

WHITE PAPER

# THE EVOLUTION OF A FOOD SAFETY CULTURE

A strong food safety culture helps your organization achieve one of its most important goals: satisfied customers enjoying and sharing your product with family and friends, safe in the knowledge that it's from a trusted brand.

Discover why organisational culture is so important to food safety, and how the industry's approach to it has evolved. Implementing the right culture can be complex but Intertek SAI Global cuts through the complexity, translating theory, recognised standards and technical requirements into practical measures that will help you understand, evaluate and boost your organisation's food safety culture.



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## Introduction

Navigating from basic compliance to proactive food safety began with Hazard Analysis and Critical Control Points (HACCP) risk management systems. This was the first systematised approach adopted by food producers and suppliers to identify, evaluate and control hazards related to food safety. But the evolution to a food safety culture has been just as important. Once the right safety, compliance and improvement mindset is in place, regulating authorities and customers alike can be confident that food organisations are taking appropriate measures to assure food safety.

While industry attitudes have evolved, so too have the expectations of all parties within the food supply chain, from growers to consumers. As food supply chains become more complex, more connected and more global, the risks have increased exponentially – and so too have the rewards.

## What is 'food safety culture'?

An organisation's culture is made up of people and processes. It's created through the intersection of an organisation's values, behaviors, business systems, workflows and partnerships, and enacted through day-to-day communications, interactions and operations.

Every organisation, large or small, has a culture, whether it's explicitly recognised or not, and this culture can have a remarkable impact on attitudes towards safety.<sup>1</sup> A positive culture is an ongoing system of checks and balances that is reinforced at all levels and stages of the organisational and employee life cycle. Critical to a positive food safety culture is that food safety is viewed as an important business objective. It should have documented plans in place with all employees understanding their role in food safety and the value they provide.

## The evolution of food safety culture

In the late 1960s a team of food scientists and engineers from the Pillsbury Corporation, in conjunction with NASA, developed the program we know today as HACCP. Its purpose was to ensure the food safety for the first manned space missions.<sup>2</sup> Today HACCP consists of seven principles based on CODEX 2020 edition<sup>3</sup>:

1. Conduct a hazard analysis and identify control measures
2. Determine the Critical Control Points (CCPs)
3. Establish validated critical limit(s)
4. Establish a system to monitor control of CCPs
5. Establish the corrective action to be taken when monitoring indicates a deviation from a critical limit at a CCP has occurred
6. Validate the HACCP plan and then establish procedures for verification to confirm that the HACCP system is working as intended
7. Establish documentation concerning all procedures and records appropriate to these principles and their application

During the 1990s, a series of high-profile international food safety crisis unfolded, including incidents with BSE, dioxin and Listeria mono. This caused the food industry to experience 'audit fatigue', as retailers and brand manufacturers audited factories against their countless in-house standards, each of which were developed in isolation and with no consideration of convergence. The results showed no consistency and confidence was low, from consumers and industry alike.

**The food industry's attitude towards food safety has evolved. Where once the sole focus was on meeting compulsory legal requirements, organisations now understand that a proactive food safety culture is a source of business value. This value comes in two forms: 'negative' (i.e. cost savings by avoiding problems and incidents) and 'positive' (i.e. employee engagement, enhanced reputation and product safety). As a result, savvy organisations have become dedicated to continuous improvement and creating a strong food safety culture.**

The CEOs of the world's food retailers, working through their independent groups including the Consumer Goods Forum, the Global Commerce Initiative (GCI) and the Global CEO Forum, agreed to take collaborative action. In May 2000, the Global Food Safety Initiative (GFSI), a non-profit foundation, was founded<sup>4</sup>, and in 2009 the independent groups merged to form the Consumer Goods Forum (CGF), governed by a Board of Directors drawn from manufacturers and retailers.

GFSI benchmarked a set of common criteria defined by food safety experts, with the objective of making food manufacture as safe as possible. Several highly regarded food safety schemes including BRC Global Food Safety, Food Safety System Certification (FSSC 22000), International Food Standard (IFS) and Safe Quality Food (SQF) were amongst the first to gain GFSI recognition.

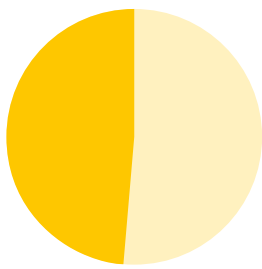
Today GFSI has provided a credible benchmark system to establish equivalence across the recognised schemes.

This was to become an ongoing theme for the GFSI and the food industry. Speaking at the GFSI conference Jürgen Matern, VP Regulatory Affairs & External Relations QSHE at Metro AG, commented that:

Research tells us that consumers don't trust governments, brand manufacturers or retailers. We need to improve this by building global awareness and by promoting a better food safety culture. Specifically, we must build confidence in certification based on solid facts<sup>5</sup>.

Traditional food safety prescriptions of more training, more inspections and more testing are not enough. Making a bigger, better or stronger food safety program is not enough, we need a better food safety culture. Having a strong food safety culture is a choice<sup>6</sup>.

**Frank Yiannas**  
 FDA Deputy Commissioner for Food Policy and Response



**47%**

OF CONSUMERS WERE LESS TRUSTING OF A COMPANY WHERE MAJOR FAULTS HAD OCCURRED



### Creating a food safety culture

Food safety culture needs to start at the top of the 'people pyramid'. A strong commitment at all levels of management is imperative to craft effective policies and ensure a consistent, comprehensive and responsive approach to risk management. An organisation's leadership teams must also provide guidance and lead by example to ensure that systems and procedures are implemented.

Clarity and leadership from all levels of management creates an engaged and safety-aware workforce focused on prioritising consumers' health. This is evidenced and supported by putting in place programs, processes and policies covering all aspects of supply and production, from manufacturing and storage to shipping and sales.

The GFSI technical working group (TWG) created a blueprint to be embedded into standards for the maintenance of a positive food safety culture in any business, regardless of its size or focus.

GFSI defines a food safety culture as "the shared values, beliefs and norms that affect mindset and behaviour toward food safety in, across and throughout an organisation"<sup>7</sup>

A robust food safety culture ensures that consumers enjoy reliable, safe and high-quality sources of food. Organisations benefit in several ways, including fewer safety and regulatory incidents, consumer complaints and recalls – all of which are time-consuming and costly.

Food outbreaks and supply chain failures can happen regardless of lengthy preparations. However, a strong prevention plan can reduce this risk of occurrence and mitigate their severity if they occur.

Focusing on safety can also protect a brand's reputation and profits. Globalisation and social media allow strong reputations built over many years to be damaged – sometimes irreparably – within hours or even minutes. The 2017 Consumer Trust Index survey revealed that "47% of consumers were less trusting of a company where major faults had occurred". Creating a strong food safety culture will reduce the potential for these issues to occur in the first place and strengthen brand trust.<sup>8</sup>

Food safety culture is "the shared values, beliefs and norms that affect mindset and behavior toward food safety in, across and throughout an organisation". – GFSI

## Why food safety culture matters

Knowledge and experience alone do not produce behavioural change. Companies spend millions on their processes, achieving certification and training, yet many still endure major incidents and numerous enforcement visits. What would a world without food safety culture look like?

In 2008, a US ingredient company was implicated in one of the most extensive food recalls with more than 360 companies affected and over 3,900 products across 46 states due to Salmonella contamination and outbreak. The company had multiple second and third-party audits, as well as a testing program but the lack in leadership in making the right food safety decisions to address issues found and a history of not having a strong food safety culture resulted in major FDA regulation changes – Food Safety Modernisation Act.

Further, the number one type of recall in the US is undeclared allergens. Even with companies sound policies and procedures in place at the required levels expected for addressing these issues, they sometimes fail due to poor food safety culture. The desire to follow processes, effective communication, and a keen eye for errors must be upheld by each and every team member.

Additionally, to prevent such outcomes, programs, policies and processes need to be monitored for continuous improvement and embedded within the organisation.

According to the Centers for Disease Control and Prevention (CDC) Annual Report of Incidents 2017<sup>10</sup>, there were 841 foodborne disease outbreaks resulting in 14,481 illnesses, 827 hospitalisations, 20 deaths, and 14 recalls. The four largest microbiological contributors of illnesses were:

- Norovirus (46% illnesses, 4 deaths)
- Salmonella (29% illnesses, 8 deaths)
- Clostridium perfringens (5%, 0 deaths)
- Shiga toxin-producing E. coli STEC (6% illnesses, 1 death)
- Listeria monocytogenes (<1%, 3 deaths)

These types of incidents are a direct result of poor adherence to policies and procedures, and a lack of control, monitoring and management of the food safety system and culture. The key is they can be prevented and we can improve!

The best procedures in the world are of no benefit if team members don't follow them. Similarly, the best training and internal communications are of no benefit if their effectiveness isn't monitored and employees are not motivated to ensure food safety.

Compliance measures must be linked to business outcomes. Some of these are process-oriented and can be easily remedied, for example by adopting a mobile app-based incident reporting system or other forms of technology. But culture is still the key. Metrics are only as good as the data they're based on, so if an app is deployed but a poor safety culture is in place, this just means nobody bothers using it and it's impossible to know if metrics are accurate.

Other forms of data can also come into play. The FDA, for example, hosts a search tool<sup>11</sup> that allows companies and consumers to search a manufacturing facilities compliance. This summary includes results of inspections, number of recalls, warning letters and other regulatory issues. Now more than ever we have the power of technology at our fingertips to verify safety and to evaluate others compliance.

These are the consequences faced by businesses without a food safety culture, or with a weak one. The best defense against becoming a business 'fatality' is to ensure the resources are in place and committed to food safety – the time and money invested in systems and training – generate a return by being widely and willingly adopted by a food safety-conscious workforce, from senior management to front line workers.

## Putting safety in place

Critically evaluating your senior management, leads, supervisors, contractors, and looking to establish or improve their organisation's food safety culture should start at the top. It's crucial that senior leaders (including board members, the C-suite, and other key stakeholders) clearly understand why food safety should be a top priority. Relevant industry – and product-specific examples and other evidence can be used to highlight the business benefits and how they might be achieved.

Similarly, it's important for leaders to understand how placing targets only on financial and customer-facing performance (e.g. profit, market share or speed of service) creates a false measure of food safety and may even lead to 'negative incentives', like sacrificing safety for profit. To fully understand the organisation's performance, it's necessary to prioritise – and accurately measure – food hygiene, regulatory compliance and company culture.

At the organisational level, every program, policy, and process must be carefully examined. A sound food safety culture is built on proactivity. Programs, policies, and processes should be kept up-to-date by having team members attend training, become certified in preventive controls for foods and attend refresher courses to keep their knowledge current.

There are other supporting risk assessments and mitigation plans such as food defense and food fraud, to avoid any deliberate attempts to contaminate products and comply with regulations.

## Building a better food safety culture

Finally, companies must strive for continuous improvement through connecting key performance indicators (KPIs) to food safety culture and embed positive incentives within the organisation. It is unlikely to see the benefits of safety culture if they simply go through the motions and tick off their checklists. A strong food safety culture requires engagement with the process and a desire across the organisation to continuously improve.

David Brackston, Technical Director at BRC Global Standards, states:

An audit will make food safety culture a core focus within food businesses but will require the industry to have auditors assess and improve Food Safety Culture. Signs that an organisation may be just going through the motions include:

- Following rules without fully understanding the rationale behind food safety processes and procedures
- Consistently passing an audit with a minimum required score
- Developing workarounds to avoid audits or time spent on safety measures
- Objecting to unannounced audits
- Avoiding self-audits and accepting the status quo
- Failing to determine root causes when problems are discovered and otherwise learn from mistakes, incidents and infractions
- Failing to invest in people

If you see evidence of such behaviours, then it's imperative you act to restore your food safety culture before the organisation, its workers or its customers suffer an incident.



## Continuous compliance

Businesses can also consider their certification status against a range of internationally recognised standards. Some of these include:

- ISO 9001 – Quality Management
- BRC Global Standard for Food Safety
- IFS Food – International Food Standard
- FSSC 22000 – Food Safety System Certification
- ISO 22000 – Food Safety Management System
- SQF – Safe Quality Food
- ISO 45001 – Occupational Health and Safety

These standards structure themselves to feed into the overall food safety culture and environment by concentrating on different aspects of the organisation, but with a similar approach of focusing on culture and the way the organisation should operate. Organisations should never fear independent certification or unexpected audits. If their culture is right, then working with these standards will ensure continuous compliance.

A food safety culture should reach all departments. Organisations should review compliances associated with general safety and how they impact the way their culture operates. Maintaining high standards within the following areas safeguards the working environment:

- Environmental management
- Health and safety
- Well-being
- Investment in people through continual improvement training

The Global Food Safety Initiative (GFSI), an industry-driven global collaboration dedicated to advancing food safety, believes that to be successful and sustainable, food safety must go beyond formal regulations to live within the culture of a company.

In contrast to the rule of law, culture draws its power from the unspoken and intuitive, from simple observation, and from beliefs as fundamental as "This is the right thing to do" and "We would never do this". Rules state facts; culture lives through the human experience.<sup>12</sup>

It is critical for organisations to manage each of these areas to protect their employees from risk and create a safe working space. This protects employees, physical assets and food resources alike. In 2015, Stacey Wagner's "Ways to Boost Workplace Morale through Safety" clearly linked workplace safety to workforce morale and company value<sup>13</sup>. Simply put, a safe place to work is a good place to work, and good employee morale creates a positive culture that's reflected in company performance.

**Achieving food safety success in this changing environment requires going beyond traditional training, testing and inspection approaches to managing risks. It requires a better understanding of organisational culture and the human dimensions of food safety. To improve the food safety performance of a retail or food service establishment, an organisation with thousands of employees, or a local community, you must change the way people do things. You must change their behaviour<sup>14</sup>.**

### Change your culture, change your company

As food organisations identify the behaviors they want to see from their staff, they are creating their own unique food safety cultures. These will help them more regularly produce and deliver higher-quality products and services. Importantly, such an organisational mentality creates a positive attitude of being 'together', with shared values, vision and goals.

For this to happen, all employees, from the top down, need to have open and honest communication. This will encourage truth-telling, creating a culture where people are listened to and their concerns, opinions and suggestions are heard. The organisation must share its strategy with employees, so they know what they are working towards and the next steps in their journey for continuous improvement.

Organisations should jettison the 'blame' mentality and embrace a process-review approach to problem solving and solution identification. This means regarding every problem as a solution in disguise and an opportunity for improvement. If workers are given authority, responsibility and resources, they will be empowered to create new solutions and will understand they're valued.

By focusing on clear visibility and leadership, senior management can demonstrate that it's the things they say and do that make the difference. Communication and information sharing are critical for creating a strong food safety culture. In short, managers and leaders must not only impart knowledge, but also employees must be empowered to participate and raise food safety concerns.



### ENDNOTES

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## About Intertek SAI Global

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.

Intertek SAI Global has 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 with respected and independent expert auditors
- **Learning and Training** – Extensive range of accredited courses to support career advancement, career change or enhanced industry expertise
- **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

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