

CCFICS 27
CAIRNS 

16-20 SEPTEMBER
2024



Food and Agriculture
Organization of the
United Nations



World Health
Organization

CODEX
ALIMENTARIUS
INTERNATIONAL FOOD STANDARDS

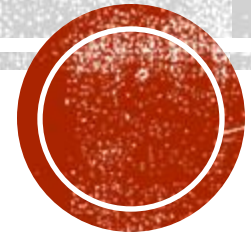
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ANALYSIS OF AGENDA ITEMS



5 September 2024

Prof. Samuel Godefroy, Ph.D. | Food Risk Analysis and Regulatory Policies, Université Laval, Canada

- A** **Agenda Item 2:** Matters arising from the Codex Alimentarius Commission and its subsidiary bodies
- B** **Agenda Item 3:** Information on activities of FAO and WHO and other international organizations relevant to the work of CCFICS
- C** **Agenda Item 4:** Draft Consolidated Codex Guidelines related to Equivalence (Comments at Step 3)
- D** **Agenda Item 5:** Draft Guidelines on the Prevention and Control of Food Fraud (Comments at Step 3)
- E** **Agenda Item 6:** 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 at Step 3)
- F** **Agenda Item 7:** Discussion paper on guidance on appeals mechanism in the context of rejection of imported food
- G** **Agenda Item 8:** Discussion paper on the standardization of sanitary requirements
- H** **Agenda Item 9.1:** Review and update of Appendix A - the list of emerging global issues
- I** **Agenda Item 9.2:** Proposals for New work related to the emerging global issues - Part 1 - Discussion paper on establishment listing
- J** **Agenda Item 9.21:** Proposals for New work related to the emerging global issues - Part 2: Discussion paper on the digitization of the National Food Control Systems



AGENDA ITEM 6:

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 AT STEP 3)

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BACKGROUND

- In 2006 Codex developed a text on Traceability : CXG60-2006: Codex “Principles for Traceability/ Product Tracing as a Tool Within a Food Inspection and Certification System” – with emphasis on tracing one step forward and one step backward.
- Codex guidance, was used by many countries to guide their own traceability requirements.
- Traceability is a key components to support mitigation of food (safety and fraud) incidents – enabling a faster identification of incriminated products and their removal from chain.
- Progress was witnessed in the way technology was being harnessed to improve and modernize traceability systems
- During CCFICS25 (2021), a discussion paper was introduced by the US and the UK to consider updating the existing Codex guidance : revisit fit for purpose and scope. An EWG was established to review the current guidance and make recommendations to CCFICS26. Information gathering from FBOs as to the technology platforms used to enhance traceability activities / practices
- During CCFICS26 (2023), a discussion paper on the review and updates of CXG60-2006 was introduced, along with a project document related to a scope of the new work: revision and update of this guidance. CAC46 (2023) approved the new work



BACKGROUND... Continued



- An EWG co led by the US, Australia, Ecuador, Honduras and the UK was created in 2023 and examined whether the current guidance :
 - ✓ Covered the entire chain,
 - ✓ Included the aspects of reliance on technology in the manner that current tools would allow to be harnessed
 - ✓ Included all the relevant responsibilities for FBOs,
 - ✓ Was incorporating the risk-based nature of the interventions
 - ✓ Had a good coverage of aspects related to communication in the context of managing traceability.
- The EWG concluded that :
 - ✓ The way the production chain covered :production, processing and distribution, was complete enough – a definition of food supply chain was however recommended to be developed
 - ✓ There was a need to broaden the notion of “interoperability” when it comes to exchange of information on traceability matters
 - ✓ No consensus was reached as to how risk would be factored in, in the document

BACKGROUND.... Continued



- A new draft was developed in June 2024 – with additional questions as to :
 - ✓ whether reference to standard setting bodies IPPC, WOAH and Codex should be explicitly mentioned, - Retained
 - ✓ How the reference to feed, primary production and packaging would be made – Divergent opinions
 - ✓ Whether a specific mention would be made to “Buyers” instead of FBOs – Not retained
 - ✓ Whether specific guidance on a traceability “system” should be included – No need after all
 - ✓ Whether to have better guidance on communication and cooperation. – new wording should be retained
- CCFICS27 will consider this document at Step 4 – (currently at step 3) – for the first time
- EWG is recommending to proceed to Step 5 after discussion

Overall Good improvement of the previous guidance



Emphasis on how traceability can aid in more effective prevention and mitigation of food incidents

The Principles are more complete :

- **Position traceability well as a tool to extract the relevant information about sourcing and movement of ingredients and food**
- **Re-iterating the minimum requirements of one step backward and one step forward**
- **Further information on interoperability between systems: supporting the exchange of information throughout the food supply chain**
- **Insistence on not making the systems developed not to be “trade-restrictive”**
- **Importance to follow an outcome-based approach : not imposing a system of traceability (accepting systems based on objectives and outcomes between importing and exporting countries.**

Section 15 of the legal requirements insists on the risk-based approach



Section 17 of the Good practice mentions the needs to adapt to the capabilities of developing countries and Section 19 – providing guidance on how “to assist” developing countries adapt to the requirements of importing countries

Important Sections on (Traceability) System Design :

Necessity of being Technology Neutral, Outcome based and as much as possible relying on “Standardized” data aspects and possible reliance on other technology facilitated systems adopted by FBOs such as e-Certification

Conclusion



The proposed text offers progress and a good update to the existing guidance – with a more practical considerations related to the adoption of “Traceability Systems” harnessing new technologies and accounting for the needs of developing countries.

There does not seem to be major divergence between members (based on the EWG report) – therefore upon discussion at CCFICS26, this text could move to adoption at Step 5.

