HOW TO PREVENT THE TOP 5 FOOD SAFETY AUDIT NONCONFORMITIES

TOP 5 AREAS OF NONCONFORMANCE

1. Crisis Management Planning/Management of Incidents
2. Supplier Approval
3. Internal Audits
4. Walls, Partitions, Doors, Ceilings
5. Equipment, Utensils & Protective Clothing

DEFINITION OF NONCONFORMITY

SQF 8	BRC 8.0
Non-conformity (or Non-conformance)	Non-conformity
A minor non-conformity is an omission or deficiency in the SQF System that produces unsatisfactory conditions that if not addressed may lead to a risk to food safety and/or quality but not likely to cause a system element breakdown. A major non-conformity is an omission or deficiency in the SQF System producing unsatisfactory conditions that carry a food safety and/or quality risk and likely to result in a system element breakdown. A critical non-conformity is a breakdown of control (s) at a critical control point, a prerequisite program, or other process step and judged likely to cause a significant public health risk and/or where product is contaminated. A critical non-conformity is also raised if the site fails to take effective corrective action within the timeframe agreed with the certification body, or if the certification body deems that there is systemic falsification of records relating to food safety controls and the SQF System. Critical non-conformities cannot be raised at desk audits.	The non-fulfilment of a specified product safety, legal or quality requirement or a specified system requirement.

1. CRISIS MANAGEMENT PLANNING/MANAGEMENT OF INCIDENTS

SQF	BRC
2.1.5	3.11.1
Crisis Management Planning (formerly Business Cont.)	Management of Incidents, product withdrawal and product recall

2.1.5 Crisis Management Planning

2.1.5.1 A crisis management plan that is based on the understanding of known potential dangers (e.g. flood, drought, fire, tsunami, or other severe weather or regional events such as warfare or civil unrest) that can impact the site's ability to deliver safe food, shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business crisis.

2.1.5.2 The crisis management plan shall include as a minimum:

i. A senior manager responsible for decision making, oversight and initiating actions arising from a crisis management incident;

ii. The nomination and training of a crisis management team;

iii. The controls implemented to ensure a response does not compromise product safety;

iv. The measures to isolate and identify product affected by a response to a crisis;

v. The measures taken to verify the acceptability of food prior to release;

vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;

vii. Sources of legal and expert advice; and

viii. The responsibility for internal communications and communicating with authorities, external organizations and media.

2.1.5.3 The crisis management plan shall be reviewed, tested and verified at least annually.

2.1.5.4 Records of reviews of the crisis management plan shall be maintained.

CLAUSE	REQUIREMENTS
3.11.1	The company shall have procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality. This shall include consideration of contingency plans to maintain product safety, quality and legality. Incidents may include: • disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications • events such as fire, flood or natural disaster • malicious contamination or sabotage • failure of, or attacks against, digital cyber-security. Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products.

1. CRISIS MANAGEMENT PLANNING/MANAGEMENT OF INCIDENTS

Nonconformity:

- Not having a plan
- Missing/outdated key information

1. CRISIS MANAGEMENT PLANNING/MANAGEMENT OF INCIDENTS

- Nonconformity:
  - Not having a plan

- Common Causes:
  - Many companies misinterpret the intent
    - They misinterpret it as part of the recall/withdrawal
    - The intent is to have a demonstratable plan for different disaster scenarios

1. CRISIS MANAGEMENT PLANNING/MANAGEMENT OF INCIDENTS

Solution:

- List potential dangers
  - Commonly thought of
    - Natural disasters- tornado
    - Fire
  - Not commonly thought of
    - Phone or utility interruptions (water, electricity)
    - Labor shortage
    - Warfare and civil unrest
    - Site specific issues
      - Flooding if near water, train wreck if near tracks etc.
- Write a summary of what should occur in that situation
  - Keep it short and simple
    - Example; Fire:

      In event of fire, production would cease and employees would evacuate to designated fire meeting sites. After event is over all product on line would be discarded, all stored materials would be accessed for damage.

1. CRISIS MANAGEMENT PLANNING/MANAGEMENT OF INCIDENTS

- Nonconformity:
  - Missing/outdated key information
- Common Causes:
  - Crisis Team member list
  - Member listed by name who is no longer there
  - Inaccurate contact information
- Solution:
  - Keep key information Accurate
    - Crisis Team member list
    - List members by name and position
    - Verify contact information

2. SUPPLIER APPROVAL

SQF	BRC
2.4.4	3.5
Approved Supplier Program	Supplier and Raw Material Approval and Performance Monitoring

2.4.4 Approved Supplier Program (Mandatory)

2.4.4.1 Raw materials, ingredients, packaging materials, and services that impact on finished product safety shall meet the agreed specification (refer to 2.3.2) and be supplied by an approved supplier.

2.4.4.2 The receipt of raw materials, ingredients, and packaging materials received from non-approved suppliers shall be acceptable only in an emergency situation, and provided they are inspected or analyzed before use.

2.4.4.3 The responsibility and procedure for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented.

2.4.4.4 The site's food defense plan (refer to 2.7.1.1) shall include measures to secure incoming materials and ingredients and protect them from deliberate act of sabotage or terrorist-like incidents.

2.4.4.5 The site's food fraud vulnerability assessment (refer to 2.7.2.1) shall include the site's susceptibility to raw material or ingredient substitution, mislabeling, dilution and counterfeiting which may adversely impact food safety.

2.4.4.6 The food fraud mitigation plan (refer to 2.7.2.2) shall include methods by which the identified food safety vulnerabilities from ingredients and materials shall be controlled.

2.4.4.7 Raw materials, ingredients, and packaging materials received from other facilities under the same corporate ownership, shall be subject to the same specification requirements (refer to 2.3.2) and approved supplier requirements as all other material providers.

2.4.4.8 The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum:

i. Agreed specifications (refer to 2.3.2);
ii. Reference to the rating of the level of risk applied to a raw material ingredients, packaging materials and services and the approved supplier;
iii. A summary of the food safety controls implemented by the approved supplier;
iv. Methods for granting approved supplier status;
v. Methods and frequency of monitoring approved suppliers;
vi. Details of the certificates of conformance if required; and
vii. Methods and frequency of reviewing approved supplier performance and status.

2.4.4.9 Supplier audits shall be based on risk and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

2.4.4.10 A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained.

3.5.1.2	The company shall have a documented supplier approval procedure to ensure that all suppliers of raw materials, including primary packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval procedure shall be based on risk and include either one or a combination of:
	• a valid certification to the applicable BRC Global Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased
	• supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. Where the supplier audit is completed by a second or third party, the company shall be able to:
	  • demonstrate the competency of the auditor
	  • confirm that the scope of the audit includes product safety, traceability, HACCP review and good manufacturing practices
	  • obtain and review a copy of the full audit report
	or
	• where a valid risk-based justification is provided and the supplier is assessed as low risk only, a completed supplier questionnaire may be used for initial approval. The questionnaire shall have a scope that includes product safety, traceability, HACCP review and good manufacturing practices, and it shall have been reviewed and verified by a demonstrably competent person.

3.5.1.3	There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented. Where approval is based on questionnaires, these shall be reissued at least every 3 years and suppliers shall be required to notify the site of any significant changes in the interim, including any change in certification status. Records of the review shall be kept.
3.5.1.4	The site shall have an up-to-date list or database of approved suppliers. This may be on paper (hard copy) or it may be controlled on an electronic system. The list or relevant components of the database shall be readily available to the relevant staff (e.g. at goods receipt).
3.5.1.5	Where raw materials (including primary packaging) are purchased from companies that are not the manufacturer, packer or consolidator (e.g. purchased from an agent, broker or wholesaler), the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material. Information to enable the approval of the manufacturer, packer or consolidator, as in clauses 3.5.1.1 and 3.5.1.2, shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is themselves certificated to a BRC Standard (e.g. BRC Global Standard for Agents and Brokers) or a standard benchmarked by GFSI.
3.5.1.6	The company shall ensure that its suppliers of raw materials (including primary packaging) have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test. Where a raw material is received directly from a farm or fish farm, further verification of the farm's traceability system is not mandatory.
3.5.1.7	The procedures shall define how exceptions to the supplier approval processes in clause 3.5.1.2 are handled (e.g. where raw material suppliers are prescribed by a customer) or where information for effective supplier approval is not available (e.g. bulk agricultural commodity products) and instead product testing is used to verify product quality and safety. When a site produces customer-branded product, the customer shall be made aware of the relevant exceptions.

2. SUPPLIER APPROVAL

Nonconformity:

- Not using approved suppliers
- Not having approved backup suppliers

These two are intimately linked, so we will discuss them together

2. SUPPLIER APPROVAL

Scenario:

Production has had an issue (say a spill of raw material) and is now short and needs restocked.

Production lets Purchasing know they need the item ASAP.

Purchasing finds their approved supplier, X, cannot meet the demand and sources elsewhere to fulfill production needs from a new supplier who is not on the approved list.

2. SUPPLIER APPROVAL

Solution:

- Having approved backup suppliers
- Having a positive partnership between Production, Purchasing and Quality

- NOTE 1: Having an approved back up not only would alleviate the issue of not using an approved supplier, but also ties in with Crisis Management in what to do if a supplier cannot supply.

- NOTE 2: Purchasing and Production need to be partnered with Quality on the initiative

- NOTE 3: Study the data if this is a repeat issue

3. INTERNAL AUDITS

SQF	BRC
2.5.5	3.4
Internal Audits and Inspections	Internal Audits

2.5.5 Internal Audits and Inspections (Mandatory)

2.5.5.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted at least annually. The methods applied shall ensure:

i. All applicable requirements of the SQF Food Safety Code for Manufacturing are audited as per the SQF audit checklist or similar tool;

ii. Correction and corrective action of deficiencies identified during the internal audits are undertaken;

iii. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions.

2.5.5.2 Staff conducting internal audits shall be trained and competent in internal audit procedures.

2.5.5.3 Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and building/equipment maintenance is compliant to the SQF Food Safety Code for Manufacturing. The site shall:

i. Take corrections or corrective and preventative action; and

ii. Maintain records of inspections and any corrective action taken.

2.5.5.4 Where practical staff conducting internal audits shall be independent of the function being audited.

2.5.5.5 Records of internal audits and inspections and any corrections and corrective action taken as a result of internal audits shall be maintained.

3.4.1	There shall be a scheduled programme of internal audits. At a minimum, the programme shall include at least four different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities shall be covered at least once each year. At a minimum, the scope of the internal audit programme shall include the: • HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification) • prerequisite programmes (e.g. hygiene, pest control) • food defence and food fraud prevention plans • procedures implemented to achieve the Standard. Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HACCP or food safety plan.
3.4.2	Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be independent (e.g. not audit their own work).
3.4.3	The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and include objective evidence of the findings. The results shall be reported to the personnel responsible for the activity audited. Corrective and preventive actions, and timescales for their implementation, shall be agreed and their completion verified.
3.4.4	In addition to the internal audit programme, there shall be a separate programme of documented inspections to ensure that the factory environment and processing equipment are maintained in a suitable condition for food production. At a minimum, these inspections shall include: • hygiene inspections to assess cleaning and housekeeping performance • fabrication inspections to identify risks to the product from the building or equipment. The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas.

3. INTERNAL AUDITS

Nonconformity

- Auditor not independent of function being audited
- BRC - Internal Audit not conducted at least four different audit dates per year

3. INTERNAL AUDITS

- Nonconformity:
  - Auditor not independent of function being audited
- Common Causes:
  - Employees wear multiple hats in smaller organizations
- Solution:
  - Large organizations: Using a cross functional team
  - Small organizations: Utilize external resources

3. INTERNAL AUDITS

BRC requirement relating to internal audit schedule:

3.4.1

There shall be a scheduled programme of internal audits.

At a minimum, the programme shall include at least four different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities shall be covered at least once each year.

At a minimum, the scope of the internal audit programme shall include the:

- HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification)
- prerequisite programmes (e.g. hygiene, pest control)
- food defence and food fraud prevention plans
- procedures implemented to achieve the Standard.

Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HACCP or food safety plan.

3. INTERNAL AUDITS

- Nonconformity
  - BRC - Internal Audit not conducted at least four different audit dates per year

- Solution
  - Do a risk assessment on each requirement/clause
  - Assign frequency of auditing of each area based on the risk assessment
  - Create a calendar and spread it out

3. INTERNAL AUDITS

EXAMPLE	January	Febuary	March	April	May	June	July	August	September	October	November	December
High Risk- Quarterly												
Medium Risk- 6 months												
Low Risk- Annually												

4. WALLS, PARTITIONS, DOORS & CEILINGS

SQF	BRC
11.2.3	4.4
Walls, Partitions, Doors and Ceilings	Building Fabric, Raw Material Handling, Preparation, Processing, Packing and Storage Areas

11.2.3 Walls, Partitions, Doors and Ceilings

11.2.3.1 Walls, partitions, ceilings and doors shall be of durable construction. Internal surfaces shall be smooth and impervious with a light-colored finish, and shall be kept clean (refer to 11.2.13.1).

11.2.3.2 Wall to wall and wall to floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

11.2.3.3 Ducting, conduit and pipes that convey services such as steam or water shall be designed and constructed to prevent the contamination of food, ingredients and food contact surfaces and allow ease of cleaning.

11.2.3.4 Pipes carrying sanitary waste or waste water that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients and food contact surfaces, and shall allow ease of cleaning.

11.2.3.5 Doors, hatches and windows and their frames in food processing, handing or storage areas shall be of a material and construction which meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction and windows shall be made of shatterproof glass or similar material.

11.2.3.6 Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products.

11.2.3.7 Drop ceilings shall be constructed to enable monitoring for pest activity, facilitate cleaning and provide access to utilities.

4.4.1	Walls shall be finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.
4.4.2	Floors shall be suitably hard-wearing to meet the demands of the process, and withstand cleaning materials and methods. They shall be impervious, be maintained in good repair and facilitate cleaning.
4.4.3	Drainage, where provided, shall be sited, designed and maintained to minimise risk of product contamination and not compromise product safety. Machinery and piping shall be arranged so that, wherever feasible, process waste water goes directly to drain. Where significant amounts of water are used, or direct piping to drain is not feasible, floors shall have adequate falls to cope with the flow of any water or effluent towards suitable drainage.
4.4.4	Ceilings and overheads shall be constructed, finished and maintained to prevent the risk of product contamination.
4.4.5	Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed.
4.4.6	Where elevated walkways are adjacent to or pass over production lines, they shall be: • designed to prevent contamination of products and production lines • easy to clean • correctly maintained.
4.4.7	Where there is a risk to product, windows and roof glazing which are designed to be opened for ventilation purposes shall be adequately screened to prevent the ingress of pests.
4.4.8	Doors (both internal and external) shall be maintained in good condition. At a minimum: • external doors and dock levellers shall be close fitting or adequately proofed • external doors to open product areas shall not be opened during production periods except in emergencies • where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.
4.4.9	Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.
4.4.10	Adequate ventilation and extraction shall be provided in product storage and processing environments to prevent condensation or excessive dust.

4. WALLS, PARTITIONS, DOORS & CEILINGS

Nonconformity

- Door damage/not fully closing

4. WALLS, PARTITIONS, DOORS & CEILINGS

- Nonconformity
  - Door damage /not fully closing

- Solution
  - Have Doors on internal inspections
  - Have Doors on routine maintenance schedule
  - For repeated damage evaluate why damage is occurring

5. EQUIPMENT, UTENSILS & PROTECTIVE CLOTHING

SQF	BRC	
11.2.9	4.6	7.4
Equipment, Utensils and Protective Clothing	Equipment	Protective Clothing….

11.2.9 Equipment, Utensils and Protective Clothing

11.2.9.1 Specifications for equipment, utensils and protective clothing, and procedures for purchasing equipment shall be documented and implemented.

11.2.9.2 Equipment and utensils shall be designed, constructed, installed, operated and maintained to meet any applicable regulatory requirements and not to pose a contamination threat to products.

11.2.9.3 Benches, tables, conveyors, mixers, mincers, graders and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious and free from cracks or crevices.

11.2.9.4 Product containers, tubs, bins for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious and readily cleaned as per 11.2.13. Bins used for inedible material shall be clearly identified.

11.2.9.5 Waste and overflow water from tubs, tanks and other equipment shall be discharged direct to the floor drainage system, and to meet local regulatory requirements.

11.2.9.6 Protective clothing shall be manufactured from material that will not contaminate food and is easily cleaned.

11.2.9.7 Racks shall be provided for the temporary storage of protective clothing when staff leaves the processing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.

11.2.9.8 All equipment, utensils and protective clothing shall be cleaned after use or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

4.6.1	All equipment shall be constructed of appropriate materials. The design and placement of equipment shall ensure it can be effectively cleaned and maintained.
4.6.2	Equipment that is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable.

7.4.1	The company shall document and communicate to all employees (including agency and temporary personnel), contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. production areas, storage areas etc.). This shall also include policies relating to the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, and use of canteen and smoking areas).
7.4.2	Protective clothing shall be available that: • is provided in sufficient numbers for each employee • is of suitable design to prevent contamination of the product (at a minimum containing no external pockets above the waist or sewn-on buttons) • fully contains all scalp hair to prevent product contamination • includes snoods for beards and moustaches, where required, to prevent product contamination.
7.4.3	Laundering of protective clothing shall take place by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure: • adequate segregation between dirty and cleaned clothes • effective cleaning of the protective clothing • cleaned clothes are supplied protected from contamination until use (e.g. by the use of covers or bags). Washing of protective clothing by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.
7.4.4	Protective clothing shall be changed at an appropriate frequency, based on risk.
7.4.5	If gloves are used, they shall be replaced regularly. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive colour (blue where possible), be intact and not shed loose fibres.
7.4.6	Where items of personal protective clothing that are not suitable for laundering are provided (such as chain mail, gloves and aprons), these shall be cleaned and sanitised at a frequency based on risk.

5. EQUIPMENT, UTENSILS & PROTECTIVE CLOTHING

Nonconformity

- Food in contact with surfaces not suitable for food contact
- Equipment and utensils in a condition that poses a threat to food safety

5. EQUIPMENT, UTENSILS & PROTECTIVE CLOTHING

- Nonconformity
  - Food in contact with surfaces not suitable for food contact
- Common Cause:
  - Material not intended for food contact (wood, porous material, belts that are not suitable)
- Solution:
  - Evaluate the material purchased
  - Using material that is certified as suitable for food contact
  - Use risk assessment

5. EQUIPMENT, UTENSILS & PROTECTIVE CLOTHING

- Nonconformity:
  - Equipment and utensils in a condition that poses a threat to food safety

- Solution:
  - Train employees to take action if undesirable conditions arise
  - Requires employees to be trained on what conditions are undesirable
  - Have back ups ready. Often an item is put to use to not lose production time while waiting on replacement

6. Control of Foreign Matter Contamination

BONUS

- Nonconformity:
  - Metal detector not rejecting product

- Solution:
  - The metal detector has to have a way to fully reject the suspect product, either by pushing it off, dropping it or line stop
  - This reject function must be verified.

7. Pest Prevention

BONUS

- Not having up to date license for provider

  It often expires and the contractor forgets to update it

- Not verifying contracted provider's work

  Making sure traps are opened as they say they are. If you always have a completely pest free facility, someone may be omitting something

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