



Traceability

FSKN 14

GFSI Basic Level

- The organisation shall establish a system which enables the identification of product lots and their relation to batches of raw materials, primary and consumer unit packaging materials, processing and distribution records.
- Records shall include:
 - identification of any incoming product or ingredient,
 - complete records of batches of in-process or final product
 - record of purchaser and delivery destination for all product supplied.

Criteria

- Reasons for traceability
- Legal requirements
- Customer requirements
- Meeting traceability requirements

Reasons for Traceability

- to meet legislative and customer requirements
- to provide information within a business to assist in process control and management e.g. stock control, efficiency of raw material usage
- to assist a business when a problem arises e.g. customer complaint, incident management
- to assist in the support of any claims or provide information to customers especially where claims cannot be supported by analysis e.g. organic ingredient, providence of raw material

Legal Requirements

- Regulation EC 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
- Article 18 – Traceability
 - Definition: ‘means 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’

Legal Requirements

- Traceability shall be established at all stages of production, processing and distribution
- Food business operators shall be able to identify any person from whom they have been supplied with a food and shall have in place systems and procedures which will allow information to be made available to competent authorities



Legal Requirements

- food business operators shall have in place **systems and procedures to identify other businesses in which their products have been supplied** which will allow information to be made available to competent authorities
- food which is placed on the market shall be **adequately labelled or identified to facilitate traceability** through relevant documentation or information



EU Legislation Summary

- ‘one step back’, ‘one step forward’ approach
- identity from whom and to whom the product is supplied
- requirement for ‘internal traceability’ is unclear; there is inference that is required
- traceability of packaging covered by other EU Regulations
- internal traceability is stated as being a benefit and should be encouraged but not a requirement

Customers Requirements

- Differs from legal requirements
- All major retailers and manufacturers require 'internal' traceability
- Internal traceability is a system to record the identification of ingredients, raw materials and products in a premises at all times.
- Traceability requirements will include all direct contact packaging
- Some customers have specific requirements



Meeting Traceability Requirements

- Clearly label all raw materials, ingredients, packaging, semi processed product, and rework
- Maintain concise and accurate records at batch mixing stages
- Intake identity shall dictate information flow



Meeting Traceability Requirements

- Finished product shall have clear and concise lot marking or coding
- Special care for identity preserved products to meet customer requirements
- Data shall be readily available at all times



QUESTIONS?



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