BAP Policy on Re-Audits of Processing Plants

Where the non-conformity (NC) thresholds in “F” below are exceeded, the CB is to FIRST confirm through proper review whether or not the auditor issued NC’s appropriately. And that the re-audit is not being triggered by inappropriate NCs (criticals that are really majors, majors that are really minors, or the issuance of multiple NCs for the same problem).

Where the CB determines the NCs are appropriate, the CB is to FIRST send the NC summary to BAP and state clearly in the subject line or first line of the email: NOTE – Re-audit recommended. The CB is NOT to schedule or conduct a re-audit until BAP has authorized it.

Note for farms, hatcheries and feed mills:
Re-audits of facilities other than processing plants are determined case-by-case depending on the number and nature of non-conformities. The CB is to consult with BAP where the audit outcome is of concern and indicates the possible need for a re-audit.

A. When is a re-audit necessary?

1. Where the certification committee of the CB has determined the evidence submitted for the original audit does not adequately close out the non-conformities in a way that provides confidence the applicant is in compliance with the GAA/BAP standard.

2. Where the severity and/or total number of non-conformities are too high (See “F”). In this case, the facility must FIRST SUBMIT EVIDENCE SUFFICIENT TO CLOSE THE NCS BEFORE THE RE-AUDIT IS CONDUCTED. Since the purpose of the re-audit is to VERIFY proper closure, it does not make sense to conduct the re-audit before the facility has even taken any action to correct the problem.

3. Where a new facility, as in “B” below, does not complete the entire process by 6 months from the initial audit, the facility must re-apply and have a new, complete re-audit to the full scope of the BAP standard.

4. When the GAA BAP determines a re-audit is warranted for any other reason, at its discretion. This may be as a result of concerns over the facility’s ability to meet the requirements on an ongoing basis, scheme performance monitoring results, the facility has had one or more recalls related to food safety, and etc.
B. New Facilities – Time Frames

1. New facilities must comply with the same time frames as re-certifying facilities with regard to submittal of corrective actions. (35 days maximum from the date of the audit, to submit proper evidence to close the non-conformities).

2. New facilities shall complete the entire process in a timely fashion. Where warranted, a new facility may have up to 6 months maximum from the date of the initial audit to complete the entire certification process.

3. Completion by 6 months of the original audit date of the entire process includes completion of any re-audits required for any reason, included exceeding thresholds in “F” below. All issues from the original audit and, if applicable, any re-audit, must be resolved within the time frame stated.

4. If a new facility has not completed everything by 6 months from the original audit date, the entire process is stopped. The facility must re-apply, and have another BAP audit to the full scope of the standard. (In such cases the original audit took place too long ago to still be considered current and valid).

C. Recertifying Facilities – Time Frames

1. Recertifying facilities shall complete the ENTIRE certification process no later than their recertification date. This includes any necessary re-audit.

2. An extension of up to 30 days maximum may be granted at the discretion of BAP for extenuating circumstances.

D. Re-Audit Types/Scope, and Durations

1. 1-2 Day Follow-Up Re-Audit: A follow-up 1, 1 ½, or 2 day on site verification audit limited to the non-conformities from the original audit. The purpose of this audit is to confirm, on site through observation of facility operations and objective evidence, that all of the corrective actions have, in fact, been implemented. Additionally, that they are effective, and that the non-conformities from the original audit have indeed been properly closed and facility compliance with the BAP standard, confirmed. (As stated previously this necessitates the facility submitting CA evidence by or before the 35 day deadline to ensure the overall time frames are met and the re-audit can verify actual and proper correction and future prevention).
2. **A Full 2-3 Day Re-Audit**: A re-audit covering the entire scope of the BAP standard. Required where:

- The number, nature, and level of non-conformity or repeat non-conformities are severe enough that both the CB and BAP feel the facility is clearly lacking in understanding of the BAP standard, compliance with laws, and/or has insufficient systems in place to demonstrate proper compliance.

3. **Re-Audits at GAA BAP’s Discretion**: GAA BAP may request a CB to conduct a re-audit of a time frame and scope determined by BAP. This may be due to customer complaints, traceability concerns, facility audit outcome history, regulatory detention or other regulatory action, CB or auditor competency monitoring, or any other scheme integrity matter.

The CB will determine how long the re-audit will take and who will perform them in all but the GAA BAP requested situations. In all but the GAA BAP requested cases, the re-audit should preferably be conducted by the same auditor that did the original audit. However, if business or personal commitments make it impossible for the original auditor to conduct the audit, another auditor shall be allocated to assure timely completion.

If the re-audit is not conducted within the timelines established by the CB and/or the GAA BAP, the applicant will have to start over with the re-certification process.

**E. CB Procedures for Conducting Re-audit(s)**

1. **BEFORE** scheduling a re-audit, the CB is to review the Non-conformance (NC) summary from the auditor and verify that both the number and non-conformity level, were appropriate. This includes all of the considerations stated at the beginning of this document.

2. Once the CB has reviewed the NC summary, it is to be sent to BAP.

3. The CB is to contact BAP either to:
   - a. Confirm both the CB and BAP feel a re-audit is warranted, or
   - b. The CB is to advise BAP why a re-audit is not warranted

4. Once the need for a re-audit is confirmed, the CB is to notify the facility that a re-audit must be scheduled, and the CB quotes the facility for the CB re-audit fee. (Re-audit fees shall comply with the BAP processing plant fee schedule).

5. If the applicant decides to proceed, the dates are set and the facility is to pay the CB directly.
6. The CB shall notify BAP that a re-audit has been agreed to, and the dates. Ensuring in the scheduling process that the time frames previously stated are being adhered to by all.

7. The auditor shall provide the re-audit results and NC summary to the CB within 48 hours of completion of the audit. The CB reviews. (The preparation of an audit report is described in # 9 below. In NO case shall the preparation of a report be allowed to take so long as to jeopardize the facilities ability to adhere to the mandated time frames herein).

8. BAP is notified of the re-audit outcome by the CB immediately after reviewing the results and NC summary from the auditor.

9. A re-audit report is prepared by the auditor. The re-audit report, if it is limited to the original NCs, can be either in the form of the BAP audit checklist, or can be in the form of an NC summary/CA Closure document. In any case, the re-audit report shall:
   a. Be separate from the original audit report
   b. Shall reference on the first page that it is a re-audit, and the dates of the original audit. The scope of the re-audit shall also be stated.
   c. The name(s) of the auditors that conducted both the original audit, and re-audit, shall also be stated
   d. The re-audit report shall clearly delineate each of the NCs from the original audit and what evidence was observed during the re-audit that justifies either: closing of the NC, or keeping the NC open. Evidence justifying closure shall also describe how the facility addressed root cause in the re-audit report.
   e. The report shall clearly state any new NCs and properly differentiate between new and those from the original audit.
   f. The report shall clearly state any NCs observed that are a repeat from the original audit.
   g. The auditor can either use the full BAP audit checklist and site “N/A” for clauses outside the scope, or can delete all N/A portions of the checklist, provided that the proper clause #s and subject headings are preserved. Or, as previously stated, use an NC Summary/Corrective Action Closure type of format. Whatever format is used at the discretion of the CB, all details shall be clear and the BAP clause properly referred to.

10. Where the facility fails the re-audit, the facility shall not be allowed to certify or recertify and must re-apply. The CB is to contact BAP immediately in such cases.

11. The re-audit report is sent to BAP after CB technical review and approval.
F. Non-Conformance Thresholds for Re-Audits of Processing Plants

Criteria for the quantity of non-conformities (NC) for critical, major and minor that justify a re-audit are shown below:

<table>
<thead>
<tr>
<th>Non-Conformance Type</th>
<th>Maximum Number Allowed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Critical</td>
<td>One or More</td>
</tr>
<tr>
<td>Major</td>
<td>Five or More</td>
</tr>
<tr>
<td>Minor</td>
<td>30 or More</td>
</tr>
<tr>
<td>Combined</td>
<td>4 Major and 20 Minor</td>
</tr>
<tr>
<td>Combined</td>
<td>3 Major and 25 Minor</td>
</tr>
</tbody>
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