Guidelines and routines for tracking, recall and withdrawal

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In its framework, STAND has defined guidelines, recommendations and best practices for how products should be marketed in the distribution chain, and how information on this should be exchanged between the parties.

Central to this is the consideration of the consumer and his expectation for safe food.

The guidelines for tracking, recall and withdrawal do not define food quality requirements, but describe what procedures and processes the industry has established to mitigate any unwanted effects should an incident or crisis occur in a product.

Best practices

The guidelines describe best practices in this area.
By following STAND's framework, the guidelines will be achievable for all parties involved.

Some important prerequisites for best practice.

- Routines and processes must be simple, predictable and intuitive
- Products and deliveries / load carriers must be labeled in a unified, standardized and correct way so that they can be traced through the value chain.
- Product information must be registered in the Tradesolution EPD
- Detailed tracking information must be exchanged digitally between the parties and follow the products through the value chain.
- Action must be taken quickly when an incident or crisis occurs

By ensuring that a total industry complies with STAND's framework, consumers' demands and expectations for safe food are fully met.

Objective of the guidelines

The guidelines are aimed at "Contribute to meet consumers' expectations for safe products".

Target Audience:

- Anyone who may or will be involved in any recall or withdrawal
- Everyone involved in the production or labeling of products and packaging covered by the guidelines

Products / areas to which the guidelines apply:

- Recommended for food and non-food products, except pharmaceuticals
- Other inputs, plants, animals or foodstuffs
- Materials and articles that are intended to come into contact with, or may affect, inputs or foodstuffs.

Medicines are exempt from the guidelines. Here we refer to separate regulations, not described here.

Certain types of food may be subject to additional regulatory requirements beyond what is described here. An example is the EU's new tobacco directive (EU 2014/40) which make the requirements for traceability of tobacco products more stringent, but is not described here.

Routines covered by the guidelines

Legislative anchoring of the guidelines

The guidelines are among others based on Norwegian or European regulations on food safety and traceability:

- Product Liability Act of 23 December 1988
- Act on food production and food safety, etc. of 19.12.2003 Matloven (Food Law)
- Regulations on internal control to comply with IK-mat forskriften (IK Food Law)
- EU Food Law (Regulation EC 178/2002)
- Directive 94/62 / EC on packaging and packaging waste

Each party has an obligation to familiarize themselves with the regulations that apply to the products your business sells or are involved in.

The legislation does not impose requirements on how tracking should be performed, and what systems in which tracking information should be recorded. Manual systems may be sufficient as long as the requirements for tracking and tracking information are met.

Routines

The guidelines cover two procedures

- Requirements for and how to design contingency routines
- Implementing actions should an incident or crisis occur

Prepare crisis procedures

This is included:

- Prepare a Risk Analysis
- Prepare a Contingency Plan
- Requirements for product tracking
- Tracking information and labeling requirements

Prepare a Risk Analysis

At the heart of the legislation is the duty of each company to carry out a risk analysis of the health risks the products represent and how the company will relate to this in terms of traceability.

The purpose of the analysis is to reduce / prevent risk through

- Withdrawal of products from the market, or
- Efficient notification or recall of products from consumer

This assumes that the parties are aware of the risks the products may pose and have a preparedness that ensures that they react quickly, correctly and effectively in unwanted incidents. A Risk Analysis should therefore be performed on new products based on an intended relevant incident, so that it can be implemented as quickly as possible should a real incident occur for the product.

The risk analysis consists of three elements that both the government and industry should work on in an equal way:

- Risk Assessment
- Risk Management
- Risk Communication

See more about risk analysis hereDesign and content of a Risk Analysis

Prepare a Contingency Plan

If unwanted incidents or crises occur, it is important to be well prepared.

Possible scenarios for what might arise should be thought through and how this should be handled.

A Contingency Plan must be prepared that will allow you to cope with the situation quickly, correctly and effectively. The Contingency Plan must be accurate and accessible to all involved at all times.

The Contingency Plan includes:

- To designate a crisis team, responsible for traceability, recall and withdrawal.
- Internal and external contact lists to quickly reach everyone involved or affected by any incident or crisis
- Training and exercises in the company's routines and instructions on how to handle incidents or crises. Exercises should be as realistic as possible and carried out with the closest business partner in the value chain
- This must be easily accessible and may consist of, for example
    - a brief overview of crisis teams with their roles and responsibilities
    - the company's internal guidelines for handling incidents / crises
    - contact lists
    - other relevant documentation that is important to have access to should an incident or crisis occur

See more about the Contingency Plan here Design and contents of a Contingency Plan.

Product tracking requirements

The legislation requires that each company must have systems to document which products are purchased from each supplier and which customer has purchased the company's finished products.

This also includes raw materials and other input that are covered by the legislation.

There is no requirement in the legislation for which type of systems to be used for this.

Businesses can practice more comprehensive tracking systems than the minimum regulatory requirements require, but this is either based on self-imposed requirements or agreements with, and orders from the contracting parties.

Tracking means being able to follow the physical flow of goods. This is often referred to as chain traceability, and assumes that all parties meet the requirements and follow the guidelines for tracking.

Tracking takes into account the legal requirements for all parties to be able to trace their products one step forward and one step back in the value chain.

Tracking one step forward:

This means to the address the products are delivered to.

An invoice system containing information about item number / item name, customer number / customer name and invoice date is sufficient to be able to trace one step forward in the value chain.

If the company is using batch/lot numbers for their products, this should be included in the invoice, despatch advice and the like, or linked directly to the company's own systems.

Tracking one step backward:

This means the address from which the products are delivered.

The company must keep a log of received products describing which products were purchased from whom and in which quantitiy, and date.

If the addresses for where products are delivered from or delivered to are not in accordance with the legal ownership of the products and the invoice process, this should be agreed separately between the parties.

Requirements for tracking information and labeling

The main purpose of the tracking information is to lay the groundwork for effective blocking, withdrawal or recall of products.

Central tracking information is:

- GTIN (Global Trade Item Number) – Unique identification of products
- GLN (Global Location Number) – Unique identification of trading parties, pick-up points, delivery points etc.
- SSCC (Serial Shipping Container Code) – Unique identification of load carriers / pallets
- Batch / lot number – A unique batch or lot number defined by supplier / manufacturer
- Shelf life – Either *Best Before date* or *Last Consumption Date*

It is a requirement that the products are labeled to enable tracking.

The marking must be affixed to the product packaging and legible.

The following applies to finished goods traded between supplier and distributor / retailer:

Information to be marked:

- The name of the supplier
- Product name/description
- Product number identified with a GTIN.
- Best before date / last day of consumption date, if required
- Batch / Lot number, if required

Load carrier (for example pallet) shall be marked with SSCC.

The sender must in his system have an overview of which recipient the product was sent to, and also the recipient must have an overview of which sender the product was received from. Both sender and recipient must be identified with GLN.

Sender shall in his system register:

- Quantity sent
- Shipping Date
- Reception date (if known)

Recipient shall in his system register:

- Quantity received
- Shipping date (if known)
- Reception Date

The following applies to raw materials and other inputs:

- GTIN should be used for identification of inputs / raw material, if available
- GLN should be used for identification of sender / suppliers, if available

More about tracking information and how the product can be tracked in the value chain is described here[Recommended traceability methods in the value chain.]

Actions to be made in case of an incident or crisis

Alarm / Notification

An incident can occur in all steps of the value chain, at the consumer, retailer, distributor or at the supplier itself. It is important that the supplier is notified as soon as possible.

Notification of an incident shall be given to one alert point at each operator. The alert point should be agreed in advance and always be staffed / available.

The industry has decided that for products registered in the Tradesolution EPD base, Tradesolution ReCall portal should be used for blocking, recall or withdrawal. Access is available at *epd@tradesolution.no*

For products not registered in the Tradesolution EPD base, a *Notification schema for recall, withdrawal or blocking of a product* may be used **provided that this has been agreed between the supplier and the distributor/wholesaler**. Notification schema can be downloaded from *Downloads*.

Required information to follow an alarm / alert

To identify the scope of the alarm / alert, the product's GTIN / EPD, best before date, batch / Lot number and SSCC on affected pallets must always be stated. This applies regardless of whether the product is registered in the Tradesolution EPD base or not.

By using the portal, the supplier gets / is secured

- Easier, faster and more efficient registration, as well as quality assurance of the necessary product information
- Ensure that necessary information is distributed quickly and efficiently to all relevant recipients
- Simplifying the dialogue between the parties
- All dialogue and information exchange is done in the portal and can be logged and stored.

Here you can see an animation that shows how a recall can be done in practice, using the ReCall portal

The ReCall portal can also be used in situations where you want to withdraw products with quality defects.

Distributors have built their own systems and routines for alerting crisis situations and blocking the products at their distribution warehouses and retailers. This is not part of the ReCall portal.

The following routine applies when registering an incident or crisis

1. Register a new case
2. Determine severity and health hazards
3. Notify affected parties / recipients
4. Register distribution and what to do with the product
5. Register tracking information for affected batches / lots
6. Describe further actions to be taken, with press releases and other additional information
7. Closing the case

The practical implementation of the routine is described here Routine when registering an incident or crisis, in the Tradesolution ReCall portal.

Conclusion

Through the guidelines, the industry contributes to satisfying consumers' demands and expectations for safe products, provided that an overall industry complies with the guidelines.

Should an incident or crisis occur, there are routines and tools that, in a simple, fast and secure way, limit incidental damage.

An accurate and limited recall or withdrawal will be possible.

This reduces costs for all parties in the value chain and minimizes potential reputational loss.