

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.'⁽¹⁾ 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 both the Victorian *Code of Practice for Dairy Food Safety 2002* and Food Standards Australia New Zealand's national Food Standards Code requirements in Standard 4.2.4, all manufacturers of dairy products in Victoria must have a food safety program in place to ensure identification and traceability at all stages of manufacture and storage for raw materials through to finished product.^(2,3)

The food safety program must allow trace back to the supplier of raw materials and trace forward to the next recipient of the finished goods. This system must be validated, and verified, to ensure it is effective. For example, in the case of a potential food safety incident, systems must be 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.

All manufacturers must have a DFSV-approved Hazard Analysis Critical Control Point (HACCP)-based food safety program in place. It is implicit in all such programs that the concept of traceability is addressed. Documentation must provide proof of compliance with the food safety program. Dated and signed production and related records provide this retrospective proof of compliance (i.e. verification). Specific identification records must be kept, including:

- ingredient details
- batch number
- production code
- quantity produced
- equipment used
- other relevant details.

Records demonstrating compliance with the food safety program must also be retained for at least three years.

A product's 'use-by' or 'best-before' date is often used as a means of identifying each batch of product. Including details such as the time of packaging, process line or other relevant information can also be useful additional identifiers for tracing products.

A manufacturer's traceability system must also ensure that a validated product recall plan is in place. A product recall is defined as 'action taken to remove from distribution, sale and consumption, foods which may pose a food safety risk to consumers.'⁽⁴⁾

In addition to product recalls, product withdrawals can take place. 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*.

Commercial web-based systems are also available which help facilitate the exchange of information between the manufacturer, suppliers, distributors, retailers and relevant government agencies in recall situations.



Example of a coding device used to identify dairy products.

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

Key points to consider

- All manufacturers of dairy products are required to have a DFSV-approved HACCP-based food safety program in place.
- The food safety program must include a system to ensure identification and traceability at all stages of manufacture to allow trace back to the supplier of raw materials and trace forward to the recipient of the finished products.
- This system must be validated, and verified by DFSV, to ensure it is effective.
- A validated product recall plan is also required.
- Documentation (records) must provide proof of compliance with the program.

References

1. European Commission, Regulation (EC) No. 178/2002.
2. Dairy Food Safety Victoria, *Code of Practice for Dairy Food Safety*, DFSV, Melbourne, 2002.
3. Food Standards Australia New Zealand, *Standard 4.2.4 - Primary Production and Processing Standard for Dairy Products*, Commonwealth of Australia, Canberra, 2012.
4. Food Standards Australia New Zealand, *Food Industry Recall Protocol – A guide to writing a food recall plan and conducting a food recall*, 6th edn, FSANZ, 2008.

Further information

Further food safety technical information is available at www.dairysafe.vic.gov.au

Or contact Dairy Food Safety Victoria on (03) 9810 5900 or info@dairysafe.vic.gov.au

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