

	Section: Attaining Food Safety	Issue Date: April 20, 2015	Document Number: 2.4.6
	Subject: Non-Conforming Product or Equipment	Supersedes:	Revision: New

OBJECTIVE:

To ensure that products and materials, which need to be specifically identified, isolated, and held pending determination of their final disposition, will not be inadvertently utilized in production or introduced into the market place.

SCOPE:

All finished products, ingredients, packaging materials and equipment used at the facility

PROCEDURE:

I. Hold Definitions and Procedures

Hold Classification - a hold shall be classified into two (2) categories:

A. **Category I Hold**

1. Application

Category I Hold shall be used for situations when a nonconformity, or suspected nonconformity, poses a potential food safety or major regulatory compliance concern. This category of hold applies to materials / products/equipment:

- a. Suspected to contain a biological, chemical, or physical hazard that may cause illness or injury. Examples include but are not limited to pathogens, undeclared allergens, metal, glass;
- b. Undergoing pathogen or chemical hazard (e.g. *Salmonella*, *Listeria*) testing;
- c. Implicated by presumptive-positive, or confirmed positive pathogen or chemical hazard (e.g. *Salmonella*, *Listeria*, allergen) test results;
- d. Product produced under CCP deviation;
- e. Suspected of tampering or criminal or terrorist actions; and
- f. Found to be misbranded.
- g. Equipment that poses an immediate food safety risk

2. Procedural Steps: The following actions shall be taken in the event of a Category I Hold:

- a. Product / materials shall be placed in a segregated area.
- b. All affected product shall be visually identified with Category I hold tags on each pallet (red tag for Class I), case or rack and physically obstructed. Physical obstruction may be achieved by placing chains across bays or hold tape wrapped around pallets, case or storage rack.
- c. Inventory shall be confirmed **daily** and documented in a hold log.

B. Category II Hold

1. Application

Category II Hold shall be used for situations when a nonconformity, or suspected nonconformity, poses a potential quality issue. This category of hold applies to materials / products/equipment:

- a. Having slight printing packaging errors (faded color);
- b. Pecan sizes
- c. Pecan Color
- d. Out of product specification
- e. Equipment that causes quality related issues

2. Procedural Steps: The following actions shall be taken in the event of a **Category II Hold**:

- C. Product / materials should be placed in a segregated when possible.
- D. All affected product shall be visually identified with Category II hold tags **and / or** physically obstructed to prevent inadvertent movement (yellow tag).
- E. Inventory shall be confirmed **weekly** and documented in a hold log.

II. Hold Tags

- A. Hold Tags shall be a bright color for ease of identification (red for class I and yellow for class II) and visibility to employees regardless of the category classification. There is only one hold tag and it is to be used for any hold no matter the classification.
- B. Hold Tags shall be at least 8 ½ x 11 inches in size and should be self-adhesive. The Hold Tags shall be printed with the following information:

1. HOLD QUALITY ASSURANCE

- Location
- Reference Number
- Product Description
- Product Code
- QA Name
- Total Number of Cases
- Reason for Hold
- Number of cases returned

- Number of cases reworked
- Number of Cases Destroyed
- Hold Tag #
- Category

The specific reason for the hold should not be identified on the tag unless required by a regulatory agency; rather, a reference number shall be assigned and entered into the hold log.

- C. Mascot Incorporated shall provide hold / release policy and hold tags to all relevant personnel

III. Responsibilities

All plant, and warehouse personnel have the authority to place product on hold. The individual placing product on hold, including warehouse personnel, shall notify the SQF Practitioner, Plant Manager or Office Manager who will verify that the appropriate hold classification is assigned, issue a hold reference #, document hold information in hold log for in-plant holds, and assure procedures identified in this policy are followed.

The SQF Practitioner shall notify the President and/or Office Manager of all Category I holds. The President and/or Office Manager must approve any release or destruction of product placed on Category I hold at the facility or at an off-site warehouse. The SQF Practitioner manager shall document the disposition of held product in the hold log.

Only the SQF Practitioner under the direction of the President and/or Office Manager has the authority to release or destroy product that has been placed on Category I or II hold in the facility. The SQF Practitioner should involve the Plant Manager and President in the decision.

IV. Records

Complete documentation of all product holds shall be maintained to allow for complete accountability and reconciliation.

The hold log shall contain at a minimum:

- Location
- Reference Number
- Product Description
- Product Code
- QA Name
- Total Number of Cases
- Reason for Hold
- Number of cases returned
- Number of cases reworked
- Number of Cases Destroyed
- Hold Tag #
- Hold Category

V. Training

Employees who receive and load out products shall be trained in the hold / release procedures to prevent inadvertent release of products. This training shall be documented. Refresher training shall be conducted annually and documented.

REFERENCE:

SQF Code 7.2

Recall and Traceability Procedures

DOCUMENTS:

Hold Log

Hold Tags

Training Records

<u>Document History of Changes / Amendments</u>	<u>Date</u>	<u>Name</u>
Procedure created to meet SQF Code, 7.2 Edition requirements	April 20, 2015	Amy Vizcarra

Exhibit 1

Location:

QUALITY HOLD
DO NOT SHIP

REFERENCE #: _____

PRODUCT: _____

CODE: _____

QA NAME: _____

TOTAL # OF CASES: _____

Reason for hold: _____

Number of cases returned to inventory: _____

Number of cases reworked: _____

Number of cases destroyed: _____

Return this tag to QA.

Hold Tag ____ of ____

CATEGORY: _____

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