



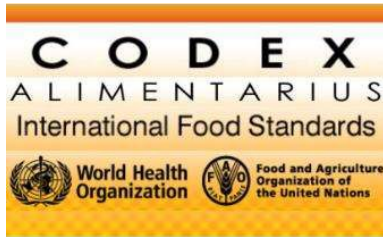
"Traceability of fishery products from a sanitary perspective"

Paolo Caricato Deputy Head of Unit

DG SANTE G4 Food hygiene

10 October 2019

Food Law requirements of traceability



The Codex Alimentarius Commission defines Traceability as “the ability to follow the movement of a food through specified stage(s) of production, processing and distribution”



ISO 8402:1994

"Traceability is the ability to trace the history, application or location of an entity by means of recorded information."



Regulation (EC) No 178/2002 (Art 3(15))

Traceability is the ability to track any food, feed, food-producing animal or substance that will be used for consumption through all stages of production, processing and distribution.



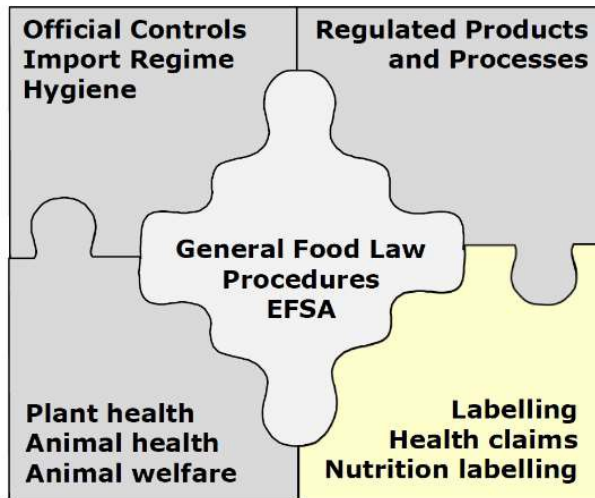
The EU obligations of food trade

Multilateral system (WTO)

- o SPS and TBT agreements
- o International Standards Setting Bodies (ISSBs): Codex Alimentarius, OIE (Animal Health), IPPC (Plant Protection)

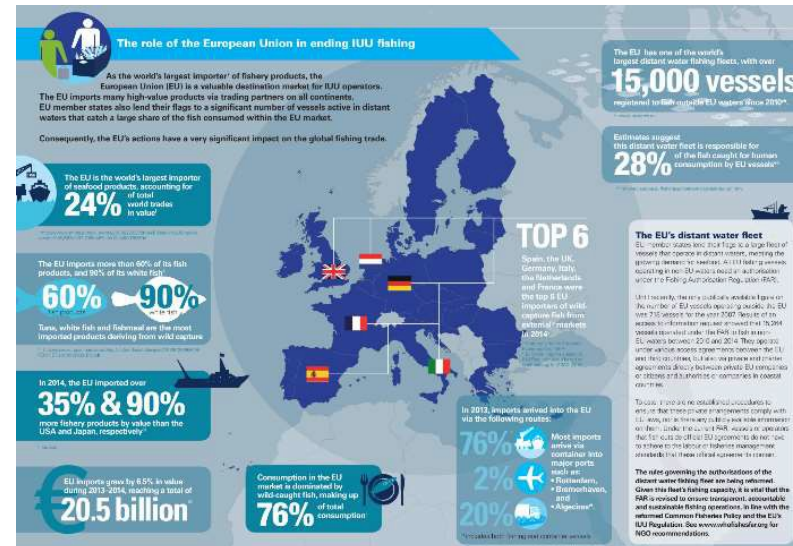
EU Legislations on food safety

- o General Food Law
- o EU food safety legislations
- o Official Control regulations



EU Legislations on IUU

Regulation to prevent, deter and eliminate IUU entered into force on 1 January 2010



Food Law requirements of traceability

Traceability:

- facilitates withdrawal of faulty food/feed from the market
- provides consumers with targeted and accurate information on specific products
- covers all food and feed, all food and feed business operators, without prejudice to existing legislation on specific sectors
- affects importers who are required to be able to identify from whom the product was exported in the country of origin
- obliges businesses to be able to identify at least the immediate supplier of the product in question and the immediate subsequent recipient, with the exemption of retailers to final consumers - one step back-one step forward (unless specific provisions for further traceability exist).

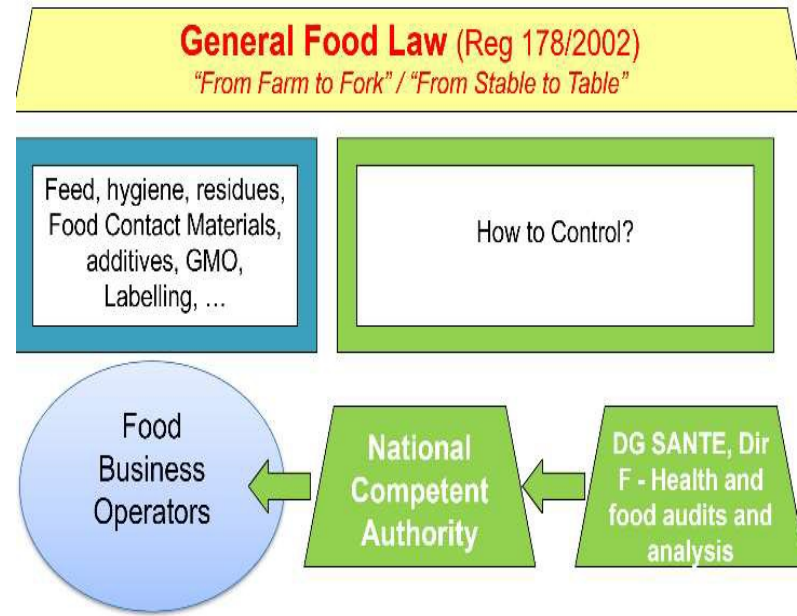


Food Law requirements of traceability

Operators' responsibilities

Primary responsibility for ensuring compliance with the food law and in particular the safety of the food or feed remains with the food/feed business operators.

To complement and support this principle the competent Authorities of the Member States must assure adequate and effective controls.



When food or feed is unsafe, business operators are obliged:

- to withdraw or recall it
- to notify the competent national authorities so as to be able to monitor whether the appropriate measures have been taken or require that additional measures be taken for reducing or eliminating a food safety risk.



Food Law requirements of traceability

One step backward – One step forward

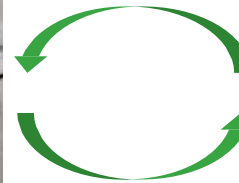
(1) Food and feed business operators shall be able to identify any person from whom they have been supplied with a food, a feed, a food-producing animal, or any substance intended or expected to be incorporated into a food or a feed. To this end, such operators shall have in place systems which allow for this information to be made available to the competent authorities on demand.

ONE STEP BACKWARD

(2) Food and feed business operators shall have in place systems and procedures to identify the other businesses to which their products have been supplied.

This information shall be made available to the competent authorities on demand.

ONE STEP FORWARD



Food Law requirements of traceability

Does this apply to exporters to the EU?

The EU traceability requirements only apply within the EU (no extra-territorial effect):

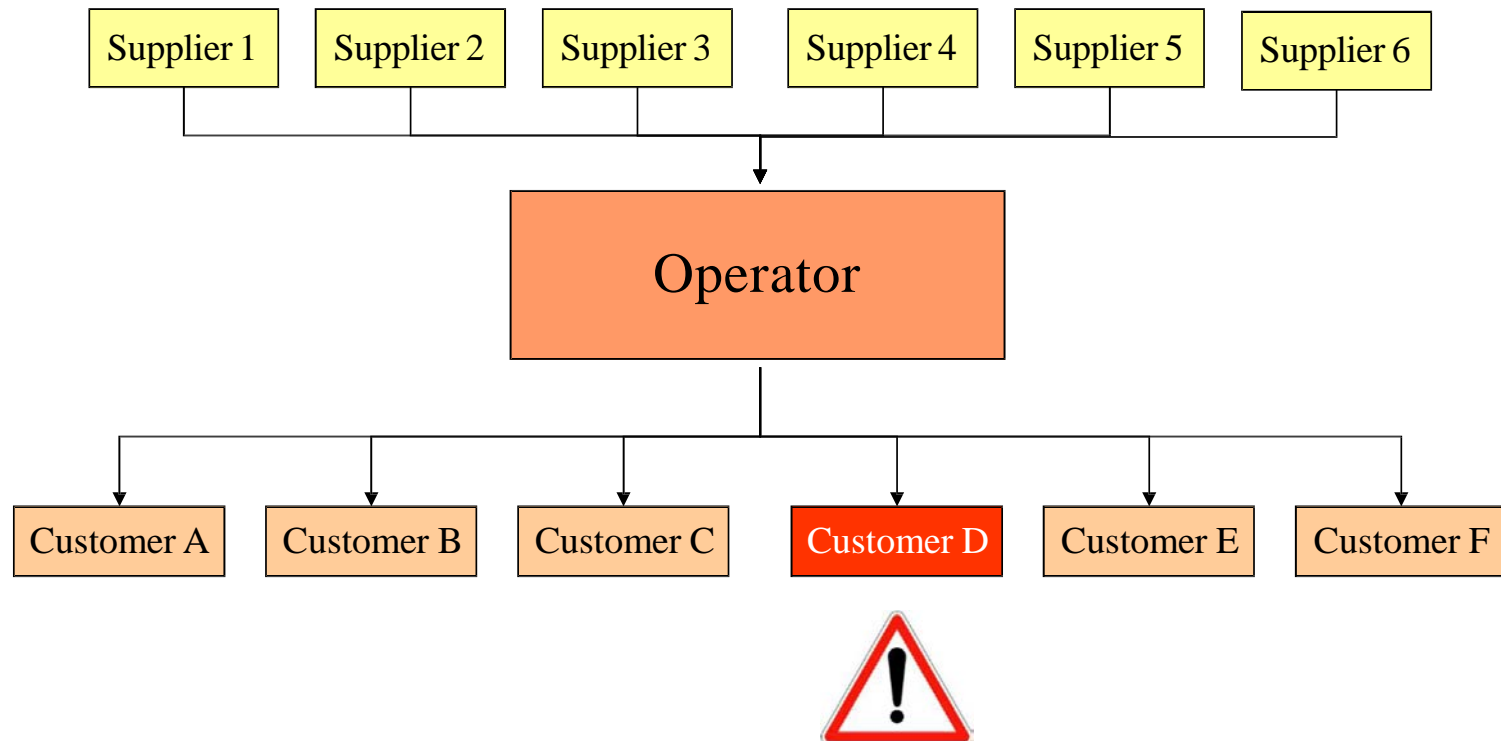
- They apply from the importer to the retailer (i.e. the importer must be able to identify his supplier in a third country (one step back).
- The exporter himself, in the non-EU country, is not bound by the traceability requirements

However, he may have traceability obligations, either under specific requirements (i.e. products of animal origin) or because of contractual arrangements.

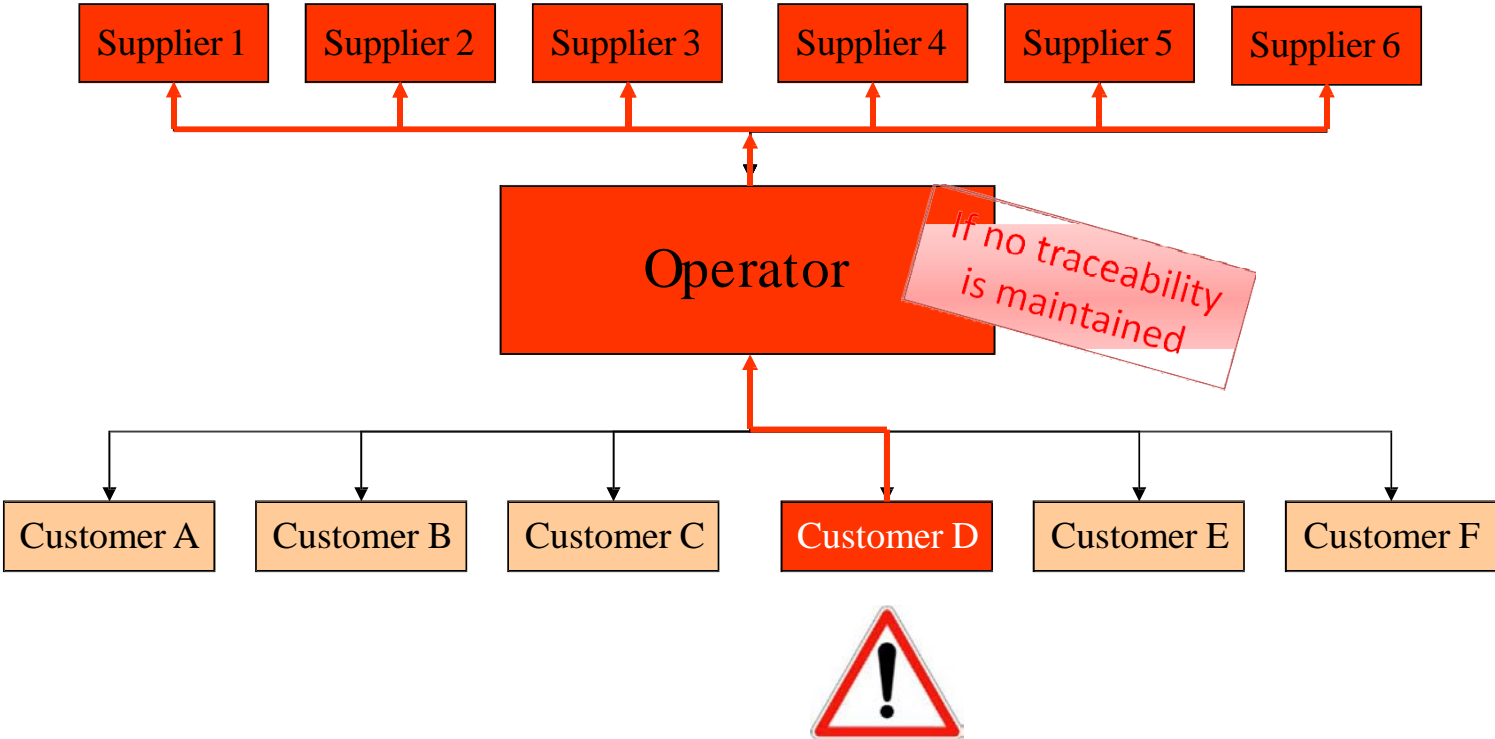


Is internal traceability required?

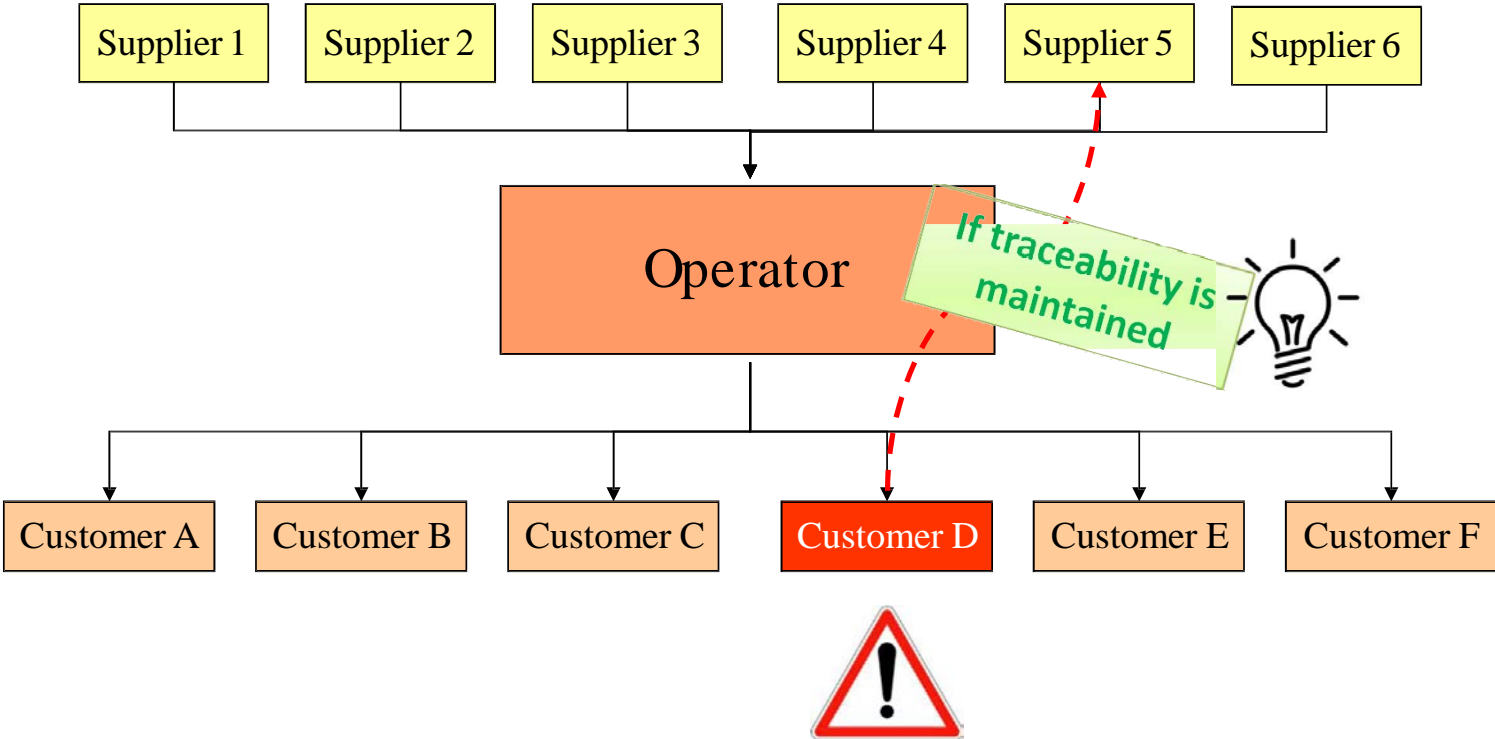
- ▶ There is no simple supply chain
- ▶ Is a business operator obliged to match **outputs** and inputs?



Is internal traceability required?

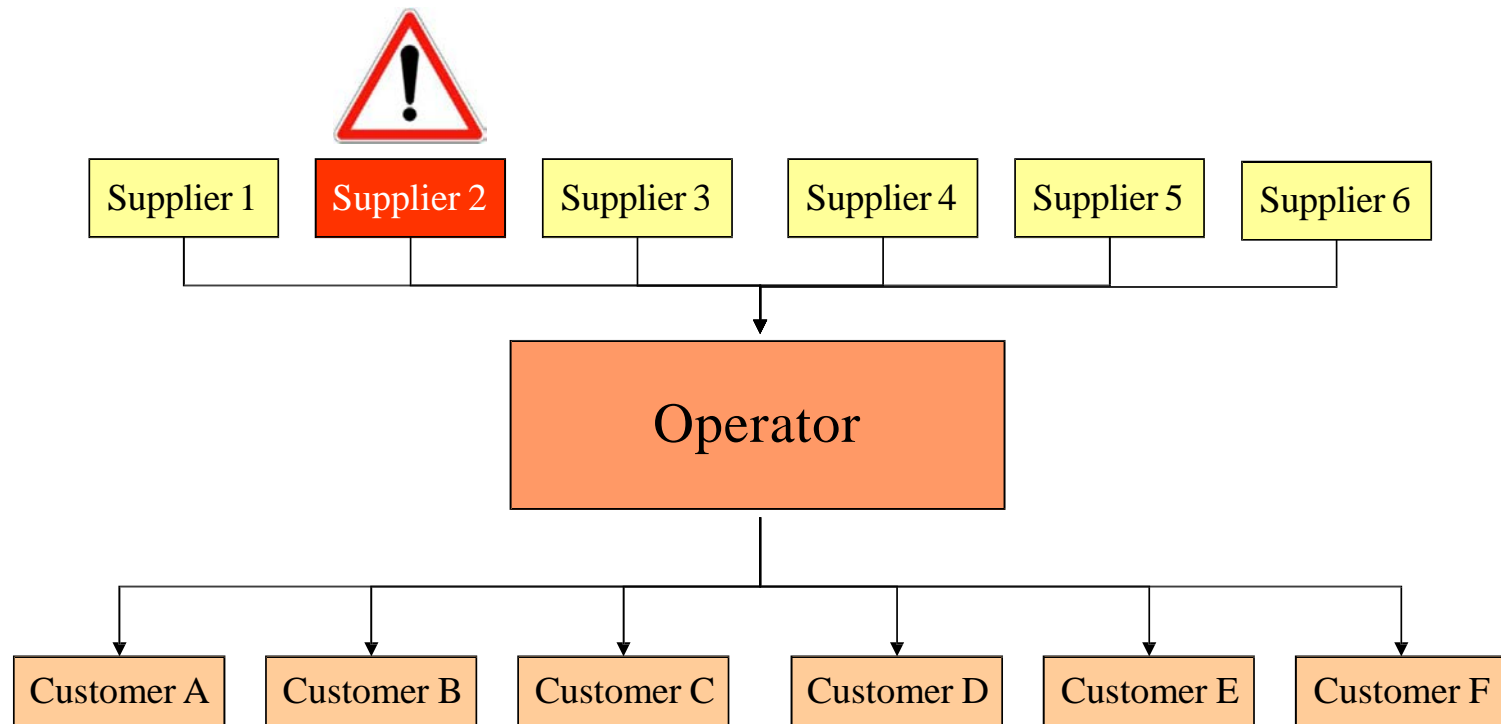


Is internal traceability required?

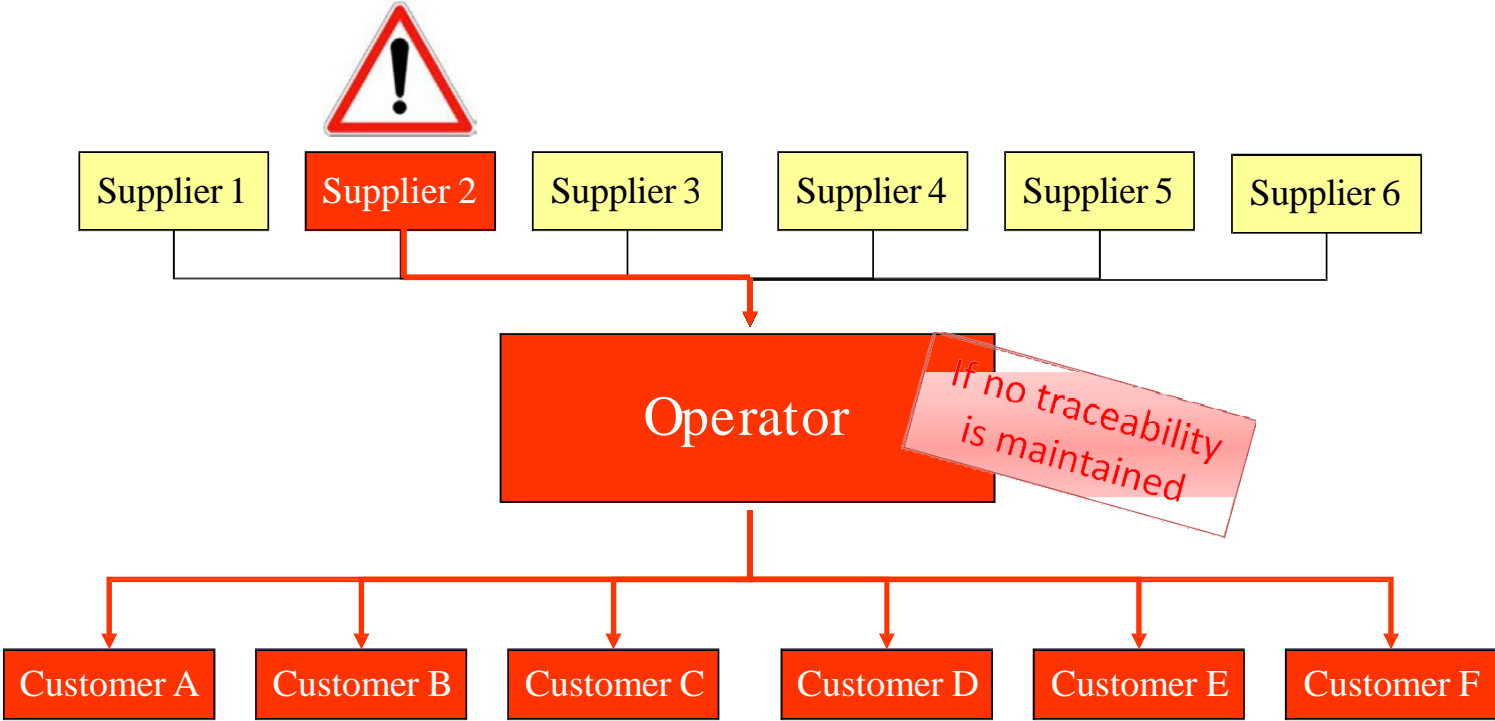


Is internal traceability required?

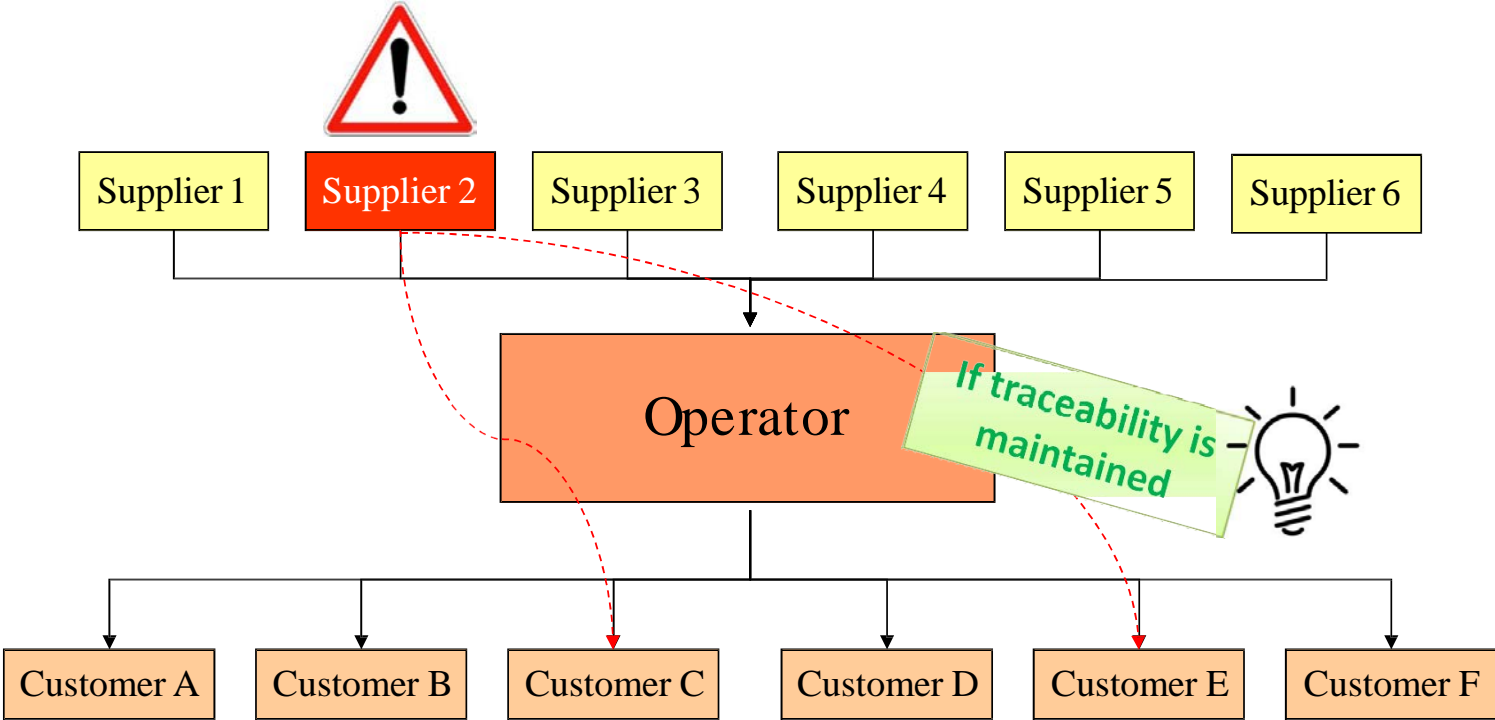
- Is a business operator obliged to match **inputs** and outputs?



Is internal traceability required?



Is internal traceability required?



Summary

	EU Regulation on food Safety
Principle	Safety of European consumers
Scope	European member States and European operators
Objective	To provide basis for the assurance of a high level of protection of human health and consumers in relation to food.
Unique identification	All food products, including fishery products, have to be identified by lot. The establishment authorized to supply the EU market must be approved.
Data capture and management	Required for the information to be made available to the competent authority on demand.
Data communication	Rules on labelling of food products and fishery products.