

HACCP <i>Europa.com</i>	QUALITY SYSTEMS MANUAL	<i>Issue: 1</i>	<i>Ref No:</i>
		<i>Issued by:</i>	
	Traceability System Management	<i>Approved by:</i>	
		<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 1 of 5</i>	

SCOPE: This procedure applies to employees who implement and maintain traceability system.

PURPOSE: To identify and trace product lots and follow this through all raw materials (including primary and any other relevant packaging materials and processing aids), all stages of processing and the distribution of the finished product to the customer in a timely manner.

RESPONSIBILITY: It is the responsibility of the management to ensure that the following procedures are adhered to and understood by all relevant personnel and the personnel follow State or local health department requirements.

DEFINITIONS:

Traceability is the ability to trace the history, application or location of that which is under consideration” Whole-chain food traceability is comprised of both “tracking” and “tracing”.

“Tracking” is the ability to follow the path of a traceable item through the supply chain as it moves between parties.

“Tracing” is the ability to identify the origin, attributes, or history of a particular traceable item located within the supply chain by reference to records held.

For true whole-chain traceability, product must be uniquely identified and recorded at each stage of its possession or transformation and these identifiers must be linked if they are to be of value in both traceability and day-to-day operations.

INSTRUCTIONS:

1. Effective traceability requires standardizing the information that needs to be recorded through each step of the food production and distribution chain.

HACCP Europa.com	QUALITY SYSTEMS MANUAL	<i>Issue: 1</i>	<i>Ref No:</i>
		<i>Issued by:</i>	
	Traceability System Management	<i>Approved by:</i>	
		<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 2 of 5</i>	

2. To ensure continuity in the flow of traceability information, each partner must pass on information about the identified lot or product group to the next partner in the chain.
3. It is imperative that the links between the lots and the logistical units (resulting from a product transformation) are recorded. Within a company, the control of all these links and accurate recordkeeping make it possible to connect what has been received with what has been produced and/or shipped.
4. Implementing traceability system the following steps must be conducted:
 - Create a traceability project team within the organization.
 - Conduct a Gap Analysis on existing traceability practices.
 - Conduct a Business Case Analysis to quantify Return On Investment (ROI) resulting from enhanced traceability.
 - Develop a strategic plan for enhancing traceability.
 - Develop a migration path for incremental adoption of recommendations contained in this document.
5. Suppliers or distribution centers should mark cases with human-readable data including supplier name, product description and lot number. In the pilot studies, participants had proprietary codes for each of these elements; without human-readable labeling, there is no easy way to cross-reference this information.
6. Add the Lot Number to fixed-weight consumer packs containing a supplier ID. For consumer packs, addition of the lot number would improve traceability.
7. Shipment Identifier should augment or replace a buyer's purchase order number in recall communications, as Shipment Identifier is defined to be unique. With the possible use of backorders, multiple products, multiple receiving locations, and multiple receiving dates on one purchase order. Purchase Order numbers cannot be guaranteed unique to a shipment.
8. Ship Date, when known, should always accompany Shipment Identifier. It serves to further specify the transaction containing recalled product. This would speed recalls by more precisely identifying the transaction containing compromised product. This is especially valuable for locations not yet equipped to work with pallet labels such as SSCC or serial numbers.
9. Product lot or serial numbers should always be identified as such, rather than using other nomenclature (e.g., "Pallet Tags") which can lead to confusion.
10. Supplier lot number should always be recorded, even when a new lot number is assigned in the next operation. In such cases, the supplier's lot number should be linked to any new lot number created.

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		<i>Issued by:</i>	
	Traceability System Management	<i>Approved by:</i>	
		<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 3 of 5</i>	

11. Encode Supplier lot number and lot number in internal code.
12. Use human-readable supplier name, product description, and lot number.
13. During the selection, production process link the internal lot to the internal pallet number (or to the store location identifier).
14. Add the lot number to fixed-weight consumer packs containing a supplier ID (e.g. bagged lettuce).
15. Suppliers should mark cases with human readable data including supplier name, product description and lot number.
16. Mandatory Data Elements: Required for Traceability
 - Sender Identifier
 - Lot Number
 - Product Description
 - Product Identifier
 - Quantity
 - Unit of Measure
 - Shipment Identifier
 - Ship From Location Identifier
 - Ship Date
 - Ship To Location Identifier
 - Receiver Identifier
 - Receipt Date
17. Optional Data Elements: For Enhanced Traceability
 - Best Before Date
 - Contact Information
 - Country of Origin (Province/State)
 - Logistics Provider Identifier
 - Pack Date
 - Receiver Name
 - Sender Name
 - Shipping Container Serial Number
 - Vehicle Identifier
18. System must identify raw materials including primary and any other relevant, packaging and processing aids, intermediate/semi-processed products, part-used

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	Traceability System Management	<i>Approved by:</i>	
		<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 4 of 5</i>	

materials, finished products and materials pending, investigation, shall be adequate to ensure traceability.

19. System must ensure traceability can be determined from raw material to finished product and vice versa and include quantity check/mass balance.

Test the Traceability System

Testing the traceability system on a regular basis will:

- Demonstrate that the system does or does not work
- Highlight the gaps in the system which would make the company vulnerable and open to potential prosecution allowing the system to be improved where required
- Demonstrate how quickly the required information can be collated and thereby corrective action taken such as materials being isolated and quarantined.
- Ensure that the system works from either end of the supply chain, ie from specific raw ingredient to the customer's supply chain, or from delivery to the customer's premises to the trace back to the supplier of the raw materials.
- Acts as a training exercise for personnel to ensure clear roles and responsibilities are undertaken in the event of a real withdrawal situation.

Conducting the Traceability Test

1. It should be determined how often and how the traceability system shall be checked, it may be checked, in part, possibly targeting a particular process, on a regular basis, say weekly or tested as 'a whole' less frequently. It may be incorporated within a test of the product recall system. However, it must be ensured that the traceability system is adequately tested in its entirety no less than once every 12 months and comprehensive records kept of this test.
2. To carry out a traceability check, select a specific batch of product - this may be by physically selecting a product at random from a customer's store or from the distribution warehouse or by selection of product from production records. Follow the production backwards from delivery to the customer's warehouse to the receipt of the raw materials collating all the documentation relevant to that product.
3. The traceability test should also be completed 'forwards', selecting a random raw material and its use followed from receipt from the supplier to use in finished products.

<i>HACCP</i> Europa.com	QUALITY SYSTEMS MANUAL	<i>Issue: 1</i>	<i>Ref No:</i>
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		<i>Issue date:</i>	
		<i>Approval date:</i>	
		<i>Page: 5 of 5</i>	

Action To be Taken Following a Traceability Test

1. A management review should take place to analyse where the system worked well, and where it failed.
2. Results of the traceability test shall be brought to the attention of the personnel responsible for any activity which under performed. Corrective actions and timescales for their implementation shall be agreed. It shall be ensured that corrective actions are followed up and confirmed as adequately completed.
3. The requirement of the BRC Standards for a traceability test is to challenge and validate the operation of the system - show that it works effectively and efficiently, ensure staff are adequately trained in its operation and identifies that corrective actions have been taken to correct errors and continually improve the system.

MONITORING:

1. The traceability system will be audited accordingly to internal audits schedule.
2. Management ensure that appropriate staff is assigned for conducting the audit.

CORRECTIVE ACTION:

1. Any deviations and non-conformances recorded during the traceability audit must be reported.
2. Existing gaps in the system must be corrected and traceability system must be reviewed by traceability team.

VERIFICATION AND RECORD KEEPING:

1. The manager will verify traceability system during traceability audit.
2. The audits will be conducted accordingly to internal audit schedule.

RECORDS APPLIED TO THIS PROCEDURE:

- Traceability system audit record.

DOCUMENTATION RETENTION:

The records applied to this procedure are to be kept on file for a minimum of 3 years.