

**TRADE AND AGRICULTURE DIRECTORATE
COMMITTEE FOR AGRICULTURE**

OECD Seed Schemes

REPORT ON THE USE OF LABELS IN THE OECD SEED SCHEMES

This paper, prepared by the Co-ordinating Centre, is circulated to Delegations, National Designated Authorities and Observers for information and discussion at the 14th Technical Working Group Meeting [under item 7 of draft agenda TAD/CA/S/A(2014)1] to be held in Edinburgh, UK, on 30-31 January 2014.

This revised version includes an explanatory note on the requested revisions to the working document as discussed during the 2013 Annual Meeting.

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EXPLANATORY NOTE ON THE REQUESTED REVISIONS TO THE WORKING DOCUMENT

1. The report on the use of labels in the OECD Seed Schemes [TAD/CA/S/WD(2013)7] was first presented at the 2013 Annual Meeting. During the discussions delegates raised the issue of retaining a system which is cost-effective, standardised and open to all countries to use, in the same way that labels have previously provided. There was some concern voiced that, if new methods of container identification are adopted some countries would be unable or unwilling to install the necessary equipment or software to read the contained electronic information. Whatever system is agreed will need to be supported by seed companies for whom container identification is of major importance too.
2. The paper does not make any proposal to move away from the current labelling practices. Instead it seeks to identify other methods of identification for containers which can be used in addition to labels and which might bring advantages either in authentication of the container and contents, or in reduced handling of the containers by agents of the National Designated Authority or by speeding up the gathering of identification data. For instance, a machine-readable electronic labelling system would provide a more rapid data entry to check against the data provided from the originating country.
3. Delegates requested more information on the scale of the problem of fraudulent labelling of seed and also how NDAs discover and deal with the problem. This matter will be dealt with by a verbal report from the Secretariat at the meeting of the Technical Working Group in January 2014.
4. Additional inputs were to be provided by other members present at the meeting, these are also to be presented at the meeting by those concerned.
5. Delegations are invited to discuss the current document and to consider which developments could be beneficial. (For example by speeding up seed handling, helping with stock control, aiding security or reducing physical re-stacking of bags.)

REPORT ON THE USE OF LABELS IN THE OECD SEED SCHEMES

1. The system of identification currently used for containers of seed is essentially the same as that in use when the OECD seed Schemes were first established in the middle of the twentieth century. The basic simplicity of the system and universal ease of understanding the information on the labels means it fulfils many needs simultaneously.

2. The labels are an integral part of seed certification schemes. The first point of the OECD Seed Schemes' Basic principles of Annex 1 to the decision contains the words "The Schemes authorise the use of labels and certificates for seed produced and processed for international trade according to agreed principles." Very early in the establishment of the Seed Schemes (first under the OEEC and subsequently under OECD) the distinctive design and colours were specified for the labels used for the Seed Schemes. The system has operated in a largely unchanged form since the beginning of the OECD Seed Schemes which adopted the existing labelling method from certification schemes established long before that.

3. The OECD Rules stipulate a basic design for labels and specify the OECD member NDA as the authority with permission to use and control the use of OECD labels on seed which meets the requirements of the OECD Seed Schemes rules. Labels must be fixed in such a way that they will remain attached to the seed container for as long as required and may also be used as part of the security sealing process. The arrangements for carrying out this process are assessed as part of the pre-membership evaluation mission. Seed bearing OECD labels is therefore seed which has met the requirements of the OECD Seed Schemes.

Current labelling rules

4. Each member country has to submit specimens of their OECD labels to the Secretariat for approval before they are introduced. The labels all follow a standard colour scheme denoting the category of seed for which the label is used, details of this may be found in Common Appendix 3 (Annex 1).

5. All labelling operations, including label and seal removal prior to re-packing must be supervised by an authorised representative of the OECD NDA. As an alternative, the label may be indelibly printed on the container but the image must conform to the same colouring and contents as the normal label, the printed label on the container must be approved by the NDA and a model of the information printed on the container submitted to the OECD Secretariat for approval.

6. Seed which has been produced, certified and labelled in one country can be re-packed or blended in another country, but the NDA remains in overall control of the operations and must keep records sufficient to maintain tracking of seed from its origin to the final user. The new labels must bear the information that the seed has been re-packed and labels applied to seed and the country or countries of origin for the seed must be indicated on the labels.

Benefits, uses and limitations of labels

Advantages of current labelling systems

7. Over time, the label has remained one of the chief tools for ensuring the transfer of seed in a container is identified correctly as well as being a means of sealing the container in a tamper-proof manner. This is a fundamental requirement for a system which tracks seed through generations of production and provides quality assurance for varietal content.

8. There are many reasons why the label has proved so useful. In their simplest form they are cheap to produce using materials which are easily available and can be attached using any one of several fixing methods. Labels can also be produced on demand if it is found that additional containers need to be sealed or labels are spoiled during the labelling process. Depending on the purpose of the label the method of fixing will vary to give a greater or lesser degree of assurance that the seed has not been tampered with. A label can also take the form of an area of information printed on the container using the distinctive layout and contents of the “ordinary” label. Once applied, the label generally requires no special equipment to read the information printed on it, although the language used may not be the native tongue of those who need to read it.

9. Standardised label formats aid understanding without need for a full translation of the wording on the label and the units quoted are internationally recognised. For seed labelling, the internationally recognised species name is used to identify the crop. Further aid to understanding can be achieved if the label format as well as the information layout is standardised in a unique and recognisable pattern; however there are limitations on the degree of standardisation which can sensibly be achieved because of the need to allow flexibility within the format for the use of differing production methods and materials. This results in a distinctive design which is identifiable to users as part of a control system which certifies the quality of the contents and, by virtue of the colour coding system for the different categories of seed, also conveys information about the type and category of seed contained and hence the expected use of the seed.

10. With the addition of a serial numbering or similar system, each label used can be made distinct from others of the same type and when combined with records of use and control of issue this can become a powerful system for tracking containers and thereby tracking their contents. In addition serial numbering offers the possibility of using the uniqueness of the labels as part of the method of sealing the container against tampering since the unique labels cannot be replaced once they have been spoiled, for example by removing a row stitching which passed through the label. Once the basic information is in place there is the possibility of including additional information on the label giving details of treatments applied to the seed or other useful facts. To make them effective, the use of serial numbers requires that the issuing authority should control the production, distribution and use of the labels as well as keeping records of the containers to which they are attached and the status of the contents of the containers.

11. To be effective the label has to remain with the container to which it refers, this means the method of fixing the label and the construction of the labels must be able to withstand the stresses caused by handling during transport and storage as well as other substances it may come into contact with. Different solutions may be adopted for containers according to their construction, size and the conditions they will encounter during transport and storage. Newer types of label material can mean the requirements for labels change. The requirement to place a label inside the container as well as fixed to the outside was a means of providing information if the outer label became damaged or detached. With the introduction of tear resistant materials instead of card or paper, many fewer labels were lost and the requirement for the internal label could be removed.

12. Sealing systems for containers have evolved with the availability of newer methods. An early technique for sealing used systems applied to the cord used to fasten the container. The label was threaded on the cord and was therefore sealed to the container by the same means. The seal consisted of a metal device which had tabs that interlocked and to prevent re-opening once the seal was applied. Lead seals were also applied, using special pliers which imprinted a unique design on the lead as it crushed the lead tightly around the cord. Later, with the widespread introduction of sewing techniques for closing fabric seed bags, a unique label could be placed so the stitching passed through it. Recipients are expected to query any containers where there is evidence of holes where previous stitching was in place. Labels for this purpose could be either adhesive or non-adhesive.

Disadvantages of current labelling systems

13. Whilst the current labelling system has many advantages and functions which have been added since the first requirement to identify the contents of a container, there are also ways in which labels are less effective. Most obviously, with the advent of modern colour copying and computer scanning, design and printing, the simple label is open to forgery and counterfeit labels can add significant value to seed which was not grown under the proper controls or had not met standards. In order to check the authenticity of a consignment of seed containers, which are individually labelled and bear label serial numbers, it is necessary to examine each of the labels in the consignment. If serial numbers are used as extra security, the numbers need to be manually recorded, whether by writing them down or by entering them to a computer before checking with the issuing authority that the numbers on the containers match the originals. Physical movement of containers is often necessary to examine the labels and this can be both labour intensive (even if mechanical handlers are used) and time consuming as well as introducing the possibility of damage during handling.

14. The use of labels to provide assurance and a level of uniqueness relies on several factors for success. The assumption is that labels are applied at source in a uniform and recognisable manner. The security relies on the ability of the individuals who handle the containers to identify labels which are suspiciously damaged. A row of extra stitch holes may be easy to see if only a few containers are examined, when the number handled is greater it takes more effort to observe the condition of each container label. Even if suspicious damage is seen, the system still relies on the individual reporting the matter and checking the records against the records held by the source certifying authority.

15. The distinctive design and colour of seed labels is an aid to the rapid identification and imparts knowledge about the contents of the container. Many countries go to considerable lengths to have labels which are produced to a strict and identifiable pattern. With everyday exposure to the design and familiarity with the design, labels which do not conform in all details are relatively easy to identify. Restricted numbers of designs therefore aid the security process. OECD has 58 member countries situated all over the world. Each country produces labels to its own design, some countries produce more than one variation of the basic format, for example where a federal system is in existence; all labels are identifiable within their own territory. OECD seed is traded between countries and it becomes a much more difficult task for staff to be familiar with the range of labels legally available and the occasional changes to colour, design or quality which may be deliberate or related to the production process. It is very difficult to identify irregular labels when the ones presented may be the first ones from a particular country ever seen by the operative. Considerable experience is required to differentiate authentic labels from counterfeit labels, particularly when labels from a country have several different forms or issuers and may have differences of the shade of colour, print face or the information presentation. Even the addition of anti-counterfeit measures such as the use of special paper or the incorporation of distinctive logos and printing invisible under ordinary light can only be of help where the people handling the containers are aware of the measures.

16. To examine each label on a consignment of containers, it is necessary to view each container. This may be allowed for in the stacking or packing system when all labels are placed to be visible without re-stacking. Where this is not the case, accessing all containers in a lot is time consuming and many seed containers do not lend themselves to rapid handling processes. During the label examination process information on the labels has to be transcribed before it can be checked with the issuing authority. Machine readable information on the labels can help speed this process but the individual containers still need to be examined.

17. Finally, there is sometimes confusion between the act of applying a label and achieving a suitable security seal with a label. Whilst having a label with information about the container contents provides the

first level of security by identifying the contents, it does not necessarily provide evidence of tampering unless further conditions apply to its fixing. This would be the case where a label is placed in an open pocket on the outside of the container or where techniques for fixing the label leave minimal traces of the fixing on the label, for example the relatively small and inconspicuous holes left by staples.

Survey results

18. 30 countries responded to the questionnaire about labelling, the authors are grateful for the help received from the NDA which responded. A copy of the questions included in the questionnaire is appended to this report (Annex 2).

What materials do you allow labels to be made from?

19. 20 countries specifically mentioned some form of damage resistant material in their response, the remaining 10 used some form of paper, card or board. Two of the countries used both tear resistant labels and either paper or card labels.

How are the labels affixed to the seed container?

20. All but two countries gave stitching to the container as their principal method of attachment, the other two specified adhesive. This implies that most containers to which labels are attached can be stitched and are either fabric or paper. Generally this would also indicate a relatively small size for each container labelled to allow for the stitching process.

Are there any special printing requirements for label design?

21. There were few special requirements identified at this stage, three countries use bar codes or allow bar code usage, three countries need print registration marks on the label to allow placing of overprinting. N.b. See later section on security measures

What problems do you have with current labelling practice?

22. Most who replied reported no problems with the practices although there was some reporting in this area about supply problems. The most common problem reported was adhesive failure, others reported printing errors, stitching problems where more than a single row is applied, the size of labels which does not accommodate enough other information and readability, either through label inaccessibility or printing issues.

What problems do you have with current labelling materials?

23. The most common report was “no problems”. Of those reported, material quality was most common with ten reports. Damage to labels whilst in use was reported by seven and this category included problems with failure of the adhesive used or tearing and loss of labels. Others reported were label supply; this category included long waits for delivery of labels, specific materials shortages and printing compatibility.

Are the labels suitable for all labelling situations? E.g. large bulk containers

24. Most replies (twenty) agreed that labels are suitable for all situations but there were a significant number of replies (nine) which stated labels were not universally suitable. In some cases other secure sealing methods are used to supplement the labels. Others stated they were only suitable for containers to

be sewn or for a particular size range of container. Fixing to the container presented problems to some whilst there was one report of the labels being unsuitable for small containers

How do you ensure counterfeit labels are not used?

25. The replies in this section showed a general awareness of the possibility of counterfeiting and various measures in place to counteract it. Serial numbering of labels (15) was most commonly reported, often in conjunction with either being sole supplier for labels (14) or record keeping (14) and audit (10). Elsewhere security paper was used and a range of unique symbols or print which is readable only under special lighting.

Is the label the best secure way to identify a container of seed?

26. Most believe labels to be the best method (28) but there were several answers where further clarification was given in the comments where some reported a preference for labels plus information on the containers (3). Bar codes and other methods of attaching information were mentioned (2).

Do you have experience of other systems for container identification? Please give details

27. Most countries have experience only of labelling for container identification (28). Of the remaining countries, marking information on the container, including information from the company, is used. One report of microchip use was given.

Have you considered other methods for container identification? Please give details

28. Most countries (23) state they have not considered other methods for container identification, those that have report printing on a bag, barcodes, adhesive labels and codes. One country has considered a range of alternatives containing the above plus RFID and novel label materials.

Do you consider the label and seal gives adequate security to the container contents?

29. All respondents consider labels to give adequate security to the container contents. Where more information was supplied it was evident that the security relies heavily on observation of the condition of the labels and the presence of redundant stitch holes. One country noted the system is not suited to bulk containers and trucks.

What methods of container sealing do you use?

Method	Countries using method	Countries not using the method	No information
Stitching through label	25		5
Finger & thumb seal	11	8	11
Lead sealing	4	14	12
Plastic ties	11	9	10
Staples	1	17	12
Adhesive	17	6	7
Other	4	3	21

30. The “Other” category included the following methods: Air-valve paper bags, metal seals requiring special pliers, inclusion of a control strip in the container and a 1, 2, 3 (a, b, c) sealing system.

Future labelling possibilities for the OECD Seed Schemes

31. The rules as they are currently drafted require a system using printed information either on a separate label or printed on the seed container. Attachment to a container may be one of several methods, the most frequently used being to stitch through a label when sealing the container. When the scope for “labelling” is extended to include:

- systems of data transfer with the seed,
- rapid information retrieval from the containers,
- reduced requirement for physical movement of the containers to retrieve identification data,
- systems to provide additional security and help prevent the introduction of uncertified seed with false labelling.

32. There are several existing possibilities to be considered. Because of the need for investment in data reading equipment, it is likely that these systems would be introduced in addition to the existing label system which would be retained as a system which can be read by the human eye.

33. Establishing and maintaining a robust traceability system is vital to operating a secure quality system for certified seed transport/transfer which ensures regulatory compliance and consumer confidence.

34. Benefits of traceability:

- Legislative compliance,
- Product safety,
- Certification,
- Improved efficiency,

- Supply chain monitoring,
- Competitive advantage.

35. While the primary aims are to prove authenticity and combat fraudulent practices, the other potential benefits may include improved turnaround times. For instance, inspections by customs and plant health officials at borders can be bottlenecks and inadvertent barriers to trade.

36. The two main elements of traceability are physical tracking and administrative or clerical tracking and these can already be addressed through the use of physical labels and a database/recording package.

37. It is essential that the physical labels are:

- compliant with legislation,
- affordable,
- visually readable,
- robust and rip-proof.

38. It is also desirable for them to be electronically readable to reduce transcription errors and increase speed of throughput.

39. To achieve the maximum value and advantage from its use, it is essential that any sort of database used for tracking seed consignments is:

- compliant with legislation,
- affordable,
- harmonised system between all OECD countries,
- accessible for all member countries.

40. It would also be desirable for the system to incorporate real-time tracking to prevent 'multiple copy' fraud.

Summary table of labelling options

Option	Advantages	Limitations
1D barcode	cheap to produce	limited information capacity
	cheap scanning equipment required	can be difficult to read if slightly damaged
2D barcodes	can store much more info than 1D	scanners more expensive than 1D
	quicker and easier to scan	different types of code, PDF417, data matrix, QR
Tamper evident labels	cheap to buy	human intervention required to read
	can contain barcode info	

Infrared	cheap to buy	limited shelf life, especially under harsh conditions
	can contain barcode info	
RFID tags*	can be scanned without needing direct access to label - whole pallet scanned without unloading	cost of tags
	can be placed within seed bag to prevent removal	cost of scanning equipment
		signal strength and receiver distance issues - need to select most appropriate system for working environment and consignment size
Smartwater	unique	cost
		application
		registration/batches
		readability
Nanometer fluorophores	invisible in normal light	cost
	resistant to cleaning/acids etc	visible under specific UV light but not read electronically
EPC and EPCIS (Electronic Product Code Information Service) global standard	international standard	cost of setting up and maintaining system
	full traceability	
	database for interrogation	
POD (proof of delivery)	real-time data, geo-positioning, time stamping, image scanning, signature on receipt	cost of hardware
		cost of software

Barcodes

41. 1D barcodes offer a simple, cheap and effective method of displaying small amounts of data in an electronically readable manner. 2D barcodes can contain significantly more data and are much quicker and easier to scan, although the scanners are more expensive to purchase than 1D readers.

42. Barcodes can be applied to an extensive range of label types and materials. Tamper evident labels can be used to seal bags / packages and show if any attempt has been made to remove the label or open the consignment.

“Invisible” printing

43. Infrared or ultra-violet printing technology can be used to reduce the production/use of counterfeit labels. It is easy to check if labels are authentic using infrared or ultra-violet light sources.

Radio Frequency Identification (RFID)

44. RFID technology covers a wide range of options, from the basic passive systems which simply reflect back energy waves from the reader, through to the active Real Time Locating Systems with beacons transmitting signals at pre-set intervals.

Summary of Radio Frequency Identification options

Option	Advantages	Limitations
Passive - low frequency	less susceptible to interference, no battery hence unlimited lifespan	range of approx 1 metre, slow data transfer
Passive - high frequency	faster data transfer than LF, no battery hence unlimited lifespan	higher power consumption
Semi-Passive	faster readability	limited battery lifespan
Active – transponder	saves battery by only emitting signal when prompted by reader. longer range 25-100 metres, larger memory	higher cost, limited battery lifespan
Active - RTLS	beacon emits own signal at specified intervals	higher cost, limited battery lifespan - 10 years

45. The main benefit of RFID is that it does not require any line of sight or human intervention. Whole pallets of goods can be scanned without the need to unpack or see the labels, speeding up throughput and improving quality of tracking. The RFID systems can be seen as a solution to a single problem or as an infrastructure approach. Whatever the rationale, the basic components remain the same. Each system consists of tags, readers, servers and software. The specification depends on the distance to be tracked, the accuracy required and the importance of data security. The choice of tag will depend on whether they are to be applied to bags/carton, incorporated into the physical labels or placed within the contents of the bag. Prices vary greatly according to the scale of the project but can range from a few cents for the cheapest tags through to tens of thousands of dollars for the higher end systems incorporating readers and software. The different types of equipment are covered by a variety of ISO standards in order to meet quality assurance scheme compliance.

46. Used for maximum benefit, RFID can be used in conjunction with EPCIS (Electronic Product Code Information System) which is a global standard for traceability of goods. It should be noted that there are significant infrastructure costs associated with setting up and maintaining this sort of system on a global scale.

47. With enough investment in hardware and software, this technology can also be linked through to proof of delivery, with real-time data, geo-positioning, time stamping, image scanning and signature on receipt close out the traceability process.

Other security methods

48. Smartwater and nanometer fluorophores can be used to prevent fraud in the form of counterfeiting but do not enable data to be stored and transferred electronically. They are usually produced in batches applied to multiple units rather than as a unique identifier for each consignment.

Conclusions

49. There are several security enhancing systems already in use by OECD NDA which include the uniqueness of the label design, control of supply, serial numbering of labels, use of special papers, special printing techniques, unique logos and printing which is only visible under special lighting. There are also, no doubt, other systems in use too which have not been reported here. Although there is a standardised overall design for the form and content of OECD labels, each NDA issues one or more versions of this format. Using the system of stitching labels into place provides an assurance that the container has not been tampered with as long as seed recipients look for and are aware of the significance of additional holes in a label or other damage.

50. OECD operates for international trade and has an increasing membership. For an operative to identify aberrant labelling, it is first necessary for them to know what is normal, this becomes more difficult to achieve as the number of acceptable label sub-types increases and different anti copy methods are included. The fact that high quality and versatile copying and printing equipment is becoming more readily available to produce less obvious copies makes it desirable to investigate measures that can help maintain the credibility and integrity of the OECD Seed Schemes. E-cert is another approach currently being explored by the Schemes, some measures given above would be natural partners to an e-cert system. The availability of an e-cert system which allows access to other NDA data would make it possible to check that seed and serial numbers received have the same details as the seed despatched. This can be done by manual examination of labels and hand-transcription of serial numbers to a computer but would be much more efficiently carried out using electronic readers. Bar codes of various sorts are already used to carry some of this data, they are easily included on current labels but they require visual access to each label in a consignment of seed. The greater data capacity of RFID and the possibility for interactive data recording without having to re-stack containers offers benefits of accuracy, speed and also security although with the drawback of requiring substantial investment in systems for applying, reading, recording and transmitting the data. Systems of this sort are already in use for some commodities, it may be possible to reduce the cost of introduction if co-developed with other shipping processes which need to use similar equipment, for instance those of the courier companies or those for phytosanitary controls.

51. Current OECD labelling rules do not mention other systems apart from standard labels; other systems can therefore be used as long as the prescribed OECD labels are in place. If other systems were adopted it would be desirable for users to agree a standardised format for encodement and reading to avoid incompatibilities and the need for multi system installation. It may also be necessary for their use to be regulated under the Schemes.

ANNEX 1: COMMON APPENDIX 3 OF THE OECD SEED SCHEMES RULES AND REGULATIONS

Specifications for the OECD Label or Marking of Seed Containers

1. Description

1.1 *Type:* Labels may be *either* adhesive *or* non-adhesive. The information may be printed on one side only or on both sides.

1.2 *Shape:* labels shall be rectangular.

1.3 *Colour:* The colours of the labels shall be:

□

- | | | |
|---|--|-----------------------------------|
| - | Pre-Basic | White with diagonal violet stripe |
| - | Basic Seed | White |
| - | Certified Seed, 1st Generation | Blue |
| - | Certified Seed, 2nd Generation or successive generations | Red |
| - | Not Finally Certified Seed | Grey |

On all red labels and all grey labels for Certified Seed of second or further generation the appropriate generation number must be stated.

One end of the label shall be overprinted black for a minimum distance of 3 cm, leaving the rest of the label coloured.

1.4 *Material:* The material used must be strong enough to prevent damage in ordinary usage.

2. Reference to the OECD Scheme

Reference to the OECD Scheme shall be printed in English *and* in French within the black portion of the label or on the outside of the seed container (see Rule 9.1.2). This shall read: "OECD Seed Scheme" and "Système de l'OCDE pour les Semences".

3. Information on the Label

3.1 *Prescribed Information (see below for the information required within the Sugar Beet and Fodder Beet Seed Scheme):* The following information shall be printed in black type on the coloured portion of the label (white, blue, red or grey):

- Name and address of National Designated Authority:
- Species: (Latin name)
- Variety denomination (or synonym):
- Category: (Pre-basic, Basic, or Certified Seed, 1st, 2nd or other generation)
- Lot Reference Number: (see Common Appendix 2)

- Country of production: (if the seed has been previously labelled as Not Finally Certified Seed).
- Region of production: (for local varieties)
- Statement of re-packing and re-labelling: (if applicable)

On the label for *not finally certified seed* shall appear the statement:

- "Not Finally Certified Seed"

For *Pre-Basic Seed* there shall be a statement of the number of generations by which the seed precedes Certified Seed, 1st generation.

3.2 The space allowed and the size of the lettering shall be sufficient to ensure that the label is easily read.

3.3 When the information is marked indelibly on the container the layout of the information and the area marked shall conform as closely as possible to a normal label.

3.4 *Additional Information on the Official Label*

3.4.1 Official Additional Information: Any space not occupied by the information in paragraph 3.1 may be used for such additional information as the National Designated Authority wishes to give. Such information, however, must be in letters not larger than those used for the prescribed information. It shall be strictly factual and related only to seed certified according to the OECD Seed Scheme. No advertising matter may be used on the label or in the area of the container on which the prescribed information is indelibly marked.

3.4.2 Non-official Additional Information: At the discretion of the National Designated Authority in the producing country, barcodes can be placed at the periphery of the official label, within a non-official space of not more than 20 per cent of the total area of the label, to be defined by a different colour background and bearing the title "Information contained within this space is non-official, non-endorsed and not verified by the National Designated Authority"

4. Languages

All information shall be given in either English or French except reference to the Scheme that must be in both English and French as specified in paragraph 2 above. Translations into any other language may be added if thought desirable.

