TRACEABILITY GUIDELINES
FOR UEBT CERTIFICATION

Traceability provides assurance to the industry and consumers about the origin of a product or raw material. It can be a way to see information about the conditions in which raw materials are harvested or collected and to know that certain practices are not present such as deforestation or child labour.

Traceability protocols can also help promote good training and fair prices for collectors, farmers and field operators because a good traceability system often helps companies identify problems and then work to correct them.

> For UEBT, traceability is essential to make sure that the Ethical BioTrade Standard is respected in the field and throughout the supply chain.

DEFINITIONS

UEBT defines traceability as the ability to identify, track and trace elements of a product from their point of origin and as they move along the supply chain from raw material to finished product.

There are three types of traceability systems that are used in different certification systems:

- **Identity preservation** doesn't allow mixing of certified products. This means that you can trace individual products back to the originating farm or collection site.

- **Segregation** follows the product through each part of the chain so that at the end you know the product actually came from a certified source. Certified and non-certified raw materials cannot be mixed. But certified raw materials can be mixed with other certified raw materials.

- **Mass balance** allows certified and non-certified materials to be mixed. The exact volume of certified material entering the operation is controlled, and then an equivalent volume of material leaving the operation can be sold as certified. This is common for products where segregation isn't possible and results in claims of "contains X%" of certified raw materials (although some certification systems allow claims of "certified" once a minimum percentage of certified content is reached).

UEBT requires Segregation as minimum level for its certification program

The critical requirements in the UEBT standard are:

Documented traceability system with clear procedures, control points and responsibilities.

Product identification where, at a minimum, the raw material can be identified back to the farm/collector and area.

See Criterion 4.4 of the Ethical BioTrade Standard for more information.

Documentation is important in traceability

Some key documents include:

- harvest records
- purchase records
- purchase slips
- name of farm
- delivery slips
- receipt at the processing unit or factory
- conversion rates
- sales records
- stock records

The UEBT certification mark

Traceability supports the truthfulness of sustainability claims, such as the use of the UEBT certification label on products.

WHAT ELSE IS REQUIRED?

Companies can have a traceability system that is simple or elaborate depending on the scale and complexity of their production system as well as the level of technology implemented by the local actors.

All traceability systems should have these requirements in place:

- **A written description of the traceability system**, including critical control points and a clear description of the supply chain with all actors involved and the flow of the raw materials.

- **Records in place**, and support for the different actors in the supply chain to also keep good records of harvests, deliveries, receipts, volumes, prices and areas of cultivation or collection.

- **Segregation protocols**, so that certified raw materials are not mixed with non-certified during handling, processing, storage or sales. This might include separate locations or packaging, different processing runs, or more. This is especially important for contracted services, where measures must be taken that these service providers in transport, processing or storage also segregate and trace the certified material.

- **A coding system**, to record relevant details such as the field of origin, date of harvest, date of processing, date of packaging, name of farmer or collector involved through a system of lot numbers and/or codes.

- **A monitoring system for more complex supply chains**, such as cultivation areas with large groups of farmers, or wild collection sourcing. This should be a local monitoring system implemented by the local organisation. The system should assess whether the traceability system is implemented by all the actors involved and as defined by the certificate holder in its internal policies.

- **Training for farmers and collectors**, and other actors on the traceability system and its requirements so that they understand what their role is in its implementation.

Wild collection and traceability

Wild collection presents special challenges in traceability since it is often informal, with many intermediaries involved. In addition, collectors often are sensitive about recording data about themselves if this could be used by host governments to detect their immigration status, their earnings, or more.

Likewise, competition among suppliers for collectors can be high and it is also often unclear where the collection takes place, as land ownership and access rights vary.

Calculating costs

It can be challenging to calculate the costs of production, especially for collectors involved in wild collection activities. However, with traceability in place, costs are easier to calculate. For example, costs vary a great deal and some collectors spend more or less time traveling to the collection area.

Some may have higher or lower yields due to varying skills levels or due to the availability of the raw material. In addition, collection of raw materials may only be a piece of their income and they may not work a full day at this activity.

See Principle 3 of the Ethical BioTrade Standard for more information.

Tips for implementing a good traceability system

- **Start small** if your supply chain is complex. Define a reduced scope to start your traceability system such as certain areas or collectors.

- **Understand challenges and risks** in the defined scope of your traceability system. These might include whether actors are willing to implement improvements, if there are sub-suppliers to involve, if there is a good level of trust, if there are other channels where the raw materials are sold, etc.

- **Investigate existing practices and other initiatives** that may be in place already for collection areas and local actors. There may be recorded data already available.

- **Identify local organisations** such as local service providers or NGOs that can support the implementation of the traceability system.

- **Train local actors** on the traceability system so they understand their role. Inform them of the benefits of such a system so they will be willing to provide information.

- **Check the system regularly** by developing a local monitoring system to ensure your traceability system is effective and reliable.

- **Create a written agreement with sub-suppliers** so that they are fully aligned with the need to implement a traceability system. The agreement should set out their clear responsibilities.

- **Use simple language and focus only on the essentials** so that you are creating tools that are manageable by local people and that do not intrude on people's privacy.

For more guidance and training on traceability systems, please contact UEBT at certification@uebt.org

Front image: Mallow *Malva silvestris*