

ASEAN Guideline on Traceability for Food and Feed



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FOREWORD

The ASEAN General Guideline on Traceability of Food and Feed provides the ASEAN Member States with an important tool in enhancing food safety among ASEAN Member States. The formulation of the guideline is led by the ASEAN Rapid Alert System for Food and Feed (ARASFF) Steering Committee (ARASFF-SC), a committee established by the ASEAN Ministers on Agriculture and Forestry (AMAF) to oversee the establishment and operations of the rapid alert system for food and feed in ASEAN.

It is worthwhile to note that in developing this document, ARASFF has coordinated and conducted consultation with respective ASEAN committees in the health and economic sectors i.e the ASEAN Health Cluster 4 on Ensuring Food Safety (AHC 4) under the Senior Officials Meeting on Health Development (SOMHD) and the ASEAN Consultative Committee for Standards and Quality (ACCSQ) - Prepared Foodstuffs Product Working Group (ACCSQ-PFPWG) under the Senior Economics Officials Meeting (SEOM). This indicates the wide application of this Guideline in following up food safety alerts, handling food safety emergencies and enforcing food safety controls.

The document is expected to serve as a reference to all ASEAN Member States to enhance food safety across the region and support the harmonisation of regulatory requirements. The document guides the establishment and operation of traceability systems within ASEAN Member States that are consistent with the ASEAN Food Safety Policy and mirrors internationally agreed concepts on traceability requirements for food safety.

am confident that this Guideline will integrate and underpin the ongoing complementary initiatives that ASEAN is undertaking in improving food safety across the region.

| congratulate ARASFF-SC, AHC-4 and PFPWG and the respective Ministerial bodies in this achievement and look forward to successful implementation of the guideline by the ASEAN Member States and ASEAN Sectoral Bodies.

Dr. Kasdi Subagyono

Muil.

SOM-AMAF Chairman



1. Introduction

It is intended that this Guideline serves to establish the requirements for traceability for food and feed in ASEAN and provides the basis for harmonised regulatory requirements and facilitate intra-ASEAN trade in food products. The establishment of traceability systems across ASEAN Member States will additionally enable the effective deployment of the ASEAN Rapid Alert System for Food and Feed.

Traceability is required for the purpose of protecting consumers against food safety hazards including hazards derived from feed and deceptive marketing practices.

Traceability systems enable food and feed businesses operators to demonstrate to their buyers as well as to the food and feed safety authorities that all materials and at relevant stages of production, processing and distribution of food and feed products have been applied are in compliance with the ASEAN Food Safety Policy, Principle 8 Reliable Traceability System.

If a product with a hazard and causing health risk to the consumers is found on the market, such systems are essential in enabling a product recall to avoid any harm to consumers.

Competent authorities in Member States should ensure that national legislation is compatible with these guidelines and enables the requirements to be implemented by all food and feed businesses operators.

2. Scope

The Guideline is applicable to all the food and feed products and is applicable to the entire food and feed chain when and as appropriate, in order to enable the withdrawal of unsafe food, contribute to the protection of consumers against food safety hazards and deceptive marketing practices and the facilitation of trade on the basis of accurate product description.

The generic requirements for traceability as contained in this Guideline may be supplemented by sector specific guides such as those for aguaculture and for animal identification listed in Annex I.

3. Definitions

- **Food Business Operator** means a natural or juridical person responsible for operating business in any step in the food chain.
- **Feed Business Operator** means a natural or juridical person responsible for operating business in any step in the feed chain.
- **Food** means any substance, whether processed, semi-processed or raw, which is intended for human consumption, and includes drinks, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances used only as drugs.
- Feed means any single or multiple materials, whether processed, semi-processed or raw, which are intended to be fed directly to food producing animals.
- **Food and feed chain** means the sequence of the stages and operations involved in the production, processing, distribution and handling of feed and food, from primary production to consumption.

NOTE Primary production includes the production of feed for food-producing animals and for animals intended for food production.

- **Traceability** means the ability to follow the movement of a food /feed product through specified stage(s) of production, processing and distribution.
- **Traceability system means** totality of data and operations that are capable of maintaining desired information about a product and its components through all or part of its production and utilization chain.
- **Lot** means a definitive quantity of some commodity manufactured or produced essentially under the same conditions.

4. Principles

- Member States' legislation for food and feed safety should have provisions for food and feed business operators to have traceability systems in place at any relevant stages that meet the requirements of this guideline. The provisions should include authority to inspect traceability systems and records.
- Competent authorities in Member States may require traceability to all or specified stages of the food chain (from production to distribution), as appropriate to the objectives of the food inspection and certification system in place.
- The traceability system should be able to identify at any specified stage of the food and feed chain (from production to distribution) from where the food and feed came (one step back) and to where the food / feed went (one step forward), as appropriate to the objectives of the food and feed inspection and certification system. Nevertheless, food and feed business operators do not have to identify the immediate customers when they are final consumers.
- The objectives scope and related procedures of a national food and feed inspection and certification system that includes traceability requirements should be transparent and made available to competent authorities of the other Member States upon request.
- In deciding whether and how to apply the traceability in the context of a food/feed inspection and certification system the competent authority should take account of the assessed food safety risks and/or the characteristics of the potential deceptive marketing practices being addressed.
- Where any food / feed which is found to be unsafe is part of a lot of food of the same class or description, it shall be presumed that all the food/ feed in that lot is also unsafe, unless following a detailed assessment there is no evidence that the rest of the lot is unsafe.
- Consistent with ASEAN Food Safety Policy Principle 4 Primary Responsibility of Food Business Operator, a food business operator should have primary legal responsibility for ensuring food safety. In the same sense, the responsibility for applying traceability should exclusively lie with the food/feed business operator.
- Member States should ensure that an appropriate coordination among the competent authorities responsible for trade, health, and agriculture at national and at ASEAN level is established for implementation of traceability.

5. Traceability Requirements

- The traceability requirements in this part apply for all food and feed products at any relevant stage of the food and feed chain. The generic requirements in this guideline may be supplemented by specific sector requirements. A list of sector specific guides that has been published to date, can be found in Annex I. This list may be supplemented with additional sector specific guides when deemed necessary.
- The documents listed in Annex II to the Guideline provide supplementary guidance and information to aid implementation and identify references that describe the range of tools available for complying with the requirements for traceability as elaborated in the Guideline.

Identification of food and feed business operators by the Competent Authority

When traceability is required by the regulatory authority for a food or feed product, the food or feed business operators should be required to register, be authorized or secure the necessary permit as appropriate. The Competent Authority should assign the food and feed business operator with a unique identification code that is used for the purposes of traceability.

The competent authority should maintain the following information:

- a. the name of the food/feed business operator and contact information;
- b. the business identification and registration details; and
- the name and contact details of the person responsible for traceability, including out of office contact information for contact in case of emergency.
- The Competent Authority should require that the food /feed business operator keeps records that identify any party that has supplied the food /feed business operator, or to whom the food /feed business supplies, a food /feed or any substance intended to be incorporated into a food/feed This should include:
 - a. the address and all other contact details of all locations of the business;
 - b. shelf-life or expiration date of the products;
 - c. conservation and storage methods for the product;
 - d. country of origin, in the case of imported food/feed;
 - e. manufacturer or exporter company in the case of imported food/feed;
 - f. the food/feed business operator's food/feed traceability management plan.

This information shall be submitted to the Competent Authority upon request.

Product Identification, labelling and record keeping

Competent authorities in Member States should require that when traceability is required, the food and feed business operator's traceability management plan:

- a. determines the "traceable item" and defines this. This may be a packaged product or traded item (e.g. case/carton, consumer item); a logistic unit (e.g. bin, container) or a shipment or movement of a product or trade item; or a lot.
- defines the link between the physical flow of products with the flow of information about those products;
- defines labelling requirements such that the information is adequate for ensuring traceability;
- d. food and feed products should bear information about the name and full address of the responsible food/feed business operator.
- in the case of an imported foodstuff/feedstuff, the name and full address of the importer should accompany the product.
- f. defines a record keeping system that ensures data on all incoming and outgoing transactions is maintained. The records should include dates of all transactions, sources of all incoming products, destinations of all outgoing products, information of parties responsible for the transportation, product identification details, and quantities.
- g. defines the retention period for record keeping should be such that it exceeds the shelf life of the product by a period defined by each of Member State.

Annex I Sector Specific Traceability Guidelines

- a. Regional Guidelines on Traceability Systems for Aquaculture products in the ASEAN Region (developed by the ASEAN Working Group on Fisheries), and;
- b. ASEAN Animal Identification and Traceability System (AAITS) Adopted at the 39th AMAF Meeting on 28/9/2017

Annex II Traceability references and standards

- a. Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System CAC/GL 60-2006
- ISO 22005:2007, Traceability in feed and food chain –General principles and basic requirements for system design and implementation.
- c. Food Traceability Guidance (FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS, SANTIAGO, 2017)
- d. GSI Global Traceability Standard –Business Process and System Requirements for Full Chain Traceability (GSI GTS).



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