

Corrective Action- Requirements of GFSI Standards

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Objectives

- To understand concept of non-conformities
- To understand concept of Correction
- To understand concept of Root Cause Analysis
- To understand concept of Corrective Action
- GFSI Standards Requirements for Corrective Action

A. Non Conformances & GFSI Standards

- Types of Non Conformances & GFSI Standards
- Timelines & Requirements for closure of Non-conformances
- Rights to Appeal and Dispute

Types of Non-conformances- SQF Code

- Critical
- Major
- Minor

Types of Non-conformances- BRC Food

- Critical
- Major
- Minor

Types of Non-conformances- IFS Food

- Major
- Knock-out (KO)

Types of Non-conformances- FSSC 22000

- Non-conformity (Major)
- Minor Non-conformity

Timelines & Requirements for Closure of Non-conformances- SQF

- Critical- Failed Audit
- Major- 14 days
- Minor- 30 days

Timelines & Requirements for Closure of Non-conformances- BRC

- Critical- **Non-certification**
- Major- **28 days**
- Minor- **28 days**

Timelines & Requirements for Closure of Non-conformances- IFS

- Deviations (C,D)- 2 weeks
- Major or KO (B and/or D)- 2 weeks after Pre-report

Timelines & Requirements for Closure of Non-conformances- FSSC 22000

- Major (MNC)- 14 days
- Minor- 90 days

Appeals and Disputes- GFSI Schemes

- SQF- Appeals and Disputes
- BRC-Appeals
- IFS
- FSSC 22000

B. Correction, Corrective Action and Preventive Action

- **Correction**- Action taken to contain the non-conformity immediately
- **Corrective Action**- To prevent the **RE-OCCURRENCE** of a non-conformity
- **Preventive Action**- To prevent the **OCCURRENCE** of a non-conformity

Purpose of Corrective Action System

- To collect and analyze information to identify actual and potential product safety and quality problems
- To investigate product safety and quality problems and take appropriate and effective corrective or preventive action
- To verify or validate the effectiveness of corrective and preventive actions

Correction

- Short-term solution or 'quick fix'
- Containment actions
- Should be taken immediately to stop the symptom
- Containment actions or corrections should be very specific

Examples of Correction

Example 1

- **Non-conformity:** Cracks on the floor in mixing/blending area
- **Correction:** Cracks sealed in mixing/blending area

Example 2

- **Non-conformity:** Metal detector records are not current
- **Correction:** Metal detector records updated.

Examples of Correction- contd.

Example 3

- **Non-conformity:** Pesticide residues have not been identified as a potential hazard in the hazard analysis of imported spices.
- **Correction:** Now the HACCP plan has been identified as a hazard in the HACCP plan

Example 4

- **Non-conformity:** There was no evidence of review of HACCP plan in year 2014.
- **Correction:** HACCP plan is now reviewed by the QA Manager

Corrective Action (CA)

Corrective Action Process

- Should address the Root Cause
- Should, therefore, address the question,
 - “What in the system failed such that the problem occurred?”
- Not only addresses the system, but should be “irreversible”
- There should be at least one corrective action for each root cause that was identified.
- Subsequent data should show that the problem has 100% disappeared.

Corrective Action- contd.

Corrective Action Process

- Scan the entire system to ensure no other similar nonconformity could occur.
- Analyze the effect such a nonconformity may have had on a product or service produced before the nonconformity was discovered, and take action appropriate to the severity of the situation.
- Establish thorough follow-up to ensure the correction is effective and recurrence has been prevented.

Root Cause Analysis

What is it?

Steps to Root Cause Analysis

Step 1: Define non-conformity

Step 2: Collect Data

Step 3: Identify the causal factors

Step 4: Identify root cause

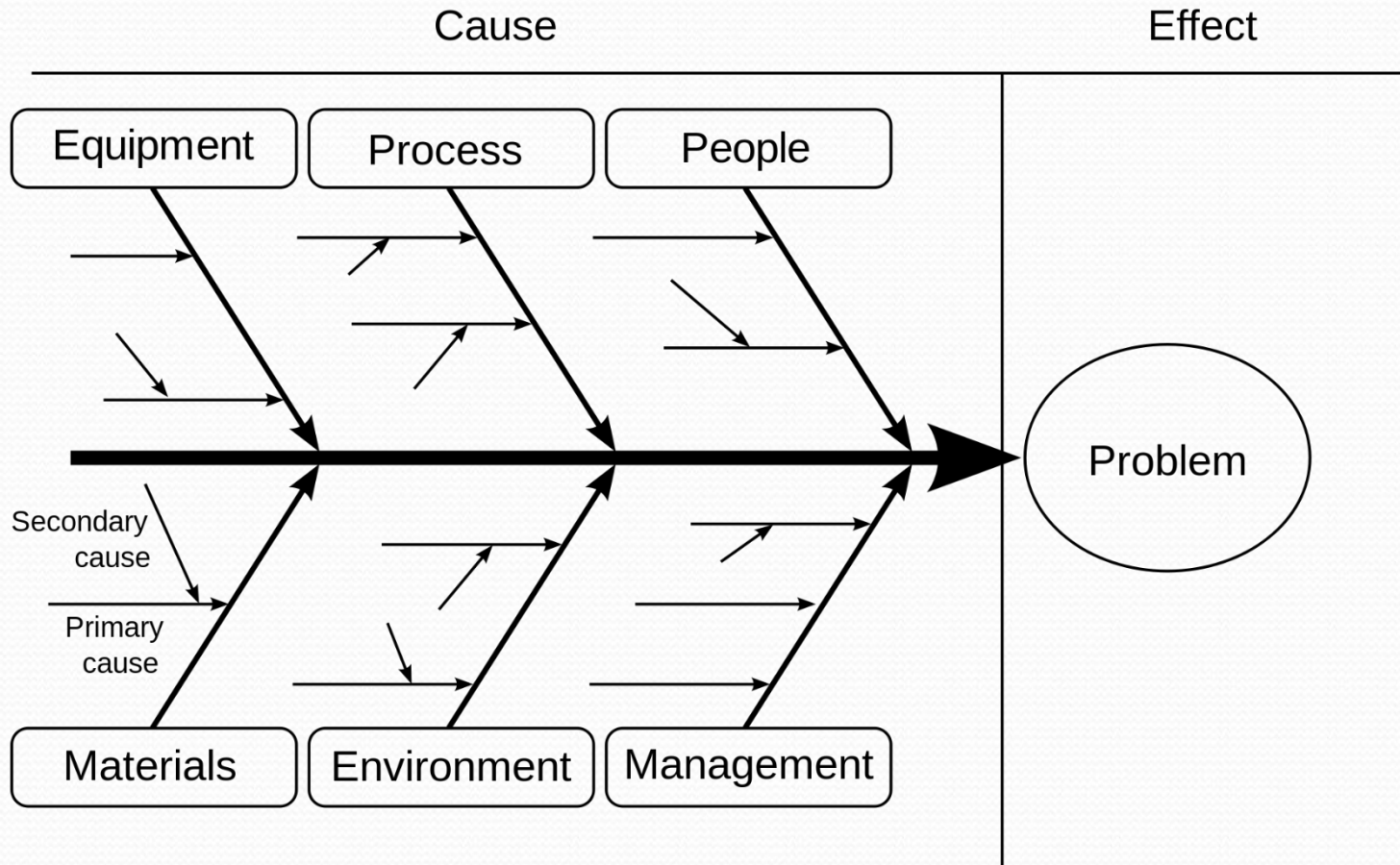
Step 5: Implement solutions

Root Cause Analysis- Tools

The 5-Whys'

(Ref: BRC Understanding Root Cause Analysis)

Root Cause Analysis- Tools



Examples of Corrective Action

Non-conformity: Cracks on the floor in mixing area

Correction: Cracks sealed in mixing/blending area

Root Cause Analysis

- No regular facility maintenance inspection program
- Poor quality of construction

Corrective Action

- Monthly facility maintenance inspection started; identified areas with faulty flooring
- Repaired the areas having poor quality of construction materials

Examples of Corrective Action

Non-conformity: Pesticide residues have not been identified as a potential hazard in the hazard analysis of imported spices.

Correction: Now the HACCP plan has been identified as a hazard in the HACCP plan.

Root Cause Analysis

- HACCP team did not have adequate training

Corrective Action

- HACCP team underwent International HACCP Alliance accredited training
- Reviewed HA again and identified a few more hazards that were missed out.



Questions?