



# Traceability in a global context

International Consumer Product Safety Caucus  
Conference on Product Traceability and  
Tracking Labels

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# Overview

- The importance of traceability
- Current EU requirements
- Some data
- Challenges and way forward



# Importance of traceability

- Traceability is not an end in itself but allows for effective market surveillance and corrective actions
- Upstream traceability: identification of actors from whom a business/consumer has sourced products or components:
  - allows businesses to carry out safety assessment and ensure safety in the supply chain
  - allows authorities to ensure market surveillance and enforcement
  - allows consumers to contact business in case of safety problems

# Importance of traceability

- Downstream traceability: identification of actors/consumers to whom a business has supplied their products:
  - allows businesses to take effective corrective action
  - allows market surveillance authorities to monitor and enforce corrective actions
  - Allows consumers to report safety problems efficiently

# Requirements under the GPSD

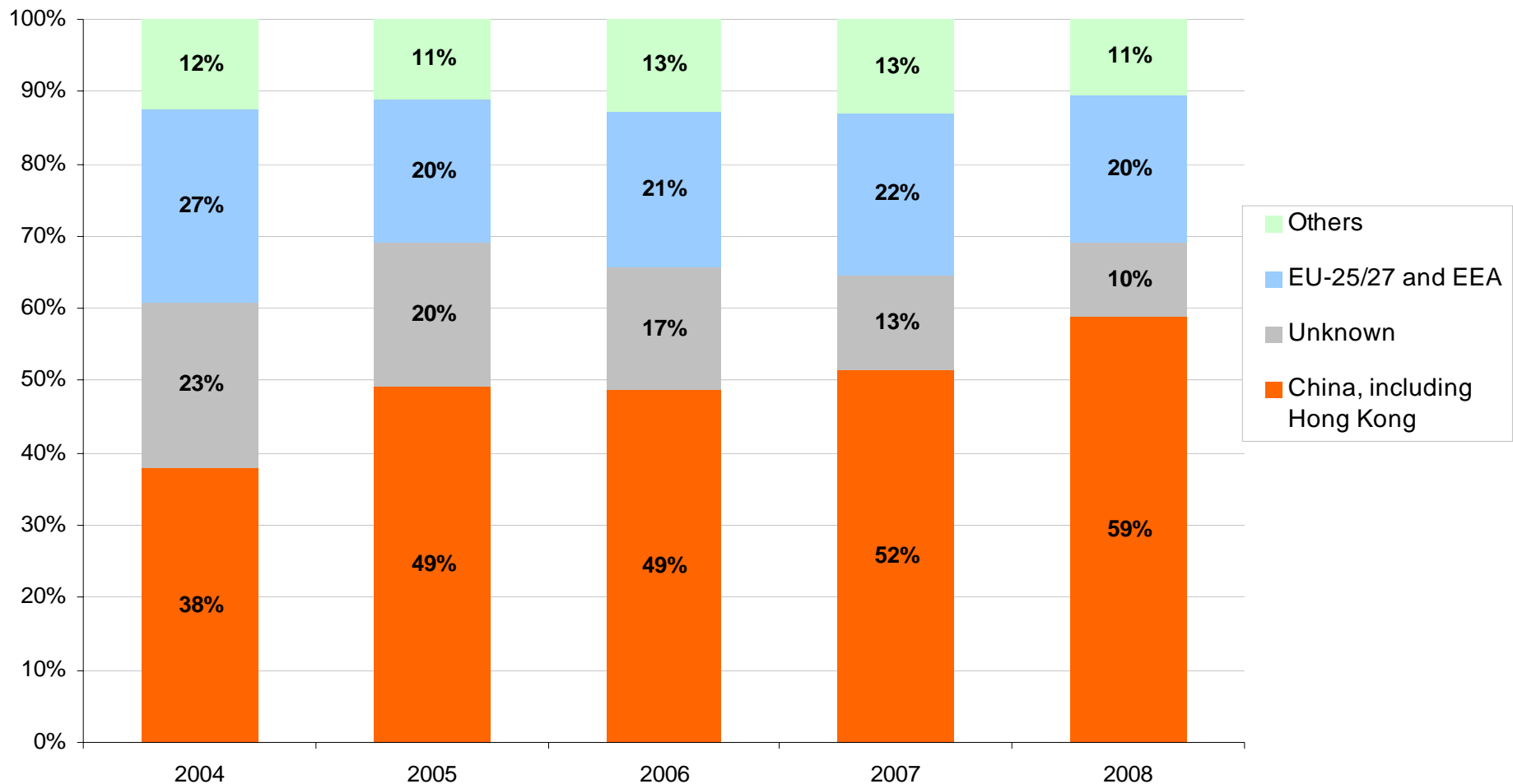
- Producers must be informed of risks posed by their products → this is difficult if you do not know who is supplying you with products or individual components
- Producers must be able to take appropriate action to deal with unsafe products that they have supplied → this requires batch marking and the inclusion of producer contact details on packaging
- Distributors must keep and provide the documentation necessary for tracing the origin of products, and cooperate in corrective action

# Requirements under the New Legislative Framework for products

- Common framework for the marketing of “harmonised” products
  - to be reflected in sector legislation
- Required information:
  - name, registered trade name or registered trade mark, address where the manufacturer/importer can be contacted;
  - type, batch or serial number or other element allowing product identification
- Distributors need to be able to identify suppliers one level upstream and downstream

# RAPEX Statistics

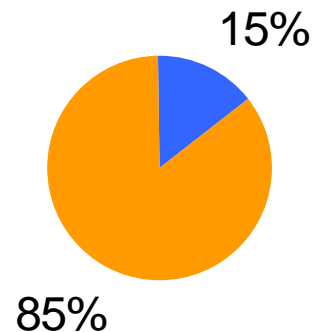
## Notifications by country of origin (2004-2008)



# RAPEX Statistics

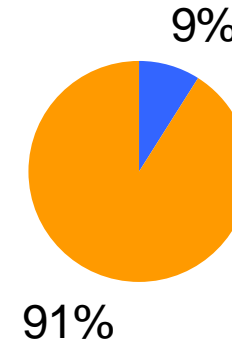
Indication of brand of dangerous product,  
allowing identification and related traceability

**2007**



■ Brand unknown ■ Brand known

**2008**



■ Brand unknown ■ Brand known

## European Business Survey 2008

- 35% of respondents would have trouble tracing products in the supply chain
- 15% identified as a particular challenge in a product crisis, the identification and communication with customers
- 24% identified as challenging getting the relevant product back from consumers or the supply chain

## Business survey (continued)

- The vast majority of respondents are confident that their companies could in crisis:
  - quickly identify the supplier of any individual ingredient or component part in a particular batch of products (81%),
  - obtain necessary technical data about a product at short notice (80%) or
  - quickly and easily access copies of all relevant supply agreements (68%)
- Upstream traceability is considered better under control than downstream traceability

More information available at:

<http://www.freshfields.com/publications/pdfs/2008/mar10/21238.pdf>

## Challenges in ensuring traceability

- Global sourcing and complex supply chains
- Limits of controls
  - Volume and speed of imports
- Limits of jurisdictions
  - Difficult (if not impossible) to impose solutions beyond own jurisdiction



## Challenges in ensuring traceability

- Challenges of data management systems
  - E.g. scope, quality, confidentiality, data protection
- Limitations of labelling
  - E.g. counterfeiting
- Privacy concerns



## Way forward

- In global markets, international cooperation and solutions are necessary to enhance traceability
- Global compatibility of solutions needed
  - Comments possible in WTO/TBT context

## Way forward

- Scope for global solutions needs to be explored
  - EU leaves flexibility to the economic operators as to how to fulfil the requirements for specific sectors and products
  - Discussions with other regulators and check for compatibility of existing traceability requirements
- Address needs of other stakeholders including businesses and consumers

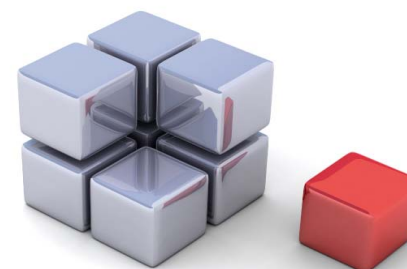
# Thank you for your attention!

For more info, please see

<http://www.rapex.eu>

and

<http://ec.europa.eu/enterprise/newapproach>



**RAPEX**