Traceability in the Food Chain - One Step Forward, One Step Back

February 26, 2013

The on-going controversy regarding the presence of horsemeat in products labelled as beef has again brought the issue of traceability in the food chain into sharp focus.

In the 1990s, the need for traceability in the food chain became apparent following a number of food crises in Europe, most notably the BSE crisis. Traceability was subsequently adopted as a core principle of EU food law in Regulation (EC) 178/2002 (the “Regulation”).

The Regulation establishes that all food business operators must comply with the “one step forward, one step back” approach i.e. they must be able to identify the businesses to which their products have been supplied and to trace food chain inputs back to the immediate supplier of that food input.

One notable exception is that customer traceability is not required for operators who sell solely to the final consumer.

The Regulation provides that food which is likely to be placed on the market must be labelled to facilitate its traceability and the traceability of food must be established at all stages of production, processing and distribution.

In general food law does not prescribe the traceability information to be maintained by food business operators. However, there is a variety of sector-specific legislation which outlines minimum requirements for different food industries. The Food Safety Authority of Ireland (the “FSAI”) has also issued detailed guidance outlining the traceability information which it recommends that operators should maintain. Food business operators must have systems in place which enable them to make traceability information available to the FSAI on demand.

As recent events have demonstrated, delays in identifying the source of food products can lead to extended adverse media coverage for a food business operator and the wider food industry. In a new development, the Minister for Agriculture has indicated that DNA testing of meat will become a routine part of food testing nationwide and that a national protocol for DNA testing of meat would be applied at retail, catering and processing level. It is clear that the issue of traceability will remain a high priority for some time to come.

Contributed by Michele Mulvey

Share 0  Tweet 0 0

Back to Publications