2.3 Corrective Action

The SALSA Requirement:
“The business shall ensure that procedures exist to record, investigate and remedy the cause of any product non-compliance including complaints, incidents and sub-standard product. Records shall be available to the Food Safety Systems Review (2.2.1). The procedure shall include details of how non-conforming product will be quarantined.”

About this SALSA Requirement:
This Requirement is intended to ensure you have a system to handle Corrective Action in your business whenever non-compliances have been identified. A ‘non-compliance’ is where expected standards have not been met, typically this includes: staff not following procedures, hygiene breaches, products not meeting specification, contamination problems, customer complaints etc. You may raise non-compliances from your food safety systems review. Some non-compliances can be predicted, and clear guidance on Corrective Action can be followed e.g. a fridge breakdown or a glass breakage. You should investigate all non-compliances to understand the cause so Preventative Action can be taken to prevent it reoccurring.

**Tools**
- A procedure detailing the action to be taken when a non-compliance is discovered, how non-conforming product will be quarantined and a form to record details of your findings
- A quarantine/’On Hold’ sign for non-conforming products
- A place for storing non-conforming products e.g. roll cage, lockable box etc.
- Procedures for detailing the action to be taken in the event of a fridge/freezer breakdown, glass breakage, metal detector failure etc
- Agreed ‘preventive action’ (PA) needed to deal with the root cause
  - Who
  - What
  - By when
- Planned review of preventive action post implementation to ensure it is working the way you intended

**Tips**
- Take immediate corrective action to stop substandard product being used or sold (damage limitation)
- Train staff in handling common issues that may be experienced in manufacturing
- Encourage staff to report any issues and record the actions taken (why, what, where and when)
- Clearly label any non-conforming product and segregate it from other stock e.g. in a roll cage, lockable box or separate shelf
- Investigate all customer complaints and record details of action taken
- Monitor and check that the corrective action has been effective
- Discuss the underlying cause of the problem: ask ‘why?’ five times
- Don’t treat the symptom of a non-conformance. Identify and correct the actual (‘root’) cause
- Don’t allow recurring non-compliances to become accepted as ‘normal’ by staff
- Use your records as part of your Internal Systems Review
Additional resources:
See Tools & Tips for: 2.2.2 Results of Food Safety Systems Review.
Corrective Action is also required for: 1.4.4 Glass & brittle plastic breakages; 1.5.3 Equipment failure and 2.5 Managing Incidents.

What do I need to do to show I comply with this Requirement?
Ensure you have a clear procedure for staff to follow when and where a non-compliance has been identified. Some Corrective Actions can be predicted and clear guidance put in place for staff to follow e.g. what to do in the event of refrigeration breakdown or glass breakage.

Where a product is not up to its normal standard, you need to consider what has been the cause. It may be due to a raw material behaving differently, process equipment failure or inadequate staff training. Consideration must always be given to the safety and legality of your products when Corrective Actions are required, and where there is any doubt, it is vital that immediate action is taken to quarantine any affected product and to investigate the cause. In all cases a ‘Corrective Action record’ should be completed. Clearly state in your procedure how non-conforming product is to be identified and quarantined.

Corrective Action is required, not only to prevent sub-standard product from reaching the customer but also to prevent a recurrence, and should be put in place as quickly and safely as possible. Breakdown your approach into logical steps; best practice is to include the following stages:

1) Take short-term action to prevent any unsafe or sub-standard product being used or despatched
2) Identify the ‘root-cause’ – what led to the problem arising in the first place.
3) Discuss and agree on action to deal with the root cause – to ensure the issue will not arise again [preventative action].
4) Agree ‘who’ is going to do ‘what’ by ‘when’.
5) Finally, go back and review the preventative action a month or so after implementation, to ensure it is having the desired effect.
6) For each of the above, having a sign-off by a competent manager to confirm that part of the ‘fix’ has been completed successfully, is good practice.


When preparing for your Food Safety Systems Review (2.2.1), gather the records that detail non-compliances and Corrective Actions and include them in your review. For each ‘event’, review to ensure the cause of the problem was understood and to see if there are any trends that can be addressed or prioritised for further action.

What does a Check-sheet look like?
The examples below are an extract from a ‘Corrective Action record’ recording short-term Corrective Action. Use this as a guide to create your own records. The example provides the typical level of detail a SALSA auditor will be expecting from you to comply with this part of
2.3 Corrective Action

the SALSA Standard. You should also investigate your non-conformances further to try and identify root cause.

**Corrective Action Summary**

<table>
<thead>
<tr>
<th>Date</th>
<th>Non-Compliance</th>
<th>Cause(s)</th>
<th>Corrective Actions</th>
<th>Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>06/05/15</td>
<td>Filler breakdown – 90 mins lost time – sealing problems</td>
<td>Faulty component</td>
<td>Replacement of faulty component (component x). Product removed from line and discarded</td>
<td>09/05/15</td>
</tr>
<tr>
<td>08/05/15</td>
<td>Unacceptable cleaning of mixer identified during visual checks</td>
<td>Incorrect detergent used due to poor labelling of product</td>
<td>Re-clean mixer &amp; check labelling. Discuss options with Chemical supplier. Retrain operative.</td>
<td>09/05/15</td>
</tr>
<tr>
<td>09/05/15</td>
<td>Customer complaint – product spoilage in Product Y, Code ABC123</td>
<td>No specific cause identified</td>
<td>Replaced product and reimbursed Customer. Investigated. Product produced on 25/04/15. All paperwork checked to try and find cause. See details on full corrective action report.</td>
<td>12/05/15 Customer happy</td>
</tr>
<tr>
<td>12/05/15</td>
<td>Damaged outer boxes of product packaging materials</td>
<td>Incorrect stacking of outer boxes of packaging materials in warehouse</td>
<td>Materials still protected by box liners – no further action required. Retrain operative.</td>
<td>12/5/15</td>
</tr>
</tbody>
</table>

**Corrective & Preventative Action Investigation Form**

Date recorded: ..........................  
Due/Who Completed/ Signed

What was wrong? | No training records available for Carol X and Richard Y  
Products affected | N/A Carol and Richard have not worked with supervision since employment  
Corrective Action | Carol X & Richard Y training to be carried out & recorded.  
Completed | 12/5/15 Helen Z  
Root Cause Identified | Carol X & Richard Y’s names were not on the Training plan.  
Preventative Action | Helen to amend New Starter form to include a ‘box’ to confirm that New Starter name has been added to the Training plan.  
Completed | 22/5/15 Helen Z  
Final review | Re-check after a month: Names of New Starters from last month, Rob T and Lisa S, are on the Training plan. Action taken successful.  
Signed: ......Alf B ........ Date...28/5/15

**How can I use this example in my business?**

The example above is an extract for a typical record that would meet the Requirement adequately. You will need to develop a format that is appropriate for your business and periodically review its suitability and effectiveness, and make changes when required.