



## QUALITY AND FOOD SAFETY SERVICES

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# RESPONDING TO A NON-COMPLIANCE

8 Steps to a Successful Deviation Resolution

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## 1. IDENTIFY THE PROBLEM



Look at the whole picture; investigate when, where, what, who, why and how. Determine if product was affected and if food safety has been compromised.

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## 2. AVOID ASSIGNING BLAME



Your first priority is to get the situation under control; identifying the root cause and any disciplinary actions (i.e. addressing behaviours, coaching etc.), if necessary, can be focused on later.

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## 3. CONDUCT AN INVESTIGATION



Inspect the area, product, packaging, personnel practices, and equipment that may be contributing to the problem. Interview employees, review records and consumer complaints, write down all details, dates, times, lot codes findings, etc. Save emails and other correspondence in case you need to go back and reference these.

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## 4. IMPLEMENT



Implement any immediate corrective actions to prevent reoccurrence and that the situation is fully under control. Further solutions and corrective measures may need to be applied after conducting a root cause analysis.

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## 5. SEGREGATE THE PRODUCT



This is where your traceability exercise practices will be useful. Crunch the numbers to make sure all input and output numbers match. Any discrepancies need to be investigated. If you determine that the incident is serious and that product has left your control, this is when your Recall Plan will be initiated.

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## 6. ROOT CAUSE ANALYSIS



Regardless of which method you use (i.e. fishbone, 5 why, is/is not), make sure you do not do this step on your own. A root cause analysis always works best when using a cross-functional team that can see the issue from all sides. This will ensure you have covered all aspects and are implementing the proper corrective and preventative actions to address the root cause. Consider whether or not this non-compliance can occur elsewhere within the system.

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## 7. ASSIGN AND COMMUNICATE THE PERMANENT/PREVENTATIVE CORRECTIVE ACTION



Actions to be taken to correct and bring the process/issue back into control and prevent reoccurrence. This can only happen after a thorough root cause analysis is completed. This may involve improving procedures, equipment modifications or other lines/processes. Communication is key to preventing the issue from occurring again and for the team, including employees on the floor, to understand the corrective actions that have been put in place.

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## 8. CONDUCT AN EFFECTIVENESS CHECK



Review corrective and preventative actions taken to determine whether they were effective. This will ensure that the issue has been fully addressed and that corrections continue to be effective.

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