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Economic Commission for Europe

Steering Committee on Trade Capacity and Standards

Working Party on Agricultural Quality Standards**Specialized Section on Standardization
of Fresh Fruit and Vegetables****Seventy-first session**

Geneva, 9–11 May 2023

Item 7 (a) of the provisional agenda

Review of existing standards:**Discussion of proposals resulting from the last session****Proposal by the delegation of the Kingdom of the
Netherlands to amend the Standard layout for standards on
fresh fruit and vegetables****Submitted by the delegation of the Kingdom of the Netherlands**

The following proposal was submitted to the Specialized Section for consideration.

I. Proposal

The Kingdom of the Netherlands proposes to change the provisions concerning marking of the Standard layout for United Nations Economic Commission for Europe (UNECE) standards concerning the marketing and commercial quality control of fresh fruit and vegetables by allowing GPS coordinates together with the nearest town and country of residence to replace a physical address in the case when there is no unique physical address or officially registered code mark. For example: GPS (52.047264655155224, 4.470959282901845), Zoetermeer, the Netherlands.

Under section VI. Provisions concerning marking A. Identification:

“Packer and/or dispatcher/exporter:

Name and physical address* (e.g. street/city/region/postal code and, if different from the country of origin, the country) or a code mark officially recognized by the national authority⁵ if the country applying such a system is listed in the UNECE database.”[Footnote to add:] “* In case there is no unique address or officially recognized code mark, GPS coordinates together with nearest town and country shall be accepted as address.”

⁵ The national legislation of a number of countries requires the explicit declaration of the name and address. However, in the case where a code mark is used, the reference “packer and/or dispatcher (or equivalent abbreviations)” has to be indicated in close connection with the code mark, and the code mark should be preceded by the ISO 3166 (alpha-2) country/area code of the recognizing country, if not the country of origin.”



II. Justification

A. Introduction

At the 2022 session of the Specialized Section on Standardization of Fresh Fruit and Vegetables, the Quality Control Bureau (KCB) of the Kingdom of the Netherlands strongly advocated to remove the word “physical” from the required identification of address of the packer and/or dispatcher/exporter (ECE/CTCS/WP.7/GE.1/2022/16).

B. Why does the standard require an address?

The reason for identification of a (physical) address on the packaging is to enable traceability of the produce, in case of irregularities or nonconformities.

In case of a nonconformity of the quality of produce, the rejecting inspection body must be able to inform other inspection bodies or authorities of its findings.

Information about the shipment and the identity of the packer and/or the dispatcher (with name and address or official code mark) is sent to the inspection agency of the country of origin/dispatch/export. The address is used to identify the packer and/or the dispatcher.

C. Conclusions

At the 2022 session of the Specialized Section, the following was discussed (ECE/CTCS/WP.7/GE.1/2022/16):

- (i) in many situations, there is no unique physical address (companies should never feel compelled to fabricate a non-existent address in order to appease an inspection authority as this could risk encouraging fraud);
- (ii) at the import stage importing companies cannot solve the problem of a non-existent address;
- (iii) for the receiving country (country of import), it is very hard (impossible) to verify the existence of a (non-unique) address abroad and distinguish P.O. Box addresses in any language;
- (iv) it is a common practice for official bodies to identify and register a packer and/or dispatcher/exporter by P.O. Box address where applicable (where no unique address is available), e.g.:
 - Codex accepts P.O. Box address
 - The European Union system TRACES New Technology (TNT)¹ accepts a P.O. Box address.

It is the primary responsibility of the inspection authority of the country of origin (the country of the packer and/or dispatcher/exporter) to check the validity and traceability of the address used on labels. In case of irregularities upon import, the competent authority in the country of origin of the product (the country of the packer and/or dispatcher/exporter) will be informed, and this authority must be able to trace back the address.

The Kingdom of the Netherlands does not find it a workable situation to require a physical address for all situations, and thus strongly advocates removing the word “physical” from the provisions concerning marking/identification and proposes to accept the GPS coordinates together with the nearest town and country of residence as the physical address in case there

¹ TRACES NT (TNT) is the European Commission’s digital certification and management platform for all sanitary and phytosanitary requirements, supporting the importation of animals, animal products, food and feed of non-animal origin and plants into the European Union.
https://unece.org/fileadmin/DAM/trade/agr/meetings/OtherMtgs/eQuality_June2020/TRACES_NT_-_Demo_10.06.2020.pdf.

is no unique physical address or officially registered code mark. (For example: GPS (52.047264655155224, 4.470959282901845), Zoetermeer, the Netherlands.)

The Kingdom of the Netherlands also makes an urgent appeal to other countries to register code marks used by the national authorities in the UNECE Code Mark Registry.
