BROCHURE
PRINCIPLES OF TRACEABILITY

TRACEABILITY
COLEAD makes this brochure available to ACP (African, Caribbean and Pacific) foodstuff producers and exporters. The illustrated procedures on the following pages are intended for producers and processors wishing to comply with good production and packaging practices.

It sets out the key recommendations on the traceability of products and operations.

The procedures set out in this brochure form part of the series of recommendations for complying with basic food-safety management principles. They relate to traceability, an essential part of quality management and a key tool for managing health crises.

Brochures on other topics are also available on the COLEAD website (www.colead.link).

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INTRODUCTION

Traceability is a process that consists primarily in creating the conditions to enable retracing the different stages and places in the life of a product from its creation to its shipping or destruction. It is a statutory obligation imposed for food safety purposes so that defective product batches can be identified for withdrawal or recall.

Traceability is also essential for other reasons: transparency vis-à-vis the inspection bodies, private voluntary standards and specifications, relationship of trust between the client and consumer, etc.

All companies must be capable, firstly, of finding back their products and then of identifying the root of the non-conformity problem. Traceability must therefore make it possible to track the history of the operations undertaken at each stage in the process. A traceability system makes it possible to identify, for any product batch:

- all stages of its manufacture;
- the provenance of its component elements and their suppliers;
- the locations where the product and its components have been stored;
- the checks and tests performed on the product and its components;
- the equipment used in its manufacture or handling;
- the direct clients who have purchased the product.

However, operators are free to choose the organisation and machinery put in place for traceability. These will depend on:

- the characteristics of the company (size, product type, etc.);
- the objectives of the distribution chain (reduce interceptions at the border, improve consumer confidence, etc.);
- requests by clients (to know the product provenance, to identify the ingredients, etc.).

The traceability process is based on:

- identification of the partners in the supply chain;
- identification of products;
- identification of logistical units (pallets, containers, etc.);
- information flows and data interchanges.

Traceability does not guarantee product safety. It cannot, per se, be used for decision taking nor for assessment of the results obtained. Traceability is a tool that provides results and information to the operator or the authority to assist with decision making.
LIST OF KEY MESSAGES AND PROCEDURES FOR MANAGING PRODUCT TRACEABILITY

BEING ABLE TO TRACE A PRODUCT BATCH

1. Be able to retrace a product batch at any moment, in space and in time, from the land parcel to distribution.
2. Know the operations performed on the product batch, from production to distribution.
3. Identify all parties involved in the value chain, both those upstream (suppliers) and those downstream (clients, distributors).

PUTTING IN PLACE A TRACEABILITY SYSTEM

1. Identify, distinguish and link product batches entering and leaving the company, with the help of identification numbers.
2. Register the operations performed on a product batch and ensure a link with the identification number for the batch concerned.
3. Retain the data recorded throughout the production, processing and distribution chains for a minimum of 5 years.

TRACING A DEFECTIVE BATCH

1. Be capable of rapidly withdrawing or recalling a defective batch sent to a client or already marketed.
2. Be able to reduce any losses arising from a defective product by withdrawing or recalling just the batch(s) concerned.
3. Be able to find the element (environment, resource, staff, equipment or raw material) that is the cause of the defect in order to improve the process by introducing corrective measures.
AVOIDING GAPS AND FAILED TRACEABILITY

1. Record all the information required to locate and keep a historical record for a batch. Any inadequate or failed traceability will result in a withdrawal or recall that is more extensive than necessary.

2. Ensure that there is a link between the batch and the records at each stage in the process. The absence of a link makes it impossible to tie a batch to a series of operations (production, processing or distribution).

3. Traceability makes it possible to allocate criminal liability, the costs incurred, etc., to the correct party.

4. Be able to satisfy the statutory requirements with regard to product labelling (batch number, product origin and characteristics, use-by date, etc.).
BEING ABLE TO TRACE A PRODUCT BATCH

LOCATE A BATCH AT ANY MOMENT, IN TIME AND SPACE (TRACKING)

— Who are the suppliers?
— When did it arrive in the company?
— Where was it when it was checked?
— Who are the consignees for the batch?
— When will the batch be shipped?

It must be possible to respond to these questions at all times so that a batch can be found at any stage in the process.

KNOW THE MANUFACTURING HISTORY OF A BATCH, FROM ITS PRODUCTION TO ITS DISTRIBUTION (TRACING)

WHO ARE THE SUPPLIERS?

— What operations have been conducted on the field (sowing date, treatments, harvesting date, etc.) to produce the batch?
— What collection and processing operations has the batch undergone?
— What are the conditions for conservation and storage of the batch?

It must be possible at all times to answer these questions to guarantee being able to retrace the history of a batch at any stage in the process.
BEING ABLE TO TRACE A PRODUCT BATCH

ENSURE THE REQUISITE LINKS BETWEEN THE BATCH AND THE DIFFERENT PARTIES INVOLVED IN THE LIFE OF THE PRODUCT

— Guarantee the continuity of the links, from the producer down to the processor and distributor (traceability in descending order).

— Guarantee the ability to reconstitute the links from the client/distributor back to the processor and from the processor to the producer (traceability in ascending order).

Traceability must be possible in both directions: in descending order so as to organise withdrawal or recall; ascending order in order to identify the origin of any non-conformity and react with corrective measures.
PUTTING IN PLACE A TRACEABILITY SYSTEM

DEFINE A PRODUCT BATCH AND IDENTIFY IT WITH A NUMBER

— Identify it by a number.

— A series of units produced under the same conditions and that therefore have comparable characteristics may constitute a batch.

— Incoming products (raw materials, inputs) must bear a batch number.

— Outgoing products must be identified by a batch number clearly displayed on the packaging.

The definition of the batch, the numbering and the marking system must be adapted to the company’s needs and business.

RECORD THE OPERATIONS PERFORMED ON A BATCH

— The data recorded are linked to the batch number (land parcel number, crate label, consignment slip, entry number, storage slip, etc.).

— The documents to be filled in may be pre-printed sheets with tick boxes.

The documents must be simple, indestructible, unforgeable and provide rapid data access without errors. The use of a computer is not mandatory.

RETAIN THE DATA ENTERED

— The recording of the data begins at the field and continues through processing to distribution.

— The records must be kept for five years.

The information collected are useful for identifying any problem stage and improving the safety process.
TRACING A DEFECTIVE BATCH

BEING ABLE TO LOCATE A DEFECTIVE BATCH AT ANY TIME MAKES IT POSSIBLE TO UNDERTAKE

— A withdrawal if the batch has not already been distributed to consumers.
— A recall if the batch has been sold to consumers.

Traceability makes it possible to recover the batch(es) before too many consumers are placed at risk. This reduces the financial losses and the loss of confidence on the part of clients in the company and in the supervisory authority.

TRACK A DEFECTIVE BATCH THANKS TO ITS IDENTIFICATION NUMBER AND THE DATA RECORDED

— Organise withdrawal or recall more rapidly with the minimum effort.
— Only withdraw or recall those batches that are non-compliant.

This limits the cost of the withdrawal, recall and destruction of non-compliant batches.

BE ABLE TO IDENTIFY THE STAGE IN THE PROCESS WHERE THE SAFETY PROBLEM OCCURRED

— Identify the problem stage from among the operations as a whole.
— Identify the origin of the problem and the responsibilities involved.
— Put in place corrective measures to prevent any reoccurrence of a similar event.

Link each product batch to a series of records in order to gain an understanding of the origin of the problem so that suitable and effective corrective measures can be adopted. Identifying the responsibilities makes it possible to conduct targeted staff awareness campaigns and training.
AVOIDING INADEQUATE AND FAILED TRACEABILITY

**RECORD SUFFICIENT INFORMATION TO BE ABLE TO DEFINE AND IDENTIFY EACH BATCH**

- If there is insufficient data (absence or loss), this is referred to as inadequate traceability.
- A lack of information may mean that more batches than necessary may be withdrawn or recalled, as a precaution.

Insufficient and lost data makes it impossible to organise the withdrawal or recall of non-compliant products and may expose consumers to avoidable risk.

**CREATE A LINK BETWEEN THE RECORDS AND THE BATCH IDENTIFICATION NUMBERS**

- When the records cannot be linked to batches, this results in failed traceability.
- In the case of failed traceability, criminal liability, the costs incurred, etc., lie with the operator who is incapable of identifying its suppliers or unable to inform its clients.

A traceability failure generally occurs between two stages in the process, in particular when the responsibilities of a number of parties are involved.

**COMPLY WITH THE PRODUCT LABEL MARKING REQUIREMENTS**

- In addition to the batch number, the label must display certain mandatory information.
- The records guarantee compliance with the statutory product labelling requirements.

The information contained on the label varies depending on the geographical area in which it is marketed (nature, origin and composition of the product, allergens, commercial features, shelf-life, etc.)
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