intertek
SAI GLOBAL

WHITE PAPER

BUILDING AN EFFECTIVE
FOOD SAFETY
MANAGEMENT SYSTEM

saiassurance.com.au/food

INTRODUCTION

The years during and since the pandemic have been some of the most challenging times in history for everyone and the food industry was no exception. Every segment of the supply chain was impacted both locally and globally and in many cases the challenges are ongoing.

Many in the Australian food industry had more than acceptable food safety programs in place before the pandemic, yet still faced unprecedented challenges as it unfolded. Supply chains and business continuity were most significantly impacted, and a new level of risk management evolved, above and beyond any seen previously. Across the industry cleaning, hygiene, and sanitation practices have been transformed and a much sharper focus has developed around sustainability.

Food manufacturers, storage facilities, distributors, and retailers are managing business continuity challenges daily and the urgency to develop stronger food safety systems has never been greater.

IN THIS WHITEPAPER WE WILL COVER:

Establishing and Implementing an Effective Food Safety Management System
The food industry is growing at a rapid pace, and the need for strong food safety systems has never been greater. Professionals in this space must now balance emergency preparedness with year-round preventive measures to protect their company operations. This section will uncover:

- What food safety management systems (FSMS) are and why they matter.
- The key challenges that need to be addressed in a food safety management system.
- Implementing an effective food safety management system.

Maintaining an Effective Food Safety Management System
When was the last time you reviewed your food safety management system? Is it still relevant and effective in meeting today's challenges? This section will look at ways you can maintain an effective FSMS to overcome challenges and continually strive for excellence.

- How effective is your food safety management system?
- Overcoming challenges and constantly striving for better.
- Steps to building an effective food safety management system.
- Defining a food safety culture through GFSI requirements.

Tips to Improve Your Food Safety Management System
Most organisations consider their food safety management system to be a complete program when in reality, it's only the beginning. In order for it to be successful, organisations must strive for continual improvement. This section of the whitepaper will explore how to:

- Achieve a successfully established food safety management system.
- Tips to improve your food safety management system and audit scores.

Preparing for Your Food Safety Audit
If your scheduled food safety audit is making you nervous, fear not! This section will highlight the 3 common reasons for a food safety audit and provide some tips on conducting a proactive approach before an audit.

- How you and your team can best approach a food safety audit.
- Tips to prepare for your next food safety audit.
- Checklist to a successful audit day.

ESTABLISHING AND IMPLEMENTING AN EFFECTIVE FOOD SAFETY MANAGEMENT SYSTEM

At Intertek SAI Global, we have dedicated experts who are committed in the continuous improvement of food safety. Transform your operations, maximise efficiencies and minimise risks to achieve sustainable growth.

What Food Safety Management Systems Are and Why They Matter.

According to research done by the CSIRO, " ...the Australian food and agribusiness industry could be worth $250 billion by 2030 if growth can continue at historical rates (~2.4% per annum)".

This kind of growth is impossible without a commitment to implementing the right food safety management systems and programs. Food Safety Management Systems underpin not only the capacity of all operators within the food and beverage industry today to get their product or service to market, but also their potential to scale their business safely and effectively for the future.

A Food Safety Management System (FSMS) is a program that specifically articulates how a business operating within the human food chain manages and improves its food safety practices. It demonstrates the integrity of that business' supply chain, including their sourcing of quality raw materials and ingredients, product labelling and packaging, and safety declarations around allergens and contamination by potentially harmful components. Along with the assurance of food safety and the prevention of adverse health events for consumers, a FSMS will detail the policies and procedures that are in place in the event of a product recall or food fraud.

The Key Challenges That Need to be Addressed in a Food Safety Management System.

There are fundamental aspects of a food safety program that must be in place, however there are also specific areas that are often challenging across the board.
The most common challenges for businesses to address when implementing their food safety program are:

- Cleaning, hygiene, and sanitation
- Managing supply chains
- Sustainability
- Food safety culture
- Business continuity

Cleaning, Hygiene, and Sanitation

The foundations of food safety of course lie in effective and thorough cleaning and sanitation of all aspects of the facility and its operations. A business should understand the risk factors specific to their operations – such as whether they're a wet or dry facility, if they're exposed to environmental contaminants, or whether they have adequate or appropriate equipment and resources for their requirements. Knowing this background detail ensures a full understanding of the business' current sanitation practices and will inform what elements of their food safety program need attention. Effective cleaning, hygiene and sanitation are crucial in a food safe facility, not only to remove existing bacteria, but also

to maintain an environment that prevents further (or new) growth and spread of bacteria. This can be done by consistent management of conditions so as not to encourage microbial growth.

Getting the basics in place is probably the most important. This includes knowing the difference between 'cleaning' and 'sanitising' and ensuring the appropriate cleaning and sanitisation procedures are in place, as well as any special requirements to factor in around COVID-19 protocols. It's also advised to develop a pre-operational inspection checklist that documents the condition of equipment and processing areas before production commences, and after cleaning and sanitation is completed. These inspections can be regularly conducted by the relevant qualified team members on site such as the production supervisor or the QC leads. Incorporating tools such as allergen rapid testing kits into the program is also useful.

Managing Supply Chains

Some of the biggest news stories of the pandemic were around supply chain issues - from lockdowns and empty supermarket shelves to dwindling menus and understaffing. Every link in the chain was impacted and as greater risks than ever before presented themselves, the cracks appeared quickly, and the usual resolutions fell short.

ESTABLISHING AND IMPLEMENTING AN
EFFECTIVE FOOD SAFETY MANAGEMENT SYSTEM

Effective supply chain management depends on a solid understanding of the present-day risks and challenges as well as those on the horizon and ever evolving, including, but not limited to, food fraud, food safety, worker welfare, responsible sourcing, and environmental, social and corporate governance. This then ensures the business is adequately prepared to improve supply chain risk management practices before and as they arise. Effective supply chain management can evolve when strategic risk-based thinking is prioritised and dedicated and empowered risk management staff are in place. This creates a foundation for a strong food safety culture to be developed, where quality assurance and technical staff are supported by the broader team and a collective mindset of operational responsibility evolves, to ensure there is visibility, accountability, engagement and control.

Sustainability

There has been an increasing focus on sustainability over the past decade, due to an upward shift in consumer priorities and expectations around health, environment, and the ethics of how food is made. This encompasses how the raw materials and components are grown and sourced (including the welfare of animals impacted by its production), what effect the supply of that product may have on climate, the

environment, or local ecosystems, and how a business manages its production and waste. Organisations need to ensure they can back the claims they have made, as well as be realistic in the sustainability goals they set to achieve.

This has taken on particular significance in the food industry in recent times and companies are re-evaluating their efforts around sustainability in all aspects of their operations, including more deeply embedding it across all aspects of their CSR initiatives.

Food Safety Culture

All of the points landed on previously are of equal importance, but without a robust and deeply integrated food safety culture, there will inevitably be failures. The embedding of food safe practices and principles within an organisation requires a culture led by practical strategies and measures that everyone can understand. There are several important steps to follow to establish and implement a food safety plan, but once it's in place, the development of a food safety culture within the organisation is also essential.

For food safety to be truly embedded into an organisation, a mindset that thinks beyond compliance is required. A shared food safety culture is developed through a subtle but meaningful shift away from the gold standard practices of clipboards and ticking boxes. It becomes evident when all the logistics are in place and food safety exists as everyday behaviour.

Business Continuity

With compliance and culture defined and aligned, the focus must then shift to the future and the ongoing development of a brand's resilience and reputation. It's not enough to simply establish, implement, and maintain when it comes to food safety programs. Food Safety Management Systems must be continuously monitored, measured, evaluated, and improved. The integrity of a company's food safety practice and culture is what provides the richness and integrity to any FSMS – with all components coming together in ways that are intricate yet cohesive.

The strength of a brand's FSMS, practice and culture will only take it so far, however. Proactively integrating robust action plans around risk and potential crises is of fundamental importance, especially in an unpredictable world with an insatiably hungry news cycle. This has never in our living history been more prescient than the last few years, with staff shortages and supply chain interruptions significantly impacting how a business continues to operate. A business continuity plan will prepare a business for any crisis that may come.

Implementing an Effective Food Safety Management System.

The adoption of a food safety management system enables organisations to systematically examine every aspect of their food handling processes. Critical analysis and review of a FSMS on a regular basis creates important opportunities for continuous improvement.

Implementing food safety programs can be complex but SAI Global cuts through the complexity, translating theory, recognised standards, and technical requirements into practical measures that will help people understand, evaluate, and boost an organisation's food safety practices and culture. By adopting the appropriate Standards for an organisation, people can then follow a structured and systematic approach to implement the management systems. This includes developing documentation to meet business and standards requirements, training staff and implementing systems in the business, conducting internal audits, and management review meetings.

The Global Food Safety Initiative (GFSI) has revolutionised food safety practices, with food safety as culture now the defining feature of food safety management systems globally. An embedded food safety culture is key to maintaining an effective food safety program that is continuously evolving.

The most common standards adopted by the food and beverage industry are HACCP, BRCGS, FSSC 22000, SQF and ISO 22000, along with Global G.A.P., and IFS.

MAINTAINING AN EFFECTIVE
FOOD SAFETY MANAGEMENT SYSTEM

Having an effective food safety program in place is a non-negotiable for businesses operating in the food and beverage industry today. Once implemented, businesses must also make sure that program continues to be relevant and effective as the business grows.

There is certainly considerable time, effort and investment committed to establishing and implementing an effective food safety program, however at this point, the work has only just begun. Maintaining an effective food safety program that grows and develops with the business is as fundamental to ongoing operations as anything else the business may do. Systems and processes must be constantly monitored, assessed, and evolved in the pursuit of excellence and all of it must be underpinned by a healthy and deeply embedded food safety culture.

How Effective is Your Food Safety Management System?

Every operator across the food and beverage industry knows the strength of their business lies in the integrity of their food safety management systems. For this integrity to be achieved, a program of regular internal audits is essential.

Food safety audits shouldn't just be conducted because they are a requirement of standards. They are a great opportunity to identify issues, explore ways to resolve them and continuously improve processes. There are some key questions to consider that really are the foundation of any good audit.

They are:
- Do we have a system? (Intention).
- Are we following it? Implementation).
- Is it working? (Effectiveness).

Inherent in a food safe business is a commitment to establishing, implementing, and maintaining food safety. The answers to these questions will ensure a robust process of monitoring, measurement, and evaluation is in place and continuously evolving. A regular internal audit program means an organisation can be truly empowered to not only remain operational but to grow in a sustainable way.

Overcoming Challenges and Constantly Striving for Better.

When establishing and implementing an effective food safety management system, there are some key areas where most challenges will arise. These include cleaning, hygiene, and sanitation; supply chain management; sustainability; food safety culture; and business continuity. As each of these areas is developed over time, mistakes are commonly made, however avoiding issues and non-conformities altogether is the ideal. Maintaining an effective food safety program means mistakes are treated as learning opportunities and the culture's growth and improvement is driven by strong leadership and a rich and evolving food safety culture.

With this aspiration in mind, there are some key solutions that will support and strengthen the potential of a food safety program's pursuit of greatness.

Commitment from Management
- to put food safety first every day and walk through the facility daily.
- to provide adequate support and resources to not only proactively protect consumers, but also the organisation, their employees and their supply chains.
- to maintain a directive that products unsafe for consumption don't leave the facility.
- to encourage an 'every day could be audit day' approach.

Fully Trained and Informed Senior Management and General Staff
- continuously reviewing the training programs to ensure they continue to be relevant and effective.
- in HACCP, preventive controls for human foods, GMPS, allergen controls and environmental monitoring where relevant
- in an approach that is multidisciplinary and multi leveled to build a resilient culture that can adapt strategically as needs change over time.

Root Cause Analysis and Preventative Actions
- by conducting various measurements and assessments to determine if the product, and other components within the FSMS, are operating within the defined parameters. For example, conducting environmental microbial swabs, mock recalls, or ensuring measurement equipment is properly calibrated.
- by establishing the underlying cause of a problem (Root Cause Analysis) to identify and resolve the issue.

- by recognising systemic issues that prevent innovative and progressive problem solving.
- by correcting an issue in a different way to implement a preventative action, rather than setting a precedent for repeated failures.

A Deeply Ingrained Food Safety Culture

- that is evident as soon as you enter the facility.
- that understands food safety culture depends on everyone. Active engagement is essential from the most senior management to the casual employee.
- that manifests as an intangible focus across the organisation on the shared values, beliefs and norms that affect the collective mindset and behaviour toward food safety.

Steps to Building an Effective Food Safety Management System (FSMS).

A FSMS is more than just a legal requirement. For food businesses committed to the long-term viability and success of their operations, it is a necessity.

This 8-step checklist ensures all the relevant processes, policies, and workflows are in place to identify, control and eliminate hazards in any food processing facility.

1. Food Safety Management Training

A great FSMS is developed by a skilled and knowledgeable leadership team. Your staff should be appropriately trained and informed to establish and maintain whatever your systems require, including building HACCP into your operations.

Training is an ongoing process to ensure compliance against your existing FSMS program and its development. Hence, training programs should be reviewed to ensure they remain effective and all staff (including contractors) are up to date with current processes and procedures.

2. Food Safety Policy Setting

Clear policies not only set the parameters for working; they reinforce the collective commitment to maintain a food safe facility. This includes defining responsibilities for staff and ensuring everyone understands their designated roles.

3. Understanding Scope and the Business' Potential for Food Safety Hazards

The scope of a business refers to its type, size, location, and clientele. The potential for hazard should be clearly understood based on these foundations. Risks around production, storage, food preparation and so on will differ between for example a food truck and a childcare centre.

4. HACCP Building

The most common and viable way to bring a FSMS to life is with a HACCP system. Drafting it usually involves flow charts and tables that identify and reduce risk across hazard categories, and corrective action planning for resolutions.

5. Pre Inspection Checklists

One of the most powerful tools in a food safe facility are pre-inspection checklists – every day as well as in preparation for an audit. Their implementation literally ensures all boxes are ticked at regular intervals, from staff training and hygiene to processes and procedures.

6. Setting Up Complaint and Incident Procedures

A clear system that ensures diligent recording, correction and prevention of mistakes and incidents protects staff as well as the business. It should also detail how incidents are investigated and the usual processes to follow for corrective actions.

7. Consistent and Continuous Review

For improvement to be consistent, management should continuously review policies and procedures, as well as the laws and Standards the business must be adhering to and adjust where necessary.

8. Gathering and Storing Required Evidence

Documentation will need to be provided at various stages of operation – particularly when an incident has occurred. All records must be kept up to date, safely and securely stored and able to be accessed quickly when required.

Defining a Food Safety Culture Through GFSI Requirements.

The Global Food Safety Initiative (GFSI) is a benchmark that ensures food safety equivalence is established globally.

GFSI recognition of food safety schemes from different regions mean that business' food safety practices are easily translatable from one country to another. GFSI recognition tells a foreign market that a business is operating to a set of commonly recognised food safety standards and practices.

In Australia, the food safety schemes that were among the first to be recognised by the GFSI include:

- FSSC 22000 – Food Safety System Certification
- SQF – Safe Quality Food
- HACCP – Hazard Analysis and Critical Control Points
- BRCGS - British Retail Consortium Global Standards

Food safety practices have been revolutionised as a result of the Global Food Safety Initiative. Food safety as culture is now the defining feature of Food Safety Management Systems globally, with 'culture over compliance' empowering everyone to strive for better.

Food safety culture drives a commitment from senior management to establish, implement and maintain food safety, which is in turn strengthened by an organisation-wide alignment towards continuous improvement.

The end goal is elevated beyond just having bigger and better food safety programs – it's a collective belief in the value and importance of food safety culture.

TIPS TO IMPROVE YOUR FOOD
SAFETY MANAGEMENT SYSTEM

Achieving a Successfully Established Food Safety Management System.
Once a food safety management system has been established and implemented, there is a period of time that must follow where it is operational and can be reviewed for potential issues and necessary adjustments.

During this time an organisation can determine the effectiveness of the plan, assess gaps, adjust and implement improvements where required and ensure that an effective food safety program can be maintained into the future.

These initial stages are dedicated to establishing processes, routines, logistics, and responsibilities and once in place should run harmoniously together and become embedded in day-to-day operations as culture. Once that is all in place, a food safety management system should grow and evolve organically with the business and its operations.

Tips to Improve Your Food Safety Management System and Your Audit Scores.
These tips will help your food safety leadership team to improve your food safety management system across the board and as a result, improve your audit scores.

1. Be Prepared
Aspiring to a mindset of 'every day is audit day' prioritises preparation and organisation. Being prepared means documents and records are effectively managed, practices and processes are well established and the food safety plans that are in place are representative of all units and aspects of production. Internal audits are a great way to assess the effectiveness of your food safety management system, identify gaps and resolve them before the audit with your chosen certification body.

2. Learn and Grow from Your Mistakes
The results of an audit provide great insight for a proactive facility to progress. Non-conformances and the corrective actions that result from them are opportunities for resolving issues once and for all and putting preventive measures in place where required. A successful audit should not become a breeding ground for complacency. Continuous improvement is an expectation embedded from one audit to the next.

3. Strive to Exceed Compliance Expectations
A subtle layer of 'failure is not an option' is a useful addition to the previously mentioned 'every day is audit day' mindset. Programs must be continuously tested, verified, validated, and challenged. Evidence in the form of documents, records, interviews, and observations, should be collected, collated and provided that objectively details proof of compliance above and beyond the expectations of an auditor.

4. Embrace the Data
Taking charge of the data at your disposal is an empowering choice that helps you understand risks more deeply and identify improvements more strategically. By comparing and contrasting the data available – including customer complaints, hold logs, environmental results, internal audit scores, pre-operational inspections, and evaluation outcomes – we can put together a comprehensive picture of findings, trends, causes and outcomes. When data like this is embraced and recognised for the tool of discovery it can be, compliance becomes effortless and dare we say it – exciting.

5. Build Strong Leadership and an Empowered and Enthusiastic Team
A perpetually compliant facility is fundamentally dependent on the people who are responsible for its food safety management system at every level. Teams are well trained in their specialty areas, knowledgeable, and accountable to each other for ongoing learning to effectively implement the plan. Leadership encourages and supports the team with an open-door policy and leads by example. Expectations are well managed and an understanding that food safety is everyone's responsibility is inherent.

6. Develop a Thriving Food Safety Culture
As defined by the Global Food Safety Initiative (GFSI) food safety culture is the "shared values, beliefs and norms that affect mind-set and behaviour toward food safety in, across and throughout an organisation".

This definition reflects the essential nature of culture being dependent on a group rather than the individual, on values agreed upon and understood by all and a collective conscience towards the bigger picture. Food safety culture is an ever-evolving journey, and the commitment by all to achieve the shared goal is a crucial component of a successful food safety program.

PREPARING FOR YOUR
FOOD SAFETY AUDIT

How to Best Approach a Food Safety Audit.

When a strong food safety culture is embedded in an organisation, half the work of audit preparation is already done. A successful audit depends on the whole team being across the food safety program - from establishment and implementation to procedures and record keeping.

A team that is well organised will be properly equipped to provide necessary documentation and records on request. In addition, a team that is appropriately trained can provide clear and concise answers to questions, in a polite and informative way.

By making sure everyone understands the value of food safety audits, a shared motivation will evolve, that drives a state of readiness across the whole team. A positive and open mindset towards audits will naturally evolve within a healthy food safety culture and should be encouraged.

Tips to Prepare for Your Next Food Safety Audit.

When preparing for your next audit, it's crucial to reflect on what's already been done and eliminate any possibility of wheel reinvention.

The hard work that has gone into maintaining the program and improving it should not go to waste. Your last audit should be your starting point for your next one – providing you with all the building blocks you need.

- Food safety plan reassessment is of course done annually, but once more in time for the audit (which is mandatory anyway), will get everyone up to speed on changes in processes, equipment, and products.
- Similarly, a refresh of Environmental Monitoring (EMP) and Good Manufacturing Process (GMP) programs will ensure sanitation programs and relevant checklists are up to date.
- Past non-conformances are a great tool to educate and motivate. Failures can create a mindset of complacency, but an honest and open attitude towards non-conformance can foster a spirit of continuous improvement. Encouragement to revisit what went wrong, how it was resolved and how it's working now is key here.

Practice makes perfect as they say and reviewing existing plans and programs, running through them, and adjusting where required will ensure everyone is in a state of readiness once the audit date has arrived.

- Internal audits are preparation for success. They ensure continuous improvement as well as verification that everything is working. They are the greatest tool available and a comprehensive overview of the entire food safety management system. They also offer an important advantage - being able to identify and resolve issues in advance prepares the team for what's ahead in the audit and increases the chance of a successful audit outcome.

- A review of processes for recalls, and food defence and fraud programs will refresh the team on things like recall plans, vulnerability assessments, and mitigation plans and prepare them for any questions the auditor may have around procedures, responsibilities, and actions.

Checklist to a Successful Audit Day.

Once all of the reviewing, planning and adjusting has been done, there is only preparation for the event itself that's left. Checking through the list below will ensure everything the auditor will expect is readily available and everyone involved in the audit is sufficiently equipped to play their part.

Familiarise yourself with the food safety standard requirements for certification as this may have been updated since your last audit.

- Prepare site visits in advance where applicable.
- Make sure all the necessary paperwork and documents are completed before the audit.
- Ensure you are able to demonstrate the policies and procedures outlined in your plan
- Organise all the important documents so they are readily available and easy for the auditor to navigate when required
- Clear the schedule of all staff involved in the audit so they are available at whatever point of the audit that's necessary
- Be up to date on previous non-conformances and able to report on developments since the last audit
- Communicate positively with the team in the days leading up to the audit. Engage and motivate their participation and encourage them to be proud of the part they play in the food safety culture of the organisation.

At Intertek SAI Global, we understand the organisational challenges of building stakeholder trust and confidence at all stages of maturity. We work with organisations to help them meet stakeholder expectations for quality, safety, sustainability, integrity and desirability in any market and industry worldwide, while embedding a critical risk-based thinking and a continuous improvement culture.

With offices in 21 countries and services clients globally, delivering more than 125,000 audits and training more than 100,000 students through its Assurance Learning courses each year.

Our services include:

- Audit and Inspection – An accredited certifying body with respected and independent expert auditors
- Learning and Training – Extensive range of accredited courses to support career advancement, career change or enhanced industry expertise
- Testing and Analysis – Helping you implement a comprehensive food safety and quality strategies to achieve compliance with local, national and international regulations
- Product Certification – Third-party certification against known standards for product conformance
- Business Advisory – An independent team to support business improvement and control, including your supply chains

FOR MORE INFORMATION

✉ assurance@saiglobal.com

🖱 saiassurance.com.au

intertek
SAI GLOBAL