

North American Approach to Tracking Labels

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United States

- Section 14(c) of the *Consumer Product Safety Act* already authorizes the CPSC to require by rule, the use of *traceability labels on any consumer product*
- Effective August 14th, 2009, *Consumer Product Safety Improvement Act*, Section 103 will require tracking labels for children's products (consumer products for children 12 and under)

United States

- The manufacturer, to the extent practicable, must place permanent, distinguishing marks on children's products and packaging to enable:
 - the manufacturer to ascertain the location and date of production of the product, cohort information (including the batch, run number, or other identifying characteristic) and any other information needed to determine the specific source of the product
 - the ultimate purchaser to ascertain the manufacturer or private labeler, location and date of production of the product, and cohort information
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Canada

- ❑ No generic requirements for tracking labels in the current *Hazardous Products Act* or the proposed *Canada Consumer Product Safety Act* (CCPSA)
 - ❑ Product-specific requirements in certain regulations to print the manufacturing date, lot # on the packaging and/or product
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Canada

- ❑ Regulations could be developed to enhance those requirements applicable to individual product categories or children's products in general
 - ❑ Is there value to stakeholders for Health Canada to bring in requirements for tracking labels similar to the US requirements?
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Tracking Label Requirements

- Recognized by regulators that it's in the interest of all stakeholders that a uniform approach be taken:
 - Consumers can become better educated about the meaning of such labels and as a result, be better informed in the event of a recall
 - Manufacturers will have greater certainty in meeting regulatory requirements globally, will be able to identify affected products more readily and production management costs may be reduced
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Defining Uniform Requirements for Tracking Labels

- When it is “practicable” to have traceability labels on children’s products and / or packaging?
 - What is the impact for consumers and manufacturers of permitting manufacturers and private labelers to comply with labeling requirements with or without standardized nomenclature, appearance, and arrangement of information?
 - How should the information be presented, including the use of national languages and / or other languages and / or codes that require reference keys?
 - Is there value of requiring traceability information in electronically readable form?
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Defining Uniform Requirements for Tracking Labels (cont'd)

- By what method a consumer should obtain the name of the manufacturer of a private label product?
 - What is the lead time needed to comply with marking requirements?
 - Are there successful traceability models that already exist in other jurisdictions?
 - What are the other questions and issues to be considered in defining requirements?
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