

## UNIT III

### **Traceability and product recall**

Traceability and product recall addresses the requirements for identifying and tracing all raw materials, ingredients, and products, including all semi-finished, finished, reworked, or recycled products, and the procedures to be followed for conducting a recall of a food that has reached the marketplace, should this become necessary. In the food industry, it is quite common for foods to be recalled from the marketplace. This occurs in spite of the enforcement of and compliance with regulatory requirements of GMPs in food establishments and the use of government mandated HACCP system requirements in some food industry sectors.

A recall of a food can take place whenever it has been determined that there is an unacceptable health hazard associated with the food that has reached the consumer marketplace, or some aspect of the food violates the laws or regulations that govern the product. A recall can be initiated without any evidence that the health of a consumer of the food has been affected. A food can contain an unacceptable health hazard as a result of deficiencies during the manufacture of the product. For some types of foods, contamination can take place during storage, distribution, handling, and retailing.

The accurate recorded identification of the usage and movement of raw materials, ingredients, and products, including recycled or reworked products, at all stages of processing, handling, storage, and distribution of a food, are essential for the traceability of a food.

#### ***1. Identification***

All raw materials, ingredients, and products, including intermediate, semi-finished, pre-finished, finished, recycled, reworked, pre-packaged, and packaged products should be identified and the identification recorded. The identification of a food to be shipped from a food plant should cover the identity of the food (e.g., product name, recipe, product code) and the time or period of production (e.g., production date, day code, lot number, batch number). In addition, all packaged foods must conform to the applicable ingredient identification requirements of government labeling regulations. All raw materials, ingredients, processing aids, packaging materials, and the processing and storage equipment used for the production of a particular food, should be identified and the identification recorded to ensure that if it becomes necessary, the history of the food can be traced.

The locations of storage and addresses of places to which a food has been distributed for use by customers and for sale to consumers should be identified in the appropriate shipping and distribution records, which should be kept for a period that exceeds the life of the food in the marketplace.

#### ***2. Traceability***

There should be a program for traceability for every food that is manufactured and shipped from a food plant. This program should cover forward traceability (for use of raw materials and ingredients) and backward traceability (for finished products). The traceability program should be based on the use of the relevant identification records and should cover all foods that are in inventory

in all warehouses, foods that have been shipped from a food plant and its warehouses, foods delivered to customers, and foods that have been sold to consumers.

### ***3. Recall procedure***

A written recall procedure should be developed to ensure that if a food which is known to present an actual or potential unacceptable health risk to the consumer has entered the food distribution and retail chain, the food can be retrieved quickly and completely. The recall procedure must meet the requirements or guidelines for recall issued by government regulatory agencies, it should describe a precise and well-coordinated set of activities that can be executed very quickly and efficiently. The recall procedure should be tested periodically to determine its effectiveness and should be based on identification records and the traceability program. The procedure should include, as a minimum, the following information:

- The people, including their alternates if they cannot be contacted, who will be responsible for conducting the recall, and the people who should be available to provide information, along with the specific responsibilities of each individual
- The details for contacting the appropriate senior management or other personnel with assigned responsibilities, including contact information for these individuals during periods outside of regular working hours
- The details for contacting and communicating with the appropriate government regulatory agency, with all customers who would have received the food being recalled, and with the news media
- The person designated to be the liaison with officials from a government regulatory agency
- The records and other information that should be retrieved during a food recall. The required information includes (a) all identification information related to the food, including its common and brand names, item number, lot number, batch number, best before or expiration date, product code, UPC code, packaging materials and packaging format, packaging container size, (b) a list of all locations, with addresses, telephone numbers and contact information, to which the food has been shipped, including all warehouses for its storage, all customers, including distributors, retailers, food service institutions and restaurants, and (c) identification of all raw materials, ingredients, processing aids, packaging materials, and processing and storage equipment used for the manufacture of the food, and the processing conditions and storage conditions used for the food
- The procedure to be followed to determine which production lots or batches of the food are affected to ensure that the scope of the recall targets all the affected food, but only the affected food.

A food company should have a permanent crisis-management team that has responsibility for food recall, as well as other critical food safety concerns (e.g., food tampering, and other critical safety concerns, environmental safety, employee safety).