



# WHITE PAPER

BEST PRACTICES FOR A SUCCESSFUL  
FOOD SAFETY AUDIT FOR YOUR  
LUBRICANTS



## What to Prepare for the Lubricants Portion of the Audit

Audits are more rigorous today than ever before – each one with its own set of requirements. Whether your plant is undergoing an audit for ISO (International Organization for Standardization), GFSI (Global Food Safety Initiative), IFS Food (International Featured Safety), SFQ (Safe Quality Food), AIB International (American Institute of Baking), FDA (US Food and Drug Administration) or for a customer's own internal standards, compliance has become increasingly important to your customers, consumers and to your company's brand.

When preparing for the lubricant portion of the audit, there are some key similarities that should apply to your process, no matter which audit is on the horizon. These steps come down to:

- thorough documentation
- the correct and appropriate use of your lubricants
- a working process to eliminate cross-contamination between lubricants and food products

Below is a list that can help as you prepare for the lubricant section of your audit. Be sure to consult the specific requirements for each audit to ensure any key information isn't missed.

### 1. Product certifications

You may need to prove the oils and greases you use meet the required standards.

For food-grade lubricants, there may be additional confirmation statements required around allergens, dietary restrictions, use of genetically modified substances (GMS), etc. Statements or proof of compliance against local government or faith-based certifications, such as Kosher or Halal, may be required. This task is often a matter of contacting your lubricant supplier(s) for their most up-to-date certifications.

On average, food processing plants use between 20 and 60 lubricant products. It becomes obvious that if your facility has a consolidated lubrication program with fewer lubricants and reduced the number of vendors to one, it is faster and easier to obtain the documentation required to prove compliance.

## 2. Documentation

- a. **Preventative Maintenance Schedule:** It will be important to have your internal preventative maintenance schedule on hand, to ensure your adherence to best practices.
- b. **Cross-reference Report:** Make sure you have an itemized list of lubricants you use, categorized by equipment, application and frequency of use. This information will help demonstrate to the auditor that the lubricants with the proper certifications are used in the correct applications.
- c. **Safety Data Sheets and Training Records:** Having updated copies of the lubricants' Safety Data Sheets for all products is a best practice to prove compliance for safe handling. It is also recommended to maintain your employee training records and have them on hand to demonstrate that they have been trained to properly handle and apply the lubricants.
- d. **Product Labels:** Review of product labels is necessary for due diligence, especially if you use both food grade and non-food grade lubricants in your plant. Be prepared to explain your internal system for distinguishing between the two and prevent cross-contamination. Ensure all products are labelled properly and legibly – keep in mind, it is not uncommon that during product use and handling, some labels may become soiled, damaged or the adhesive label may even fall off, especially on oily surfaces.

## 3. Safe storage and handling practices

Auditors will want to walk the floor to assess processing areas, locations where unused lubricants are stored and equipment rooms where some lubricants may be located.

In storage areas, besides the overall condition and cleanliness, they will look at the distinction between lubricants rated for incidental food contact (such as H1, HT1) from others commonly referred to as non-food grade. They will ensure that the risk of misuse of a non-food grade lubricant into an application identified as needing food grade has been identified and preventative controls are in place, since food safety is at stake.

From dedicated storage tanks with dedicated pumps, or drums with dedicated drum pumps, practices for storing and then transporting the lubricants to the equipment will help auditors in their risk assessment of cross-contamination.

Besides good identification and dedicated pumps, best-in-class storage areas will have devices to maintain product integrity while in storage and ensure clean oil is put into service, such as desiccant breathers on drums and bulk tanks to prevent airborne contamination, filtration and air-tight transport containers.

## Ongoing Best Practices

### Standard operating practices for food safety audits

Food safety audits are much less overwhelming when your team is prepared. That's why it's best to incorporate these steps into your standard operating practices:

- Regularly monitor your operating environment, documenting how you have identified and fixed potential lubricant cross-contamination areas
- Keep an ongoing list of the lubricants you use (their full names), where each is used and their respective volumes per application
- A robust inventory management process for ongoing lubricant lifecycle management
- Document ongoing, internal safety initiatives (e.g. routine review of safety data sheets and certifications)
- Conduct regular mock audits to identify and fix any problems well in advance of an actual inspection. You can hire a third party or have an internal expert complete this task.

## Petro-Canada Lubricants Documentation & Credentials

### Petro-Canada Lubricants Documentation & Credentials

If you're a Petro-Canada Lubricants customer, we've gathered our documentation and credentials below to make your preparation process a little easier:

- Technical data sheets
- Safety data sheets
- Halal certificates
- Kosher certificates
- NSF 3H, H1, HT1 and H2 registration letters
- Allergen statement
- GMO (genetically modified organisms) statement
- ADI (animal derived ingredients) statement
- Lubricant handling and storage