Guidance for Developing Good Operating Practice Procedures: Identification and Traceability

August 2011

Amendment 1

Background

Food identification requirements are described in chapter 1 of the Australia New Zealand Food Standards Code (FSC).

1   Purpose / Scope

Write up your purpose and scope for Identification and Traceability.

Example: To ensure all materials and products are:

–   appropriately identified at receipt, and during processing, storage and sale; and

–   traceable both forward (to your immediate customers) and backwards (to your suppliers).

See also:

–   Incoming Materials;

–   Product Information (Labelling and Composition);

–   Storage and Transport.

These topics have been covered individually in other guidance documents.

2   Authorities and Responsibilities

Write up who is responsible for Identification and Traceability. Think about managers, supervisors and other people as may be necessary.

Example: The business operator has the overall responsibility for identification and traceability. Specific staff responsibilities are assigned as follows: [include specific details against a job title or role].

3 Control Measures

Write up how you ensure identification and traceability of materials and products is achieved.

Consider at least the following points:

3.1 Receipt and Storage

- how you ensure you can identify all materials received, e.g.:

  – delivery dockets/invoices;

  – product labels;

  – date marking; and

  – lot marking / batch numbers (as appropriate).

- how you ensure traceability of raw materials after they enter the premises, e.g.:

  – bar-coding;

  – labels, tags, markers, colour coding etc.; and

  – colour-coded bins (e.g. for food allergens used as an ingredient in food and for ingredients containing allergens).

3.2 Process

- how identification is maintained during processing (e.g. transfer of labels, tags, markers).

- how traceability is maintained when the materials are used (e.g. keep records of lots used and the products they were used for; maintain batch records/sheets showing which materials when into a batch).

3.3 Dispatch

- how you ensure forward traceability to support any product recalls as may be necessary, e.g.:

  – ensuring appropriate inventory control and dispatch records are maintained; and

–   ensuring the necessary information is included on the food label, or on accompanying documentation, in order to identify the food in question (refer to the Australia New Zealand Food Standards Code for the mandatory Food Identification Requirements).

4   Monitoring

Write up how you check your Identification and Traceability requirements are being met.

Consider the following checks:

*   inspect incoming materials, storage areas, process control, labelling, etc. (Refer to Incoming Materials and Process Control procedures)

*   conducting mock recalls to check your traceability is working.

5   Corrective Action

Write up how you correct any problems that monitoring identifies, or that you otherwise become aware of.

Include how you cover the following:

1.   Defining the extent of the problem (i.e. what has happened, why and when it happened, and how much and which (if any) product has been affected);

2.   Restoring control (i.e. the action needed immediately to stop more product becoming affected and to fix problem);

3.   Handling affected product (e.g. preventing any unsafe product from being released - see the separate guidance for Complaints, Non-conforming Product, Corrective Action and Recall); and

4.   Prevent re-occurrence (e.g. using information gained from the problem to identify better ways to do things; develop better procedures; improving the checking systems; provide better staff training, etc.).

6   Documentation and Record Keeping

Determine what records you need to keep for this procedure. These will help you to introduce and maintain consistent good practices, and to demonstrate to your verifier (auditor) that you are sufficiently controlling those factors that can impact on the safety and suitability of the food.

Assess any records you already have, and introduce any additional records you need for the monitoring and corrective action activities you specify in your procedure. When monitoring, you may have an option to either:

–   record every check; or

–   indicate that checks have regularly been carried out (e.g. throughout a week) and only record the results of a specific check where something went wrong. In these instances, always make a record of what you did to put things right (the corrective action).

Keep blank record forms handy for staff to use and let people know where they are. Keep completed record forms together where they can be found easily for your regular internal verification checks.

For your general programme requirements refer to the guidance document on the appropriate risk-based programme or plan which can be found on the Food Safety website.