
The Proof of Compliance is in your Record Keeping

July 14, 2015 | Crista Francis, Manager, Food Safety | The Acheson Group
Questions/Answers

Q: Are third party auditors accepting of electronic records? Do they have preferences to the type of format?

A: Yes, auditors are aware of the digital technology available and are welcoming the data. A lot of the technology out there provides time stamping on the digital data as well which is great for the audit trail to prove that the document was not "just" created.

Q: When recording information during a production run, receiving document or shipping document is color of ink important?

A: Generally speaking ink color is not an issue, just keep it professional (black, blue, red) no wild glittery, highlighted colors. Colored ink helps to quickly determine a photocopy from an original so some regulators, USDA for instance, like to see blue. If they have a preference they will tell you.

Q: What documents must a company have from their suppliers under the documented supplier program? A: Certificates of Analysis, Letters of Guarantee, Country of Origin, Specifications, Organic Certificates, Halal Certificates, Kosher Certificates, Food Safety Program Certificates: GFSI Benchmark Scheme - FSSC 22000, BRC, SQF, etc. , Safety Data Sheets, 3rd party audit results, Supplier questionnaire, All of these as they apply to the product and anything else specific to your company requirements.

Q: What are the requirements for maintaining a live document as secure?

A: Controlled access. This requires limited access such as an independent login for each supplier or vendor so that they do not have access to anyone else's documents. If this system is being used internally the same would apply. There needs to be controls so that only authorized individuals can alter the data such as removing or deleting files, etc. You can give different credentials to people that are adding documents or data into the system. HACCP and food safety records must remain under the control of the company's qualified individual and all documents must be reviewed and stored according to the company's current written policies.

Q: Is there a best practice for document requirements of private brands vs national brands?

A: There are no differences in application to private brands vs national brands. The limitation with national brands may come into play if you are a co-packer for that brand and they have set requirements for documentation and recordkeeping in the contract. If that is the case you still must comply with your contract obligations unless of course you can meet a mutual common ground. Private label you set your own rules because you own it; with exception to the regulatory requirements

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