provide background for the *Codex Committee on Food Labelling (CCFL)* regarding the matter of labelling and product traceability.

#### **BACKGROUND**

2. Increased attention has been directed to the subject of product traceability or trace-back systems by a number of Codex Committees and Task Forces during the past several years. Further to these discussions, the *Executive Committee of the Codex Alimentarius Commission (CCEXEC)*, at its 49<sup>th</sup> (Extraordinary) Session, September 26 - 27, 2001, noted that the Secretariat paper (ALINORM 01/21 Part IV Add.1) on the matter had been prepared at the specific request of the *Codex Committee on Food Import and Export Certification and Inspection Systems (CCFICS)*, but treated the issue as a general issue confronting Codex. The paper summarized the prior work and current discussions on the subject of traceability within Codex. It pointed out that traceability was not new to Codex but that it had not been treated in a systematic manner. The paper also pointed out that any measures requiring traceability should be justified as:
  - a) having a food safety objective (i.e., as an SPS measure); or
  - b) having a legitimate objective as a TBT measure.
3. The Executive Committee generally supported the analysis and approach outlined in the Secretariat paper. There was a divergence of views between Members about the usefulness and application of traceability. Some Members drew attention to the implications for developing countries, in particular cost, the ability to meet traceability requirements and the potential negative impact on trade.
4. The Executive Committee recommended that the *Codex Committee on General Principles (CCGP)* consider the two aspects of traceability referred to above; however, it was the opinion that first consideration should be given to the use of traceability as a risk management option in the Working Principles for Risk Analysis. The Executive Committee also noted, in particular, the role of the CCFICS in relation to the development of procedures for the application of traceability in food import and export inspection and certification systems. Although some Members believed that a sequential approach to the development of other texts should be followed, the Executive Committee

agreed that it should be for the Committees concerned (including the CCGP, CCFICS, *Codex Committee on Food Hygiene (CCFH)* and *CCFL* to undertake work as they deemed appropriate within their respective mandates.

5. The Executive Committee welcomed the suggestion that the Chairpersons of the Committees concerned and the Codex Secretariat should coordinate work so as to avoid a divergence of approach. The Executive Committee agreed that Regional Coordinating Committees may wish to contribute to the debate on the issue. It also noted the usefulness of a proposal for workshops to be held at the regional level using case studies of traceability as these would contribute to a clarification of the economic impact and technical application, and contribute to improved understanding.

6. CCFICS considered traceability at its 10<sup>th</sup> Session (25 February - 1 March 2002) (paragraph 67, ALINORM 03/30):

“Considering the relevance of this issue for CCFICS and consistent with the mandate provided by the CCEXEC to identify specific areas for the application of traceability to inspection and certification systems in relation to food safety issues, the Committee decided that a Working Group led by Switzerland, with the assistance of....\*....should draft a discussion paper for circulation, comment and further consideration at its next meeting. The Committee agreed that the discussion paper should specifically address:

- the adequacy and applicability of traceability in existing or pending texts under elaboration by the CCFICS;
- on the basis of the above review, the appropriateness for CCFICS to develop specific guidance on the practical implementation of traceability with respect to food import and export inspection and certification systems, with priorities to be developed in light of the above discussion;
- the outcome of the Chairpersons meeting from the relevant Codex Committees that was scheduled to meet prior to the 17<sup>th</sup> session of the CCGP on traceability;
- a time-frame for any new work that CCFICS could undertake with the understanding that this work should not duplicate the work being undertaken by other Committees.”

7. The Third Session of the *Ad hoc Intergovernmental Task Force on Foods Derived from Biotechnology* (March 2002) considered the issue of traceability in the framework of the *Draft Principles for the Risk Analysis of Foods Derived from Modern Biotechnology*, Alinorm 03/34, Appendix II (Section III - Principles - Risk Management). It agreed to include the following paragraph in the Draft Principles:

\* [see CCFICS report for list of members and international organizations]

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

The Task Force also recognized in a footnote: *“...that there are other applications of product tracing. These applications should be consistent with the provisions of the SPS and the TBT Agreements. The application of product tracing to the areas covered by both Agreements is under consideration within Codex on the basis of the decisions of the 49<sup>th</sup> Session of the Executive Committee.”*

8. The CCGP again discussed the subject of traceability at its session in April, 2002 and requested the Secretariat to draft a further discussion paper on traceability for the purpose of food safety and other purposes, for consideration at its next session. The Secretariat was also asked to provide a draft definition for Codex use.

#### **TRACEABILITY AND LABELLING**

9. The Secretariat paper referred to above notes that: *“According to ISO, traceability can entail high costs. A decision to apply traceability should therefore be justified and the justification documented. Clearly, within the Codex context, consideration must be given to the reasons for applying traceability for food products and the extent to which traceability is to be required as part of a food standard, code of practice, food labelling text or similar document. Such reasons must lie within the overall mandate of the Commission, namely: To protect the health of consumers and ensure fair practices in the food trade.”*
10. The paper also notes that: *“The extent to which traceability may be applied to protect the health of consumers may be considered as part of a food safety risk management decision.”*; and further that: *“The use of traceability to ensure fair practices in the food trade correlates to the prevention of deceptive practices as a legitimate objective described by the WTO Agreement on Technical Barriers to Trade.”*
11. A number of Codex labelling texts for prepackaged foods include product tracing provisions. While in most cases these provisions are linked to product origin, identification and recall procedures as food safety risk management tools to protect the health of consumers, they also support the Codex objective of ensuring fair practices in the food trade by preventing deceptive practices.
12. Examples include:  
  
*-Codex General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985, Rev. 1-1999): Section 4.4 Name and Address, Section 4.5 Country of Origin, Section 4.6 Lot Identification;*

-*Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods (GL 32-1999, Rev.1-2001)*: Annex 3 A. Production Units, paragraphs 6 and 7; Annex 3 B. Preparation and Packaging Units, paragraph 2;

- In addition to the country of origin labelling provisions of the *Codex General Standard*, specific country of origin labelling provisions have been established for some commodities, notably in the standards for fresh fruits and vegetables and in the standards for some milk products. For example, the *Codex Standard for Bananas* (CODEX STAN 205-1997): Section 6.2.3 Origin of Produce; the *Codex General Standard for Named Variety Process(ed) Cheese and Spreadable Process(ed) Cheese* (CODEX STAN A -8(a)-1978): Section 6.5 Country of Manufacture, Section 6.7 Lot Identification.