



## **British Egg Industry Council**

21<sup>st</sup> December 2018

To: All Lion Code registered sites  
BEIC Subscribers  
PHA Subscribers  
PRA Subscribers  
FM Subscribers  
NSF

### **Lion Code of Practice – New auditing arrangements from 7<sup>th</sup> January 2019**

#### **Implementation date – 7<sup>th</sup> January 2019**

The following sets out the new audit arrangements to be implemented into the Lion Code of Practice (v7) from 7<sup>th</sup> January 2019.

Please also see the 'flow chart' which illustrates the new audit structure (annex 1).

### **Overview of changes**

- A representative of the Subscriber to accompany the senior management of each Lion registered site during both 6-monthly self-audits (rather than the second one as current)
- All Laying Farms to move to a 12-month independent audit frequency by the accredited monitoring agency (NSF) in 2019
- The number of unannounced audits to be increased in 2019. 10% of Laying Farm audits to be unannounced
- Where possible, the NSF assessor to complete certain paperwork elements of the Lion Code before the assessor visits the site, thereby allowing more time to assess other elements of the Lion audit when on site
- Penalties for a repeat of the same critical non-conformance and non-conformance to be escalated

This is designed to ensure that all Lion registered sites are 'audit ready' at all times, to reinforce the Lion Code's integrity and ensure that it remains the world's most effective food safety scheme for eggs.

## **Current situation**

*Critical non-conformances* – Currently, if a site (other than a Picking Centre or Pullet Hatchery) receives a critical non-conformance, it is suspended from the Lion scheme pending corrective action which is required to be signed-off by NSF. The site is then placed on a nine month 'Certificate of Conformity' (issued by NSF) and audit cycle, and a repeat audit takes place at nine months (rather than 18 months) at the site's own cost.

In addition, there is at present no penalty for sites where a repeat critical non-conformance(s) is/are found.

*Excessive (minor) non-conformances* – Currently, where a non-conformance is raised during an audit by NSF, the site is required to send the corrective evidence to close-off the non-conformance to NSF within 28 days. Failure to do this results in suspension of the site. There is therefore a need to ensure there is no repeat of these.

## **NEW requirements - The detail**

### **1. Self-audits**

The Lion Code of Practice (version 7), sections 2:A4, 3:A4, 4:A4, 5:A4, 6:A4, 7:A4 and 8:A4 currently require that: "Self-audits shall be carried out every six months. *One of the twice-yearly self-audits is to be completed in conjunction with a representative of the Subscriber (Licensee)*".

**New requirement** – the Subscriber will be required to accompany the senior management of the site in conducting both six-monthly self-audits. Any 'self-audit' carried out in 2019 onwards with no Subscriber presence will be a non-conformance at the official NSF audit.

### **2. 12-month audit cycle for laying farms in 2019**

In 2019, all Lion registered Laying Farms (LFs) are to move to a 12-month independent audit cycle (by NSF).

**The following procedure shall apply:**

#### **a. *If no non-conformances are identified***

If no non-conformance(s) - either a critical non-conformance or a non-conformance – is/are identified at the audit, the site will be issued with an 18-month 'Certificate of Conformity' by NSF and placed on an 18-month audit cycle. This introduces a risk-based element to the Lion Code of Practice and rewards compliance.

#### **b. *If a critical non-conformance is identified***

If a critical non-conformance is identified then, following suspension and corrective action being taken, the following procedure will apply:

- The LF will be issued with a six-month 'Certificate of Conformity' by NSF and receive two NSF audits at six and 12 months later, at the site's own cost.
- If no critical non-conformances and less than seven non-conformances are identified during the first 6-month NSF audit the site will be issued with a further 6-month 'Certificate of Conformity'.

- If no critical non-conformances and less than seven non-conformances are identified during the second 6-month NSF audit the site will be issued with a 12-month 'Certificate of Conformity'.
  - If no non-conformances are identified at the following 12-month audit (i.e. 12 months after the second of the two 6-month NSF audits) the site will be issued with an 18-month 'Certificate of Conformity'.
- c. If the same critical non-conformance(s) is/are identified at three consecutive audits**  
Where the same critical non-conformance(s) is/are identified at three consecutive NSF audits, the site could be de-registered from the Lion Scheme.
- d. If a non-conformance(s) is/are identified**
- If a non-conformance is identified, the site will be issued with a 12-month 'Certificate of Conformity' and the site will receive its next audit 12 months later.
  - However, if seven (non-critical) non-conformances are identified at a single audit, these will be escalated to an administrative critical non-conformance and the site will be suspended from the Lion scheme pending corrective action.
  - Similarly, where the same (non-critical) non-conformance has been identified at three consecutive audits, this will be escalated to an administrative critical non-conformance and the site suspended from the Lion scheme pending corrective action.

(If an administrative critical non-conformance is issued, section 2.b will apply).

### **3. Unannounced audits and spot checks**

During 2019, 10% of NSF audits of Laying Farms will be unannounced.

**Spot Check** - Unannounced spot checks will continue to be conducted by a different assessor than conducted the full audit. These will target certain areas of concern on selected sites.

(Despite the nature of unannounced audits, the assessor will respect the biosecurity requirements of individual sites).

### **4. Paperwork elements of the Lion audit**

Where possible, we are planning to allow for the NSF assessor to complete certain paperwork elements of the Lion Code before the assessor visits the site, thereby allowing more time to assess other elements of the Lion audit when on site.

(Please note that as the Lion scheme collects the official sample (to be submitted for Salmonella testing) on behalf of government, there is certain paperwork that can only be completed when the assessor is on site).

### **5. Training**

We are currently working on the next version of the Lion Code of Practice. This is to be amended to require that the field staff of all Subscribers attend a Laying Farm self-audit training course, which will update those conducting the Subscriber accompanied six-monthly self-audits.

The senior management of all Laying Farms will be required to attend a Laying Farm self-audit training course, provided by the Subscriber. This is designed to provide attendees with the knowledge of the self-audit form, to reinforce their understanding of the requirements.

## **6. Lion Training Passport**

Whilst participation in the Lion Training Passport scheme is voluntary at present, the Lion Code of Practice is to be amended to make registration mandatory from 1<sup>st</sup> January 2021. This, we believe, will provide sites with a sufficient lead-in time to prepare. You can find more details of the Lion Training Passport at: <http://liontrainingpassport.co.uk/>

## **Questions and Answers**

### ***Why are these changes being made?***

We believe that our customers and our consumers should continue to have total confidence in the Lion Code. This extends to how the Code is audited.

### ***Is it just Laying Farms that are to be placed on a 12-month audit frequency in 2019?***

Yes, all other sites will remain on their current schedule.

### ***I have a Certificate of Conformity issued by NSF which says that my next Laying Farm audit by NSF is not due until 2020. Why do I need to be audited in 2019?***

In 2019, all LFs are to be audited by NSF regardless of the 18-month date on your 'Certificate of Conformity'. If you received an NSF audit in the second half of 2018, you will have a 'Certificate of Conformity' valid into 2020. Your 'Certificate of Conformity' will remain valid to the date shown in 2020, subject to no critical non-conformance, or seven or more non-conformances, being raised at the audit in 2019. Upon a successful audit in 2019, you will receive a new 'Certificate of Conformity'.

### ***I had an NSF audit in February 2018 and my 'Certificate of Conformity' says my next audit is due in August 2019. When will my next audit be?***

Your 'Certificate of Conformity' will be valid until your next audit is scheduled. All LF's will be audited in 2019, so expect that your audit will be brought forward and it may be unannounced if your site is one of the nominated 10%.

### ***The assessor identified and closed-off the non-conformance(s) whilst on site. Does this / do these count toward the seven non-conformances that would be escalated to an administrative critical non-conformance and result in my suspension?***

Yes, the point here is that a non-conformance was raised during the audit and demonstrates that the site was not audit ready.

### ***I was placed on a six-monthly audit frequency due to a critical non-conformance being raised and have been invoiced for the cost of the following two audits six and 12 months later. What would happen if I do not pay the invoice?***

*The cost of auditing sites to the Lion Code of Practice is met centrally by BEIC. The exception to this is where a site has received a critical non-conformance or seven or more non-conformances and has been placed on a shorter audit frequency. BEIC believes that it is only fair to other compliant members of the Lion scheme that such sites should pay for the following two audits by NSF.*

*Failure to pay within 28 days from receiving the invoice will result in the site being suspended from the scheme until payment is made.*

**Annex 1 - Lion Auditing Framework (by NSF) for Laying Farms, effective from 7<sup>th</sup> January 2019**

