Business Assurance

Beyond Certification: Closing Gaps with Compliance and Quality

Jennifer Lott & Jennifer Evans | September 2026

Service, Solutions, Sustainability

What the CPA offers today!

- The voice and source for those looking for Contract Packaging and Manufacturing resources since 1992
- Leader in increasing the knowledge and expertise within the contract packaging industry and their customers
- Encourage the effective use of contract packaging services via innovation and flexibility
- Increase the industry profile, capabilities, innovation of its members

CPA
THE ASSOCIATION FOR CONTRACT PACKAGERS & MANUFACTURERS

MORE Leading CP/CMs are CPA Members

- **MORE RFQ**

OVER 90
RFQ / MONTH
2018 Avg

- **MORE growth**

11.9% CAGR
5-year

- **MORE networking** opportunities with hundreds of industry executives

UP TO TEN
EVENTS
per year

- **MORE education and training** opportunities for your entire team

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CONTRACT PACKAGERS & MANUFACTURERS

CORE MEMBER BENEFITS

INDUSTRY EXPOSURE

Pack EXPO

- **Resource Center**
- **PE Forum**

Conferences

CPA Magazine

NETWORKING

CPA Annual Meeting

PACK EXPO Meet & Greet

Open & collaborative community

Regional Meetings

EDUCATION

Webinars

Associate Member hosted events

Industry partner education

State of the Industry report

CPG RFQ

> 1,100 annually

Online member directory – 4000+ unique visitors per month

The go to source for CP/CM's.

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UPCOMING CPA EVENTS

October 7-9
NACS Show 2026, Las Vegas. Booth C 3568

October 18-21
PACK EXPO International, Chicago. Booth N-4486

November 16
Brand and Manufacturer Partnerships that Work and **CPA/CFBN Reception**
PLMA, Chicago

February 16-18, 2027
ENGAGE 2027
Hilton Orlando Lake Buena Vista

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Thank You

contractpackaging.org

Speaker

Jennifer Lott

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Jennifer Lott, Senior Director of Tailored Solutions at SGS, leads the development and delivery of customized food safety, quality, regulatory, and supply chain assurance programs. She has extensive experience supporting food, beverage, packaging, pet food, and dietary supplement organizations in strengthening management systems, preparing for certification, improving supplier oversight, and addressing emerging regulatory requirements.

Jennifer Evans

Regional Sales Manager,
SGS North America
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Jennifer brings 10 years of experience in food safety, quality management and client partnership. Her experience and commitment to quality and consumer protection make her an outstanding addition to our organization, and she strengthens our commitment to supporting clients across the Southeast region.

SGS at a glance

Global service, local expertise




Industry leader

100,000 employees

2,500 offices and laboratories

10+ global industries

Wherever you are, whatever your industry, our experts worldwide provide specialized solutions to make your business faster, simpler and more efficient.

SGS Food Capabilities Overview

Testing

- Safety & contamination
- Microbiological
- Chemical
- Physical
- Sensory
- Nutritional analysis
- Non-GMO
- Allergens
- Pesticides and veterinary residues
- R&D and special projects
- Technical support/consultation
- Clinical trials

Certifications, Audits and Inspections

- GFSI-recognized schemes
- HACCP, GMP, ISO 22000
- FSMA FSVP & VQIP
- ESG & SMETA
- Customized audits
- Tailored Solutions
- BAP, ASC, MSC
- Animal Welfare
- Gluten-free, Vegan & Vegetarian, Kosher
- Inspections, Supplier audits

Digital & Innovation

- Food origin and integrity
- Advanced molecular testing
- Isotopic analysis
- Remote auditing
- Supply chain management – SGS Compass
- FSMA 204 Traceability (TRAKKEY)
- Eezytrace
- Realize Food Safety Culture Program

Regulatory Support

- Digicomply & Agroknow - SGS FoodNexus (compliance management system)
- Label compliance reviews
- Horizon scanning & risk monitoring
- FSMA (US regulation and import)
- GRAS and NDIN Assessments
- Claims and compliance

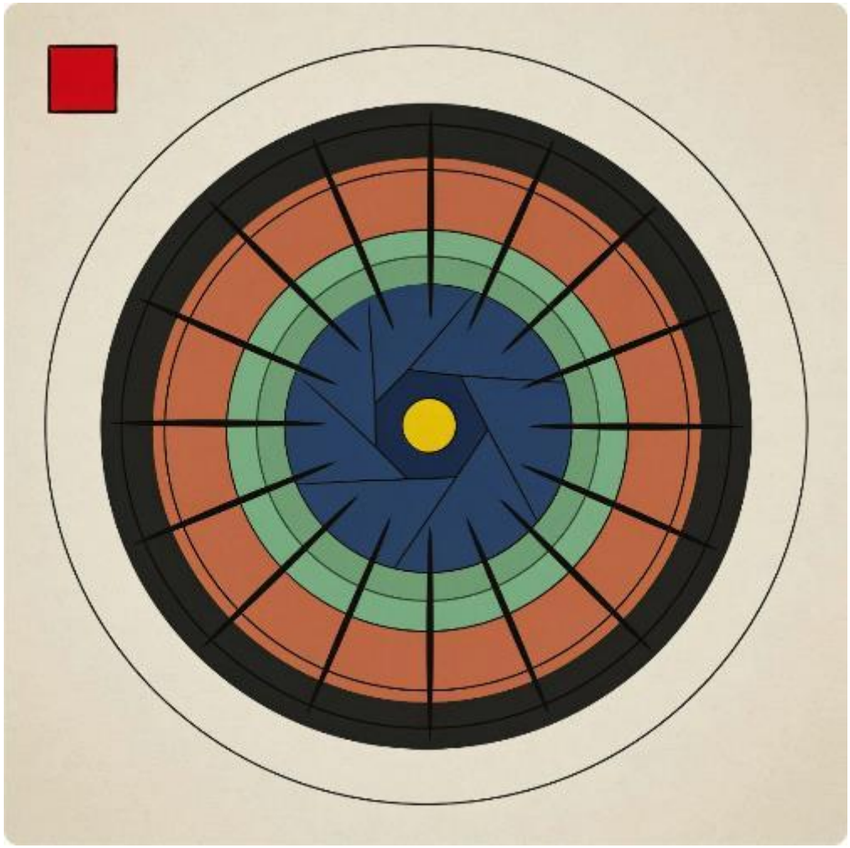
Training

- Face to face
- VILT (virtual instructor led training)
- E-learnings
- Food Safety Culture

The Audit Is Just a Snapshot

An audit captures compliance at a single point in time. But food safety and quality risk doesn't pause when the auditor walks out the door.

For contract packagers and manufacturers, **the highest-risk window is often between assessments** - when corrective actions stall, suppliers change, and conditions quietly shift.



The Gap No One Is Watching

Between audits, risk accumulates - slowly, invisibly, until the next assessment reveals what should have been caught months earlier.

Where Risk Grows Between Audits

Open Corrective Actions

CAPAs that remain unresolved or unverified long after the deadline.

Supplier Changes

New or substituted suppliers introduced without full qualification.

Specification Updates

Revised customer specs that haven't propagated through the system.

Employee Turnover

Knowledge gaps created when trained personnel leave without handoff.

Recurring Issues

The same nonconformity appearing across multiple customers or product lines.

What This Webinar Covers

1. Moving Beyond the Audit Cycle
   - How to build a continuous view of risk using data you already collect.
2. Recognizing Early Warning Signals
   - Trends in CAPAs, complaints, and operations that indicate rising risk.
3. Managing Multiple Customer Requirements
   - Maintaining one coherent internal system without duplication.

Learning Outcomes

01

Identify Between-Audit Risk Sources

Recognize the conditions and changes that allow risk to develop after an assessment.

02

Spot Trends as Early Indicators

Read corrective actions, complaints, and supplier data as signals — not just records.

03

Apply Risk-Based Prioritization

Determine which findings and changes require escalation versus routine follow-up.

04

Harmonize Customer Requirements

Build one internal system that satisfies multiple customers without redundancy.

05

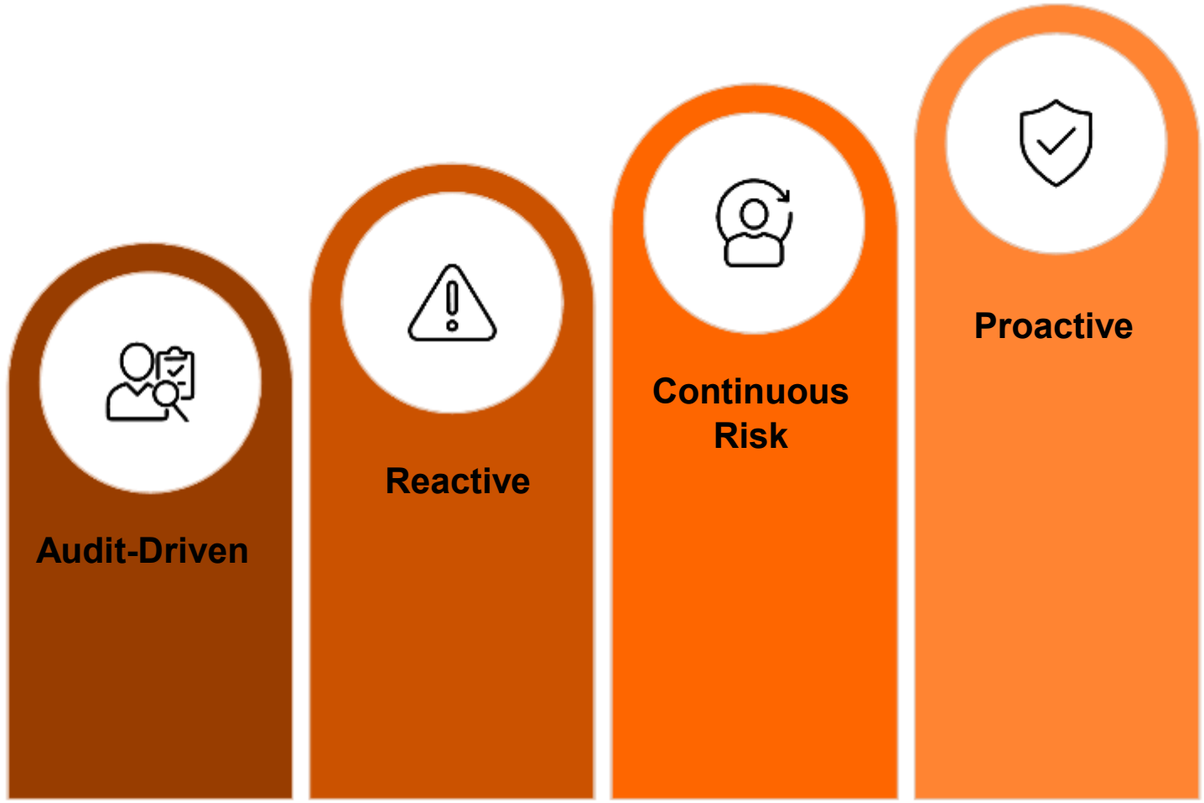
Leverage Existing Data

Use audit and operational records more effectively to prevent repeat findings.

Risk Doesn't Wait For The Next Audit.

The question isn't whether risk is accumulating - it's whether your system is designed to catch it in time.

Part 1 Moving Beyond an Audit-Driven Approach



Most compliance programs are structured around audit cycles. Findings are documented, CAPAs are assigned - and then attention shifts until the next assessment is scheduled.

A **continuous risk model** treats every piece of operational data as an input, not just an audit output. The goal: identify where risk is building *before* it becomes a nonconformity.

Data You Already Have - But May Not Be Using

Audit Findings & CAPAs

Open corrective actions, repeat nonconformities, and verification records.

Customer Complaints

Complaint volume, categories, and whether root causes were truly resolved.

Supplier Performance

Incoming rejections, late deliveries, and qualification status changes.

Operational Changes

New lines, reformulations, shift changes, equipment modifications.

Internal Monitoring

Environmental results, CCP data, pre-op records, and internal inspections.

The goal is integration — connecting these data streams so that patterns become visible across functions and customers.

Part 2 Early Warning Signals: Reading the Data

Trends in routine operational data often signal rising risk weeks or months before a formal audit identifies the problem.

Corrective Actions: More Than a Tracking Log

Age of Open CAPAs

Long-overdue actions signal that root causes haven't been addressed.

Repeat Nonconformities

The same finding appearing twice is a system failure, not a one-time error.

Verification Gaps

Closed CAPAs without documented effectiveness checks carry hidden risk.

Complaint Trends as Risk Signals

Individual complaints are investigated. But **complaint trends across customers or products** often reveal systemic issues that individual investigations miss.

- Is the same defect type appearing across multiple SKUs?
- Are complaints clustering around a specific line, shift, or supplier?
- Are complaint rates rising even when each individual case appears resolved?

Supplier Performance: Watching the Inputs

High Risk Signal

Increased incoming rejections, failed COAs, or unqualified substitutions entering the supply chain.

Watch Signal

Delayed deliveries, incomplete documentation, or a supplier under new ownership or management.

Stable Signal

Consistent performance history, current approval status, and no recent specification changes.

Risk-based supplier monitoring means knowing which suppliers warrant heightened scrutiny - and acting on those signals before a production issue occurs.

Operational Changes That Create Unplanned Risk

1

Change Occurs

New equipment, reformulation, line expansion, or workforce change

2

Risk Goes Unassessed

Change is managed operationally but not evaluated for food safety or quality impact

3

Gap Emerges

Controls, training, or specifications lag behind the new condition

4

Audit Finds It

The next assessment surfaces what a robust change management process would have caught first

Part 3 Applying a Risk-Based Approach to Follow-Up

Not every finding carries the same weight. A risk-based approach means directing attention, verification, and escalation where they matter most.

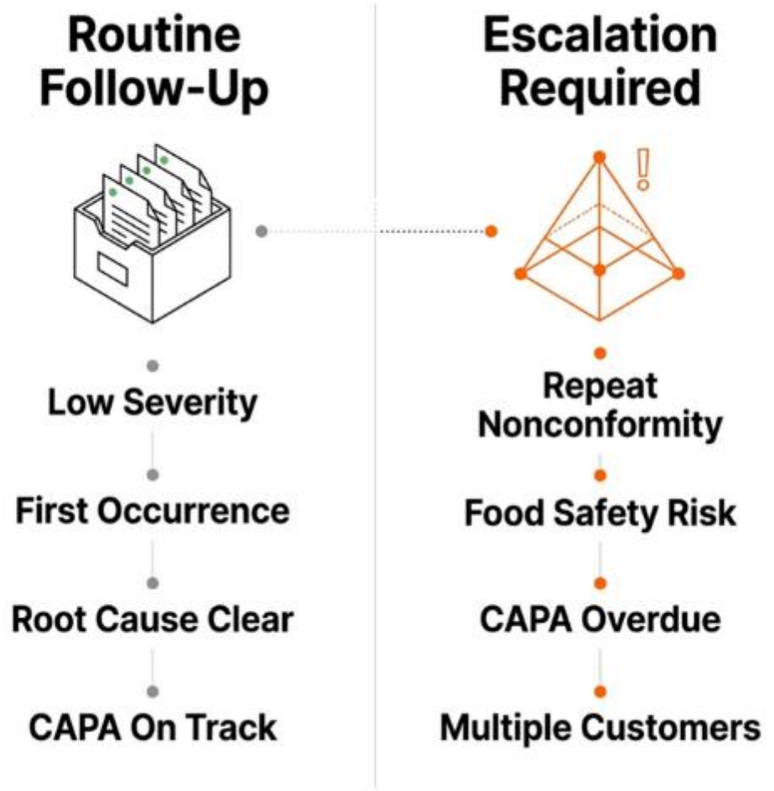
The key questions to ask:

- What is the **potential severity** if this issue continues?
- How **likely** is it to recur based on history?
- Has the **root cause** been genuinely addressed?
- Is this finding **isolated or systemic?**

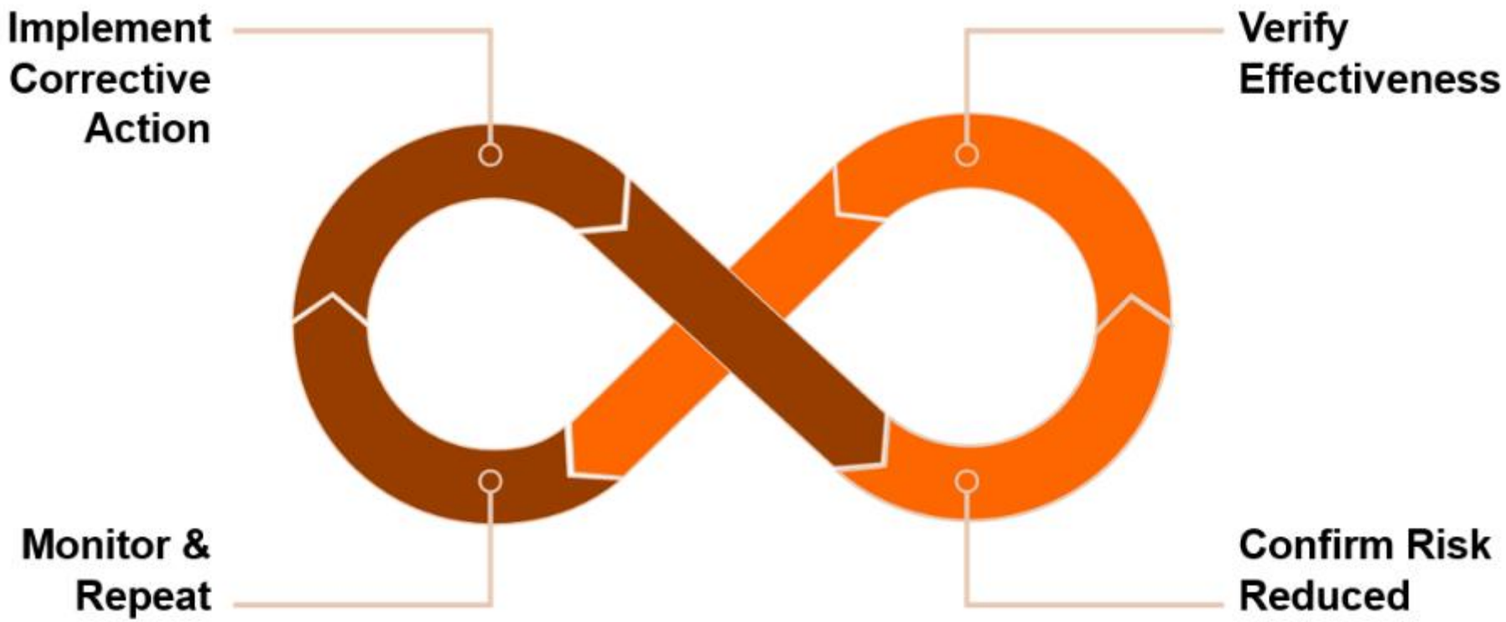
Escalation vs. Routine Follow-Up

Most organizations track findings. Fewer have a consistent, documented protocol for determining **when a finding escalates** from routine follow-up to leadership attention or customer notification.

Defining escalation criteria in advance removes ambiguity - and ensures the right people are informed at the right time.



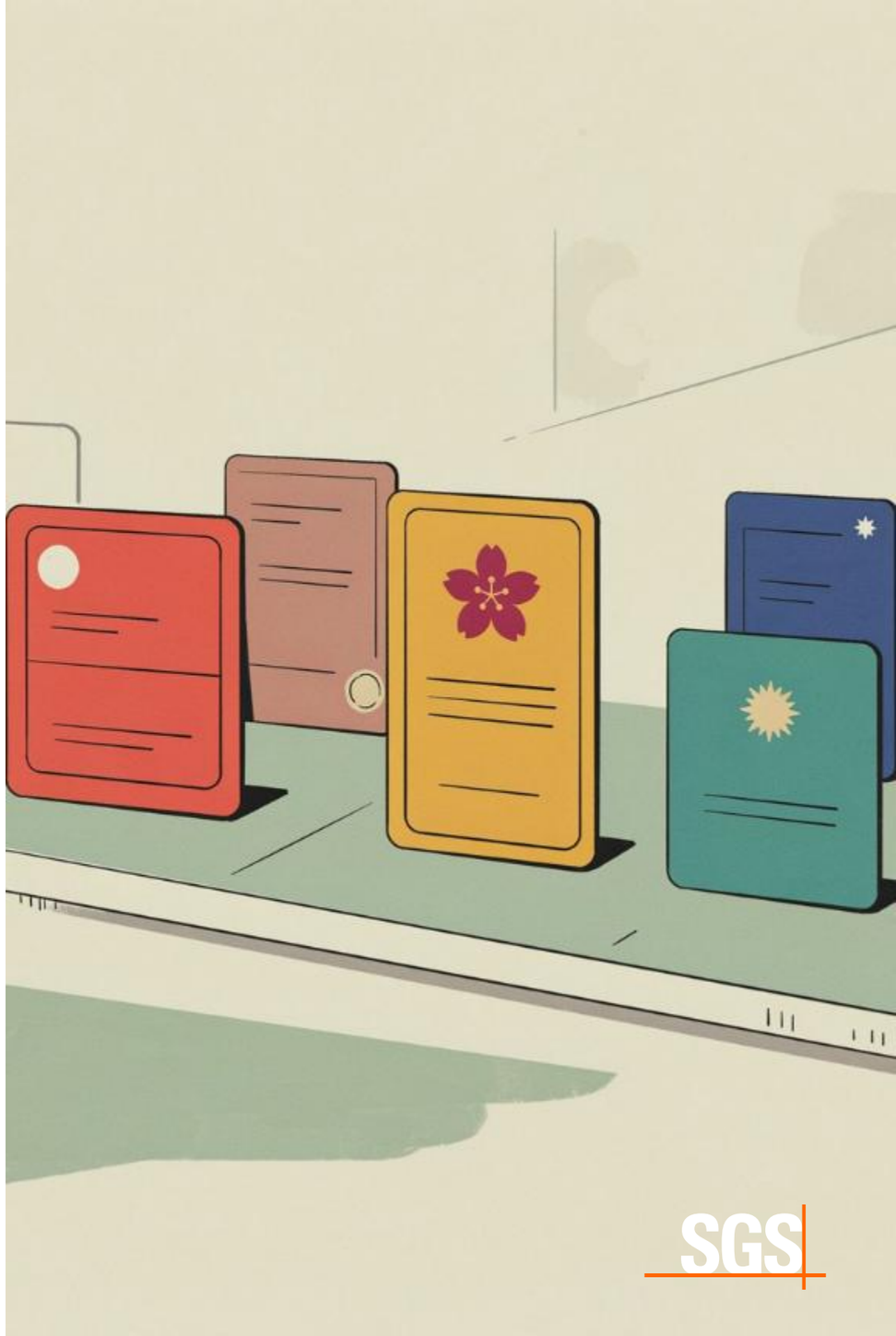
Verification: Closing the Loop



A CAPA that is assigned and closed - but never verified - offers no actual protection. Effectiveness verification is what transforms a paper record into a genuine risk reduction.

Part 4 The Contract Packager Challenge

Contract packagers operate at the intersection of multiple customer programs, standards, and expectations - often simultaneously. Managing each in isolation creates fragmentation, duplication, and gaps.



One System. Many Customers.

The goal is not a separate compliance program for each customer. It is **one internal system** robust enough to satisfy all of them - with clear visibility into where customer-specific requirements differ.

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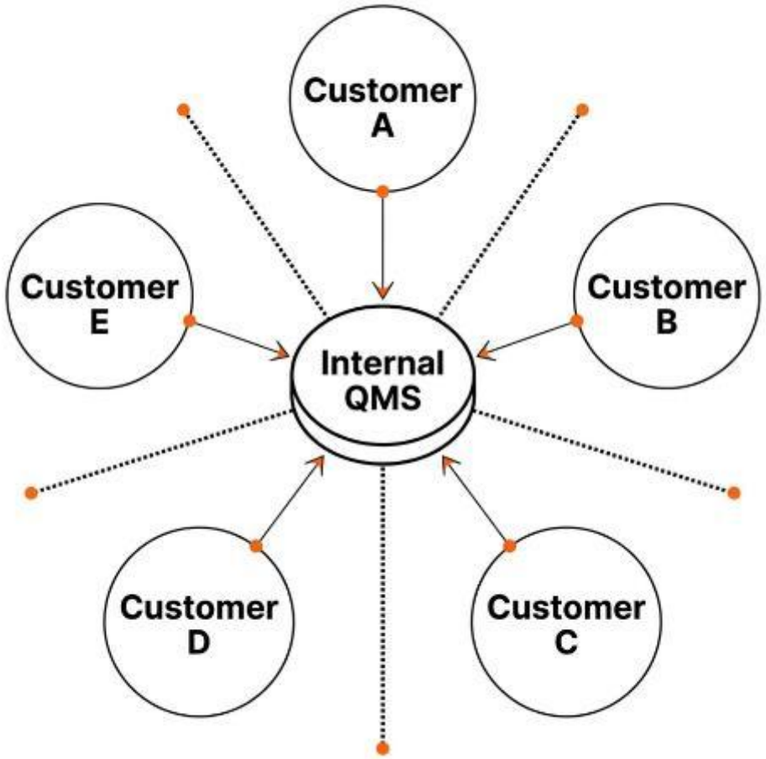


Avoiding Common Fragmentation Traps

Siloed Customer Files

Maintaining entirely separate records per customer makes cross-customer trend analysis nearly impossible.

Duplicated CAPAs

The same root cause logged separately for each customer means the systemic fix is never identified.

Inconsistent Escalation Standards

Applying different thresholds for different customers undermines the reliability of the entire system.

Audit-by-Audit Training

Preparing staff for each individual customer audit rather than building sustained competence.

Part 5 Avoiding Common Fragmentation Traps

Most organizations are data-rich and insight-poor. The information needed to manage between-audit risk is almost always already being collected.

The gap is typically in **how that data is reviewed, connected, and acted upon** - not in whether it exists.

From Data Collection to Risk Visibility

Collect Consistently

Ensure CAPAs, complaints, supplier records, and monitoring results are captured in a structured, retrievable format.

Connect Across Functions

Link findings from operations, QA, procurement, and customer service to identify patterns that no single team sees alone.

Review Periodically

Schedule regular cross-functional reviews - not just in response to incidents - to surface trends before they escalate.

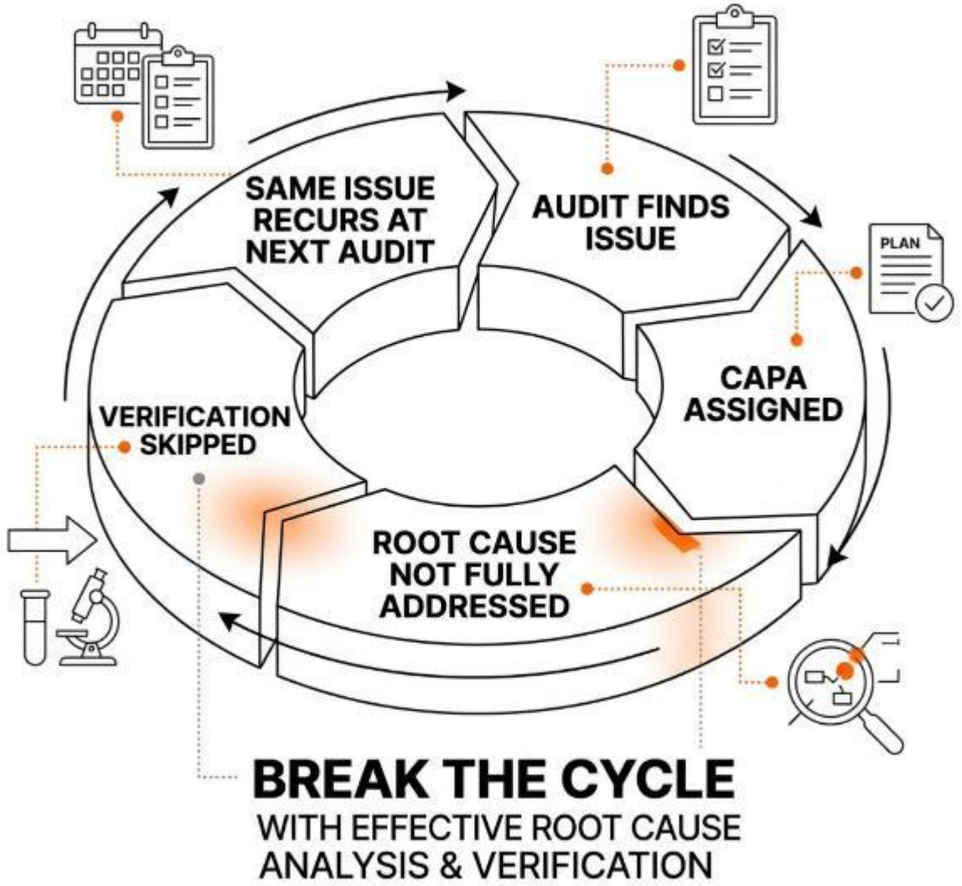
Act on the Signal

Translate trend data into prioritized action - before the next audit confirms what your data already told you.

Reducing Repeat Findings

Repeat findings are the clearest evidence that the system is treating symptoms rather than root causes. They also represent the highest reputational and customer-relationship risk in the next assessment.

Breaking the cycle requires **genuine root cause analysis**, documented verification, and a scheduled look-back before the next audit - not after.



Key Takeaways

Audits Are a Starting Point

Compliance doesn't end when the auditor leaves. Between-audit risk management is where the real work happens.

Trends Tell the Story

CAPAs, complaints, supplier data, and operational changes are early warning signals - if you're reading them together.

Prioritize with Risk Logic

Not every finding needs the same response. Define escalation criteria and verify effectiveness consistently.

One System Wins

Contract packagers need a unified QMS that accommodates multiple customers - not a separate program for each one.

SGS North America Food Laboratory Network

FOR MORE INFORMATION

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Thank you!

Do you have any questions?

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