

Contract Manufacturers

Definition

A contract manufacturer contributes products or in-process materials to the site under certification and are included in the scope of certification.

Applicable Code Requirements

1. 2.3.3.1
2. 2.3.3.2
3. 2.3.3.3
4. 2.3.3.4

Review Glossary Terms

1. Contract Manufacturer (co-man, co-manufacturer)

Implementation & Audit Guidance

What does it mean?

Facilities (sites) that are contracted by the SQF certified site to produce, process, pack and /or store part of or all of one or more products included in the site's SQF scope of certification are defined as a contract manufacturer. In some cases, a product may be manufactured interchangeably at the certified site and by the contract manufacturer. In other cases, a contract manufacturer may only be used intermittently to fulfill or supplement the certified site's production. Contract manufacturers must follow the requirements outlined in the SQF Food Safety Code.

Why is it in the Code & why is it important?

The SQF code requirements for Contract Manufacturers ensure that food safety hazards are being managed by both the contractor and the certified site in a manner that aligns with the SQF code. This level of oversight provides further assurance to customers and stakeholders that products listed in the scope of certification are being managed to ensure food safety hazards are controlled. The relationship between the site and contract manufacturer is different than that of a supplier in that they are seen to be an integral part of the manufacturing process. Where they control the entire manufacturing process they are seen by customers and stakeholders as requiring the same level of oversight. The contract manufacturing must be assessed for risk to determine if their process or part of their process is high or low risk. This will determine how they are managed. High risk sites must achieve SQF certification and low risk sites must show compliance to SQF or another GFSI recognized program particular food sector category. The code also emphasizes the requirement to have contracts with distribution centers that may handle product manufactured at the site or contract manufacturer sites. The contract must ensure the distribution center's adhere to any customer requirements plus also ensure those centers are certified or audited as defined above or as stated in 2.3.3.2 of the code.

All the requirements in the code for contract manufacturers and distribution centers combine to ensure these important partners are managing food safety systems similar to the certified site.

RIO Road to Audits (Records, Interviews, and Observations)

Records	Interviews	Observations
<p>The following are examples of records and or documents to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ Audit reports ▪ Risk assessments ▪ Contracts ▪ Invoices or Sales Receipts 	<p>The following are examples of people to interview to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ SQF Practitioner ▪ Finance/ legal ▪ Corporate personnel <p>The following are examples of questions to ask to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ How were contract manufacturers assessed for risk? ▪ What process is followed to ensure contracts and specifications are up to date? ▪ How are customers aware that some products supplied are being manufactured by contracted sites? ▪ What process is followed to ensure contract sites are compliant with the SQF code? 	<p>The following are examples of observations to assist in the implementation and review of this topic:</p> <ul style="list-style-type: none"> ▪ Inventoried product. ▪ Receipt and/or use of contract products. ▪ Product shipping (location, descriptions).

Additional References

- FDA Archived Documents Supply-Chain Program Requirements and Co-Manufacturer Supplier Approval and Verification for Human Food and Animal Food
<https://www.federalregister.gov/documents/2017/11/06/2017-24098/supply-chain-program-requirements-and-co-manufacturer-supplier-approval-and-verification-for-human>