Code of Practice
Version 2
Control & Verification of Packaging, Labelling & Coding
1. INTRODUCTION & OBJECTIVE

Customers have an expectation that the labels on a Woolworths branded product are true, honest and transparent. They must represent the product and not mislead or deceive customers.

In order to ensure any product descriptions are true and accurate, it is essential that they are validated during the product development process and then regularly verified. The product label needs to remain constant through the entire shelf life of the product.

It is important that the correct (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 even death to our customers such as a 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 the brand integrity and increased complexity to store operations.

These requirements will clearly cover facility expectation, monitoring programs, equipment requirements and verification.

This document supports the Woolworths Supplier Excellence Program and is intended to provide further clarity and guidance on implementation of these requirements. The intention of this document is that it is not to be used in isolation but as a supplement to the full requirements of the Woolworths Supplier Excellence program (or if you have a GFSI Standard in place, to that standard).
To help identify how the requirements must be met for each clause of the Industry Standard - Supply Chain Service Providers a P, R, O has been indicated in the column between each clause number and the detailed description of the Standard Requirements.

P = Procedure: A documented procedure that has been fully implemented.

R = Record: Documented and accurately completed records have been maintained.

O = Observation: Compliance will be checked through observation of practices or adherence to procedures.

<table>
<thead>
<tr>
<th>Section</th>
<th>Clause No.</th>
<th>P</th>
<th>R</th>
<th>O</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>2.1 Labelling Procedures</td>
<td>P</td>
<td>R</td>
<td>O</td>
<td>Procedures must be developed, documented and implemented to ensure product is packed into the correct and current packaging, both retail pack and shipper. These procedures must include: • Methods for the receipt and acceptance of packaging into the facility • Methods of control and issue to line for all packaging, labels, barcode labels, stickers etc • Control of packing lines and/or equipment such that previous product packaging is removed before commencing new product type • Routine verification of correct packaging: — The start/end of packing runs — During label and packaging changeover — Staff breaks, Site Evacuations. • At frequency determined by packaging volume risk assessments. The frequency of the label verification check needs be sufficient to ensure the product is within the supplier’s control • A sample of the actual code printed on the packaging from each check must be retained • Control of any additional printed information (printed on or off line) such as ink jet date codes or additional labels • Control of multi-packs and variety packs both inner and outer • Control of retail saleable units into outer (shipper) packaging and associated labelling identification.</td>
</tr>
<tr>
<td>3</td>
<td>3.1 Receipt and Storage of Packaging</td>
<td>R</td>
<td>O</td>
<td></td>
<td>Packaging Receival Every delivery of all packaging (e.g. Sleeves, Labels, Printed Films, SRP and Outer Cases, etc as applicable to the product) must be assessed on intake for:</td>
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3.1.2 | O | **Packaging Storage**
---|---|---
All packaging must be stored within a secure and clearly dedicated area; must have adequate signage and/or shelf labelling to clearly indicate the exact storage location for the packaging for each individual SKU.

Subsequent deliveries must be checked as per outlined above.

3.1.3 | O | Where packaging such as film, labels, sleeves, promotional stickers have been decanted from their outer packaging they must be protected from contamination and mixing with other similar packaging in storage.

### 3.2 Transfer of packaging to production lines

3.2.1 | O | There must only be one set of packaging and labels present on each production line at any one time and these must be stored in one clearly identifiable location near to its point of use.

3.2.2 | R O | Each item of packaging supplied to every production line must be verified as being the correct item:
- Before packing commences
- Where a batch or reel of labels/stickers runs out and is replenished during a production run
- At the end of every product run or shift.

This must include retaining a sample of items of packaging such as; labels, sleeves and promotional stickers, (e.g. by attaching them to a coding record sheet for the line). Refer to the How to Guide: Conducting Effective Label Checks.

3.2.3 | R O | At any product changeovers and at the end of production runs, all packaging must be returned to its appropriate storage location (see 3.1.2) prior to the next product and packaging being brought to the line.
- A visual check of the packing equipment and all relevant parts of the line must be carried out to ensure that all relevant packaging has been removed. This check must be documented and signed off by an authorised person.
- Any left over pre-coded packaging must be destroyed. The amount must be recorded and the disposal documented. These records must allow for the accurate calculation of mass balances.

### 3.3 Coding

3.3.1 | P O | Product date codes must be derived from a documented coding schedule available at the point at which codes are entered into the coding equipment.
- The coding schedule (including pricing where applicable) must be written in exactly the same format as the code is to appear on product packs e.g. 20 APR not 20/4.
- For any frozen products that are thawed and date coded in stores prior to sell, the traceability/batch code on the retail unit must not be formatted to be confused with the Use By or Best before date applied in stores.
- Where there is a change of month or year on the date code, this must be clearly indicated on the coding schedule.

3.3.2 | R O | Where the finished product is sold with multiple components (e.g. a salad sold with a pouch of dressing to be added by the consumer), stock rotation procedures must ensure the stated shelf life of the finished product does not exceed the shelf life of the component.
- Records of verification checks must be maintained

3.3.3 | R O | Where packaging is coded off-line, checks to confirm the correct coding has been applied (e.g. Batch Code,
Best Before, Use By) must be carried out at the point of printing, in addition to on-line verification checks at the time of packing.

3.3.4  P
If packed products are coded after packing there must be a suitable documented procedure in place to ensure full control of these products.

3.3.5  P R
The times at which coding date changes occur must be defined in the site QMS and this information must be clearly stated. This must be agreed with the relevant Woolworths Quality Specialist.

3.4.1  O
Any labelling and coding equipment must have their fault status linked to the automatic system so that if the coder stops working the production line automatically stops.

3.4.2  R O
Where used, date code printers, label printers and Barcode printers must be programmed by a designated person and be protected from unauthorized tampering.

3.5.1  P R O
Labelling and Coding checks will be carried out at a frequency determined by HACCP plans and risk assessment during the production run.
- If site is using auto coding system, this must also be manually verified at start, any breaks and at the end of production run which also must include date code and packaging.
- All line checks must be carried out by the person responsible for running the packing line or a designated, authorized and trained person.
- Where different but visually identical or similar products are being packed e.g. whole milk and skimmed milk, adequate production controls must be in place to ensure the correct product is being packed.
- Where used, Barcodes must be checked on a regular basis for quality of readability using a suitable scanner.

3.6.1  O
Where automated pack label verification is in place, the system must provide in line continuous monitoring of each finished product pack by scanning of packaging bar codes or other unique identification code or mark to verify that every pack has the correct information for the product being packed. The unique code or mark should also be able to differentiate between different versions of packaging to ensure the correct version is being used.

3.6.2  R O
The site must ensure that access to the automatic pack label verification system is controlled and restricted to appropriately trained personnel.

3.6.3  O
The automatic pack label verification equipment must have visual and audible alarms to warn of any detected faults. Where the automatic system detects a major fault i.e. the incorrect label is being used or the date coder is not functioning correctly then the line must automatically stop. It must only be possible to restart the line with approval from authorized personnel using a password, key or swipe card.

4 Promotional and other Non-routine Product Labels Controls

4.1 Promotional / Non-routine Product
4.1.1  R O
Where practical, promotional & other non-routine product labels and stickers, should be applied automatically on-line as the product is running. Whether the labels/stickers are applied automatically or manually it must be ensured that no other information on the pack is obscured. If promotional labels/stickers are applied the following must occur:
<table>
<thead>
<tr>
<th>Labelling</th>
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<tbody>
<tr>
<td>● Offline finishing of already packaged products must be carried out in a suitably controlled area</td>
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<tr>
<td>● Packaging must be checked and recorded at the point where the promotional labels/stickers are applied.</td>
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<tr>
<td>● A sample of the finished packaging must also be retained as per instructions in Section 2.2.1.</td>
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</table>

Any promotional labelling must also be included on the coding schedule with a clear indication of the start and end dates for the use of the promotional labelling.

Product with promotional labelling shall not be supplied outside the promotional period.

<table>
<thead>
<tr>
<th>4.2 Use of Subcontractors</th>
<th>4.2.1</th>
<th>R</th>
<th>Where an external company is used as a subcontractor for the application of labels/stickers to packaging, each item of packaging must be checked by the subcontractor prior to dispatch to ensure it is the correct item. This must be recorded and a sample of the finished packaging retained.</th>
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<tbody>
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<td>Any external company carrying out this activity must have suitable facilities, standards and the necessary controls in place to ensure that different packaging cannot become mixed during the label application process. These standards and controls must be assessed to ensure they are suitable the results of which must be recorded.</td>
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<td><strong>Note:</strong> The Woolworths approved direct supplier is responsible for all activities conducted by the subcontractor.</td>
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<thead>
<tr>
<th>4.2.2</th>
<th>R O</th>
<th>All packaging returned from external contractors must be checked on intake to ensure that the correct labels/stickers have been applied and the positioning is correct.</th>
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<tr>
<td></td>
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<td>● The results of these checks must be recorded.</td>
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<td></td>
<td></td>
<td>This packaging must then be sealed, clearly marked and stored in a designated area to ensure its segregation from non labelled packaging.</td>
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## Amendments

<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>1. Introduction &amp; Objective</td>
<td>Removed reference to How to Guide Document formatting</td>
</tr>
<tr>
<td>2. Product Labelling Procedures</td>
<td>2.0 Requirements for label / artwork review moved to COP – WOW product Requirements. 2.0 Section retitled to Product labelling Procedures. 2.0 Aspirational requirement removed</td>
</tr>
<tr>
<td>3. Operational Controls – Product Packaging, Labelling &amp; Coding</td>
<td>3.1.1. Removed requirement for mixed packaging to be isolated and rejected 3.1.2 Removed guidance type statement and also specific detail on decanted stock as intent is already captured in 3.1.3 3.2.2 Removed aspirational requirement. 3.3 Aspirational requirement adopted 3.3.3 Removed requirement as intent already covered in COP 3.6.2 Descriptive commentary on pack label verification systems reduced as suitably covered in 3.6.3 3.6.3 Aspirational criteria removed.</td>
</tr>
<tr>
<td>4. Promotional and other Non-routine Product Labels Controls</td>
<td>4.0 Promotional Label Controls moved into section 4 from section 3.4 and further condensed. Removed aspirational requirements and simplified criteria for promotional label checks as will be managed as per routine label verification</td>
</tr>
</tbody>
</table>