Specific Aspects of Food Safety Auditing
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Contents

• Review auditing principles and practices
• Specific aspects of food safety auditing
• Notes and guidance on how compliance may look
• Discussion
• Auditing Assignment
What is an audit?

The systematic, independent and documented process for obtaining:

• Audit evidence

• And evaluating it objectively to determine the extent to which the audit criteria are fulfilled
Essential

Standard

Competent Auditor

Auditing
Standard

• Legal Regulations, Directives and Legal Instruments
• GFSI, e.g. BRC, SQF, ISO 22000, IFS
• National Standards
• Voluntary Standards, e.g. Quality Assurance Schemes
• Trade Standards
• Internal Standards
Competent Auditor

- Trained
- Qualified
- Experienced
- Knowledgeable
- Personal skills and attributes
- Protocol
GUIDANCE ON FOOD SAFETY AUDITING
Objectives

- What are the objectives of food safety auditing?
- General – compliance or non-compliance
- Specific – to determine if a food operation is capable of producing safe food products
- Based on evidence – audit or inspection evidence
- What might this evidence look like?
Things to consider

- Risk based approach
- What product(s) are being produced?
- What quantities are being produced?
- What hazards are typically associated with the product, industry, business?
- Who might consume the product?
- Are there any recent out-breaks or alerts reported?
- Management capabilities
- Structural hygiene standards
- Operational hygiene standards
- Criteria: Regulatory / COP / Voluntary
- Size of premises / complexity of operation
Risk Assessment

Frequency × Adverse Impact = Risk
How is risk assessment applied in food safety auditing?

- Preparation
- Research
- Experience
- Knowledge of the product and process
- Education
- Networks
- Supports
- Using the standard[s], technical specifications and guidance notes that are available and refer to them and depend upon them
Trust but verify – guiding principle of the food safety auditor

Trust but verify

- Trust the information provided by the auditee
- Assume it represents the true picture and position of the company
- But seek objective evidence to support this
- Establish this principle early on in the audit
- Auditee will quickly understand how the audit will be conducted and will therefore be more accurate in the information provided

“Show me...”

- This will be the initiation of the verification process
- “Show me your customer complaints records...”
- “Show me how you check the metal detector...“
- “Show me how this CCP is monitored...“
GUIDANCE ON HACCP
HACCP - General

- HACCP studies based on the actual process and product
- Generic studies should be challenged
- The number and structure of HACCP studies should be logical and be capable of covering the main hazards
- E.g. One HACCP study covering 60 products made on 6 production lines with 40 recipes
  - “How was the HACCP system developed?”
  - “Was external expertise used and who has ownership now?”
  - “Have you had any problems with the HACCP system recently?”
- Good questions to ask at the beginning of the audit
HACCP - Team

- List or register of team members
- Should clearly state the Team Leader
- Names, roles, positions
- Cross functional – technical, production, engineering
- Evidence of competency – HACCP training certificates
- Team Leader: C.V. or detailed account of experience
- Team Leader: External HACCP course certificate and also scope of training, what exactly was the training?
- Team Leader: Demonstrate knowledge via questions...
- External Expertise: C.V. for external specialist on file? Are they on the approved suppliers list?
HACCP – Scope / Data / Flow

• Take a look at the HACCP Study
• Is it documented and clear?
• Check that the scope has been defined
• Product Data Sheet: All the relevant information documented, e.g. Composition, shelf-life, storage conditions
• Product Data Sheet: Intended use [ready-to-eat] and abuse covered, population groups and sub-groups – consistent with the scope
• Flow Diagrams: check they are clear, cover all steps, recycling loops, external facilities, key info, etc.
• High Risk / High Care: Flow diagrams indicate physical barriers?
• Verified? By production – maybe signed off by staff?
• Are CCP’s listed on the flow?
HACCP – Hazards / Control Measures

• Hazard Identification – specific hazards mentioned, e.g. ‘Foreign body’ is not as good as ‘glass’, ‘wood’, etc. and should be relevant to the operation

• Physical, chemical and microbiological

• Hazard Analysis – ask for documented records of the analysis and supporting documentation, e.g. Reference sources

• Control Measures – are they specific, e.g. Pest Control, Glass Audits etc.

• Look at grouping of HACCP studies – make sure they cover all hazards, e.g. Company makes two products that are similar but one has a difference recipe, e.g. Use of chemical preservative, different pH, different portion size, different cooking temperature
HACCP – CCP’s

- Table or work sheet showing application of CODEX, i.e. Decision tree for each process step
- Look for notes explaining / justifying decisions taken
- Why is this point a CCP or NOT a CCP?
- Critical Limits: Challenge if required?
- Are they clearly stated - tolerances?
- Are they measureable?
- Are they validated – “how, who, show me...?”
- How many CCP’s in the plan?
- Monitoring measures – are they capable of doing the job?
HACCP – Corrective Actions / Verification / Review

• Are corrective actions clearly defined?
• “Reject” may not be sufficient

• Evidence of clearly defined corrective actions: “Stop production. Hold product from last in-control check. Inform QA. Sample each batch using sampling plan ‘A’. Send samples to external laboratory for pathogen testing. If positive reject and conduct investigation. If negative, release product....”

• “Show me the records for recent CCP corrective actions”

• Verification - Evidence of internal audits, review of customer complaints, micro test reports, external specialist review.

• HACCP Review:
  • “When was your last HACCP review conducted?”
  • “Show me your latest HACCP Review report”
GUIDANCE ON QUALITY MANAGEMENT SYSTEMS
Food Safety Management (FSM) - General

• Compliance will be based on the totality of the audit evidence

• Quality Policy Statement: Signed copy, posted, signed by staff members after training

• Legal: Registration Certificate from Regulatory Body on file

• Legal: Copies of Reg’s on file and referenced in Manual[s]

• Quality Manual: Is it available? Check the contents page for the scope
FSM - Team

- Structure – organisational chart in place
- Where does the key food safety person appear in the structure?
- Responsibility & Accountability – Signed off job descriptions for Key Persons
- Job descriptions for all employees – do they cover food safety, hygiene and CCP’s for example? Are they signed off?
- Legal Updates: who is responsible? How does it work?
- Quality Objectives: Check these are documented and are current.
  - “Reduce complaints by 10% in 2013”
  - “Review HACCP system by end September 2014”
  - “Upgrade high care room – Capex Target June 2014”
- Management Review – Minutes, signed, dated, actions, etc.
FSM – Customer Focus

• Product specifications in place, up-to-date, signed off
• Customer surveys and questionnaires
• Performance targets, e.g. Complaints per ‘000
FSM – Management Review

• Is the process formal?
• Procedure in place
• Set frequency
• Include senior managers
• Agenda pre-defined
• Are notes taken, i.e. Minutes
• What are the key inputs, e.g. Customer complaints
• “Show me what actions were decided to deal with complaints...”
• Look for evidence that actions from previous meetings were reviewed
FSM – Resource Provision

• Technical skills on site – evidence might include qualified food technologist

• If not, is there evidence of an external specialist employed as required. Evidence – documented, including name, company, details of qualification
FSM – Supplier / Raw Material Control

- Seek evidence of an effective control procedure
- Approved Suppliers List (ASL)
- Is there a risk assessment in place? Show me...
- Supplier history
- Number of ingredients used / number of products
- History of the supplier ... Records
- How are suppliers categorised and rated? High / Low Risk?
- What checks are conducted ... If any? Retention of samples?
- Are audits conducted.... Reports?
- Non-conformance reports
- Signed off specifications (One or both parties?)
- Stock rotation FIFO or FIFU?
- Contract facilities and how are they controlled?
FSM – Document Control

• Ask for Document Control procedure
• Is there a master list of approved documents with current revision?
• Are responsibilities defined?
• Look at some documents and check if there is evidence of control
• Check if the CCP procedures are available at the CCP location and other important operations, e.g. Weight control, recipes and mixing instructions
• Ask about retention time – relate back to shelf life in HACCP documents
• Standard Operating Procedure (SOP’s) and work instructions
FSM – Record Control

• Ask to see the Record Control procedure
• Is there a master list of approved records with current revision?
• Are records available and stored correctly?
• Things to look for:
  • Records are complete
  • Clearly filled in
  • Authentic
  • Signed-off
  • Indicate corrective actions / out of control conditions
  • Contain the specification and tolerances of any checks / testing
FSM – Corrective Action

• Procedure in place
• Does the procedure define when and at what level corrective actions are required, e.g. Risk
• Who is responsible?
• Where are actions recorded?
• Minor or non-critical recorded on check form, e.g. Adjustment to filler
• Major and Critical – dedicated form?
• Are they reviewed?
• Check they are an input into Management Review process
FSM – Traceability

- Traceability of product from a finished item back to...
- Process conditions
- Raw materials [Batch of ingredients, packaging, in-process]
- Suppliers
- All quantities should be checked – reconciliations and mass balance
- The time taken should be looked at – in a crises situation it should not take 2-3 days
- Review records of company’s own internal traceability audit
- Frequency: minimum of 6 months
FSM – Traceability

• In the warehouse select a product (base on risk, what is available, quantity, brand, scope)
• Note the product, brand, batch number, durability information, D.O.M, etc.
• Go back to the office...request all relevant records...it will take time to gather these so ideally one member of staff will do this while you proceed with the audit with the key manager
• Production records for batch number...clear link to batch number
• Batch make up / recipe sheets. [Quantity / Mass Balance]
• Material incoming and check records [Quantity / Mass Balance]
• Audit record for supplier[s]
• Raw material specifications
FSM – Traceability

- Approved Suppliers List
- Final product specification
- Final product checks and quantities produced
- Order and delivery records linked to batch number
- Supplier and customer contact details
- Supplier audits and questionnaires
- Take detailed notes
- Farm and grower records should be included where relevant
FSM – Incidents / Product Recall

• Procedure
• Risk assessment – classification of incidents, etc.
• Look at contact register – regulatory bodies, customers, media
• Communication plan is defined
• Team – named with responsibilities
• Mock recall program – check reports
FSM – Customer Complaints

• Procedure
• Review records
• Look at the type of complaints, nature, frequency
• This may be conducted early in the audit – to provide audit leads
• Are complaints classified according to risk
• Are actions defined for these – review
• Is there a complaints log in place – clear referencing?
• Report generated for management
• Trending and analysis (Pareto)
GUIDANCE ON PREREQUISITE PROGRAMS (PRP’S)
PRP’s – Pest Control

- Ask how and who manages pest control
- Review Contractor’s manual
- In particular, focus on the specification / scope of the service provided
- Rodents, flying insects, crawling insects, birds, etc.
- Inspection scope: bait points, efk’s, servicing, cleaning, re-baiting, reporting
- Look at site map and check all points of monitoring
- Review field biologists latest report and check follow-up
- Examine procedure for follow-up inspections after bait take
- Focus on dead-zones and poorly accessible places
- Contractor’s credentials
PRP’s – Pest Control

- Check bait points on walk around – location, security, type, I.D.
- Check EFK’s – location, function, ask for records of bulb changes and specification
- Is there a risk assessment on the measures employed?
- Door and premises proofing
- Review inspection reports, action reporting
- Analysis reports – trending
PRP’s - Maintenance

• Preventive schedule based on risk assessment of equipment
• Schedule for premises
• Records should be reviewed
• Control procedures for how maintenance is conducted
• Seek physical evidence during walk around
• Typical examples are flaking paint, damage to walls & floors, drainage, tape engineering, tool control, chemicals, lubricant, missing machine panels
• Personnel
• Control for cleaning and release of equipment into production
PRP’s - Calibration

• Calibration plan
• Note 1 or 2 inspection equipment items – serial number, calibration dates, etc.
• Check internal calibration checks
• Temperature probes: Internal checks and external calibrations
• Traceability to national standards – calibration certificates
• CCP equipment calibration check frequency should be reviewed during audit
PRP’s - Cleaning Program

- Check there is a program in place – and it is adequate
- Focus on contract cleaners if applicable – control
- Cleaning procedures and training of staff
- Verification of cleaning program
- Chemical verification
- Risk assessment as basis of program and procedures
- Safety data sheets and COSHH
- Appropriateness of chemicals employed
- Cleaning-in-place [CIP]
- Records
PRP’s - Transport

- Check all suppliers are on the ASL
- Check Code of Practice / Contract is in place and signed off
- In-house fleet – maintenance and cleaning programs
- Look for records of checks conducted on delivery vehicle (in-coming and out-going)
- Temperature control: Incoming temperature checks, data logging, specifications for same
- Procedure for loading and unloading
- Security and over-night delivery
- Breakdown procedures
PRP’s – Medical Screening

• New employee records
• Return to work
• Visitors and contractors
• Illness reporting procedure – evidence that staff are aware of it – signed off
PRP’s - Equipment

• Specification on file for equipment in use
• Suitable for food applications – i.e. Food grade
• Capable of being cleaned
PRP’s – Employee Facilities

- Check appropriate facilities are in place for staff
- Canteens and rest areas
- Toilets
- Locker rooms
- Separation of facilities based on the risk of the activities
- Laundering facilities and services
- Personal item facilities
- Inspect the flow of staff facilities leading to ingress into production
- Recourse to external
- Segregation of protective clothing and personal
- Segregation of toilet facilities
PRP’s – Employee Facilities

• Observe work practices – jewellery, movement, protective clothing, hand-washing, etc.
• Check WHB units – temperature, time, operation, facilities
• Food storage facilities for staff
• Hair protection and glove control
• Colour coding for high risk operations
• Swabbing results for overalls – high risk
• Hand sanitizers – identification
• Control of external laundry providers
• Logical of donning procedure
PRP’s - Waste

• Look for accumulation of waste
• Covers on external storage containers
• Housekeeping in waste areas
• Containers for waste are specified for the purpose
• Movement of waste – high risk to low risk
• Clear identification of specific waste types
• Identification of sewage flow and risk
PRP’s – Personal Hygiene

- Hand Washing – procedure in place and posted
- Hand swabbing results – records
- Hand sanitizers
- Personal Hygiene – check rules are in place and signed off by staff
- Plaster Control – metal detectable, colour use of gloves, accounting
- Jewellery policy – check and observe
PRP’s – Process / Product Control

- Spend time looking at process control records
- Challenge what is done - where claims are important
- Seek deviations in the process and follow through to conclusion
- Positive release aspects
- Temperature control requirements
- Cooking – multipoint validation
- pH / acidification – validation against target pathogen
- Temperature controlled storage – validation, hot spots
- Packaging controls – MAP, etc.
- Allergen control measures
- Free-from controls if applicable
- Foreign body control measures
PRP’s – Glass / Hard Plastics

• Determine if there is a register
• Review audit reports
• Review actions and controls:
  • “Explain the breakage procedure”
  • “Explain procedure if glass breakage occurs during filling or packing”
PRP's - Wood

- Look for evidence of poor storage practices and condition of wooden pallets
- What is the policy on wood and wooden pallets
- Are there exclusion areas?
- Look for the wooden handled brushes, etc. in production areas
PRP’s – Metal / Other

- On-line metal detection units
- Start-up checks – last off checks, etc.
- Sensitivity
- Alarm
- Reject
- Ask operator to demonstrate the various checks
- Knife and utensil control
- Staples
- Sieves
- Plastic packaging
- Cardboard
- Dirt / Debris / etc.
PRP’s - Testing

• Testing plans, schedules
• Review testing methods
• Are procedures in place
• External laboratory: ILAB accreditation and scope of accreditation on file and available
• Review laboratory reports – reviewed by competent staff member and signed off, actions are recorded
PRP’s – Water and Services

- Risk assessment
- Source – controls
- Legionella
- Potability – look at test results
- Do not forget Ice and Steam
- Water treatment and storage – risk assessment
PRP’s – Labelling / Coding / Weight / Volume

• Labels and printed coded material retention
• Checked and signed-off
• Code generation system
• Verification of bar-codes and other coded data
• Durability data – Best before / Use by end, etc.
• Weight / volume checks – legal requirements, sampling plans for average weight, min weight, multi-packs
• Automation – check procedures, packs, TNE, T1, T2
PRP’s - Training

• Training Plan – review
• Select a number of staff members, e.g. CCP monitors
• Review training records and note details in your report
• Certificates
• Signed records
• Induction training program
• Formal training
• Follow-up on training
• Training scope
PRP’s – External Factory Standards

• Established during walk-around
• Check site security – perimeter fence, controlled access to site and factory
• External Proofing
• Site conditions – redundant machinery, hard margins, external storage, planted areas
PRP’s – Premises Design

- Check for proper and logical flow – based on risk
- Interfaces between high and low risk stages of operation
- Interlocking doors, hatches, door closing
- Floor drainage
- Walkways
- Windows
- Doors
- Lighting
- Ventilation / Extraction
- Air filtration and system
- Temperature control rooms
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Safefood 360°

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• It is widely used by food manufacturers around the world as a more effective and efficient alternative to paper based systems
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