



## Product Identification and Traceability

**Traceability is defined as “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.”<sup>1</sup> The primary reason for having a functional traceability system in place is to ensure safe food and to aid in the removal of unsafe food from the market place. A logical and systematic form of product identification is integral in such a system.**

Under the ‘Code of Practice for Dairy Food Safety 2002’ (CoP) all manufacturers of dairy products must have a program in place to ensure identification and traceability at all stages of manufacture and storage for raw materials through to finished product.<sup>2</sup>

Such a program must allow trace back and trace forward of all dairy product and ingredients. This system must be validated, and verified, to ensure it is effective. For example, in the case of a potential food safety incident, systems are in place to identify where suspect product has been delivered (i.e. trace forward) and that the particular batch involved can be easily identified by a distinguishing code so it can be recalled. In the case of trace back, records of processing history, individual batch ingredient details, or supplier vendor declarations may be used to help identify the cause of the failure. Once a cause has been identified, corrective actions can then be put in place to prevent the likelihood of a repeat occurrence.

It is also a requirement under the CoP that all manufacturers have a Hazard Analysis Critical Control Point (HACCP)-based Food Safety Program in place.<sup>2</sup> It is implicit in all such programs that the concept of traceability is addressed. Documentation must provide proof of compliance to the program. Dated and signed production and related records provide this retrospective proof of compliance (i.e. verification). Specific identification records must be kept, such as:

- ingredient details;
- batch number;
- production code;
- quantity produced;

- equipment used; and
- other relevant details.

Records demonstrating compliance to the CoP must also be retained for at least 3 years.



The CoP also mandates that a validated product recall plan is in place. A product recall is defined as “action taken to remove from sale, distribution and consumption foods which may pose a food safety hazard to consumers.”<sup>3</sup> In contrast to product recalls there are product withdrawals. Product withdrawals are undertaken for quality reasons or similar reasons that do not pose a risk to public health and safety, or as a precautionary measure before an official recall. For further details on product recalls and withdrawals refer to the Food Standards Australia New Zealand ‘Food Industry Recall Protocol.’

Other benefits to manufacturers in having an effective identification and traceability system in place include minimisation of costs involved in conducting recalls or withdrawals, and improved stock and distribution control.

### References

1. European Commission (2002) ‘Regulation (EC) No. 178/2002.’
2. Dairy Food Safety Victoria (2002) ‘Code of Practice for Dairy Food Safety.’ Available at: [www.dairysafe.vic.gov.au/pdf/DFSV\\_CodeOfPractice2002.pdf](http://www.dairysafe.vic.gov.au/pdf/DFSV_CodeOfPractice2002.pdf)
3. Food Standards Australia New Zealand (2002) ‘Food Industry Recall Protocol – A

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guide to writing a food recall plan and  
conducting a food recall.' Available at:  
[www.foodstandards.gov.au/  
srcfiles/FIRP\\_5E  
d\\_Sept02.pdf](http://www.foodstandards.gov.au/srcfiles/FIRP_5Ed_Sept02.pdf)

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### Further information

Other Dairy Food Safety Notes are available at  
[www.dairysafe.vic.gov.au](http://www.dairysafe.vic.gov.au)

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