Dear Sir/Madam,

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.

We appreciate the opportunity to respond to the request for comments on a “Preliminary Set of Principles on Traceability/Product Tracing,” [CL 2004/6-FICS, April 2004]. We continue to believe that such a set of principles is critical to establishing a framework for appropriate tracing of food and food ingredients as dictated by a specific, stated objective. We support continuation of this work in CCFICS and appreciate the leadership taken by Australia in advancing this work.

The Australian Secretariat has done a good job in characterising the discussion that has taken place in, and the written comments received to date from, countries and Codex Regional Coordinating Committee meetings on the issue of Traceability/Product Tracing. We strongly support the comments of the CCLAC (paragraph 2) and CCAsia (paragraph 9) that there should be case by case consideration on the need for tracing, and also agree that the needs and capabilities of developing countries should also be taken into account when considering the purpose and cost of a traceability system.

CCAsia’s criteria for assessing whether there is need to trace are useful. We strongly agree that tracing should be:

- for a specific objective;
- considered as part of risk management, but only after an appropriate risk assessment has been conducted;
- subject to a cost/benefit analysis; and
- should not be used as a technical barrier to trade.

With those considerations in mind, we also support the comments made by NASWP in relation to components to consider for health and safety (SPS) reasons versus those for other legitimate objectives (TBT). We also believe that it is worthwhile considering “what to trace” rather than “how to trace.” Most countries have in place systems for tracking products in the marketplace in the event, for example, that a product recall might be required.
We offer the following specific comments on the Preliminary Set of Principles for Traceability/Product Tracing in supporting food inspection and certification systems.

- **Point 1** - Fair trading practices objectives should be reworded to be consistent with Codex language (ie: to ensure fair practices in food trade). More importantly, we believe it is necessary that the objective for the tracing be clearly stated.

  Traceability/ Product Tracing is a risk management tool that may be applied within a broader food inspection and certification system applied for the purposes of meeting a stated food safety objective and/or to ensure fair practices in food trade.

- **Point 3** - We do not believe that Traceability/Product Tracing can appropriately inform how the food was changed. Traceability/product tracing may be used to locate a food, not to identify it, and from there to follow the movement (trace it) one step forward and one step back. In so doing it can provide all of the information necessary to meet the stated objective.

  Traceability/product tracing may be used to:
  a. Locate a food in an identified food system; and/or
  b. Follow the movement of a food i.e. from where the food came (one step back) and to where it was sent (one step forward).

- **Point 4** - Traceability should be based on information that is relevant to its stated objective, verifiable, and should be no more trade restrictive than necessary (to meet the stated objective).

  Traceability/ Product Tracing initiatives utilized within a food inspection and certification system should be considered according to the stated objective and should be:
  a. Verifiable
  b. Consistent with practices to ensure fair practices in food trade
  c. Subject to equivalence determinations- this should be deleted as it does not relate to the process of tracing, but rather to other management tools
  d. Least trade restrictive option consistent with the stated objective
  e. Take account of the needs of developing countries- this should be deleted as it is out of context here. Such needs could be taken into account when considering the other matters listed here.
  f. Cost effective
  g. Outcomes based- this should be deleted as tracing is a tool that is used to meet a stated objective. It should not be the end in itself.
  h. Practical under the circumstances under which Traceability/ Product Tracing is being applied as a risk management tool
  i. Enforceable (should be a separate issue from practicality).

Thank you again for the opportunity to provide comment on this important work. We have appreciated the opportunity to be involved both in the work of CCFICS and in the working group on traceability. We strongly believe that this preliminary set of principles for Traceability/ Product Tracing will form a good basis for consideration and discussion during the upcoming meeting of CCFICS.

Kind Regards,

Christian Verschueren