



Repack/Commingling Case Best Practices

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How do we define repacking?

For the purposes of this document, repacking typically refers to the process of taking product from one pack type (e.g. carton) and repacking it into a new pack type which could include a different outer pack or inner pack, or both. Repacking involves homogeneous (same) product being reconfigured, including splitting cases to create new, smaller cases (e.g. splitting an 88 count case of apples into 2 cases, each containing multiple 5 lb units).

How do we define commingling?

For the purposes of this document, commingling typically refers to the process of taking different, non-homogeneous, products from multiple sources and combining (commingling) it to create a new product.

Commingling can occur for many reasons including commingling various items into one consumer sales unit (such as salad mix and stoplight peppers), quality assurance culling and replenishment from new lots, and utilization of byproduct (e.g. outer leaves of romaine hearts used to create diced salad or other products). Regardless of the reason for commingling product from two or more lots, it is crucial to link lot numbers to ensure the integrity of lot numbers and an organization's ability to trace.

What is the traceability challenge with repacking or commingling product?

In a repack operation, product from various points of origin are typically blended or comingled to create a new product. This can be a consumer packaged product (e.g. salad mixes) or produce sold bulk (e.g. apples received from one case and repacked into another). If traceability is not maintained during the repack process, the information from the original inputs used in the repack or commingling process will not be available, which puts vast quantities of a commodity, and/or the commodities used as original inputs, at risk in a recall.

What information is needed for repacked or comingled product?

1. During the repacking or commingling process, the GTIN and Lot/Batch # from each original input used in the repacking or commingling process must be recorded. (If the repacking or commingling is part of an internal operation, e.g. commingling products grown and packed within the same operation, the input number may be a proprietary number not a GTIN.)
2. A new GTIN and Lot/Batch # for this “new product” must be created.
3. A link between the new GTIN and Lot/Batch # and the original GTIN (or proprietary number) and Lot/Batch #'s from each of the original inputs must be maintained.

In the event of a recall, what product could potentially be implicated?

It is important to understand that, by the very nature of mixing products with different lots into one product with one final lot, in the event of an incident requiring trace back all of those original lots will be implicated.

Best Practices

#1: Assignment of GTIN: All packers repacking or commingling product must assign a new GTIN to the newly created item. This GTIN will include the Company Prefix of the brand owner of the newly created case.

#2: Assignment of Lot Numbers: All packers repacking or commingling product must assign a new output lot number to the newly created product. The lot number itself can vary from one company to another, but should be a number (e.g. a work order number) which represents all inputs to that production run. As part of internal traceability within the operation, links to all inputs, including original lot numbers, packaging material, pack line processes, raw product, etc. must be maintained to ensure the integrity of the output lot number. The only restriction to the composition of the Lot/Batch number is that it cannot be longer than 20 characters.

NOTE: It is important to remember that your lot defines the amount of product that may be implicated in a recall and needs to be considered during assignment.

#3: Encode both the newly created GTIN and corresponding Lot #in a GS1-128 barcode. Use AI (01) for the GTIN and AI (10) for Lot/Batch #.

#4: If the Lot # is not unique by pack date, encode the Pack Date in the GS1-128 barcode as well. Use AI (13) for the Pack Date.

#5: Print the GTIN and Lot # just below the barcode in human readable form. This must be done in the event the barcode will not read.

#6: Link new GTIN with new Lot # – Be sure to link the newly created GTIN to the newly created Lot/Batch #. This will ensure that you have the specific information you need to narrow in on the implicated product.

#7: Link new GTIN and Lot # to original inputs – in order to maintain the information needed by growers from your original inputs, link the newly created GTIN and Lot/Batch # to the GTINs and Lot/Batch numbers from each of your original inputs.

#8: Other sources of supply - maintain records of other product inputs (e.g. packaging material). This information is equally critical to your company’s body of internal traceability information.

#9: Data retention- All companies are expected to maintain records that will facilitate timely and accurate traceability and support any product recalls.

It is recommended that your company establish your internal data retention policy based on the following considerations:

- Government or market requirements
- How long your product may exist (somewhere) in the supply chain
- The need to retrieve data in the event of an epidemiological trace-back which may or may not implicate your product.

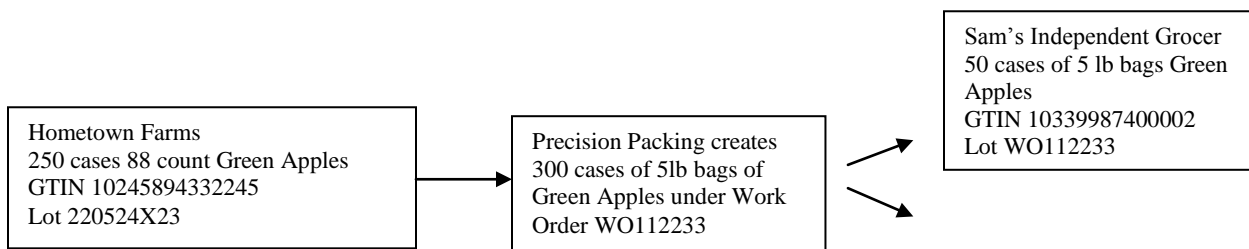
BUSINESS EXAMPLES:

Example of a Repacked Product

Who are the trading parties?

Precision Packing is a produce packing company that operates a repack facility where product is received bulk from a grower/supplier. The product Precision Packing receives will all be the same product, green apples, but will carry the grower/supplier’s GTIN and lot numbers. Precision Packing will repack the produce into cases containing 5lb bags to be delivered to Precision Packing’s customers.

Diagram of the repack process:



Really Big Retail
250 cases of 5 lb bags of
Green Apples
GTIN 10339987400002
Lot WO112233

What needs to be traced?

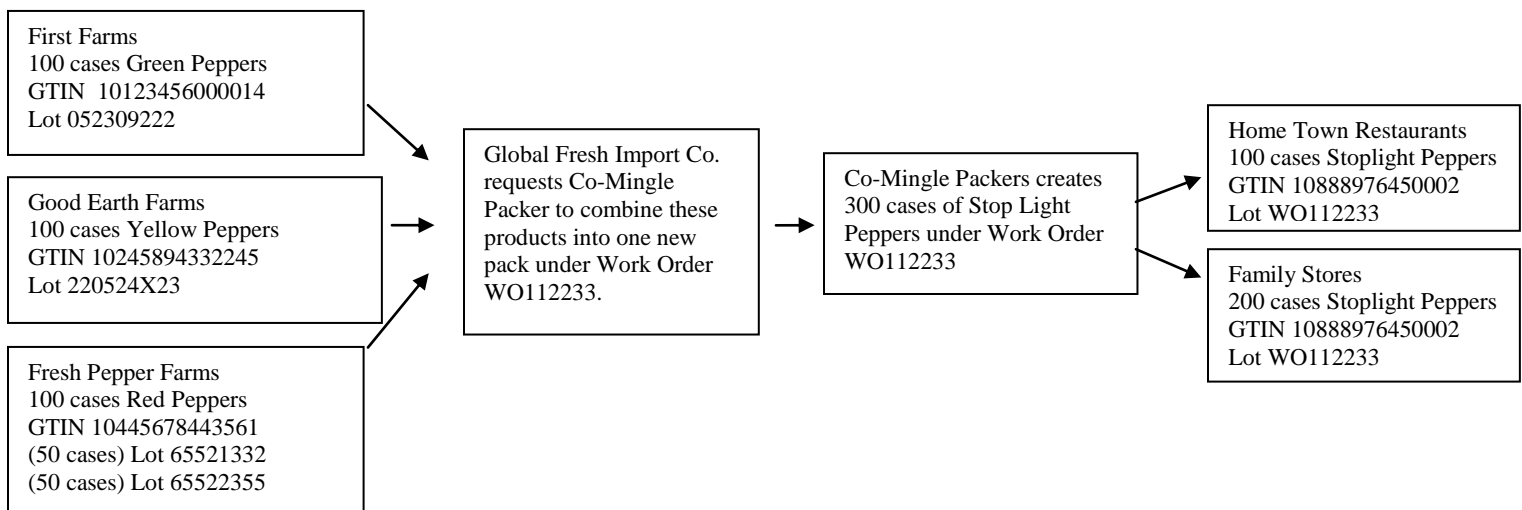
Precision Packing will repack product with a grower/supplier's GTIN and Lot Number into new cases containing 5lb packages with a new GTIN and Lot Number assigned. Each new case will have a new GTIN and a new lot number which links back to the input GTIN and lot number of the input product. Precision Packing must record the grower/supplier's GTIN and Lot Number and link them to this new Lot number and maintain that information in their records.

Example of a Commingled Product

Who are the trading parties?

Co-Mingle Packers is a produce packing company that operates a repack facility where product is received from grower suppliers, through the services of Global Fresh Import Company, an importer who delivers packed product to Co-Mingle Packers facilities. The product Co-Mingle Packer receives will be from multiple growers and Lot numbers which will be co-mingled into the same package to be delivered to Co-Mingle Packers' customers.

Diagram of the commingling process:



What needs to be traced?

Co-Mingle Packers will combine product with multiple GTINs and Lot numbers into a new package where a new GTIN and Lot Number will be assigned. Each lot of product

repacked will need to have a lot number assigned to track the input product to the output product. Co-Mingle Packers must record all the GTINs, Lot Numbers and Quantities of each input to this new Lot number.

(In both of the above business examples, if the repacking or commingling is part of an internal operation, e.g. commingling products grown and packed within the same operation, the input number may be a proprietary number not a GTIN.)