



EAGLE Certification Group
SERVICE • INTEGRITY • VALUE

Common Pitfalls While Attaining SQF Certification

Vernon Edwards | Lead Auditor

Presenter:

☐ Vernon Edwards MS CQA

- ☐ 20 Years of Food Experience
- ☐ 4 Years as a Lead Auditor
- ☐ 3 Years Leading the Supplier Auditing function for Wells Enterprises



Agenda

- Assumptions
- Review Nonconformance Trends
 - Look at top NCRs assessed in Certification Audits at EAGLE Certification Group
 - Review and understand the requirements
- Discuss Common Mistakes and Potential Solutions
 - Questions and Answers





**THE JOURNEY OF
A THOUSAND
MILES BEGINS WITH
ONE STEP.**

- LAO TZU

QUOTESPEDIA.ORG

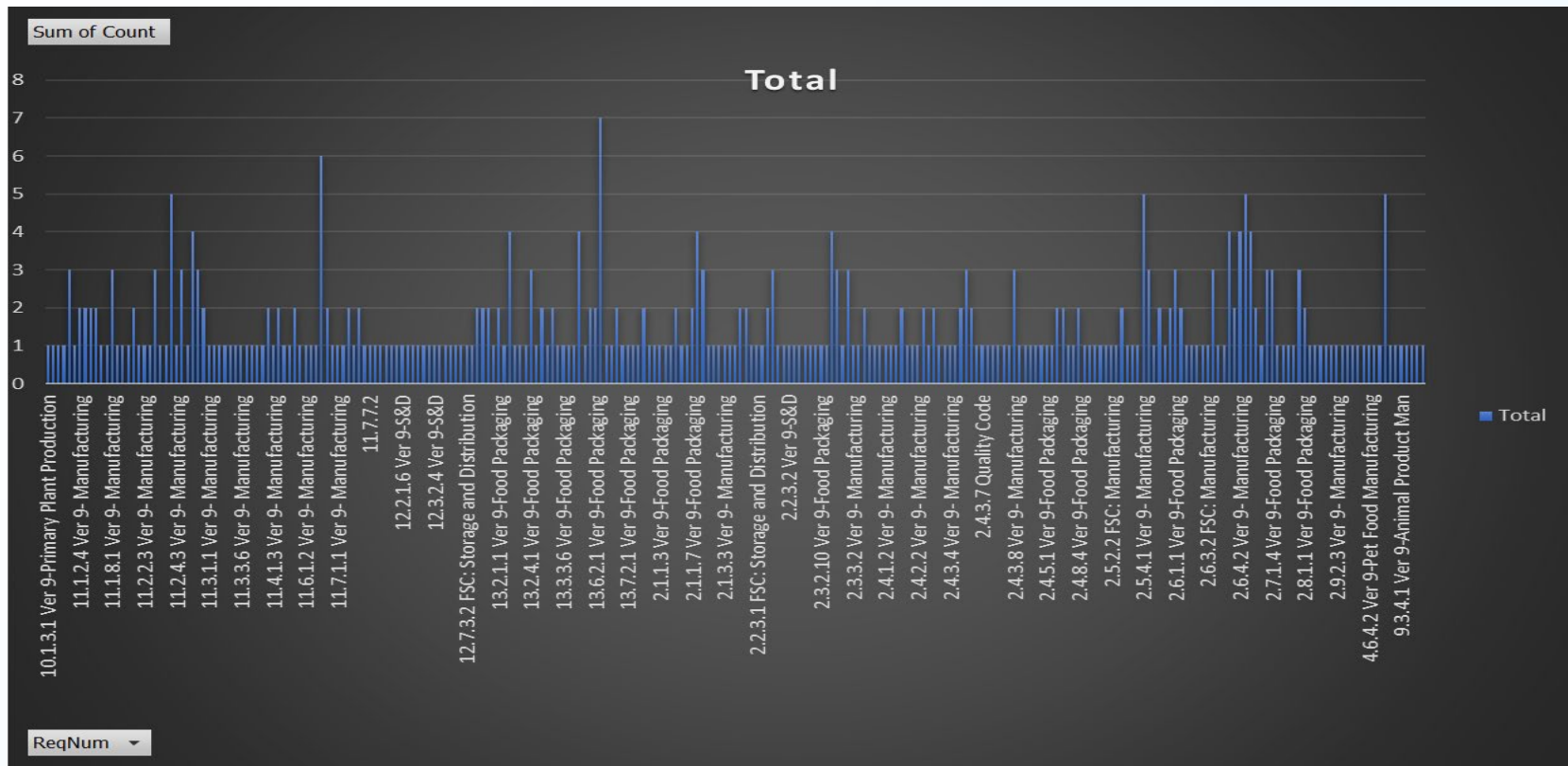


Baseline Considerations

- Found a Certification Body
- Already have your initial audit scheduled
- Someone at your facility has been employed and is operating as SQF Practitioner
- Have had a Preassessment (Optional)



Nonconformance Trends (1 Year)



Nonconformance (NCR) Trends at EAGLE Audits for the Last Year(~14 Months)

➤ Top Food NCRs in EAGLE Audits

- 11.6.4.1 (6)
- 11.2.4.1 (5)
- 11.3.5.3 (4)
- 2.5.4.1 (5)
- 2.6.4.2 (4)
- 2.6.3.4 (4)

➤ Top Packaging NCRs in EAGLE Packaging Audits

- 13.6.2.2 (7)
- 13.4.1.2 (4)
- 13.2.1.6 (4)
- 2.6.4.2 (5)
- 2.7.1.2 (4)
- 2.3.2.7 (4)



Nonconformance Trends at EAGLE for the Last Year

❓ Top Food NCRs in EAGLE Audits

❓ 2.5.4.1 (5) Internal Audits and Inspections

- ❓ 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 in full and at least annually. The methods applied shall ensure:
 - i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool;
 - ii. Objective evidence is recorded to verify compliance and/or non-compliance;
 - iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and
 - iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.



Nonconformance Trends at EAGLE for the Last Year

❓ Top Food NCRs in EAGLE Audits

❓ 2.6.4.2 (4) Crisis Management Planning

- ❓ The crisis management plan shall be **reviewed, tested, and verified** at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

❓ 2.6.3.4 (4) Product Withdrawal and Recall

- ❓ SQFI and the **certification body** shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. **SQFI** shall be notified at foodsafetycrisis@sqfi.com.



Nonconformance Trends at EAGLE for the Last Year

❓ Top Food NCRs in EAGLE Audits

❓ 11.6.4.1 (6) Storage of Hazardous Chemicals and Toxic Substances

- ❓ Hazardous chemicals and toxic substances with the potential for food contamination shall be:
 - i. Clearly labeled, identifying and matching the contents of their containers;
 - ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and
 - iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

❓ 11.3.5.3 (4) Staff Amenities

- ❓ High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled.



Nonconformance Trends at EAGLE for the Last Year

❓ Top Food NCRs in EAGLE Audits

❓ 11.2.4.1 (5) Pest Prevention

- ❓ A documented pest prevention program shall be effectively implemented. It shall:
 - i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program;
 - ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications;
 - iii. Outline the methods used to prevent pest problems;
 - iv. Outline the pest elimination methods and the appropriate documentation for each inspection;
 - v. Outline the frequency with which pest status is to be checked;
 - vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map;
 - vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available;
 - viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station;
 - ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and
 - x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.



Food Packaging



Nonconformance Trends at EAGLE for the Last Year

❓ Top Packaging NCRs in EAGLE Packaging Audits

❓ 2.6.4.2 (5) Crisis Management

- ❓ The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

❓ 2.3.2.7 (4) Specifications (Raw Materials, Packaging, Finished Product and Services)

- ❓ Description of services for contract service providers that have an impact on Food Safety shall be documented, current, and include relevant training requirements, where applicable, for all contract personnel.



Nonconformance Trends at EAGLE for the Last Year

☐ Top Packaging NCRs in EAGLE Packaging Audits

☐ 2.7.1.2 (4) Food Defense

- ☐ A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum:
 - i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident;
 - ii. The name of the senior **site management person responsible for food defense**;
 - iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points;
 - iv. The methods implemented to protect sensitive processing points from intentional adulteration;
 - v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents;
 - vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and
 - vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors.



Nonconformance Trends at EAGLE for the Last Year

❓ Top Packaging NCRs in EAGLE Packaging Audits

❓ 13.6.2.2 (7) Storage of Hazardous Chemicals and Toxic Substances

- ❓ "Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated; iv. Stored where intended and not comingled (e.g., food versus non-food grade); v. Designed such that there is no cross-contamination between chemicals; and vi. Stored in a manner that prevents hazards to raw and packaging materials, work-in-progress, food sector packaging, and product contact surfaces."

❓ 13.4.1.2 (4) Staff Engaged in Food Handling and Processing Operations

- ❓ "Personnel working in or visiting food sector packaging manufacturing, handling, or storage operations shall ensure that: i. Eating, drinking, smoking, or spitting is not permitted in areas where food sector packaging is manufactured, handled, stored, or exposed. ii. Drinking water is permitted in food sector packaging manufacturing, handling, and storage areas in a method that will not cause a food safety risk to raw and packaging materials, work-in-progress, food sector packaging, and equipment."



Nonconformance Trends at EAGLE for the Last Year

❑ Top Packaging NCRs in EAGLE Packaging Audits

❑ 13.2.1.6 (4) Repairs and Maintenance

- ❑ Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and in the cleaning program. There shall be a plan in place to address completion of temporary repairs to ensure they do not become permanent solutions.



If the Elevator to Food Safety is Broken, Take the Stairs

Pursuing Food Safety
Certification is about
consistency



Common Mistakes and Solutions

- ❓ Brief the workforce that the Audit is coming
 - ❓ Let them know the auditor will be walking around
 - ❓ Asking questions and interacting with associates
 - ❓ Talk to them about the meaning SQF and its purpose
 - ❓ Ultimately we want to ensure we are making a safe product
 - ❓ Increase Consumer Confidence
 - ❓ Increase Brand Loyalty
 - ❓ Increase Sales



Common Mistakes and Solutions

? Don't Make Assumptions

- ? Make sure you read the entire SQF Code
 - ? Guidance Documents are helpful as well
- ? I often hear “I just assumed because it’s the first audit that I didn’t need to do that.”
- ? What the Code says is What the Code Means
 - ? Ties back to Missing Exercises, Challenges, Risk Assessments
 - ? If the code says something should be done monthly, it should be done monthly
 - ? The only time you should be deviating from code is if you have an exemption or risk assessed out of a requirement



Common Mistakes and Solutions

- ❓ Not asking enough clarifying questions before responding
 - ❓ If you don't understand or can't find the reference in the code:
 - ❓ Ask the auditor to show you which clause you are deficient in?
 - ❓ Where is it in code?



Common Mistakes and Solutions

- ❑ Not conducting a full Internal Audit / Gap Assessment against the SQF Code requirements
 - ❑ Without an effective internal audit, how can you truly be prepared for the audit?



Common Mistakes and Solutions

? What's the Purpose of the Internal Audit?



¹ [Internal Audit](https://wallstreetmojo.com) (wallstreetmojo.com)



Common Mistakes and Solutions

- ❑ No Internal Audit Training
 - ❑ The code requires IA Training
 - ❑ If you have a team doing audits they should be effectively trained as well.
- ❑ What are some of the Best Ways to conduct an Internal Audit?
 - ❑ SQFI Website
 - ❑ <https://www.sqfi.com/resource-center/sqf-guidance-tip-sheets-and-checklists/>



Common Mistakes and Solutions

- ❓ Relying too heavily on the Food Safety Consultant during the Audit
 - ❓ Remember, you own your program. The food safety consultant is not there to perform the audit for you; they are there just to guide you!
 - ❓ Leverage the Consultant to do a mock audit to help you prepare to aid in your comfort and confidence.



Common Mistakes and Solutions

- ❑ Don't take on everything yourself; learn to share!
 - ❑ This is a site audit, not a Quality or Food Safety Department audit
 - ❑ Leverage your peers and department heads
 - ❑ Consider letting them cover their respective areas
 - ❑ An engaged workforce, speaks to the Food Safety Culture of the site



Common Mistakes and Solutions

- ❓ Understand Verification vs Validation
 - ❓ Verification answers the question “Are You Doing It?”
 - ❓ Trailer Inspections, conducting monitoring CCPs, magnets, screens, conducting a GMP audit
 - ❓ Validation answers the question “Is it effective?”
 - ❓ Complaint History, GMP Results over Time, Internal System Audit Results, Allergen Validation Results, EMP Trend Results



Common Mistakes and Solutions

- ❓ Focus on and Define What Food Safety Culture Means to your site
 - ❓ Understand what you are doing to create and promote Food Safety Culture
 - ❓ How do you Empower the workforce?
 - ❓ Understand how you are measuring it at the site
 - ❓ How do you plan to evaluate Food Safety Culture? What are some strategies you think will work?



Food Safety Magazine July 2021¹

¹ <https://www.food-safety.com/articles/7239-ssafe-launches-free-food-safety-culture-tool>



Common Mistakes and Solutions

- ❓ Conduct a Floor Walk / Tour Planning
 - ❓ Create a Tour Route
 - ❓ Promotes comfort for you and staff
 - ❓ Understand who needs to be on the walk
 - ❓ Understand who will be doing the process overview
 - ❓ Walk the floor to eliminate any avoidable issues / concerns



Common Mistakes and Solutions

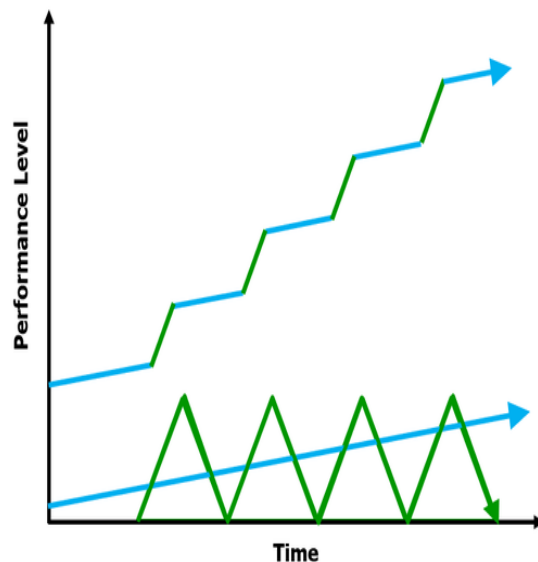
- ❑ During the audit you will be nervous so spend some time setting up and organizing the War Room
 - ❑ Dedicating and Reserving the Room
 - ❑ Have enough chairs and space for all the activities that will be conducting
 - ❑ Schedule the Opening Meeting
 - ❑ Understand How to Use the Technology
 - ❑ Do you have enough power and drop cords and cables?
 - ❑ Is there Wi-Fi available? Do you have the password?
 - ❑ Are you Projecting or Using Teams or Zoom
 - ❑ Test it out before the audit day
 - ❑ If you have paper, plan ahead, print the procedures and examples that you know the auditor will ask for
 - ❑ Make sure documents are readily accessible
 - ❑ Chase down lunch menus and have a plan prior to audit day



Common Mistakes and Solutions

- ❓ Have a Continuous Improvement Mindset
 - ❓ Develop a food safety system that works for you, not a food safety system that you have to work for
 - ❓ Don't stop at compliance to the SQF code, continual improvement of your food safety system is very important

Management Systems for Performance and for Improvement



**Performance and Improvement
Management System together
equals Continuous Improvement**



**Performance Management System
with no Improvement**

**Improvement Management System
with no Performance**

¹ <https://www.leanuk.org/what-is-a-lean-management-system/>



Questions...





Thank you!

Vernon Edwards | Lead Auditor

vernon.edwards@eaglecertificationgroup.com

