

Guidelines for Handling Returns, Reworks And Waste

Feed mills generate various amounts of product that either has to be remixed into other feeds or disposed of as waste. This guideline document provides direction on the issues that mills need to account for when handling returns, reworks and waste.

The FeedSafe Audit Checklist includes a number of clauses relating to this issue as shown below:

- 9.6 Is there a procedure for labeling, storage and handling of reworks and returns?
 - 9.6.1 Is there identification and disposal of classified waste products and are these labelled and segregated from raw materials and finished products?
 - 9.6.2 Are reworks and returns appropriately labelled and segregated?
 - 9.6.3 Are reworks and returns containing RAM or assumed to contain RAM clearly identified as such and are only reprocessed into non-ruminant feeds?
 - 9.6.4 Is there approval for reworks release and reformulation by an authorised person?
 - 9.6.5 Is there a documented procedure for treatment of returns and reformulation into feed?
- 11.5 Are broken or damaged bags of finished product segregated and dealt with to ensure they are not supplied to clients?
- 13.4.5 Do drivers inspect truck compartments to ensure complete emptying and report/record instances of incomplete unloading?
- 17.5 Does the recall procedure specify methods to identify, locate and control recalled product and to isolate recalled product on return to the mill?

Definitions

Reworks (also referred to as remix or reuse): Finished products, raw materials, including work in progress, that is clean, unadulterated and that has left the normal product flow and requires action to be taken on it before it is acceptable for reuse within the feed manufacturing process. Material included in reworks are mixing errors, residual feed left in bins, flushing and cleaning material, broken bags, out of date stock, out of specification stock, spilt raw materials and feed, returns.

Returns: Finished feed that has been delivered to and returned from clients.

Waste: Raw materials, in-process goods and finished feeds that has been classified as being unacceptable for reworking and is to be removed from the site as waste.

Managing Returns, Reworks and Waste

1. Identification of reworks and waste material must be clearly identified to minimise the risk of inadvertent use. This applies to product held in storage bins and silos as well as bags. There should be no risk that product integrity has been lost and the material is mistakenly reworked in an uncontrolled manner. Labelling must be used to identify reworks and waste materials.

Emphasis has to be given to higher risk materials that include RAM, medications and any raw materials that are incompatible for other livestock.

2. Documentation must provide details of the reworks in terms of the materials content. This particularly relates to the content of RAM, medications or any other raw materials and feed additives that are incompatible with

- other feeds. The documentation must include whether the material is quarantined from rework and subject to inspection, sampling and laboratory testing.
3. Evaluation to classify material into reworks or waste must be undertaken by an authorised and experienced person. This will often be the nutritionist basing the evaluation on information relating to the material following where required inspection, sampling and testing. There must/should be a system of releasing reworks from quarantine following evaluation, with the identification process noting this.
 4. Rework procedures need to be in place that defines how reworks are used on site. These procedures need to define, based on the products being manufactured, the risks that have to be avoided.
 - a. Multi species mills using RAM must have high levels of control to ensure no reworks containing RAM is reworked back into ruminant feeds.
 - b. Medications included in feeds and present in the reworks must be identified and their reworking into feeds controlled through feed formulation. Medications via reworks cannot be included in feeds for non-target species or where they will result in residues in meat, milk or eggs.
 - c. Some raw materials and ingredients in reworks must not be included in sensitive feeds e.g. urea inclusion in non-ruminant feeds.
 5. Reworks need to be treated as raw materials within feed formulations. Their use must be controlled with recording of use and traceability should there arise any subsequent feed safety incident that requires investigation. Reworks should never be blended into the feed manufacturing process in an uncontrolled manner.
 6. Returns procedures must be in place. These procedures should define under what situations product can or cannot be returned to the mill. The procedure needs to take account of client biosecurity, where some mills may have a zero returns policy for feed once delivered on farm due to animal disease transmission risk. Feed subject to return needs to be evaluated based on potential contamination occurring outside the control of the mill. This will typically require feed inspection, sampling and testing. If the returns are subject to legal disputation, product release prior to reworks must be authorised by a defined management representative.
 7. Waste procedures – some raw materials, feed in process or finished products need to be classified as waste and are removed from the site for safe disposal. Material that is typically classified as waste are press door scrapings, yard sweepings, cleanings contaminated with various materials considered as adulterating the material, water damaged stock.
 8. Procedures must control waste through labelling so that material does not get reworked.

SFMCA makes no representation about the information contained in this document. It is provided as is without express or implied warranty of any kind. SFMCA disclaims (to the full extent allowable by the Law) all warranties with regard to this information, including all implied warranties as to the accuracy of the information. SFMCA shall not be liable for any damages whatsoever including any special, indirect or consequential damages resulting from loss of profits, whether in an action in contract, negligence or otherwise arising out of or in connection with the information contained in this document. Neither SFMCA nor any of its employees or agents warrants that the information within this document is error-free.
