IMPROVING Your Label Verification Program

Taking a few simple steps to ensure that the correct label is being applied will greatly reduce risk to consumers, cost to manufacturers, and time spent by regulators monitoring recalls.
Undeclared allergens have held the #1 spot in reasons for Class I recalls since overtaking Salmonella for the lead in 2011. In fact, by the end of first quarter 2012, undeclared allergens had accounted for 40 percent of food product recalls. The Allergen Control Program is complex, but the one component that is causing the majority of allergen recalls is failure in label verification.

In most cases of undeclared allergen recalls, the correct product was produced according to the allergen-containing formula without cross contact, but at the end of the manufacturing process, the wrong packaging was used, leading to an undeclared allergen. It is logical to assume that this type of mislabeling happens with less dire consequences when allergens are not involved.

To address this, a Label Verification Program is needed to ensure that the appropriate label is being applied to the product being produced. These labels may be primary or secondary packaging. Primary packaging includes items such as printed poly bags and printed Kraft paper bags, whereas examples of secondary packaging may include printed paperboard and adhesive labels placed on primary packaging.

Label verification involves confirming that the correct label is being used at the set-up of each run, at each product changeover, and every time a new unit of packaging material is brought to the line. Diligent label confirmation will help ensure that mislabeling mistakes won’t occur.

Other potential pitfalls that could cause undeclared allergen recalls would be obsolete packaging not being adequately segregated and secured or partially used packaging being put back in the wrong case and then used. These mistakes could lead to mislabeling issues and, in worst case, an allergic reaction by a consumer.

The Label Verification Program is in addition to a Label Review Program in which the information on the labels is confirmed for accuracy. Use the following tips to improve your Label Verification Program*:

- Use inline bar code scanners to confirm that the UPC of each package matches the product being produced.
- Manually match UPC codes between the package and the product.
- Maintain an image of the correct package on the changeover checklist for comparison.
- Remove from the packing area all packaging that is not actively in use.

Don’t stage packaging that needs to go back to inventory or packaging that will be used later in the packing area.
- Maintain a label from the run with the records for each run; then have a supervisor verify these records at the end of the shift.
- Include the sampling of packaged product and a review of labels in QC sampling procedures. Facilities often avoid sampling packaged product due to the added cost of destroying the packaging, but given the cost of a recall, this seems to be a worthwhile investment.
- Implement line clearance during change-overs that includes removal of all product and packaging from the previous run from the line prior to releasing the line for production of the next product.

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* Not all options are applicable to all types of labeling.