

Product Identification and Traceability

Ensuring Full Identification and Traceability throughout all Stages of Production, Storage and Handling

Development

To define detail, scope and purpose.

Development

This information can be used to develop food safety and quality programs that meet the requirements of modern Regulatory, Customer and Industry Standards:

- We take the time to explain the expectations and requirements of food safety and quality compliance as these relate to your food safety and quality programs.
- You may choose to use our Premium Resources to build, enhance or upgrade your food safety and quality program.
- We encourage you to share this webpage with any food compliance associates and peers you believe may benefit from our commitment to providing our users with user-friendly information and resources to achieve superior Food Compliance Culture.
- We welcome your suggestions for additions of general or specific content through the haccp.com Contact Page.

Key Definitions for Product Identification and Traceability

- Batch or Lot: A quantity of a food, ingredient or material produced, processed or packaged under the same conditions in a defined period and identified by a unique code.
- FIFO: FIFO is an acronym for First In, First Out; a method of inventory control where the stock of a given product first placed in store is used before more recently produced or acquired goods or materials.
- Identification: Identification is the means by which a product, material or batch is marked with a unique identifier so that it can be recognised and distinguished from others.
- Mock Recall: A mock recall is a planned exercise that tests the ability of a food business to trace a product through the supply chain and to locate and account for the affected quantities within a defined time.
- Product Identification and Traceability: Product Identification and Traceability is the method used to ensure that all items including raw materials, packaging, work in progress, and finished products are identifiable and traceable to their source.
- Rework: Rework is food, ingredients or materials that are returned to the process after being held back from normal processing, under controlled conditions that maintain food safety and traceability.
- Trace Back and Trace Forward: Trace back is following a product or ingredient back through the supply chain to its source. Trace forward is following a product or ingredient through to where it has been supplied or used.
- Traceability: Traceability is generally defined as the ability to trace and follow a food, feed, food-producing animal, or substance intended to be, or expected to be incorporated into a food or feed, through all stages of production, processing, and distribution.

Product Identification and Traceability Development

When considering the development, documentation, and implementation of Product Identification and Traceability within food safety and quality management systems, the following information should be considered to ensure effective outcomes:

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Development requirements in relation to their items.

About Product Identification and Traceability



Ingredients held in sealed containers must remain identifiable.

The primary reason for having a functional traceability system in place is to ensure safe food and to aid in the removal of unsafe food from the marketplace. A logical and systematic form of product identification is integral in such a system. Such a program must allow trace back and trace forward of all finished products, ingredients, and other raw materials. This system must be validated and verified to ensure it is effective.

All raw materials and finished products must be identifiable and traceable at all stages of the process from receipt to finished product, including process steps where process deviations such as work in progress and reworking occur.

A food business should have documented policies and procedures that detail how products are identified at all stages of the process, including the following aspects:

- All foods and ingredients should be labelled at the end of production and before storage. Items must also be relabelled where they have been removed from their previous container. As a minimum, the product label should include the product name and a best before or use by date;
- All foods should be covered before labelling, and must not be compromised by the action of covering or labelling;
- A physical description of how waste, rework, raw materials, work in progress and, where applicable, allergenic materials should be defined;
- A first in first out policy should be applied to all products in storage;
- Raw ingredients are to be stored in original packaging or in sealed containers to prevent the risk of allergen cross-contact or foreign body cross-contamination;
- Pre-existing labels should be removed to reduce confusion and to allow sufficient cleaning and sanitising of the container they were adhered to;
- If day type labels of different colours are used, dates and descriptions should also be used to provide sufficient information about the item;
- If an item is to be frozen, it should contain sufficient details including the date of freezing and any special instructions;
- If coloured utensils, containers, cleaning equipment, or chopping boards are used for specific product types or tasks, this should also be outlined in the policy;
- A description of how raw materials and finished products are batched and date-coded;
- Frozen items should also be dated when they are removed from frozen storage for defrosting; and
- The shelf life of perishable products invariably alters from the manufacturer's original 'Use By' or 'Best Before' date once the original container or pack has been opened. Appropriate labelling will be used to indicate the new 'Use By' or 'Best Before' date.

Further information on allergens can be found within the haccp.com Allergen Management Food Standard Element.

Reworking Product Identification and Traceability

For some products, the coding system requirements are regulated. For other products, your business may create its own coding system. In either instance, you should document the definition of a lot for each product, how to interpret the lot number on each raw ingredient, how to interpret the lot number on each finished product, and how ingredient lot numbers are linked to the finished product lot numbers.

Where premixing or rework is used, document:

- The parts and interpretation of the code used for premixes; and
- The parts and interpretation of the code used for rework.

Limiting the use of rework to the same lot reduces traceability problems. If rework is used, a system should be devised to ensure that the ingredients of the rework can be traced to the finished product.

Non-conforming Product

It is important to ensure that items identified as non-conforming, whether they be raw materials, work in progress, or finished products, are specifically covered within the Product Identification and Traceability procedures. It is common for non-conforming product to be segregated from conforming stock to ensure no mix-ups can occur. Non-conforming products are commonly labelled with brightly coloured signage or labels to ensure they are easily identifiable. The control of non-conforming products is often linked to procedures for the hold and release of such products.

General Product Labelling



Packaged products for retail sale must carry the labelling required for the food.

Depending on the type of food your customers are buying and the intended usage of the food, it may or may not require labelling. There is generally no requirement for items produced for consumption within the premises where they are made to be labelled with details of ingredients and usage. Labelling requirements for specific products or product groups are defined within the applicable food standards legislation.

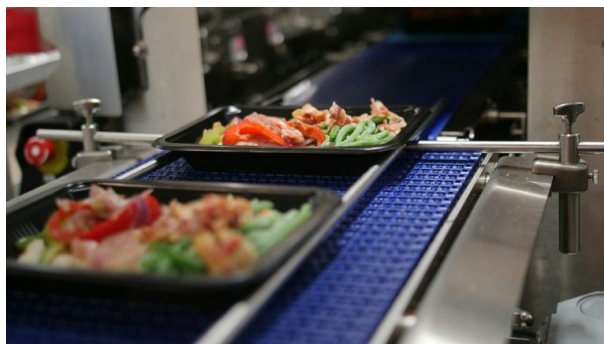
General labelling requirements for products for retail sale commonly include, where required by regulation:

- Product name;
- Manufacturer address and contact details;
- Manufactured on, Use By, or Best Before dates, which must be appropriate to the type of food being packaged and its intended use;
- Ingredients, usually listed in descending order of proportion;
- Allergen information, for example, contains or may contain a specified allergen;
- Specific usage instructions, for example, keep refrigerated and use within 24 hours once opened;
- Nutritional information, such as a Nutrition Information Panel (NIP). The documented content of the NIP must be verified to ensure the information displayed is appropriate;
- Country of origin declaration; and
- Net weight and gross weight.

Labelling aims to provide consumers with information that will ensure they can make an informed decision regarding their choice of food and to ensure its safety at the time of consumption, provided it has been handled and used according to the nominated requirements.

It is important to ensure that labelling review activities are scheduled, conducted, and recorded on an ongoing basis to ensure labels are accurate and meet customer and regulatory requirements. The frequency for labelling review activities is often nominated to meet customer requirements, though annually is a common minimum frequency.

Sub-contract Packaging and Labelling



Sub-contracted packaging activities must be agreed with the customer and documented.

In instances where sub-contracted packaging or labelling activities are conducted, it is of utmost importance that the scope and purpose of interactions of such sub-contractors are documented and agreed upon, both internally and by relevant customers.

It is generally not considered appropriate for food businesses to procure the services of a sub-contracted packaging or labelling supplier without the prior consent of the customer for whom they manufacture foodstuffs. Such customer approvals often include verification of satisfactory standards, including the confirmation of food-grade packaging status.

In instances where Identity Preserved products are handled by sub-contracted packaging or labelling suppliers, it is important to ensure that the integrity and genuine status of such foods are maintained. This is often facilitated through the establishment of assessment and testing routines between food businesses that may enter into sub-contracted packaging or labelling arrangements to ensure the status of Identity Preserved products is not compromised.

The Integrity of Product Labelling and Coding



Labels and codes must stay legible and firmly attached through storage and transport.

Regardless of whether product labelling and coding is pre-printed or applied as part of the packaging process, all forms of product identification and traceability must remain legible and indelible at all times.

Legibility checks are conducted to ensure that the print within the product labelling and coding can be read and understood by the anticipated consumer group. It is also important to consider that regulatory guidelines often specify requirements for defining the legibility of product labelling and coding.

Indelibility checks are conducted to ensure that the product labelling and coding are permanent and will not be

removed through unwanted means. When considering the indelibility characteristics of product labelling and coding, it is important to consider circumstances through which such labelling or coding may become illegible. For example, if the exterior of a frozen product becomes frosted during transport, the excess moisture on the product exterior could potentially cause the product label or coding to become illegible. Environmental conditions, such as high humidity within the packaging and labelling area of the food business, can also potentially impact the integrity of the applied labelling.

Product assessments should be inclusive of labelling and coding reviews to ensure ongoing compliance. Scheduled product labelling and coding verification activities should also confirm the capability to continuously apply legible and indelible labelling and coding. Where product coding is applied within the food business, verification activities are commonly inclusive of a review of the inks being used, the ink application systems and printers, and the surfaces upon which the ink is applied. Other product coding methods, including laser etching and imprinting, may also be verified through a scheduled activity.

The effectiveness of the Product Identification and Traceability system is often verified through a scheduled mock recall activity as part of the haccp.com Product Recall and Product Withdrawal Food Standard Element.

References

- Codex Alimentarius guidelines, including the Principles for Traceability/Product Tracing as a Tool within a Food Inspection and Certification System (CXG 60-2006);
- Codex Alimentarius codes of practice, including the General Principles of Food Hygiene; and
- World Health Organization food safety fact sheet.

Product Identification and Traceability Development Key Points

- Product Identification and Traceability programs must be developed to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The Senior Management of your business facilitate a commitment to ensuring adequate resources to the development of your Product Identification and Traceability program;
- Should you require additional resources for the development of Product Identification and Traceability program elements, please discuss this with the relevant Senior Management representative;
- A properly developed Product Identification and Traceability program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly-developed Product Identification and Traceability program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Documentation

To establish the developed detail in a viewable format to facilitate information.

Documentation

Document: A document provides guidance and/or direction for performing work, making decisions, or rendering judgements that affect the safety or quality of the products or services that customers receive.

Documented policies, procedures, work instructions, and schedules form the basis of any food safety and quality management system. The following documentation formats may be considered to ensure ongoing compliance with specified requirements for Product Identification and Traceability:

- Product Identification and Traceability policy;
- Product Identification and Traceability development procedures;
- Product Identification and Traceability implementation procedures and work instructions;
- Product Identification and Traceability monitoring procedures;
- Product Identification and Traceability corrective and preventative action procedures;

- Product Identification and Traceability verification schedule;
- Product Identification and Traceability verification procedures;
- Product Identification and Traceability validation schedule;
- Product Identification and Traceability validation procedures;
- Product Identification and Traceability training procedures.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Documentation requirements in relation to their items.

You may wish to visit the Product Identification and Traceability Templates section of haccp.com for examples of Product Identification and Traceability documentation, record, and resource formats commonly applied within food safety and quality systems.

Product Identification and Traceability Documentation Key Points

- Product Identification and Traceability programs must be documented to meet relevant Regulatory, Industry, and Customer standards and requirements;
- All documented Product Identification and Traceability program elements must be controlled to ensure compliance;
- Key documented Product Identification and Traceability program elements should be available to your business team at all times to ensure they can facilitate required tasks;
- A properly documented Product Identification and Traceability program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly documented Product Identification and Traceability program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Implementation

To facilitate the application of the documentation.

Implementation

Implementation: Implementation is the application of documented food safety and quality system elements into the actual business operation.

The implementation of Product Identification and Traceability within any food business requires genuine commitment from senior management, staff, and visitors to ensure the nominated goals of implementation are achievable on an ongoing basis. It is a step that requires significant planning and consideration of general and specific food business circumstances to ensure the outcomes of Product Identification and Traceability do not negatively impact the safety and quality of the food items dispatched from the business.

Implementation of Product Identification and Traceability must include a clear definition of responsibilities and authorities for all levels of participation by senior management, staff, and visitors to the site.

When implementing Product Identification and Traceability within a food safety and quality system, you may wish to consider the following requirements before completion:

- Communication and display of the Product Identification and Traceability policy;
- Completion of Verification and Validation of Product Identification and Traceability development procedures;
- Availability of Product Identification and Traceability implementation procedures and work instructions;
- Availability of Product Identification and Traceability monitoring procedures and record templates where applicable;
- Availability of Product Identification and Traceability corrective and preventative action procedures and record templates where applicable;
- Availability of the Product Identification and Traceability verification schedule;
- Availability of Product Identification and Traceability verification procedures;

- Availability of the Product Identification and Traceability validation schedule;
- Availability of Product Identification and Traceability validation procedures;
- Completion of Product Identification and Traceability training procedures;
- Completion of product design and development requirements related to Product Identification and Traceability;
- Completion of process design and development requirements related to Product Identification and Traceability;
- Completion of training for team members who have responsibilities and involvement within Product Identification and Traceability;
- Completion of competency approval for team members who have responsibilities and involvement within Product Identification and Traceability.

To successfully implement the defined policy, the policy should be kept as simple as possible and the appropriate staff should be given training against the policy. Over-complex policies tend not to be successful through staff missing the finer details. Posting relevant signage in relevant areas with appropriate identification information can be a useful tool. An example of this could be:

- On the outside of the work in progress chiller, post a sign detailing that all products must be labelled with a name and a best before or use by date before being returned to storage; or
- Post a sign above chopping boards indicating what colour board is to be used for what task.

For the policies to be implemented properly, management must consider the allocation of resources for the staff to perform the appropriate functions. For example, a bakery may allocate all yellow trays as empty trays for direct contact with the floor only and all red trays to be stacked on top of the yellow trays may contain the product. This type of system only works if there are enough trays of each colour, so that staff does not end up using incorrect coloured trays for an incorrect purpose and creating a risk of cross-contamination.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Implementation requirements in relation to their items.

Product Identification and Traceability Implementation Key Points

- Product Identification and Traceability programs must be implemented to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Your Product Identification and Traceability program must be fully implemented as per relevant documented Policies, Procedures, and Work Instructions;
- The implementation of Product Identification and Traceability requires a commitment to the provision of resources by the Senior Management of your business;
- A properly implemented Product Identification and Traceability program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly implemented Product Identification and Traceability program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Monitoring

To review, confirm and document evidence of the implementation against documented limits.

Monitor

Monitoring: Monitoring is the act of reviewing and confirming measurable parameters of a defined process or product status.

Monitoring requirements within food industry sectors are generally identified against limits of acceptability defined within HACCP plans, implementation procedures, and work instructions. Monitoring usually includes some element of record-keeping, which may be maintained manually or through digital systems. Records should be controlled and retained as described within the haccp.com Document and Data Control Food Standard Element. It is important to consider that advancements in technology have spawned many systems and processes which are self-monitored and/or self-adjusted when variances are identified. Regardless of the system used, the goal of any monitoring

activity is to provide sufficient evidence that any limit of acceptability has been met.

Traditional Product Identification and Traceability monitoring requirements include manual recording and the application of corrective actions when the results of monitoring are found to be outside acceptable limits. Corrective Actions should also generally be strongly linked to the monitoring process where applied to ensure full traceability of the applied actions.

Common monitoring activities and record formats may apply to Product Identification and Traceability:

- **Receival Records:** Receival records are commonly maintained to include details of batches or lots of items received. These recorded batch or lot numbers can be used to assist in traceability activities;
- **Manufacturing Records:** Manufacturing records commonly contain details of the batch or lot of items as they are used;
- **Packaging Records:** Packaging records are commonly inclusive of the identification and traceability details of items being packaged, along with the finished packaged product batch or lot coding;
- **Dispatch Records:** Dispatch records commonly include details of the customer to which finished packaged items are destined. Record formats are commonly inclusive of the batch or lot details of the product being dispatched;
- **Order Picking Records:** Order picking records commonly confirm the products, batches or lots selected for each customer order, supporting accurate dispatch and trace forward;
- **Production Traceability Records:** Production traceability records commonly link the batch or lot numbers of ingredients and packaging to the finished product batch or lot produced; and
- **Production Volume Records:** Production volume records commonly show the quantities produced, used and remaining, allowing quantities to be reconciled (mass balance).

Records may or may not be kept for monitoring product identification and traceability policies. More commonly, the policies are physically monitored every day by the supervising staff to ensure they are correctly implemented, and then verified as part of a GMP audit or review on a weekly or monthly basis.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Monitoring requirements in relation to their items.

You may wish to visit the Product Identification and Traceability Templates section of haccp.com for examples of Product Identification and Traceability documentation, record, and resource formats commonly applied within food safety and quality systems.

Product Identification and Traceability Monitoring Key Points

- Monitoring provides real-time confirmation and evidence that your risk-based FS&Q Controls are effectively implemented;
- Product Identification and Traceability programs must be monitored to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Monitoring of Product Identification and Traceability must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated monitoring records for Product Identification and Traceability must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly monitored Product Identification and Traceability program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly monitored Product Identification and Traceability program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Corrective Action and Preventative Action

To apply “real time” interventions to documented monitoring limits.

Corrective Action and Preventative Action

Corrective Action: Corrective action is mandatory action to be taken when a deviation to the Quality System occurs, particularly to a Critical Control Point.

Preventative Action: At any step in the process where a hazard has been identified, preventative action must be put into place to prevent re-occurrence.

Corrective Action and Preventative Action are implemented to ensure identified non-conformance issues are documented, investigated, and rectified within appropriate timeframes. Corrective action is any action applied to regain control over a product, process, policy, or procedure that has been identified as being non-conforming outside nominated limits of acceptability. Preventative action is any action applied to prevent any identified non-conformance from reoccurring.

The outcomes of corrective and preventative actions should result in regained process control after effective application. Specified corrective actions are commonly linked to the HACCP Plans and the food business certification process.

Below are Corrective Action and Preventative Action examples which may be associated with Product Identification and Traceability related non-conformance:

- Review of the Product Identification and Traceability policy;
- Review of Product Identification and Traceability development procedures;
- Review of Product Identification and Traceability implementation procedures and work instructions;
- Review of Product Identification and Traceability monitoring procedures;
- Review of Product Identification and Traceability corrective and preventative action procedures;
- Review of the Product Identification and Traceability verification schedule;
- Review of Product Identification and Traceability verification procedures;
- Review of the Product Identification and Traceability validation schedule;
- Review of Product Identification and Traceability validation procedures;
- Review of Product Identification and Traceability training procedures;
- Retraining in Product Identification and Traceability;
- Review of management review activities to include Product Identification and Traceability as an agenda item;
- Initiation of product hold procedures where safety or quality may be compromised;
- Segregation and hold of unidentified or incorrectly identified product until its status is confirmed;
- Review of product identification and labelling controls where products are found to be unlabelled or incorrectly labelled;
- Review of batch or lot coding where codes are illegible, incorrect or cannot be linked to ingredients;
- Initiation of a product recall or product recall procedures where investigations show that there is a substantial safety and/or quality risk to the released product;
- Contacting stakeholders including customers regarding any confirmed or potential Product Identification and Traceability concerns involving their product.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Corrective Action requirements in relation to their items.

You may wish to visit the Corrective Action and Preventative Action section of haccp.com for examples of best practice applications for this food safety and quality system element.

Product Identification and Traceability Corrective Action and Preventative Action Key Points

- The implementation of Corrective Action and Preventative Action provides confidence that your FS&Q Program is effectively implemented and that FS&Q criteria are being met;
- Where deviations or variations are observed, Corrective Action and Preventative Actions must be facilitated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Corrective Action and Preventative Action of Product Identification and Traceability must be facilitated as per relevant documented Policies, Procedures and Work Instructions;
- Records of Corrective Action and Preventative Action for Product Identification and Traceability must be maintained per relevant documented Policies, Procedures and Work Instructions;
- Proper application of Corrective Action and Preventative Action for your Product Identification and Traceability program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- Poor application of Corrective Action and Preventative Action for your Product Identification and Traceability program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Verification

To review and confirm documented monitoring and corrective actions against documented parameters.

Verify

Verification: The act of reviewing, inspecting, testing, checking, auditing, or otherwise establishing and documenting whether items, processes, services, or documents conform to specified requirements.

Verification is the detailed review of all food safety and quality system elements to confirm that they are effectively developed, documented, implemented, monitored, and reviewed. All food safety and quality system elements, including documented policies, procedures, training, HACCP plans, and their operational applications must be verified on an ongoing scheduled basis. The verification process commonly includes a defined schedule for which verification activities are required, how often they are conducted, who is responsible, and detailed documented procedures for each nominated verification activity.

The general goal of an established verification process is to ensure any systemic non-conformance issues are identified and rectified within an appropriate time frame. When non-conformance issues are identified through the verification process, Corrective Actions and Preventative Actions should be implemented to ensure they do not impact the effectiveness of the food safety and quality system.

The following examples of verification activities may apply to Product Identification and Traceability:

- Review of the Product Identification and Traceability policy;
- Review of Product Identification and Traceability development procedures;
- Review of Product Identification and Traceability implementation procedures and work instructions;
- Review of Product Identification and Traceability monitoring procedures;
- Review of Product Identification and Traceability monitoring records;
- Review of product identification and labelling records;
- Review of labelling and coding legibility and indelibility checks;
- Mock recall and traceability exercises, including reconciliation of quantities (mass balance);
- Review of Product Identification and Traceability corrective and preventative action procedures;
- Review of the Product Identification and Traceability verification schedule;
- Review of Product Identification and Traceability verification procedures;
- Review of the Product Identification and Traceability validation schedule;
- Review of Product Identification and Traceability validation procedures;
- Review of Product Identification and Traceability training procedures;
- Review of Product Identification and Traceability performance since the last review and historically;

- Analytical testing of product or process to ensure the effectiveness of Product Identification and Traceability;
- Inclusion of Product Identification and Traceability as an agenda item within the Management Review Process.

Verification that the policy works should be done in two parts:

- Physical verification: visual checks that products and processes are used and identified as outlined in the policy regularly, for example, weekly or monthly; and
- Regular review of the policy to ensure that the practices are still current.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Verification requirements in relation to their items.

You may wish to visit the Verification Activities section of haccp.com for examples of best practice applications for this food safety and quality system element.

Product Identification and Traceability Verification Key Points

- Your verification program provides evidence that your FS&Q Controls have worked;
- Product Identification and Traceability programs must be verified to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The verification of Product Identification and Traceability must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated verification records for Product Identification and Traceability must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly verified Product Identification and Traceability program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly verified Product Identification and Traceability program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Validation

To confirm the documented monitoring or procedural limits.

Validate

Validation: The process of gathering evidence to provide a scientific basis for the documented act of demonstrating that a procedure, process, and activity will consistently lead to the expected results. It often includes the qualification of systems and equipment.

Validation is the provision of evidence to support the limits of control or acceptability for food safety or quality parameters nominated within systemic elements. Limits of control or acceptability are commonly included within documented food safety and quality systems elements such as procedures, HACCP plans, and specifications.

Common sources of validation include regulatory and legislative standards, finished product specifications and customer requirements, industry codes of practice and guidelines, verified and validated research, historical product and process control outcomes, and analytical testing.

The general goal of an established validation process is to ensure any systemic non-conformance issues are identified and rectified within an appropriate time frame. When non-conformance issues are identified through the validation process, corrective actions and preventative actions should be implemented to ensure they do not impact the effectiveness of the food safety and quality system.

Validation activities are commonly defined within the verification schedules and procedures of established food safety and quality management systems.

The following examples may apply to validation of the limits of control or acceptability for Product Identification and Traceability:

- Confirmation of nominated food safety and food quality control limits for Product Identification and Traceability. These limits may apply to regulatory, industry, customer, or finished product specifications;

- Confirmation through documented traceability exercises that product can be traced back to raw material suppliers and forward to customers within the time required by regulatory, industry, and customer requirements;
- Confirmation that quantities can be reconciled between raw materials received, product produced, and product dispatched (mass balance);
- Confirmation that product labelling and coding remain legible and indelible for the shelf life of the product; and
- Confirmation of analytical testing methods being used to confirm the effectiveness of Product Identification and Traceability and ensure the accuracy of outcomes.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Validation requirements in relation to their items.

You may wish to visit the Validation Activities section of haccp.com for examples of best practice applications for this food safety and quality system element.

Product Identification and Traceability Validation Key Points

- Your validation program provides evidence that your FS&Q Controls will work;
- Product Identification and Traceability programs must be validated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- The validation of Product Identification and Traceability must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Nominated validation records and supporting documentation for Product Identification and Traceability must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- A properly validated Product Identification and Traceability program will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- A poorly validated Product Identification and Traceability program will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.

Training, Competency and Resources

Skills, knowledge and competency requirements to facilitate development, documentation, implementation, monitoring, corrective action, verification and validation of every Food Safety and Quality System Element.

Skills and Knowledge

Skills and Knowledge: Skills and knowledge are attributes of human interactions commonly linked to competency within any specified job-related task.

Training and competency requirements for Product Identification and Traceability must be ongoing, including regularly scheduled reviews to ensure the effectiveness of training and competency outcomes.

Team members who have defined responsibilities regarding Product Identification and Traceability should have knowledge including:

- Basic Product Identification and Traceability requirements;
- Positive outcomes of Product Identification and Traceability;
- Negative outcomes of a lack of Product Identification and Traceability;
- Current Product Identification and Traceability procedures, methods, and techniques;
- General operational, corporate, and social awareness regarding Product Identification and Traceability;
- Regulatory, industry, and customer requirements regarding Product Identification and Traceability.

Team members who have defined responsibilities regarding Product Identification and Traceability should have skills including:

- Competency regarding basic Product Identification and Traceability;
- Effective application of current Product Identification and Traceability procedures, methods, and techniques;

- The basic development, documentation, and implementation of HACCP and Prerequisite Programs within the food industry sector.

Team members who have defined responsibilities regarding Product Identification and Traceability should have access to resources including:

- Product Identification and Traceability training;
- Product Identification and Traceability associations and events;
- Regulatory standards, industry and customer information and updates regarding Product Identification and Traceability;
- Incidents within the food industry sector regarding Product Identification and Traceability;
- Commitment to Product Identification and Traceability by senior management;
- Suitably qualified food industry professionals with verified experience in Product Identification and Traceability;
- Effective communication systems including email, internet, and phone through which Product Identification and Traceability information can be sent and received within suitable timeframes.

If your food business supplies foodstuffs manufactured to a customer's specifications, it is important to consider any specific Product Identification and Traceability Training, Competency, and Resources requirements in relation to their items.

You may wish to visit the Training, Competency, and Resources section of haccp.com for examples of best practice applications for this food safety and quality system element.

Product Identification and Traceability Training, Skills, and Knowledge Key Points

- Your Training, Skills, and Knowledge program ensures all participating personnel, visitors, and contractors have the required skills and knowledge to effectively facilitate the requirements of your FS&Q Program;
- Training, Skills and Knowledge programs for Product Identification and Traceability must be facilitated to meet relevant Regulatory, Industry, and Customer standards and requirements;
- Training, Skills and Knowledge programs for Product Identification and Traceability must be facilitated as per relevant documented Policies, Procedures, and Work Instructions;
- Training, Skills, and Knowledge records for Product Identification and Traceability must be maintained as per relevant documented Policies, Procedures, and Work Instructions;
- Properly applied Training, Skills, and Knowledge programs for Product Identification and Traceability will provide a strong framework for your business to maintain compliance with relevant Regulatory, Industry, and Customer standards and requirements;
- Poorly applied Training, Skills, and Knowledge programs for Product Identification and Traceability will not fully support your business and may contribute to significant non-compliance against Regulatory, Industry, and Customer standards and requirements.



haccp.com

haccp.com was created to support food businesses and food industry professionals in achieving and maintaining the stringent requirements of food industry compliance.

Explore everything at haccp.com »

Questions? **Contact us** · haccp.com

