Tracking

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Tracking

Tracking includes the following sub processes:

- Establish routines for traceability, recall and withdrawal
- Recall / withdrawal of a product

Areas affected by, and subject to guidelines for STAND are:

- Background to the guidelines, what is the goal, and who is the target audience
- Laws and regulations underlying the guidelines and how they are legally rooted
- What requirements exist for traceability, traceability information and labelling, and the product areas for which the guidelines apply
- How can internal routines for recall / withdrawal be established
- What actions can be taken if an unwanted event or crisis should occur and how a product can be traced in the value chain

The guidelines are to be understood as recommendations that actors must bilaterally agree on whether to be followed or not.

Guidelines and routines for tracking, recall and withdrawal

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.

Recall / withdraw a product

Recall / withdraw a product

Areas affected by, and subject to guidelines from STAND are:

- Implementation of actions when an incident occurs, using the notification schema for recall, withdrawal or blocking of a product
- Alternative ways to track and trace an item in the value chain

Implementation of actions when an event occurs

If an event occurs, the supplier of the product must carry out a risk analysis as quickly as possible.

Risk Analysis
The EU directive on general product safety and food safety / traceability requires manufacturers to take precautions to avoid risk through

- withdrawal of products from the market, or
- effective notification or recall of consumer products.

This assumes that companies are familiar with the risks the products may have and have preparedness to ensure that they act quickly, correctly and efficiently in case of adverse events.
Risk assessment may also contain items other than food safety. It is especially the risk that products with quality errors will be released to the market, which can have major financial consequences and harm the reputation of the company.
The risk analysis always takes the starting point of an intentional or real event, something unforeseen as occurring and which implies a potential risk.
The degree of risk must be determined (probability x consequence).
Procedures, contingency routines etc. must be prepared to ensure that the event is handled in a fast, correct and efficient manner. This also includes communication measures internally within the company, towards the other part of the value chain, towards authorities and consumers.
The risk analysis consists of three elements that both government and industry should work in a similar way:

1. Risk assessment
2. Risk management (withdrawal / recall)
3. Risk communication

1. Risk assessment
The elements of a risk assessment are: Product, type of risk, probability and consequences.

For products that the company distributes and sells in the value chain, the following must be considered:

- Type of risk
    - consumer health and safety
    - corporate reputation
    - economic aspects.
- The likelihood of an event occurring in most cases is a purely subjective assessment and can for example be graded
    1. = Low (rare occurrence)
    2. = Medium (occasional)
    3. = High (often occurring)
- The consequence, especially the health, is also a subjective assessment that can be graded in the same way as the probability
    1. = Low
    2. = Medium
    3. = High

Compilation and treatment of the above factors gives an assessment of the risk that the company must consider.

The supplier must do a worse-case risk assessment where the supplier considers risk of the product being used in a different way from the purpose.

2. Risk management (withdrawal / recall)
Based on the risk assessment, it must be decided what actions should be done for the product.

Examples of actions:

a) Withdrawal
Withdrawal means removing the products from the value chain distributors / store. The purpose is to prevent products reaching the consumer.

Withdrawal does not imply any kind of notification to the consumer. However, in some cases where the product may have been sold to the consumer, still only a withdrawal in the distribution chain / shop will be carried out. It is therefore assumed that the product does not cause any health hazard and that it is a small quantity.

b) Recall
Recall is the procedure that is implemented when the product may have reached the consumer.

There is a possible high risk that the products may be hazardous to health.

It is crucial for the company that the recall is made known to the public.

According to the Food Law, the actors have a duty to issue a warning.

The company must consider possible alternatives with stakeholders, including authorities, based on regulations, procedures, contingency routines and the like. It must be clearly described how the products are to be handled and who is responsible for this.

Examples of handling:

- Distributor / Retailer disposes of the product on-site
- The product is destructed at an approved waste management facility
- The product is returned to the distributor and further to the supplier
- Consumers must dispose of, or return the product

The parties must clarify who is responsible, for example, the distributor must deliver products to the supplier or the supplier must retrieve products himself at the distributor / retailer.

The supplier must also consider whether it is necessary to inform the authorities of the incident. If the consumer is informed, it is important that the supplier has the capacity to handle any customer requests.

3. Risk Communication
Open and correct information must be communicated to customers (possibly suppliers), the press and authorities.

Distributors have constructed their own systems and routines for alerting crisis situations and blocking of the products against their distribution warehouses and retailers.

This ensures a consistent and effective handling of withdrawal, recall or blocking internally within the companies.

Alarm / Notification
In case of an emergency, notification of recall or withdrawal shall be given to a point of contact agreed by the parties in advance. At the distributors, the alert can be the distributor's quality department, asset protection department or distribution warehouse (to be agreed between supplier and customer). The point of contact should always be staffed.

Use of the RECALL portal / notification schema
In case of recall / withdrawal notification, Tradesolution's RECALL portal or Notification schema for recall, withdrawal or blocking of a product shall be used. Notification schema will be phased out over time, at a time decided by STAND.

Here is an animation of how the ReCall portal can be used in case of a recall:

The RECALL-portal / notification schema can also be used in situations that do not present a health risk, but where you want to recall products with a quality issue.

All written notification to distributors / distribution warehouses must be confirmed by oral conversation.

Distributors have constructed their own systems and routines for alerting crisis situations and blocking of the products against their distribution warehouses and retailers. It is recommended that the suppliers take a thorough look at these.

Information to authorities and the media
It is recommended that interested parties (supplier and customer) mutually inform each other before proceeding with information.

It is important that authorities and media are informed at the right time. What information that is required depends on the severity and extent of the event / crisis.

Additional Information
Additional information about the case may include:

- Copy of press releases
- Further information on risks or hazards when consumed
- Information about when the product is expected to be available again (reported fit for consumption) in case all products are withdrawn
- Where to find additional information
- A precise description of the handling of the product, both at the distributor and retailer

Closure of the case
It is important that the event / crisis is terminated when it is under control. The information that should be communicated is:

- The time when the product fit for consumption is available again
- Identification (characteristics) of a product fit for consumption
- Economic conditions (settlement, crediting)

In cases where the product is to be destroyed, this must be done at an approved disposal facility, and without danger of contamination.

Recommended traceability methods in the value chain

Traceability using pallet labelling and EDI Despatch Advice
The recommended traceability method involves labelling load carriers with GS1 labelling system combined with EDI Despatch Advice (Advance Shipping Notice(ASN)).

For products distributed through the retailer's distribution warehouses, the industry's unified guidelines for the identification and Distribution Units (DU) are based on GS1 standards.

To conduct traceability, each actor in the value chain must have a system that can store and process Distribution Units (DU) or logistic units with unique identifiers.

The importance of SSCC as the primary tracking key for deliveries
SSCC is the most important tracking key in the retail value chain. For each pallet identified and marked with SSCC, all products that are on the pallet are linked with full tracking information (GTIN, batch / lot and shelf life). This information is sent to the buyer in an EDI Despatch Advice.

A prerequisite for the tracking information to remain intact is that an SSCC is not reused.
Reusing a SSCC can result in a pallet being stopped at the Goods Reception by the recipient's IT system, anticipating that the pallet has been received earlier. The recipient must then issue a new SSCC for the pallet, mark it and link the contents of the pallet to the new SSCC.

Since the pallet now has a new SSCC, it can no longer be used as a mutual tracking key in the retail value chain. In case of an incident with a possible recall / withdrawal of products, this could be critical.

STAND has therefore decided the following:
"For trading in Norway, it is a requirement that SSCC shall not be reused until after a minimum of 6 years. This is rooted in the Norwegian Food Safety Law, requiering a minimum traceability of 5 years. This also includes products that are outside the scope of the Norwegian Food Safety Law".

Traceability at and from sender
Each packaging level (Consumer Units (CU), Stock Keeping Units (SKU), Distribution Units (DU)) has an assigned GTIN and must include a bar code on the label.

On Consumer Unit (CU), GTIN should preferably be labelled with the EAN-13 bar code symbol.

Stock Keeping Unit (SKU) on the Distribution Unit (DU) must be labelled with an approved bar code symbology and linked to the Distribution Unit's (DU) unique identification.

Each pallet must be labelled with one GS1-128 bar code pallet label. The label contains a unique identifier (SSCC) which enables a link between the Stock Keeping Unit (SKU) on the pallet and the batch / lot number stored in the sender's IT systems.

If the pallet is split or changed (for example, to one Mixed pallet or Promotional Unit, it shall be identified with a new GS1-128 label and SSCC. Mixed pallets are not labelled with product information.

The product information is attached to the pallet's SSCC by scanning each Stock Keeping Unit (SKU) when the Distribution Unit (DU) is being assembled.

Once the sender has created the connection between the Stock Keeping Unit (SKU and the Distribution Unit (DU) and secured this, the information can be used to make an EDI Despatch Advice.

The EDI Despatch Advice is then sent from the sender to the recipient of the products. The parties are identified with GLN. This provides a clear and secure identification of the parties and is central to traceability. The Despatch Advice contains all relevant product information (GTIN, batch / lot and shelf life) about the shipment, and that it ties it to each Distribution Unit (DU) using SSCC.

For shipment, the supplier scans all outgoing Distribution Units (DU) and thus has a unified link between the individual product, its associated batches and which customer receives the product. This also enables effective control of the sending of correct products to customers.

Sender sends EDI Despatch Advice to recipient at agreed time.

Traceability at receiver
When the products arrive at the recipient, each pallet will be scanned.

All Stock Keeping Units (SKU) and Distribution Unit (DU) information is received in the EDI Despatch Advice. Using the EDI Despatch Advice, the tracking information is taken care of and significantly simplifies the products receipt.

The link to the product information occurs when the recipient scans the SSCC on each Distribution Unit (DU). Here, the recipient connects information about the products (GTIN, batch and shelf life information, against the sender (GLN).

For a Standard pallet all relevant information can be scanned from the Distribution Unit (DU) labels. This ensures that correct products are received at the same time as traceability information can be linked to the individual supplier. This simplifies and ensures the sharing of proper traceability information.

Mixed pallets must be split into the warehouse, and through IT support ensure that accurate and statutory traceability information is safeguarded and connected correctly.