

TRACEABILITY PROCEDURES BASED ON FDA AND CFIA REGULATIONS – AN UNDERSTANDING

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Record keeping is an integral part of HACCP, which offers product traceability and enables producers to recall products when a problem occurs.



Over the past two decades, world trade in seafood has shown a remarkable increase. Stagnation or decline of resources in the Northern seas, the emergence of new producing countries following the extension of Exclusive Economic Zones and the trend towards more natural and balanced diets in developed countries have contributed to this.

Consequently, the developing countries play a greater role by exporting their products to lucrative markets, characterised by strong demand and high purchasing power.

In 1999, world fish production was estimated at 125 million mt. About 80% of the total catch was directed for human consumption while the remaining 20% was reduced to fishmeal and fishoil.

Changes in consumer lifestyles in developed countries also mean that marketing requires standardised products because of the increasing importance of super-markets as compared to small fishmongers, and that there is increased demand for ready to eat products. This is also seen in the consumption of food products once considered to be a luxury, but is common in supermarkets today such as shrimp, smoked salmon, oysters and mussels.

Along with higher living standards and the growing awareness of the consumers in developed countries and in some of the developing countries, fish poisoning is not considered as an inevitable occurrence. Consumer associations have exerted pressure on their governments to tighten up sanitary regulations in production units to ensure that fish marketed are wholesome and safe to eat.

Consequently, many developed and developing countries around the world have adopted the Hazard Analysis Critical Control Point (HACCP) in their production system. The HACCP concept is based on seven principles of which the sixth one is on the record keeping system. The record keeping procedures enables producers to recall products when a problem occurs. This paper, based on the FDA definitions for recall procedures, will discuss different aspects of traceability for products processed in units observing HACCP system.

Traceability

Record keeping is often known as the glue that holds the HACCP system together, an essential step, without which it will be difficult to verify the working of the system. Records serve well in many ways. For example, when the management on a timely basis reviews the system, it can help spot trends in the process. In some cases, this can help to correct a problem before a critical limit is exceeded, which can in turn, save valuable time and resources. In addition to

the positive fact that the system is working, records also offer product traceability from the time it comes into our control until the time it leaves our control.

Recall procedures

Recall is an effective method of removing or correcting consumer products that are in violation of government laws. It is a voluntary action that takes place as manufacturers and distributors carry out their responsibilities to protect consumer health and well being from products that present risk of injury or gross deception or are otherwise defective. Recall is an alternative to health authorities' efforts to initiate court action for removing distributed products by setting both specific recall procedures for competent authorities to monitor and to access a firm's effort. An *ad-hoc* committee of the competent authority will conduct an evaluation of the health hazard in a product being recalled and whether any disease or injury has already occurred from the use of the product.

Requirements

All products must be coded in accordance with the relevant Fish Act. Following regulations, every carton and case in which fish (frozen and fresh form or pickled, spiced and marinated) are packed at an establishment, shall be legibly marked on one end in such a manner that the name of the establishment, the day, month and year of processing can be verified by an inspector. However in the case of canned products, every can of fish that is packed, for which a registration certificate has been issued, shall be embossed with a code identifying the establishment, the day, month and year of processing and also identify the product contained therein.

Shipping documentation –specifications

All fish processing companies must have in place a recall procedure that will ensure that product (s) put into the distribution system and later found to be not complying with the regulations, can be removed from the market in a quick and efficient manner. This requires the company to have an accurate and up-to-date recording system for all shipments. The fish processing company must have control of their products entering the distribution chain up to the first shipping destination. The information required in a shipping record area follows:

- Date of shipment
- Brief description of product
- Lot number
- Lot size
- Code marks
- Marks (if any)
- Carrier
- Consignee
- Destination

Recall strategy

Recall strategies will be developed by the competent authority (health authority in the case of requested recall) or by the firm (in case of a firm-initiated recall) taking into account the following factors:

Depth of recall: Depending upon the product's degree of hazard and the extent of distribution, the recall strategy shall specify the level in the distribution chain to which the recall is to be made (*e.g.* consumer, retail or wholesale level).

Public warning: The purpose of a public warning is to alert the public that the product being recalled presents a serious hazard to health. It is reserved for urgent situations where other means of preventing the use of the recalled product appear inadequate.

Effectiveness checks: The purpose of the effectiveness check is to verify that all persons who received, purchased or used the recalled product, at the recall depth specified by the strategy, have received notification about the recall and have taken appropriate action. Contacts may be by telephone, personal visits or letters.

If a firm decides to initiate a recall on its own, it should notify the appropriate competent regional authority immediately. The competent authority will review the information submitted, advise the firm of the assigned recall classification, recommend appropriate changes in the firm's strategy for the recall and advise the firm that its recall will be placed in the competent authority's report.

Recall communication: A recalling firm is responsible for promptly notifying each of its affected direct agents about their call. The format, content, and extent of recall communication should commensurate with the hazard of the product being recalled and the strategy developed for that recall.

A recall communication should be written in accordance with the following guidelines:

Be brief and concise

Identify clearly the product, size, lot number (s), code (s), or serial numbers and any other pertinent descriptive information to enable accurate and immediate identification of the product.

Explain the reason for the recall and the hazard involved

Provide a ready means for the recipient of the communication to report to the recalling firm whether it has any of the products, *e.g.* by sending a postage-paid, self-addressed postcard or by allowing the recipient to place a collect call to the recalling firm.

Recall status reports

The recalling firm is requested to submit periodic recall status reports to the appropriate competent authority to enable it to assess the progress of the recall.

Recall termination

A recall will be terminated when the competent authority determines that all reasonable efforts have been made to remove or correct the problem in accordance with the recall strategy. The appropriate office of the competent authority will issue written notification of a recall termination to the recalling firm. A recalling firm may request termination of its recall by submitting a written request to the competent authority.

General industry guidance

A recall can be disruptive to a firm's operation and business, but there are several steps a prudent firm can take in advance to minimise this disruptive effect. Notwithstanding similar specific requirements for certain products the Food and Drug Administration, provides the following guidelines for a firm's consideration:

- Prepare and maintain a current written contingency plan for use in initiating and affecting a recall in accordance with regulations.
- Use sufficient coding to make it possible for positive lot identification and to facilitate effective recall of all violative lots.
- Maintain such product distribution records as necessary to facilitate location of products that are being recalled. Such records should be maintained for a period of time that exceeds the shelf life and expected use of the product and is at least the length of time specified in other applicable regulations concerning record retention.