



VITAL an Auditing Perspective

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NCS International

A partner in Certification: **NCS** **International**

NCS International was formed in 1990 and is a wholly owned subsidiary of the peak body, the National Association of Testing Authorities (NATA). We have over 120 auditors and trainers servicing more than 3000 clients annually. We undertake more than 50 audits every day spanning across many geographical regions. With revenues in excess of \$14 million they are one of the region's leading business assurance organisations.



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QUALITY
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SAFETY
MANAGEMENT SYSTEM



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MANAGEMENT SYSTEM



CERTIFIED
FOOD SAFETY
MANAGEMENT SYSTEM



Auditor Credentials

- We have specialist auditors that audit in:

Food Safety

Coles Housebrand Supplier Program
Woolworths Quality Assured (WQA)
Metcash Food Safety Program
HACCP
ISO 22000
SQF 1000
SQF 2000
BRC Global Standard Food
BRC Global Standard Consumer Products
And more...

Quality

ISO 9001 Quality Management Systems
And more...

Safety

AS/NZ 4801 Safety Management Systems
And more...

Environmental

ISO 14001 Environmental Management Systems
And more...

- We have a wide range of accreditations including JAS-ANZ and ANSI



Food Specific Auditor Credentials

NCS International – Food Division

- Team of 25 Food Safety Auditors with various scientific backgrounds
- Within the retail market we are recognised provider of audits for Woolworths, Metcash, Coles Wal-Mart, Franklins etc.
- We take the training of our auditors extremely seriously, invest a lot to ensure our team are informed, consistent and across industry best practice
- Rigorous witness audit program



Auditors Responsibility In Representing Clients

- NCSI has two distinct groups of clients, standard owners and the suppliers we audit.
- Representing the standard owners requires us to understand the requirements of their standard fully and then audit their suppliers against those requirements. Personal beliefs of the auditor must be put aside. Audit reports must accurately reflect where the supplier met or did not meet the requirements of the standard. Copies of the audit report are then given to the standard owner and the supplier (auditee).



Auditors Responsibility In Representing Clients

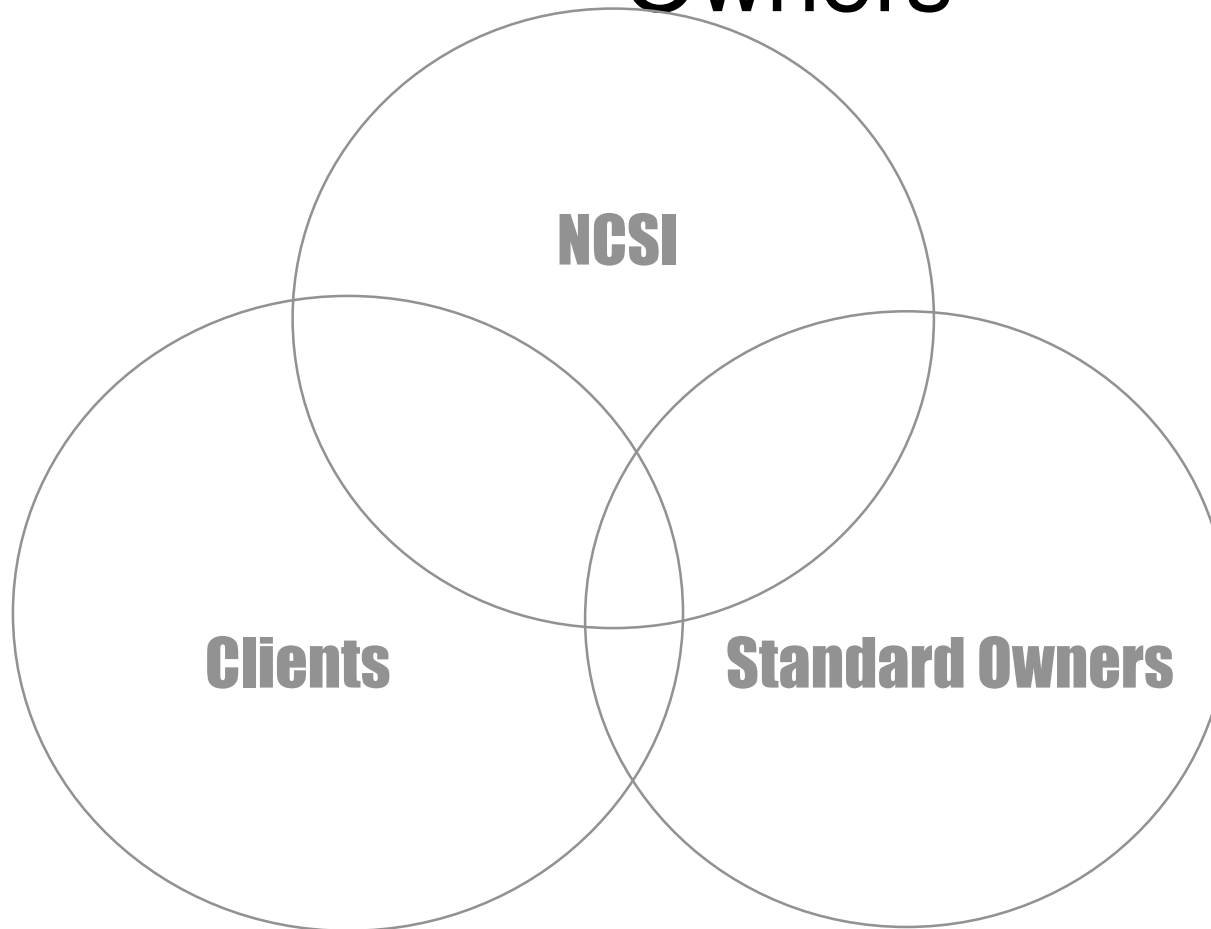
- Representing the supplier (auditee). Often their needs are different to the those of the standard owner. Still have responsibility to represent the supplier fairly and not make them feel threatened. We aim to make the suppliers feel that NCSI is their to protect their business, not threaten their business.



wegiveyoutheworld



Interdependent Relationship NCSI, Clients & Standard Owners





Things Clients Can Do Assist When Being Audited Against VITAL

- Be organised and have all documentation in a logical order.
You will need to show the auditor the following:
 1. Formulation/recipe
 2. PIF's/ Raw Material Specs protein from allergen in ppm
 3. Written documentation shows production lines have been reviewed (hang up points, conveyor lines, mixing bowels)
 4. Evidence to back up assumptions
 5. VITAL calculations
 6. Copies of labels
 7. Don't have part of this information at another site e.g. head office
 8. Details of VITAL review every 6-12 months.



Things Clients Can Do Assist When Being Audited Against

VITAL

- If supplier could not get a PIF and only has a raw material specification, make sure the spec has conclusive information about allergens. If doesn't have conclusive information, consider insisting that it be revised or adopt the worst case scenario for that allergen.
- If PIF/Raw Material Spec states that an allergen not present, cross check to the NIP information for that product. If there is protein figure in the NIP for that product, has to have come from somewhere.



Things Auditors Find Challenging With VITAL

- Where auditors have not had to work through VITAL themselves – makes it hard to audit something that you have never done.
- Determining if the information provided is sufficient. In other areas of the audit, we have built up years experience regarding what acceptable/possible – not there yet with VITAL.



How Much Time Spent Looking At VITAL

- If a client is organised, about 20-30mins per product
- Woolworths states that the number of products assessed for VITAL must be the $\sqrt{\quad}$ of the number of products supplied to them
- Normally do the VITAL assessment as part of the product assessment section in the audit



In addition to VITAL

VITAL is only used to determine risk/labelling requirements relating to cross contact.

In addition to VITAL, auditors also looking for:

- HACCP Plan – allergens considered in the hazard analysis
- Allergen Management Program – R&D, Engineering, Raw Materials, Rework, Production Scheduling, Packaging, Training, Labelling & Cleaning
- Validation of Cleaning – results will be requested



What Do You Do If You Disagree With Auditors Findings?

Contact our Technical Department who will undertake review of the findings kerry.hawkins@ncsi.com.au

If you disagree with our Technical Department, contact me. majella.furey@ncsi.com.au

If you still disagree, contact the retailer.



Work Together Create Consistency

- Fully support the development of the auditor guide
- Non prescriptive requirements lead to inconsistency in application & auditing e.g may be required, give consideration to, where appropriate
- Prescriptive requirements assist with consistency e.g. you must, you will etc



Thank you to the Allergen Bureau
for your effort

Thank you for your time today