

How to Link NRs

When you link one NR to another, you should document:

- The previous NR number and date
- The **further planned action** that was ineffective in preventing recurrence of the noncompliance.
- Any discussion with plant management during the weekly meeting, concerning the trend.
- A statement in Block 10 of the NR stating that continued **failure to meet regulatory requirements** can lead to enforcement actions as described in 9 CFR 500.4.

NRs should be linked **as they are issued**. Each noncompliance that you believe is linked to a previous noncompliance should be documented as linked at the time the NR is completed. Do not link the current noncompliance to more than one previous noncompliance.

You should continue to link NRs together that derive from the same cause **until you determine that enforcement action is necessary** to bring the establishment into compliance with the regulations. When you determine that enforcement action is necessary, you should contact the District Office and always keep your supervisor apprised of the situation.

Good judgment is necessary when determining which NRs to link together. Remember to follow the thought process, gather information by asking questions, assess the information, and make a sound, supportable conclusion. Some factors to consider are:

1. How much time has elapsed since the previous NR was written?
2. Was this noncompliance from the same cause as the previous NR?
3. Were the establishment's further planned actions implemented?
4. Were the establishment's further planned actions effective in reducing the frequency of these noncompliances?
5. Is the establishment continuing to implement better further planned actions?

Linking NR Example

You issued NR 25-02 on July 1, 2002, for condensation and the establishment's further planned action was to install fans. On July 8, 2002, you again observe condensation. If you link these NRs, you should document in block 10 that the same or similar noncompliance was documented on July 1, 2002, on NR 25-02. The further planned action of installing fans was ineffective in preventing the condensation noncompliance.

Note: You can contact your supervisor if you need assistance in making this decision. The in-plant inspection team can also contact the Technical Service Center for assistance, if needed.