Integrated Farm Assurance

Guideline for Fruit and Vegetables

Annex II – Product Identification, Traceability, and Recall

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1 PRODUCT IDENTIFICATION

To conduct an effective trace-back, producers need to record essential product information, such as production site locations, inputs, production and harvest dates, contact details of suppliers and customers, lot identification, and batch numbers.

Records generated from product identification systems may be kept on paper or in digital form. Regardless of the system used, stored data must be clear and easily accessible if needed, such as during the pressure of a recall incident.

Separate production sites must be identified on a map and a system established for recording the production location. This site identification system should be used on all production and related records (including fertilizer and plant protection product applications, harvest records, etc.). This enables the recording of the history of inputs, production activities, involved workers, and products harvested at each production site.

Where a central packhouse assembles products from different producers, the respective producer information must be traceable on each final product. If this is not done, products from all producers involved in the central packing process may be affected in the event of a product recall.

2 TRACEABILITY

Traceability allows the product journey to be verified from the customer back to the production location and from production location forward to the customer. At minimum, each producer should be able to trace their product one step forward and one step back along the supply chain. Products presumed to cause illness in consumers are usually identified by health authorities. Once a pathogen and food source are identified and the distributors in the supply chain notified, it is important to be able to trace all products suspected of contamination or potential contamination, isolate them from the supply chain, and prevent further distribution by suppliers.

Producers also need to be able to trace the chain of custody one step forward in order to know where their product has been sent, in case they suspect that their product has become contaminated. Effective traceability can help reduce the number of people affected by a food safety incident. Therefore, a system to retrieve product and location identification records needs to be available to each producer.

3 RECALL

Whenever a product is identified as unsafe or potentially unsafe to consumers, a product recall may be initiated. Under IFA requirements, producers must have a documented recall plan in place and follow this recall plan in the event of a recall.

Speed is of the utmost importance in the event of a product recall, as consumer safety is typically at stake. Retailers require their suppliers to provide identification of all products affected by a recall within a defined period of time.

A product recall may be required in response to, e.g.:

- Notification by local authorities
- Customer complaints
- Internal reviewing of records (e.g., spray records show incorrect rate applied)
- Non-conforming products (e.g., test results indicate exceedance of acceptable chemical or microbial levels for products tested), or labelling errors on products
- Non-conformance to standards
- Malicious product contamination, i.e., intentionally tampering with products

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3.1 Mock recall

In addition to the development of a recall plan, producers shall conduct a mock recall at least annually. Such a mock recall shall consider incidents at producer level to test/verify the effectiveness of the recall system as well as the recall team's understanding of the recall procedure. Evidence shall be available to demonstrate that this verification step has been undertaken at the defined frequency.

The mock recall process must be supported by a current source of contact persons and include notification of the relevant customer if a recall needs to take place.

4 NOTIFICATION TO CUSTOMERS

Producers and suppliers shall notify their customers immediately if any microbiological result exceeds specification or if other incidents occur that may impact product safety, legality, quality, or integrity.

Examples of incidents that customers should be notified of can include, but are not limited to:

- Loss of valid certification (e.g., suspension or cancellation of certification, major audit non-conformances, audit failure, or unacceptable audit outcome)
- Adverse farming conditions, including biological, chemical, and/or physical risks (for example, gross contamination of irrigation water or adverse weather events)
- Other gross contamination events (such as mass ingress from livestock/birds)

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