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### 4.1 Introduction to the Food Safety Management System

The company has planned, established, documented and implemented a food safety and quality management system for the site, which is maintained in order to continually improve its effectiveness in accordance with legislation, international standards and best industry practice. The company has planned and developed the processes that contribute to meeting the requirements of these standards and producing safe products.

### <u>Scope</u>

The scope of the Food Safety Management System includes all product categories, processes and activities conducted on site and any outsourced activities. These requirements are aligned with the policies and objectives of the site and include those of the following standards:

Quality - ISO 9001:2008

Food Safety - ISO 22000:2005

### **Due diligence**

The Food Safety Quality Manual demonstrates due diligence of the company in the effective development and implementation of the food safety management system. These documents are fully supported by the completion of the records specified in this manual for the monitoring of planned activities, maintenance and verification of control measures and by taking effective actions when non-conformity is encountered.

### **Food Safety**

The company is committed to supplying safe products for consumption. As part of this commitment, all products and processes used in the manufacture of food products are subject to food safety hazard analysis based on the Codex Alimentarius guidelines to the application of a HACCP system. All food safety hazards, that may reasonably be expected to occur, are identified by this process and are then fully evaluated and controlled so that our products do not represent a direct or indirect risk to the consumer. New information regarding food safety hazards is continually reviewed by the Food Safety team to ensure that the Food Safety and Quality Management system is continually updated and

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**Finished Product Summary** 

**HACCP Calculator ISO 22000** 

**HACCP Definitions** 

**HACCP Flow Diagram** 

**HACCP Flowchart Verification** 

**HACCP Flowcharts** 

**HACCP Glass Control Verification Record** 

**HACCP Hazards** 

**HACCP Intended Use** 

**HACCP Plan Sample** 

**HACCP** Prerequisites

**HACCP Scope and Product Information** 

**HACCP Steering Group Review** 

**HACCP Team** 

The Prerequisite procedures of the Food Safety Quality Management System Procedures are pre-fixed PRP and are as follows:

- PRP 1 Hygiene and Housekeeping Management
- PRP 2 Management of Pest Control
- PRP 3 Control of Visitors and Contractors
- PRP 4 Management of Cleaning
- PRP 5 Despatch and Distribution
- PRP 6 Maintenance
- PRP 7 Waste Management
- PRP 8 Hygiene Policy
- PRP 9 Glass Policy
- PRP 10 Ingredients Foreign Body Control Policy
- PRP 11 Metal Detection
- PRP 12 Nut Handling Procedure
- PRP 13 Control of Knives
- PRP 14 Control of Brittle Materials
- PRP 15 Glass & Brittle Material Breakage Procedure
- PRP 16 Types of Allergen
- PRP 17 Storage
- PRP 18 Allergen Control Procedures

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PRP 19 - Food Defence System

PRP 20 - Control of First Aid Dressings

PRP 21 - HACCP Prerequisites

The controlled records of the Food Safety Management System are pre-fixed QMR and are as follows:

QIMR 001	Management Review Minutes
QMR 002	Training Record
QMR 003	Product Release Record
QMR 004	Design and Development Records
QMR 005	Supplier Assessment Record
QMR 006	Validation Record
QMR 007	Identification and Traceability Record
QMR 008	Register of Customer Property
QMR 009	Calibration Record
QMR 010	Internal Audit Record
QMR 011	Records of Non-conforming Product
QMR 012	Corrective Action Request Form
QMR 013	Preventative Action Request Form
QMR 014	Supplier Self Assessment and Approval Form
QMR 015	Equipment Commissioning Record
QMR 016	Return to Work Form
QMR 017	Hygiene Policy Staff Training Record
QMR 018	Complaint Investigation Form
QMR 019	Prerequisite Audit Checklist
QMR 020	Knife Control Record
QMR 021	Knife Breakage Report
QMR 022	Goods in Inspection Record
QMR 023	Equipment Cleaning Procedure
QMR 024	Glass and Brittle Plastic Breakage Record
QMR 025	Metal Detection Record
QMR 026	First Aid Dressing Issue Record
QMR 027	Cleaning Schedule
QMR 028	Cleaning Record
QMR 029	Engineering Hygiene Clearance Record

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QMR 030	Glass and Brittle Plastic Register
QMR 031	GMP Audit Checklist
QMR 032	Vehicle Hygiene Inspection Record
QMR 033	Outgoing Vehicle Inspection Record
QMR 034	Pre Employment Medical Questionnaire
QMR 035	Visitor Questionnaire
QMR 036	Product Recall Record
QMR 037	Shelf Life Confirmation Record
QMR 038	Accelerated Keeping Quality Log
QMR 039	Goods In QA Clearance Label
QMR 040	Maintenance Work Hygiene Clearance Form
QMR 041	Changing Room Cleaning Record
QMR 042	Colour Coding Red Process Areas
QMR 043	Daily Cleaning Record for Toilets and Changing Rooms
QMR 044	Drain Cleaning Procedure Filler Areas
QMR 045	General Cleaning Procedure
QMR 046	Product QA Clearance Label
QMR 047	CIP Programmes Log
QMR 048	Sample Filler Cleaning Record
QMR 049	Pipe Diameter Flow Rate Conversion Table
QMR 050	QC Online Check Sheet

The Prerequisite Records of the Food Safety Quality Management System Procedures are pre-fixed PRPR and are as follows:

- PRPR 1 Hygiene and Housekeeping Management
- PRPR 2 Management of Pest Control
- PRPR 3 Control of Visitors and Contractors
- PRPR 4 Management of Cleaning
- PRPR 5 Despatch and Distribution
- PRPR 6 Maintenance
- PRPR 7 Waste Management
- PRPR 8 Hygiene Policy
- PRPR 9 Glass Policy
- PRPR 10 Ingredients Foreign Body Control Policy
- PRPR 11 Metal Detection

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PRPR 12 - Nut Handling Procedure

PRPR 13 - Control of Knives

PRPR 14 - Control of Brittle Materials

PRPR 15 - Glass & Brittle Material Breakage Procedure

PRPR 16 - Types of Allergen

PRPR 17 - Storage

PRPR 18 - Allergen Control Procedures

PRPR 19 - Food Defence System

PRPR 20 - Control of First Aid Dressings

PRPR 21 - HACCP Prerequisites

The Criteria and Methods required to ensure that the operation and control of these processes are effective are documented in the Food Safety Management System procedures and records.

These procedures are supported by second tier documents specific to each area including:

- Work Instructions
- Specifications
- Testing schedules
- Risk assessments
- Job Descriptions
- Critical Control Point Monitoring Procedures

Measurement, monitoring and review are carried out by analysis of data in key areas including:

- Critical Control Point monitoring
- Analytical testing
- Microbiological testing
- Complaints analysis
- Key Quality performance indicators
- Standard Exception Reporting
- Results of Inspections
- Results of Internal & External Audits

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### **Document Hierarchy**



### Food Safety Quality System Process Diagram



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### 4.2 Documentation Requirements

It is company policy to operate a document and record control system within the scope of the Food Safety Quality Management System and to meet the requirements of international standards ISO 9001:2008 and ISO 22000:2005.

The food safety management system documentation includes the food safety policy and food safety objectives, the procedures and records required by ISO 22000 and those documents required to ensure the effective development, implementation and updating of the

food safety management system.

All documents and records determined by the company to be necessary to ensure the effective planning, operation and control of the processes are controlled within the food safety management system.

### **Document Control Procedure**

The documentation which defines the Food Safety Quality Management System is controlled. The company operates a system of document control for procedures and standards which will enable the following activities:

- All documentation is reviewed for adequacy before approval be authorised personnel
- Document amendments shall show evidence of change or modification. Deleted words will be are denoted with strikethrough.
- Identification of reasons for changes and revision codes
- Issuing new or amended documents to point of use
- Maintaining legibility of issued documents
- Ensuring controlled status of externally sourced documents
- Identification and record disposition of obsolete documentation
- Periodic document review
- Documents are re-issued after a practical number of changes have been made
- Only approved documentation is used in the Food Safety Management System
- A Master List of documents shall be kept to identify status of all documentation.





### **Record Control Procedure**

Records determined by the company to be necessary to ensure the effective planning, operation and control of the food safety quality management system are established and maintained as evidence of system effectiveness and conformity to defined requirements.

The company operates a system of document control for records covered by the scope of the Food Safety Management System.

Records are available to demonstrate conformity to specifications and standards. The procedure enables the following activities:

Identification and maintenance of records

Each record shall be given a unique reference code. The prefix letters of the code refer to a particular kind of document, as shown below:

Food Safety Record - FSR Prerequisite Record - PRPR **Production Record** - PROR **Quality Record** - QUAR **Cleaning Record** - CLER **Purchasing Record** - PURR **Laboratory Record** - LABR **Engineering Record** - ENGR Despatch Record - DESR **Distribution Record** - DISR

Records for the specific areas are sequentially numbered and a Master List for each area is maintained by the Technical Manager.

### Checking and approval of adequacy

All records are reviewed for adequacy before approval be authorised personnel. Department Managers are responsible for the records used in their department.

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### 5. Senior Management Commitment

Senior management demonstrate clear and visible commitment to the food safety management system by establishing and implementing, then fully communicating and supporting its policies, procedures and objectives. Senior Management is committed to continually improve the effectiveness of the quality management system by regular audit, review and pro-active actions.

The food Safety Management System includes all products manufactured on site and activities conducted on site. The scope is aligned with the policies and objectives of the site and includes the commitment to fully meet the requirements of the following standards:

Quality - ISO 9001:2008 Food Safety- ISO 22000:2005

The Senior Management has a total commitment to quality observing all legal, moral and ethical codes and this is the concern of every employee.

Senior management demonstrate clear and visible commitment by:

- Establishing and implementing a Quality and Food Safety Policy.
- Communicating and Maintaining the Quality and Food Safety Policy.
- Establishing and implementing Quality Objectives.
- Communicating and Maintaining the Quality Objectives
- Establishing and implementing Food Safety Objectives.
- Communicating and Maintaining the Food Safety Objectives
- Conducting regular pro-active management reviews and communicating outputs.
- Communicating commitment to satisfying customer requirements including food safety, quality and service
- Supporting and planning the development and operation of the Food Safety Management System.
- Ensuring the food safety management system is maintained when changes are planned and implemented.

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### Appendix 1 Site Management Teams

Senior Management Team							
Job Title	Name	Role in Team					
Managing Director		Chairman					
Site Director		Dep	outy Chair				
Operations Manager		Operation	ons Reporting				
Technical Manager		Food Safety and Quality Reporting Management Representative					
Planning Manager		Planning and	Capacity Reporting				
Distribution Manager		Distribut	tion Reporting				
Maintenance Manager		Services and E	ngineering Provision				
Finance Manager		Financial Reporting					
Human Resources Manager		Resour	ce reporting				
Foo	od Safety Manag	ement Team					
FSMS Team Member	Name	Position	Qualification				
FSMS Team Leader							
FSMS Assistant Leader							
FSMS Team Members							

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### 5.7 Emergency Preparedness and Response

The company has established, documented and implemented a Crisis Management Procedure for the site, which is maintained in order to deal with emergencies which do not normally occur and cannot be dealt with using current quality and production procedures.

### **Emergency Situations and First Point of Contact**

The following Crisis Team members have been trained in Crisis Management and are the nominated first point of contact for the crisis situations described:

Fire or Site evacuation Health and Safety Manager

Utility Supply failure Engineering Manager
IT systems failure Operations Manager
Water Supply Contamination Tasknical Manager

Water Supply Contamination Technical Manager

Breaches of security Site Director
Bomb Threat or Similar Site Director
Extortion or Sabotage Site Director

Product quality or safety Technical Manager

In all cases if the first point of contact cannot be contacted another member of the Crisis Management Team must be contacted.

In real crisis situations a member of the Crisis Management Team must be contacted. The person contacted will urgently contact and assemble the other members of the Crisis Management Team. The Crisis Team will act quickly to assess the situation and formulate an action plan which is communicated to the site management. All relevant aspects of product safety, health and safety, financial effects and company image must be considered prior to recommencing production. All crisis and action resulting from crisis situations must be recorded.

If a call alleging or threatening extortion is received the person dealing with it should attempt to transfer the call to a member of the Crisis Management Team if at all possible.

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### **Purchasing**

The company has established, documented and implemented procedures for purchasing and verification of purchased materials, which are maintained in order to ensure all purchased materials conform to agreed specifications in order that the quality and safety of the end product is not compromised.

### This is achieved by:

- A defined Purchasing Procedure.
- Supplier Assurance and Approval
- Verification of Raw Materials and Purchased products
- Material and Service specifications

The scope of the procedures for purchasing and verification of purchased materials includes all purchasing activities that have an impact on the Food Safety Quality Management System

The Purchasing Department or nominated individuals purchase materials and services in accordance with the company purchasing procedures. This ensures that all purchases are against defined specifications and from an approved supplier. Authority to purchase outside of these procedures can only be authorised by the Technical Manager in writing.

Initially suppliers are used because of their historic service record including Quality Performance, Customer nomination or Price. This the starting point for an approved supplier list. With the implementation of a controlled approved supplier list, suppliers who do not reliably achieve specification are either delisted or if critical to the business, are given technical support to become reliable. New suppliers are only added to the list following successful sampling and technical approval. Customers can add a nominated supplier to the list. This nomination may be overruled where product safety could be jeopardised.

Materials and Services can only be purchased using the Approved Supplier List. Orders for materials, chemicals, packaging and ingredients are raised and consignments of approved materials are called off from approved suppliers against planned product order requirements. All chemicals purchased for use within the food handling facility are confirmed as "food grade" by the Technical Manager. The Planning Manager is

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	Took safety quality Management System
	industrial activities which pose a serious threat of contaminating food
4	Food facilities are located away from areas subject to flooding unless sufficient
4	safeguards are provided
5	Food facilities are located away from areas prone to infestations of pests
6	Food facilities are located away from areas where wastes, either solid or liquid,
0	cannot be removed effectively.
7	Periodic assessment of potential food safety impact from and to local
,	environment is performed
	Design and layout
	The internal design and layout of food buildings permits good food hygiene
1	practices, including protection against cross-contamination between and during
	operations by foodstuffs.
2	There is always segregation of high and low risk areas.
3	There is restricted access to high risk areas and dedicated clothing, footwear,
	tools and equipment.
4	Product Process flow is logical and follows a one way flow system
5	Process flow should be designed to prevent contamination
6	There are dedicated chill and freeze facilities where appropriate
7	There are segregated equipment washing facilities
8	The onsite laboratory is sited away from production areas or contracted out to
	qualified laboratories
9	Facility is appropriate for the purpose
10	Adequate security arrangements are in place with restricted access on to site and
10	control of visitors
11	Site boundaries are clearly defined
12	Pest control of the periphery is in place
13	Operator/people movement is controlled to minimise risk of cross contamination
	Buildings
1	All buildings are constructed to protect against the entrance and harbouring of
	pests.
2	Entrances are heavily protected to prevent accidental damage
3	Pedestrian and Fork Truck access is separate
4	Foundations are at least 600mm deep and sufficient to prevent rodents from
	burrowing underneath
5	Access points for pests is prevented by ensuring windows that open are
5	protected by insect screens

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The Infrastructure is modified as necessary taking into account the results of Hazard Analysis and the capability of the selected control measures to control the identified food safety hazards. The results Hazard Analysis and subsequent modifications are recorded.

### (ii). Operational Prerequisite Programmes

The company has established, documented, maintains and updates a programme of Operational Prerequisites for the site. The operational PRP(s) enable the control of food safety hazards that are not controlled by the HACCP plan by control measures, the stringency of which is determined and documented by the Food Safety Team.

Operational PRP(s) are implemented across the entire production system as appropriate. The following Operational PRP(s) have been implemented:

PRP 001 - Hygiene and Housekeeping Management

PRP 002 - Management of Pest Control

PRP 003 - Control of Visitors and Contractors

PRP 004 - Management of Cleaning

PRP 005 - Despatch and Distribution

PRP 006 - Maintenance

PRP 007 - Waste Management

PRP 008 - Hygiene Policy

PRP 009 - Glass Policy

PRP 010 - Ingredients Foreign Body Control Policy

PRP 011 - Metal Detection

PRP 012 - Nut Handling Procedure

PRP 013 - Control of Knives

PRP 014 - Control of Brittle Materials

PRP 015 - Glass & Brittle Material Breakage Procedure

PRP 016 - Types of Allergen

PRP 017 - Storage

PRP 018 - Allergen Control Procedures

PRP 019 - Food Defence System

PRP 020 - Control of First Aid Dressings

PRP 021 - HACCP Prerequisites

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This is carried out using the HACCP decision tree in the HACCP Calculator. Hazards identified at critical control points by the decision tree are controlled in the HACCP plan. Significant hazards that are not critical are implemented as operational PRP(s)

### The HACCP Calculator (See calculator guide for full details)

							<b>Decision Tree</b>			ee	
Step Num ber	Step Name	Hazards Identified	Probability	Severity	Significance	Specific Details about the Hazard	Control Measure	Question 1	Question 2	Question 3	Question 4
1	Delivery of Ingredient	Bone	3	3	9			Ν			
1	Delivery of Ingredient	Campylobacter spp.	3	3	9			Υ	Ν	Υ	N
1	Delivery of Ingredient	Contamination with Bacteria from pests	3	3	9			Υ	Ν	Ν	
1	Delivery of Ingredient	Pesticides	2	3	6						
1	Delivery of Ingredient	Salmonella spp. (S. Typhimurium)	2	2	4						
1	Delivery of Ingredient	Bacteria (spore-forming) General	1	2	2						
1	Delivery of Ingredient	Pest control chemicals	1	1	1						
N	= If control is required at this step for safety then modify step, process or product										

Question 1 - Are control measures in place for this hazard?

Question 2 - Does the step eliminate or reduce the hazard to an acceptable level?

Question 3 - Could contamination occur at unacceptable level or increase to unacceptable levels?

Question 4 - Will a subsequent step eliminate the hazard or reduce it to an acceptable level?

The HACCP Calculator highlights significant hazards and critical control points in red.

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### 7.10 Control of Non-Conformity

### **Corrections**

For each CCP and OPRP Corrections and Corrective actions when critical limits are exceeded are defined by the Food Safety Team in the HACCP documentation and plans. The HACCP team define and document the corrective action when trends indicate a likely loss of control. Corrections are applied to bring the parameters controlled at the CCP or OPRP under control and the correction instruction includes reporting requirements and action to be taken by the authorised nominated person with regards to the products produced while the process was out of control. Corrective Actions are defined to ensure the cause of the breach is identified and action is taken to prevent a recurrence. Training in monitoring procedures and records for CCP's/OPRP's and corrections/corrective actions are completed ahead of implementation.

In the case of exceeding CCP/OPRP limits, procedures and records appropriate to the handling of potentially unsafe products are followed until it is confirmed that they are safe and suitable for release. Where product is not suitable for release then this matter is reported as soon as practically possible to the Food Safety Representative. The Food Safety Team carry out regular review of the corrections carried out.

Products manufactured under conditions where critical limits have been exceeded are potentially unsafe products and are handled in accordance with the procedure for controlling non-conforming products.

### **Corrective Action**

Corrective Action is the action taken to eliminate the cause of an existing non-conformance in order to prevent a recurrence. The procedure for corrective action is managed by the Food Safety Representative (Technical Manager). This procedure defines that when Non-Conformances are raised a corresponding agreed corrective action is raised to eliminate the non-conformance and the cause of the non-conformance and that action is taken to reduce the risk of or prevent a recurrence.

Routine Corrections and Corrective Actions are initiated by authorised personnel as documented in Operational PRPs and the HACCP plan. Incidents where correction and

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which includes the Technical Manager, Operations Manager and the Site Director. In the event of a product recall the team consider contingency plans for supply of product.

Customer complaints are analysed by product and type to identify complaint trends. The annual complaint analyser tool generates longer term trend analysis. Complaint KPIs and trends are reviewed at management review meetings.

Indications of Customer Satisfaction are provided from regular Review Meetings with the Customer. This feedback is passed onto the Senior Management team by the Sales Director. Feedback is also provided as a result of Customer Audits, these are usually annually, the results of which are reported to the Senior Management team by the Technical Manager. The Senior Management team consider the feedback at the Management Review meetings and appropriate improvement plans are formulated. Customer feedback is also evaluated and assessed during the Food Safety Team monthly review.

### Responsibilities

The Customer Services Manager and Quality Manager are responsible for responding directly to Non-Critical customer complaints.

The Technical Manager is responsible for handling retailer and serious consumer complaints.

The Food Safety Team is responsible for reviewing and assessing relevant customer feedback to food safety and updating the Food Safety Quality Management system as appropriate.

The Quality Manager is responsible for analysing performance trends, for agreeing corrective and preventive action with site management and for updating the non conformance register.

The Senior Management team are responsible for reviewing complaints trends and implementing complaint performance improvement plans.

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