Improve Your Audit Score: How to Prevent the Top 10 Audit Non-Conformances

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WEBINAR

Today's Speaker

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Agenda

- Audit Process and Significance

- Top 10 Non-Conformances and Ways To Prevent Them

- Steps To Take When Non-Conformances Are Found

- Best Practices for Ensuring Compliance

- Audit Preparation and Readiness

- Alchemy Solutions

- Questions?

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Audit Process and Significance

- Audits serve as an independent and unbiased evaluation of your Food Safety and Quality Systems

- Effective audits should help prevent foodborne illnesses and recalls

- Every audit should be viewed as a learning opportunity to improve

- Acceptable audit scores are necessary to meet customer requirements

- Trends in audit scores indicate improvements or issues

- Compensation is often linked to audit results

- Goal – Audit Ready, All The Time!

Audit Challenges

- Changing GFSI requirements
  - Updated GFSI Benchmarking
  - SQF Edition 8 effective 1/1/18
  - BRC Issue 8 effective 2/1/19
  - FSSC 22000 Issue 4.1 effective 1/1/18

- Unannounced audits

- Inconsistency amongst Auditors

- Personnel turnover and training

Top 10 Audit Non-Conformances & Prevention

Top 10 **Major** Non-Conformances (SQF Audits)

Clause	Description	Non-Conformance
2.7.2.1	Food Fraud	Program and Vulnerability Assessment
2.4.8.1	Environmental Monitoring	Risk-Based Program for ALL facilities
11.2.13.1	Cleaning and Sanitation	Program, Procedures and Effectiveness Verification
2.4.3.13	Food Safety Plan	CCP / PC Monitoring Procedure Methods/Frequency
11.2.12.2	Pest Prevention	Identified Pest Activity
11.7.6.2	Detection of Foreign Objects	Metal Detector Monitoring, Verification, Validation
2.5.5.1	Internal Audits and Inspections	SQF System Audits with Checklist; Annual Review
11.2.12.1	Pest Prevention	Pest Prevention Program Effective Implementation
2.5.1.1	Validation and Effectiveness	Validation of GMP's, Critical Limits and Changes
2.4.3.2	Food Safety Plan	Implementation & Monitoring;FS Control/Assurance

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Top 10 **Minor** Non-Conformances (SQF Audits)

Clause	Description	Non-Conformance
2.7.1.3	Food Defense	Challenge Test and Plan Review Annually
11.2.9.2	Equipment, Utensils & Protective Clothing	Equipment and Utensil Condition
11.4.1.1	Staff Engaged In Food Handling	Product Handling, Off Floor, Traffic, Waste, Eating
2.4.3.7	Food Safety Plan	Flow Diagram Completely and FST Verification
11.2.13.1	Cleaning and Sanitation	Program, Procedures and Effectiveness Verification
11.2.3.1	Walls, Partitions, Floors & Ceiling	Durable construction and kept clean
2.7.2.1	Food Fraud	Program and Vulnerability Assessment
2.2.3.2	Records	Legible and verified to show complete monitoring
2.1.3.2	Management Review	Monthly Practitioner Meetings; Annual SQF Review
11.2.7.1	Dust, Insect & Pest Proofing	Exterior doors and openings protected from pests

2.4.3 Food Safety Plan

- HACCP / Food Safety Team Training

- HACCP / Food Safety Team Meeting Schedule

- HACCP / Food Safety Plan Components – Product Description, Flow Chart, Hazard Analysis, HACCP / PC Plan Summaries

- Validation Data Supporting Documentation for CCP's and Hazards

- CCP Monitoring and Verification Personnel Interviews

- CCP Records

- Annual Review – recommend 3rd Party Reassessments

2.4.8 Environmental Monitoring Program

- Risk-Based Program = Documented Risk Assessment for potential hazards then assessment to determine which hazards to monitor

- Written Program to specify sampling and testing schedule, number of samples, and frequency of sampling

- Plant survey to determine sampling sites and frequency based on risk

- Sampling justification supported by regulatory, trade association or scientific guidelines

- Records for sampling and corrective actions

- Trend analysis of results

2.7.2 Food Fraud

- Written Food Fraud Program

- Documented Vulnerability Assessment of site and raw materials

- Documented Mitigation Plan to reduce risks

- Annual review and program updates as

- Correlation with FDA Food Safety Plan Hazard Analysis for EMA hazards

- Tools – PWC Vulnerability Assessment, Food Fraud Database, Horizon Scan for supporting documentation

2.7.1 Food Defense

- Senior Management Responsibility Defined

- Written Program to identify procedures for site access, employee access, storage, sensitive processing points, transportation

- New Requirement – Plan must be challenged at least annually

- Reviewed annually

11.2.9.1 and 2 Equipment and Utensils

- Equipment, conveyor belts and utensils maintained in acceptable condition and in a manner to prevent contamination

- New requirement for documented procedure for Purchasing Equipment, Materials and Protective Clothing to assure it is food grade and suitable for intended use

- Plant Internal Audit inspections should include the facility, equipment and utensils in addition to GMP Compliance, Product Handling and Product Labeling

- Use Preventive Maintenance Programs, Work Orders and Plant Improvement Programs to manage the processes

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Steps To Take For Non-Conformances

During The Audit

- Communicate closely with the Auditor to clearly understand the nature of the non-conformance

- Review the Standard Clause carefully to assess what is not in conformance with the requirement to agree or dispute with the auditor

- Take before and after pictures of non-compliant areas to include with corrective actions when required later

- Correct non-conformances as soon as possible and show the Auditor corrected areas to demonstrate commitment and sponsorship

- Ask the Auditor for an exit meeting each day to review results and assure agreement with nonconformances identified and ratings assessed at the final exit meeting

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After The Audit

- Work with your Food Safety Team to determine appropriate corrective actions to take for each non-conformance identified

- Investigate and determine the root cause of each non-conformance

- Complete a CAPA (Corrective Action and Preventive Action) record for each non-conformance

- Complete the Corrective Action Forms required by the Certification Body

- Submit corrective actions to the Certification Body preferably a week before the deadline but definitely by the deadline date

- Follow up with the Auditor to assure the non-conformances are closed

- Appeal if warranted
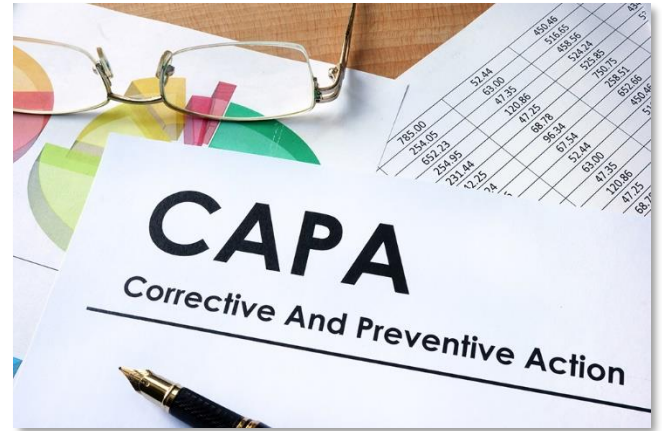
Best Practices for Ensuring Compliance

Know The Standard Requirements

- Be familiar with the standard you are being audited to

- Pay particular attention to updated / new program requirements

- Take training where needed to meet requirements or raise awareness such as HACCP Training, Implementing SQF, SQF Quality Course, SPC Training etc

- Learn from the Standard Owner and others experience

Effective Internal Audit Processes

- Create an Internal Audit Team and train your Internal Auditors

- Create an Internal Audit Schedule

- Complete a clause by clause Gap Analysis or Internal Audit using the standard checklist

- Complete a Corrective Action Register for non-compliant areas

- Complete a detailed Plant Inspection to assess readiness with pictures; Interview employees during Internal Audits

- Report Internal Audit Results to Senior Management to prompt action

- Assure there are not any surprises during the audit

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Food Safety Plan

- Be certain your Food Safety Plan is fully implemented and validated
  - Complete and verified Flow Diagram
  - Correct Hazard Analysis with all hazards identified and assessed
  - Correct CCP or Preventive Control Steps identified for Process, Allergens, Sanitation and Supply Chain

- Complete Food Safety Plan Reassessments at least annually and when necessary for CCP failures, significant changes, unanticipated hazards or when new information becomes available

- Complete HACCP / Food Safety Plan Validation with sufficient supporting documentation available for review

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Audit Preparation and Readiness

Audit Preparation

- Complete SQF, HACCP and GMP Awareness Training with all employees

- Conduct a HACCP / Food Safety Team Meeting the week prior to the audit

- Complete a detailed Plant Inspection, address any employee, equipment, sanitation and maintenance issues identified

- Inspect all equipment, conveyor belts for frayed edges and utensils

- Remove any mobile unused equipment from production areas

- Schedule the Pest Control Operator for an inspection the day prior

- Check storage areas for proper housekeeping and allergen segregation

- Schedule products with minimal waste and ease of processing

Personnel Coaching

- Prepare employees for interviews by education them on how to answer questions

- Auditor will interview QA Technicians, CCP / PC Personnel, Line Operators, Supervisors, Maintenance, Sanitation, Receiving, Shipping and others

- Assure employees are competent to explain their responsibilities and review any records they complete as part of their job

- Assure all employees can explain the following:
  - What is the standard being audited?
  - GMP requirements for handwashing, glove use, product handling, etc.
  - Job specific responsibilities

During The Audit

- Demonstrate sponsorship at the Exit and Closing Meetings with attendance by senior management and each departmental manager

- Run lines at appropriate speeds for effective proper product handling, housekeeping and sanitation, and have extra sanitation personnel monitoring

- Have an advance team inspecting ahead of the auditor

- Have a key QA, Operations, Maintenance and Sanitation representative accompany the audit team during inspections

- Assure proper product and allergen handling / labeling in all areas

- Do not allow Contractor's in the plant on audit days

- Take pictures and detailed notes of any non-conformances identified

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Alchemy Solutions

Provide Engaging Training

- Create content in employee's primary language

- Base content on employee's role (HACCP, GMPs, GAPs)

- Ensure comprehension with open discussions and educational games

Familiar, site-specific images increase relevance for workers and improve comprehension.

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Reinforce Critical Concepts

Mobile Coach App

- Increase supervisor/employee interaction & communication
- Validate employee understanding

Huddle Talk Guides

- Blueprint to engage & instruct workers
- Time-saving tool for supervisors & trainers

Digital Signage

- Reinforce key training topics
- Improve control & message quality to entire company

Coordinated Posters

- Reinforce discussion topics with strategically placed posters
- Make an emotional impact

Ensure Audit-Readiness

Leverage technology to verify:

- **Training attendance**

- **Training comprehension**

- **Correct application of training**

- **On-the-floor reinforcement and corrective actions**

Eliminate time-consuming record keeping!

Alchemy's Consulting Solutions

✓ **SQF, BRC and FSSC 22000 Consulting** – Gap Analysis, Program Development, Internal Audits, Audit Support

✓ **HACCP Plan / Food Safety Plan Reassessment** – Receive a detailed review of your HACCP system to verify accuracy and effectiveness

✓ **HACCP Plan / Food Safety Plan Validation** – Receive scientific and/or in-plant data to verify the effectiveness of your HACCP Plan

✓ **Food Safety Training** – On-site Basic HACCP, Advanced HACCP, Preventive Control for Human Food, Preventive Control for Animal Food, Internal Auditor Training

100% Client Satisfaction Rate

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- Teaches you how to develop & implement an effective food safety plan based on CODEX HACCP specifications, which is required by the four major GFSI schemes

    – **SQF, BRC, FSSC 22000, and IFS**

Learn more at: **https://academy.alchemysystems.com/product-category/courses-exams/haccp/**

THANK YOU

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