Importance of Traceability

Food safety laws, regulations and standards such as ISO 22000 and SQF make it necessary for companies that manufacture food to have visibility throughout their processes and ensure safety throughout.

Rapid response to a non-conformance or recall event is critical in protecting public health and safety and protecting the financial longevity and brand image of an organization. The ability to follow a material or product through all stages of the supply and distribution chain is vital to a consumer’s safety. Not only is it prudent for a company to have traceability systems in place, it is a regulatory requirement for food companies to be able to track and trace product at least one step back and one step forward.

Companies need to have systems in place to trace raw materials to the finished products. In order to do so companies must be able to keep records and document materials used from all suppliers, record the movement of these supplies through production and record and document all materials and products supplied to others inside and outside the organization. Additionally companies should have a preventative and integrated quality management systems in place that is able to link test results to these records.

It may seem basic, but is it important that all material received that moves through the production process through finished product be labeled properly in order to be able to account for and identify the product at any point in the process. The use of bar codes, RFID (radio frequency identification) or other tracking media facilitates tracking items from farm to fork and can help in pinpointing a material or product as a possible source of contamination when a recall is required.

There are several technology enablers that best-in-class companies are more likely to adopt that play a critical role in leveraging traceability throughout the extended supply chain. Some of these are labeling solutions, supply chain visibility, complaint handling, dashboards, quality and regulatory compliance management and automated GMP compliance tracking. These technologies and systems give real time data that allow an organization to respond quickly to an adverse event that could lead to a product recall.

Today’s technology solutions allow companies to manage their processes and products to ensure food safety.

Food Safety and Traceability

In September and October of 2011 the Aberdeen Group conducted interviews of 104 food and beverage companies concerning food safety and traceability. Two key factors were of upmost concern to the companies surveyed, the need to ensure product quality and customer satisfaction. In addition, other top priorities included the need to comply with government regulatory requirements and the need to reduce the number and severity of quality, non-compliance, and recall events.

Best-in-class companies responded that the key strategies that they have implemented to address these concerns include building in compliance and traceability into their production processes; creating or improving the visibility and control of quality across the product life cycle including innovation, manufacturing and supply chain; increasing the responsiveness to non-conformances; and improving the quality performance and compliance of key suppliers.

Another key finding of this research was the measurable impact that the Food Safety Modernization Act (FSMA) has on manufacturers. While Aberdeen’s research showed that the strongest impact of FSMA is on increased documentation and record storage, the research also showed manufacturers are more diligent with regard to supplier certification and inspections, internal auditing and inspections, and investment in document management and workflow systems to keep up with the requirements of FSMA.

In order to achieve these results, best-in-class companies have implemented business processes that incorporate compliance with food safety and traceability management systems such as ISO 22000 or SQF. There is commitment at the executive level for compliance, traceability, and improving quality processes across the organization. In addition, all levels of the organization have visibility and defined responsibilities in the case of a non-conformance or recall event. Internal audits and recall simulations are performed regularly in order to address any gaps and take immediate corrective action to improve performance. Also traceability data is automatically collected across the operation and mobility tools are used to collect and display critical traceability data.

With all that is encompassed in meeting the pressures of food safety, traceability and government regulatory requirements, many companies have recognized the need to improve their risk management capabilities and have adopted a formal risk management and assessment process that continually monitors and evaluates their operations.

As the business and regulatory landscape continue to evolve and change, companies will need to be able to adapt quickly. Best-in-class companies will continue to anticipate these needs and implement processes to improve their operations to continually ensure food safety and traceability.

Sources: Aberdeen Research , Food Safety and Traceability 2011, FDA, ISO

By: Carol Kozlowski, CPIM, Manager of Crisis Management, RQA, Inc.
### United States Department of Agriculture Recalls (www.usda.gov)

<table>
<thead>
<tr>
<th>Product:</th>
<th>Hazard:</th>
<th>Possible Health Risk:</th>
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<tbody>
<tr>
<td>Oven Roasted Chicken Breast</td>
<td>Listeria monocytogenes</td>
<td>Listeria monocytogenes can cause serious and sometimes fatal infections in young children, frail or elderly people, and others with weakened immune systems. To date, no illnesses related to this recall have been reported. The source of the contamination is unknown and is the result of a random sampling event by the USDA which revealed the presence of the bacteria. Both recalled products originated in Mexico and were distributed to retail stores. The recalled products were distributed in CA, OR, WA, TX and Canada between Dec. 3-5. Consumers who have purchased the affected products should discard or return any unused product to the store for a refund. Consumers and media with questions should contact the company directly.</td>
</tr>
<tr>
<td>Frozen Stuffed Pasta Products</td>
<td>No Federal Inspection</td>
<td>A Bellmawr, NJ establishment is recalling approximately 161,000 pounds of frozen stuffed pasta products that were produced without the benefit of federal inspection. The frozen 25-ounce poly bags of stuffed pasta were produced between Dec. 1, 2010 and Dec. 1, 2011 at the company’s Louisiana facility. It was then distributed to 15 states/territories including KS, MO, OK, AR, LA, MS, TN, KY, IN, IL, HI, FL, CA, US Virgin Islands, and Guam. Those who have purchased these products should return the affected products to the place of purchase for a refund. Consumers with further questions should contact the company for more details.</td>
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### Consumer Product Safety Commission Recalls (www.cpsc.gov)

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<td>Toaster</td>
<td>Fire</td>
<td>A Glen Allen, VA importer is voluntarily recalling about 14,000 chromed steel exterior 2-slice toasters. When the toasters are first plugged into the outlets, the heating element can be energized although the toaster lifter is in the up or off position, which can pose a fire hazard if the toaster is near flammable items. These toasters were manufactured in China and sold at mass merchandisers and department, grocery and home center stores nationwide from Aug. 2011 through Nov. 2011. The company has received 5 reports of toasters being energized when first plugged into an outlet. There have been no reports of injuries or property damage. Consumers should immediately stop using the recalled toasters and contact the firm to receive instructions on how to obtain a free replacement. For additional information, consumers are asked to contact the company or visit the company’s website.</td>
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<tr>
<td>Women's Dress Shoes</td>
<td>Fall</td>
<td>A St. Louis, MO distributor and retailer in cooperation with the CPSC is recalling approximately 6,100 pairs (and 700 pairs in Canada) of women's dress shoes. The recall involves women's faux patent leather dress shoes with a 3-in heel, open toes and a decorative faux patent leather bow across the front. The heels of the shoes can lean to either side, posing a fall hazard when worn by consumers. The shoes were manufactured in China and sold in all women's sizes in gray, nude, scarlet and black colors at the retailer nationwide from July 2011 through November 2011. The firm has received one report from a consumer in Canada who received a minor leg injury when she fell while wearing the shoes. Consumers should stop wearing the recalled products and return them for a full refund. For more details, consumers should contact the company directly.</td>
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### Food and Drug Administration Recalls (www.fda.gov)

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<td>Jalapeno and Serrano Chili Peppers</td>
<td>Salmonella</td>
<td>A Buena Park, CA firm has issued a recall of 18,500 pounds of Jalapeno and Serrano chili peppers because they may be contaminated with salmonella. Salmonella is an organism that can cause serious and sometimes fatal infections in young children, frail or elderly people, and others with weakened immune systems. To date, no illnesses related to this recall have been reported. The source of the contamination is unknown and is the result of a random sampling event by the USDA which revealed the presence of the bacteria. Both recalled products originated in Mexico and were distributed to retail stores. The recalled products were distributed in CA, OR, WA, TX and Canada between Dec. 3-5. Serrano peppers were distributed in WA on Dec. 8. Consumers who have purchased the affected products should discard or return any unused product to the store for a refund. Consumers and media with questions should contact the company directly.</td>
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<tr>
<td>Dry Dog Food</td>
<td>High Aflatoxin Levels</td>
<td>A Elk River, MN firm has announced a voluntarily recall of two regional brands of dry dog food because high levels of aflatoxin were detected that were above the acceptable limit. Aflatoxin is a naturally occurring substance resulting from the mold, Aspergillus. Exposure to high levels of aflatoxin for extended periods of time can lead to reduced liver function. So far, no illnesses have been reported to date. If your dog has eaten the affected products, contact a veterinarian immediately. The recalled dog food products were manufactured between Dec. 1, 2010 and Dec. 1, 2011 at the company’s Louisiana facility. It was then distributed to 15 states/territories including KS, MO, OK, AR, LA, MS, TN, KY, IN, IL, HI, FL, CA, US Virgin Islands, and Guam. Those who have purchased these products should return the affected products to the place of purchase for a refund. Consumers with further questions should contact the company for more details.</td>
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For more information about these topics and more, please contact:

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Crisis Control is a newsletter jointly published by RQA, Inc. & Catlin Group.

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