

Implementing PTI: Best Practices for Repacking and Commingling

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Introducer

Ed Treacy

- Vice President, Supply Chain Efficiencies, Produce Marketing Association
- Co-Chair, PTI Implementation Working Group



Today's outline

- Overview of repacking and commingling
- Best Practices
- Business Example of repacked product
- Business example of commingled product
- Example of repack records to be maintained for a recall
- Q & A



Overview of repacking and commingling

Teri Miller

- Produce Category Manager, Delhaize America, LLC



Overview of repacking and commingling

- How do we define repacking?
- How do we define commingling?
- What is the traceability challenge with repacking or commingling product?
- What information is needed for repacked or commingled product?
- In the event of a recall, what product could potentially be implicated?



Best Practices

Peter Hill

- Director of Grower Relations & Food Safety, Alpine Fresh, Inc.



Best Practices

- All the standard PTI best practices must be referred to for GTIN assignment, Batch/Lot Numbering and Case labeling. The following best practices are in addition and specific to repack and commingling product.
 1. Assignment of GTIN
 2. Assignment of Batch/Lot Numbers
 3. Case Labeling
 4. Link Input and Output Product
 5. Other Sources of Supply
 6. Data Retention



Best Practices - Assignment of GTIN

- A new GTIN must be assigned to output product where the brand owner or packing of the output product is different from the input product.



Best Practices - Assignment of Batch/Lot Numbers:

- A new Batch/Lot Number should be assigned to the output product to relate all input and output product to this repack run.
- Note: A new GTIN is not required where the product is only being reconditioned for quality.
- Exceptions:
 - A new Batch/Lot Number is not required when product is being reconditioned for quality and a majority of the batch/lot will be reconditioned. Note: If only a portion of the batch/lot is reconditioned then the whole batch/lot may be included in a potential recall. The re-packer may limit the scope of the recalled batch/lot based on their internal tracking system determining where product may have been shipped.



Best Practices – Case Labeling

- When new labels are applied to a previously labeled case, the original label should be removed or covered by the new label.



Best Practices – Link Input and Output

- The re-packer is required to maintain documentation to link the input and output product for a repack run
- A repack run should be related to a specific task of required output and input product; the repack run should also have a start and finish within the same day
- A unique reference number should be assigned to each repack run. This reference number is recommended to be used as the batch/lot number for the output product.
- All companies are expected to maintain recorders that will facilitate timely and accurate traceability to support product recalls



Best Practices – Other Sources of Supply

- Maintain records of other product inputs (e.g. packaging materials)



Best Practices – Data Retention

- It is recommended that your company establish your internal data retention policy based on the following considerations:
 - Government and market requirements
 - How long your product may exist in the supply chain



Business examples

Steve Roosdahl

- Director of Supply Chain, Operations and Quality Control, The Oppenheimer Group

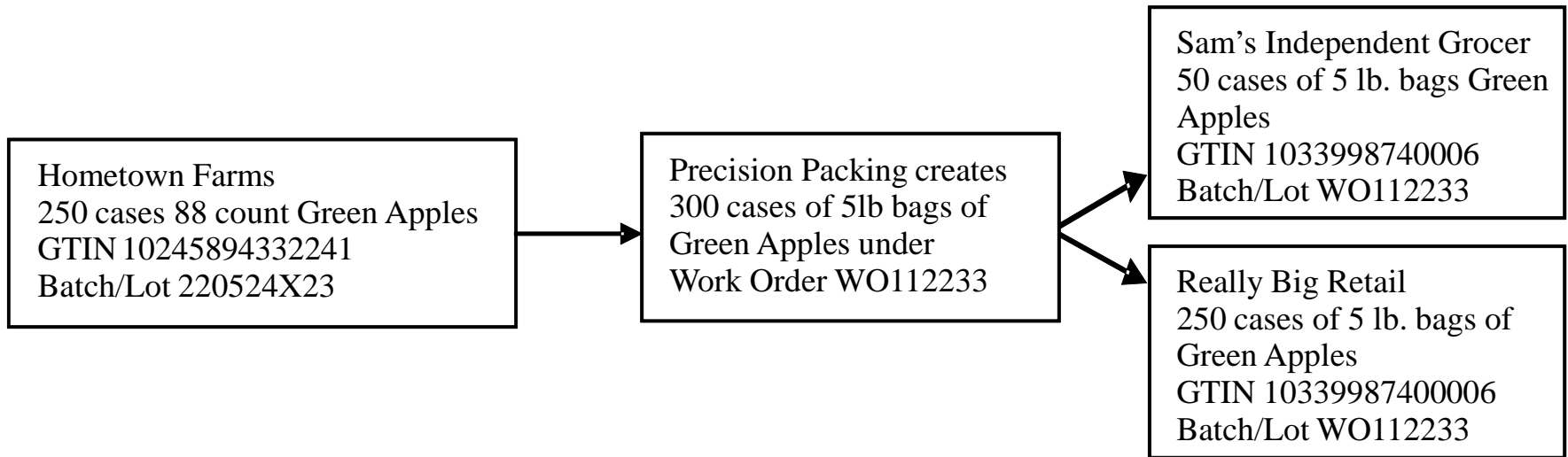


Business example of repacking

- Who are the trading parties?
 - Hometown Farms - grower/packer/shipper
 - Precision Packing - produce packing company
 - Sam's Independent Grocer - retailer
 - Really Big Retail - retailer



Diagram of the repack process:



What needs to be traced?

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



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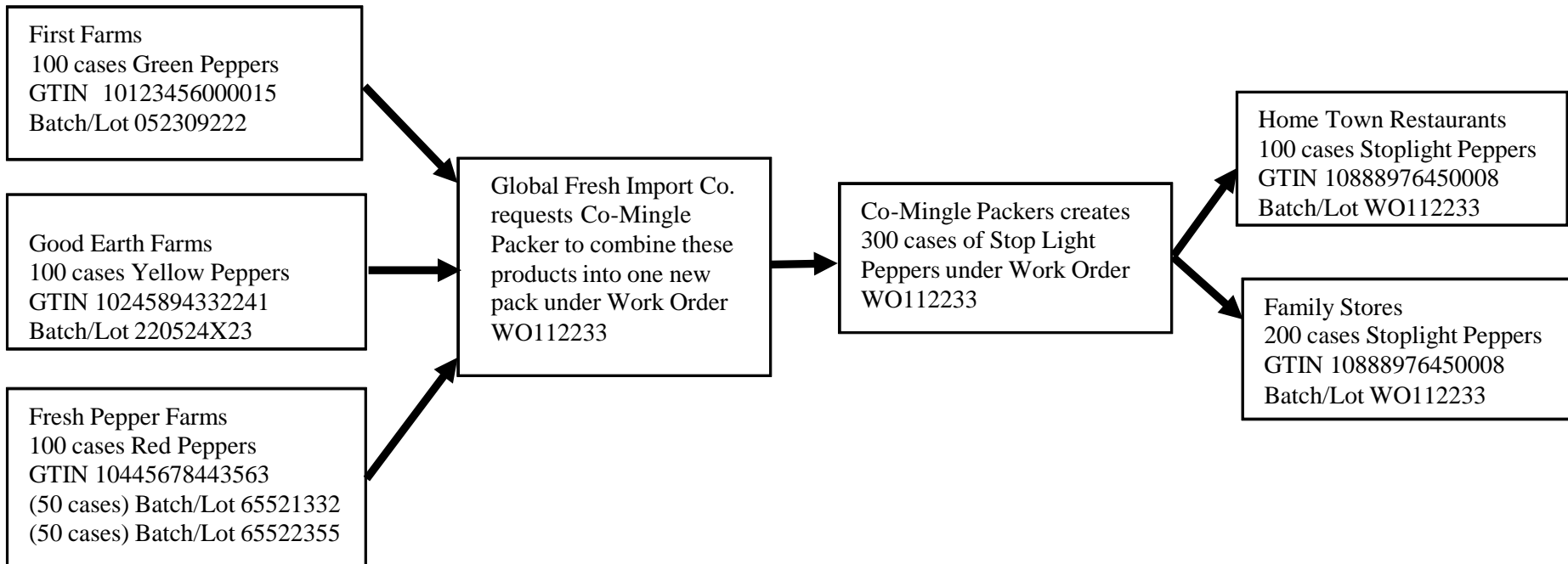
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Business example of commingling

- Who are the trading parties?
 - First Farms, Good Earth Farms, Fresh Pepper Farms - growers/packers/shippers
 - Global Fresh Import Co. - produce importer
 - Co-Mingle Packers - produce repacker
 - Home Town Restaurants - foodservice operator
 - Family Stores - retailer



Diagram of the commingling process:



What needs to be traced?

- Co-Mingle Packers will combine product with multiple GTINs and batch/lot numbers into a new package where a new GTIN and batch/lot number will be assigned.
- Each lot of product repacked will need to have batch/lot number assigned to track the input product to the output product.
- Co-Mingle Packers must record all the GTINs, batch/lot numbers and quantities of each input to this new batch/lot number.



Example of Repack records to be maintained for a recall:

Work Order	Brand Owner	Product	GTIN	Batch/Lot#	Cases
WO112233	First Farms	Green Peppers	10123456000015	052309222	100
WO112233	Good Earth Farms	Yellow Peppers	10245894332241	220524X23	100
WO112233	Fresh Pepper Farms	Red Peppers	10445678443563	65521331	50
WO112233	Fresh Pepper Farms	Red Peppers	10445678443563	65522355	50
WO112233	Global Fresh Imports	Stop Light Peppers	10888976450008	WO112233	300

Reference to link the input and output in a repack

Batch/Lot Number of input products and new Batch/Lot Number for the output product



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Q&A: To ask a question...

- Type it into the “Q&A” box
 - bottom right corner of your WebEx window
- Send your question to “all panelists”
- Questions are submitted anonymously, to protect participants’ privacy



PTI Best Practice Guide for Repacking and Commingling

Angela Fernandez

- Senior Director, Industry Engagement,
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Thank you!

- © Produce Traceability Initiative
- Recording, slides posted to PTI website
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