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### Conference Room Document

#### **Position on "Definition of Traceability/ Product Tracing of Foodstuffs" (CX/GP 04/20/6) provided for the 20th session of the Codex Committee on General Principles to be held from May 3-7<sup>th</sup>, 2004 in Paris**

On behalf of the members of CropLife International, we wish to thank the Delegation of France and other members of the electronic working group who have provided the working document, "Definition of Traceability/Product Tracing" for discussion during the 20<sup>th</sup> Session of the Codex Committee on General Principles.

CropLife International is the global trade association representing the plant science industry. Its members are involved in the research, development and commercialisation of agricultural biotechnology products and as such, have extensive experience in participating in the development of, and working under, existing national regulatory frameworks for biotechnology. The global plant science industry is therefore keen to be involved, and to assist where possible, as member governments discuss the future definition of Traceability/ Product Tracing.

The Draft document which includes the proposed definition for traceability/product tracing provides a good summary of the historic work conducted in Codex across all Committees and Tasks Force. The thorough treatment is useful in providing guidance about consideration that has been given to the topic and why the definition is so important to future work of Codex Committees, including the Codex Committee on General Principles.

As noted on page 2/9 (paragraph 9) of the paper, the CCFICS Working Group on Traceability/Product Tracing considered the "elements" of product tracing. Those elements have not, however, been agreed as the elements encompassing traceability/product tracing in a broad sense. The "Proposed Draft Definition of 'Traceability/Product Tracing' in Appendix 1" of the document is a re-statement of the "elements" of tracing provided by the Working Group from CCFICS.

**We do not agree that these elements adequately characterize a definition for traceability/product tracing, but rather are *potentially elements of some product tracing efforts.***

We believe that the elements provided might be useful in development of principles for tracing but are not appropriate to a definition.

With respect to the information provided in Appendix II of the document, we do not believe these issues are germane to consideration of a definition. The issues discussed would be more appropriate to development of implementation guidance, which we believe is beyond the scope of work to be undertaken by CCGP in development of a definition.

We appreciate the opportunity to provide input and look forward to participating in the discussion of these issues in the 20<sup>th</sup> Session of CCGP in May 2004.