

Quality & Food Safety



Traceability – more than just a lot code

Traceability is defined as the ability to trace a product or components of a product through all steps in the process from receiving through to shipping/sale. This process is often referred to as one-up, one-back. Putting a lot or date code on a product is not enough. Traceability is more than just a code; it is the ability to find a product, or components of a product, if a quality or safety issue was to occur and a recall or withdrawal of product from the marketplace was warranted.

Does the company record reworked or reclaimed product?

Are sales within the company or direct sales to consumers recorded?

Are samples taken by inspectors or the quality assurance/product development team recorded?

Is waste tracked?

Is the product that is taken home by owners or given to friends, family or employees recorded?

If a supplier contacted the company to say there was an issue with something they supplied, would there be records of when and where it was used?

If the answer to one or more of these questions is “No”, there is a strong possibility that not all affected products would be found in the event of a product recall or withdrawal.

Keeping Track – simple is best when it comes to documenting

When documenting products and incoming components remember to keep it simple where possible. Invoices, bills of lading (BOL), production records/books already in use and working well for the facility may be able to be adapted. Consider adding rework, waste, samples, incoming lot codes and amounts to existing documents. Suppliers may be willing to add amounts and lot codes to the BOL if requested. The receiver will only need to double check that the codes and amounts are correct. Remember, if it is made to be convenient then the information you require is more likely to be recorded. Be sure to keep files organized and retain them for a minimum of at least the shelf life of the product plus one year, in case they are needed for a product complaint or recall. Computerized record keeping can be an advantage as well, making it quick and easy to retrieve the needed information. There are many options out there; choose one that works well for the company and its products.

Recalls - have a plan that works with the team

No one wants a recall to occur and most companies will never experience one, but as in the

case of most emergencies, it is best practice to have a plan in place in case a quality or safety issue arises. Recalls tend not to happen at convenient times. They can happen any time - on Friday afternoon, on a weekend, when key people are away on vacation - so it's best to be prepared. Write a detailed, step by step recall plan to help walk the recall team through the process. The recall team should be trained, and include back-up personnel selected for key roles. Make sure to have an up-to-date contact list for team members as well as customers. In the event of a recall remember to notify customers, CFIA, and any certification bodies that will need to know that a product needs to be recalled. Be prepared with a media notice and response. Have a designated spokesperson to speak for the company while the recall team is tracking the product and dealing with customers and inspectors. This is key to successful recovery of the business after a recall. Small businesses without a lot of resources could enlist and train trusted friends and family or call for outside assistance. No business owner or quality professional should go through a recall unsupported.

Mock Recalls – practice, practice, practice

After a recall plan is in place it is important to practice the plan so the team is prepared and confident that product can be recovered. At a minimum a practice recall should be carried out once per year. This is done internally; do not call the customers. Instead, verify that contact names and numbers are correct. The goal should be 100% recovery in two hours or less. If it takes longer or 100% of the product cannot be located, there are gaps in the traceability system that need to be closed. Once the gaps have been closed test the plan again. Test incoming material traceability (one-back) as well, since a recall could be initiated because of something that was caused by a supplier of ingredients, packaging or other components.

Resources

For more information on CFIA recall process:
<http://www.inspection.gc.ca/about-the-cfia/newsroom/food-safety-system/food-recalls/eng/1332206599275/1332207914673>

<http://www.inspection.gc.ca/food/safe-food-production-systems/food-recall-and-emergency-response/manufacturers-guide/eng/1376326890597/1376327095576>

To keep up to date on recalls (FB, Twitter, email, online):

<http://www.inspection.gc.ca/about-the-cfia/newsroom/food-recall-warnings/eng/1299076382077/1299076493846>

There's an app for that:

<http://healthycanadians.gc.ca/connect-connectez/mobile-eng.php> (screenshot below)



Canada

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