

Christian Verschuere
Director General

Ms. Ann Backhouse
Manager
Codex Australia
Australian Government Department of
Agriculture, Fisheries and Forestry

Brussels November 13th, 2003

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**Comments on CX/FICS 03 /4- "Discussion Paper on
Traceability/Product Tracing in the Context of Food Import and Export
Inspection and Certification Systems"**

Dear Ms. Backhouse,

CropLife International appreciates the opportunity to provide comments on the above paper. We strongly believe that the traceability/product tracing work within the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) is both timely and important.

We commend the CCFICS working group (WG) on its thorough analysis of the "elements" of traceability/product tracing in existing CCFICS texts. We agree with the conclusion of the WG that these texts contain elements of product tracing. Further, we believe that as these texts were not intended to address product tracing, there is no need to expand the texts. We do not support re-opening or redrafting CCFICS texts to include language on traceability/product tracing, and believe that there are better mechanisms to ensure that elements of traceability/product tracing are integrated into food import and export inspection systems.

In considering the work product generated by the second meeting of the WG in September 2003, CropLife International believes the paper is complete; we commend the WG for accomplishing its mandate.

The following input is to be responsive to the specific request about the future work of CCFICS on traceability/product tracing:

1. We support initiation of work on principles for the application of traceability/product tracing within CCFICS, which could provide the most useful tool for countries considering or applying tracing in their import and export inspection and certification systems. Such a document would also be more timely than the development of a guidelines document or reconsideration of the CCFICS texts. CropLife International therefore supports option 3A of the WG "options" paper.
2. Priority for the principles work in CCFICS should be placed on SPS objectives.
3. CCFICS should consider the work of the Codex Regional Coordinating Committee for North American and South West Pacific (NASWP) on traceability/product tracing as a beginning document for development of principles.

The global plant science industry is keen to be involved, and to assist where possible, as member governments move toward the establishment of traceability/product tracing principles within Codex. We support CCFICS as the appropriate venue for the work and encourage this Committee to start work on the development of such principles as soon as possible.

Thank you again for the opportunity to provide these comments.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'CV', with a long horizontal flourish extending to the right.

Christian Verschueren