

SQF Top 10 Non-Conformances and How to Avoid Them

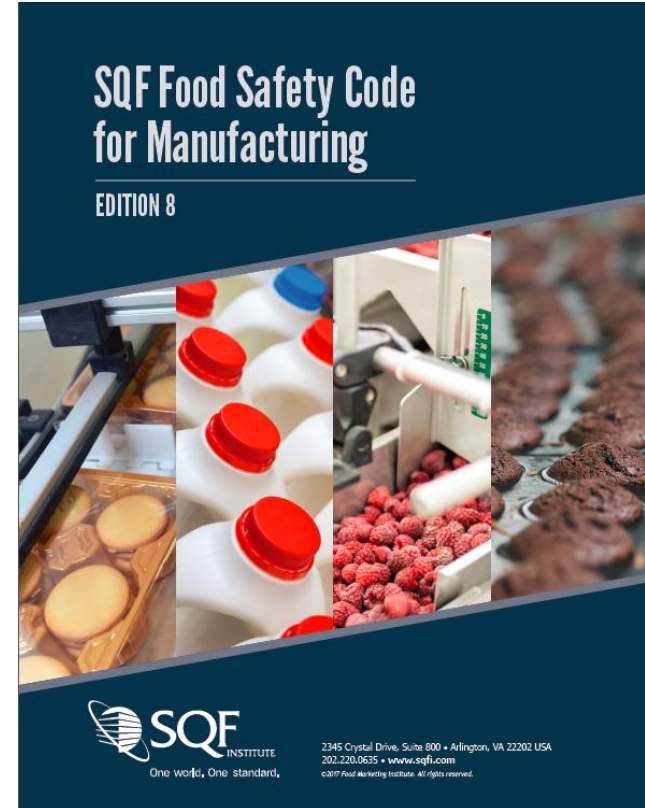
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Objectives

- Explore the non-conformances from the SQF program from 2017 (V 7.2) to 2018 (V 8.0)
- Examine the non-conformances observed during unannounced vs. announced audits
- Discuss lessons learned from review of data
- Describe best practices to avoid the most common non-conformances

Review of the Data

- V8 effective Jan 2nd, 2018
- V8 split out quality from food safety, this data is from the food safety standard
- 2018 was last year for many to have unannounced audit in their initial 3 year cycle since the implementation of unannounced audits by SQF in 2015
- Roughly 6000 audits done to V8



Minor

Major

Bold – new to list

Clause	Description	Clause	Description
2.7.1.3	Food defense plan	2.7.2.1	Food fraud program
11.2.9.2	Equipment, utensils and clothing	2.4.8.1	Environmental monitoring
11.4.1.1	Staff engaged in food handling	11.2.13.1	Cleaning and sanitation
2.7.2.1	Food fraud program	2.4.3.2	Food safety plan
11.2.13.1	Cleaning and sanitation	2.5.1.1	Validation and effectiveness
11.2.3.1	Walls, floors and ceilings	2.5.5.1	Internal audits and inspections
2.4.3.7	Food safety plan	2.4.3.13	Food safety plan monitoring
2.2.3.2	Records	11.2.12.2	Identified pest activity risk
11.2.2.1	Floors, drains and waste traps	11.2.10.1	Maintenance program
2.1.3.2	Management review	11.7.6.2	Metal detector management

Minor

Major

Bold –dropped off list

Clause	Description	Clause	Description
2.4.3.1	Food safety plan	2.4.3.1	Food safety plan
11.2.12.1	Equipment, utensils and clothing	2.8.2.1	Allergen management
11.4.1.1	Staff engaged in food handling	11.2.11.1	Management of pests and vermin
11.2.13.1	Cleaning and sanitation	2.5.7.1	Internal audits
11.2.3.1	Walls, floors and ceilings	11.7.6.2	Detection of foreign objects (MD)
2.2.2.2	Records	11.2.13.1	Cleaning and sanitation
11.2.2.1	Floors, drains and waste traps	2.5.2.1	Validation and effectiveness
11.7.5.3	Temporary repairs	2.4.2.1	Food safety fundamentals
11.2.7.1	Dust, fly and vermin proofing	2.4.1.1	Food Legislation
2.5.7.1	Internal audits	2.2.2.2	Records

What Do We Learn From Reviewing 2017 vs. 2018 Data?

- New requirements in V8
 - Food fraud
 - Food defense
 - Enhanced environmental monitoring
- Still struggle with some well established programs
 - Food safety plan
 - Internal audits
 - Management of records
- Still have physical challenges with food plants
 - Poor repair of equipment and utensils
 - Floors, walls and ceilings pose a risk to the product or process
- Some good news
 - We learned FSMA and identified PCQIs
 - Management of temporary repairs
 - More familiar with allergen management
 - We are closing the doors

Announced

Unannounced

Clause	Description	Clause	Description
11.2.13.1	Cleaning and sanitation	11.2.13.1	Cleaning and sanitation
11.2.12.1	Equipment, utensils and clothing	11.2.12.1	Equipment, utensils and clothing
11.2.3.1	Walls, floors and ceilings	11.7.5.3	Temporary repairs
2.4.3.1	Food safety plan	11.2.3.1	Walls, ceilings and doors
11.2.2.1	Floors, drains and waste traps	11.2.2.1	Floors, drains and waste traps
11.2.9.2	Maintenance – emergency repairs	11.2.9.2	Maintenance – emergency repairs
11.7.5.3	Temporary repairs	2.4.3.1	Food safety plan
11.4.1.1	Staff engaged in food handling	11.4.1.1	Staff engaged in food handling
11.2.7.1	Dust, fly and vermin proofing	11.2.7.1	Dust, fly and vermin proofing

Minor non-conformances

Announced

Unannounced

Clause	Description	Clause	Description
11.2.9.2	Equipment, utensils and clothing	11.2.9.2	Equipment, utensils and clothing
11.2.2.1	Floors, drains and waste traps	11.2.2.1	Floors, drains and waste traps
11.2.7.1	Outer openings protected	11.2.13.1	Cleaning and sanitation
11.2.13.1	Cleaning and sanitation	11.2.3.1	Walls, floors and ceilings
11.2.3.1	Walls, floors and ceilings	11.4.1.1	Staff engaged in food handling
2.2.3.2	Records	2.4.3.7	Food safety plan – flow diagram
11.4.1.1	Staff engaged in food handling	2.7.1.3	Food defense plan annual review
2.4.3.7	Food safety plan – flow diagram	2.7.2.1	Food fraud plan
2.7.2.1	Food fraud plan	2.8.1.1	Allergen management
2.7.1.3	Food defense plan annual review	2.2.3.2	Records

Bold = unique

Announced

Unannounced

Clause	Description	Clause	Description
2.8.2.1	Allergen management	2.8.2.1	Allergen management
11.7.6.2	Metal detector management	11.2.13.1	Cleaning and sanitation
11.7.5.4	Glass and brittle plastic	2.4.3.1	Food safety plan
11.2.11.1	Pest management program	2.1.4.3	Program review requirements
11.2.13.1	Cleaning and sanitation	2.1.2.5	SQF Practitioner qualified
2.5.7.1	Internal audit program	11.7.6.2	Metal detector management
2.4.1.1	Food legislation	11.7.4.1	High risk food processing
2.4.3.1	Food safety plan	2.5.7.1	Internal audit program

Announced

Unannounced

Clause	Description	Clause	Description
2.5.1.1	Validation and effectiveness	11.2.9.2	Equipment, utensils and clothing
11.2.12.2	Identified pest activity	11.2.12.5	Inspections for pest activity
2.4.8.1	Environmental monitoring plan	11.7.5.1	Foreign material control program
2.5.5.1	Internal audit program	2.4.4.5	Food fraud raw material review
2.4.3.13	Monitoring of food safety plan	2.4.3.2	Food safety plan implemented
2.4.3.12	CCP critical limits	2.7.2.1	Food fraud plan
2.7.2.1	Food fraud plan	2.4.8.1	Environmental monitoring plan
11.2.13.1	Cleaning and sanitation	2.4.8.1	Environmental monitoring plan - pets
11.2.10.1	Maintenance program	2.4.6.2	Records of reworking are maintained
2.4.3.2	Food safety plan implemented		Bold = Unique to Unannounced Audits

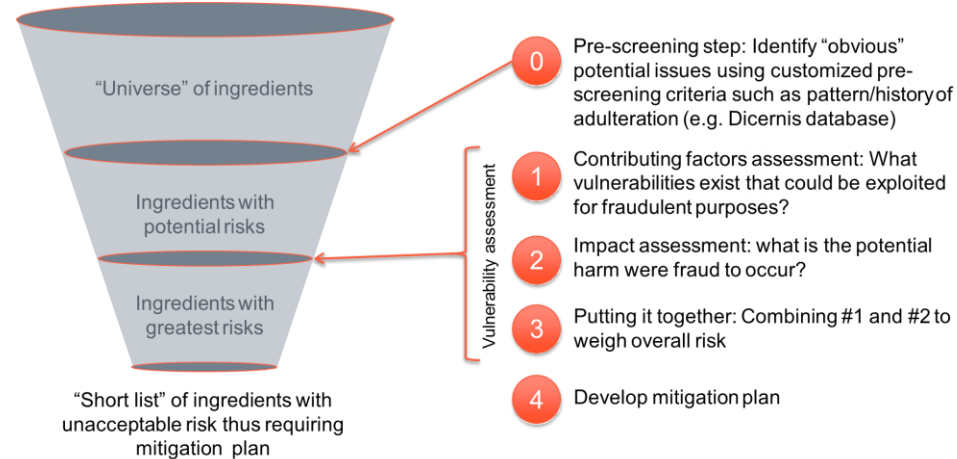
Review of Data From Announced vs. Unannounced Audits

- In 2018, roughly 20% of audits were unannounced
- For minor NCs, only outer openings protection and allergen management are different
- Major NCs – much more difference seen between audits
 - Announced audits showed more Major NCs for programs
 - Unannounced audits showed more Major NCs for observations

#1 - Learn the new requirements of V8

Food Fraud (2.7.2)

- Methods, responsibility and criteria for food fraud development
- Document vulnerability assessment
- Document mitigation plan
- Annual review of program
- Records



#1 - Learn the new requirements of V8

Food Defense (2.7.1)

- Identify senior management responsible for program
- Methods for authorized personnel to key access points
- Methods to protect sensitive processing points
- Measures to secure of raw materials and packaging
- Measures to secure during storage and transportation
- Methods to control access to facility
- Reviewed annually
- Records

#1 - Learn the new requirements of V8

Environmental Monitoring (2.4.8)

- Risk based program for food and pet food
- Responsibilities and methods documented
- Sampling and testing schedule with target organisms, number of samples and frequency
- Records, corrective actions and trends



#2 – Management of Food Safety Plan

- HACCP team refresher training
- Review supporting documents during annual check
 - Process flow chart, hazard analysis, product description
- Annual review – use an outside set of eyes
- All CCPs must be validated
- Question employees during internal audit at all CCP monitoring stations



#3 – Condition of Facility, Equipment & Utensils

- Preventative maintenance schedule
- Use Plant Improvement Plan (PIP) system
- Focus internal audit program on equipment, not just employees
- Use flashlight when conducting internal audits
- Train and empower production employees to identify defects, rewards
- System for temporary repairs



#4 – Strong Internal Audit Program

- Include as many from your facility in the program as possible
- Manage all non-conformances with a corrective action program
- Take photos of all findings during internal audits
- Question your employees during your internal audit; get them accustomed to answering questions
- Focus on the facility, not just the employees
- Perform some of audit announced, have some to be unannounced
- Make the process as formal as possible
- Remember the audit is beyond your normal job, you must schedule and complete it separately from your “job”

- Reviewing data from year over year shows many elements are similar in non-conformance, such as food safety plans as well as facility physical challenges
- New criteria of food fraud, food defense and environmental monitoring provide new opportunities for improvement
- Keys to successful performance on SQF audits include a strong internal audit program, learning the new requirements and focusing on all employees role in the management of the food safety management plan

Thanks and Good Luck!

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