

Label Control

One key element to food safety is ensuring that ingredients in a product are declared on the label. The regulatory affairs group of an organization is typically responsible for ensuring that labels are designed in accordance with regulations at the destination country. This is part of the product development function. Label control is the ongoing control of these labels at the manufacturing level.

Label control includes:

- Confirmation of correct labels upon receipt
- Label confirmation at time of use
- Security measures for obsolete labels

Labels may be part of primary or secondary packaging. In either scenario, when they arrive at the plant, labels should be reviewed to ensure they are in agreement with the original specification (or graphic approval). Some receiving offices include the master for each label for comparison. Another way to do it is to have an acetate (or transparency film) made of the label. This can then be laid over the incoming package or label and a quick check can be done to ensure that all words and graphics align. This method helps to alleviate any language issues and may be preferred if labels are designed for exported products, where different languages and characters may be used.

Once correct labels have been verified, it is important that they then be transferred to the line at the correct time. It is advised that packaging only be brought to the line when it is the packaging for the product currently being run. For efficiency purposes,

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some operations bring all the packaging for a given shift to the line. However, this increases opportunities for the wrong label to be used. Part of line setup and each product changeover should include documented label verification. Label verification includes removal of any labels or packaging that is not needed for the product about to be run; confirmation that the packaging materials on the line are the correct ones for the product; sign off by someone



other than the person who put the packaging on the line that it is correct. This confirmation needs to be done at startup, product changeover, and anytime a new unit (roll, wicket, stack, etc.) of packaging or labels is put on the line. For primary packaging, the lot numbers of the packaging must also be recorded on batch, production, or packaging records. Allergen recalls are largely attributed to the correct product being manufactured, but the wrong label or packaging material getting put on the line, leading to undeclared allergens.

There are times when labels in stock become obsolete. This can happen for a variety of reasons including formula or regulatory changes. Until the time that the labels can be properly destroyed, they must be kept secured to prevent inadvertent use. Beyond the use of hold tags, segregation and locked confinement are recommended.

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Reference Card

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- Confirmation upon receipt
- Verification at time of use
- Security of obsolete labels

Which of the following steps in the operation likely involves confirmation of correct labels for finished product?

Packaging receiving	
Raw material storage	
Ingredient mixing	
Line startup	
Cooking	
Line sanitation	
Line changeover	
Weight/volume checks	
Palletizing	
Finished goods storage	
Shipping	