

## Linking Noncompliance Records (NRs)

You already covered linking NRs during Module One of the FSRE Refresher Course for Raw Products, but it is vital to document trends in HACCP noncompliance. Linkage is necessary to support further enforcement action if necessary. Use good judgment when determining which NRs to link together. Decide whether the second noncompliance is an isolated incident or a trend of noncompliance is developing.

Ask:

- How much time has lapsed since the previous NR was written?
- Was this noncompliance from the same cause as the previous NR?
- Were the plant's further planned actions implemented?
- Were the plant's further planned actions effective in reducing the frequency of these noncompliances?
- Is the plant continuing to implement better further planned actions?

The answers you glean from these questions will help you make an informed decision about linking NRs. If you need clarification, contact your supervisor or the TSC.

If noncompliances should be linked, the NRs should be linked as the noncompliance occurs. For example, the plant missed performing a verification. You document this on an NR. A week or so later, the plant again misses a verification. You refer to the first missed verification (linking) in block 10 of the NR by listing the NR number and date. If this happens again a short time later, you reference the second NR on this current NR. Therefore, NR 1 (first of the trend) is referenced on 2, 2 is referenced on 3, and so on. Each NR is the link, and your linking forms a chain of documentation for the same cause. You should document the specific further planned actions that were not implemented or were ineffective in preventing recurrence of the noncompliance.