

Chapter 16 Food Traceability (Identification and Health Marking)

16. Introduction

16.1. General food law guidance

16.2. Health mark and identification mark charts

16.3. Compulsory beef labelling requirements

16.4. Legal requirements for food traceability

A. Supplier and customer records

B. Identification marking

C. Health marking

16. Introduction

Information about suppliers and customers means that if a significant food safety concern occurs, the food can be tracked backwards or forwards through the food chain. This information can be used to withdraw or recall food more quickly from the market and to target these actions to specific products. This may be due to concerns over microbiological contamination (for example, E.coli O157), chemical contamination (for example, veterinary medicines, dioxins) or physical contamination (for example, glass) of the product, if unfit meat has been released on to the market, or released prior to the results of statutory testing (BSE, Trichinella), or even adulteration concerns.

The application of a health mark or identification mark to products of animal origin, including meat, is an important part of the traceability system.

- The health mark indicates that red meat carcasses (including farmed and wild game animals) and wholesale (primal) cuts have been subject to ante and post-mortem inspection and have not been found unfit for human consumption at the time of inspection.
- The identification mark, applied by the food business operator, indicates that white meat, all cut meat, and processed meat has been produced in accordance with the legal requirements.

16.1. General food law guidance

FSA and European Commission guidance on the EU General Food Law Regulation 178/2002 may be found on the FSA website at:

www.food.gov.uk/foodindustry/guidancenotes/foodguid/generalfoodlaw

16.2. Health mark and identification mark charts

Products of animal origin produced in approved premises are to be marked by either a health mark or an identification mark. Health marks are applied by, or under the supervision of, official veterinarians, while it is food business operators that apply identification marks.

16.3. Compulsory beef labelling requirements

The Compulsory Beef Labelling Scheme is administered and enforced by the Rural Payments Agency in England and Wales, and by the Scottish Government in Scotland, and DAERA in Northern Ireland.

It is based on the following legislation:

- The Beef and Veal Labelling (England) Regulations 2010 (SI 2010/983)
- The Beef and Veal Labelling (Wales) Regulations 2011 (SI 2011/991 (W. 145))
- The Beef and Veal Labelling (Scotland) Regulations 2010 (SSI 2010/402)
- The Beef and Veal Labelling (Northern Ireland) Regulations 2010 (SR 2010/155)
- Regulation (EC) No 1760/2000
- Regulation (EC) No 1825/2000, as amended by Commission Regulation (EC) 275/2007
- Regulation (EU) No 1308/2013
- Commission Regulation (EC) No 566/2008, as amended by Commission Implementing Regulation (EU) No 565/2013
- The key elements are:
 - a reference number or code
 - the name of the member state or non-EU country in which the animal or group of animals were born
 - the name of the member state or non-EU country in which the animal or group of animals were raised
 - the words 'Slaughtered in: [name of member state or non-EU country]'
 - the licence number of the slaughterhouse – this doesn't apply to beef sold loose over the counter
 - the words 'Cutting / cut in: [name of member state or non-EU country]'
 - licence number(s) of the cutting plant(s) – this doesn't apply to beef sold loose over the counter

Further information can be found at:

- www.gov.uk/comply-with-the-compulsory-beef-labelling-scheme
- www.scotland.gov.uk/Topics/farmingrural/Agriculture/Livestock/Meat/Beef/Labelling/scheme
- www.daera-ni.gov.uk/articles/beef-labelling

16.4. Legal requirements for food traceability

The following sections set out the traceability record keeping and marking requirements of the regulations that apply to slaughter, dressing and further processing of meat.

A. Supplier and customer records



Legal requirement

853/2004 Annex II Identification Marking: Section I point A4

A1. Food business operators (FBOs) must, in accordance with Article 18 of Regulation 178/2002, have in place systems and procedures to identify FBOs from whom they have received and to whom they have delivered products of animal origin.

General Food Law Regulation 178/2002 Article 18

A2. Food 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 to be, or expected to be, incorporated into a food ... To this end, such operators shall have in place systems and procedures which allow for this information to be made available to the competent authorities on demand.

A3. Food ... 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.

A4. Food ... which is placed on the market or is likely to be placed on the market in the Community shall be adequately labelled or identified to facilitate its traceability, through relevant documentation or information in accordance with ... more specific provisions.

A1. to A4. Compliance regarding traceability of suppliers and customers

- Have arrangements in place to identify suppliers and customers.

A1. to A4. Good practice

The requirement applies a 'one step back, one step forward' approach. Keep information on paper or in electronic form about the products received from each supplier and the product supplied to each customer. As a minimum, records should include the supplier or customer names and

addresses, product description and date of receipt / delivery.

Food producing animals are subject to traceability requirements. Traceability records must be made available quickly enough for them to be useful in any withdrawal or recall of unsafe food.

Internal traceability is not a legal requirement, but it may be possible to have production records that link incoming animals / meat to outgoing product to limit the quantities that may be involved.

Importers of food and food brokers need to keep a record of products and suppliers from EU and 3rd countries.

Final consumers – customers who are final consumers do not have to be identified. A final consumer is the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity.

Traceability of meat – the meat chain traceability system includes the requirements for animal identification information (for example, movement documents, ear tags), supply of food chain information, supplier declarations, veterinary certificates and correlation of carcasses and offal, health and identification marking of products. See below and chapter 11 on 'Acceptance and slaughter of animals'.

Beef labelling – beef offered for sale must be fully traceable and compulsory country of origin indications must be shown. The rules apply to all fresh and frozen beef and veal offered for sale at all stages in the supply chain from slaughterhouse to final sale to end consumer.

For further information on beef labelling, see the 'Useful contacts' section in chapter 1 'Introduction', or:

- **England and Wales** – see the 'Approved Beef Labelling Scheme' at: www.rpa.defra.gov.uk
- **Scotland** – visit: www.scotland.gov.uk/Topics/farmingrural/Agriculture/Livestock/Meat/Beef/Labelling
- **Northern Ireland** – visit: www.daera-ni.gov.uk/articles/beef-labelling

Food packaging – traceability of certain food packaging is covered by EC Regulation 1935/2004.



Legal requirement

Commission Implementing Regulation (EU) 931/2011 Article 3 (1)

A5. Food business operators shall ensure that the following information concerning consignments of food of animal origin is made available to the food business operator to whom the food is supplied and, upon request, to the competent authority:

- (a) an accurate description of the food;
- (b) the volume or quantity of the food;
- (c) the name and address of the food business operator from which the food has been dispatched;
- (d) the name and address of the consignor (owner) if different from the food business operator from which the food has been dispatched;
- (e) the name and address of the food business operator to whom the food is dispatched;
- (f) the name and address of the consignee (owner), if different from the food business operator to whom the food is dispatched;
- (g) a reference identifying the lot, batch or consignment, as appropriate; and
- (h) the date of dispatch.

Commission Implementing Regulation (EU) 931/2011 Article 3 (3)

A6. The information referred to ... shall be updated on a daily basis and kept at least available until it can be reasonably assumed that the food has been consumed.

When requested by the competent authority, the food business operator shall provide the information without undue delay. The appropriate form in which the information must be made available is up to the choice of the supplier of the food, as long as the information requested ... is clearly and unequivocally available to and retrievable by the business operator to whom the food is supplied

A5. and A6. Compliance regarding format of traceability

- Food business operators shall ensure that the information concerning consignments of food of animal origin (A5. a – h) is made available to the food business operator to whom the food is supplied and, upon request, to the competent authority.
- The information referred to ... shall be updated on a daily basis and kept at least available until it can be reasonably assumed that the food has been consumed.

A5. and A6. Good practice

Information concerning consignments of food of animal origin, details the information to be referred to in commercial documentation, or labels, or displayed at point of sale including description, quantity, dispatch, consignor, destination and consignee details, as well as a batch or lot number, which could be in any format the FBO chooses, for example, 1,2,3 or even by date and number, for example, 14/11/2014 0001.

This permits flexibility in the format of the information (hard copy or electronic, such as databases, spreadsheets).

Information needs only to be retained “until it can be reasonably assumed that the food has been consumed” which will clearly be different depending on the destination, whether it is frozen, and its intended use.

B. Identification marking

L

Legal requirement

853/2004 Article 5: points 1 and 2

B1. Food Business Operators (FBOs) shall not place on the market a Product of Animal Origin (POAO) handled in an establishment subject to approval ... unless it has either (a) a health mark applied in accordance with Regulation (EC) No 854/2004... or (b) when that regulation does not provide for the application of a health mark, an identification mark applied in accordance with Annex II Section I of 853/2004.

B2. FBOs may apply an identification mark to a POAO only if the product has been manufactured in accordance with 853/2004 in establishments meeting the requirements of Article 4 (Approval and registration).

853/2004 Annex II Section IA: point 1 amended by 1020/2008 Annex I

B3. When required ... FBOs must ensure that POAO have an identification mark applied in compliance with the following provision: the identification mark must be applied before the product leaves the establishment of production.

853/2004 Annex II Section IA: point 4

B4. If an establishment manufactures both food to which this Regulation applies and food to which it does not, the ... operator may apply the same identification mark to both types of food.

853/2004 Annex II Section IA: point 2 amended by 1662/2006 Annex I

B5. However, when a product's packaging and/or wrapping is removed or it is further processed in another establishment, a new mark must be applied to the product. In such cases the new mark must indicate the approval number of the establishment where these operations take place.

B1. to B5. Compliance regarding identification marking of relevant products

- Apply identification markings to POAO that are to be placed on the market (unless they are health marked) before the product leaves approved premises and the product has been manufactured in accordance with 853/2004.
- Apply an identification mark to a product of animal origin only in establishments meeting the requirements of Article 4 (Approval and registration).
- If an establishment manufactures both food to which Regulation 853/2004 applies and food to which it does not, the same identification mark can be applied to both types of food.

B1. to B5. Good practice

Products of animal origin require identification marks except carcasses or wholesale cuts of red meat species, farmed game mammals (other than lagomorphs) and large wild game. These are health marked. See '16.2. Health mark and identification mark charts'.

Uneviscerated poultry carcasses moving between the farm and approved premises may be unmarked but have to be accompanied by a declaration and veterinary certificate in accordance with 853/2004 Annex III Section II Chapter VI points 6 and 7. See chapter 11 on 'Acceptance and slaughter of animals' 'B'.

The option exists for products that are not required to be identification marked (for example, foods such as pizzas with salami made from products of plant origin combined with processed products of animal origin), to be marked if they are made in the same establishment as products of animal origin (for example, salami) that have to be identification marked.

In exceptional circumstances an FBO is permitted to apply the ID mark of another establishment temporarily.

B5. Compliance regarding new identification marks

- Apply a new identification mark if a product has its packaging and / or wrapping removed or it is further processed in another establishment.

B5. Good practice

Apply the identification mark of the establishment where meat is unwrapped, re-wrapped, re-packaged or re-processed in some way in place of the original mark. A new mark need not be applied if its wrapping / packaging is not opened.

Even if a package is opened for checking by the operator or by an official a new mark should be applied. A note should be kept of which packages were opened and newly marked as well as the results of the checks.

The identification mark of the originating establishment should not be reapplied in a different establishment.



Legal requirement

853/2004 Annex II Section IB: points 5 – 8 amended by (EC) 517/2013 of 13 May 2013

B6. The mark must be legible and indelible, and the characters easily decipherable. It must be clearly displayed for the competent authorities.

B7. The mark must indicate the name of the country in which the establishment is located, which may be written out in full or shown as a two-letter code in accordance with the relevant ISO standard. In the case of Member States however these codes are BE, BG, CZ, DK, DE, EE, GR, ES, FR, HR, IE, IT, CY, LV, LT, LU, HU, MT, NL, AT, PL, PT, SI, SK, FI, RO, SE and UK.

B8. The mark must indicate the approval number of the establishment. If an establishment manufactures both food to which this regulation applies and food to which it does not, the ... operator may apply the same identification mark to both types of food.

B9. When applied in an establishment located within the community, the mark must be oval in shape and include the abbreviation CE, EC, EF, EG, EK, EY, ES, EÜ, EK, EO, EB, EZ or WE. These abbreviations must not be included in marks applied on products imported into the community from establishments located outside the community.

B6. to B9. Compliance regarding shape and contents of identification marks

Make sure that:

- the mark is clearly displayed for the competent authorities
- the identification mark is legible and indelible, and the characters are easily decipherable
- the mark is oval and contains:
 - the name or code of the Member State in which the establishment of production is located
 - the approval or registration number
 - the abbreviation 'EC'

B6. to B9. Good practice

The identification mark is to be oval.

There is no size requirement for identification marks but they must be readable.

Failure of automatic labelling equipment may lead to damaged labels and unclear identification marks. The identification mark may be illegible if the writing is too small or the surface it is used on is crumpled or wet.

The country name may be written out in full in capitals or shown as a two-letter code. For the United Kingdom, the code letters are 'UK' plus the Community mark is 'EC'.



Legal requirement

853/2004 Annex II Section IC: points 9, 14, and 13

B10. The mark may, depending on the presentation of different POAO, be applied directly to the product, the wrapping or the packaging, or be printed on a label affixed to the product, the wrapping or the packaging. The mark may also be an irremovable tag made of a resistant material.

B11. When the mark is applied directly to POAO, the colours used must be authorised in accordance with Community rules on the use of colouring substances in foodstuffs.

B12. When POAO are placed in a package destined for direct supply to the final consumer, it is sufficient to apply the mark to the exterior of that package only.

B10. to B12. Compliance regarding applying identification marks

- Depending on the product, display the identification mark either:
 - stamped directly on the product (using authorised colours), the wrapping or the packaging or
 - printed on a label fixed to the product, the wrapping or the packaging or
 - on an irremovable tag made of resistant material
- The mark need only be applied to the exterior of packages of POAO destined for direct supply to the final consumer.

B10. to B12. Good practice

It will be assumed that meat bearing your identification mark will have come from your premises, thus keep identification marks and labels secure. Control where they are used and by whom to minimise the risk of misuse.

Application of Id marks directly to meat – recommended food grade colours are (a) E155 Brown HT, (b) E133 Brilliant Blue FCF (c) E129 Allura Red AC or (d) an appropriate mixture of (b) and (c). See The Food Additives (England) Regulations 2009, The Food Additives Regulations (Northern Ireland) 2009 (SR 2009 No.416), The Food Additives (Scotland) Regulations 2009 and The Food Additives (Wales) Regulations 2009.

Tags – use of tags may create a physical hazard, particularly where meat is to be used in further processing.

Direct supply to final consumers – a final consumer is the ultimate consumer of foodstuff who will not use the food as part of any business or activity.

L

Legal requirement

853/2004 Annex II Section IC: points 10 and 11

B13. In the case of packaging containing cut meat or offal, the mark must be applied to a label fixed to the packaging, or printed on the packaging, in such a way that it is destroyed when the packaging is opened. This is not necessary, however, if the process of opening destroys the packaging. When wrapping provides the same protection as packaging, the label may be affixed to the wrapping.

B14. For POAO that are placed in transport containers or large packages and are intended for further handling, processing, wrapping or packaging in another establishment, the mark may be applied to the external surface of the container or packaging.

B13. and B14. Compliance regarding wrapped / packaged cut meat and offal

- In the case of packaging containing cut meat or offal, apply the id. mark to a label fixed to the packaging, or printed on the packaging, in such a way that it is destroyed when the packaging is opened, unless the process of opening destroys the packaging.
- When wrapping provides the same protection as packaging, the label may be fixed to the wrapping.
- The mark can be applied to the external surface of the container or packaging of POAO placed in transport containers or large packages and intended for further handling, processing, wrapping or packaging in another establishment.

B13. and B14. Good practice

Maintain the traceability and integrity of the meat by making sure that the identification mark effectively seals the package so that any tampering will be evident.

Place identification marks so they will be destroyed, for example, fix the label on the join of a box lid that is cut when the box is opened, or so that when wrapping (for example, plastic bag) bearing the identification mark is opened, it cannot be re-used.

If the meat is being sent to another establishment for cutting, processing, wrapping or packaging (or for intermediate storage before such work is carried out) the mark may be applied to the sealed containers or large packages. An approved establishment carrying out these activities is to apply its own identification mark to the product.

L

Legal requirement

852/2004 Annex II Chapter XII: point 1

B15. Food business operators are to ensure that food handlers are supervised and instructed and/or trained in food hygiene matters commensurate with their work activity.

B15. Compliance regarding training, instruction and supervision

- Make sure that food handlers are supervised and instructed and / or trained in food hygiene matters commensurate with their work activity.

B15. Good practice

Instruct staff about the need to apply identification marks correctly and report problems promptly. Supervise as appropriate and issue reminders if lapses occur.

Keep accurate, dated records to show what instruction / training individuals have received.

See chapter 7 on 'Training'.

C. Health marking

L

Legal requirement

853/2004 Article 5: point 1

C1. Food business operators shall not place on the market a product of animal origin handled in an establishment subject to approval ... unless it has either (a) a health mark applied in accordance with Regulation 854/2004... or (b) when that regulation does not provide for the application of a health mark, an identification mark ...

Trichinella: 216/2014

C2. Official Controls for Trichinella: 216/2014

C1. to C2. Compliance regarding adding health markings

- Health marks shall be applied by, or under the responsibility of, the official veterinarian when official controls have not identified any deficiencies that would make the meat unfit for human consumption.
- The health marking of carcasses of domestic ungulates, farmed game mammals other than lagomorphs, and large wild game, as well as half-carcases, quarters and cuts produced by cutting half-carcases into three wholesale cuts, shall be carried out in slaughterhouses and game-handling establishments.
- The health mark is applied only to animals (domestic ungulates, farmed game mammals other than lagomorphs, and large wild game) having undergone ante-mortem and post-mortem inspection in accordance with this regulation and when there are no grounds for declaring the meat unfit for human consumption.
- Meat from unskinned wild game cannot bear a health mark unless, after skinning in a game handling establishment, it has undergone post-mortem inspection and been declared fit for human consumption
- The health mark may be applied before Trichinella test results are available, if the OV is satisfied that meat from the animal concerned will only be placed on the market if the results are satisfactory.

C1. to C2. Good practice

Health marks may only be applied before Trichinella test results are available if the OV has approved a written procedure that ensures that tested carcasses remain identifiable and under control until negative results have been obtained.

It is essential that the OV verifies that full traceability of the released meat is in place at all times.

Appropriate disposal arrangements need to be made for carcasses with positive results.

L

Legal requirement

853/2004 Article 5: point 3

C3. Food business operators may not remove a health mark applied in accordance with Regulation (EC) No 854/2004 from meat unless they cut or process it or work upon it in another manner.

C3. Compliance regarding removal of health marks

- Health marks are not removed from meat unless operators cut or process it or work upon it in another manner.

C3. Good practice

See 'B5.'