

Edition 8 - FAQs

Timing

1. When will edition 8 of the Code be active?

The implementation date for edition 8 is scheduled for January 2nd, 2018. This is the date that all certification audits, recertification and unannounced recertification audits will commence under the SQF Code, edition 8. Any audit that is scheduled to commence on or after January 2, 2018 will be required to be audited against Edition 8 of the SQF Code.

2. Can we use edition 8 of the Code prior to the implementation date of January 2nd?

Any audits scheduled prior to January 2, 2018, will be under edition 7.2. There will be no exceptions.

3. Where can I download Edition 8?

Edition 8 can be found on the SQFI website at www.sqfi.com/documents. All previous versions of the SQF Code can also be found by following that link.

4. Our initial certification audit is in 2017 under edition 7.2. Will I have to recertify to edition 8 in January once the Code is implemented?

If a site is audited against edition 7.2 in 2017, then their recertification audit date will be conducted twelve months from their initial certification audit against edition 8. There is no need to have an audit prior to that date against edition 8.

5. Will our unannounced audit is scheduled to be conducted in 2018, will it be to edition 8?

Unannounced recertification audits scheduled for 2018 will be under edition 8.

6. How much documentation is required to update our current SQF system to edition 8? For example, should my system review be against edition 7.2 or edition 8?

Any auditors auditing against edition 8 of the SQF Code will be required to audit against all requirements (new and existing) that are contained in edition 8. Sites should evaluate their systems to ensure they meet the requirements of edition 8. It is recommended that there be at a minimum of 90 days of documentation to support any new program or requirement however that is not a requirement. The actual number depends on the program, policy or procedure that is being implemented.

7. What languages will the Codes be translated? When will that be available?

Edition 8 of the SQF Code will be available in 5 different languages:

- English
- Chinese
- Japanese
- Spanish
- French Canadian

English is currently available on the SQFI website (sqfi.com) and the remaining languages are to be translated and available by July, 2017.

Levels

Overview and Summary:

Food Safety Fundamentals

- Formerly Level 1
- Entry level for new business
- HACCP not required- Not GFSI benchmarked
- Applicable modules are 7, 11, 12 and 13

Food Safety Code

- Formerly Level 2
- Primary Production- FSCs: 1, 3, 5, 6 (modules 5, 6, 7, 7H, 8)
- Manufacturing- FSCs: 4; 7-22; 25*; 31-34 (modules 3, 4, 9, 10, 11)
- Storage and Distribution- FSC: 26 (module 12)
- Manufacture of Packaging Materials- FSC: 27 (module 13)
- Retail- FSC: 24- NEW (module 15)

Quality Code

- Formerly Level 3
- System elements specific to quality
- Can be conducted with or without the food safety audit
- Results will not affect the score of the food safety audit
- Not available for Food Retail

8. What is the difference between the modules and the Food Safety Codes?

Modules are the good industry practices that are specific to the industry sector. The modules contain the good agriculture practices, good manufacturing practices, good distribution practices, and good retail practices that the site shall meet in order to achieve SQF certification. To determine the appropriate the module the site shall refer to any of the SQF Codes, Edition 8, Part A, Section 1.2.

The Food Safety Code is the site-specific reference that outlines the requirements that each site shall meet when implementing and maintaining the SQF Code requirements.

9. What is the best way to determine which food sector category and modules apply to my site?

The best way to determine which Food Sector Category bests fits your site, please reference the Food Sector Category list and description listed in any of the SQF Codes, Edition 8, Appendix 1. This list identifies the category and provides descriptions, product examples and relevant modules. It would be best to consult with your certification body to confirm the designation of the site's food sector category.

Quality Code

10. Will current level 3 sites remain to be certified or do they have to be certified to the Quality Code?

Sites that are currently level 3 and require re-certification before 2nd January 2018, shall be audited against level 3 of the SQF Code, edition 7.2. However any re-certification audits on or after 2nd January 2018 shall be to the SQF Quality Code in association with the relevant SQF Food Safety Code.

11. If a site does not pass the quality code, can they still be certified to the food safety code?

Certification to the SQF Quality Code is independent of certification to the SQF Food Safety Code, even if the audits are conducted concurrently. Certification to the SQF Food Safety Code is not dependent on passing the SQF Quality Code.

12. We currently are level 3 and operate under modules 2, 11 and 12. With edition 8 which Codes would I need to use in order to maintain the same level of certification?

This site will be required to meet the requirements of the SQF Food Safety Code for Food manufacturing, the SQF Food Safety Code for Storage and Distribution, and the SQF Quality Code for any audit on or after January 2nd 2018. While this may seem daunting, the system elements are similar for Manufacturing and Storage and Distribution, and there will be a combined checklist for modules 11 and 12.

13. Is the Quality Code a separate audit?

A certification or re-certification audit of the SQF Quality Code can either be an extension of an audit to the appropriate SQF Food Safety Code, or a stand-alone audit conducted at any time during the currency of the site's certification to the SQF Food Safety Code. The choice is up to the individual site.

14. Is the Quality Code mandatory to meet my retailer's requirement for obtaining a certification through a GFSI Benchmarked Certification Program?

GFSI only benchmarks food safety. SQF, edition 7.2 is benchmarked at level 2, and it will only be the SQF Food Safety Codes that re submitted for benchmarking. It is up to each individual retailer to decide whether they require certification only to the SQF Food Safety Code or to the SQF Quality Code also.

15. What is the expected audit duration for the Quality Code audit?

SQFI expects a certification or re-certification audit to the SQF Quality Code, combined with a certification audit to the SQF Food Safety Code to add a minimum of half a day, while a stand-alone quality certification audit will be a minimum of one day.

16. Will a separate certificate be issued for the Quality Code?

Yes, certification to the SQF Quality Code will result in a separate SQF Quality Code certificate.

17. Will ISO 9001:2015 be considered an equivalent to the SQF Quality Code?

If a site is already certified to ISO 9001, they may not need to also be certified to the SQF Quality Code. The two are not equivalent, but it is up to the site to decide whether both certifications are required.

18. Will the Quality Code be included in the unannounced audit?

A stand-alone Quality audit will not be unannounced. The Quality audit will only be unannounced if conducted with an unannounced audit of the SQF Food Safety Code.

19. What is SPC?

SPC is statistical process control. It is a requirement of the SQF Quality Code that SPC, or other appropriate quality tools, are used to reduce process variation and drive root cause analysis of non-conformities.

20. In the Quality Code, 2.1.2.5- competency in SPC is required. Is there completion of an SPC course considered competent?

Completion of an SPC course will certainly assist, but the important aspect is being able to take the learnings from an SPC course and apply them to a particular work environment.

21. Will auditors for the Quality Code be treated as a separate credential?

The requirements for auditors of the SQF Quality Code will be published shortly. There will be additional requirements over and above those for SQF food safety auditors.

22. Section 2.4.7.1 of the quality codes calls for a positive release program. Is that a blanket "shall" requirement, or will it be based on risk?

"Positive release" is a 'shall' requirement, but the extent of the positive release program will be based on risk. The intent is to ensure that all distributed product complies product specifications, sensory, packaging and package integrity, labelling, delivery and service requirements, depending on need and risk.

23. Do you have to use the term "CQP"? As long as it meets the requirements of being a "CQP" can it be termed something else?

Other terms can be used as long as the term CCP is NOT used to identify critical quality points. CCPs must be reserved for food safety critical control points.

Scope of Certification

24. Does my warehouse have to be part of my scope of certification or is that a different audit?

If your warehouse is used for storage of materials, packaging materials, work-in-progress, or finished goods that are associated with your manufacturing site, they are covered in the SQF Code for Food Manufacturing. The SQF Code for Storage and Distribution only applies to stand-alone warehouses for goods in transit.

25. Do we need to be audited to both Food Safety Fundamentals and the Food Safety Code for Manufacturing (ie. Level 1 and 2)?

No, SQF Food Safety Fundamentals is separate certification for small or developing food businesses. It does not include HACCP and covers GMPs only. It was formerly Level 1

26. Since we are a manufacturer and have storage and distribution capabilities, are we required to follow the storage and distribution guide book?

If your warehouse is used for storage of materials, packaging materials, work-in-progress, or finished goods that are associated with your manufacturing site, they are covered in the SQF Code for Food Manufacturing. The SQF Code for Storage and Distribution only applies to stand-alone warehouses for goods in transit.

27. Can module 5 suppliers audit against Food Safety Fundamentals?

Yes, they can. Module 5 sites should use the system elements from SQF Food Safety Fundamentals, along with module 5, which is in the SQF Food Safety Code for Primary Production

28. Does my retail outlet store need to be included in my scope of certification if I am a manufacturer?

If your retail store is included in your certification, then fsc 24 should be included in your scope of certification. If this is the case, then from January 2nd 2018, you will need to be certified to the SQF Food Safety Code for Food Manufacturing and the SQF Food Retail Code.

29. Instead of saying that we are Level 2 certified, we are now going to be considered Food Safety Code certified??

Yes, from 2nd January, all sites will be audited and certified to the relevant SQF Food Safety Code

Resources and Tools

30. What is a guidance document?

SQF issues guidance documents for some modules to assist sites and auditors interpret the SQF Code requirements. Guidance documents for edition 7.2, modules 2, 11, and 13 are available on the SQF web-site under archived materials at <http://www.sqfi.com/documents/>

31. Will there be guidance documents for the different modules?

SQF will be updating all the current guidance documents to reflect the changes in edition 8. These changes will be completed by July. Additional guidance will be available for the remaining modules by the end of the year.

32. When will the Key Change Log be available?

The key change documents are now available on the SQF web-site at <http://www.sqfi.com/documents/>

33. When will Edition 8 Audit Checklist be available for purchase?

The Excel checklist to edition 8 is completed and available for free on the SQFI website. The printable audit checklist will be available for purchase by May.

General Questions- Part A:

34. Is the unannounced audit voluntary?

The unannounced audit protocol has not changed from edition 7.2 to edition 8. Sites are required to have an unannounced audit within every three certification cycles. The only addition to edition 8 is in the option for sites to volunteer for annual unannounced recertification audits. If sites elect to participate in an annual unannounced recertification audit, their certificate will indicate them as an SQF Select Supplier. Reference, SQF Edition 8, Part A, Section 4.7.

35. As there been a change in audit duration?

There were slight changes to the Audit Duration Guide outlined in the SQF Codes. Keep in mind that the tables that are included are only guides and the actual times will vary depending on the size of the facility and the scope of the audit. Below is a summary of the changes.

- Provision for sites that have 10 people or fewer
- Modification of the audit duration table to accommodate for the Primary and Storage and Distribution Food Safety Code
- Quality Code does not contain an audit duration table as the audit time may vary depending on the various factors.

36. When will SQF submit Edition 8 to GFSI for benchmarking?

SQF will be submitting edition 8 of the SQF Code within the next two months. It is expected that the process will take 3-6 months from the time the application has been submitted.

37. Has the definition of Contract Manufacture and Contract Service Supplier changed between edition 7.2 and edition 8?

There was no significant definition or code for contract manufacturers or contract service providers in edition 8.

38. Will the opportunity exist to increase an audit score if NCs are corrected, similar to what is done in the PrimusGFS standard?

The audit score, rating and methodology remains the same between edition 7.2 and edition 8 and the score does not change with the implementation of the corrective action. Sites that receive a C rating will have the opportunity to change their score based on the results of the surveillance audit.

39. Are all surveillance audits unannounced? If we receive a C (Comply) rating, will the surveillance audit be unannounced?

Surveillance audits will not be unannounced. If a site receives a C rating, the surveillance audit shall be conducted within 6 months from the last day of the certification or recertification audit (Reference: SQF Code, edition 8, Part A, Section 4.2).

40. Are corporate audits required? Can an auditor require a corporate audit based off the findings from the site audit?

Corporate audits are only conducted by mutual agreement between the food business and the certification body. They cannot be mandated by the auditor. However if a site refuses the auditor access to documentation that is “held at Head Office”, the auditor will be required to note that on the audit report and may raise a non-conformance.

41. What does the new addition for auditing all operational shifts, if applicable, mean to my site? What if sanitation is limited to a monthly basis? How would this work?

“The site audit shall include a review of all operational and cleaning shifts and pre-operational inspections, where applicable.” Where possible, the review is expected to be a visual review by the auditor. If this is not possible, then certainly a review of documentation and records may be considered for low risk sites.

42. What is meant by dry coffee and tea? Does that include instant or powdered and coffee beans?

Yes, “dry coffee and tea” applies to instant or powdered coffee, dry roasted coffee beans, leaf tea (all tea types), tea bags, coffee bags, etc

43. What is the minimum site requirement to qualify for a multi-site?

There is a minimum 20 sites required for all multisite groups. The SQF Codes, Appendix 4, reflects all the details and requirements for multisite under SQF.

General Questions – System Elements

44. Is environmental monitoring required for all sites? If we meet our regulatory requirements for *Salmonella enteritidis* would that comply with the SQF requirement?

Environmental monitoring is now located in the system elements under 2.4.8 and is required for all food manufacturing and the manufacturing of food packaging. The requirement is not mandatory and each site is required to determine the environmental monitoring plan that fits within the risk of their process.

- For those sites that are suspended, the certification body shall conduct an unannounced site visit within 6 months from the date that the site was suspended (Reference: SQF Code, edition 8, Part A, Section 4.8).

Food Fraud

45. Is food fraud only for food safety related issues?

Food fraud is covered in both the Food Safety and Quality Codes. In the SQF Food Safety Codes it covers only food fraud that may impact food safety. The SQF Quality Code includes all food fraud issues.

46. Is Food Fraud applicable to Storage & Distribution Centers that do not own the product?

All storage and distribution centers are required to conduct a vulnerability assessment of their site to identify any potential food fraud threats. Any identified threats shall have a mitigation plan in place (Reference: SQF Code, edition 8, System Element: 2.7.2).

Allergens and Gluten

47. Do we need to label Gluten as an allergen?

You will need to check the food regulations in the country of sale. Gluten is considered in most jurisdictions to be a cause of 'food intolerance' rather than 'food allergy'. So under some regulations, 'wheat' is included in allergen labelling requirements, although other sources of gluten (eg barley, rye" may not be. The SQF Code, edition 8 requires that gluten is included in the allergen management program, and is labelled "where applicable", ie where required by regulations.

48. I have considered wheat and gluten to be the same...are they going to be considered 2 different allergens now?

No, include wheat and other sources of gluten if applicable (eg barley, rye, oats (if milled in the same facility as wheat)

49. I'm a pet food manufacturer and traditionally we have not been held to allergen criteria as the FDA doesn't recognize them. I see that allergen criteria is still in the code for pet food. During my next audit will I have to now have an allergen program?

2.8.2 requires that an allergen risk analysis be undertaken. The extent of any allergen program implemented will be dependent on that risk analysis.

50. Is there any information I can find regarding allergens for pet food manufacturers?

One point of contact for animal food and pet food would be the Animal Feed Industry Association or AFIA. Their website is <http://www.afia.org>. AFIA is the world's largest organization devoted exclusively to representing the business, legislative and regulatory interests of the U.S. animal feed industry and its suppliers.

51. Why is allergen management required for pet food and not for animal feed?

Pet food is considered higher risk than animal feed because it is taken into the home, and may accidentally or intentionally come into contact with allergic consumers. Animal feed is considered lower risk but still requires an allergen management program if required by customers or regulations.

52. MRL was referenced in primary production under 2.3.1. What is an MRL?

MRLs are 'maximum residue levels', and are explained in Appendix 2: Glossary.

53. Can you please provide further guidance for the monthly meetings with the SQF Practitioner and the Senior Site Management? Can the SQF Practitioner meet with their Director, that meets with the Senior Site Manager?

2.1.3.2 states “The SQF practitioner (s) shall update senior site management on a (minimum) monthly basis on matters impacting the implementation and maintenance of the SQF System”. The format of the update is entirely up to the arrangements within each site. The intent of this mandatory element is to ensure that senior site management are not only committed to the SQF program, but are knowledgeable and involved in the implementation and improvement of the SQF program.

54. Would publication of the weekly SQF meeting minutes meet the requirements for the monthly meetings between the SQF Practitioner and the Senior Site Management?

2.1.3.2 states “The SQF practitioner (s) shall update senior site management on a (minimum) monthly basis on matters impacting the implementation and maintenance of the SQF System”. The format of the update is entirely up to the arrangements within each site. The intent of this mandatory element is to ensure that senior site management are not only committed to the SQF program, but are knowledgeable and involved in the implementation and improvement of the SQF program.

General Questions- PRPs

55. Will there be any reference to standards regarding testing for air filtration systems?

This will depend on the needs and use of compressed air that contacts food or food contact surfaces, and on local regulations. SQF will not prescribe testing standards.

56. Can a site have unescorted visitors?

The requirements of 11.3.5.5 (and corresponding GMP modules) is that visitors are trained in food safety and hygiene procedures OR are escorted at all times. However from a food safety, food defence and personnel safety perspective, it is not advisable to allow unescorted visitors.

57. Will egg packing houses be required to use hair nets?

11.3.3.1 requires a risk analysis to determine whether or not hair restraint is required. The SQF Code does not mandate hair nets.

58. Are we required to stop using propane powered forklifts and switch to electric?

The SQF Code simply requires that any “gasses used in the manufacturing process that come into contact with food or food contact surfaces are maintained and regularly monitored for quality and applicable food safety hazards.”

59. Are there any software applications for record keeping and documentation of the system elements that really stand out above others for the SQF program?

The SQF Code does not endorse or support any particular software applications. There are many different software applications available and the choice is entirely up to the needs of the site.

60. Under section 11.2.9.1 does any new equipment purchased need to be evaluated by sanitation before the machine is purchased?

11.2.9.1 only requires that specifications for equipment, and purchasing procedures, are documented and implemented. This does not have to be specifically carried out by the sanitation Department or SQF Practitioner.

61. During the town hall meeting during last year’s conference, it was mentioned that a specific lux would be required for all lighting. Has that been incorporated in edition 8...

This was considered but was removed following public comments due to difficulties in measuring and enforcing lux requirements.

Training

62. I'm currently an SQF food safety practitioner; will I need to retake the training or exam for the SQF Food Safety Code, edition 8?

The education and knowledge requirements of an SQF practitioner are outlined in SQF Food Safety Code, edition 8 in element 2.1.2.5. They are as follows:

The SQF practitioner shall:

- i. Be employed by the supplier as a company employee on a full-time basis;
- ii. Hold a position of responsibility in relation to the management of the supplier's SQF System;
- iii. Have completed a HACCP training course;
- iv. Be competent to implement and maintain HACCP based food safety plans; and
- v. Have an understanding of the SQF Code their level of certification and the requirements to implement and maintain SQF System relevant to the supplier scope of certification.

As noted, there are no specific requirements for training (other than HACCP, which is further defined in the Code in Appendix 1: Glossary) or testing. The practitioner must demonstrate knowledge of the current version of the SQF Food Safety Code. Some choose to do this by successfully completing an Implementing SQF Systems training course. Additionally, the practitioner may adequately demonstrate knowledge of the Code by having an effectively-implemented SQF food safety System or appropriately address questions posed by the auditor at the time of the certification audit.

Additionally, note that there is no requirement to register or "certify" as a practitioner. A person in the role of a practitioner must meet the requirements of 2.1.2.4 and 2.1.2.5 of the SQF Code. Therefore there is no need to "re-register" or "re-certify," nor is there a need to retake either the Implementing SQF Systems course or the Implementing SQF System examination if already successfully completed to a previous edition.

Please note however, point 5 in element 2.1.2.5. The food safety practitioner is required to have an understanding of the SQF Code [edition 8] their level of certification and the requirements to implement and maintain SQF System relevant to the supplier scope of certification, so the practitioner may feel they will need to take further training on edition 8, however it is not required, per the SQF Food Safety Code.

63. Where can I get training on the SQF Food Safety Code?

The 2-day, instructor-led Implementing SQF Systems course is a critical first step in understanding the SQF Food Safety Code, edition 8 and the SQFI certification processes.

Growers, processors, distributors and food packaging manufacturers often already have in place many of the food safety and quality programs found in the SQF Code, but additional steps must be taken to identify any gaps to fully protect their product. This comprehensive course points those who are new to the SQF Food Safety Code in the right direction. A certificate of attendance is issued upon successful completion of the course.

For the best learning experience and to fully benefit from this course it is strongly recommended that participants successfully complete an examinable HACCP training course prior to registering for this course.

All licensed SQF training centers offer the Implementing SQF Systems course. Visit the Training Centers tab on the SQFI website (SQFI.com) for a list of training centers.

Coming Soon! - Implementing SQF Systems Training, edition 8 Online Training

Same content as the instructor-led course, but in an easy-to-access online format. A certificate of attendance is issued upon successful completion of the course. Stay tuned for availability dates.

64. What will I need to do to qualify as an SQF quality practitioner?

The education and knowledge requirements of an SQF practitioner are outlined in SQF Quality Code, edition 8 in element 2.1.2.5. They are as follows:

In addition to the SQF Food Safety Code requirements, the SQF quality practitioner shall:

- i. Be competent to implement and maintain HACCP-based food quality plans;
- ii. Understand the SQF Quality Code and the requirements to implement and maintain a quality management system; and
- iii. Be competent in statistical process control (SPC) and/or other quality tools to reduce process variation and drive root cause analysis of non-conformities.

Note: there are no specific requirements for training or testing. The practitioner must demonstrate knowledge of the current version of the SQF Quality Code. Some may choose to do this by successfully completing the SQF Quality Systems for Manufacturing course. Additionally, the practitioner may adequately demonstrate knowledge of the Code by having an effectively-implemented SQF quality management System or appropriately address questions posed by the auditor at the time of the certification audit.

Additionally, note that there is no requirement to register or “certify” as a practitioner. A person in the role of a practitioner must meet the requirements of 2.1.2.4 and 2.1.2.5 of the SQF Code. Therefore there is no need to “re-register” or “re-certify” as a quality practitioner, if the individual already successfully meets the requirements of 2.1.2.4 and 2.1.2.5.

65. Is there training available for the SQF quality practitioner?

Yes. The 2-day, instructor-led SQF Quality Systems for Manufacturing training course is intended for quality, technical and managerial staff working in food manufacturing who seeks to understand and differentiate between food safety management and quality management, and who are intending to implement the SQF Quality Code or update their current quality System to edition 8. A certificate of attendance is issued upon successful completion of the course.

Learning outcomes include:

- Understand how quality management principles impact on product quality and productivity;
- Apply the HACCP method to monitor and control quality parameters;
- An understanding of the link between product quality and quality management principles;
- Understand and apply the ‘cost of quality’ model within a facility.

Course attendees must have successfully completed examinable HACCP training, and either Implementing SQF Systems training (minimum: edition 7), or Auditing SQF Systems/Lead SQF Auditor training (minimum: edition 7).

Many licensed SQF training centers offer the SQF Quality Systems for Manufacturing course. Visit the Training Centers tab on the SQFI website (SQFI.com) for a list of approved training centers.

Coming Soon! - SQF Quality Systems for Manufacturing Online Training

Same content as the instructor-led course, but in an easy-to-access online format. A certificate of attendance is issued upon successful completion of the course. Stay tuned for availability dates.

66. Will SQF offer training to the new SQF Food Safety Code for Retail?

Yes. The Implementing the SQF Retail Code training is a one-day training covering the following topics:

- Certification process
- Code Review
- Food Safety Management System
- Hazard & Risk Management System
- Good Retail Practices
- Auditor Qualifications
- Audit Process
- Corporate
- Franchise
- Store/Site

The SQF Retail Grocery GFSI Certification is an industry driven initiative of continuous improvement in food safety management systems to ensure confidence in the delivery of safe food to consumers worldwide. It provides a "Gold Standard" for retailers as a foundation to further food safety initiatives.

Many licensed SQF training centers offer the SQF Food Safety Code for Retail course. Visit the Training Centers tab on the SQFI website (SQFI.com) for a list of approved training centers.

67. Where can I get training on food fraud, internal auditing and other topics?

SQF licensed training centers offer expert training on many topics related to those addressed in the SQF Code including food fraud, internal auditing, and quality systems. Licensed SQF training centers are upstanding organizations with solid, ethical business practices; have each functioned in the training space for many years; have businesses dedicated to training and educating those in the food industry; and are use only trainers who have extensive industry and training experience. To locate a licensed SQF training center, visit the Training Centers tab on the SQFI website (sqfi.com).

68. Will registered SQF auditors need to requalify to conduct SQF Food Safety Code, edition 8 audits?

No, however, as part of the auditor's annual registration, the auditor is required to complete a four-hour SQF Professional Update. This year's update provides an overview of the SQF Code, edition 8.