Product Identification

Definition

The process by which the site identifies and traces product.

Applicable Code Requirements

1. 2.6.1

Review Glossary Terms

1. Allergens
2. Rework

Implementation & Audit Guidance

What does it mean?

2.6.1.1 A product identification plan is to be developed by the site. It must address all inputs during all stages of receipt, production, and storage as well as outputs (i.e., finished product) during storage and dispatch. Finished product is to be labeled according to customer specification and regulatory requirement.

2.6.1.2 Due to the significant number of global recalls due to mislabeling of product, the site must develop and implement procedures to monitor product start-up, changeover, and label and packaging changeovers to minimize and hopefully eliminate the incidence of mislabeling and incorrect packaging. Changeovers are to be inspected and approved by a trained, authorized person. Any inconsistencies identified are to be investigated and resolved.

Sites will want to retain records created in the process of development of the product identification program and its verification. Records generated during monitoring of product changeover and label reconciliation are to be maintained.

Why is it in the Code & why is it important?

This is a mandatory clause.

A primary cause of product recalls around the world, accurate labeling and product identification is a critical part of the site's SQF System.

The product identification program serves to facilitate many other programs such as the product trace, product withdrawal and recall, allergen management, food fraud, product release, and product rework programs. It is enabled by the site's document control and records programs.

The site is required to review the effectiveness of its product trace program at least annually. This serves among other purposes to identify opportunities for improvement in the product identification program. A root cause analysis of any issues related to expediency and efficiency of the product trace program will determine if product identification is the cause or contributory cause.

Several control points exist to manage the labeling process, notably at product start-up, changeover, and label and packaging changeovers. It is at these steps that mislabeling can occur. The site's process for managing these changeovers will go far in preventing and reducing the potential for costly recalls. Personnel responsible for changeovers will need proper training in

managing the switch from one product, ingredient, label, or packaging to another and be able to identify when the process has gone awry.

Inconsistencies in the label change over process are to be investigated and resolved using the site's corrective and preventative action and root cause analysis programs. If the process for product identification is changed, the site will need to ensure key personnel such as line employees, label room supervisors, and receiving and shipping personnel are made aware of the changes and their competency verified as per 2.9.2.3.

Monitoring records, investigation records, resolutions, program updates and training records are to be retained as per the site's record and document control programs.

See RIO Chart on following page.

RIO Road to Audits (Records, Interviews, and Observations)

Records	Interviews	Observations
The following are examples of records and/or documents to assist in the implementation and review of this topic: ▪ Product identification program ▪ CAPA from product recalls and withdrawals or annual review of product trace program ▪ Product, packaging and/or ingredient changeover reconciliation ▪ Training records for authorized person responsible for changeovers ▪ Training records for line employees ▪ Training records for those responsible for labeling of inputs and finished product ▪ Training records for those responsible for label and packaging creation and approval ▪ Finished product specifications ▪ Label and packaging approval signoffs	The following are examples of people to interview to assist in the implementation and review of this topic: ▪ Operation personnel involved in receiving, production, packaging, storage, and shipping. ▪ Purchasing The following are examples of questions to ask to assist in the implementation and review of this topic: ▪ Who is responsible for the site's product identification program and how is the identification of allergens and inputs identified and retained through production? ▪ Describe how label and packaging is reconciled during a changeover. ▪ How are employees trained to inform the authorized person of a changeover? ▪ Describe what took place when product was recalled or withdrawn due to incorrect labeling or packaging. ▪ How does the site keep apprised of labeling requirements in the country (ies) of production and sale?	The following are examples of observations to assist in the implementation and review of this topic: ▪ Label or packaging changeover ▪ Label and packaging storage area ▪ Receiving practices

See Additional References on following page.

Additional References

- Graphic Products, Product Identification: https://www.graphicproducts.com/articles/product-identification/
- PMA, Product Identification: https://www.pma.com/content/articles/2016/08/product-identification
- FDA, Guidance for Industry Food Labeling Guide: https://www.fda.gov/regulatory-information/search-fda-guidance-documents/guidance-industry-food-labeling-guide
- The National Agricultural Law Center, Food Labeling – An Overview: https://nationalaglawcenter.org/overview/food-labeling/
- FAO Organization of the United Nations, Food Labelling: http://www.fao.org/ag/humannutrition/foodlabel/en/
- IFT, Glossary of Food Traceability Terms: https://www.ift.org/global-food-traceability-center/education-and-training/glossary-of-terms
- IFT, Harmonizing Regulations and Best Practices: https://www.ift.org/news-and-publications/food-technology-magazine/issues/2014/october/features/traceability