

## Traceability:

European Parliament and Council Regulation (EC) No 178/2002 – Article 18

- **Scope**

Following several highly publicised food scares in the EU, the need to identify the origin of foodstuffs is central to ensuring rapid withdrawal of food from the EU market. To facilitate this, any food which has been placed on the market, but is unfit for human consumption, or is likely to injure human health, must be quickly tracked and withdrawn.

Within the General Food Law legislation (Regulation 178/2002/EC), the general principles of traceability are outlined in Article 18. Included in this legislation are of traceability required on the EU market. To facilitate the implementation of traceability, the Commission subsequently produced non-legally binding guidelines, developed in collaboration with member states' experts. These are available [here](#).

- **General Requirements**

To aid withdrawal, the origin of all food and ingredients must be fully documented at all stages throughout the chain from production to distribution. This involves recording operators to whom products have been supplied and from whom they have been received- the so called “one step back – one step forward” approach. A system or procedures must be in place to ensure that this information can be provided to National authorities on request to trace and withdraw produce where necessary.

- **Traceability of imported produce**

Food entering the community from third countries must be traceable to the point of import, and traceability is not extended to third countries or their operators. The importer must be able to specify from whom the product was exported in the third country. Food entering the community must, however, adhere to the rules of the community as described in Article 11 of the General food Law. Additional requirements over-and-above those described above, are not legislative requirements but often customer-specific.

- **Internal traceability**

There is no legislative requirement to implement internal traceability, that is to say establish a link between incoming and outgoing produce within a food business operator. However, in order to meet traceability requirements, it is recommended that internal traceability is practiced.

- **What information should be kept?**

Two types of information must be kept based on its priority:

1. **Mandatory information required by authorities**

- name, address of supplier, nature of products which were supplied;
- name, address of customer, nature of products which were delivered to the customer; and
- date of transaction / delivery.

2. **Optional, but highly recommended, information to be kept**

- volume or quantity;
- batch number, if any;
- supplementary product detail, e.g. variety of produce.

- **Within what time should information be available?**

Once a system is in place to trace a product, the information must not be delayed in transmission which could exaggerate a crisis. Mandatory information under point 1 above should be available to the authorities immediately, whilst optional information under point 2 should be made available as soon as reasonably practical.

- **For how long should records be kept for?**

No period is stipulated in the legislation. The period the Commission suggest depends on the longevity of the product. As fresh produce is highly perishable, but does not often have a 'use by' date, the period recommended is 6 months after delivery of the produce.

- **What doesn't have to be covered?**

The legislation states that '*any substance intended to be, or expected to be incorporated into a food*', must be traceable. As such, there is no requirement under this legislation to trace plant protection products or fertilizers, but these traceability links will be obligatory under food hygiene legislation ([Regulation 852/2004/EC](#)). Similarly, packaging materials do not fall under the scope of this legislation but the subject of separate legislation (see below).

- **Traceability of materials in contact with foodstuffs**

In November 2004, new rules came into force regarding packaging materials which are permitted to come into contact with foodstuffs. The rules ([Regulation 1935/2004/EC](#)) specifically stipulate that food packaging must be traceable. This provision enters into force 27 October 2006 and will require any operator packing fresh products to record the source of his packaging materials, thus facilitating a recall of contaminated or harmful packaging.

- **Traceability guidelines for the fresh produce industry**

### 1. Fresh Produce Traceability Guidelines (FPT guidelines)

These guidelines were developed in 2001 to provide a common approach to tracking and tracing fresh produce by means of an internationally accepted numbering and bar coding system. The FPT guidelines were developed by collaboration among the EuroHandels Institute (EHI), European Association of Fresh Produce Importers (CIMO), Euro Retailer Produce Working Group (EUREP), European Union of the Fruit and Vegetable Wholesale, Import and Export Trade (EUCOFEL) and Southern Hemisphere Association of Fresh Fruit Exporters (SHAFFE). They define the minimum requirements for the traceability of fresh produce with the custom code nomenclature starting with the digits 07 and 08.

The required recommendations and guidance needed to understand and implement the EAN•UCC system of numbering and bar coding of trade units (e.g. cartons, boxes or bins) and logistics units (e.g. pallets) are provided. However, the guidelines do not address the numbering and bar coding of consumer units (e.g. loose or pre-packed produce).

Click [here](#) to view the full FPT guidelines

### 2. Banana supply chain traceability guidelines

Following the implementation of the above guidelines, certain areas specific to banana trading were identified which required the modification of the FPT guidelines into a specific standard with global applicability. Using the EAN•UCC System of numbering and bar coding, this new model ensures traceability from the banana packing station to the retailer.

A copy of the banana traceability guidelines can be downloaded [here](#)

## **FRESH QUALITY GUIDE**

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