

How to Guide: Conducting Effective Label Checks

INTRODUCTION & OBJECTIVE

Label Checks are sometimes referred to as Label Verification Checks. This guide is intended to give you an overview of how to effectively implement and conduct manual label checks.

It is important that the correct and current label is applied to the right product. Failing to do so can result in product containing incorrect information that, in some cases, can cause serious harm to our customers such as product containing an incorrect allergen warning statement or no warning statement. An incorrect label being applied to a product can result in a product withdrawal or even a product recall. The cost of conducting a withdrawal or recall may also include damage to brand integrity and increased complexity to store operations.

Many product withdrawals/recalls can be attributed to incorrect packaging or labelling. Extra care should be applied where:

- Products of similar appearance are being manufactured
- A standard product may be packed into different types of packaging
- There is a product range with similar labels, each containing different information eg. allergens and net weight

DEFINITIONS

Label Library: A reference document containing all current labels/master files that display all content on the label in legible format.

Pre-labelled Product Packaging: In-coming raw material packaging that is pre-labelled by an approved supplier(s). This may include inner sachets such as dressings, sauces, spice blends, or the final product packaging. These types of packaging shall be included as part of the label verification checks.

Promotional Labelling: Any additional labelling that is applied to a product for a short period of time. This type of packaging shall be included as part of the label verification checks.

Digi Label: A label that requires additional printing information at the time of packing such as product name, random weight, price per kg etc. This type of packaging shall be included as part of the label verification checks.

FREQUENCY

Manufacturers must be able to control label stock and the labelling process from receipt and storage through to packing to prevent labelling mix-ups.

Visual checks on all aspects of finished product packaging shall be conducted on the first pack of the run, the last pack of the run, the first pack after any break in production and for each label box/roll replenished during a production run. The frequency during production shall be based on risk assessment.

The visual checks may be reduced where an automated coding system is in place, but are still required as a verification activity.

RESPONSIBILITY

Label checks should be conducted by various cross functions within the business including production, warehouse, maintenance and QA/Technical. If possible the production staff member responsible for the second check should be from a different line.

Trained production and warehouse staff shall be required to record all completed label checks. These checks are to be verified by QA/technical personnel.

QA/Technical should be responsible for conducting training of all relevant staff for effective label checks.

PROCEDURE/EXPECTATIONS

Receival and Storage

- Upon receipt of all packaging and labels, the label must be checked for compliance against the label library prior to moving stock to storage. Ensure there is dedicated storage for all packaging material and racks are clearly labelled to identify label or packaging type. This should be maintained on a daily basis to ensure label or packaging is not mixed up.
- Mixed pallets or boxes of packaging should be sorted and where different batch codes are identified, all codes must be recorded to ensure traceability is maintained.
- Leftover labels from a production run must be returned to the dedicated storage area when finished in order to avoid the incorrect label being used and/or loss of traceability.
- Where pre-packed components are sourced from other raw material suppliers, sensory checks and label checks must be conducted at receival stage to ensure the correct product is in the correct pre-packed component.

Change-over

- Ensure the line is 100% clear of all previous labelling.
- Only labels for one product at a time should be brought into the line area (if not possible ensure next product labels are clearly segregated and identified). For fast moving packaging, use dedicated storage racks.

Pre-Run & during run

- Part rolls or pack rolls should always be used at the beginning of the run. As part of the label check, take one label of each roll or pack of labels and stick onto or attach to run notes/ production check-sheet. Also include any promotional/additional labels where applicable.

- Run notes/production check sheet should include all relevant details such as product name on label, label ID #, label print date etc. Refer to Appendix 1 **Example of Label Verification Check Sheet**.
- If a product label cannot be attached or stuck onto the run notes/production check sheet, alternative methods should be in place (eg. photograph of the label or sample of the product).
- Matching Front of Pack (FOP) and Back of Pack (BOP) labels – placing a 3L label on a 2L bottle is a common error, even though the barcode numbers are different.

Multi-packs

- Inner and outer label checks against the approved label library must be conducted for multi-packs and variety packs.

Digi labels

- For online printed digi labels, the check must ensure that the label is legible & correct - without any information missing or poor ink jetting.

Checks shall include:

- The current label should be checked against the approved label library to ensure that the latest version is being used.
- A minimum of one person conducting the label check and a second person also verifying the label should be in place. The first and second person must sign their initials on the run notes/production check sheet.
- Only one person should be authorised to pick labels and return labels to storage after the production run. This authorised person must sign the labels in and out of storage on the run notes/production check sheet for traceability purposes.
- Label checks must be incorporated into the HACCP plan as QCPs therefore requiring QA/technical team sign-off.
- The importance of these checks should be emphasised to all operators to ensure mistakes do not occur. Label verification checks should not be tick and flick exercise.
- Manual checks should be conducted at all other packaging steps (eg. Carton/shipper) on line and at the palletiser to ensure 100% of labels and packaging are correct for the product.

Product release

- Label checks must be incorporated into the product release inspections. Vendor is to ensure that this is done before product is dispatched.

Post run

- When returning part boxes or rolls of packaging, ensure record is kept of:
 - ❖ Time of return
 - ❖ Number of full and part packs returned
- Ensure it is correct label.
- Attach label to part box.

Obsolete label

- When a product is deleted or product label is updated, the vendor must ensure the old label is segregated and securely destroyed. When there is a new label or updated label, the production staff must be notified.

Monitoring and Corrective Action

Any non conformances should be investigated to determine the root cause. Where issues are identified during label checks:

- Ensure label is segregated immediately.
- Escalate the issue to the team leader or manager.
- Identify total stock affected and place on HOLD in quarantine area.
- A documented root cause analysis investigation and corrective actions shall be recorded for all non-conforming label issues identified. This shall also include any product packaging that may not have been dispatched.
- If product has already been dispatched to Woolworths, your Woolworths' Quality Specialist must be contacted advising a summary of the key issues identified.

Appendix 1: Example of Label Verification Check Sheet

ATTACH COPY OF PRINTED LABEL HERE	Operator name completing check:
	Date:
	Time:
	Product /Packaging Code:
	Label print date/Job number:
	<u>Check label against current label library:</u>
	Product Name:
	Brand:
	Barcode:
	Vendor Code:
	Weight Statement:
	Ingredient Listing:
Country of Origin:	
Allergen(s)	
Nutrition Information:	
Storage Information:	
Supplier Information:	
Date/Time Code and format correct:	

	Is the label clear and legible?
	Does the label match the example of current label?
	Supervisor verification:
	Total labels printed/used:

Comments:- -----

QA/Technical Verification -----
Date-----
Time-----

(Labels shall also be maintained for Back of Pack labels where applicable. Film shall be maintained using a similar method)