

**DIRECTORATE FOR SCIENCE, TECHNOLOGY AND INDUSTRY
COMMITTEE ON CONSUMER POLICY**

Working Party on Consumer Product Safety

Global Tracking and Traceability Exercise

Questionnaire

The Working Party has been working closely with the International Consumer Product Safety Caucus on global tracking and traceability issues. In support of this work, the attached questionnaire has been developed, with a view towards collecting the views of stakeholders on key issues.

Responses to the questionnaire would be appreciated by 30 April 2014. They should be sent to the OECD (peter.avery@oecd.org).

Contact: Peter Avery; Tel: +33 1 45 24 93 63; E-mail: peter.avery@oecd.org

JT03352219

Complete document available on OLIS in its original format

This document and any map included herein are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area.

SUMMARY AND ACTION POINTS

1. The OECD Working Party on Consumer Product Safety is seeking input on the feasibility of improving tracking information on consumer products.
2. As a result of work already undertaken, the working party has identified three key areas in which it would like to focus its further thinking. These are:
 - The types of information that could be provided on consumer products.
 - The potential for a uniform and globally recognised approach to its display.
 - The need for positioning global tracking information in close proximity to other locally required information.
3. This document provides background information on the project and identifies areas where input from stakeholders would be appreciated. Such information should be forwarded to the OECD (peter.avery@oecd.org) by 30 April 2014.

GLOBAL TRACKING/TRACEABILITY INFORMATION EXERCISE QUESTIONNAIRE

Background

1. The International Consumer Product Safety Caucus (ICPSC) initiated a Global Tracking/Traceability Exercise in September 2009 as a joint assessment among the staffs of several consumer product safety authorities. Its purpose has been to explore new and useful ways to inform consumers and regulators about a product's identification and source. For regulators in particular, the initiative also has explored ways to better understand a product's supply chain. The OECD Working Party on Consumer Product Safety has been following this work, and is interested in playing a greater role in advancing it. In this regard, the Working Party bureau agreed to work with the ICPSC to develop further information, thorough a questionnaire that would be circulated to stakeholders.

2. During the development of this initiative, the ICPSC looked into how supply chain traceability information, which currently is often generated by and accessible to industry operators themselves, could be made more accessible to consumers and to regulators. An underlying objective has been to find approaches that might also have the potential to be useful on a global basis.

3. The ICPSC group also considered possible characteristics of a product tracking/traceability label that would have global recognition and utility for consumers, regulators or enforcement authorities, and industry. Such a label could include markings that would provide consumers with the information necessary to identify a product that has been the subject of a public announcement, or to enable them to describe accurately to safety authorities a product of concern. The label also could contain information that regulators might use to describe hazardous products accurately in announcements to consumers, as well as information that will help regulators trace the origin of the product.

4. Based on their study, the participants note that the ideal tracking/traceability information would display a globally recognized unique identification mark or code for that specific product. The identification mark or code would be supported by a data system with a mechanism for regulators to access non-public information about the product, such as the actual manufacturer (in the case of privately labelled goods), manufacturing site identification, and supply chain information. It should be stressed that the information shown should be sufficiently meaningful for consumers.

5. In addition to regulators, economic operators in the manufacturing and distribution chain may also benefit from globally recognized unique identification codes on products to identify and isolate hazardous products and problems that may have contributed to hazards in other products. Many manufacturers and retailers already operate sophisticated systems for internal production, distribution, and inventory controls. However, they may utilize proprietary¹ markings that are not understandable to parties outside the system, while the importance of the product identification information on a global scale is ever increasing. Moreover, if a product leaves the intended distribution chain as surplus material or due to bankruptcy, reconditioning, or

¹ As used here, "proprietary" means the use of formats, coding, media, etc. unique to a specific enterprise and not aligned with an international product identification standard.

second-hand resale, proprietary tracking systems may be meaningless to the new down-stream operators, impeding their ability to react to product safety issues. For these reasons, proprietary systems would be of limited value to this global initiative.

6. The Global Tracking/Traceability exercise was launched following the ICPSC's Stockholm Conference on Product Traceability and Tracking Labels, which took place on 10 September 2009. Regulatory staff from 18 jurisdictions participated. The schedule included a morning session open to the public and an afternoon session for regulators only. The morning session served as a platform for reviewing the regulatory requirements for tracking and product identification in several major jurisdictions and for allowing stakeholders to present their views to regulatory staff. During the closed afternoon session, regulatory staff reached consensus on several points, among them that regulators have an interest in exploring some (undefined) level of harmonization in tracking and traceability policy.

7. Over the course of several ICPSC meetings since Stockholm, the "Tracking Label" Project was defined and has progressed in a number of aspects. Baby strollers (also known as pushchairs in some jurisdictions) were identified as a model product to visualize the possible application of this initiative due to the greater vulnerability of the population associated with the product (small children), the widespread use of the product, the sufficiency of product surface area, and the minimal financial impact on industry and consumers due to small cost percentage for the tracking and traceability marking relative to cost of the product. Product safety regulators from Australia, Brazil, Canada, the European Union, Korea, and the United States volunteered to work on the project, while leaving it open for others to participate.

8. It should be noted that participation by the experts in these jurisdictions has not carried with it any implication that any of the jurisdictions will adopt the project's final recommendations or findings, nor has consensus carried any formal connotation.² This Working Party document carries the same caveats. It is also noted that the ICPSC participants did not contemplate work toward an international instrument implementing the outcome.

9. The Working Group appreciates the input already received from industry experts who have provided significant information on types of tracking and product identification solutions during numerous meetings on this initiative. Consensus among the participants evolved along a number of lines, as described below.

Uniform tracking information: What information is needed and how should it be displayed?

10. The participants are of the view that the tracking label would offer the greatest value if it were to contain a unique product identifier and access to relevant company information, as well as relevant production information, and that the marking should be organized and displayed based

² It is stressed that the views expressed during project discussions and summarized in ICPSC documents have been those of staff and should be considered informal. They do not imply endorsement, in whole or in part, by any jurisdiction's leadership as a basis for current or future policy making, nor do they necessarily track with the current or contemplated requirements of participating jurisdictions. As used in ICPS documents for this project and in this Working Party document, "consensus" refers only to topics, questions, and potential solutions deemed useful for exploration in the context of this joint exercise. It does not imply that any approach, conclusion, or area of specific consideration is being contemplated by any of the participating jurisdictions.

on a widely used international standard.³ Global commercialized systems based on international standards for managing and displaying such information (in characters or symbolically) already exist and are used widely in industry.

11. After analysing comments received from stakeholders during this consultation process, the Working Party will explore the possibility of consensus on the specific types of information that would be most useful to be accessible from the tracking/traceability label by regulators, and whether that differs from that accessible to consumers.

Globally recognizable target area: Potential usefulness

12. Participants in this exercise have discussed the value of describing a particular space on the product, where tracking information would always be located and that would always be recognizable by consumers and regulators or enforcement authorities. Such a space, whether defined by colour or shape or outline, could help clarify which mark, code, symbol or characters found on a product might be helpful tracking information. For example, many products now carry multiple bar codes. A number of participants thought that a uniform target area might be useful but that the concept should be thoroughly discussed with stakeholders, to know also how they would see the cost and the benefit from their perspectives.

Additional locally required information: Proximity

13. Participants recognized that human language requirements and other local laws and regulations often will necessitate product identification or the use of other tracking and traceability markings, other than the potential global markings discussed under this initiative. The participants were of the general consensus that it would be ideal for the globally recognizable tracking/traceability label to be located in close proximity to other, locally required traceability markings.

Questions for Stakeholders

14. The Working Party is seeking the views of stakeholders in the areas that follow. For full consideration, comments should be submitted to the OECD (peter.avery@oecd.org) not later than 30 April 2014.

1. What international standards are available to support a combination machine readable and human readable (visual) product marking that provides a unique consumer product identifier specific to the product's configuration? Are there also international standards available that in addition would allow the identification of the products' specific contents of components, and its specific retail packaging? Do the standards mentioned above support a web based, typed-entry look up function for the human readable product marking that would allow consumers to view basic information about the product and its origin?
2. What international standards are available to support a machine readable product identification system (combined with the human readable function described above) that could allow regulators restricted, web-based access to additional details about the

³ The meaning of "international standard" here is the same as that understood within the context of the World Trade Organization Agreement on Technical Barriers to Trade.

product registrant of record or manufacturer? In addition, are there international standards that also define other aspects of the supply chain, such as the manufacturers of certain components used in the product?

3. What difficulties or challenges would the potential use of a globally recognized target area for tracking information, whether defined by colour, shape, outline, or other characteristic, have for industry? What would be stakeholders' preferred method for identifying a globally recognized target area?
4. How would consumers benefit from the use of a globally recognized target area for displaying the product and original supplier identification information and related tracking information on consumer products?
5. What are the costs and benefits of using or not using tracking labels on products informing consumers about product identification, the producer, and where it was manufactured? How can costs or benefits be quantified?
6. What are the costs and benefits of having tracking information on a product for authorities including detailed information on the product supply chain. How can costs or benefits be quantified?
7. What other recommendations could you make to industry and market surveillance authorities on best practices to improve product tracking and traceability for consumer products globally?