	SQF System – Edition 9	Golden Platter Foods, Inc.	Procedure No. 2.6.2
	Approved By: Scott Bennett Monica Quinonez	Product Trace	Version: 6
	Supersedes: V5	Date Approved: 11/19/2021	Page 1 of 5

Background: To ensure that all finished, graded, and packaged inventory product is prepared with lots of raw material that can be identified quickly in event of a recall or market withdrawal.

Purpose: Outline procedures for identification of raw material, packaging, and finished product to ensure identification in event of a recall or market withdrawal.


Scope: This procedure applies to all raw material received, graded, inspected, and finished produce items packaged at 32-37 Tompkins Point Rd., Newark, NJ. And stored at 280 Wilson Ave, Newark NJ 07105.

Responsibilities:

1. The President (P), QC Director (QCD) or designate are responsible for establishing standards and procedures to identify and grade raw materials following USDA guidelines and for ensuring finished products meet regulatory and customer requirements.
2. Receiving personnel are responsible for identifying and labeling of raw materials as to original date of receipt, and other identification requirements.
3. Shipping personnel are responsible to confirm the lot numbers and identification of produce placed onto vehicles matches the bill of lading, destination, and other shipping documents.
4. All personnel will be trained to recognize possible conditions of misidentified product. All supervisors shall be trained to recognize faulty labels.
5. The Production Manager (PM) is responsible for printing of correct finished product labels, including information required in event of a recall.

Definitions:

1. Finished Inventory - a lot or batch of raw materials that has been received, formulated, processed and packed and approved for placement into inventory, and has met all USDA requirements and company or customer specifications.
2. Raw material – material received from suppliers, then processes (transforms), with or without other product materials, into its end product.
3. Nonconforming Product – produce that is part of a lot that has been received, formulated, produced and packaged and inspected according to procedures in place at the Golden Platter Foods, Inc. facility and which has been rendered either (1) unsafe by contact with dirty surfaces, equipment, or employees that do not meet personally hygiene and health policies or (2) failure to meet U.S.D.A. regulation or (3) does not meet the company’s quality standards or (4) contact or mixed with ingredients not suitable for halal products.
4. Potentially Unsafe Product or Material – An ingredient, packaging, or equipment condition that does not meet expected food safety specifications or guidelines (failure in CCPs, GMPs, or PRP) and meet the definition of nonconforming product, packaging, or ingredients.
5. Traceability – ability to trace history, application, or location of something (product, raw material, packaging, finished product) by means of recorded information.

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Procedure:

1. Labeling and Traceability - General:


- Record keeping is essential to meeting requirements to ensure product received by customers is safe to use and may be identified and returned if a recall occurs. Company records shall indicate that:
 - i. Correct identification procedures for raw materials and WIP to finished product have been followed,
 - ii. All raw material used in production is accounted for, so that labeling is complete and accurate
 - iii. All finished product is traceable, both internally and externally to ensure compliance with Sec. 2.4.7 (Product Release),
 - iv. Golden Platter Food Ingredients, Inc. is capable of responding promptly and effectively in event of a recall or market withdrawal.
- Within the production process, Golden Platter Food must be able to trace materials at two levels: internal (raw material traceable within the company to finished product) and externally (information accompanies finished product that allows for its identification and return at every link in the produce handling chain)

2. Labeling and Traceability System Requirements


- The QCD and Controller will jointly develop a method that enables identification of incoming raw materials and produce lots and their relation to batches of finished product and the delivery record.
- The Production Manager (PM) is responsible for implementation of an effective identification procedure for raw materials and produce ingredients. At a minimum it will contain:
 - i. a simple way to identify and code incoming supplier, raw materials, and packaging from approved suppliers,
 - ii. ensure inspection procedures are followed,
 - iii. and WIP is identified so that finished product traceability can be ensured.
- Golden Platter utilizes an ERP system for tracking of raw material and finished product. This system records the suppliers, receipt dates, amount received, amount produced, production dates, and pallet ID lot numbers.
- The Controller and Administrative Assistant (AA) is responsible to maintain traceability records for a period of at least 2 years or as required by regulation in the event of a product recall.

3. Procedure: Traceability of Finished Product and Raw Materials

- Receiving personnel shall inspect all inbound vehicles as required by Sec. 11.6.6.R1 (Loading, Transport, and Unloading Practices) and record all inspection results in the appropriate vehicle inspection log.
- Raw materials and packaging will receive a preliminary inspection for evidence of tampering or other damage. The warehouse receiving associate marks receipt date on the individual pallets. Damaged materials will be place on QA hold. Acceptable materials will be released for inventory storage.
 - i. Halal certified meat products must be identified as such upon receipt (i.e. product label, receiving papers).

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- Production Manager communicates with Purchasing Manager and Shipping Receiving Manager to track product inventory. Sales orders and BOLs are used to track inventory and lot numbers on outgoing product. The Golden Platter Foods, Inc. internal database tracks inventory by lot number. The receiving associate will use receiving date on pallet to use oldest product in inventory to ensure FIFO and proper inventory rotation
- Raw materials with known allergens will be received from suppliers with proper identification and if packaging is intact and there is no evidence of leakage or spillage, packages will be released for storage within the proper storage location.
- The current inventory file system links together the
 - i. Skids and raw material identification codes,
 - ii. pallet tag nos. of inspection and approved raw materials,
- Shipments of raw materials that are unacceptable upon initial inspection, are refused, then vehicle records are maintained and the raw material is sent back to the supplier or discarded after noting the lot numbers and amounts in the non-conforming raw and finished material log 2.4.6.R1.
- Receiving records such as bill of lading and lot number records permits tracking of raw materials back to the supplier (1 step back).
- During production, raw material lots are recorded on Batch Formulation records.
- If a raw material is removed from its original packaging and placed into stainless steel totes (ex: ground meat, breading) the tote is labeled to ensure the correct product is used for the right processing line. In some cases, the original packaging label may be carried over.
- Finished products are manufactured or repacked according to the customer’s request, are prepared following Golden Platter Food Ingredient, Inc. manufacturing order which incorporates the weight and lot # identification of all raw materials. Finished products are given lot# identification prior to placement into inventory storage, that is linked to raw material lot numbers, and this permits the traceability to the customer (1 step up).
- When an order is received, product sales orders are generated and the order is produced. The finished product lot number is part of the shipping documents (bill of lading). The finished product lot number is linked to the manufacturing database which contains all ingredient and packaging lot numbers.
- Following Sec 2.4.7 (Product Release) the PM or designated individual reviews the processing records and approves pallets needed to fill the order. This may require inventory produced on different days. But since all cases have manufacturing dates, traceability is ensured with the BOL sent with the shipment and retained copy.
- The outbound vehicle is inspected, the approved and picked inventory receives a final inspection before loading. Copies of the BOL with finished product lot #s are attached to the shipping log (11.6.6.R2).
- In event of a possible recall situation, the customer will provide Golden Platter Foods with a copy of either, 1) BOL, 2) P.O sales order number, 3) date of delivery (invoice data). With any of this information Golden Platter Foods Inc. is able to trace raw materials to finished product in a final returned order.

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4. Traceability Protocol Review

- The PM or QCD will review the logs and other records generated to determine if the labeling protocol is being followed, at least annually.
- Any non-conformances will be handled by following Sec. 2.4.5 documentation requirements.
- A regular 3rd party audit of the labeling and traceability systems should be conducted at least annually. This audit should address the following areas:
 - i. Is the labeling system properly communicated to internal parties; is training provided as required?
 - ii. Does everyone involved in labeling activities understand their responsibilities and how to report potential problems?
 - iii. Has the traceability system been tested at least once in the past 12 months to ensure reliability in event of a recall?
 - iv. The acceptable rate of identification and recovery from a traceability exercise is 100% or more.
 - v. For Costco Products the recall process must be completed in 2 hours or less.

5. Annual Test of Traceability Protocol

- The traceability protocol will be tested at least annually and records maintained that show the effectiveness of the lot identification and traceability outcome.
- Traceability tests will be performed either on raw materials, finished goods, or packaging materials,
- Traceability tests will be documented and include: 1) starting identification and quantity of raw material or finished goods and 2) final disposition of traceability, accounting for raw material, WIP, and finished goods starting amounts.

Records:


1. Shipping Log (11.6.6.2R)
2. Nonconformance Activity Log (2.4.6R1)
3. Corrective Action Log (2.5.5R1)
4. Annual report of traceability exercise (2.6.2.R1)

Approvals:

Approved by:	Signature:	Date:
Monica Quinonez		11/19/2021

Document Change History:

Date	Version	Change	Approval
5-26-2014	Original		
05/28/2016	1	Updated to reflect the Costco timing requirement for complete a recall.	
01/03/2018	2	Yearly Reassessment & Update to SQF V8	
01/03/2019	3	Yearly Reassessment. No change.	
01/04/2020	4	Yearly Reassessment. No change.	
01/05/2021	5	Yearly Reassessment. No change.	

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11/19/2021	6	Yearly reassessment. Updated to SQF V9 and added third line.	
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