### TOP 10 SQF NONCONFORMANCES (V8)

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

*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