

# TOP 10 SQF NONCONFORMANCES (V8)



MINOR		MAJOR*	
1	2.7.1.3 Food defense plan	1	2.7.2.1 Food fraud program
2	11.2.9.2 Equipment, utensils and clothing	2	2.4.8.1 Environmental monitoring
3	11.4.1.1 Staff engage in food handling	3	11.2.13.1 Cleaning and sanitation
4	2.7.2.1 Food fraud program	4	2.4.3.2 Food safety plan
5	11.2.13.1 Cleaning and sanitation	5	2.5.1.1 Validation and effectiveness
6	11.2.3.1 Walls, floors and ceilings	6	2.5.5.1 Internal audits and inspections
7	2.4.3.7 Food safety plan	7	2.4.3.13 Food safety plan monitoring
8	2.2.3.2 Records	8	11.2.12.2 Identified pest activity risk
9	11.2.2.1 Floors, drains and waste traps	9	11.2.10.1 Maintenance program
10	2.1.3.2 Management review	10	11.7.6.2 Metal detector management

**\*MAJOR NONCONFORMANCES ACCOUNT FOR 3% OF ALL NONCONFORMANCES**

## TAKE AWAYS

The new requirements of V8 are being learned, including **food fraud**, **food defense** and **enhanced environmental monitoring**.

### Problems seen year after year:

- > Poor repair of equipment and utensils
- > Floors, walls and ceilings still a risk

### Struggles with well-established programs:

- > Food safety plan
- > Internal audits
- > Management of records

### Announced vs unannounced audits:

- > Nearly no difference for minor nonconformances
- > More major nonconformances for programs during announced audits
- > More major nonconformances for observations during unannounced audits

# TOP 10 SQF NONCONFORMANCES (V8): HOW TO IMPROVE

## Learn the new requirements of V8

### Food fraud

- > Document vulnerability assessment and mitigations plans
- > Annual review of program
- > Keep detailed records

### Food defense

- > Identify senior management responsible for program

### Review annually

- > Methods for authorized personnel to key access points
- > Methods to protect sensitive processing points
- > Measures to secure raw materials and packaging
- > Measures to secure during storage and transportation
- > Methods to control access to facility

### Environmental monitoring

- > Risk based program for food and pet food
- > Document responsibilities and methods
- > Sampling and testing schedule
- > Keep records or corrective actions and trends

## Manage food safety plan

- > HACCP team refresher training
- > Review supporting documents at annual check
- > Outside set of eyes during annual review
- > Validate all CCPs
- > Question newer employees during internal audit at CCP monitoring stations, not just veterans

## Evaluate condition of facility, equipment & utensils

- > Preventative maintenance schedule
- > Use Plant Improvement Plan (PIP) system
- > Focus internal audit program on equipment, processes as well as employees
- > Use flashlight when conducting internal audits
- > Train and empower production employees to identify opportunities
- > Implement system for temporary repairs

## Implement strong internal audit program

- > Manage all non-conformances with a corrective action program
- > Document all findings during internal audits
- > Interview your employees during internal audit (get them accustomed to answering questions)
- > Focus on facility/processes, not just employees
- > Have a mix of announced/unannounced audits
- > Formalize the process

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