

ICPSC Conference on Product Traceability and Tracking Labels – Meeting Summary

Framing the Issue

Presentations from the regulators outlined the reasons for introducing enhanced requirements for product traceability and tracking labels – upstream traceability allows for market surveillance and allows consumers to contact businesses in the case of safety problems while downstream traceability allows the identification of those who have received and purchased product and can be a crucial success factor in the recall effectiveness and reduction of product safety related injury.

There is interest in harmonizing requirements globally while still allowing flexibility. A number of options are available from very simple (e.g., barcodes) to very complex technical solutions (e.g., active RFIDs).

No questions/comments from the participants

Global Traceability Infrastructure (GTI)

This GSI project is leading the development of the necessary standards and governance for the implementation of global traceability and data sharing systems.

Supply chains are complex but the systems must allow easy access to tracking information at all steps from production to packaging to distribution to consumers. The GTI is intended to be independent of the technology and the means of accessing the information. By bringing different solution providers together to define commonalities of functionality, the project will help to define the infrastructure and the necessary governance model.

The project leads are still looking for participants from government, customs organizations and small/medium sized enterprises. Please see: <http://www.gsl.com/> for more information.

Questions and comments from the Participants:

- *Are other organisations doing the same thing? No. There are other related projects but this project is unique particularly by focussing on the deployment of the standards (ie, implementation) since it is being driven by the members, including industry.*
- *Comment: Wherever possible, GSI standards are ISO or CEN standards.*
- *Comment: Germany is developing related standards for imports – download of customs data to the authority; also single window projects – and seeing increased need for integration of customs data but need a legal basis for acquiring, using and sharing the data. This project gives the platform and therefore the option for voluntary participation.*
- *Comment: This project is supported by the EU with permission to use its logo which also allows discussion with other jurisdictions including the US.*

Panel Session on the Needs of the Regulator, Consumer and Industry

Regulators are looking to traceability and tracking labels not only as a means of tracing product in the event of a recall but to also assist with market surveillance. Without information on who made a product and when, the regulator will be forced to cast the net very widely when asking for corrective action. Although the regulators can foresee eventually getting to a highly regulated international system, they are looking for simpler approaches to address the issue in the short-term.

Consumers want safe products, internationally harmonized market surveillance and manufacturers that take responsibility for their product. They do not accept globalization of the supply chain as an excuse for not taking action. With respect to tracking label technology, consumers are also concerned about privacy and environmental impact and want these concerns addressed in the solutions considered.

Industry sees product traceability as they key to product safety. This information allows for more efficient assessment of incidents and quicker decisions on recalls. Downstream traceability increases the effectiveness of a recall but industry is also concerned with protecting consumer privacy.

Questions and comments from the Participants:

- *Is there consensus on the primary focus on children's products? Yes*
- *Comment: There seems to be a lot of attention on RFID technology but so far the problems don't seem to have been resolved.*
- *Has product traceability really improved a recall? Yes, there is anecdotal evidence (e.g., previously would have had to recall 150,000 units, with improved traceability, that number is reduced to 15,000). Issue now in some industry sectors is to focus is traceability on components.*
- *Comment: Additional needs of regulator include the traceability of certificates of conformity which in many instances is as important as the traceability of the product itself.*
- *Will consumers prefer the approach where will need to take the step of checking a website or going to a reader station or would they rather an active tracking label that for instance, will light up in the event of a recall? Consumers are not a homogeneous group – e.g., there are different levels of use of internet (socio-economic, generational). Combining technologies may be useful.*
- *Does traceability impose the necessity of industry to develop quality systems? Consumers and enforcement bodies are concerned with end result. There is probably room for experimentation with implementation. There is some infrastructure in place to support traceability but also concerned that imposing standard requirements could incur costs to those that have systems already in place.*
- *What about so-called “anonymous products”? Technological solutions are a good alternative to product registration for these types of products but at this point any marking would be beneficial.*
- *Comment: The US requirement for product registration for children's products allows for the possibility of using RFID technology as an alternative,*

- *Comment: The name on the product may have no relation to producer.*
- *Comment: Currently, systems for barcodes are propriety and regulators and consumers have no access.*
- *Comment: A barcode could comply with the current US requirement for tracking labels, however currently, barcodes may only be on packaging and not on the product.*
- *What is the role of ISO standards? Standards for anti-counterfeit tools may overlap somewhat.*
- *Comment: Food and veterinary products require a huge system of traceability to support their systems – are we asking for this for consumer products? Can a system be built that doesn't impose huge infrastructure costs?*

Open Session with Presentations and Comments from Interested Parties

- *Traceability helps control your product from design through to the consumer. For adequate traceability, products need a unique identifier – flexible, not-serialized, traceable to date and time, and secure.*
- *Independent inspection bodies play an important role – it is estimated that 25% of the world's consumer products go through their hands and 65% of that does not meet requirements the first time. They recognize the necessity of sharing more information with the regulatory authorities and that issues around traceability and confidence in certificates of conformance are important since they are used for market surveillance.*
- *Tracking labels and record-keeping for traceability will not be adopted voluntarily and that jurisdictions that do not have mandatory requirements should be seriously considering them. It is possible to have mandatory requirements that allow flexibility. Feasibility is also recognized as a major issue with some products.*
- *The ICPSC goal of harmonizing requirements globally is appreciated.*
- *The goals of identifying product manufacturers (responsible party), limiting scope of product recalls and the ability of consumers to identify products being recalled are recognized but the factors effecting recall effectiveness are complicated.*
- *Any requirements should allow flexibility. What is feasible and practicable for small production runs and small manufacturers is not the same even within the same product category.*
- *For now, a stepwise approach will be taken, particularly with respect to standardized requirements but industry should see that they may be coming down the road in order to support harmonization.*