



General Guidance for Developing, Documenting, Implementing, Maintaining, and Auditing an SQF System

Module 15: Good Retail Practices for Retail

SQF Code, Edition 8.1

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Guidance for Developing, Documenting, Implementing,
Maintaining and Auditing an SQF System for Retail
SQF Code, Edition 8.1 –SQF System Elements for Retail

Preface

This document provides general guidance for SQF suppliers, consultants and auditors when implementing and auditing module 2 of the SQF Food Safety Code for Retail, edition 8.1 and can be used where no specific industry sector guidance is available.

The purpose of SQF Code implementation is not only to achieve certification, but to assure constant and continual validate and review of a supplier’s SQF System for currency and completeness.

Effective implementation of the SQF Code requires the commitment of the site management and the constant involvement and participation of site staff to maintain the safety and quality of SQF certified products. The results of effective SQF implementation are not only the protection of public health and company brands, but real improvement in margins by reduction of waste, recalls and withdrawals, and improved productivity through “doing it right the first time.”

The SQF Institute is grateful to the SQF Institute’s Technical Advisory Council and SQF stakeholders for their assistance in reviewing and contributing to this document.

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Section 1. Introduction

1.1 Purpose of the Guidance Documents

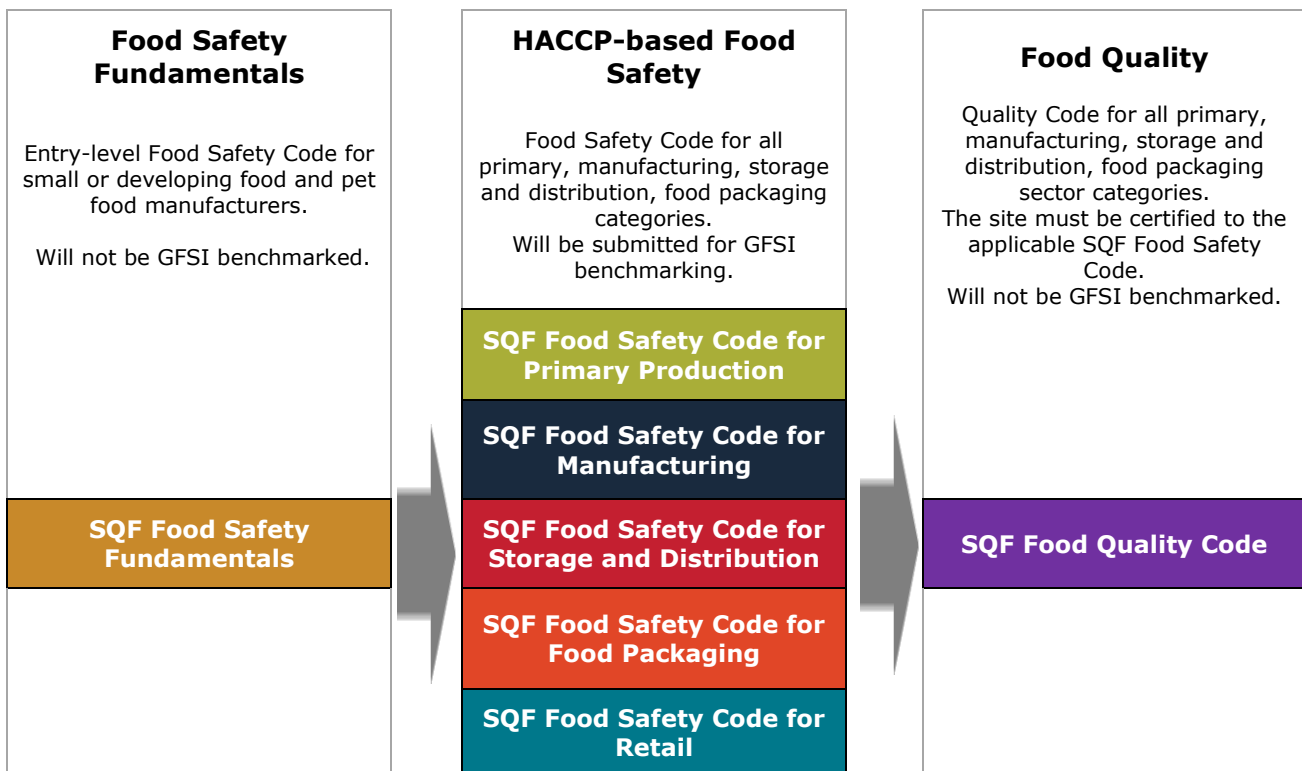
The purpose of this series of SQF Guidance Documents is to assist suppliers with designing, developing, documenting, implementing and maintaining an SQF System using the SQF Code, edition 8, and to assist SQF registered auditors in auditing the SQF Code, edition 8.1.

The relevant Code version number is identified in the document header. Terms used in these documents are defined in Appendix 2: Glossary of the SQF Code edition 8.1.

Guidance is intended to support the SQF Code, but does not replace it. It is not an auditable document, nor is it definitive and applicable in every situation. Suppliers, consultants, and auditors are required to understand the food safety (and quality, where applicable) risks in a given industry sector and are able to apply the SQF Code to effectively control those risks.

1.2 Layout of the SQF Code

The new SQF Edition 8 Codes have been updated and constructed in a new format. SQF Food Safety Fundamentals (the old Level 1 under Edition 7.2) is a separate code. The old Level 2 code was divided into five different codes: SQF Food Safety Code for Primary Production (farm or ranch where crops and animals and fish are raised); SQF Food Safety Code for Manufacturing (covering all types of food manufacturing); SQF Food Safety Code for Storage and Distribution; SQF Food Safety Code for Food Packaging; and SQF Food Safety Code for Retail. The old Level 3 has been separated out to a SQF Food Quality Code for all companies desiring to be certified to the SQF Quality Code.



The SQF Food Safety Code for Retail, edition 8.1 consists of two parts and four appendices. Part A contains the criteria for implementing and maintaining the SQF Code. Part B, the heart of the SQF Code, is made up of modules 2 and 15 for Retail. Within each module are clauses or elements, which

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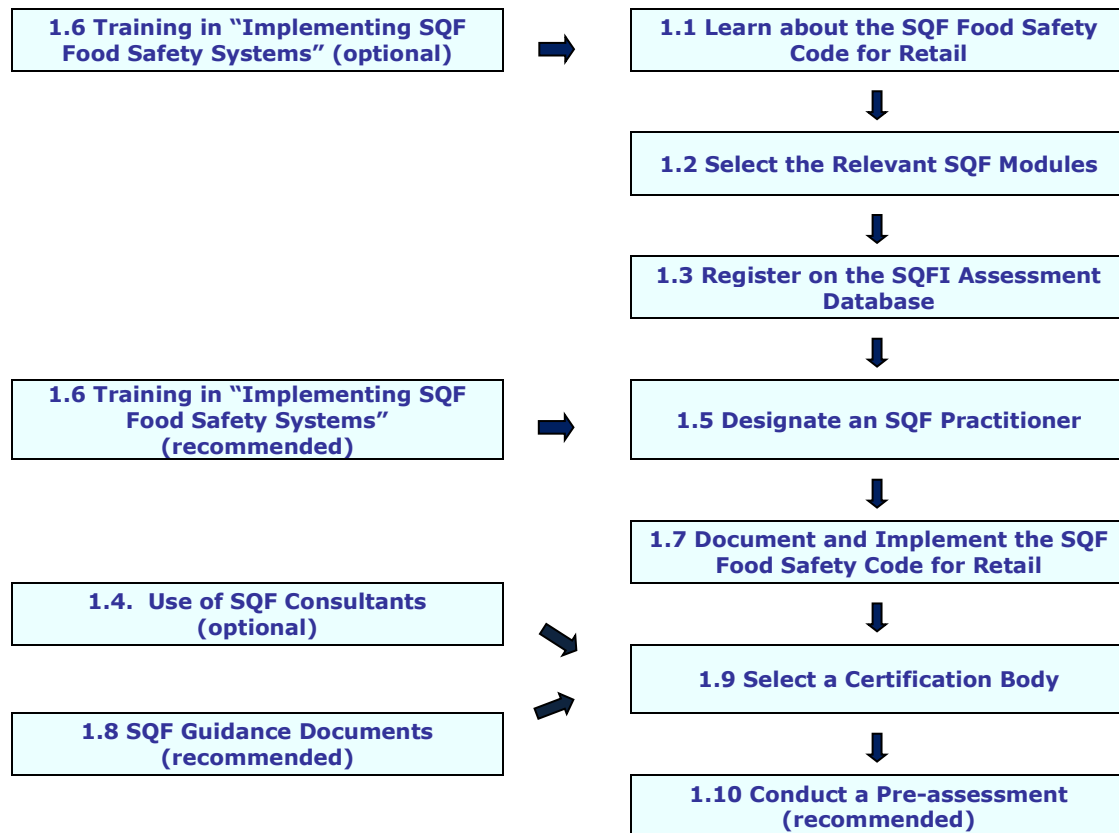
the supplier must implement as their SQF System. In module 2, the clauses encompass the system elements. Each element outlines where procedures needed to be documented, where record keeping is required or where actions must be taken. Module 15 is the Good Retail Practices requirements applicable to the Retail food industry sector. Retailers must meet the requirements of these modules. Appendix 4 describes the requirements of the SQF multi-site program for Retail sites managed by a central site.

The four appendices in the SQF Code provide additional information needed to implement an SQF System:

- Appendix 1: SQF Food Sector Categories
- Appendix 2: Glossary of Terms
- Appendix 3: SQF Quality Shield and Logo Rules of Use
- Appendix 4: Requirements for SQF Retail Multi-Store Certification

Section 2. The SQF Certification Process

The steps for the process of preparing for SQF certification are shown below. Optional steps or other options are indicated in parenthesis. This process is outlined in section 1 of Part A of the SQF Code, edition 8.



Step 1 Learn about the SQF Food Safety Code for Retail

There are several ways to learn how to implement the SQF Food Safety Code for Retail within your food business. The following options are available:

- Attend an "Implementing SQF Systems" training course (refer to 1.6) through a licensed SQF Training Center (recommended);
- Take the online "Implementing SQF Systems" training course available from the SQFI website (sqfi.com);
- Train yourself by downloading the SQF Food Safety Code for Retail from the SQFI website (sqfi.com) free of charge, and read how to apply it to your organization.

Step 2 Select the Relevant SQF Modules

- The following modules apply to the food retail industry sector.
- Module 2 is applicable to all companies wanting to be certified to the SQF Codes and must be implemented by all retailers.
- This document contains the certification program owner management requirements (Part A), the system elements (module 2), and Good Retail Practices (GRP) modules (module 15) for food retail.
- All retailers are required to implement the retail system elements plus the applicable Good Retail

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 Practices (GRP) module:

SQF Food Safety Code for Retail		
Fsc	Category	Applicable GRP Modules
24	Food Retailing	Module 15: GRP for retail

Step 3 Register on the SQF Database

- To be considered for SQF certification, organizations are required to register in the SQF assessment database. The database can be accessed from the SQFI website (sqfi.com).
- Registration is annual, and there is a fee per organization payable at registration and renewal. The fee scale is dependent on the size of the organization and number of stores as determined by gross annual sales revenue. The fee scale is available on the SQFI website (sqfi.com).
- Organizations must register with SQFI prior to achieving certification and must remain registered at all times to retain their certification. If the organization fails to maintain registration, the certificate will be invalid until the organization is properly registered in the assessment database.
-

Step 4 Designate an SQF Practitioner

- Whether or not an SQF consultant is used, the SQF Food Safety Code for Retail requires that every organization have a suitably qualified SQF practitioner to oversee the development, implementation, review and maintenance of the SQF food safety System, including the Good Retail Practices (GRPs) and food safety plans. The requirements for an SQF practitioner are described in 2.1.6.2 and 2.1.6.3 of the SQF Food Safety Code for Retail. Some companies may choose to have more than one SQF practitioner to meet operational requirements.
-

Step 5 Document and Implement the SQF Food Safety Code for Retail

- To achieve SQF certification, the organization must document and implement the relevant system elements (module 2) and module 15 (GRPs) of the SQF Food Safety Code for Retail.
- This requires a two-stage process:
- Document the SQF food safety System – Prepare policies, procedures, work instructions and specifications that meet the relevant modules (2 and 15) of the SQF Food Safety Code for Retail. In other words, “say what you do.”
- Implement the SQF food safety System – Implement the prepared policies, procedures, work instructions and specifications, and keep records to demonstrate compliance to the relevant modules of the SQF Food Safety Code for Retail. In other words, “do what you say” and “prove it.” It is important that site leadership ensure that workers are competent in doing their jobs related to requirements in the SQF Food Safety Code for Retail. It is essential that a site be able to “prove” that they are consistently following those requirements and have documented that they have completed the requirements in the code. SQFI recommends that a minimum of two (2) months of records be available before a company office and store audit is conducted.
-

Step 6 Select a Certification Body

Certification bodies are licensed by SQFI to conduct SQF audits and issue the SQF certificate. SQFI licensed certification bodies are required to be accredited to the international standard ISO/IEC 17065:2012 (or subsequent versions as applicable) and be subject to annual assessments of their certification activities by SQFI licensed accreditation bodies.

The site is required to have an agreement with a certification body in place at all times which outlines the SQF audit and certification services provided. These include as a minimum:

- i. The scope of certification (refer Part A, 2.2)
- ii. The expected time to conduct and finalize the audit and the reporting requirements;

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- iii. The certification body's fee structure;
- iv. The conditions under which the SQF certificate is issued, withdrawn or suspended; and
- v. The certification body's appeals, complaints and disputes procedure.

A current list of licensed certification bodies is available on the SQFI website (sqfi.com). Certification bodies are also listed in the SQFI assessment database and organizations can request a quote or select a certification body online once they have registered.

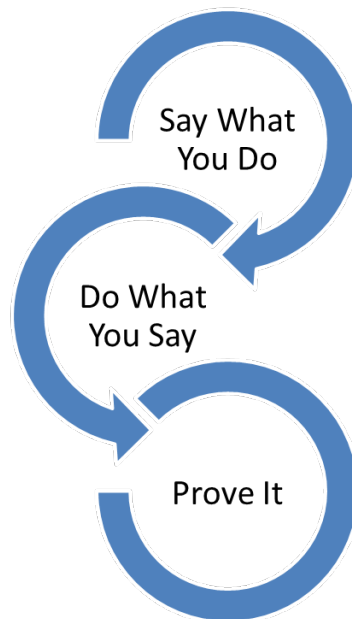
Organizations seeking to implement an SQF Multi-Store sampling program (refer to Appendix 4 of the SQF Food Safety Code for Retail) must indicate this in their application to the certification body. The agreed Multi-Store sampling program, including the identification of the central site (s) and number and names of the sub-sites (stores), must be included in the agreement with the certification body.

Step 7 Conduct a Pre-assessment Audit

A pre-assessment audit is not mandatory, but is recommended to provide a "health check" of the organization's implemented SQF Retail System. A pre-assessment audit can assist in identifying gaps in the organization's SQF System so that corrective action can occur before engaging the selected certification body for a full certification audit. It can be conducted using internal resources, SQF consultant, or SQF food safety auditor (note: the actual food safety auditor that will perform the full certification audit cannot assist with the preparation for the audit, they can only perform the GAP assessment and provide a report of the findings).

Section 3. The SQF Implementation Process

To achieve SQF certification, the retailer must document and implement the relevant modules of the SQF Food Safety Code for Retail. It's also important to provide evidence of the System in the form of documents and records. The implementation process is shown below.



Document the SQF System – prepare policies, procedures, work instructions and specifications that address the relevant modules of the SQF Code. In other words "say what you do."

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Implement the SQF System – put into place the prepared policies, procedures, work instructions and specifications. In other words, “do what you say.”

Provide records the SQF System – keep records to demonstrate compliance to the relevant modules of the SQF Code. These records provide evidence of the function and control of the System. In other words, “prove it.”

Section 4. Introduction to this Guide

1. Purpose and Scope of this Guide

The purpose of this series of SQF Guidance Documents is to assist suppliers with designing, developing, documenting, implementing and maintaining an SQF System using the SQF Food Safety Code for Retail, edition 8, and to assist SQF registered auditors in auditing the SQF Food Safety Code for Retail, edition 8.

The relevant Code version number is identified in the document header. Terms used in this document are defined in Appendix 2: Glossary of the SQF Food Safety Code for Retail, edition 8.

This particular guide covers the requirements of *Module 2: SQF System Elements for the Retail Code*. All retailers seeking certification to the SQF Food Safety Code for Retail, edition 8 must document, implement and maintain module 2 and module 15.

Guidance is intended to support the SQF Food Safety Code for Retail, edition 8, but does not replace it. It is not an auditable document, nor is it definitive and applicable in every situation. Retailers, consultants, and auditors are required to understand the food safety risks in the retail industry sector and are able to apply the SQF Food Safety Code for Retail, edition 8 to effectively control those risks.

Module 2 is applied for Food Safety Plans.

SQF – Food Safety Plan

This module incorporates all requirements from the SQF Food Safety Fundamentals – Entry Level Food Safety Code, but also requires the Retailer to first, identify hazards that can impact product safety; second, conduct a food safety hazard analysis of the product (s) and its process(es); and third, identify actions to eliminate, prevent or reduce identified hazards to an acceptable level. These steps must be achieved using an approved HACCP methodology (refer to section 2, below). The SQF Food Safety Code for Retail, edition 8 requirements are found in module 2 and module 15.

The HACCP methodology must be used to identify and control quality to achieve Food Quality Code certification.

This guide focuses on the requirements for only food safety implementation of the SQF Food Safety Code for Retail, edition 8. All requirements for meeting the quality food code can be found in the SQF Food Quality Code, edition 8.

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2. The Structure of the SQF Code, edition 8

The SQF Code is a process and product certification standard that uses Hazard Analysis Critical Control Points (HACCP) as its foundation. HACCP is a food safety management system based on the principles defined in either:

- The CODEX Alimentarius Commission HACCP principles and guidelines, or
- The National Advisory Committee on Microbiological Criteria for Food (NACMCF)

The main feature of the SQF Code is its emphasis on the systematic application of HACCP to identify, monitor and control food safety hazards as well as food quality hazards in the process flow to manage identified food safety risks and/or quality threats.

This guide references the HACCP (Hazard Analysis and Critical Control Point) technique but does not explain the HACCP method in any detail. It requires that those implementing and auditing an SQF System to have completed HACCP training as defined in *Appendix 2: Glossary* of the SQF Food Safety Code for Retail, edition 8 and have extensive knowledge of the HACCP guidelines of either of the above documents, the application of the HACCP principles and experience in implementing HACCP systems. It is not meant to deliver prescribed, absolute rules for implementation, but to be utilized by retailers, SQF consultants and SQF auditors as recommendations on practical applications for implementation and certification of the SQF Code.

3. The Structure of an SQF System

An SQF System is a risk management system documented and implemented by a retailer of food (or related) products to control food safety risks using the SQF Food Safety Code for Retail, edition 8. It can be audited and certified by an SQF licensed certification body.

The process of how to document and implement the SQF Food Safety Code for Retail, edition 8 and achieve SQF certification can be found in the most current version of Part A of the SQF Food Safety Code for Retail, edition 8.1.

Module 2 defines the core elements of the SQF Food Safety Code for Retail that provide protection and assurance and are required to be implemented by all retailers seeking SQF certification. It forms the foundation of the retailer's SQF System. It includes the commitment of site management to maintain a safe, quality (when certified to the SQF Food Quality Code) food supply and the management processes that must be in place to do so; the HACCP plan(s) that identify and control food safety hazards; product traceability and recall; and staff training requirements.

It also points to the industry specific pre-requisite programs that are found in module 15 of the SQF Food Safety Code for Retail. Module 2 must be paired with implementation of the relevant Good Retail Practices (GRP) module 15 for SQF Certification to occur.

The elements of Module 2 that the supplier must address in their SQF System are as follows:

- 2.1 Management Commitment
- 2.2 Document Control and Records
- 2.3 Specification and Products
- 2.4 Attaining Food Safety (and Food Quality at level 3)
- 2.5 SQF System Verification
- 2.6 Product Identification, Trace, Serious Incident Management
- 2.7 Food Defense
- 2.8 Training

4. Module 2 System Elements

The SQF Food Safety Code for Retail, edition 8.1 recognizes that every business is different and that some SQF System Elements may not apply to some food businesses. However, it is expected that the majority of the elements of module 2 apply to the majority of food businesses, and where they are applicable, must be documented and implemented.

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A number of the elements in module 2 are indicated as “mandatory” and must be implemented and audited for certification to be granted. During an SQF audit, these elements cannot be reported as “not applicable” or “exempt” by the auditor. They are marked with an (M) in the heading of the clause. The mandatory elements are listed in Part A, 2.9 of the SQF Code, edition 8.1 and are as follows:

- 2.1.1 Food Safety Management General Requirements
- 2.1.2 Food Safety Policy
- 2.1.3 Food Safety Management System
- 2.1.4 Management Responsibility
- 2.1.5. Management Review
- 2.1.6. Resource Management
- 2.2.1 Document Control
- 2.2.2 Records
- 2.4.1 Food Safety Plan
- 2.4.3. Hazard and Risk Management System
- 2.5.1 Internal Audit
- 2.5.2 Corrective Action
- 2.5.3 Control of Measuring and Monitoring Devices
- 2.6.1 Product Information
- 2.6.2 Product Trace
- 2.6.3.2. Product Withdrawal and Recall
- 2.7.1 Food Defense Plan
- 2.8.2 Training Program

Retailers should not consider the mandatory elements as the only elements to be implemented. All applicable elements within module 2 must be implemented and will be audited. For example, Serious Incident Management and Crisis Communication Plan is not considered to be a mandatory element because some facilities might only have a very basic plan in place and might have difficulty in handling all of the potential crises that might occur. However, every facility must have a basic plan of what to do when a crisis occurs to ensure that affected product is not sold to the public potentially causing a food safety risk. The section 2.6.3 will be audited to ensure the site has met the requirements. Even though there is a non-conformance to this area, the site may still get certified to the code as long as they meet the score requirements listed later in this document.

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5. Format of the Module 2 Guidance

The following section explains the elements and sub-elements of the SQF Food Safety Code for Retail, edition 8 and provides guidance on what a retailer needs to do to develop, document and implement an SQF System, and provides information on what the auditor may be looking for to confirm compliance.

The following format is used throughout:

Element Number and Name

Sub-element Number and Name. Mandatory elements will be indicated by: "(Mandatory)".

This section will describe what the SQF Food Safety Code for Retail, edition 8.1 requires. This is the text from the SQF Food Safety Code for Retail, edition 8 and is the auditable standard. **Where there is disagreement between the text of the SQF Code and the guidance, the SQF Code in English prevails.**

Implementation Guidance
<p>What does it mean?</p> <p>This will include the interpretative comments of what the sub-element requires or definitions of the terms used.</p> <p>What do I have to do?</p> <p>This will include suggestions of what is required to be done by the retailer to document and implement this sub-element. The information provided is not considered exhaustive and may not apply in every situation. It is meant to provide guidance and interpretation.</p>
Auditing Guidance
<p>This will include suggestions of what the auditor may seek as evidence of compliance for this sub-element. The information provided is not exhaustive and may not apply in every situation.</p>

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Module 2: SQF Systems Elements

2.1 Management Commitment

The high level of commitment, support, and leadership must be demonstrated by senior company and site management and it is fundamental to the effective implementation of an SQF food safety management system. Senior management must create the environment within the facility that encourages a pro-active attitude amongst staff towards food safety. They must create a food safety based working culture throughout the organization.

2.1.1 Food Safety Management General Requirements (Mandatory)

What the SQF Code says

2.1.1.1 The organization shall provide evidence of its commitment to document, implement and maintain an effective SQF System and to support its ongoing improvement. The system shall:

- i. Identify the processes needed for the food safety management system;
- ii. Determine the sequence and interaction of these processes;
- iii. Determine the criteria and methods required to ensure that effective implementation, operation and control of these processes;
- iv. Ensure the availability of information necessary to support the operation and monitoring of these processes;
- v. Measure, monitor and analyze these processes and implement actions necessary to achieve planned results and continuous improvement.

2.1.1 Implementation Guidance

What does it mean?

In order to meet the criteria for SQF Certification, it is essential for the leadership team to ensure there is an effective Food Safety System and Food Safety working culture established and implemented throughout the facility.

What do I have to do?

To achieve this effective system, the organization must first identify the processes and products that require a food safety system developed and implemented. Then the team decides on what the implementation sequence must be to effectively make it work at the site. This will include creating a Hazard Analysis and Critical Control Points (HACCP) based system (refer to 2.4.1.) and all of the supporting programs (sanitation, personal hygiene, preventive maintenance, pest control, etc.) to help control all of the identified hazards throughout the processes used in the organization. The leadership team shall then ensure that there are properly written procedures and work instructions for implementation of this food safety system. A training system to include ensuring competency of the worker before they perform those food safety related tasks must be established and carried out. The leadership team shall ensure that the information necessary operate the SQF system and food safety system in the organization is made available to all staff who need that information. The entire SQF Food Safety system shall be measured (such as with objectives and Key Performance Indicators), monitored and analysed to not only achieve the goals and objectives, but to ensure there is a continuous improvement system put in place.

2.1.1 Auditing Guidance

The Commitment might be the first item in the SQF Food Safety Code for Retail, but it will be reviewed by the auditor initially at the end of the desk audit to ensure there are all of the needed portions in the policies and procedures to effectively design and implement a SQF Food Safety System and Food Safety working culture. During the first and subsequent facility audits, the auditor will also perform the entire facility audit looking for evidence that the leadership team is truly committed to establishing and implementing an effective SQF Food Safety System and Food Safety working culture and that the written procedures are applied in practice on a daily basis.

The auditor will seek evidence of compliance to management commitment and thereby a “culture of food safety” through observation, record reviews and interview. Evidence may include:

- A food safety policy statement that commits to meeting regulatory and customer requirements and indicates how those requirements shall be met that has been effectively communicated to all staff. The staff shows evidence that they fully understand the organization’s objectives, goals and leadership team expectations for the SQF food safety system.

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- Workers following the written procedures and work instructions for food safety which is creating a food safety working culture (where staff members know the food safety hazards around them and they fully understand how to keep the hazards out of the products and processes they work with on a daily basis.
- Staff members accurately complete all required SQF Food Safety system forms and have them reviewed in a timely manner.
- The organization overall meets the desired outcomes, objectives and goals set by the leadership team and achieves and maintains SQF certification to the SQF Food Safety Code for Retail

2.1.2 Food Safety Policy (Mandatory)

What the SQF Code says

- 2.1.2.1 Senior management shall prepare and implement a policy statement that outlines as a minimum the:
- i. Organization's commitment to supply safe food;
 - ii. Resources and methods used to comply with its customer and regulatory requirements and continually improve its food safety management system; and
 - iii. Organization's commitment to establish and review food safety objectives.
- 2.1.2.2 The policy statement shall be:
- i. Signed by senior management;
 - ii. Made available in language understood by all staff;
 - iii. Displayed in a prominent position and effectively communicated to all staff; and
 - iv. Reviewed annually for accuracy or when changes occur to operations or regulations

2.1.2 Implementation Guidance

What does it mean?

Commitment to a policy by senior management is a visible sign of leadership – the creation of a “culture of food safety” within the site. The policy statement provides a focus on what the site aspires to and is working to achieve in terms of food safety and quality.

“Senior” means the person who has operational control within the supplier's site. It is considered to be the senior person on site. Some larger sites may be influenced by a Board of Directors or senior management team based at Head Office. However as considered in the SQF Code, it is the site senior management that is referred to, and the person who must sign the policy.

Senior management must sign the document as an indication of their commitment to implement it. The policy statement sets out the objectives of the site's SQF System, and provides the framework for achieving objectives at an operational level. Objectives must be written in a way that every employee at the site can contribute toward achieving them.

Commitment to regulatory and customer requirements underpins the site's SQF System and must be included in the policy statement.

What do I have to do?

This element is mandatory. The policy statement is generally the first part of the supplier's food safety and quality manual (refer 2.1.3). The owner or most senior responsible person within the supplier site is required to:

- document and sign a policy statement that clearly demonstrates their understanding of their food safety and/or quality responsibility under the SQF System;
- outlines how the supplier will achieve and maintain food safety and quality;
- includes a stated commitment to comply with regulatory and customer requirements; and
- includes a stated commitment to continually improve the SQF System.

The policy statement must be reviewed at least annually by senior management. This review is normally done when the review of the SQF System is undertaken.

The policy statement must be available to all staff in a form and language that is understood by all staff.

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2.1.2 Auditing Guidance

The content of the policy statement will be reviewed by the auditor initially at the desk audit. However during the first and subsequent facility audits, the auditor will check to confirm that the contents of the policy statement are applied in practice on a daily basis.

The auditor will seek evidence of compliance to management commitment and thereby a “culture of food safety” through observation and interview. Evidence may include:

- A documented policy statement, signed by the senior site manager, that commits to meeting regulatory and customer requirements and indicates how those requirements shall be met; setting and achieving food safety and quality objectives; reviewing food safety and quality objectives on a regular (at least annual) basis; and continually improving their SQF food safety and quality management System.
- The currency of the policy statement.
- The availability of the policy statement to all staff within the facility. This includes confirming employee understanding of the policy statement.
- Food safety and quality objectives are established and realistic.
- Activities within the facility meet regulatory and customer expectations.
- Activities within the facility reflect established food safety and quality objectives. The auditor may seek company food safety meeting minutes and check if management participated in these meetings.
- The policy statement, including food safety and quality objectives, is reviewed at least annually.

The policy statement need not only be posted, however the actions for management commitment must be implemented.

There are also situations that may either singly or in combination indicate poor management commitment such as:

- A plant environment in which employees and management are not engaged or have no awareness of food safety objectives;
- Staffing positions that are recently created (indicating they were created simply to meet the element of the Code and not proactively to address food safety objectives), outdated or have been vacant for an extended period of time;
- Recent recalls or ongoing audit pressure;
- Plant is for sale or a public announcement has been made that the plant or division will be sold;
- The use of a large, temporary labor pool.

2.1.3 Food Safety Management System (Mandatory)

What the SQF Code says

2.1.3.1 A food safety manual shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the organization will use to meet the requirements of this Standard, be made available to staff and include:

- i. A summary of the organization’s food safety policies and the methods it will apply to meet the requirements of this standard;
- ii. The policy statement and organization chart;
- iii. Risk level of store(s);
- iv. A list of the nature of the products (pre-packaged foods only sold as ambient stable, refrigerated, frozen or combinations of these, bulk whole produce, home delivery of ambient stable food, display of unpackaged foods excluding bulk produce, on-site food preparation, restaurant with food preparation, cut produce, off-site food preparation, home delivery of refrigerated, frozen or hot food, etc.);
- v. A list of the in-store processes conducted (e.g. cook, chill, reheat, thaw, grind, wash, assemble, mix, cut, chop, “crisping”, smoking for preservation, canning, juicing, fermentation, Reduced Oxygen Packaging (ROP), growing of produce, live animal/seafood for slaughter, etc.); and

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- vi. A list of the departments covered and risk level under the scope of certification. (e.g. deli, bakery, butchery, seafood, confectionary, perishable prepackaged, shelf stable prepackaged, foodservice, catering, delivery, etc.).

2.1.3.2 A food safety manual shall be documented, maintained, made available to relevant staff and include or reference the written procedures, pre-requisite programs, preventive controls, food safety plans and other documentation necessary to support the development and the implementation, maintenance and control of the SQF System.

2.1.3 Implementation Guidance

What does it mean?

In general, food safety management systems involve “saying what you do,” e.g., documenting policies, specifications, procedures, HACCP plans and work instructions that agree with the standard (in this case, the SQF Food Safety Code for Retail, Edition 8), and “doing what you say,” e.g., operating based on those documented policies and procedures. This is reflected throughout the SQF Food Safety Code for Retail in the use of the terms “documented and implemented.”

In the SQF Food Safety Code for Retail the food safety manual is the documented system (“saying what you do”) that must be implemented (“doing what you say”).

The food safety manual must be practical, usable, and available to all employees with a responsibility for food safety. It can be stored electronically or in hard copy, and the currency and security of the manual must be controlled. The form and structure of the manual is determined entirely by the retailer. It must be in a language and a form that is understood by all relevant employees.

What do I have to do?

This element is mandatory. The retailer must prepare a food safety manual that documents the policies, procedures, pre-requisite programs, Food Safety Plan(s), specifications and work instructions necessary to support the development, implementation, maintenance and control of the SQF System.

The manual will include the company policy statement and an organizational chart. It will include the HACCP Food Safety Plan(s) for all products and processes included in the retailer’s scope of certification.

There is no prescribed format for how the food safety manual is to be constructed. Format is determined by the retailer. It can be divided into a policy manual, food safety manual, or combined into one manual. It can be integrated with other operational procedures, or housed in a separate SQF manual - the choice depends on what best suits the retailer’s business.

The main criteria are to ensure that the manual conforms to the requirements of the SQF Food Safety Code for Retail that are relevant for that industry sector and site, and that it is readily useable by the staff located at the site. It therefore is to be brief and concise and be available in a form and language that meets the access needs, language and literacy levels of the operating staff.

2.1.3 Auditing Guidance

The food safety manual shall be thoroughly audited as part of the initial desk audit. Any non-conformances raised at the desk audit must be corrected before proceeding with the initial facility audit. The content of the manual shall be reviewed and verified, but not the format.

Thereafter at subsequent recertification audits, the desk audit is blended with the facility audit. The auditor shall review changes and conduct checks of the documentation, including specifications or procedures that may impact on food safety. The content of Food Safety Plans shall be reviewed at every audit.

The auditor will seek evidence of compliance to this requirement by reviewing documentation. Evidence may include:

- The manual includes the company policy statement (refer 2.1.2) and organizational structure and job descriptions (refer 2.1.4)
- The manual includes a summary of the supplier’s food safety policies, and covers all relevant elements of the SQF Food Safety Code for Retail.
- The manual includes procedures and/or work instructions for all pre-requisite programs included within the retailer’s scope of certification.
- The manual includes specifications for all products included within the retailer’s scope of certification.
- The manual includes the HACCP Food Safety Plan(s) for all products included in the retailer’s scope of certification.
- The manual is current, concise, available, and usable by employees within the retailer’s facility.

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2.1.4 Management Responsibility (Mandatory)

What the SQF Code says

- 2.1.4.1 The organizational reporting structure describing those who have responsibility for food safety shall be defined and communicated within the organization. This includes the relationship between the corporate office, brand(s), banner(s), franchise(s) and store(s) and the responsibility for food safety.
- 2.1.4.2 The senior site management shall make provision to ensure fundamental food safety practices are adopted and maintained.
- 2.1.4.3 The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented.
- 2.1.4.4 All staff shall be informed of their responsibility to report food safety problems to personnel with authority to initiate action.
- 2.1.4.5 Job descriptions for those responsible for oversight of food safety program shall be documented and include provision to cover for the absence of key personnel.

2.1.4 Implementation Guidance

What does it mean?

Tangible actions must follow commitment. Management must ensure that the resources required to implement the policy and food safety objectives, are available. Resources are often scarce in many organizations. Regardless, management must demonstrate that employees understand their responsibility for food safety and be allowed the time, tools and authority to carry out these responsibilities.

By providing and communicating an organizational chart and position descriptions that demonstrate the interrelationships and responsibilities within the retailer's facility, each employee will know his/her role in assuring food safety and continuous improvement. This must be understood by all employees and staff members of the site. Management must clearly identify and provide the resources to achieve food safety objectives.

This element also includes the requirements for, and responsibilities of, the SQF practitioner. This is a key role within the retailer's facility, being the person designated by senior management to manage the development, implementation, daily operation, validation and verification of the SQF System.

What do I have to do?

This element is mandatory. The senior responsible person is required to document the organizational reporting structure that describes each position that has responsibility for food safety. The organisational structure provides a snapshot of how these positions interact and share that responsibility.

Senior management must convey this to every employee. This will be written into job descriptions for all roles within the facility that impact food safety. Job descriptions for key personnel must include a provision for coverage on all shifts and replacement during absence. There must be documented instructions and training for all staff to report food safety problems to personnel with the authority to initiate actions.

Senior management must also document how they will provide resources to achieve food safety objectives. They must demonstrate their support of the development, implementation and maintenance and ongoing improvement of the SQF System.

The SQF practitioner is the individual designated by senior management to develop, validate, verify and maintain the company's Food Safety Plans, and assume control of the daily operation of the SQF System. The SQF practitioner may engage the services of an SQF consultant to assist with the development of the SQF System, or support its validation and verification, but overall responsibility remains with the retailer through the SQF practitioner.

The requirements of the SQF practitioner are clearly outlined in 2.1.6.3, and are further described in the SQFI guideline on SQF practitioners. Note that SQF practitioners are not required to complete an Implementing SQF Systems training course or Implementing SQF Systems examination, it is not compulsory although either or both is recommended. However, the practitioner is required to understand and demonstrate knowledge of the SQF Food Safety Code for Retail, edition 8 and its application within the site.

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The commitment of management to ensuring that employees are trained and assessed as competent to carry out job functions pertaining to food safety must be documented. The job descriptions must reflect the competencies required of each employee to carry out their food safety responsibilities and the training that is necessary to assure those competencies (refer 2.9).

Also, management must be able to demonstrate that the goal is not simply to achieve SQF Certification, but that they have processes in place to continuously improve their food safety processes (refer 2.1.6.4.). They must have measures in place to monitor the effectiveness of their SQF System and have programs and activities in place to improve the outcomes. Measures may include, but are not limited to:

- customer complaints (2.1.7),
- audit results (2.1.5.1. and 2.5.1.1.),
- corrective actions (2.1.5.1. and 2.5.2), and
- product withdrawal and recall (2.6.3.2.).

2.1.4 Auditing Guidance

The auditor must avoid making a quick decision on *2.1.4 Management Responsibility*. Although this element is at the beginning of the Code, the auditor is unlikely to make a full judgment on compliance with this element until the end of the audit.

The documented organizational structure and job descriptions shall be audited as part of the initial desk audit. However, during the first and subsequent facility audits, the auditor will check to confirm that the contents of the organizational structure and job descriptions are applied in practice on a daily basis – that a “culture of food safety” has been created.

The credentials of the SQF practitioner shall also be checked at the initial desk audit. However, the competence of the practitioner and his/her ability to effectively manage the SQF System shall be confirmed at each facility audit.

The auditor will seek evidence of compliance to this requirement by observation and interview. Evidence may include:

- There is a current, documented organizational structure in place that identifies those responsible for food safety, and their interrelationship, and is agreed by senior management.
- Job descriptions are in place for positions within the retailer’s facility that have responsibility for food safety. The auditor may question why positions have been vacant for a long period of time or the site chooses to use a large, temporary labor pool.
- Adequate resources are in place to meet food safety objectives and the requirements of the SQF System. This includes coverage for all operational shifts and absences.
- Employees within the facility with responsibility for food safety are clearly identified, are aware of their responsibilities and are trained and competent to carry out these responsibilities.
- Senior management ensures that all designated food safety practices and activities are correctly documented, meet the requirements of the SQF Food Safety Code for Retail and are correctly and fully implemented on all shifts. This would include a review as to the timeliness of implementation of corrective actions, action on complaints, and addressing identified gaps in the facility’s programs.
- There is a designated SQF practitioner who manages the implementation and maintenance of the SQF System on a daily basis.
- The designated practitioner has the qualifications necessary to be an SQF practitioner (identified in 2.1.6.3) and is capable and competent to carry out this function.
- The designated practitioner has the support of senior management and has the time and availability to monitor the effectiveness of the SQF System; is competent and has the authority take appropriate corrective actions when necessary; and communicates to relevant employees any information necessary to maintain or improve the System.
- Senior management has processes in place to measure the effective implementation of the SQF System and initiate, resource and review improvement programs.

2.1.5 Management Review (Mandatory)

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What the SQF Code says

- 2.1.5.1 The senior management shall be responsible for reviewing the SQF System and documenting the review procedure. Reviews shall include:
- i. The Food Safety manual;
 - ii. Internal and external and regulatory audit findings;
 - iii. Corrective actions and their investigations and resolution;
 - iv. Customer and/or consumer complaints and their investigations and resolution; and
 - v. Supplier performance.
- 2.1.5.2 The SQF System in its entirety shall be reviewed at least annually.
- 2.1.5.3 Food safety fundamentals and food safety plans shall be reviewed when any changes implemented have an impact on the organization's ability to deliver safe food.
- 2.1.5.4 Changes to food safety fundamentals and food safety plans that have an impact on the organization's ability to deliver safe food are to be validated.
- 2.1.5.5 Records of all reviews and reasons for amending documents, validations and changes to the SQF System shall be maintained and communicated.

2.1.5 Implementation Guidance

What does it mean?

This element is closely linked to 2.1.2 and is one of the tangible actions which demonstrate management commitment and involvement.

The retailer must review their SQF System when any changes occur that impact food safety. This may include changes to product formulations, raw or packaging materials, processing or packaging equipment or changes to personnel. The SQF practitioner is responsible for managing such changes, but senior management is responsible for authorizing and approving these changes.

Ideally, the SQF System is reviewed on a regular basis as part of a management review of all operational activities. However, at a minimum, a full review of the SQF System must be completed annually by senior management.

What do I have to do?

This element is mandatory. Senior management must ensure the entire SQF System is reviewed. This should be conducted on a regular basis, however as an absolute minimum, annually. This review shall include the policies outlined in company's policy statement, findings from the regularly scheduled internal and external audits, customer complaints, test records, deviation reports and outcomes of corrective actions.

A procedure documenting how the review of SQF System is conducted shall be included in the food safety manual. The review must be conducted by senior management with the objective of ensuring the continued integrity of the food safety management system.

The review shall measure the effectiveness of the SQF System against the food safety objectives established by senior management and the effectiveness of corrective actions taken in response to deficiencies in the System. The focus shall also be on the effectiveness of pre-requisite programs and the ongoing accuracy and validation of the Food Safety Plan (s).

All reviews and major changes to the SQF System shall be recorded by the SQF practitioner, including the reasons for any changes and the actions taken as a result of changes or reviews.

Major changes to a process, a process control or any changes that could impact on the ability of the System to deliver a safe quality food shall trigger a review of the Food Safety Plan in addition to the annual review. Any major changes to Food Safety Plans shall be validated and verified before implementation.

2.1.5 Auditing Guidance

The auditor will seek evidence of the existence of a management review procedure at the desk audit and compliance to this requirement through a review of records and interviews with senior management and the SQF practitioner. Evidence may include:

- Review of the management review procedure.

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- Records of SQF System reviews by senior management and the depth of coverage of the review meetings (e.g., food safety objectives, food safety measures, customer complaints, test records, product and process changes, etc.).
- Identified actions from review meetings, and follow up on progress and outcomes of corrective actions.
- Changes to the products and/or operational processes since the last audit, and the extent to which these changes are reflected in the food safety manual.
- The extent to which changes in materials, process or products have been validated.
- Records of product and process changes and their validation.

2.1.6 Resource Management (Mandatory)

What the SQF Code says

2.1.6.1 The senior site management shall ensure adequate resources are available to achieve food safety objectives and support the development, implementation, maintenance and ongoing improvement of the SQF System.

2.1.6.2 The senior site management shall designate an SQF practitioner with responsibility and authority to:

- i. Oversee the development, implementation, review and maintenance of the SQF System, including food safety fundamentals and the food safety plan outlined in 2.4, 2.1.4 and GRPs.
- ii. Take appropriate action to ensure the integrity of the SQF System; and
- iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

2.1.6.3 The SQF practitioner shall:

- i. Be employed by the organization as a company employee on a full-time basis;
- ii. Hold a position of responsibility in relation to the management of the organization’s SQF System;
- iii. Have completed a HACCP training course;
- iv. Be competent to implement and maintain HACCP based food safety plans;
- v. Have an understanding of the SQF Retail Code and the requirements to implement and maintain SQF System relevant to the organization’s scope of certification; and
- vi. Hold monthly meetings with senior site management to update on the state of food safety.

2.1.6.4 The senior site management shall establish processes to improve the effectiveness of the SQF System to demonstrate continuous improvement.

2.1.6 Implementation Guidance

What does it mean?

Every site senior management team should ensure they have provided adequate resources to develop, implement, establish, maintain and ensure ongoing improvement for the SQF Food Safety System and to meet the current Food Safety Objectives. This usually begins with the assignment of a qualified SQF Practitioner who meets the requirements of the SQF Food Safety Code for Retail who has the written responsibility and authority to oversee the development, implementation, review and maintenance of the SQF System, including food safety fundamentals and the food safety plan outlined in 2.4, 2.1.4 and Good Retail Practices.

The SQF Practitioner also is to take the appropriate action to ensure the integrity of the SQF System and communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System. They must be available to answer employee’s questions and to provide assistance in implementing the SQF System throughout the organization. The SQF Practitioner must be a full-time employee who holds a position of responsibility that relates to the management of the SQF Food Safety system. They must have completed a HACCP Training course (as defined in the SQF Food Safety Code for Retail as recognized as a HACCP training course used extensively in a country; administered and delivered by an institution recognized as a food safety training center of excellence; a duration for a minimum of two days (16 hours), or equivalent and the acquired knowledge of the candidate shall be assessed as part of the training program).

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The senior site management team must ensure that the SQF Practitioner is competent to implement and maintain the SQF HACCP based Food Safety Plans and have a good understanding of the SQF Food Safety Code for Retail and the requirements they must fulfill for the SQF System. The SQF Practitioner must hold monthly meetings with the site senior management team to keep them updated on the status of the SQF Food Safety system. The senior site management team along with the SQF Practitioner must develop the appropriate processes to improve the effectiveness of the overall SQF System and to be able to demonstrate that the site has a continuous improvement process for the SQF Food Safety system.

What do I have to do?

Senior management should establish a budget for establishing, implementing and maintaining an SQF System. This means money, equipment, supplies, personnel and time to fully develop a SQF Food Safety System for the retail site. It all starts with selecting the SQF Practitioner to lead the effort for the journey of SQF certification. The sites that tend to be successful actually create an effective food safety working culture throughout the organization. It is much easier to accomplish this new working culture with having a SQF Practitioner in each major department. These practitioners then are responsible for establishing the SQF system in their departments (policies, procedures, work instructions and can hold their employees accountable to the SQF Food Safety Code for Retail). All of these people have to be trained on the system they are establishing and the working culture they are working to obtain. This includes training for a full-time employee(s) on a certified HACCP training program, the SQF Food Safety Code for Retail (either through an instructor led course, online training or reading the code themselves) and some other very valuable training courses like internal auditing, root cause analysis, environmental monitoring and sanitation for retail organizations to name a few that might be offered by the SQF Training Centers. The senior leadership will need to construct a written document assigning the SQF Practitioners to their new role and explain the responsibilities for developing, implementing, maintaining and improving the SQF system throughout the organization and to ensure that all employees are fully aware of their role in the SQF food safety system and be there to answer questions and to ensure the integrity of the SQF Food Safety system. The senior site management and the SQF Practitioner(s) must hold monthly meetings to keep the senior management team up-to-date on the current status of the SQF Food Safety System and Food Safety Objectives. These meetings must be documented with the topics covered, actions needed, taken previously and what the current status is on each objective and the overall SQF Food Safety system. The formats of these documents are not audited, but the content showing evidence that these requirements of the SQF Food Safety Code for Retail are being met.

2.1.6 Auditing Guidance

The auditor will seek evidence of compliance to this requirement by observation, interviews and document reviews. Evidence may include:

- Adequate resources (money, equipment, supplies, personnel and time, etc.) are in place to meet food safety objectives and the requirements of the SQF System. This includes coverage for all operational shifts and absences.
- Employees within the facility with responsibility for food safety are clearly identified, are aware of their responsibilities and are trained and competent to carry out these responsibilities.
- Senior management ensures that all designated food safety practices and activities are correctly documented, meet the requirements of the SQF Food Safety Code for Retail and are correctly and fully implemented on all shifts. This would include a review as to the timeliness of implementation of corrective actions, action on complaints, and addressing identified gaps in the facility's programs.
- There is a designated (in writing) SQF practitioner who manages the implementation and maintenance of the SQF System on a daily basis.
- The designated practitioner has the qualifications necessary to be an SQF practitioner (identified in 2.1.6.3) and is capable and competent to carry out this function.
- The designated practitioner has the support of senior management and has the time and availability to monitor the effectiveness of the SQF System; is competent and has the authority take appropriate corrective actions when necessary; and communicates to relevant employees any information necessary to maintain or improve the SQF System.

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2.1.7 Complaint Management

What the SQF Code says

- 2.1.7.1 The methods and responsibility for handling and investigating the cause and resolution of complaints from customers, consumers and authorities related to food safety shall be documented and implemented.
- 2.1.7.2 A method for transfer of complaint data to suppliers, agents, brokers and vendors shall be documented and implemented.
- 2.1.7.3 Trends of customer and consumer complaint data shall be investigated and analyzed by personnel knowledgeable about the incidents.
- 2.1.7.4 Corrective action shall be implemented commensurate with the seriousness of the incident and as outlined under 2.5.2.
- 2.1.7.5 Records of customer and consumer complaints and their investigations shall be maintained.

2.1.7 Implementation Guidance

What does it mean?

Customer complaints provide an important measure of how well the SQF System is performing. By accurately recording customer complaint types, a retailer can objectively measure changes in their management system and show improvements in a process. Customer complaints may also show trends that have not been identified during processing (such as deli, bakery, produce and meats, etc.) and normal process control checks. Customer complaints can also provide information about how the supplier approval program is working as complaints can be for problems that occurred at a manufacturing facility who supplies the retailer. The customer complaint program must be able to differentiate those complaints for retailer processes and activities and those from a supplier. The SQF Food Safety Code for Retail, edition 8 requires the retailer to implement a procedure for resolving customer complaints for both internal and those from a supplier. The procedure shall outline the methods used and identify responsibilities for ensuring complaints are investigated and appropriate action is taken and all complaints are reviewed for trends and resolutions.

What do I have to do?

Although this is not a mandatory element, it is extremely unusual for retailers NOT to have any customer complaints.

The retailer shall develop a procedure showing how customer complaints are received, investigated and responded to and the methods used to investigate individual food safety complaints and overall complaint trends for both complaints against retailer processes and activities and those against supplier processes and activities.

The procedure must detail the responsibility for investigating customer complaints, performing root cause analysis, initiating follow up actions and communicating back to the customer how the complaint has been resolved. The procedure should include criteria for the determination of the validity of complaints.

Any trending or data management of complaints need to be included in the procedure. The procedure can include criteria when trends show issues that require corrective action plan development and/or process adjustment. Complaints may be locally received or received from a central site, call center, or corporate entity and shall include complaints from customers, consumers and/or regulatory authorities. All should be available for use in the complaint procedure.

In the case of when the site's corporate entity is responsible for creating and executing the complaint management program, the procedure must describe how the site is made aware of the program, how it is communicated to the site, how the site has implemented the program, how root cause analysis is being conducted and how the site verifies that the program is being followed. The site will need to verify how it is using the information that is provided by corporate to develop corrective action plans.

Records of complaints must be retained and include any root cause analysis and corrective actions taken by the retailer and/or supplier to the retailer.

2.1.7 Auditing Guidance

Customer complaints may be the first record that an auditor asks to review when beginning the facility audit. Customer complaints can provide an auditor insight into the performance of the retailer's SQF System and any trend areas that may require greater focus. The customer complaint procedure shall be reviewed during the desk audit and the implementation of the procedure (including follow-up, root cause

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analysis and corrective actions) checked as part of the facility audit by interview, observation and review of records. Evidence may include:

- Review of customer complaint records (i.e., complaints from consumers and/or regulatory authorities);
- Review of the customer complaint procedure including the responsibility for collecting customer complaint data, investigating complaints, root cause analysis and managing corrective action;
- Investigation of the interface between a corporate reporting function and facility knowledge and investigation of customer complaints (where applicable);
- Investigation of outcomes of corrective actions taken as a result of customer complaint investigations.

2.2 Document Control and Records

2.2.1 Document Control (Mandatory)

What the SQF Code says

2.2.2.1 The methods and responsibility for maintaining document control and ensuring staff have access to current documents shall be documented and implemented.

2.2.2.2 A register of current SQF System documents and amendments to documents shall be maintained.

2.2.2.3 Documents shall be safely stored and readily accessible.

2.2.1 Implementation Guidance

What does it mean?

This element relates back to *2.1.3 Food Safety and Quality Management System*. All management system documents (e.g., policies, procedures, specifications, food safety plans, work instructions), plus any other operational reference documents (e.g., external codes, regulations, equipment instructions, etc.), must be controlled to ensure their currency and relevance. This includes forms which are the templates for records that are used to report test, inspection and audit results.

Documents can be stored electronically or be paper-based, or a blend of both. However, the current copy of the relevant documents must be available to staff and employees that need to use them. A list of documents and amendments to documents must be maintained to identify the current documents in use.

What do I have to do?

This element is mandatory. To comply with this requirement, the retailer must designate a staff member who is responsible for document storage and security and how documents are controlled; distributing current versions to relevant employees; and ensuring that documents are up-to-date and were approved through a documented approval process. Worn, illegible or out-of-date documents must be replaced. A written procedure describing how documents will be maintained, updated and replaced must be developed and in place and being used.

A register of all documents must be maintained including when they were issued, updated and who has a copy of each document. Documents referred to include, for example, pre-requisite programs, food safety plans, sanitation procedures (SSOPs), other program procedures (SOPs), other work instructions and product specifications, etc. Any document supporting the overall SQF Food Safety System must be included on the register of documents. Other documents that are included are maintenance documents for equipment and facility, **internal** documentation for contractors (cleaning crews, waste and recycling removal, pest control, etc. must be on the register. It is important for the SQF Practitioner to see all of the documentation that is used to effectively operate and maintain the SQF System and the document register helps the Practitioner to see and track all of those documents.

Any requirements for corrections or maintenance of records must be recorded in document control procedures, including the appropriate methods for addressing corrections and how to handle damaged food safety records.

2.2.1 Auditing Guidance

The auditor needs to seek evidence of the existence of a document control procedure at the desk audit and compliance to this requirement by observation, interview with the responsible person and interviews with

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staff to ensure they have current documents available and records reviews. Evidence may include:

- Review of the document control procedure;
- Review of the document register and list of amendments, and their accuracy;
- Availability and currency of documents in use;
- Security and storage of documents;
- All personnel who need access to specific documents such as food safety plans, procedures, customer specifications and applicable food regulations have such access.

2.2.2 Records (Mandatory)

What the SQF Code says

2.2.3.1 The methods and responsibility for undertaking monitoring activities, verifying, maintaining and retaining records shall be documented and implemented.

2.2.3.2 All records shall be legible and suitably authorized by those undertaking monitoring activities that demonstrate inspections, analyses and other essential activities have been completed.

2.2.3.3 Records shall be readily accessible, retrievable, securely stored to prevent damage and deterioration and shall be retained in accordance with periods specified by organization's own policies, a customer or regulations.

2.2.2 Implementation Guidance

What does it mean?

Records are the information about operations and activities that support the SQF Food Safety system and are recorded on forms, which must be clear, concise, legible and accurate. Records must be stored so as to not be damaged so they can be retrieved for investigation purposes. Storage can be electronic or paper-based. The SQF Food Safety Code for Retail, edition 8 states that records must be suitably authorized and must be stored as required by the corporation or legislation.

Various functions or departments within the business may be responsible for completing records, including those who are responsible for monitoring, testing, and/or internal auditing. Other staff members (including the SQF practitioner) may be responsible for verifying the accuracy of records, and one or more may be responsible for retrieving and storing records for the appropriate retention period. All such individuals must be identified and made aware of their responsibilities.

What do I have to do?

This element is mandatory. The retailer must develop a written procedure documenting responsibility for completing records (e.g., monitoring records, inspection and test records, etc.) and identifying those responsible for verifying the records.

Records must be retained under secure conditions as required by internal specifications and legislation.

Employees who are responsible for monitoring and recording activities must be made aware of the importance of maintaining all records in a clear and legible manner and the importance of recording the information at the time the activity is performed.

The employees responsible for monitoring critical food safety points or controls (CCPs) in the process are required to sign the record indicating the entry and the date it was made (or electronically authorize the entry). In addition, the retailer is required to ensure that staff responsible for verifying food safety records signs and dates each record they review as part of their verification activities. These responsibilities and actions must be documented in the procedure.

Electronic records are acceptable. The retailer must have the means to manage electronic security of records, electronic signatures of monitors and reviewers and the means for electronic review.

On paper-based records, the use of correction fluid to address corrections is not recommended. A line through the inaccurate recording, with accurate recording and initials of the monitor is recommended.

There is no prescribed duration for retention of records. For some retailers, it may be prescribed by legislation, internal requirements or insurance coverage. Apart from those requirements, the general rule is to retain records for beyond the next recertification audit, as a minimum. Most companies retain records for at least two years where there is no formal regulatory requirement.

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2.2.2 Auditing Guidance

At the desk audit, the auditor will seek evidence of the existence of procedures or work instructions for monitoring activities, verification activities, and record storage. At the facility audit, the auditor will review a sample of records selected by the auditor and may interview employees who complete the records. Evidence may include:

- Documented procedures defining the methods and responsibilities for undertaking activities to monitor critical control points and other activities necessary to maintain food safety, and accurately and legibly recording results;
- Documented procedures defining the methods and responsibilities for verifying monitoring activities and accurately and legibly recording results;
- Documented procedures defining the methods and responsibilities for undertaking testing and/or auditing activities and accurately and legibly recording results;
- Accurate and legible records for all required activities;
- Understanding of actions required when recorded results show deviations from required values (e.g., outside critical limits);
- Records are securely stored and accessible.

It must also be mentioned that intentional, systemic falsification of records can result in a critical non-conformity and an immediate failure of an SQF certification or recertification audit and a potential withdrawal of the SQF certificate.

2.3 Specification and Products

2.3.1 Contract Service Providers

What the SQF Code says

2.3.1.1 Specifications for contract services that have an impact on food safety shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of contract personnel (examples include, but not limited to: in-store demo company, pest control, maintenance, sanitation, water purification, external auditing, etc.).

2.3.1.2 A register of all contract service specifications shall be maintained.

2.3.1 Implementation Guidance

What does it mean?

Many duties within the food production or processing facility may be conducted by individuals or organizations that are not employed by the business, but are contracted to provide specialist services. These may include companies involved in transport, construction, contract labor hire, engineering, pest control, sanitation, chemical management, trash collection, refrigerated storage or uniform cleaning.

The contract service does not need to directly involve product safety, but could still indirectly affect the products or facility. For example, construction engineers may not have direct contact with food handling, but their work and presence in a food handling facility can indirectly impact food safety.

This element of the Code addresses how the services from these outside organizations are controlled, monitored and verified to ensure that food safety is maintained and specifications are achieved.

What do I have to do?

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Specifications for all foods processed (deli, meat, produce, bakery, etc.) must be established and available to relevant staff, all contract service providers must also have the specifications of what services they provide and all associated contract (and sub-contract) personnel must be trained in the proper practices to follow when on site to protect foods being handled, processed and stored at the site. The specification may be included in the contract, and will describe fully the services provided, and how the safety of products on site are protected from the actions and presence of contract personnel. This will include, as necessary, the qualifications of contract personnel and the review and a local retailer approval for all equipment, tools, and chemicals permitted on site (e.g. a “no glass” policy).

Contractors working within the facility will be subject to the same personal hygiene and welfare conditions as employees. These conditions shall be included in the contract specification.

The specification must include the training required by contract service providers. Training examples could be training done by service providers, training completed by retailer or certification as demonstration of training.

All current specifications for contract service providers must be included on a register (list).

2.3.1 Auditing Guidance

The auditor will seek evidence of the existence of a register of contract service specifications and will review a sample of specifications to ensure compliance with the requirements of the Code. Evidence will be sought by interview, review of specifications, and observation, and may include:

- Review of selected sample of contract service specifications to confirm compliance with the SQF Food Safety Code for Retail, edition 8 requirements, including personnel hygiene and welfare;
- Qualifications and credentials of contract staff;
- Knowledge of contract service and Code requirements by contract personnel.

2.3.2 Third Party Operators

What the SQF Code says

2.3.2.1 Specifications for third party operators that have an impact on food safety shall be documented, current, include a full description of the product or service to be provided and describe relevant training requirements for contract personnel (examples include, but not limited to: sushi, butchery, confectionary, bakery, deli, foodservice, etc.).

2.3.2.2 The methods and responsibility for ensuring all agreements relating to food safety and product requirements and its realization and delivery are specified and agreed shall be documented and implemented.

2.3.2.3 The organization shall:

- i. Verify compliance that the federal, state and local food safety requirements are being met at. Products and/or processes of in-store vendors that are considered high risk shall be required to undergo an audit by the organization or other third-party agency to confirm compliance to the SQF Code and agreed arrangements; and
- ii. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel.

2.3.2.4 Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.

2.3.2 Implementation Guidance

What does it mean?

Many duties within the food retail business such as sushi preparation, meat and poultry preparation, confectionary, bakery, deli, and other foodservice operations may be conducted by individuals or organizations that are not employed by the business, but are contracted to provide specialist services.

The contract service often has direct involvement with product safety or could indirectly affect the product or facility. There must be a procedure to manage these services to ensure food safety is not compromised and that all regulatory requirements (federal, state and local) are being met. All high-risk operations must undergo an audit by the retail organization or through the use of qualified third party agency to audit for

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compliance to the SQF Food Safety Code for Retail. All contracts must be reviewed and agreed upon and the reviews and agreements must be documented.

This element of the Code addresses how the services from these outside organizations are controlled monitored and verified to ensure that food safety is maintained and customer specifications are achieved.

What do I have to do?

Just as with other contracted services, the vendors working within the retail facility (deli, bakery or food sample preparation for consumers, etc.) must have food safety specifications (either in a specification document or within a contract) in place for all providers of contracted services. The contract or specification will describe fully the services provided, and how the safety of products are protected from the actions and presence of contract personnel. This will include, as necessary, the qualifications of contract personnel and the equipment, tools, and chemicals permitted on site (e.g. a “no glass” policy).

Contractors working within the facility will be subject to the same personal hygiene and welfare conditions as employees. These conditions shall be included in the contract specification or agreement. All changes to agreements must be communicated to all involved parties before the changes are implemented. All changes must be properly documented.

The specification must include the training required by contract service providers. Training examples could be training done by service providers, training completed by retailer or certification as demonstration of training.

All current specifications for contract service providers must be included on a register (list).

2.3.2 Auditing Guidance

The auditor will seek evidence of the existence of a register of contract service specifications and will review a sample of specifications to ensure compliance with the requirements of the Code. Evidence will be sought by interview, review of specifications, and observation, and may include:

- Review of selected sample of contract service specifications to confirm compliance with the SQF Food Safety Code for Retail, edition 8 requirements, including personnel hygiene and welfare;
- Qualifications and credentials of contract staff;
- Knowledge of contract service and Code requirements by contract personnel.

2.3.3 Purchasing

What the SQF Code says

2.3.3.1 A buying standard shall be in place for all externally sourced product that meets the corporate office food safety requirements and comply with the relevant legislation.

2.3.3.2 Raw materials, ingredients, packaging materials, services and pre-packaged food that impact food safety shall be supplied by an approved supplier (this includes agent, broker, distributor and vendor).

2.3.3.3 In the event that emergency sourcing is necessary, a procedure shall be developed that requires the supplier to meet the organization’s food safety requirements and that defines how the store conducts inspection or evaluation before use.

2.3.3 Implementation Guidance

What does it mean?

The objective of this element is to ensure that all incoming materials and services meet specifications/laws, are safe and come from an approved supplier. This element (2.3.3.) works very closely with the next element (2.3.4.) with the main difference being this element covers the purchasing of materials from an approved supplier and that all materials must meet all regulatory requirements. The next element covers the approval process and how to approve, monitor, correct problems and potentially remove poor performing suppliers from the program.

An approved supplier program is a set of procedures designed and implemented by the retailer to assure the safety of incoming goods and services. It may be based on the safety risk presented by the raw materials (such as bakery flour), ingredients (bakery, deli or meat department), packaging materials (such as carry out containers or packaging), services and pre-packaged foods, or based on historical performance or prior history

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of the supplier. The procedures must include the process for approving, monitoring and correcting problems as well as removing suppliers when appropriate.

What do I have to do?

The retailer must be able to provide documented evidence that incoming materials have either been inspected or that they come from an approved supplier. The methods for selecting, evaluating, approving, monitoring and correcting/removing an approved supplier must be documented. This will be risk-based and may be as simple as a good supply history, sourcing from certified suppliers (e.g. SQF certified suppliers) or personally auditing/inspecting the material supplier's operations, depending on risk, supplier knowledge and past history. The retailer must require their material suppliers to verify they are complying with specifications for the products supplied. The methods of analyses must conform to recognized industry standards. The job functions responsible within the retailer business for material inspections and supplier approval must be included in the job descriptions outlined in 2.1.4.5.

The approved supplier program must include providers of contract services such as transport, pest control, maintenance, labor hire, bakery, deli, vendor food sample preparation, etc. The program will identify methods to ensure service providers and their staff adhere to the specifications outlined in 2.3.1.

The retailer must maintain a list of approved suppliers, including contract service providers. All providers of goods and services must be included on the register.

The approved supplier program shall be reviewed at least annually or more frequently, based on supplier performance.

The receipt of materials from non-approved suppliers is acceptable, but only in an emergency situation, and provided the materials are inspected or analyzed before use to ensure there is not a risk to food safety.

Records of the use of non-approved suppliers and their inspections shall be maintained.

2.3.3 Auditing Guidance

During the desk audit, the auditor shall review the documented approved supplier program. However, compliance to this element will mainly be reviewed during the facility audits. The approved supplier will be audited by interview, observation and review of records. Evidence may include:

- Review of the documented approved supplier program to ensure all materials and services that may impact on product safety are included;
-

2.3.4 Supplier Approval and Performance

What the SQF Code says

2.3.4.1 Pre-packaged foods, raw materials, ingredients, packaging materials, and services that impact on finished product safety shall be supplied by an approved supplier (this includes agent, broker, distributor and vendor).

2.3.4.2 The receipt of pre-packaged foods, raw materials, ingredients, and packaging materials received from non-approved supplier shall be acceptable in an emergency situation provided they are inspected or analyzed before use.

2.3.4.3 The responsibility for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented.

2.3.4.4 The approved supplier program shall be based on the prior performance of a supplier and the risk level of the pre-packaged foods, raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum:

- i. Agreed specifications;
- ii. Reference to the rating of the level of risk applied to products, raw material ingredients, packaging materials and services and the approved supplier;
- iii. A summary of the food safety controls implemented by the approved supplier;
- iv. Methods for granting approved supplier status (including regulation, recall and specification);
- v. Methods and frequency of monitoring approved suppliers;
- vi. Details of the certificates of conformance if required, and
- vii. Methods and frequency of reviewing approved supplier performance and status.

2.3.4.5 A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained.

2.3.4.6 Priority of supplier performance:

- i. The supplier performance shall be based on the risk of the food, packaging materials and service along with the prior historical performance of the supplier,

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- ii. The results of evaluations, investigations and follow-up actions shall be recorded.

2.3.4 Implementation Guidance

What does it mean?

The objective of this element is to ensure that all incoming materials and services meet specifications and are safe. This element links with 2.3.3. This element covers the process for approving suppliers (such as the requirement to provide product specifications, Certificates of Conformance, certificates of analysis or treatment, certificates of guarantee), the monitoring of their performance (using a system to collect the performance of service at each store), identifying the risk level of both the materials they deliver and the performance of their service. The risks must be ranked from high to low and could potentially be listed using a numeric scale (such as a 1 to 10 scale). The documentation to show the entire supplier approval program must be available for review and must be included in the review process at least annually or when there are changes that affect the food safety risks of this program, products or processes.

What do I have to do?

The retailer must be able to provide documented evidence that incoming materials have either been inspected (emergency purchase) or that they come from an approved supplier. The methods for selecting, evaluating, approving and monitoring an approved supplier must be documented. This will be risk-based and may be as simple as a good supply history, sourcing from certified suppliers (e.g. SQF certified suppliers) or personally auditing/inspecting the material supplier's operations, depending on risk, supplier knowledge and previous history.

The retailer must require their material suppliers to verify they are complying with specifications for the products supplied. The methods of analyses must conform to recognized industry standards. The job functions responsible within the retailer business for material inspections and supplier approval must be included in the job descriptions outlined in 2.1.4.5.

The retailer must maintain a list of approved suppliers, including contract service providers. All providers of goods and services must be included on the register.

The approved supplier program shall be reviewed at least annually or more frequently, based on supplier performance.

The receipt of materials and services from non-approved suppliers is acceptable, but only in an emergency, and provided the materials and services are inspected before use to ensure there is no risk to food safety. Records of the use of non-approved suppliers and their inspections and analyses shall be maintained.

2.3.4 Auditing Guidance

During the desk audit, the auditor shall review the documented approved supplier program. However, compliance to this element will mainly be reviewed during the facility audits. The approved supplier will be audited by interview, observation and review of records. Evidence may include:

- The risk rating applied to suppliers is identified and controls implemented;
- There is a register of approved suppliers;
- All materials or services in-use are included on the supplier register or listed as a non-approved supplier;
- Approval methods test for compliance with agreed specifications;
- The program specifies actions to be taken when non-compliance is identified;
- Documented test/inspection methods and corrective actions have been followed;
- Relevant staff are aware of their responsibilities and duties with regard to inspection and receiving of incoming goods;
- The approved supplier program is modified based on supplier performance;
- Where non-approved suppliers have been used, goods have been inspected and a record kept;
- The approved supplier program is reviewed at least annually.

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2.4 Attaining Food Safety

2.4.1 Food Safety Plan (Mandatory)

What the SQF Code says

2.4.1.1 Food safety plan shall be developed, effectively implemented, and maintained and outline the means by which the organization controls and assures food safety. Food safety plan shall:

- i. Include a hazard and risk management system that includes prerequisite programs. Prerequisite programs may include but are not limited to:
 - Sanitation
 - Pest Control
 - Facility and Maintenance
 - Personal Hygiene
 - Training
 - Purchasing
 - Transportation
- ii. Allergen Control
- iii. Be prepared using a HACCP based system or another Hazard and Risk Management System that covers the Codex Alimentarius HACCP Principles.
- iv. Cover a product or product group and the associated processes. Process HACCP methods may be used.
- v. Describe the methodology and results of a hazard analysis conducted to identify food safety hazards associated with all inputs and process steps including rework, food recovery and food donation.
- vi. Prescribe those measures taken to apply the controls implemented that are critical to assuring, monitoring and maintaining food safety.
- vii. Include process controls at control points in production to monitor product safety, identify when a process is deviating from set parameters and make corrections to keep a process under control; and
- viii. Include documented Preventive Controls, Standard Operating Procedures (SOPs), Standard Sanitation Operating Procedures (SSOPs) and Work Instructions (WI) applicable to the organization’s store's scope of certification.

2.4.1.2 The organization shall ensure that, at the time of sale to its customer and/or consumer, the food sold shall comply with the legislation that applies to the food and its production in the country of its origin and destination. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, nutritional, allergen and additive labeling, and to relevant established industry codes of practice.

2.4.1.3 The methods and responsibility for ensuring the organization is kept informed of changes to relevant legislation, scientific and technical developments and relevant industry codes of practice shall be documented and implemented.

2.4.1.4 The property, buildings and equipment shall be located, constructed, designed and maintained to facilitate the hygienic production, handling, storage, sale and/or delivery of safe food.

2.4.1.5 The organization shall ensure the food safety fundamentals described in the relevant modules of this Code are applied, or exempted according to a risk analysis outlining the justification for exclusion or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

2.4.1.6 Those pre-requisite programs applicable to the scope of certification that outline the means by which food safety is controlled and assured shall be documented and implemented.

2.4.1.7 The effectiveness of the pre-requisite programs shall be verified as described in 2.4.3.5.

2.4.1 Implementation Guidance
What does it mean?

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The HACCP Food Safety Plan is the foundation of the retailer's SQF System. The Food Safety Plan (FSP) must be prepared using the HACCP method, which means that all products and processes included in the SQF scope of certification must be addressed in one or more HACCP plans. Either the Codex or NACMCF HACCP model can be used. All HACCP principles and implementation steps must be included in the HACCP Food Safety Plan. The HACCP Plan must be fully developed by the retailer, meaning the retailer may use the services of an SQF consultant, but takes full responsibility for the HACCP plan.

It is self-apparent but important to recognize that the HACCP plan cannot just be paper-based, but must be fully implemented. The HACCP system implemented by the retailer must be, systematic, comprehensive, and thorough.

What do I have to do?

This element is mandatory. The retailer must develop and fully implement a Food Safety Plan using the Codex or NACMCF HACCP method, that at a minimum follows the twelve HACCP implementation steps:

1. A multi-disciplinary HACCP team must be implemented which includes expertise on the process, product and food safety. A team leader must be appointed that is fully trained in the HACCP process. This team leader may be the SQF practitioner. Training must also be provided for all HACCP team members. The scope of the HACCP Food Safety Plan must also be determined, e.g. the products included in the plan and the start and end points of the process under consideration.
2. Product descriptions must be prepared for all products included in the HACCP Plan that includes all relevant product safety information. This may or may not already be included in the product specifications.
3. The intended use of each of the products included in the scope must be identified, e.g. is the product intended to be further processed (such as a meal kit taken home by consumer to follow the recipe), or cooked by the consumer prior to consumption (such as a made to order pizza to be cooked at consumers home), or is it ready-to-eat. Is the product intended for consumption by a vulnerable group, or by the general population (remembering that general population includes vulnerable consumers)?
4. Construct a process flow diagram that covers the agreed scope (see step 1 above) of the process and includes all process inputs (e.g., raw materials, packing materials, processing aids), and outputs (including second grade product, product for rework). Every step in the process must be identified.
5. The HACCP team must walk the process and confirm the flow diagram, including any variations on back shifts or overtime shifts and include split work (such as prepared in one department and served in another). The HACCP team leader must sign off on the flow diagram.
6. Steps 1 through 5 allow the HACCP team to gather all the necessary information to complete step 6, which is also Principle 1 of HACCP. This step can be separated into three components:
 - a) For each step of the process identified in step 5, the HACCP team must identify all food safety hazards, including potential food safety hazards. Hazards will, at a minimum, be classified as microbiological, chemical and physical, but may also at the discretion of the retailer separate out allergens, microbial contamination, microbial growth, radiological hazards, metal, glass, etc.
 - b) For each identified hazard, conduct a hazard analysis to determine the potential likelihood of the hazard occurring and the severity if it did occur (collectively referred to as the significance). There is no specified methodology for conducting a hazard analysis, although there are many methodologies used within the food industry. SQFI expects that the method used is logical, evidence based, science based and consistently applied across all identified hazards in the HACCP Plan, and documented.
 - c) Determine the control measures required for each identified hazard, and ensure procedures (SOPs) and/or work instructions are in place to apply this control.
7. Critical Control Points (CCPs) are steps in the process where control is essential to eliminate an identified hazard or reduce it to an acceptable level, e.g. cooking, etc. Codex includes a decision tree for determining CCPs, which works well for microbiological hazards. Again the methodology chosen for determining CCPs must be applied consistently.

If a hazard has been identified and no control measure exists for that hazard, then the process must be changed to ensure control can be applied at some point in the process.
8. All subsequent steps in the HACCP Plan relate to CCPs. Critical limits are according to the Codex definition, "criteria that separate acceptability from unacceptability." They are values that are set and easily measured, that identify "safe" from "unsafe" product. Critical limits must be established for each CCP and must be scientifically validated (refer 2.4.3.3.), or justified by regulation or industry code of practice.

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9. Monitoring is the regular testing, or measurement of critical limits to ensure the process remains “safe.” The HACCP plan must identify, for each CCP, what is to be measured; who (i.e., which position) is responsible for testing/measuring; when testing is to be carried out (e.g., every hour, once per shift), and how the testing is to be carried out. Monitoring applies to each CCP and must be supported by work instructions and training of operators designated to carry out monitoring.
10. For each CCP, corrective actions must be established to identify action that will be taken for every deviation from critical limits (refer 2.5.2.1.). HACCP is a proactive system – it pre-determines actions that will be taken before they occur. Therefore, corrective actions detailed in the HACCP Plan must be clear, concise and unambiguous. They must include actions to address or dispose of affected product (i.e., back to the last “good” check), and actions necessary to correct the process and prevent recurrence. Responsibilities for corrective actions must be identified.
11. Verification applies to the application of observations, records reviews, testing, audits and other procedures, other than monitoring, to determine compliance with the HACCP Plan. Verification is covered in element 2.4.3.4. The HACCP Food Safety Plan must be included in the food safety manual (refer 2.1.3.1) and controlled as per 2.2.1. Records of monitoring, corrective actions and verification activities must be secured and retained according to 2.2.2.

The HACCP Plan is not a static document. Critical limits must be re-validated at least annually (refer 2.5.2.1 v) by the SQF practitioner, and the entire Food Safety Plan verified annually. When changes occur in the process, the HACCP Plan must be updated and re-validated to reflect the changes (refer 2.4.3.3).

2.4.1 Auditing Guidance

The HACCP Food Safety Plan shall be reviewed by the auditor at the initial desk audit to ensure all products within the supplier’s scope are covered, all potential hazards are identified and the HACCP implementation steps have been followed. The HACCP Food Safety Plan, plus changes to the HACCP plan, shall be reviewed in full at every subsequent facility audit. Implementation of the HACCP plan will be checked by interview, observation and review of records. Evidence may include:

- The HACCP team is in place, includes expertise of the subject process, and members are trained in HACCP principles;
- The HACCP team has been fully involved in the development and review of the HACCP system;
- The product and process scope of the HACCP plan is defined;
- Product descriptions are available and include relevant safety information;
- The intended use of the product is clearly defined;
- A process flow diagram has been developed and includes all process steps, inputs and outputs. It has been confirmed by the HACCP team;
- Verification that a system to review technical and scientific information about potential hazards exists and is utilized prior to performing any hazard analysis at the site;
- Potential hazards have been identified for all process steps and a hazard analysis conducted using a consistent and valid method;
- Control measures are in place for all identified hazards and procedures/work instructions are effectively implemented;
- CCPs are correctly identified using a valid methodology;
- Critical limits are in place for every CCP, and are validated to ensure consistent product safety;
- All critical limits are monitored and test procedures, responsibilities, and frequency fully documented and implemented;
- Corrective actions are documented, are clear and unambiguous, and determine the disposition of product and action required to prevent recurrence;
- The corrective action procedure has been followed when monitoring shows deviation from critical limits;
- Staff with responsibility for monitoring, validation, verification of critical limits, or any other food safety control measures are aware of their responsibility, trained, and are carrying out their functions correctly;

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The SQF practitioner ensures that the Food Safety Plan is effectively developed, implemented, maintained, and verified.

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2.4.2 Control of Non Conformity (Mandatory)

What the SQF Code says

2.4.2.1 The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, re-work, packaging or equipment detected during receipt, storage, processing, handling, offering for sale or delivery is handled shall be documented and implemented. The methods applied shall ensure:

- i. Non-conforming product or equipment is repaired or disposed of in a manner that minimizes the risk of inadvertent use, improper use and is clearly controlled to prevent unintended offering for sale, use or delivery.
- ii. The responsibility and methods outlining how the product is reworked (recycled or recouped) shall be documented and implemented.
- iii. Appropriate reporting procedures to and from corporate office, brand(s), banner(s), franchise(s) and store(s).

2.4.2 Implementation Guidance

What does it mean?

Non-conforming product is product at any stage in the process that does not meet agreed food safety criteria. This can apply to raw materials, ingredients, packaging materials, work-in-progress or finished product. It can also apply to any other material used in the facility that can impact product safety, e.g. cleaning chemicals, processing aids.

This element also includes how the retailer deals with non-conforming equipment.

What do I have to do?

The retailer must document the procedure that outlines how to label and identify products that are rejected or quarantined as a result of inspection, audit, notification of withdrawal or recall from a supplier or regulatory agency or process deviation. The retailer must describe how non-conforming product is isolated in order to avoid its re-use, sale or donation.

In circumstances where product is adulterated or condemned, the retailer must detail how the condemned product is identified and disposed of.

The retailer must also document a procedure for equipment that has been found to be non-conforming. This procedure may be combined with, or separate from, that for non-conforming product. The equipment must be identified and placed out of use (to prevent inadvertent use) until it is repaired or otherwise disposed of.

The means of identification of non-conforming product and equipment must be communicated to relevant staff. This can be a system of tags, signs, designated storage locations, system holds or other methods that meet the intent of this section.

The retailer is required to keep all records of the disposition of non-conforming product and equipment including product that is reworked, repackaged, condemned and/or disposed of.

2.4.2 Auditing Guidance

The auditor will review the non-conforming product/equipment procedure at the desk audit, and compliance to this requirement by observation, interview and review of records at each facility audit. Evidence may include:

- Review of the procedure for non-conforming product/equipment;
- Identification of non-conforming product and/or equipment and the action taken;
- Records of product that has not met specification
- Records of product testing that is out of microbial specification and how it has been resolved
- Records of product disposition;
- Records of repair of non-conforming equipment.

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2.4.3 Hazard and Risk Management System (Mandatory)

2.4.3.1 Hazard and Risk Management System

What the SQF Code says

2.4.3.1.1 The organization shall have a hazard and risk management system in place including a prerequisite program. The organization's system shall follow food safety procedures as outlined in 2.4.

2.4.3.1 Implementation Guidance

What does it mean?

Retailers often have activities and services that entail preparation of food items such as bakeries, delis, produce and meat departments and could have other areas where food is prepared for consumers (vendor sample prep on the grocery store floor). Each of these types of activities as well as everyday operations using pre-requisite programs (such as sanitation, pest control, equipment maintenance, etc.) require the use of risk assessments to be performed prior to that activity. This means that a complex system of every employee performing simple risk assessments as they do their jobs ensures risks are identified and hazards are controlled consistently throughout the operation.

What do I have to do?

Employees must be properly trained on the hazards they work with every day and to fully understand the controls that were designed as part of the procedure or work instruction to control the identified hazard. This is helping to establish an effective food safety working culture throughout the organization. Once the employees are trained, they have to be observed and evaluated for competence and deemed qualified to perform the jobs assigned. Part of the job assigned must be to constantly be aware of the hazards in the areas where they are working and to ensure the proper controls are in place and are preventing the foods from being contaminated from pathogens or cross contacted with allergens that do not belong on the products being handled or processed or packaged. The documentation starts with the hazard analysis under 2.4.1. and continues through the written job descriptions and work instructions provided to the employee and the training documentation used to train the employees. All of these documents should show the overall risk assessment process and employee awareness of the hazards and controls in their work area.

2.4.3.1. Auditing Guidance

Auditors will review the hazard analysis and work procedures and training materials to ensure they were designed to meet the SQF Food Safety Code for Retail, edition 8 at the Desk audit. The auditor will review compliance to this requirement by observation, interview and review of records at each facility audit. Evidence may include:

- Review of the documentation where employees followed procedure for performing risk assessments;
- Observations of activities in various departments where employees would likely perform risk assessments before performing activities (such as changing slicing from a meat with an allergen to a meat without an allergen);
- Records of mid shift cleaning while other processing operations continue (such as in a bakery, deli, or seafood shop, etc.).

2.4.3.2 Responsibility, Frequency and Methods of Hazard and Risk Management System

What the SQF Code says

2.4.3.2.1 Validation and verification activities shall be conducted.

2.4.3.2.2 The frequency and methods used to validate and verify food safety fundamentals, critical limits, and other food safety controls identified in food safety plans shall be documented and implemented and meet their intended purpose.

2.4.3.2.3 Records of all verification activities shall be maintained.

2.4.3.2 Implementation Guidance

What does it mean?

Definitions of validation and verification differ slightly from standard to standard. The GFSI Guidance Document version 7.0 defines validation as "an activity to obtain evidence that a requirement is controlled effectively" and verification as "a confirmation through the review of objective evidence that requirements

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have been fulfilled.” SQF uses the Codex definition. In other words, validation applies to scientific authentication that the critical limits set for each CCP will achieve the intended results (refer 2.4.3.3.1.). Verification applies to the entire SQF System and includes methods such as observing, record reviews, sampling, internal audit and re-validation to demonstrate that the SQF System is working and is effective.

What do I have to do?

The SQF practitioner is responsible for ensuring that all validation and verification activities are carried out. The SQF practitioner may utilize internal or external resources to conduct these activities, but takes responsibility for ensuring they are carried out.

Examples of verification activities shall include review of inspection records to ensure all monitoring tasks are completed at the frequency that is defined, ensuring that internal audits occur at the frequency defined, ensuring corrective and preventative actions are effectively implemented and product testing is performed at the right frequency.

Examples of validation shall include studies to prove the effectiveness of critical limits (such as the temperature actually controls the identified hazard like *salmonella species*). Examples could be reviewing product temperature on a scheduled thermal process (such as baking in the bakery), microbiological testing of product to ensure desired reduction of product for a finished product (such as selling cooked chicken at a deli).

The SQF practitioner is responsible for establishing a frequency schedule and methods for validating and verifying all parts of the retailer’s SQF System. An SQF consultant may be utilized by the facility to aid in verification activities, however ultimate responsibility for verification and validation must belong to the retailer management and the SQF practitioner.

Results of validation and verification activities shall provide input into the management review (2.1.5) and shall be used to upgrade the food safety management system (2.1.3).

2.4.3.2. Auditing Guidance

Validation and verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF Practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for validation and verification activities and is competent to organize, or supervise validation and verification activities;
- There are adequate competent resources available to carry out validation and verification activities;
- A validation and verification procedure has been prepared;
- The procedure indicates the frequency and methods used to validate and verify all applicable aspects of the SQF System including pre-requisite programs, control measures, critical limits and other aspects contained in the food safety plan;
- Personnel conducting validation activities understand their roles and responsibilities;
- The validation and verification procedures are effectively implemented;
- Records of all verification activities are current and accurate.

2.4.3.3 Validation and Effectiveness

What the SQF Code says

2.4.3.3.1. The methods, responsibility and criteria for ensuring the effectiveness of pre-requisite programs, and validating critical food safety limits to ensure they achieve their intended purpose shall be documented and implemented. The methods applied shall ensure that:

- i. Pre-requisite programs are confirmed to ensure they achieve the required result.
- ii. Critical limits are selected to achieve the designated level of control of the identified food safety hazard(s); and
- iii. All critical limits and control measures individually or in combination effectively provide the level of control required.

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- iv. Changes to the processes or procedures are assessed to ensure controls are still effective.
 - v. Critical food safety limits are re-validated at least annually.
- 2.4.3.3.2. Records of all validation activities shall be maintained.

2.4.3.3 Implementation Guidance

What does it mean?

Confirmation of the effectiveness of pre-requisite programs and validation of critical food safety is vital to ensuring that the programs and limits achieve their intended purpose, resulting in the production of safe food.

Validation involves testing over and above daily monitoring to ensure that established food safety procedures are effective, i.e. achieve the desired results, so that the retailer can have confidence that the product and process are safe. Validation methods will vary depending on the risk to finished product safety. For hazards assessed as high risk, the critical limits must be re-validated annually.

Critical food safety limits are said to be validated because they have been confirmed by scientific analysis. Pre-requisite programs and other food safety controls, however are confirmed by observation, inspection or audit to ensure that they are achieving the desired result.

What do I have to do?

The SQF practitioner is responsible for documenting and implementing the methods, responsibility and criteria for confirming the effectiveness of pre-requisite programs and validating critical food safety limits to ensure they achieve their intended purpose. The retailer must demonstrate how the validation methods ensure that the selected critical limits achieve the level of control required for the targeted food safety hazard. The retailer must also have documentation showing that the methods and control measures provide the level of control needed.

Some potential methods for confirming the effectiveness of specific pre-requisite programs are listed below. The implementation of these specific methods is not necessarily required, but confirmation of the effectiveness of the program is required. This is not an exhaustive list, but provides some examples:

- Personnel practices: Observe employees during the internal audit or daily operational inspection to ensure they are meeting the requirements of the retailer's program.
- Personnel processing practices: Observe employees during the internal audit or daily operational inspection to ensure they are meeting the requirements of the program.
- Training of personnel: Interview employees to ensure that job training has been effective and that key points are understood.
- Calibration of equipment: Engage an outside contractor to confirm that equipment is properly calibrated.
- Management of pests and vermin: Trend pest activity information to determine that the program is effective.
- Premises and equipment maintenance: Trend equipment breakdowns for signs of repeat problems.
- Cleaning and inspection: Perform environmental testing to ensure that microbiological loads are acceptable.

Water microbiology: Perform water testing to ensure that it meets potability standards.

Validation methods for CCP's must demonstrate that the hazard is adequately controlled. Possible validation for intervention steps used in the processing of product such as a "kill" step, may be one of the following:

- Scientific literature;
- Peer-reviewed published research;
- In-house or laboratory challenge studies;
- Reference to legally defined CCP's (Federal, State or local regulations)

If technology is being used in a manner that is different from that described within literature or research then the retailer must demonstrate how the revised manner of use conforms to the original claim of intervention.

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Validation is required for the critical limits identified for ALL CCPs.

All validation activities must be recorded to confirm and demonstrate they have been completed.

2.4.3.3 Auditing Guidance

Validation procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation activities and review of records at each facility audit. Evidence may include:

- Documentation of the methods and responsibility and criteria for ensuring the effectiveness of the pre-requisite programs;
- Implementation of the methods and responsibility and criteria for ensuring the effectiveness of the pre-requisite programs;
- Pre-requisite programs achieve their intended purpose;
- Critical food safety limits are validated annually or when changes to process occur;
- Methods used to validate critical limits ensure that the process step is safe if critical limits are met;
- Critical limits effectively provide the designated level of control;
- Personnel conducting validation activities understand their roles and responsibilities;
- Records of all verification activities are current and accurate.

2.4.3.4 Verification Schedule

What the SQF Code says

2.4.3.4.1 A verification schedule outlining the verification activities, their frequency of completion and the person responsible for each activity shall be prepared and implemented.

2.4.3.4 Implementation Guidance

What does it mean?

A verification schedule is simple enough to create, but sometimes difficult to implement. The SQF practitioner is responsible for all verification activities, but is not necessarily the one to conduct those activities. The practitioner must set the schedule to ensure all required verification activities are conducted and the set frequency of these activities. The practitioner must also ensure that resources are available and suitably competent to conduct these activities.

What do I have to do?

Elements 2.4.3.2. and 2.4.3.4. require the retailer to define their validation and verification activities. This element simply requires the retailer (i.e., the SQF practitioner) to further identify when those activities will occur and who is responsible.

The retailer must have a verification schedule that:

- describes SQF System verification activities;
- outlines the frequency of verification;
- designates the person responsible for each verification activity; and
- provides for a log of verification activity.

2.4.6 Auditing Guidance

The verification schedule shall be reviewed initially at the desk audit and compliance to the schedule by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- Review of the verification schedule including identification of those responsible for verification activities;
- Interview with those designated as responsible for verification activities;

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- Designated personnel are trained and competent to conduct verification activities;
- Verification activities conducted as per schedule.

2.4.3.5 Verification of Monitoring Activities

What the SQF Code says

2.4.3.5.1 The methods, responsibility and criteria for verifying the effectiveness of monitoring pre-requisite programs, critical control points and other food safety controls identified shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record verified.

2.4.3.5.2 Records of the verification of monitoring activities shall be maintained.

2.4.3.5 Implementation Guidance

What does it mean?

Monitoring is the regular observation, testing, or measurement of critical limits to ensure the process remains safe. The HACCP plan must identify for each CCP, what is to be measured, who (i.e., which position) is responsible for observation/testing/measuring; when observation/testing/measuring is to be carried out (e.g., every hour, once per shift), and how the observation/testing/measuring is to be carried out. Monitoring applies to each CCP and must be supported by work instructions, and training of operators designated to carry out monitoring.

Monitoring records must be checked for accuracy and timeliness by someone in a position of authority. In some special cases, e.g. thermal processing such as cooking chicken in a deli, the person verifying the records may need to be an approved, qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring.

Similarly, other control measures that must be monitored (e.g., temperatures of incoming goods) must also be checked for accuracy.

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of pre-requisite and critical control points.

Examples of verification of monitoring include a review of temperature records to ensure that all monitoring activity tasks are completed and temperatures recorded are within critical limits. Other monitoring activities could include weight records, product testing records, cook temperature records and in-process food safety checks.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.5. Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying monitoring activities, including pre-requisite programs, critical limits, and other food safety controls;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.

2.4.3.6 Method of Monitoring and Verifying Temperature of Cold Handling Food for Safety Activities

What the SQF Code says

2.4.3.6.1 Organization shall have a method in place for sites to monitor and verify cold holding temperatures of foods for safety. Records of monitoring and verification of monitoring activities shall be maintained.

2.4.3.6 Implementation Guidance

What does it mean?

For this element, monitoring is the regular observation or measurement of cold holding limits to ensure the process remains safe. The method must identify for each cold holding process, what is to be measured, who (i.e., which position) is responsible for observation/measuring; when observation/measuring is to be carried out (e.g., every hour, once per shift), and how the observation/measuring is to be carried out. Monitoring applies to each cold hold process in the facility and must be supported by work instructions, and training of operators designated to carry out the cold holding monitoring.

Monitoring records must be checked for accuracy and timeliness by someone in a position of authority and be a qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring for cold holding monitoring.

All cold holding thermometers must also be checked for accuracy and calibrated when required (following manufacturers recommendations).

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of cold holding processes.

Examples of verification of monitoring include a review of temperature records to ensure that all monitoring activity tasks are completed and temperatures recorded are within critical limits.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.6 Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for cold holding monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying cold holding monitoring activities;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.

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2.4.3.7 Method of Monitoring and Verifying Temperature of Cooking Food for Safety Activities

What the SQF Code says

2.4.3.7.1 Organization shall have a method in place for sites to monitor and verify cooking temperatures of foods for safety. Records of monitoring and verification of monitoring activities shall be maintained.

2.4.3.7 Implementation Guidance

What does it mean?

For this element, monitoring is the regular observation or measurement of cooking temperature limits to ensure the process remains safe. The method must identify for each cooking process, what is to be measured, who (i.e., which position) is responsible for observation/measuring; when observation/measuring is to be carried out (e.g., every hour, once per shift), and how the observation/measuring is to be carried out. Monitoring applies to each cooking process in the facility and must be supported by work instructions, and training of operators designated to carry out the cooking temperature monitoring.

Monitoring records must be checked for accuracy and timeliness by someone in a position of authority and be a qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring for cooking process monitoring.

All thermometers used to monitor and verify cooking temperatures must also be checked for accuracy and calibrated when required (following manufacturers recommendations).

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of cooking temperatures for every cooking process.

Examples of verification of monitoring include a review of temperature records to ensure that all monitoring activity tasks are completed and temperatures recorded are within critical limits.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.7 Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for cooking monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying cooking monitoring activities;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.
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2.4.3.8 Method of Monitoring and Verifying Temperature of Hot Holding Food for Safety Activities

What the SQF Code says

2.4.3.8.1 Organization shall have a method in place for sites to monitor and verify hot holding temperatures of foods for safety. Records of monitoring and verification of monitoring activities shall be maintained.

2.4.3.8 Implementation Guidance

What does it mean?

For this element, monitoring is the regular observation or measurement of hot holding temperature limits to ensure the process remains safe. The method must identify for each hot holding process, what is to be measured, who (i.e., which position) is responsible for observation/measuring; when observation/measuring is to be carried out (e.g., every hour, once per shift), and how the observation/measuring is to be carried out. Monitoring applies to each hot holding process in the facility and must be supported by work instructions, and training of operators designated to carry out the hot holding temperature monitoring.

Monitoring records must be checked for accuracy and timeliness by someone in a position of authority and be a qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring for hot holding process monitoring.

All thermometers used to monitor and verify hot holding temperatures must also be checked for accuracy and calibrated when required (following manufacturers recommendations).

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of hot holding temperatures for every hot holding process.

Examples of verification of monitoring include a review of temperature records to ensure that all monitoring activity tasks are completed and temperatures recorded are within critical limits.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.8 Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for hot holding monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying hot holding monitoring activities;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.

2.4.3.9 Method of Monitoring and Verifying Temperature of Cooling Food for Safety Activities

What the SQF Code says

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2.4.3.9.1 Organization shall have a method in place for sites to monitor and verify cooling temperatures of foods for safety. Records of monitoring and verification of monitoring activities shall be maintained.

2.4.3.9 Implementation Guidance

What does it mean?

For this element, monitoring is the regular observation or measurement of cooling temperature limits to ensure the process remains safe. The method must identify for each cooling process, what is to be measured, who (i.e., which position) is responsible for observation/measuring; when observation/measuring is to be carried out (e.g., every hour, once per shift), and how the observation/measuring is to be carried out. Monitoring applies to each cooling process in the facility and must be supported by work instructions, and training of operators designated to carry out the cooling temperature monitoring.

Monitoring records must be checked for accuracy and timeliness by someone in a position of authority and be a qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring for cooling process monitoring.

All thermometers used to monitor and verify cooling temperatures must also be checked for accuracy and calibrated when required (following manufacturers recommendations).

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of cooling temperatures for every cooling process.

Examples of verification of monitoring include a review of temperature records to ensure that all monitoring activity tasks are completed and temperatures recorded are within critical limits.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.9 Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for cooling monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying cooling monitoring activities;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.

2.4.3.10 Method of Monitoring and Verifying pH of Food for Safety Activities

What the SQF Code says

2.4.3.10.1 Organization shall have a method in place for sites to monitor and verify pH of foods for safety. Records of monitoring and verification of monitoring activities shall be maintained.

2.4.3.10 Implementation Guidance

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What does it mean?

For this element, monitoring is the regular measurement of pH limits to ensure the process remains safe. The method must identify for each process requiring pH for food safety, what is to be measured (pH), who (i.e., which position) is responsible for measuring; when measuring is to be carried out (e.g., every hour, once per shift), and how the measuring is to be carried out. Monitoring applies to each pH control process in the facility and must be supported by work instructions, and training of operators designated to carry out the pH monitoring.

Monitoring records must be checked for accuracy and timeliness by someone in a position of authority and be a qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring for pH control.

All pH meters used to monitor and verify pH must also be checked for accuracy and calibrated when required (following manufacturers recommendations).

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of pH for every process requiring pH control for food safety.

Examples of verification of monitoring include a review of pH records to ensure that all monitoring activity tasks are properly completed and pH data recorded are within critical limits.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.10 Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for pH monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying pH monitoring activities to include accuracy checks and calibration as required;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.

2.4.3.11 Method of Monitoring and Verifying Salinity of Food for Safety Activities

What the SQF Code says

2.4.3.11.1 Organization shall have a method in place for sites to monitor and verify salinity of foods for safety. Records of monitoring and verification of monitoring activities shall be maintained.

2.4.3.11 Implementation Guidance

What does it mean?

For this element, monitoring is the regular measurement of salinity limits to ensure the process remains safe where salt is a control for food safety. The method must identify for each process requiring salinity for food safety, what is to be measured (salinity), who (i.e., which position) is responsible for measuring; when measuring is to be carried out (e.g., every hour, once per shift), and how the measuring is to be carried out.

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Monitoring applies to each salinity control process in the facility and must be supported by work instructions, and training of operators designated to carry out the salinity monitoring.

Monitoring records must be checked for accuracy and timeliness by someone in a position of authority and be a qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring for salinity control.

All salinity meters used to monitor and verify salinity must also be checked for accuracy and calibrated when required (following manufacturers recommendations).

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of salinity for every process requiring salinity control for food safety.

Examples of verification of monitoring include a review of salinity records to ensure that all monitoring activity tasks are properly completed and salinity data recorded are within critical limits.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.11 Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for salinity monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying salinity monitoring activities to include accuracy checks and calibration as required;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.

2.4.3.12 Method of Monitoring and Verifying On-site grinding of Raw meats, Poultry and/or Seafood for Safety Activities

What the SQF Code says

2.4.3.12.1 Organization shall have a method in place for sites to monitor and verify on-site grinding of meats, poultry and/or seafood for safety activities. Records of monitoring and verification of monitoring activities shall be maintained.

2.4.3.12 Implementation Guidance

What does it mean?

For this element, monitoring is the regular measurement of onsite grinding of meats, poultry or seafood limits to ensure the process remains safe where grinding is a process that needs controlling for food safety. The method must identify for each process requiring grinding and the effective controls for food safety, what is to be measured or observed (hazards from grinding), who (i.e., which position) is responsible for measuring or observing; when measuring or observing is to be carried out (e.g., continuous, every hour, once per shift), and how the measuring (such as metal detector or x-ray unit) or observing is to be carried out. Monitoring applies to each control for each grinding process in the facility and must be supported by work instructions, and training of operators designated to carry out the grinding control monitoring.

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Monitoring records must be checked for accuracy and timeliness by someone in a position of authority and be a qualified person. The SQF Practitioner must ensure this person is qualified to perform the monitoring for the grinding control.

Any equipment used to monitor and verify grinding controls (such as metal detectors) must also be checked for accuracy and calibrated when required (following manufacturers recommendations).

What do I have to do?

The retailer must document the methods, responsibilities and criteria employed to verify the effectiveness of monitoring of grinding controls for every process requiring grinding control for food safety.

Examples of verification of monitoring include a review of grinding control records to ensure that all monitoring activity tasks are properly completed and grinding control data recorded are within critical limits.

Electronic records can be used for monitoring activities. Retailers must be able to demonstrate how records are reviewed for verification purposes. Each record must have secure access or a unique electronic signature so that it can be verified that records were recorded by individual as assigned.

2.4.3.12 Auditing Guidance

The verification procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for validation and verification activities and review of records at each facility audit. Evidence may include:

- The SQF practitioner understands the need for verification activities and is competent to carry out, or supervise verification activities;
- A procedure is documented to verify methods and responsibilities for grinding control monitoring activities;
- The procedure adequately details the methods and responsibilities for verifying grinding control monitoring activities to include accuracy checks and calibration as required;
- Personnel conducting verification of monitoring activities understand their roles and responsibilities;
- The procedures for verification of monitoring activities are effectively implemented;
- Records of all verification activities are current and accurate.

2.5 SQF System Verification

2.5.1 Internal Audit (Mandatory)

What the SQF Code says

2.5.1.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System including facility and equipment inspections, pre-requisite programs, food safety plans and legislative controls shall be documented and implemented. The methods applied shall ensure:

- i. An internal audit schedule is prepared detailing the scope and frequency of internal audits with a minimum frequency of one hundred (100) percent of store(s) audited annually;
- ii. In-store vendors of food production services must be included in the internal audit program;
- iii. Corrections and corrective actions of deficiencies identified during the internal audits are undertaken;
- iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions; and
- v. Records of internal audits and any corrections and corrective actions taken as a result of internal audits shall be maintained.

2.5.1.2 Personnel conducting internal audits shall be trained in internal audit procedures.

2.5.1.3 Where possible, personnel conducting internal Audits shall be independent of the function being audited. A 3rd party may be used to conduct an organization's internal audit program.

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2.5.1 Implementation Guidance

What does it mean?

Internal audits are an in-house check to identify gaps or deficiencies in the SQF System and provide a sound basis for deciding on measures for improvement. Internal auditing is a verification method and when used properly, can reduce the uncertainty and risk of external audits. It can also let senior management know how the organization is moving on the SQF journey and to develop a good food safety working culture.

This element requires the retailer to audit the activities in their System on a regular basis to ensure that everything is running smoothly. Internal audits help the supplier to identify faults in their System so that it can be improved.

What do I have to do?

This element is mandatory.

The retailer is required to prepare an internal audit procedure describing how internal audits of the entire SQF System are conducted and identify who is responsible for scheduling and conducting internal audits. The internal audits must cover the entire SQF System, including the application of pre-requisite programs and the HACCP Food Safety Plan and critical food safety controls that have been implemented. The retailer must also confirm that legislative requirements are met, that inspections and tests are being conducted as required and that the premises, its surrounds and equipment are being maintained sanitarily and in good condition.

The audit program must include:

- An audit schedule (i.e., when audits will be conducted);
- Audit criteria (i.e., the area and requirements assessed);
- Responsibility (i.e., who will conduct the audit);
- Corrections and corrective actions and root cause analysis as appropriate (i.e., the response to the audit);
- Also, a review of the trace back system as outlined in 2.6.2.

There must be at least one complete SQF System internal audit per year. Preferably this is conducted throughout the year or the season, depending on the length of the season within the facility. Major physical or program non-conformities shall require a more effective internal audit program.

For internal audits to be effective, staff conducting internal audits must be trained in internal auditing techniques, information gathering and objective observation. This training need not be “formal” training provided by an external source. Internal auditor training covers internal audit procedures, including the planning and scheduling of internal audits, preparing internal audit reports and initiating and following up on audit findings. Internal audits should combine several information gathering techniques, including interview of personnel, review of records and observation of current conditions.

To ensure the objectiveness of the internal audit the retailer is required, where possible to use personnel who are separate from the area being audited to conduct internal audits. The inclusion of the words “where possible” illustrates that in the case of some very small retailers this may not be possible. In such cases, the retailer is required to demonstrate that the alternative internal audit arrangement meets the objective of this requirement and is communicated to all affected parties.

Finally, the outcomes of all internal audits, including any corrective actions taken, must be recorded. Any audit tool that is developed by the retailer can be utilized to perform the internal audits provided it covers the required areas and programs.

2.5.1 Auditing Guidance

The internal audit procedure and schedule shall be reviewed initially at the desk audit and compliance to this requirement through observation and interviews with staff conducting internal audits and review of records at each facility audit. The SQF auditor will verify that the audit schedule is adequate based on the observations from the assessment of the facility. Evidence may include:

- There is an internal audit procedure and schedule that adequately covers all SQF System elements;
- Sufficient resources are allocated to conduct internal audits as per schedule;
- Staff conducting internal audits are adequately trained;

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- Staff conducting internal audits are independent of the area being audited;
- Root causes are identified and appropriate corrections and corrective actions of identified deficiencies are correctly allocated, followed up, and completed (refer 2.5.2);
- Internal audit results are communicated to relevant management and staff;
- Internal audit reports and their follow-up are reviewed as part of the management review process (refer 2.1.5.);
- Records are kept of internal audits and the corresponding corrective actions.

2.5.2 Corrective Action (Mandatory)

What the SQF Code says

2.5.2.1 The responsibility and methods outlining how corrections and corrective actions are determined, implemented and verified in the event of any significant non conformity relating to food safety shall be documented and implemented, including the identification of a root cause and resolution of non-compliance of critical food safety limits, and deviations from food safety requirements. Records of all investigation and resolution of corrections and corrective action shall be maintained.

2.5.2 Implementation Guidance

What does it mean?

Corrective action is an important part of any management system. Corrective actions are proactive, rather than reactive responses to a deviation from regular operations. It requires the development a procedure that describes, before the event, who, what, when, where and how the retailer will address an identified problem or deviation. Identifying a means to address a problem prior to its occurrence requires the retailer to consider immediate action to resolve the problem and deal with any affected product, and preventative action to prevent a recurrence of the problem.

What do I have to do?

This element is mandatory.

When problems or issues that involve food safety arise, the retailer is required to take corrective and preventive action to deal with any affected product (s) and to fix the process(es). The retailer must document a procedure describing the responsibility for investigating and identifying the causes of problems, including a breakdown of critical limits relating to critical food safety. Further, the retailer must document how these problems are to be resolved if and when they occur, the methods used to correct and control the situation and what action is to be taken to prevent the recurrence of the problem.

Corrections are considered a short-term fix, i.e. a quick action taken to remediate a specific problem and make adjustments to regain immediate control. A corrective action is a long-term fix designed to identify the root cause of the problem and to take actions that will prevent recurrence. This process is designed to minimize the risk that the situation will occur again.

When monitoring activities show that critical limits have been exceeded, the retailer's corrective actions must describe what happens to the affected product (s) (i.e., the product processed or handled since the last good result), as well as the preventative action to correct the process. These corrective actions are proactive – they are described in the HACCP plan before the event.

Corrections should be made when there is any observation within a facility that leads one to believe that product food safety is at risk. After the correction is made, the retailer must investigate to determine the root cause of the issue. When the root cause of the problem is identified, corrective actions can be taken.

Corrective actions associated with deviations from critical limits for CCPs must be documented on the HACCP plans (FSP). This shall describe responsibilities and actions required to deal with or dispose of affected product (e.g., back to the last good check) and actions necessary to correct the process. However, the retailer must also prepare a corrective action procedure (and log) to ensure corrections and corrective actions are documented, assigned, followed up, and confirmed.

This type of preventive action helps to assure the continuous improvement of the System, resulting in fewer future problems since the root causes have been addressed. Corrective actions shall also be reviewed as part of the management review process (refer 2.1.4.1 iii).

The retailer is also required to maintain records of corrections and corrective action taken.

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Essentially, the retailer is asked to outline and demonstrate how they will manage corrective action, identify who is responsible for managing it and describe what methods are used to resolve any safety or quality issues.

2.5.2 Auditing Guidance

The HACCP plans (i.e., the FSP) and corrective action procedure shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview with the SQF practitioner, interviews with other relevant staff responsible for carrying out corrective actions and review of corrective action records at each facility audit. Evidence may include:

- Responsibilities and methods outlining how corrections and corrective actions are investigated/resolved/managed/controlled are documented;
- Responsibilities and methods outlining how corrections and corrective actions are investigated/resolved/managed/controlled/implemented;
- Root cause analyses have been carried out for non-compliance to critical food safety limits;
- Corrective actions have correctly dealt with affected product;
- Corrective actions have achieved resolutions that will prevent recurrence of process issues;
- Personnel carrying out corrective actions understand their roles and responsibilities;
- Records of corrective actions are current and accurate.

2.5.3 Control of Measuring and Monitoring Devices (Mandatory)

What the SQF Code says

2.5.3.1 The methods and responsibility for the calibration and re-calibration of measuring, test and inspection of equipment used for monitoring activities outlined in pre-requisite program, food safety plans and other process controls, shall be documented and implemented. Evidence of appropriate calibration shall be determined.

2.5.3.2 Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, test and inspection equipment be found to be out of calibration state.

2.5.3.3 Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment.

2.5.3.4 Equipment shall be calibrated against national or international reference standards and methods or to accuracy appropriate to its use. In cases where standards are not available, the organization shall provide evidence to support the calibration reference method applied.

2.5.3.5 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommendations.

2.5.3 Implementation Guidance

What does it mean?

The accuracy of measuring, and inspection equipment that is used to test food safety parameters (e.g., temperature, pH, product weight) is essential in ensuring that product meets regulatory, legal and internal requirements. The equipment itself must itself be tested to ensure correct information is provided to make operational decisions.

What do I have to do?

Test equipment used to confirm regulatory requirements (e.g., weight scales) must be calibrated against a national or international standard. In cases where a national or international standard does not exist or is not arranged, a reference standard can be purchased or created and/or a standard method (often supplied by the equipment supplier) used.

- pH meters are calibrated against reference buffer solutions according to the manufacturer instructions.
- Thermometers can be calibrated against boiling water or ice-water if these approximate the temperatures the thermometer is required to measure when in use.

To ensure that measuring equipment gives reliable results, the supplier must:

- Identify all the equipment that requires calibration (e.g., thermometers, scales, pH meters, etc.).

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- Ensure the equipment, once calibrated, is protected so that measurements remain accurate.
- Ensure the equipment is only operated by authorized personnel and using approved methods.
- Determine how accurate the measurements need to be. Does the retailer need to comply with industry or national standards? If the calibration is designed to check measurements implemented to improve a process the retailer may determine the level of measurement required and apply calibration parameters to ensure consistent measurement.
- Calibrate equipment regularly. The calibration frequency will vary depending upon the type of equipment and its usage. Calibration frequency must be adjusted in light of experience or manufacturer's instructions.
- Develop a procedure to address products produced or handled between the time equipment "out-of-calibration" is discovered and the last calibration check with normal tolerances recorded.
- Clearly identify who is responsible for undertaking calibration, recording the results of all calibrations and labeling equipment to indicate when it was last calibrated and when recalibration is due.

2.5.3 Auditing Guidance

Calibration procedures shall be reviewed at the initial desk audit. Subsequently, compliance to this requirement and the retailer calibration procedures shall be reviewed at each facility audit through observation, review of records and interviews with operational staff responsible for calibration. Evidence may include:

- All measuring, test and inspection equipment is identified;
- Calibration standards are known and followed;
- Calibration methods and frequency are documented for all available measuring, test, and inspection equipment;
- Calibration methods and frequency meet national or international standards where appropriate;
- Calibration methods and frequency meet internal requirements where appropriate;
- Calibration methods and frequency meet manufacturer's instructions where appropriate;
- Methods for calibration of equipment include responsibility for conducting calibration;
- Authorized and qualified personnel understand the methods for conducting calibration;
- There are procedures in place to address disposition of potentially affected product;
- Potentially affected product has appropriate disposition;
- Calibrated equipment is protected from damage;
- Calibrated equipment is not subject to unauthorized adjustment;
- Calibration records are available and complete.

2.6 Product Identification, Trace, Serious Incident Management

2.6.1 Product Information (Mandatory)

2.6.1.1 Product Identification

What the SQF Code says

2.6.1.1.1 The methods and responsibility for identifying products during all stages of production, storage and offering for sale shall be documented and implemented. The product identification system shall be implemented to ensure:

- i. Raw materials, work in progress and finished product (in-store produced and pre-packaged products) are clearly identified during all stages of receipt, production, storage, offering for sale and delivery; and

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- ii. Finished product is labeled to regulatory requirements.
- iii. Product identification records shall be maintained.

2.6.1.1 Implementation Guidance

What does it mean?

To allow for effective trace back (refer 2.6.2), recall (refer 2.6.3.2.) and stock control and rotation (refer 15.4.4.), materials and products at all stages of production must be labelled and identified. How the retailer goes about this is entirely their own choice, as long as product can be identified and tracked at every stage of production.

What do I have to do?

This element is mandatory.

The retailer must be able to clearly identify product upon receipt, throughout the process and when it is a finished product.

Product that is in-process may be identified in a variety of ways. The facility could use bin tags, pallet tags, specific product colors, product tags, etc. The facility must be able to demonstrate how the product identification system works for incoming materials, work-in-progress and for finished product.

The finished product label needs to contain information that accurately describes the product in accordance to the specification and/or regulatory requirements in the country of origin and intended country of destination.

The retailer is required to prepare a procedure outlining who is responsible for maintaining the product identification system and include in the procedure the methods used to identify product.

When shipping finished product, the retailer must ensure the product is clearly identified and that all product identification details are accurately described on dispatch documents or otherwise included with a shipment once it leaves the business.

2.6.1.1 Auditing Guidance

The product identification procedure shall be reviewed initially at the desk audit and compliance to this requirement by observation, and interviews with operational staff, and review of records at each facility audit. The facility should expect that the auditor will select product at various stages during the process and ask for the origin of product, raw material supplier, etc. to test the identification system. Evidence may include:

- There is a documented product identification system in place;
- The product identification system is effectively implemented;
- Product is clearly identified during all stages of the process;
- Finished product is labeled to customer requirements;
- Finished product is labeled to regulatory requirements in the country of origin and country of destination;
- All operational staff understands and uses the product identification system.

2.6.2 Product Trace (Mandatory)

What the SQF Code says

2.6.2.1 The responsibility and methods used to trace product shall be documented and implemented to ensure:

- i. Finished in-store prepared product and pre-packaged product is traceable to the customer and consumer when known (one stage forward) and provides traceability through the process to the supplier, agent, broker and vendor and date of receipt of products, raw materials, food contact packaging and materials and other inputs (one stage back);
- ii. Traceability is maintained where product is reworked; and
- iii. The effectiveness of the product trace system shall be tested at least annually.

2.6.2.2 Records of raw and packaging material receipt and use, and product sold to customer and/or consumer shall be maintained.

2.6.2 Implementation Guidance

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What does it mean?

The ability to identify and trace product is an important aspect of any food business. Food regulators, retailers, insurance companies and food manufacturers require that product be traceable. The retailer must document the method used to trace product, ensuring that it provides a link to all raw or ingredient inputs used. Raw materials, ingredients and other inputs shall be traceable through the process to the finished product. Records of product dispatch and destination (where appropriate) shall be maintained. If product has been dispatched from the retailer facility (such as to another store); the documentation must assign responsibility for product dispatch and include the product name, when it was dispatched (sold to or moved to another store or facility), who was the customer (not including direct sales to consumers), the quantity and the production batch dates and specific details.

What do I have to do?

This is a mandatory element.

The retailer must have a process in place that enables them to trace product back to the material supplier (one back) and if applicable, to another facility. A written procedure must be documented to show how this is accomplished. The product trace system must account for raw materials, ingredients, packaging materials and processing aids used that may impact on food safety.

For the purpose of this section and if applicable, the retailer's first customer is the first location where the product is delivered after it leaves direct control. This can be back to a distribution center, another retail location, food bank, etc. It is the requirement of the facility to be able to trace to where they have sent the product to and not beyond that location.

For the purpose of the SQF Code, traceability is a "one up, one back" requirement. The retailer's procedure must include details of how all raw materials, ingredients, packaging materials and processing aids are linked through to the finished product; and must outline how the retailer accounts for the reuse of reworked product. The product trace procedure must outline how the retailer traces product and who is responsible for implementing and maintaining the product trace system.

The retailer must test the effectiveness of the trace system at least annually. The auditor will request to see records of the trace test and any corrective actions taken as a result of this review.

The retailer is required to retain records of all product receipt and any product dispatched or shipped to another location. Both the details of the product and where and to whom it was dispatched must be recorded.

Identifying (refer 2.6.1) and tracing bulk materials can be problematic if there are insufficient bulk bins to store separate deliveries. Where bins/silos are continually refilled, delivery batches must still be recorded and the proportion of each delivery identified when materials are used from bulk. The processed material must, as far as possible, be linked with deliveries of raw materials.

2.6.2 Auditing Guidance

The product trace procedure shall be reviewed initially at the desk audit and compliance to this requirement by observation, interviews with operational staff, and review of records at each facility audit. The facility audit shall include a review of trace back on rework (where applicable) and the auditor may need to verify traceability requirements. Evidence may include:

- There is a product trace procedure that documents all applicable materials, work-in-progress, and finished products;
- The product trace system is effectively implemented;
- The product trace system is one up, one back;
- Finished product can be traced back to material suppliers;
- Rework is traceable back to materials and work-in-progress;
- The product trace system has been tested annually.

2.6.3 Serious Incident Management

2.6.3.1 Crisis Communication Plan

What the SQF Code says

2.6.3.1.1 A crisis communication plan based on the understanding of known food safety threats to a business shall be prepared by senior management outlining the methods and responsibility the organization will implement to cope with a business crisis that may have an impact on the ability of the organization to provide safe food.

2.6.3.1.2 The business continuity plan shall include as a minimum:

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- i. A senior manager responsible for decision making, oversight and initiating actions arising from a crisis management incident;
 - ii. The selection and training of a crisis management team;
 - iii. The controls implemented to ensure a response does not compromise product safety;
 - iv. The measures to isolate and identify product affected by a response to a crisis;
 - v. The measures taken to verify the acceptability of food prior to release for sale;
 - vi. The preparation and maintenance of a current crisis alert contact list;
 - vii. Sources of legal and expert advice; and
 - viii. The responsibility for internal communications and communicating with authorities, external organizations, customer, consumer and media.
- 2.6.3.1.3 The crisis communication plan shall be reviewed, tested and verified at least annually.
- 2.6.3.1.4 Records of reviews and verification of the crisis communication plan shall be maintained.

2.6.3.1 Implementation Guidance

What does it mean?

A “business continuity plan” is often confused with a “product withdrawal and recall plan” (2.6.3.2.). They are two separate functions and programs. A business continuity plan is a crisis management plan that prescribes actions that will be taken as a result of external, environmental, climatic, equipment failure or other potential business threats that will impact the ability of the retailer to provide their customers with safe, quality products. These threats, depending upon the retailer’s product, location and other factors may include fire, flood, power failure, storm damage, acts of terrorism, etc.

A recall plan however prescribes actions to be taken when sub-standard product, i.e. product that deviates from established safety limits, is distributed and has to be recovered from the market (refer 2.6.3.2.). For some smaller retailers, the business continuity team and recall team may be one and the same. For larger retailers, they may differ.

It is expected that all SQF retailers have considered the potential threats to their business and the controls necessary to ensure continuous, safe, quality food supply.

What do I have to do?

The retailer is required to identify a crisis management team including a senior decision maker and ensure the team is trained in crisis management procedures. The team shall identify known threats to the business which could disrupt or impact its ability to provide safe, quality food and prepare a plan describing the methods and controls the retailer will implement to address these threats if they were to occur and how to maintain continuity of product supply during the crisis.

The plan must document in detail the controls the retailer will implement to assure that food safety is not compromised and that if the integrity of any product is compromised, how the product will be isolated and controlled. The plan should ensure that everyone on the crisis management team is familiar with the withdrawal and recall procedures the retailer has documented under 2.6.3.1.

The plan needs to include criteria for when controls will be implemented (e.g., numbers of hours with no power, rise in product temperature prior to moving to alternative storage locations, etc.) and how criteria will be monitored during the business threat condition. Criteria are to be product specific, as appropriate.

Also included are product review and disposition criteria to determine what product is recoverable, what is salvageable and what is to be destroyed. Methods for recovery, salvage, and destruction shall be described within plan.

Communication during a crisis is important. Methods for communication with regulatory, consumers, stakeholders and news media must be described and the individual (s) who is/are responsible for communication (s) must be identified.

The business continuity plan shall include a crisis alert contact list, sources of legal and practitioner assistance which may counsel senior management in a crisis situation and designation of responsibilities for internal and external communication during a crisis.

The business continuity plan shall be reviewed at least annually. All elements of the plan need to be tested. This could include a mock press release, mock incident, requirement to contact external storage locations, etc. The key provision is to have a mock crisis identified, product identified, criteria for monitoring of affected product, actions that would be taken based on results from monitoring, and final disposition of

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identified product. If a mock communication is created, it is not recommended to contact consumers for fear of confusion.

Records of this review are required.

2.6.3.1 Auditing Guidance

The crisis communication plan and business continuity plan shall be reviewed during the desk audit and the implementation of the plan, and its annual review (including follow-up and corrective actions) checked as part of the facility audit by interview, observation and review of records. Evidence may include:

- A crisis management team has been established, trained and includes a senior decision maker;
- A business continuity plan is in place and has been tested at least annually;
- The business continuity plan includes known business threats, controls that need to be implemented, measures to isolate affected product and a contact list of relevant authorities, legal advice and other key stakeholders;
- The business continuity plan includes identification of the individual (s) responsible for communication, including communication within the facility;
- Where the annual review of the business continuity plan has identified non-compliances or areas requiring improvements, corrective actions (refer 2.5.2) have been identified and implemented;
- Records of business continuity plan reviews and their corrective actions are available.

2.6.3.2 Product Withdrawal and Recall (Mandatory)

What the SQF Code says

2.6.3.2.1 The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall:

- i. Identify those responsible for initiating, managing and investigating a product withdrawal or recall;
- ii. Describe the management procedures to be implemented including sources of legal and expert advice; and
- iii. Outline a communication plan to inform customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident.
- iv. SQFI and the certification body shall be listed as an essential body and notified in instances of a food safety incident of a public nature, or product recall for any on-site produced products.

2.6.3.2.2 An Investigation shall be undertaken to determine the root cause of an on-site produced product withdrawal or recall and details of investigations and any action taken shall be documented.

2.6.3.2.3 The product withdrawal and recall system shall be reviewed, tested and verified as effective at least annually.

2.6.3.2.4 Records of all product withdrawals, recalls and mock recalls shall be maintained.

2.6.3.2.5 SQFI and the certification body shall be notified in writing within 24 hours upon identification of a food safety event that requires public notification of on-site produced food products (e.g. receipt of a regulatory warning letter).

2.6.3.2 Implementation Guidance

What does it mean?

A product recall applies when a product is found to be unsafe or otherwise in breach of regulatory requirements and is withdrawn from public sale and the consumer market is advised not to use or consume that product. Recalls may be mandatory (i.e., initiated by a regulator), retailer driven, or voluntary (i.e., initiated by a supplier).

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A product withdrawal applies when a dispatched product is found not to meet safety or quality requirements, is deemed not suitable for sale and is withdrawn from the distribution chain before it has reached the consumer.

A product recall and withdrawal procedure must be prepared, implemented and regularly reviewed to ensure everyone involved in the recall process understands their role and their responsibility in the event of a recall or withdrawal.

What do I have to do?

This is a mandatory element.

The retailer must have a management committee in place to coordinate and manage recalls and must prepare a withdrawal and recall procedure describing the methods, responsibilities and procedures they implement in the event of a product withdrawal or recall. There must be senior management involvement in the recall committee, as well as departmental and division managers with the authority to make decisions.

The procedure may contain a description of incidents specific to the retailer's product that may trigger a withdrawal or recall and must include an up-to-date list of suppliers, regulators, media outlets and other essential contacts that need to be notified in the event of a withdrawal or recall.

The SQFI and the retailer's certification body (CB) must be included on the communication list. The retailer is required to notify the CB and SQFI in writing within 24 hours of a food safety incident of a public nature (i.e. requiring public notification) or a product recall for any reason. The SQFI contact is foodsafetycrisis@sqfi.com.

The written procedure must also outline the methods the retailer will implement to investigate the cause of a withdrawal or recall (refer 2.6.3.2). The retailer shall review and test their withdrawal and recall procedure at least annually and verify that the instructions continue to be relevant, that it is effective and efficient and that everyone understands their role.

Records of any/all recalls and withdrawals must be maintained, along with the results of testing of the withdrawal and recall procedure. Records for testing must include all supporting documentation used to identify product included within the recall/withdrawal. These records may include production records, raw materials or ingredient receiving records, rework records, product holds, and product storage and distribution records. The retailer should test product to show that full distribution (if product is shipped out or moved to another facility such as another store or to the food bank) traceability can be verified.

Non-conformances identified during the exercise must be investigated by the facility and required corrective action completed, with a follow up test completed to ensure that corrective actions are effective. A recall and withdrawal exercise should be able to demonstrate linkage of raw materials and ingredients through the process to the finished saleable product. This review of the system is therefore, also a review of the trace back system as outlined in 2.6.2.1.

Recall targets may require 100% identification and quarantine of affected product within hours or recall notification. Regulatory recall requirements must also be considered.

2.6.3.2 Auditing Guidance

The recall and withdrawal procedure shall be reviewed initially at the desk audit and compliance to this requirement by observation, interviews with recall committee, and review of actual/mock recall records at each facility audit. The SQF auditor shall review the annual test of the recall and withdrawal system, and corrective actions taken as a result of the test.

Evidence may include:

- A recall committee is established and all members understand their roles and responsibility;
- The methods and responsibilities for notifying customers, SQFI, the certification body, regulators and other essential bodies are identified;
- The recall/withdrawal system has been tested annually;
- The recall/withdrawal system meets regulatory and customer requirements;
- Communication has been tested during an actual or test recall;
- Investigations into the cause of actual recalls/withdrawals have been conducted;
- Corrective actions have been taken on identified deficiencies in the recall/withdrawal.

2.7 Food Defense

2.7.1 Food Defense (Mandatory)

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What the SQF Code says

2.7.1.1 The methods, responsibility and criteria for preventing food adulteration caused by a deliberate act of sabotage shall be documented, implemented and maintained. The plan shall include the likelihood of occurrence, the ability to control and good retail practices.

2.7.1.2 A food defense protocol shall be prepared and include:

- i. The name of senior management person responsible for food defense;
- ii. The measures taken to ensure the secure storage of products, raw materials, packaging, equipment and hazardous chemicals;
- iii. The methods implemented to help prevent access to sensitive points of the premises by employees, contractors, and customers and consumers.

2.7.1.3 The food defense plan shall be reviewed and challenged at least annually.

2.7.1.4 Records of reviews of the food defense plan shall be maintained.

2.7.1 Implementation Guidance
<p>What does it mean?</p> <p>Section 2.7 is about site security, including food defense. The retailer must document and implement a plan to assure the security of the facility and the product from damage or adulteration from sabotage or terrorist-like incident.</p> <p>What do I have to do?</p> <p>This is a mandatory element.</p> <p>The retailer must prepare, implement and maintain a food defense protocol that outlines the methods, responsibilities and criteria for preventing food adulteration caused by deliberate acts of sabotage. This plan must be reviewed, at minimum, on an annual basis. The retailer must designate a member of senior management who has responsibility for food defense. This responsible individual must assure that there are procedures in place for recording and controlling access to areas of the facility by employees, contractors and visitors.</p> <p>The protocol must identify how the retailer limits access to designated areas of the operation to only appropriately authorized employees. The retailer must implement steps to protect sensitive processing points from intentional contamination. The protocol should explain how the company ensures the secure storage and transportation of raw materials, ingredients, packaging, equipment, hazardous chemicals and finished product.</p> <p>Specific areas of program that may be addressed include:</p> <ul style="list-style-type: none"> • Employee identification; • Visitor, contractor, tour access; • Physical security of the facility (e.g., secured doors, windows, outside storage areas); • Secure chemical storage; • Restricted access to sensitive areas of processing; • Secure storage of ingredients, packaging and equipment not in use; • Secure storage and transportation of finished product; • Tamper proof or tamper evident packaging. <p>The protocol must define how these areas are to be addressed. The retailer is free to develop adequate measures to address specific areas to ensure control through a wide variety of solutions.</p>
2.7.1 Auditing Guidance
<p>The retailer must demonstrate to SQF auditor how their specific controls address the intent of the SQF Code requirements and any identified risk. The food defense protocol shall be reviewed initially at the desk audit and compliance will be assessed by observation, interviews with senior management, and review of actual/mock recall records at each facility audit. Evidence may include:</p> <ul style="list-style-type: none"> • Responsibilities for food defense has been assigned to a senior management representative; • A food defense plan is in place that identifies the actions required to prevent a serious incident;

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- The food defense plan identifies methods to protect sensitive processing points;
- The food defense plan identifies methods to provide authorized access to products and facilities;
- The food defense plan identifies methods to secure storage of raw materials, ingredients, packing materials, work-in-progress, finished product, and hazardous chemicals;
- The food defense plan identifies methods to record and control access to the premises by employees, contractors and visitors;

2.8 Training

2.8.1 Training Requirements

What the SQF Code says

2.8.1.1 Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF Food Safety Code for Retail and the maintenance of food safety and regulatory requirements.

2.8.1 Implementation Guidance

What does it mean?

What is considered appropriate training? All company employees that are responsible for conducting tasks related to the food safety plan, or other plan-associated roles must be trained in the procedures that relate directly to their specific responsibilities, as well as those policies that affect product safety. Training may be completed on the job by qualified technical staff or externally by recognized institutions.

What do I have to do?

A training needs analysis must be conducted to identify the skills required for each role in the SQF system. This will be based on the job descriptions (refer 2.1.4.5), procedures and work instructions. It is important to ensure that all relevant positions are covered and that shift employees and relief employees are included to ensure that there are no gaps in the training requirements. Staff in supervisory, management or technical roles must also be included.

The training needs analysis will form the basis for the training program (refer 2.8.1.).

2.8.1 Auditing Guidance

Training requirements will be assessed at each facility audit by interview and examination of records. Evidence may include:

- Training needs analysis has been conducted;
- Training needs analysis is based on job descriptions required within the SQF System;
- Training needs analysis includes coverage for all shifts and relief.

2.8.2 Training Program (Mandatory)

What the SQF Code says

2.8.2.1 An employee training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with:

- i. Developing and applying Good Retail Practices (as appropriate);
- ii. Applying food regulatory requirements;
- iii. Steps identified by the hazard analysis and/or other instructions as critical to effective implementation of the food safety plan and the maintenance of food safety; and
- iv. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF System.

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2.8.2 Implementation Guidance

What does it mean?

Once the training requirements are identified (refer 2.1.4.3.), the retailer must ensure staff are trained to competently carry out their duties and responsibilities. Employees can carry out these activities if they are given clear and concise instructions regarding how, when and where to carry out the tasks and to record the information.

What do I have to do?

This is a mandatory element.

The following programs are considered the minimum required elements for employee training. They can be offered as classroom training or on-the-job training by qualified personnel. Sometimes training can be offered through team meetings. Type and depth of training will depend upon the employee's work designation. Requirements may include:

- Job/task performance
- Company food safety policies and procedures
- Good Retail Practices, including regulatory compliance
- Cleaning and sanitation procedures
- HACCP overview, and specific roles within the HACCP plan
- Security and food defense
- Chemical control
- Hazard communication
- Foodborne pathogens
- Allergen management
- Emergency preparedness

2.8.2 Auditing Guidance

The employee training program will be assessed at the initial desk audit and compliance at each facility audit by interview, observation of tasks and examination of records. Evidence may include:

- The employee training program is based on a training needs analysis (refer 2.1.4.3.);
- The employee training program covers all job descriptions required within the SQF System (refer 2.1.4.5.);
- The employee training program includes good retail practices;
- The employee training program includes pre-requisite programs;
- The employee training program includes food regulatory requirements;
- The employee training program includes hazard analysis relevant to the employee's role in the food safety plan;
- The employee training program includes maintenance of food safety plan relevant to the employees' role in the food safety plan;
- The employee training program includes requirements to meet specifications;
- The employee training program has been effectively implemented and maintained.

2.8.3 Training Requirement

What the SQF Code says

2.8.3.1 HACCP training shall be provided for staff involved in developing and maintaining food safety plans and procedures.

2.8.3 Implementation Guidance

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What does it mean?

Two-day (or equivalent), examinable HACCP training is required for the SQF practitioner (refer 2.1.6.3). However other employees involved in the development of food safety plans must also be trained in HACCP. Also, staff involved in maintenance of the food safety plans must have an understanding of HACCP principles and the HACCP process, and their role in the HACCP process

What do I have to do?

HACCP training for the SQF practitioner must be external training through a recognized training center. For other staff involved in the SQF System, training can be either/or:

- Also through a recognized external training provider;
- On-line;
- Provided internally through a qualified HACCP trainer or SQF practitioner.

Whichever method is used, participants must have a good understanding of the HACCP method and its application within their facility. A record of HACCP training must be retained.

2.8.3 Auditing Guidance

The credentials of the SQF practitioner will be confirmed at the initial desk audit. HACCP training for other staff members shall be confirmed by interview and review of records at each facility audit. Evidence may include:

- HACCP training has been provided for all staff associated with the development and maintenance of food safety plans;
- All staff associated with the development and maintenance of food safety plans understand HACCP principles and the HACCP method;
- All staff associated with the development and maintenance of food safety plans are aware of their roles and responsibilities.

2.8.4 Language

What the SQF Code says

2.9.5.1 Training materials and the delivery of training shall be provided in language understood by staff.

2.8.4 Implementation Guidance

What does it mean?

Where employees do not have as their primary language, the language of the retailer's business, training materials and work instructions must be provided in a language or form that is understood by those employees. For example, retailers in English-speaking countries that employ staff with English as a second language, and/or limited command of English, instruction and training must be available in a language or languages understood by all employees.

What do I have to do?

Suppliers must:

- Establish the common languages of employees working within the facility;
- Consider the literacy level of all employees;
- Provide instructions (refer 2.8.4.) related to the process, food safety in the common languages of employees;
- Provide training (refer 2.8.2.1.) related to the SQF System in the common languages of employees;
- Ensure that the messages delivered through training and work instructions are understood by all employees;
- Ensure training materials and work instructions in other languages are updated as the primary materials are changed.

2.8.4 Auditing Guidance

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Compliance to this requirement shall be confirmed by interview, observation and review of training materials and work instructions at each facility audit. Evidence may include:

- A review of primary languages spoken within the retailer’s staff;
- Review of other language work instructions and training materials available;
- Understanding of foreign language employees of the System and tasks involved.

2.8.5 Refresher Training

What the SQF Code says

2.8.5.1 The training program shall include provision for identifying and implementing the refresher training needs of the organization.

2.8.5 Implementation Guidance

What does it mean?

This element relates back to 2.8.2 – Training Program. The retailer must ensure that training is current and provide refresher training (refer to 2.8.5.) as appropriate. This may be on an annual basis, start of a new season, or as changes occur to the product, process or SQF System.

What do I have to do?

The retailer must identify what refresher training is required and when and how it is to be applied. Refresher training may include:

- Review of the SQF System at the start of a new season for seasonal employees (such as school students only working in summer) or where there is a major rotational system in place (where tasks might not be remembered);
- Training for employees involved in a change to the process, product or procedures within the SQF System;
- Regular update training for permanent personnel.

2.8.5 Auditing Guidance

Compliance to this requirement shall be confirmed by interview, observation and review of the training program at each facility audit. Evidence may include:

- The training program includes refresher training;
- The training program identifies means for achieving refresher training requirements;
- Refresher training is appropriate to the type of business and the SQF System;
- Refresher training is being applied as per training program.

2.8.6 Training Skills Register

What the SQF Code says

2.8.6.1 A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the:

- i. Participant name;
- ii. Skills description;
- iii. Description of the training provided;
- iv. Date training completed;
- v. Trainer or training provider; and
- vi. Supervisor’s verification that the training was completed and that the trainee is competent to complete the required tasks.

2.8.6 Implementation Guidance

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What does it mean?

A training skills register is a file of training records. Training records must identify training applied, skills gained, and the assessment applied to ensure the competency was acquired. The training register must comply with the training program (2.8.6.), which meets the requirements of the training needs analysis.

What do I have to do?

The retailer is required to prepare a staff training skills register and document who is trained and when they were trained to do a particular task. This may be in the form of a formal training file for permanent staff detailing training undertaken and signed and dated by the subject employee, or a training matrix may be used to keep track of large or rotational labor teams.

Whichever form is used, the training register must identify:

- The trainee participant;
- The skill or knowledge applied;
- The type of training provided;
- Date of training;
- Training provider (e.g., internal or external);
- Competency assessment (generally by the immediate supervisor).

It is also advisable to have an overall summary that links the training register back to the training needs analysis, so that gaps in the training program (2.8.2.) can be identified and corrected.

2.8.6 Auditing Guidance

Compliance to this requirement shall be confirmed by interview and review of training records at each facility audit. Evidence may include:

- The training skills register is available and up to date;
- The training skills register includes participant name, skills description, training provided, date of training, training provider, and verification of competencies;
- Individual training skills records are signed and dated by participants;
- Verification of skills are signed and dated by a supervisor or other competent person.

Module 15 Guidance for Good Retail Practices for Retail (GFSI G, H)

This module covers the Good Retail Practices requirements for Retail operations. Companies implementing this module must also meet the requirements of the system elements: SQF Food Safety Code for Retail

Sites implementing this module must also meet the requirements of the SQF System Elements for Retail.

Implementation Guidance

Food intended for human consumption must be produced, processed and handled in a safe and efficient manner. In order to accomplish this, food processing (such as deli, bakery, produce, meats, and seafood departments) and handling facilities shall be designed to facilitate proper processing, handling and storage of product. Module 15 outlines the general requirements for the construction, installation and use of premises and equipment in which food is processed, handled, stored and/or transported with guidance on each aspect provided to assist in understanding various requirements. It also details some of the fundamental good retail practices that must be in place to protect the safety of food.

While the SQF requirements for Module 15 are "shall do...", meaning the element MUST be accomplished, where applicable to the retailer's specific food processing, handling or storing operation, element 2.4.1.5 provides a method to seek exemption, provided the exemption is supported by a risk analysis. It is the retailer's responsibility to develop and present this risk analysis outlining justification for exemption or evidence of the effectiveness of alternate control measures to the certification body and/or SQF auditor for review when questioned.

15.1 Site Requirements and Approval

15.1.1 Facility Environment

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What the SQF Code says

15.1.1.1 The location of the organization’s store(s) shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations and shall adhere to all regulatory requirements.

15.1.1.2 Measures shall be established to maintain a suitable external environment, and the effectiveness of the established measures shall be monitored and periodically reviewed.

15.1.1 Implementation Guidance

What does it mean?

The location and construction of food premises are to be such that neighboring buildings, businesses, or operations do not introduce factors that could adversely affect the safety and quality of food.

What do I have to do?

The supplier must ensure the premises and its surroundings are kept free of contaminants to the products from the external environment. The supplier shall maintain structures, instructions, procedures, etc. that verifies the control of external environmental conditions and for the safety or quality of the process and/or product produced if applicable.

For farms, this may include protection of water courses, prevention of run-off from animal farms onto crops, or measures to avoid spray drift from adjacent properties. Note that identity-preserved farm products (e.g., non-GMO) may require particular protective measures.

For food factories and storage facilities, measures may include protection of exposed products or materials from air-borne contaminants from neighboring facilities. Measures may include physical barriers, sealed factories, positive air pressure, etc.

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15.1.1 Auditing Guidance

Any applicable documented protection measures shall be reviewed initially at the desk audit. However, compliance to this requirement shall be reviewed by observation of adjacent facilities and land use and interviews with operational staff at each facility audit. Evidence may include:

- Investigation of external environment and surrounding land-use to determine risk;
- Understanding of the supplier to the risk from the external environment;
- Physical measures in place to manage exterior environmental risks;
- Procedural measures in place to manage exterior environmental risks;
- The measures are effective in managing the exterior environmental risk.

15.1.2 Local Environment

What the SQF Code says

15.1.2.1 The grounds and area surrounding the premises shall be maintained to minimize dust and be kept free of waste or accumulated debris so as not to attract pests and vermin.

15.1.2.2 Paths, roadways and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.

15.1.2.3 Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises.

15.1.2 Implementation Guidance

What does it mean?

In most jurisdictions, the building and operation of the food premises is governed by local, state, and/or federal regulations. The supplier must be familiar with the applicable regulations and ensure that relevant permits, approvals and notifications are in place.

What do I have to do?

Suppliers must check with local authorities to establish the requirements. However plans and specifications submitted to a local authority for approval may include:

- Locality map showing the site in relation to the area;
- Site plan showing all salient features of the site and a description of adjoining sites including the location of the premises north compass points, roads, storm water, waste water;
- Floor plans showing the layout of the premises, processing areas, permanent fixtures, and layout of equipment;
- Details of major items of equipment used in the processing area;
- A diagram of product/process flow;
- Specifications generally include details of construction materials, surface finishes (walls, floors, ceilings, etc.), product contact surfaces, essential services and the number of personnel;
- Refrigeration equipment and operating temperatures of cold storage rooms, storage capacity and means of loading into and out of cold stores need also be included.

All applicable certificates or inspection documents from local, state, federal or international governing agency shall be current and kept on file.

15.1.2 Auditing Guidance

The auditor shall be familiar with the regulatory requirements applicable to the site and check the certificates and inspection documents from the government agency.

To determine compliance, the auditor must walk around the site, inside and out to determine if there are any outside factors that would impact the certified product. This would include potential threats from neighboring facilities or other environmental conditions.

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15.1.3 Facility Design, Construction, Layout and Product Flow

What the SQF Code says

15.1.3.1 The design, construction, layout, product flow and ongoing operation of the premises of organization's store(s) shall be maintained both externally and internally to:

- i. control the risk of product contamination;
- ii. control the risk of cross-contact;
- iii. implement proper security and protection, and
- iv. be approved and abide by the relevant legislation and regulatory authority.

15.1.3 Implementation Guidance

What does it mean?

The construction (design, layout, and flow of processes) of the facility (including all materials used) shall be constructed and maintained in a way that would be easily cleanable and to prevent contamination of the products, the processes, or operations conducted on the site.

The layout of processes and operations must be designed to minimize the potential for contamination from materials, premises, other processes, other parts of the same process, vehicle (e.g. pallet jacks, forklifts) traffic and pedestrians (e.g. employees, contractors, shoppers or visitors).

What do I have to do?

The overall layout of the facility and the operations within the facility must consider the risks of product contamination and be designed to minimize or eliminate those risks. This is particularly relevant in processes (bakery, deli, where meats are cooked, etc.) where there is a kill-step or other CCP, and the potential for post-CCP contamination must be considered and avoided.

Process flow considerations may include, but is not limited to:

- Avoiding u-shape, or circular processes where the "clean" or high-risk end of the process can be contaminated by the raw material or "dirty" end of the process;
- Controlling walking areas to avoid anyone walking from the "dirty" to "clean" end of the process;
- Ensuring separation of allergenic materials;
- Avoiding equipment bottlenecks, corners or areas where product can be held up or accumulate.

The site shall have designated access points (with proper protocols to follow) for personnel to enter and exit. This is particularly important in high risk areas where product is exposed and when specific entry conditions apply (e.g., put on hairnets, smocks, etc.).

Access points to the building are defined as pedestrian doors, office doors and any door that enters into the site from the outside. Each designated high-risk area within the facility must have access points from lower risk areas where there is adequate controls in place to protect the products from contamination. Doors that are opened to the outside for ventilation must be screened. All processing areas must have areas for employees to be able to wash their hands upon entry into processing and exposed food handling areas.

15.1.3 Auditing Guidance

Compliance to this requirement shall be reviewed at each facility audit by interviews, observations and reviews of records. Evidence may include:

- Knowledge of local, state, and federal regulations on the construction and operation of food premises;
- The site has been approved by relevant authorities for construction;
- The site is approved by relevant authorities for production/processing/storage of the applicable products;

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- Approval has been sought and given for changes to facilities or equipment.
- All exterior doors have protective controls in place;
- Doors or access points between low risk and high-risk areas have protective controls in place;
- Hand wash stations are available at designated access points;
- Employees, contractors and visitors wash their hands at designated access points;
- Process flow has been designed to minimize the risk of cross contamination;
- The flow of personnel is designed to minimize the risk of cross contamination;
- Post kill-step parts of the process are well protected.

15.2 Construction, control of Product Handling and Storage Areas

15.2.1 Fabrication (Input and Material Handling, Preparation, Product Handling, Packing Storage and Sales Areas)

15.2.1.1 Materials and Surfaces

What the SQF Code says

15.2.1.1.1 Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging material storage, cold and hot holding storage and sales areas shall be constructed of materials that will not contribute a food safety risk.

15.2.1.1 Implementation Guidance

What does it mean?

The construction of the material and surfaces used at the site shall be constructed in a way that would be easily cleanable and prevent contamination to the finished product or the process.

What do I have to do?

The main feature of an acceptable product contact surface is that it is impervious, non-corrodible, smooth, easy to clean, light colored, nontoxic and impact resistant. Stainless steel, aluminum, hot-dipped galvanized steel, fiberglass, polyvinyl chloride and nylon are examples of approved product contact surfaces. All other surfaces must be capable of being kept clean and preferably light colored.

Documentation of product contact surfaces being in good condition can be accomplished by making this item a part of a monthly facilities checklist or other type of check list.

15.2.1.1 Auditing Guidance

Compliance to this requirement shall be reviewed at each facility audit by interviews, observations and reviews of records. Evidence may include:

- Knowledge of local, state, and federal regulations on the construction and operation of food premises;
- The site, including the materials used for product contact are approved by relevant authorities for production/processing/storage of the applicable products;
- Approval has been sought and given for changes to facilities or equipment.
- Food contact surfaces are constructed of materials that do not pose a food safety risk;
- Non-food contact surfaces are constructed of materials that do not pose a food safety risk;

15.2.1.2 Floors, Drains and Waste Traps

What the SQF Code says

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15.2.1.2.1 Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned.

15.2.1.2.2 Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or waste water under normal working conditions.

15.2.1.2.3 Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

15.2.1.2.4 Waste trap system shall be contained to prevent cross-contamination or located away from any food handling area or entrance to the premises.

15.2.1.2 Implementation Guidance

What does it mean?

Floors, drains and waste traps shall be designed and constructed in such a way as to minimize the risk to product or process safety.

What do I have to do?

Drains shall be easily accessible for cleaning. Grates need to be removable for access and cleaning. Practices must be demonstrated by the retailer to assess the risks to products and to control those identified food safety risks.

Documentation of floor materials shall be included in the site plan or description of the facility/processing areas. Floors shall be provided with proper drainage. Drains need to be positioned and constructed to allow the effective removal of overflow or waste water under normal working conditions (such as processing or cleaning operations). Where drainage and gradients are not ideal, a written SOP shall address the timely and effective removal of waste water to a drain.

15.2.1.2 Auditing Guidance

Compliance to this requirement shall be reviewed at each facility audit primarily through observations. Evidence may include:

- Floors are smooth and easy to clean;
- Floors are correctly graded to allow for water run-off;
- Floors are made of appropriate, smooth, dense, impact-resistant material;
- There are no areas of water pooling or build-up;
- Procedures are in place to deal with floor areas that are not correctly designed or constructed;
- Drain locations do not pose a safety risk;
- Drain construction does not pose a safety risk;
- Waste traps are located away from food handling areas or entrances to the site.

15.2.1.3 Walls, Partitions, Ceilings and Doors

What the SQF Code says

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15.2.1.3.1 Walls, partitions, ceilings and doors shall be of durable construction. Internal surfaces shall be smooth and impervious, and shall be kept clean (refer to 15.2.5).

15.2.1.3.2 Wall to wall and wall to floor junctions shall be designed and maintained to be easily cleaned and sealed to prevent the accumulation of food debris.

15.2.1.3.3 Ducting, conduit and pipes that convey services such as steam or water shall be designed and constructed so as to allow ease of cleaning.

15.2.1.3.4 Doors, hatches and windows and their frames shall be of a material and construction which meets the same functional requirements for internal walls and partitions.

- i. Doors and hatches shall be of solid construction; and
- ii. Windows shall be made of shatterproof glass or similar material.

15.2.1.3.5 Food shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products.

15.2.1.3.6 Drop ceilings shall be additionally constructed to enable monitoring for pest activity, facilitate cleaning and provide access to utilities.

15.2.1.3.7 Stairs, catwalks and platforms in food processing and handling areas shall be designed and constructed so as not to present a product contamination risk, and shall be kept clean (refer to 15.2.5).

15.2.1.3 Implementation Guidance

What does it mean?

This clause is concerned with the design, construction and condition of the buildings that house food processing operations – the walls, partitions, doors and ceilings. They must be designed and constructed in such a way as to minimize the risk to product safety and in some instances to offer protection to the product. The extent to which these elements are relevant will depend on the type of processes housed and whether the product is enclosed or exposed.

What do I have to do?

Walls, partitions, doors and ceilings need to be described in the site plan. Ceiling design and construction must not pose a threat of product contamination. Wall-to-ceiling, wall-to-wall and wall-to-floor junctions must be sealed and easy to clean.

Walls, partitions, doors and ceilings must be kept clean.

Today's food premises design generally excludes windows in food processing areas. However, older facilities may have glass windows. The retailer must, as part of their foreign matter control program, identify any windows that could pose a hazard to unpackaged product and primary packaging if shattered. Windows away from the immediate processing areas are generally not recognized as posing a hazard to packaged food. Windows close to processing areas and skylights that are located immediately above product processing or packaging areas (such as deli, bakery, produce, meat departments) can pose a hazard. Such windows must be constructed of shatterproof material or otherwise covered to prevent glass or plastic fragments from entering product or packaging. Window ledges need to be sloped downwards for ease of cleaning and to prevent their use for unwanted storage of utensils or other materials.

Doors routinely subjected to water must be of solid construction, impact-resistant, non-corrosive materials preferably with a smooth, light colored surface (to easily see dirt build up). Doors between processing rooms used to transport food for processing need to be protected against damage by carts, crates, trolleys, folk lifts, pallet jacks, or similar traffic.

For efficiency and ease of cleaning, examples of acceptable surfaces include walls with cement render and smooth-finish glazed tiles, fabricated insulated panels or similar materials. Where light colored finishes do not exist, a written Standard Operating Procedure (SOP) shall address the timely and effective inspection of the adequacy of cleaning and resultant corrective actions when discrepancies are noted.

It is recommended that if light colored finishes do not exist, an inspection shall be included in the internal audit and/or cleaning sanitation schedule. Where floor junctions in facilities are not rounded to enable easy cleaning, and to prevent the build-up of waste, a written SOP shall address the cleaning protocol to meet acceptable hygienic standards for these areas.

Service ducting, conduit and pipes ideally need to be recessed into walls or ceilings, suspended from ceilings, housed inside drop ceilings with vertical drops to their point of use, or mounted a sufficient distance from walls or ceilings. In other words, they should be constructed to avoid build-up of debris, prevent rodent runs and allow ease of cleaning.

Drop ceilings offer some advantages and disadvantages. They can provide a clean, smooth, impervious ceiling surface in the processing area and an area for service runs. However, they can also allow for an "out of sight, out of mind" mentality and can accumulate dust and provide harborage for pests. Drop ceilings, if used, must be checked and cleaned regularly (refer 15.2.1.3.6.).

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Where drop ceilings are not used, cleaning regimes and inspections must check for dust on ledges, loose fittings, glass windows, light fittings, or other areas where dust can accumulate and fall onto product.

15.2.1.3 Auditing Guidance

Compliance to this requirement shall be reviewed at each facility audit primarily through observation. Evidence may include:

- Walls and partitions are of sound construction and made of suitable materials;
- Doors are of sound construction for the volume and type of traffic;
- Ceilings are of sound construction and made of suitable materials;
- Walls, partitions, ceilings, and doors are kept clean;
- Where a drop ceiling is used, the area is kept clean and tidy;
- Service lines are designed and constructed for ease of cleaning;
- The condition of walls, partitions, doors, ceilings, does not pose a food safety risk.

15.2.1.4 Lightings and Light Fittings

What the SQF Code says

15.2.1.4.1 Lighting in food processing and handling areas shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

15.2.1.4.2 Light fittings in processing areas, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling. Where fittings cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials and addressed in the cleaning and sanitation program.

15.2.1.4.3 Light fittings in storage and other areas where the product is protected shall be designed such as to prevent breakage and product contamination.

15.2.1.4 Implementation Guidance

What does it mean?

Adequate light intensity is required for processing operations, cleaning and inspection tasks. However, the design and construction of lighting can pose a risk to product due to breakage or dust accumulation.

What do I have to do?

Lighting shall provide minimum lux (foot candle) intensity as prescribed by applicable legislation or in their absence, meet good retailing best practices appropriate. In general, processing and food handling areas are illuminated to a minimum intensity of 200 lux (18.58 foot candle). Inspection areas require higher illumination; 500 lux (46.45 ft.c.) is generally recommended. Please check with your State or local regulatory agencies for your requirements. Other generally accepted light intensities in the industry include:

- Walk-in refrigeration units and dry food storage and other rooms in the facility: 108 lux (10 foot candles at a distance of 75cm above the floor or about 30 inches above the floor)
- Food Contact surfaces where consumers self-serve (salad bars and buffets or fresh produce display): 215 lux (20 foot candles)
- Food Contact surface where employees handle or process (utensils or equipment use): 540 lux (50 foot candles)
- All employees must have adequate light to be able to see to perform their jobs and consumers must be able to see the products and read labels of products.

Light fittings in food processing and handling areas are required to be fitted with protective covers or have shatterproof lights installed. Documentation needs to be kept on file and is to include specifications from the manufacturer with a description of the product. An acceptable practice is to recess the light into the ceiling, where possible or have it fitted flush to the ceiling. Where light fittings are not able to be recessed, they must be protected from accidental damage. In circumstances where light fittings are suspended from cables, the top of the fitting needs to be sloped at an angle that permits easy cleaning. Exposed light fittings must be included in a cleaning and sanitation schedule.

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15.2.1.4 Auditing Guidance

Compliance to this requirement shall be reviewed at each facility audit primarily through observation. Evidence may include:

- Lighting intensity is sufficient in food processing areas;
- Lighting intensity is sufficient at inspection stations;
- Lighting intensity is sufficient in warehousing and storage areas;
- Light fixtures are shatterproof or protected, and pose no threat to product safety;
- Light fittings are intact – there is no sign of breakage;
- Light fittings are clean and part of a regular cleaning regime.

15.2.1.5 Dust, Insect and Vermin Proofing

What the SQF Code says

15.2.1.5.1 All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed, pest and insect proofed and provide adequate dust control.

15.2.1.5.2 External doors, including overhead dock doors in food handling areas, used for product, pedestrian or truck access shall be pest-proofed by at least one or a combination of the following methods:

- i. A self-closing device;
- ii. An effective air curtain;
- iii. A pest-proof screen;
- iv. A pest-proof annex;
- v. Adequate sealing around trucks in docking areas; or
- vi. Other means to help prevent or minimize insect entry.

15.2.1.5.3 Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to the product, packaging, containers or processing equipment. Poison bait shall not be used inside ingredient or food storage areas or processing areas.

15.2.1.5 Implementation Guidance

What does it mean?

This element is closely related to *15.2.4. Pest Control*. This element provides the requirements for physical barriers to pest and dust ingress into food production areas – via external doors, windows or other means. It also covers the location and use of control measures to trap pests within the premises.

What do I have to do?

Exterior doors opening directly into processing areas must be effectively sealed to prevent dust and/or entry of pests.

Dock doors must be effectively sealed to prevent pest entry into the facility using the industry best practices (dock shelters, seals and brushes around dock levellers, etc.).

Doors used for personnel access shall be self-closing unless used exclusively as a fire exit.

Doors between storage/receiving areas and food display and processing areas must be designed to prevent pest from entering areas where consumers purchase foods and employees prepare foods for consumers (such as grocery display, deli, meat, bakery, produce prep areas, etc.).

All pest devices used must be approved and used per applicable legislation so as not to present a contamination risk to the product, packaging containers or equipment.

In 15.2.4.2, "bait" refers to poison baits or glue boards. Indicator baits that conform to local regulations may be used inside processing areas.

15.2.1.5 Auditing Guidance

Compliance to this requirement shall be reviewed at each facility audit primarily through observation, and records of pest activity (refer 15.2.4.2.). Evidence may include:

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- Windows are closed or protected and sealed against dust or pests;
- Doors are closed or adequately protected against dust or pests;
- Personnel doors have self-closing devices or other method to ensure effective protection;
- External doors are adequately fly-proofed;
- Sealing around trucks in docking areas is adequate;
- Insect devices are located so as not to pose a threat to product, tools or equipment;
- Poison baits or glue boards are not used in processing areas.

15.2.1.6 Ventilation

What the SQF Code says

15.2.1.6.1 Adequate ventilation shall be provided in enclosed processing and food handling areas.

15.2.1.6.2 Extractor fans and canopies shall be provided in areas where cooking operations are carried out or a large amount of steam is generated and shall have the following features:

- i. Capture velocities shall be sufficient to prevent condensation build up and to evacuate all heat, fumes and other aerosols to the exterior via an exhaust hood positioned over cooker;
- ii. Fans and exhaust vents shall be pest proofed and located so as not to pose a contamination risk; and
- iii. Where appropriate, positive air-pressure system shall be installed to prevent airborne contamination.

15.2.1.6 Implementation Guidance

What does it mean?

Poor ventilation can result in condensate build-up in cooking areas (deli, bakery, etc.) or other areas where heat or steam are applied, and can result in contamination due to condensate dripping onto product or food-contact surfaces. Also (where applicable), in high-risk processing areas, positive air pressure must be maintained to prevent airborne contaminants being drawn into the area.

What do I have to do?

Cooker/washer steam shall be adequately ventilated to the outside. Ventilation in enclosed food processing areas must meet applicable design and construction legislation and prevent condensation over food and surfaces of food contact equipment. Vents and exhausts must be screened to prevent ingress of flying insects.

Positive air pressure must be maintained in high risk processing areas to prevent airborne contaminants being drawn into the area.

15.2.1.6 Auditing Guidance

Compliance to this requirement shall be reviewed at each facility audit primarily through observation and interview. Evidence may include:

- Food processing areas have adequate ventilation;
- Cooking areas are adequately exhausted;
- There is no condensation present over product or food contact surfaces in cooker areas;
- Exhaust vents are adequately fly-proofed;
- Positive air pressure exists in high risk processing areas.

15.2.2 Equipment

What the SQF Code says

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15.2.2.1 Equipment and utensils shall be designed, constructed, installed, operated and maintained so as not to pose a contamination threat to products.

15.2.2.2 All food processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious and free from cracks or crevices.

15.2.2.3 Product containers, tubs, bins for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious and readily cleaned. Bins used for inedible material shall be clearly identified.

15.2.2.4 Waste and overflow water from tubs, tanks, sinks, condenser units and other equipment shall be discharged to the floor drainage system.

15.2.2.5 All wash down hoses shall be stored on hose racks after use and not left on the floor.

15.2.2.6 All display equipment shall be maintained to protect product offered for sale.

15.2.2 Implementation Guidance

What does it mean?

This is a general provision covering the condition and use of equipment, including utensils, benches, tables, bins, and protective clothing, so that they do not pose a threat to product safety or quality. This area also covers for waste water and any overflow water (from multiple sources such as washing equipment, condensate lines from refrigerator and freezer units, sinks, etc.) shall be discharged to a drain and not onto the floor before the drain. The amounts of water and waste water on the floor need to be minimized to prevent pathogen growth and not damage the floors and not be a slip hazard to workers and consumers.

What do I have to do?

Food processing equipment shall be designed, constructed and maintained in accordance with manufacturer and/or industry standards. Metal frames, supports and brackets supporting sinks, wash basins, benches, tables and shelves are generally constructed of solid materials such as hot dipped galvanized iron, stainless steel or aluminium and securely fixed to the walls or on metal frames. Equipment shall be smooth-finished, free from angles, ledges and crevices and easy to clean. The open ends of tubular legs or rails must be sealed to prevent the accumulation of process waste and residues.

Where equipment is dismantled for cleaning, it is to be designed free of loose bolts or nuts or other objects that could inadvertently find their way into a food product or provide points for accumulation of food waste.

Containers (e.g., tubs, bins, etc.) used for inedible food or materials must be clearly identified (i.e., color-coded or labelled). Containers previously used for pesticides, insecticides or other deleterious materials must not be re-used for product handling (refer 15.2.4.5).

Where protective clothing (e.g., gloves, face shields, etc.) is provided and used, it must be made of a material that is food-safe and is easily cleaned. There must be a cleaning regime in place for protective clothing.

15.2.2 Auditing Guidance

This element shall be reviewed at each facility audit through observation and interview with operational staff. Evidence may include:

- Food processing equipment is properly designed;
- Food processing equipment is properly maintained;
- Food contact utensils are properly designed;
- Food contact utensils are properly maintained;
- Containers for inedible materials are correctly labeled;
- Waste water and overflow from tanks and tubs is properly drained;
- Protective clothing is provided that is fit for purpose;
- Protective clothing is provided that is made of material that will not contaminate food and is easily cleaned;
- There is a cleaning process in place for protective clothing;
- Properly designed racks are provided for protective clothing;
- Protective clothing is stored in an area accessible to staff.

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15.2.3 Maintenance

What the SQF Code says

15.2.3.1 The methods and responsibility for the maintenance and repair of equipment and buildings shall be documented, planned and carried out in a manner that minimizes the risk of product, packaging or equipment contamination.

15.2.3.2 Maintenance staff and contractors shall observe the following practices when undertaking maintenance and repairs in any food processing, handling, storage or sale areas:

- i. Routine maintenance of building and equipment shall be performed according to a maintenance-control schedule and recorded;
- ii. Failures of facility and equipment shall be documented, reviewed and their repair incorporated into the maintenance control schedule;
- iii. Compliance with the personnel and process hygiene requirements (refer to 15.2.5) by maintenance staff and contractors;
- iv. Inform the site supervisor if any repairs or maintenance pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance and active store renovations shall be conducted outside food processing or handling times;
- v. Remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor so appropriate hygiene and sanitation can be completed prior to the commencement of food processing or handling occurs.

15.2.3.3 The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance of product safety and quality.

15.2.3.4 Equipment located over product or product conveyors shall be lubricated with food grade lubricants and their use controlled so as to minimize the contamination of the product.

15.2.3.5 Paint used in a food handling or contact zone shall be suitable for use and in good condition and shall not be used on any product contact surface.

15.2.3 Implementation Guidance

What does it mean?

Maintenance activities – both planned and breakdown – can have a major impact on food safety, if not effectively implemented. Maintenance procedures must be carefully planned, designed, documented and implemented to avoid contamination of product, materials or equipment and to ensure that maintenance staff, including contractors, have an understanding of the safety implications of maintenance activities.

What do I have to do?

A written protocol must outline that maintenance staff and service contractors engaged to complete work in food production areas must observe all personnel and process hygiene requirements. Service contractors must be provided with protective clothing, as required. The procedures must describe the practices under which repairs are to be completed in any product handling or storage areas including the following requirements that maintenance staff must observe:

- Maintenance of equipment or building structures must be completed in a manner that does not pose a risk to the product, materials (including packaging materials) or equipment;
- The facility leadership (including any in house maintenance supervisors) must ensure they are notified by all contractors engaged to complete work in any product handling areas. They must ensure that all service contractors are aware of the retailer’s personnel hygiene requirements and that they are provided with any necessary protective clothing, or that protective clothing meets the same requirements as those of the retailer staff;
- Maintenance staff and service contractors must ensure that they account for and remove all tools and debris from any maintenance activity once it has been completed in any product handling area and inform the area supervisor so appropriate sanitation can be completed;
- Service contractors are to inform the maintenance supervisor (or facility leadership) if any required work poses a potential threat to product, packaging or equipment safety (i.e. pieces of electrical wire, damaged light fittings, loose fittings overhead, etc.). When necessary, maintenance must be conducted outside processing times;

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- Service contractors shall notify the facility leadership or maintenance supervisor in the event of any breakage or damage that could expose products, packaging or equipment to contamination;
- Service contractors must notify the facility leadership or maintenance supervisor when work has been completed;
- Plant supervisors and operators must ensure appropriate and effective clean up measures are taken once all maintenance or service contractor activity is completed and prior to the commencement of facility food operations.

It is essential that retailer staff, maintenance personnel and service contractors adhere to the correct procedures when completing maintenance on all equipment or facility. As part of maintenance procedures, repaired equipment must be inspected for missing parts (nuts, bolts, springs, etc.) prior to use.

Those responsible for reporting and completing repairs and cleaning the equipment after repairs must be specified in maintenance procedures.

The use of temporary fasteners such as string, wire or tape is not permitted (refer 15.4.2.5.3.).

Where machinery that exists over open and exposed product or food contact surfaces requires lubrication, only food grade lubricant is to be used. Even then, food-grade lubricant is still a hazard and must be used sparingly to avoid contact with product.

Where paint is used on equipment, roofs, walls or floors, it must be in good condition and suitable for use. Paint must not be used on food contact surfaces.

15.2.3 Auditing Guidance

Maintenance schedule and procedures shall be reviewed at the initial desk audit. Subsequently, compliance to this requirement and the retailer maintenance schedule and procedures shall be reviewed at each facility audit through observation, review of records and interview with operational, maintenance staff and contractors. Evidence may include:

- There is a planned maintenance schedule;
- The maintenance schedule includes critical equipment and areas of the site;
- There are maintenance procedures that include food safety issues;
- The planned maintenance schedule is being followed;
- Maintenance procedures afford no risk to product safety and integrity;
- Maintenance procedures are known by maintenance personnel and contractors;
- Maintenance procedures are being followed;
- Maintenance procedures include food safety and hygiene practices;
- Maintenance staff follow food safety and hygiene practices;
- Maintenance contractors follow food safety and hygiene practices;
- Preventative maintenance activities are documented;
- Facility and equipment failures are documented;
- The maintenance schedule is adjusted for facility and equipment failures;
- Operating staff and supervisors are notified when repairs are made/completed;
- All tools, parts and debris are removed from repair areas;
- Sanitation activity occurs after maintenance repair in food processing areas;
- Notification occurs when potential risk to product is evident through maintenance activities or breakdowns;
- Food grade lubricant is used in food contact zones and on all motors over food contact surfaces;
- Food grade lubricant is used sparingly and does not come into contact with food product, materials, or food contact surfaces;
- Paint is not used on product contact surfaces;
- Maintenance records are available and complete.

15.2.4 Pest Control

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What the SQF Code says

15.2.4.1 The methods and responsibility for integrated pest management shall be documented and effectively implemented. The premises, its surrounding areas, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests.

15.2.4.2 The pest management program shall:

- i. Describe the methods and responsibility for the development, implementation and maintenance of the pest management program;
- ii. Identify the target pests for each pesticide application;
- iii. Outline the methods used to prevent pest problems;
- iv. Outline the pest elimination methods;
- v. Outline the frequency with which pest status is to be checked;
- vi. Include on a store map the identification, location, number and type of bait stations set;
- vii. List the chemicals used (they are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available);
- viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come in contact with a bait station;
- ix. Outline the requirements for staff awareness of pest control and when applicable, training in the use of pest control chemicals and baits; and
- x. Measure the effectiveness of the program to verify the elimination of applicable pests.

15.2.4.3 Inspections for pest activity shall be undertaken on a regular basis by trained personnel or licensed Pest Control Operator (PCO) and the appropriate action taken if pests are present.

15.2.4.4 Records of all pest control applications shall be maintained.

15.2.4.5 Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 15.4.1.4 and handled and applied by properly trained personnel. They shall be used by or under the direct supervision of trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.

15.2.4.6 Pest Control Service Provider shall be:

- i. Licensed and approved by the local relevant authority;
- ii. Use only trained and qualified operators who comply with regulatory requirements;
- iii. Use only approved chemicals;
- iv. Provide a pest control management plan (refer to 2.3.1) which will include a store map indicating the location of bait stations and traps;
- v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; and
- vi. Provide a written report of their findings and the inspections and treatments applied.

15.2.4.7 The organization's store(s) shall dispose of unused pest control chemicals and empty containers in accordance with regulatory requirements and ensure that:

- i. Empty chemical containers are not reused;
- ii. Empty containers are labelled, isolated and securely stored while awaiting collection; and
- iii. Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

15.2.4 Implementation Guidance

What does it mean?

Integrated pest management (IPM) is a holistic approach that integrates a range of practices to minimize the incidence of pest activity.

The Food and Agriculture Organization (FAO) of the United Nations defines IPM as "the careful consideration of all available pest control techniques and subsequent integration of appropriate measures that discourage the development of pest populations and keep pesticides and other interventions to

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levels that are economically justified and reduce or minimize risks to human health and the environment.”

In other words, a range of integrated measures are required to minimize pest populations, including mechanical preventions (e.g., sealed doors and windows, air curtains, etc.), mechanical controls (e.g., baits, traps, etc.), waste minimization, appropriate use of pesticides, etc.

This element covers primarily traditional pest management activities, including pesticide application. However it is related to 15.2.1.5. *Dust, fly, and vermin proofing*, which is also part of an overall IPM approach.

What do I have to do?

A fully maintained pest and vermin control program is essential to the safe function of any general processing operation. The pest and vermin control program must:

- Identify the target pest (s) for each pesticide application;
- Outline the frequency with which pest status is to be checked;
- Identify the location of bait stations, traps and chemical sites for ease of checking;
- Outline the methods used to prevent pest problems (the recommendation is to be proactive);
- Outline the methods used when pests are found;
- Maintain licenses and credentials of the pest control operator (s);
- List the chemicals used;
- Assure chemicals used are approved by the relevant authority and that SDS are accessible; and
- Outline the requirements for staff awareness and training in the use of chemicals.

The location of internal and external pest control devices must be completed based on the risk to the site and the product. Factors that can affect this include product type, processing type, location of site, surrounding environment, types of facilities, external storage of equipment (such as equipment graveyards), neighboring facilities and land use. The site and surrounding areas must be kept free of waste, redundant equipment and associated debris to minimize harborage for pests.

Pest control devices should be located at all product storage, material and packaging storage facilities in addition to the main processing facilities. Inspections for pest activity must take place on a regular basis, the results recorded and the actions taken if pests are present. This can be incorporated into the operation’s internal audit program.

Examples of records of pest control applications include service reports, pesticide usage logs, pest sighting logs, corrective action reports and trending of activity by the service provider.

In addition to the pests most commonly seen in food facilities (i.e., flies, mice, rats, roaches, etc.), pest management procedures need to also consider and control domestic and feral animals and birds where applicable.

Personnel handling pest control chemicals must be trained and authorized to do so. Where external pest management contractors are used, they must be licensed by the relevant local authority and use only approved pest control chemicals. Chemicals must be stored appropriately and separate from any food materials or products (refer 15.4.1.4.), and used chemical containers disposed of correctly.

15.2.4 Auditing Guidance

Pest management procedures shall be reviewed at the initial desk audit. Subsequently, compliance to this requirement and the retailer pest management procedures shall be reviewed at each facility audit through observation, review of records and interviews with operational staff and possibly the pest contractor (if applicable). Evidence may include:

- The potential pests are known;
- There is a documented pest management program that integrates a number of preventative as well as control measures;
- The documented pest management program targets all known pests;
- The documented pest management program includes responsibilities for pest management;
- The documented pest management program targets includes methods to eliminate or minimize all known pests;
- The pest management program includes frequencies for checking pest status;
- The pest management program includes the exterior or surrounding areas of facility;

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- The methods, frequencies and responsibilities identified in the pest management program are effectively implemented;
- External areas are kept clear and free from waste and debris;
- There are no observed pest harborage areas observed within the facility or in the immediate surrounds;
- There is a site map of pest control devices;
- Pest control devices meet regulatory requirements;
- There is a list of approved pest control chemicals;
- Only approved pest control chemicals are used;
- SDS sheets are available for all pest control chemicals;
- Pesticides are correctly labeled;
- Empty or redundant pest control chemical containers are correctly disposed of;
- Pest control contractors are trained, licensed and approved;
- Pest control inspections are thorough and conducted at the correct frequency;
- Retailer's staff are aware of pest control devices and activities;
- Appropriate corrective action is taken in response to pest control inspections;
- Pest control records are current and maintained.

15.2.5 Housekeeping, Cleaning and Hygiene

What the SQF Code says

15.2.5.1 The methods and responsibility for the cleaning and frequency of cleaning of the food handling and processing equipment and environment, storage areas and storage equipment, staff amenities and toilet facilities, and sales displays shall be documented and implemented. Consideration shall be given to:

- i. What is to be cleaned;
- ii. How it is to be cleaned;
- iii. When it is to be cleaned;
- iv. Who is responsible for the cleaning;
- v. Methods used to confirm the correct concentrations of detergents and sanitizers; and
- vi. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

15.2.5.2 Provision shall be made for the effective cleaning of; processing, storage and sales equipment, utensils, cleaning tools and protective clothing.

15.2.5.3 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards and other utensils, cleaning tools and for cleaning of protective clothing used by staff when applicable. These cleaning operations shall be controlled so as not to interfere with processing operations, equipment or product. Racks and containers for storing cleaned utensils and protective clothing, if applicable, shall be provided as required.

15.2.5.4 Pre-operational hygiene and sanitation inspections shall be conducted by qualified personnel to ensure food processing areas, product contact surfaces, equipment, staff amenities and sanitary facilities and other essential areas are clean before the commencement of production.

15.2.5.5 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.

15.2.5.6 Detergents and sanitizers shall be suitable for use in a food processing environment, and purchased in accordance with applicable legislation.

The organization shall ensure:

- i. Detergents and sanitizers are stored as outlined in element 15.4.1.4;
- ii. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and
- iii. Only trained staff handles sanitizers and detergents.

15.2.5.7 The organization's store(s) shall dispose of unused detergents and sanitizers and empty containers in accordance with regulatory requirements and ensure that:

- i. Empty detergent and sanitizer containers are appropriately cleaned, treated and labeled before use;

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- ii. Empty detergent and sanitizer containers are labeled, isolated and securely stored while awaiting collection; and
- iii. Unused and obsolete detergents and sanitizers are stored under secure conditions while waiting authorized disposal by an approved vendor.

15.2.5.8 A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

15.2.5.9 The organization shall have a procedure for bodily fluid clean-up.

15.2.5 Implementation Guidance

What does it mean?

Cleaning and sanitation methods will vary depending on the nature of the operation, and the microbiological and allergen risk. Facility food handling and processing areas (deli, bakery, meat, produce, seafood, self-service, etc.) must have adequate cleaning and sanitation regimes. This element covers cleaning and sanitation protocols generically, but specifies the correct use and type of cleaning detergents, sanitizers (also referred to as disinfectants) and the requirement for post-clean inspections.

It is important to stress that, irrespective of the type of production and risk, all food facilities require an appropriate documented and implemented cleaning program. The program must be verified to ensure its effectiveness.

What do I have to do?

A written cleaning program shall be in place and fully implemented that includes provisions for effective cleaning of equipment, facilities, utensils, amenities and external areas. The cleaning program shall identify the what, how, when and who for every item of equipment, utensils, food contact surfaces and the facility itself (floors, walls, ceilings, etc.). Responsibilities shall be identified, including responsibility for the visual or test inspection, and the verification of cleaning methods.

For small items of equipment such as tools, knives, tubs, cutting boards, etc., a wash area shall be provided with sufficient hot and cold running water, a suitable detergent and sanitizer for cleaning and when necessary, suitable racks for draining/drying equipment, utensils, and protective clothing. These areas shall be identified and constructed so they do not present a hazard to other food handling or processing operations. Protective clothing racks (refer 15.2.5.3.) provide temporary storage for gloves, aprons and other items when staff needs to leave the handling or processing area for meals or other short breaks. Used disposable protective clothing must be immediately disposed of in an appropriate manner. Non-disposable protective clothing shall be cleaned according to the written procedures.

The cleaning and sanitation protocol shall include the following detail:

- List all the areas and equipment to be cleaned;
- The frequency for cleaning and sanitizing different areas of the premises and all associated equipment including pre-operative cleaning and cleaning between breaks;
- A full description of the cleaning and sanitation procedures for each piece of equipment or area of the operation. This should include:
 - Physically remove solid particles by sweeping or wiping;
 - Apply a suitable detergent in the correct concentration to remove grease and other food residues (follow directions on the chemical label);
 - Rinse off residual food residue and detergent;
 - Apply a suitable sanitizer in the correct concentration to reduce or eliminate microbiological contaminants;
 - Rinse to remove residual sanitizer, if indicated on sanitizer label;
 - Dry, as indicated, in a manner that will prevent recontamination.
- Ensure operators involved in cleaning, including contract cleaners, are fully trained in cleaning and sanitation procedures;
- Chemicals must be approved for use by the appropriate authority; maintain on file Safety Data Sheets (SDS) for each chemical used. Describe the chemicals used, their dilution rate and method of application;
- Chemical cleaners and sanitizers must be used and stored in an approved manner (refer 15.2.5.7. and 15.4.1.4.5.);

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- Evaluation of cleaning. Monitor the effectiveness of cleaning and keep records of all inspections implemented to verify the effectiveness of the cleaning program;
- Maintain an inventory of chemicals purchased and used;
- Outline requirements for the disposal of unused compounds and empty containers in accordance with regulatory requirements.

To verify the effectiveness of sanitation, a visual pre-operational inspection of equipment and facility is to be conducted prior to the start of operations, after a sanitation activity or the beginning of a shift. For high risk operations and allergen cleaning verification (refer 15.4.3.1.), a more thorough swabbing program shall be implemented to verify the integrity of the cleaning regime.

To verify the facility is operating in a sanitary manner throughout the shift, sanitation shall be monitored and documented regularly by the shift supervisor or a designated employee.

Any corrective actions taken when inspection reveals a problem must be recorded.

15.2.5 Auditing Guidance

Cleaning and sanitation procedures and schedule shall be reviewed at the initial desk audit. Subsequent compliance to this requirement and the retailer cleaning and sanitation procedures shall be reviewed at each facility audit through observation, review of records, and interviews with operational staff and cleaning contractors if applicable. Evidence may include:

- The facility has an effective and appropriate cleaning program in place;
- All critical equipment and areas of the facility are covered in the cleaning program;
- Cleaning methods include what is to be cleaned, how it is to be cleaned, frequency of cleaning and responsibility for cleaning;
- The cleaning program includes measures for verification of the effectiveness of sanitation;
- The cleaning of processing equipment is effective;
- The cleaning of utensils and protective clothing is effective;
- The cleaning of buildings, surrounds, and amenities is effective;
- Cleaning of utensils is carried out in an area separate from processing operations;
- Racks and areas for storing cleaned utensils are provided and appropriate;
- Pre-operational inspections are completed to ensure cleanliness;
- All critical areas of the facility are included in pre-operational inspections;
- Personnel conducting pre-operational inspections are trained and qualified;
- A sanitation verification schedule is available;
- Methods are established for verification of sanitation;
- Responsibility is established for verification of sanitation;
- An inventory of purchased chemicals is available and is current;
- Detergents and sanitizers meet local regulatory requirements;
- SDS sheets are available for all cleaning chemicals purchased;
- Personnel handling cleaning chemicals are properly trained;
- Cleaning chemicals are disposed of as per regulatory requirements;
- Empty cleaning chemical containers are labeled and securely stored;
- Records of cleaning and sanitation activities are maintained and complete;
- Records of hygiene inspections are maintained and complete.

15.3 Personnel Hygiene, Welfare & Personnel Processing Practices

15.3.1 Staff and Public Facilities

15.3.1.1 Toilet Rooms

What the SQF Code says

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15.3.1.1.1 Toilet rooms shall be:

- i. Designed and constructed so that they are accessible to staff, customers and consumers and separate from any processing and food handling operations;
- ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room;
- iii. Sufficient in number for the maximum number of staff, customers and consumers;
- iv. Constructed so that they can be easily cleaned and maintained; and
- v. Kept clean and tidy.

15.3.1.1.2 Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system.

15.3.1.1.3 Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 15.3.2.2.

15.3.1.1 Implementation Guidance

What does it mean?

Sufficient restrooms/toilets are required to accommodate the number of staff. Their location and design must be such that they do not cause a contamination risk to product, food contact surfaces, areas where product is exposed or to food handlers.

What do I have to do?

Restroom/toilet facilities must be located so that they do not open directly into the food handling or processing area. In existing facilities where they are in close proximity to areas where product is exposed, an airlock vented to the exterior must be maintained (negative pressure). Staff shall enter toilet rooms from handling or processing areas through either an intervening room or air lock which is ventilated to external air.

Where exhaust fans are fitted, they must be exhausted to the outside and not into a food handling or production areas (where food is open and exposed). The light and exhaust fan can be inter-wired to create negative pressure as an option or the light and exhaust fan can be left on continuously.

To eliminate the risk of air flow from restrooms into the processing room, exhaust fan off-switches may be on timer delay. The light and exhaust fan may be on a single switch located on the outside of the restroom.

Toilet rooms shall be provided based on local regulatory or building code requirements and meet public health standards. They are typically located adjacent to consumer shopping areas, employee break rooms, but must be separate from the food handling or processing rooms. The number of toilet cubicles to be provided depends on the number of staff or is based on applicable legislation. Retailers must be aware of local legislation, but as a guide:

Persons of the same sex	No. of bowls
1-15	1
16-35	2
36-55	3
56-80	4
>80 for each additional 30 persons	1

In male toilets, urinals can substitute for up to one-third of the total number of bowls.

Employee restrooms shall be properly equipped with hand wash facilities (refer 15.3.1.1.3.). Hands-free taps are preferred, particularly in high risk facilities and include those than can be operated by foot, knee or elbow or turned on/off via electronic sensing devices.

Signage may consist solely of icons (such as those published by the International Association for Food Protection) to remind people of these requirements, with exception of restroom signage, where other regulatory requirements must be applied.

Sanitary drainage must be kept separate from drainage from food production areas.

15.3.1.1 Auditing Guidance

This element will be audited as part of each facility audit through observation and interviews with operational staff. Evidence may include:

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- There are sufficient toilets available for each gender and the number of employees;
- Toilets do not open directly into processing areas;
- Toilets can be easily cleaned;
- Toilets are clean and tidy;
- Sufficient hand wash basins are available near the toilets;
- Sanitary drainage is separated from processing facility drains.

15.3.1.2 Staff Amenities

What the SQF Code says

15.3.1.2.1 Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and processing of product.

15.3.1.2.2 Provision shall be made for staff to store their street clothing and personal items separate from food contact zones, food and packaging storage, and sales areas.

11.3.6 Implementation Guidance

What does it mean?

Staff amenities include areas such as employee restrooms, lunch rooms, locker rooms. These areas have to be well maintained and kept clean. There must be adequate lighting and ventilation in these areas. The size of these areas must be adequate for the numbers of people using them at any one given time.

What do I have to do?

Provide adequate lunchroom and restroom facilities, as appropriate for the number of employees in the operation based on applicable legislation relevant to the commodity being processed.

Provided amenities must have adequate lighting and ventilation.

11.3.6 Auditing Guidance

This element will be audited as part of each facility audit through observation and interviews with operational staff. Evidence may include:

- Amenities are provided commensurate with the type of operation and the number of employees;
- Amenities are available for all employees who handle product;
- Staff amenities have adequate lighting;
- Staff amenities have adequate ventilation.

15.3.1.3 Break/ Lunch Rooms

What the SQF Code says

15.3.1.3.1 Separate break/lunch room facilities shall be provided away from a food contact/handling zone.

15.3.1.3.2 Break/Lunch room facilities shall be:

- i. Ventilated and well lit; and
- ii. Kept clean and free from waste materials and pests.

15.3.1.3.3 Signage in appropriate languages instructing people to wash their hands upon entering the food processing areas shall be provided.

15.3.1.3 Implementation Guidance

What does it mean?

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Employees, contractors and visitors are not permitted to eat or drink in food handling areas (refer 15.3.2.1.3.). Designated lunch rooms must therefore be available for staff to take breaks and eat meals. These areas must be physically separated from food handling areas.

What do I have to do?

The retailer may provide additional outdoor lunchroom facilities (e.g., picnic tables) where they do not pose a dust or pest hazard to the food handling or processing areas of the site. Covered facilities and sealed paths are one way to address these hazards. Where hazards presented by such facilities are minimal, the retailer may employ alternative controls such as routine cleaning of tables and steps to minimize dust on non-sealed paths.

Foot baths also provide another means to ensure that foot traffic does not bring dust or other contaminants into the food handling or processing area, if practical to do so.

Each site shall be equipped with a ventilated and well-lit lunch/break room for employees. The room must be equipped with a sink serviced with hot and cold potable water, a refrigerator and a microwave. The area must be kept clean.

15.3.1.3 Auditing Guidance

This element will be audited as part of each facility audit through observation and interviews with operational staff. Evidence may include:

- Separate lunch facilities are provided;
- Lunch room facilities are adequate for the number of staff;
- Lunch facilities are separated from processing, product storage or handling areas;
- Lunch room facilities are properly ventilated;
- Lunch room facilities are well lit;
- Lunch room facilities include a sink with hot and cold running water;
- Lunch room facilities are clean and tidy;
- Proper heating or cooling facilities are provided in lunch facilities;
- Hand wash signage is available at the exit of the lunch facilities;
- Hand wash signage at the exit of lunch facilities is in appropriate languages.

15.3.1.4 Bodily Fluid Clean Up Procedures

What the SQF Code says

15.3.1.4.1 Bodily fluid clean up procedures, properly trained employees and proper materials shall be provided to safely clean up bodily fluid spillage events.

15.3.1.4 Implementation Guidance

What does it mean?

Retail facilities must have the ability to clean up any bodily fluid spills anywhere in their facility. This means they have to prepare and implement written procedures for the effective cleaning and disinfection of any bodily fluid spill and have adequately trained staff to carry out these procedures. It is essential to have the appropriate tools and supplies to complete these cleaning procedures to prevent any contamination of food products, employees, contractors, visitors and consumers (shoppers) in the facility.

What do I have to do?

Retailers must provide the procedures, tools, supplies and trained staff to be able to respond to a body fluid spill in any area of their facility to protect potential contamination of food products, food contact surfaces, and any people in the area (employees, visitors, contractors, or shoppers). The written procedures must meet local regulatory requirements (from both a food contamination such as from food pathogens or person contamination from bloodborne pathogens through an occupational hazard). The retailer must provide the tools (recommended to be dedicated and disposable) or clean up or spill kits to effectively clean the bodily fluid spill. All personnel who are tasked with performing these procedures must be adequately trained and shown to be competent to perform these procedures.

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15.3.1.4 Auditing Guidance

This element will be initially audited as part of the desk audit to review the written procedures to ensure they meet the local legislative requirements. This element will also be audited as part of each facility audit through observation and interviews with operational staff. Evidence may include:

- Available written procedures and available to staff who would perform these procedures;
- Observation of spill kits;
- Training records for appropriate staff and sign off for competency

15.3.2 Personal Hygiene, Protective Clothing and Health Standards

15.3.2.1 Personnel

What the SQF Code says

15.3.2.1.1 Personnel suffering from infectious diseases or are carriers of any infectious disease shall not engage in product handling or processing operation.

15.3.2.1.2 Personnel with exposed cuts, sores or lesions shall not be engaged in handling or processing products or handling primary packaging materials or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a waterproof bandage with bandaged area on hands or arms covered using protective sleeve, disposable gloves, etc.

15.3.2.1.3 Smoking, chewing, eating, drinking or spitting is not permitted in any food processing or food handling areas.

15.3.2.1 Implementation Guidance

What does it mean?

In many jurisdictions, personnel requirements in retail establishments are covered by food safety legislation. Where this applies, the legislative requirements must underpin the requirements of this element. This element covers the basic personal hygiene requirement for working in a food retail facility.

What do I have to do?

In high risk areas of the retail facilities, e.g., those areas that handle or process food that will support the growth or formation of pathogenic microorganisms or toxins, medical screening (obvious signs of food related illness as designated by local regulation) of staff and contractors must be undertaken to detect carriers of infectious diseases. Staff identified as carriers of infectious diseases are not to be permitted to handle raw materials, work in progress, or finished product. The retailer must have policies in place to where employees must self-report to their supervisors when they have obvious signs of illness that might be contagious through the people they are around or through the food or contact surfaces they touch. Retail supervisors must not let ill workers work in areas where there is open exposed food to prevent food contamination.

Employees must be aware of risks to the food products from the potential transmission of pathogens from ill employees. An example of a control program could be the removal of an employee from direct food contact to non-food contact activities when the employee reports potential illness. Ideally, an employee will not be penalized for reporting illness to the facility. This will be supported by introductory training with all employees on reporting illnesses and a questionnaire on illnesses for visitors. Retailers must also consider refresher training to ensure all employees are aware of their responsibilities to report illness and to not be a source of food contamination.

Staff members in food facilities with exposed cuts are not permitted to handle products unless suitable protective coverings are applied. These coverings must be monitored regularly by responsible personnel to ensure they remain effective. Bandages are to be brightly colored to ensure they can be easily seen.

Dressings on hands and fingers are required to be covered with a suitable glove. Powdered gloves are not allowed to be worn.

Smoking, eating, chewing and drinking are not permitted in food handling or processing areas. A risk analysis for drinking water must be conducted and controls must be developed by the facility to minimize the risk to the safety of the product if it is provided in a handling or processing area. If water is consumed in the processing area, it is recommended that employees wash hands before returning to their station.

15.3.2.1 Auditing Guidance

Medical screening and personal hygiene policies and procedures shall be reviewed at the initial desk audit, and the effective implementation checked at each facility audit through observation, review of

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records and interviews with staff. SQF auditors will question employees on hygiene practices to ensure they are understood and applied. Evidence may include:

- Medical screening and personal hygiene policies and procedures are in place;
- Medical screening and personal hygiene policies and procedures are effectively implemented;
- Employees notify the business of illness;
- Personnel who are engaged in product handling and exhibit signs of illness are redeployed to low risk areas;
- Personnel who are known to have been ill with an infectious illness are not involved in food processing;
- Personnel sores or cuts on hands are redeployed to low risk areas or have cuts suitably bandaged and gloved;
- Bandages provided to staff are brightly covered and have a metal strip (where metal detection is used);
- There is no smoking, eating or drinking in food product processing or handling areas.

15.3.2.2 Handwashing

What the SQF Code says

15.3.2.2.1 Hand wash basins shall be conveniently located and in accessible locations throughout food handling and processing areas as required.

15.3.2.2.2 Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with:

- i. A potable water supply at an appropriate temperature;
- ii. Liquid soap contained within a dispenser;
- iii. Paper towels in a dispenser; and
- iv. A means of containing used paper towels.

15.3.2.2.3 A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.

15.3.2.2.4 Personnel shall have clean hands and hands shall be washed by all personnel, including staff, contractors and visitors:

- i. On entering food handling or processing areas;
- ii. After each visit to a toilet;
- iii. After coughing, sneezing, using a handkerchief or disposable tissue, smoking, eating, or drinking;
- iv. During food preparation, as often as necessary to remove soil and contamination and to prevent cross contamination when changing tasks;
- v. When switching between working with raw food and working with ready-to-eat food;
- vi. Before donning gloves to initiate a task that involves working with food;
- vii. After handling soiled equipment or utensils; and
- viii. After engaging in other activities that may contaminate the hands.

15.3.2.2.5 When gloves are used, personnel shall maintain the hand washing practices outlined above.

15.3.2.2 Implementation Guidance

What does it mean?

In all food retailing facilities, employees, contractors and visitors must have clean hands upon entering food handling or processing areas; after each visit to a toilet; after using a handkerchief; after smoking, eating or drinking; and after handling wash down hoses, dropped product or contaminated material. Hand wash stations must therefore be correctly equipped and available at convenient locations for use.

What do I have to do?

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Hand wash basins must be provided in close proximity to pedestrian entry points at each area of the facility, with instructions for all staff, contractors and visitors to wash hands immediately before entering the processing area. Additional hand wash basins are required where hands could become contaminated prior to working with product. It is important to consider employee convenience and typical human behaviour when deciding to place hand wash stations in the facility.

Potable water at a suitable temperature, liquid soap, single-use paper towels and a means of disposing of used paper towels need to be provided at each station. Hands-free operated taps and hand sanitizers are also required for high risk operations. Hands-free operated taps can include foot, knee or elbow operated handles, auto-sensing devices or any other method that does not require the user to touch the handle with their washed hands to turn it off.

Hand sanitizers after washing hands for low risk processes are optional.

Where alternative methods of hand-drying are preferred (e.g. high-speed air dryers). Their use must be justified and their effectiveness validated.

Hand-wash basins are to be constructed of stainless steel or similar non-corrodible material. Hand-wash basins constructed of porcelain or similar materials must be located at a distance from food handling areas.

15.3.2.2 Auditing Guidance

The location and construction of hand-wash stations and their use by staff, contractors and visitors shall be reviewed at each facility audit. Evidence may include:

- Hand wash basins are available for staff, contractors, and visitors;
- Hand wash basins are located at personnel access points and areas where hands could become contaminated;
- Hand wash basins are constructed of an appropriate material;
- Hand wash basins have potable water supplied at appropriate temperatures;
- There is liquid soap available at hand wash stations;
- There are paper towels available at hand wash stations;
- There are containers for used paper towels at hand wash stations;
- There is signage near hand wash stations instructing people to wash their hands;
- There are hands-free taps at hand wash stations in high risk areas;
- There is hand sanitizer at hand wash stations in high risk areas;
- Personnel in food handling areas have clean hands;
- Personnel wash their hands on entering processing areas;
- Personnel wash their hands on leaving toilet areas;
- Personnel wash their hands on leaving the lunch room;
- Personnel wash their hands after handling food products, hoses or waste;
- Personnel wash their hands after eating, drinking or smoking;
- Personnel who use gloves also follow hand washing requirements.

15.3.2.3 Clothing

15.3.2.3.1 Clothing worn by staff engaged in handling food shall be cleaned, stored, laundered and worn so as not to present a contamination risk to products.

15.3.2.3.2 Staff engaged in high risk areas shall don clean protective outerwear when entering high risk areas.

15.3.2.3.3 Clothing including shoes shall be clean and maintained in a serviceable condition. Excessively soiled clothing shall be changed where they present a product contamination risk.

15.3.2.3.4 Disposable gloves and aprons shall be changed as needed to prevent cross contamination. Non-disposable aprons and gloves shall be cleaned as required.

15.3.2.3 Implementation Guidance

What does it mean?

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Uniforms that are provided to employees in food retailing facilities are primarily for the protection of food, raw materials, ingredients, finished product and food-contact surfaces. Clothing must therefore be designed to prevent contamination and maintained in a clean and serviceable condition.

What do I have to do?

Employees and visitors must wear clean clothing and footwear while in the food handling or processing areas. Employees and visitors with excessively soiled clothing are not to handle products or packaging materials. In high risk areas, employees must not wear processing uniforms off site. Employees engaged in low risk processes can wear uniforms off site provided they are properly cleaned and verified as clean at the beginning of their work operation.

Clothing includes outer garments such as work clothes, overalls, boots, shoe coverings, head coverings, hair nets, smocks, frocks, beard nets and coats (to include hooded sweatshirts). When required, gloves and aprons shall be kept in an intact and sanitary condition when used. When not in use, gloves and aprons shall be stored in a designated area (e.g. such as a clean rack or locker), not on products or equipment.

Disposable gloves shall be removed before each break, changed upon re-entry into the processing area and when damaged. Employees must comply with hand washing practices even when gloves are used.

Any disposable clothing must be changed between breaks, upon entry into processing areas and when damaged. This includes aprons, frocks, smocks, boots, gloves, etc. When clothing is to be reused, it must be properly cleaned and stored on clean racks or hangers. It cannot be stored on boxes, product or packaging materials. Hairnets and beard nets are to be worn by employees working on the packing or processing line or who work around exposed product.

15.3.2.3 Auditing Guidance

Company policies on clothing, including uniforms, gloves, hairnets, beard nets and footwear shall be reviewed at the initial desk audit. Clothing worn by staff, contractors and visitors (where appropriate) shall be reviewed at each facility audit through observation and interview. Evidence may include:

- Company policies on clothing including uniforms, gloves, hairnets, beard nets and footwear are in place and are appropriate for the type of operation;
- Company clothing policies are implemented by all staff;
- Clothing provided to staff is appropriate and properly maintained;
- Clothing worn by staff is clean;
- Clothing worn by staff in high risk areas is not worn off-site;
- There is clean or temporary clothing available for staff in high risk areas;
- Items such as hair nets, beard nets and disposable gloves are available at accessible locations;
- Clothing designations (e.g. color coding) for high risk/low risk areas are fully implemented;
- Clothing requirements for contractors and visitors are followed:
- Staff clothing is clean at the start of each shift;
- Staff clothing is changed when excessively soiled;
- Disposable gloves, hairnets and beard nets are correctly disposed of;
- Non-disposable gloves and/or aprons are properly cleaned between uses.

15.3.2.4 Jewelry

What the SQF Code says

15.3.2.4.1 Jewelry and other loose objects worn on hands and arms shall not be worn or taken into a food handling or processing operation or any area where food is exposed. The wearing of plain bands with no stones and medical alert bracelets that cannot be removed can be permitted, however the store will need to consider the applicable food legislation.

15.3.2.4 Implementation Guidance

What does it mean?

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Loose pieces of jewelry can fall into exposed food products and cause a choking hazard or cause injury to consumers. Also, pathogenic bacteria can multiply in the warm, humid areas under watchbands, rings and bracelets.

The application of the jewelry policy in food retailing is therefore dependent on the risk to the product and exposure to the product. In high risk processes, or those where product is exposed, company policies shall require the removal of all jewelry and loose objects prior to entering the food handling or processing areas.

What do I have to do?

Jewelry and other loose objects, including watches, worn or carried, must comply with local regulatory authority and proper employee hygiene practices. If such hand jewelry cannot be removed, it may be covered with material which can be maintained intact, in a clean and sanitary condition and which effectively protects against the contamination by these objects to the food, food-contact surfaces or food-packaging materials. Facilities can adjust their good employee hygiene practices based on local regulatory requirements, risk to their product, product exposure and processing conditions.

15.3.2.4 Auditing Guidance

As with clothing, company policies on jewelry shall be reviewed at the initial desk audit, and the implementation of that policy reviewed at each facility audit through observation and interview. Evidence may include:

- The jewelry policy is appropriate to the risk, product exposure and processing conditions;
- The jewelry policy is effectively implemented for staff, contractors and visitors.

15.3.2.5 Visitors

What the SQF Code says

15.3.2.5.1 All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any food processing or handling area.

15.3.2.5.2 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed.

15.3.2.5.3 Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all hand washing and personnel practice requirements.

15.3.2.5 Implementation Guidance

What does it mean?

A visitor is considered a non-employee of the company or facility. Examples of visitors would be vendors, service providers, contractors, truck drivers, tours and guests. Some facilities may define visitors to include anyone who does not work in the facility, thus, corporate personnel could be considered visitors.

Visitors pose the same risk to product safety as company staff and in some cases a greater risk because they may not understand the operation or food hygiene requirements.

When we talk about visitors in this element, we are talking about people who visit the food handling or processing areas within the facility. We are not talking about those who are shoppers who might use a self-serve food area or are shopping at the deli, bakery, or produce departments. The facility must put into place the appropriate protocols to protect foods in the food handling and processing areas for visitors and protocols to protect food from shoppers in those areas where shoppers are a risk to product food safety (such as sneeze guards at self-serve buffet style food displays like a salad bar).

What do I have to do?

The requirements for visitors in food retailing are dependent on the risk to the product, exposure to the product and the proximity of visitors to the process. In high risk areas, or those where product is exposed, visitors must follow exactly the same provisions as staff.

The facility shall have specific good hygiene practices for visitors and shoppers; have a means to communicate those expectations to all visitors and shoppers; and monitor all visitors and shoppers to ensure they are in compliance with the company's good hygiene practices. All visitors entering food handling and processing areas are required to wear clean clothing and foot wear, and must remove jewelry and other loose objects, including watches that may fall into product or onto equipment.

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Visitors shall enter and exit product handling and processing areas through designated staff entrance points and must comply with all hand washing and personal requirements. Visitors must not be permitted to handle any product or equipment unless deemed competent and approved by facility leadership.

Visitors who enter food handling and /or processing areas shall sign in the visitor log and shall be accompanied at all times in these areas by a company employee. For their personal safety, as well as the security of the product and process, they cannot be unsupervised in those areas.

15.3.2.5 Auditing Guidance

The company policy on visitors shall be reviewed at the initial desk audit and the implementation of that policy reviewed at each facility audit through observation and interviews. As someone external to the company, the auditor will be able to partly ascertain compliance by their personal experience on entering the facility. Evidence may include:

- The visitor policy is appropriate to the risk, product exposure and processing conditions and the type and number of visitors visiting the site;
- The visitor policy is effectively implemented for contractors, and visitors.

15.3.2.6 Personnel Processing Practices

What the SQF Code says

15.3.2.6.1 All personnel engaged in any food handling, preparation or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices:

- i. Personnel entry to processing areas shall be through the personnel access only;
- ii. When handling food, personnel shall keep their fingernails trimmed, filed, and maintained so the edges and surfaces are cleanable and not rough;
- iii. Unless wearing intact gloves in good repair, the wearing of false fingernails or fingernail polish is not permitted when handling food;
- iv. Packaging material, product, and ingredients shall be kept in appropriate containers as required and off the floor;
- v. Load limit and maximum capacity lines shall be adhered to in open temperature controlled display units;
- vi. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate;
- vii. Staff shall not eat or taste any product being processed in the food handling/contact zone, except as noted in section 15.3.2.6.2

15.3.2.6.2 In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone the site shall implement proper controls and procedures to ensure:

- i. Food safety is not compromised;
- ii. Sensory evaluations are conducted by authorized personnel;
- iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations;
- iv. Sensory evaluations are conducted in areas equipped for the purpose; and
- v. Equipment used for sensory evaluations is sanitized, maintained and stored separate from processing equipment.

15.3.2.6 Implementation Guidance

What does it mean?

Proper product handling practices combined with sanitary conditions result in:

- Extended storage life of product retail processed products;
- Reduced risk of product contamination; and
- Fewer product returns or complaints.

While management has overall responsibility for ensuring that sanitary processing practices are adopted, and for establishing hygiene procedures, food retail operators have a responsibility for ensuring these procedures are carried out properly and effectively.

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What do I have to do?

Management must develop a list of good hygiene practices of “dos and don’ts.” This will be part of the documented procedures and work instructions. All staff, contractors, and visitors (where applicable) must be made aware of these requirements before entering the site.

The site shall have designated access points for personnel to enter and exit. This is particularly important in high risk areas where product is exposed and when specific entry conditions apply.

Access points are defined as dock doors, pedestrian doors, office doors and any door that enters into the site from the outside or from a lower risk area to a high risk area. All processing areas must have areas for employees to be able to wash their hands upon entry into processing and exposed food handling areas.

Appropriate containers for waste storage are containers that are considered easily cleanable, properly labelled, not absorbable and designed for the purpose. No packaging or ingredient container is to be used for the storage of waste or scrap. Waste containers are to be clearly labelled or designated as waste in languages relevant to the employee workforce.

Where sensory analysis is conducted within processing area, the retailer is to develop specific hygiene practices that are intended to control food safety risks to the product and be consistent with those defined within this section.

15.3.2.6 Auditing Guidance

Written good retail and hygiene practices will be reviewed as part of the initial desk audit. Subsequently, this element will be audited as part of each facility audit through observation and interviews with operating personnel. Evidence may include:

- Good hygiene practices have been developed;
- Staff are aware of the company’s good hygiene practices;
- Staff adhere to the company’s good hygiene practices;
- All exterior doors have protective controls in place;
- Doors or access points between low risk and high-risk areas have no protective controls in place;
- Hand wash stations are available at designated access points;
- Employees, contractors and visitors wash their hands at designated access points;
- Employees, contractors and visitors follow hygiene protocols when entering high-risk areas;
- Employees do not wear false fingernails in food handling areas;
- Food products or ingredients are stored in appropriate containers and not on the floor;
- Packaging materials are stored appropriately and not on the floor;
- Waste containers are properly identified;
- Waste is not left to accumulate in waste containers and is removed at appropriate intervals;
- Sensory evaluations are conducted as per company protocols;
- Sensory evaluations do not compromise food safety or product integrity;
- Sensory evaluation equipment is cleaned and sanitized after use;
- Wash down hoses are stored correctly and not left on the floor.

15.4 Storage, Transport & Separation of Functions

15.4.1 Physical, Chemical and Biological Product Contamination Risk

15.4.1.1 Cold Storage, Freezing, Chilling and Hot Holding of Foods

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What the SQF Code says

15.4.1.1.1 The site shall provide confirmation of the effective operational performance of freezing, chilling, cold and hot holding storage equipment. Coolers, Freezers, blast freezers and hot holding equipment shall be:

- i. Designed and constructed to allow for the hygienic and efficient temperature control for safety of food;
- ii. Load limits and maximum capacity clearly marked and adhered to; and
- iii. Easily accessible for inspection and cleaning.

15.4.1.1.2 Sufficient capacity shall be available to chill, freeze, store chilled, store frozen or hold hot the maximum anticipated throughput of product with allowance for periodic cleaning of equipment areas.

15.4.1.1.3 Discharge from condensate lines shall be controlled and discharged to the drainage system.

15.4.1.1.4 Freezing, chilling, cold and hot holding equipment shall be fitted with temperature monitoring equipment using temperature measurement device that is easily readable and accessible.

15.4.1.1.5 Loading, transporting and unloading dock areas shall be designed to protect the product during loading transporting and unloading.

15.4.1.1 Implementation Guidance

What does it mean?

Freezing with frozen cold storage apply to the process of reducing product temperatures down to sub-zero temperatures for freezing and storage of the product at that temperature for preservation. Ideally, frozen food is stored at less than -18°C (0°F).

Chilling refers to the process of reducing the temperature of a high-risk food to 0 - 5°C (32 - 40°F), and storing within that temperature range, to minimize pathogen growth and extend shelf-life.

In both cases, the equipment required to chill, freeze or store product must be effective and provide for the maximum throughput.

What do I have to do?

Refrigeration equipment shall have the capacity to maintain an ambient temperature at or below 5°C (40°F) except when loading or unloading product from the cooler unless other temperatures are prescribed by legislation. During these operations, the ambient temperature must return to 5°C (40°F) within a short time after access doors are closed.

Freezing and cold storage equipment shall have the capacity to maintain a product temperature below -15°C (5°F) and must be maintained during loading and unloading.

A description of the refrigeration capacity needs to be included in the site plan. Verification may be demonstrated through historical temperature recordings.

Refrigeration facilities will be capable of reducing temperatures of product at rates suitable to maintain food safety or as prescribed by legislation appropriate to the commodities being handled or processed. Documentation of floor materials shall be included in the site plan or description of the handling/processing area. A written SOP shall address the timely and effective removal of water or excessive ice build-up. Dense waterproof concrete is the material generally used for flooring and needs to be smooth and graded to reduce water accumulation.

The tops of refrigerated rooms are to be covered with a rodent-proof material. Inaccessible cavities need to be sealed to prevent the access of rodents or other pests. Storage racks and shelving need to be constructed of a non-corrosive material and easily cleanable. The product on these racks or shelves should be at least 30 cm (twelve inches) from walls and 150 mm (6 inches) off the floor to prevent contamination and allow for adequate air circulation around the product.

Condensation from cooling equipment must be piped to the facility drainage system or to the exterior of the building in a manner which does not create pools or standing water. When defrosting refrigeration units in a product handling or processing areas, it is necessary that the timing of the defrosting be such that it does not pose a threat to the sanitary conditions of the area or product.

Monitoring and validation of the cooler temperature shall be done in accordance with the site's Food Safety Plan or similar document. The site shall be able to verify and validate cooling or storage temperatures prescribed by legislation. Manual monitoring of cold storage rooms on a predetermined frequency is acceptable provided there is a justification in place for the frequency and documentation is kept on file with corrective actions, if applicable.

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Where open docks exist, products are to be unloaded in a manner which protects the premises, the product and/or packaging from inclement weather, pests and temperature abuse.

15.4.1.1 Auditing Guidance

Cold storage, freezing, and chilling procedures (SOPs) and temperature validation procedures will be reviewed as part of the initial desk audit. Subsequently, they will be audited as part of each facility audit through observation, review of records and interviews with refrigeration mechanics and operating personnel. Evidence may include:

- SOPs exist for chilling, freezing and cold storage;
- SOPs exist for validation of chilled and frozen temperatures and times;
- Supplier can confirm the effective operation of the chillers/freezers;
- Supplier can confirm the effective operation of the chilled and cold storage rooms;
- Cold storage rooms are properly designed and constructed;
- Cold storage rooms are easily cleaned;
- Cold storage areas are easily accessible for inspection;
- There is adequate refrigeration capacity;
- There is adequate freezer capacity;
- There is no condensation in the cold storage area;
- There is no frost or ice build-up in the cold storage area;
- Defrost water is discharged appropriately.
- Temperature monitoring is adequate;
- Temperature records are retained;
- Unloading docks are adequately designed to protect product and product temperature.

15.4.1.2 Storage of Dry Ingredients, Packaging and Shelf Stable Packaged Goods

What the SQF Code says

15.4.1.2.1 Rooms used for the storage (including sales display) of products, raw materials, ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration.

15.4.1.2.2 Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be constructed to prevent packaging from becoming a harborage for pests.

15.4.1.2.3 Vehicles used in food contact, handling or processing zones or in cold storage rooms shall be designed and operated so as not to present a food safety hazard.

15.4.1.2 Implementation Guidance

What does it mean?

Rooms where materials, ingredients, packaging and other dry goods - apart from hazardous chemicals, (refer 15.4.1.2.) are stored, must be clean, dry and accessible.

What do I have to do?

Ingredients, raw materials, and packaging materials must be stored in designated storage areas which protect the materials from contamination and deterioration. These materials shall be stored only in dry areas of the handling or processing rooms when staged for use during processing or packing. Ensure that

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packaging storage areas are adequately protected from the elements, rodents and other pests. Packaging materials which become food contact surfaces must be protected from dust and other contaminants while in storage. This can be accomplished by the use of plastic wrap or other means to protect the packaging material.

Retailers must also be aware of the need to segregate identity preserved products (such as organic products from non-organic products in food areas like salad bars, etc.) and in particular materials and products containing allergens (refer 15.4.3.1.). These materials may require separate, dedicated storage rooms.

Materials used in the construction of storage rooms must comply with 15.2.1. and light fittings in storage areas must comply with 15.2.1.4.

The racks provided for the storage of packaging shall be constructed of impervious materials and designed to be easy to clean. The retailer must limit the use of wooden racks for storage of packaging and packing materials to dry areas only. Stands and the lower shelves of stands should be at least 150 mm (6 inches), or as required by applicable regulation above floor level to facilitate proper cleaning.

Fork lifts, hand-forks and other vehicles used in storage areas must be safe to use, hydrocarbon emissions must be controlled and operated in a manner that does not cause damage to product and equipment.

15.4.1.2 Auditing Guidance

This element will be audited as part of each facility audit through observation and interviews with operational staff. Evidence may include:

- Product storage rooms are located away from wet processing areas;
- Storage rooms are adequately designed to protect product, ingredients, materials, or packaging materials;
- Packaging racks are made of material that is easily cleanable;
- Packaging racks allow access to floor/wall junction for cleaning;
- Vehicles used in food processing, storage or cold storage areas release hydrocarbon emissions or present a hazard to food product, ingredients, materials or packaging materials.

15.4.1.3 Storage of Equipment and Containers

What the SQF Code says

15.4.1.3.1 Storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.

15.4.1.3 Implementation Guidance

What does it mean?

Rooms and areas designated as storage areas for equipment, tools, utensils and re-useable containers must be designed and constructed to protect clean equipment and not become a source for contamination to products handled or processed within the facility.

What do I have to do?

Materials used in the construction of storage rooms must comply with 15.2.1. and light fittings in storage areas must comply with 15.2.1.4.

Equipment storage rooms may be adjacent to equipment cleaning areas but kept separate to ensure there is no commingling of dirty and cleaned tools, utensils and equipment.

Racks are to be provided to ensure tools and equipment are not stored on the floor.

15.4.1.3 Auditing Guidance

This element will be audited as part of each facility audit through observation. Evidence may include:

- There is a dedicated storage area for clean tools, utensils and equipment;

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- The equipment storage area does allow access for cleaning;
- The equipment storage area protects equipment during storage.

15.4.1.4 storage of Hazardous Chemicals and Toxic Substances

What the SQF Code says

15.4.1.4.1 Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to staff, product, packaging, product handling equipment or areas in which the product is handled, stored, sold or transported.

15.4.1.4.2 Processing utensils and packaging shall be stored as not to allow for cross-contamination by hazardous chemicals and toxic substances.

15.4.1.4.3 Daily supplies of chemical used for continuous sanitizing of water or as a processing aid, or for emergency cleaning of food processing equipment or surfaces in food contact zones, may be stored within or in close proximity to a processing area provided access to the chemical storage facility is restricted to authorized personnel.

15.4.1.4.4 Pesticides, rodenticides, fumigants and insecticides shall be stored separate from sanitizers and detergents. All chemicals shall be stored in properly labeled containers.

15.4.1.4.5 Hazardous chemical and toxic substance storage facilities shall:

- i. Be compliant with national and local legislation and designed such that there is no cross-contamination between chemicals;
- ii. Be adequately ventilated;
- iii. Be provided with appropriate signage indicating the area is a hazardous storage area;
- iv. Be secure and restrict access only to authorized personnel;
- v. Have appropriate safety data sheets (SDS) available;
- vi. Have instructions on the safe handling of hazardous chemicals and toxic substances readily accessible to staff;
- vii. Have suitable first aid equipment and protective clothing available in close proximity to the storage area;
- viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and
- ix. Be equipped with spillage kits and cleaning equipment.

15.4.1.4.6 Hazardous chemicals and toxic substances offered for sale shall be handled, stored, displayed and delivered to prevent risk of cross-contamination and cross-contact of food products.

15.4.1.4 Implementation Guidance

What does it mean?

Cleaning chemicals, pesticides, agricultural chemicals, lubricants, oil, grease, boiler chemicals, etc. plus any other toxic substances must be stored in designated separately secure storage areas.

What do I have to do?

There must be clearly visible means of separation of these groups of chemicals or toxic substances. They must not be stored on the same shelf or above each other on the same rack. Pest management chemicals shall be stored separate from cleaning chemicals and separate from engineering chemicals. Bulk containers of hazardous chemicals or toxic substances must have sufficient spill-proof procedures that ensure that no cross-contamination can occur. There must be signage indicating this area is a hazardous chemical storage area.

Chemical delivery systems installed in processing areas will be clearly labelled to identify their use and all chemical containers connected to these systems will remain connected while in use and identified through proper labels. Only personnel who have been properly trained in the use of the system will be authorized for access and use of the system.

Chemical storage areas must comply with local or national regulations, be designed to contain spillages, and be ventilated, secure and lockable. Only approved and authorized chemicals are to be stored.

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Chemicals must be stored in their original containers or transferred to specifically designed bulk storage units that are correctly labeled. Any chemicals transferred to secondary containers must have the appropriate secondary chemical label attached. Most chemical supply companies will provide secondary chemical labels for this purpose.

Utensils, tools or equipment used for food product must not be stored in the same room as hazardous chemicals.

The retailer must ensure that Safety Data Sheets (SDS) are readily available and accessible to personnel handling or coming into contact with hazardous chemicals. The retailer must also ensure that personnel have been trained in the safe handling and use of all hazardous chemicals in use on site as required by legislation.

15.4.1.4 Auditing Guidance

This element will be audited as part of each facility audit through observation and interviews with operators, cleaners and pest control personnel. Evidence may include:

- There is one or more designated storage rooms for storing of chemicals;
- Chemical storage rooms are correctly designed and constructed, and meet regulatory standards;
- Chemical storage rooms are ventilated, secure and lockable;
- Only authorized chemicals are stored;
- There is appropriate signage indicating the area as a hazardous storage area;
- The chemical storage areas are separate from food production areas;
- There is spill control and spill kits available in the chemical storage rooms;
- There are no food processing tools, utensils or equipment stored with hazardous chemicals;
- Daily/shift supplies of chemicals are stored correctly;
- Packaging is not stored in an area used to store hazardous chemicals;
- Sanitizers and detergents are not stored with other pesticides or other toxic chemicals
- Chemicals are stored in original containers;
- There are instructions on safe handling of chemicals available.

15.4.1.5 Alternative Storage and Handling of Goods

What the SQF Code says

15.4.1.5.1 Where goods described in 15.4.1.1, 15.4.1.2 and 15.4.1.3 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food safety and quality.

15.4.1.5 Implementation Guidance

What does it mean?

There may be times when temporary or overflow storage is required for refrigerated goods, ingredients, packaging materials or chemicals. This must be an occasional occurrence only and must not become the status quo. Temporary storage must be evaluated according to a risk analysis.

What do I have to do?

Where temporary or overflow storage is used, a risk analysis must be undertaken to ensure the stored product is not at risk or pose a risk to any products, processes or personnel. The risk analysis must be documented and be available every time overflow storage is applied.

In particular:

- Frozen or refrigerated product must be held at the required temperature and in clean and sanitary conditions;

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- Dry ingredients, and packaging materials must be held in a dry, clean area that is free from pests;
- Chemicals must be stored in a safe secure area that complies with local regulations and does not pose a risk to personnel or other products.

15.4.1.5 Auditing Guidance

This element will be audited as part of each facility audit through observation and interviews with operators. Evidence may include:

- Alternative storage is being used;
- Risk analysis has been conducted for alternative storage;
- Materials or products are not being stored continuously in temporary storage;
- There is no risk of product contamination from the use of temporary storage.

15.4.1.6 On-Site Laboratories

What the SQF Code says

15.4.1.6.1 On-site laboratories shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel.

15.4.1.6.2 Provisions shall be made to isolate and contain all laboratory waste held on the premises and manage it separately from food waste. Laboratory waste water outlet shall as a minimum be down stream of drains that service food processing and handling areas.

15.4.1.6.3 Signage shall be displayed identifying the laboratory area as a restricted area accessible only by authorized personnel.

15.4.1.6 Implementation Guidance

What does it mean?

On site laboratories are an option based on cost and needs of the retailer. In many cases, outsourcing laboratory services is applicable and reduces the risk of having on-site laboratories. In most instances, testing for monitoring purposes may be carried out in an on-site laboratory, while validation activities are outsourced to an accredited laboratory.

What do I have to do?

This guidance is specific to on-site laboratories only. Laboratories must be located away from any food processing or handling activities or food contact surfaces to avoid contamination. Raw materials, ingredients, work-in-progress, packaging or exposed product shall not be exposed to laboratory waste.

Signage shall be posted at laboratory entrance(s) restricting access to trained, authorized personnel. Signage may consist solely of icons such as those published by the International Association for Food Protection to accomplish these requirements, and other local regulatory requirements must be applied. It is not necessary for the internal laboratory to be accredited to ISO 17025 or equivalent; this is required in the Code for only external laboratories for analysis of water and ice (refer 15.5.1.6.2.); however the testing methods used must be justified and proficiency against an accredited laboratory is recommended to validate the testing methods.

Laboratory waste must be labeled, stored and disposed of separately from food waste. This applies to contained waste and waste flushed to drain. Laboratory waste must not pose a risk for contamination to the products handled or processed at the facility.

15.4.1.6 Auditing Guidance

This element will be audited as part of each facility audit through observation. Evidence may include:

- The on-site laboratory is separated from food processing and handling areas;

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- Laboratory access is restricted to only authorized personnel;
- Laboratory waste is properly treated prior to disposal;
- Laboratory waste is adequately contained and separated from general food waste;
- Adequate signage is available for the laboratory.

15.4.2 Segregation and Cross-contamination

15.4.2.1 Process Flow

15.4.2.1.1 The process flow shall be designed to prevent and/or minimize cross contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.

15.4.2.1 Implementation Guidance

What does it mean?

The layout of process and packing lines must be designed to minimize the potential for contamination from materials, premises, other processes, other parts of the same process, vehicle (e.g. forklift) traffic and pedestrians (e.g. employees, contractors or visitors).

What do I have to do?

The layout of food retailing processes (processing operations like deli, meat, produce, seafood, bakery, etc.) must consider the risks of product contamination and be designed to minimize or eliminate those risks. This is particularly relevant in processes where there is a kill-step or other CCP, and the potential for post-CCP contamination must be considered and avoided.

Process flow considerations may include, but is not limited to:

- Avoiding u-shape, or circular processes where the "clean" or high-risk end of the process can be contaminated by the raw material or "dirty" end of the process (refer 15.4.2.4.);
- Controlling pedestrian walkways to avoid employees walking from the "dirty" to "clean" end of the process;
- Ensuring separation of allergenic materials (refer 15.4.3.);
- Covering exposed product (bins and other containers) to avoid airborne contamination;
- Avoiding equipment bottlenecks, corners or areas where product can be held up or accumulate.

15.4.2.1 Auditing Guidance

This element will be audited as part of each facility audit through observation. Evidence may include:

- Process flow has been designed to minimize the risk of cross contamination;
- The flow of personnel is designed to minimize the risk of cross contamination;
- Post kill-step parts of the process are well protected.

15.4.2.2 Receiving Products

What the SQF Code says

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15.4.2.2.2 Dry ingredients and pre-packaged foods, and packaging shall be received and stored separately from frozen and chilled raw materials and pre-packaged foods to ensure there is no cross contamination. Unprocessed raw materials shall be received and segregated to ensure there is no cross contamination.

15.4.2.2 Implementation Guidance
<p>What does it mean?</p> <p>This element relates to 15.4.1.1. (cold storage), 15.4.1.2. (storage of dry ingredients, packaging). Dry ingredients, raw materials and packaging need to be received and stored separately from frozen and chilled products.</p> <p>What do I have to do?</p> <p>All raw materials and work in progress shall be kept in appropriate conditions as to the type of material.</p> <p>Materials shall be kept dry and free from contamination which may lead to waste of materials and potential hazards in the final product.</p>
15.4.2.2 Auditing Guidance
<p>This element will be audited as part of each facility audit through observation. Evidence may include:</p> <ul style="list-style-type: none"> • Dry materials and packaging are received separately from chilled/frozen materials; • Dry materials and packaging are stored separately from chilled/frozen materials.

15.4.2.3 Thawing of Food

What the SQF Code says

15.4.2.3.1 Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose.

15.4.2.3.2 Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature does not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor.

15.4.2.3.3 Air thawing equipment shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.

15.4.2.3.4 Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.

15.4.2.3 Implementation Guidance
<p>What does it mean?</p> <p>Where food is required to be thawed for processing (e.g. meats or seafood), thawing must be conducted under controlled conditions to ensure consistent and even thawing, including water thawing and air thawing.</p> <p>What do I have to do?</p> <p>Thawing of food (where performed) must be undertaken in a room or in equipment designed and dedicated for that purpose. The room or thawing equipment must be located in close proximity to cold storage to prevent product surface thawing before entering the thawing room or equipment.</p> <p>Thawing may be by water or air. In both instances, the flow must be regulated to ensure an even and consistent thawing process in an environment that does not pose a product risk or expose the food to deterioration. Where water is used, overflow must be directed to drain.</p> <p>Time and temperature of product thawing must be established and validated, as must the shelf life of the food prior to use after thawing.</p>
15.4.2.3 Auditing Guidance
<p>This element will be audited as part of each facility audit through observation. Evidence may include:</p> <ul style="list-style-type: none"> • Time and temperature of the thawing process have been established and validated;

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- Thawing is a controlled process in a custom-designed room;
- Food is thawed in a way that does not pose a food safety or quality risk;
- Water used in water thawing of food is properly disposed of;
- Water used in water thawing is properly cooled;
- Food temperature is monitored during the thawing process;
- Used packaging from thawed food is properly contained and disposed of.

15.4.2.4 High Risk Processing

What the SQF Code says

15.4.2.4.1 The processing of high risk food shall be conducted under controlled conditions such that:

- i. Sensitive areas in which high risk food has undergone a “kill” step, a “food safety intervention” or is subject to post process handling, are protected/segregated from other processes, raw materials or staff who handle raw materials to ensure cross contamination is minimized;
- ii. Areas in which high risk processes are conducted are serviced by staff dedicated to that function;
- iii. Staff access points are located, designed and equipped to enable staff to practice a high standard of personal hygiene to prevent product contamination;
- iv. Processes are in place to reduce or eliminate the risk of cross contamination.

15.4.1.4 Implementation Guidance

What does it mean?

High risk processes are those in which high risk foods are handled, exposed, stored, processed or packed. High risk food is food that may contain pathogenic microorganisms and will support the formation of toxins or growth of pathogenic microorganisms, and has a significant likelihood of growth causing illness or injury to a consumer if not properly produced, processed, distributed and/or prepared for consumption. It may also apply to a food that is deemed high risk by the relevant food regulation or has caused a major foodborne illness outbreak.

This element outlines the specific conditions required in areas where high risk foods are processed or handled.

What do I have to do?

The process flow is particularly relevant for high risk processes where the product is subject to handling or exposure after a “kill-step.” This includes (refer 15.4.2) segregation of the post-process end from the raw material end of the process; controlling pedestrian walkways to avoid personnel contamination; dedicated tools and equipment post-process; dedicated staff servicing the post-process end; and dedicated uniforms for staff working post-process.

The reference to the environmental monitoring program is self-explanatory, but is worth repeating as it is considered essential for areas in which high risk food is processed, handled or exposed.

An environmental monitoring program (EMP) is a program which includes pathogen swabbing to detect risk in the sanitary conditions of the processing environment and is a verification of the effectiveness of the pathogen controls that a management facility has in place for high risk foods (refer Appendix 2: Glossary of Terms).

Swabbing (when accomplished), must include not only the smooth, accessible parts of the process, but also the transfer points, bearings, etc., where product is likely to build up on equipment.

15.4.1.4 Auditing Guidance

Control procedures for high risk areas shall be reviewed as part of the initial desk audit. Subsequently, high risk processes will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- There are control procedures in place for high risk processes;

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- Control procedures are effectively implemented for high risk processes;
- High risk areas are adequately segregated from raw material handling areas;
- High risk areas are only serviced by staff dedicated to that function;
- Post-process areas are not at risk from pedestrian walkways;
- Protective clothing is provided in high risk areas;
- Dedicated tools and equipment are available in high risk areas;
- Product transfer between equipment and between high risk areas and other areas poses no risk to product;
- An effective environmental monitoring program (EMP) is in place;
- The EMP includes a sampling schedule and responsibility for sampling;
- Swabbing includes transfer points and joints in equipment;
- Swabbing records are maintained.

15.4.2.5 Control of Foreign Matter Contamination

What the SQF Code says

15.4.2.5.1 The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented and communicated to all staff.

15.4.2.5.2 Inspections shall be performed to ensure facility and equipment remains in good condition and potential contaminants have not detached or become damaged or deteriorated.

15.4.2.5.3 The use of temporary fasteners such as string, wire or tape to fix or hold equipment shall not be permitted.

15.4.2.5.4 The following preventative measures shall be implemented where applicable to prevent glass contamination:

- i. Containers, equipment and other utensils made of glass, porcelain, ceramics, laboratory glassware or other like material (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers or MIG thermometers required under regulation) shall not be permitted in food processing/contact zones;
- ii. Staples, paperclips, tacks and other metal objects shall not be permitted in food processing/contact zones;
- iii. Conduct regular inspections of food handling/contact zones to ensure they are free of glass or other like material; and
- iv. Inspect all glass, porcelain, ceramics, plastics or other like material used for food display are in good condition and to ensure that they are free of chips and/or cracks that pose a risk to food safety; and
- v. Inspect all glass instrument dial covers on processing equipment and MIG thermometers at the start and finish of each shift to confirm they have not been damaged.

15.4.2.5.5 Wooden pallets and other wooden utensils used in food handling/contact zones shall be clean and maintained in good order. Their condition is subject to regular inspection.

15.4.2.5.6 Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.

15.4.2.5.7 Knives and cutting instruments used in processing and packaging operations shall be controlled, and kept clean and well maintained.

15.4.2.5 Implementation Guidance

What does it mean?

Foreign matter can originate from:

- External sources such as pests, raw material and packaging material (e.g., plastic and/or cardboard embedded in product by a supplier);

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- Internal sources of foreign matter include the building (e.g., rust, insects and insulation), surface coatings (e.g., flaking paint), equipment (e.g., nuts, pins, screws, washers, etc.), glass (e.g., from windows or lightbulbs) and wood (e.g., from pallets or brooms or other equipment).

In all cases, where there is risk for potential foreign matter contamination, procedures must be in place to eliminate or minimize the risk of foreign materials entering the product. The retailer needs to be aware of potential sources of foreign matter contamination, however, customer complaints (refer 2.1.7.5.) may provide an indication of the prevalence and priority.

What do I have to do?

The foreign matter (including glass) protocol must outline the sources of foreign materials, the methods of control and the responsibility for taking action when foreign materials or glass are detected in the manufacturing environment.

The protocol shall include removal of all tools and machine parts from the processing areas when maintenance has been completed (refer 15.2.3.2.) and this shall be implemented and supervised. Facility and equipment must be inspected regularly to ensure it remains in good condition so that nothing has detached, damaged or deteriorated. Personnel must be encouraged to report all recognized sources of potential contaminants. This includes potential deterioration of e.g. metal blades in mixers (bakery) and other areas where metal/metal wear can cause metal swarf to tear off.

Fabricated equipment covers shall be used wherever possible to prevent potential contamination from nuts, bolts, etc. Temporary repairs shall not be utilized within general processing facilities. The use of plastic, tape, string, cardboard or other non-permanent materials as a means to repair or alter the operation or equipment must be avoided. The site shall have included within its maintenance process (refer 15.2.3.) control measures to be taken when repairs are needed during process to protect product from foreign materials that could impact food safety. Containers, equipment and other utensils made of glass, porcelain, ceramics or other like material must not be permitted in any processing or food handling area.

Laboratory staff must replace all laboratory glass containers with plastic containers if possible and avoid using glass instruments in food handling or processing areas. Regular inspections must be made to ensure that these areas are free of glass and staff must be made aware of their responsibility to adhere to the company foreign matter and glass protocol. All overhead lighting must be protected and shielded (refer 15.2.1.4.2.).

The risk assessment of foreign material contamination and preventative controls shall be included within the food safety plan (2.4.1) development. Each site must assess its risks of foreign material contamination to product and develop specific controls within its environment.

Wooden pallets are part of the food industry and are not expected to be banned from processing environments. Depending on the type of operation and the products being produced, the types of controls for the management of pallets can vary from one facility to another. At a minimum, all general processing facilities should have a pallet management program in place where pallets undergo inspection for broken slats or wood pieces protruding which could pose a risk to products. If pallets are stored for prolonged periods outdoor, then the pallets may need to be cleaned and inspected for vermin prior to entry into the processing area.

For high-risk operations and wet processing environments, the use of clean slip sheets or plastic pallets may be utilized to help to minimize the risk of foreign material or microbiological contamination to the products.

Knives and cutting instruments must be counted and controlled and kept clean to avoid cross-contamination.

15.4.2.5 Auditing Guidance

Foreign matter control (including glass) procedures shall be reviewed as part of the initial desk audit. Subsequently, foreign matter control procedures will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Foreign matter control procedures are documented;
- Foreign matter control procedures identify all potential sources of foreign matter contamination;
- Foreign matter control procedures are effectively implemented;
- Foreign matter control procedures include responsibility for foreign matter control;
- Foreign matter control procedures are communicated to staff;
- Inspections are conducted to prevent foreign material contamination of product;
- Temporary repairs are not used within the processing areas or where food is handled or stored;

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- A glass register has been developed;
- The glass register is complete, and covers all glass located at the site;
- The glass register includes brittle plastic and other materials;
- Glass inspections are conducted regularly including instrument dial covers and thermometers;
- Wood used in processing / handling area well maintained and clean;
- There are no loose materials on processing equipment;
- Knives and cutting instruments are clean and sanitized.

15.4.2.6 Detection of Foreign Objects

What the SQF Code says

15.4.2.6.1 The responsibility, methods and frequency for monitoring, maintaining, calibrating and using screens, sieves, filters or other technologies to remove or detect foreign matter shall be documented and implemented.

15.4.2.6.2 If used, metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

15.4.2.6.3 Records shall be maintained of the inspection by foreign object detection devices, and their verification per regulatory requirement.

15.4.2.6 Implementation Guidance

What does it mean?

Foreign matter detectors can include metal detectors, x-ray, color sorters, screens, sieves and filters. They must be designed and installed to detect and/or trap foreign objects that have been identified in a detailed risk assessment. Their management, control, and calibration must be documented in procedures and work instructions which include responsibility and frequency.

What do I have to do?

Specific work instructions must be written on the monitoring of foreign material detection and prevention devices. The frequency of monitoring such devices, the criteria used in monitoring, and the corrective actions to take when foreign materials are discovered, or issues are discovered with the effectiveness of the prevention device must be defined within the methods. For example, if a metal detector must reject three wands (2.0 Fe, 2.5 non Fe, 3.0 SS) to pass, then when all three wands are not rejected, the site must have defined criteria for how such an incident will be handled including product identification and disposition (i.e. if the detector should fail, all product since last good check is placed on hold and must be re-run through a calibrated, working metal detector).

Some examples of frequency of monitoring may be hourly metal detector checks, screen checks once per shift, tailings check daily and filter check once per shift.

Metal detectors, x-ray, color sorters (if used for defects or foreign material) and all other detection devices must be validated to ensure that they can effectively detect a foreign object within the packaged product that is passed through the device. The passing of wands through the device to ensure that it is working is verification. An example of a means for validation of a metal detector could be the placing of a piece of metal within the package of product (product would be marked to ensure it does not enter commerce or be placed for sale). All types of packaging and sizes of product that are passed through the device must be validated as well as all new packaging or size of product.

15.4.2.6 Auditing Guidance

Procedures for foreign object detection devices shall be reviewed as part of the initial desk audit. Subsequently, procedures will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Methods are documented for the monitoring, maintenance or calibration of filters and screens;

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- Responsibility is assigned for the monitoring, maintenance or calibration of filters and screens;
- Methods are effectively implemented for the monitoring, maintenance or calibration of filters and screens;
- Methods are documented for the monitoring, maintenance or calibration of physical contaminant detection devices;
- Responsibility is assigned for the monitoring, maintenance or calibration of physical contaminant detection devices;
- Methods are effectively implemented for the monitoring, maintenance or calibration of physical contaminant detection devices;
- Physical contaminant detection technology is routinely monitored;
- Physical contaminant detection technology is validated;
- Records are maintained of foreign body inspections;
- Records are not maintained of the validation of foreign body detection equipment.

15.4.2.7 Managing Foreign Matter Contamination Incidents

What the SQF Code says

15.4.2.7.1 In all cases of foreign matter contamination the affected batch or item shall be isolated, inspected, reworked or disposed of.

15.4.2.7.2 In circumstances where glass or similar material breakage occurs, the affected area is to be isolated, cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person prior to the commencement of operations.

15.4.2.7 Implementation Guidance

What does it mean?

The site must have established criteria for the identification, isolation and disposition of product affected when a foreign material issue is detected. The retailer must manage the incident with established procedures consistent with element 2.5.2. (Corrections and Preventative Actions).

What do I have to do?

The retailer must have a procedure in place to identify, isolate, inspect and rework or dispose of product that is known to be at risk of foreign matter contamination. This shall include isolation, labeling, quarantine of affected product, and depending on the nature of the suspected contaminant, further inspection or examination of the product to determine the source and extent of the contamination so that a decision can be taken on its disposition.

Where a glass or similar breakage occurs, the procedure must include a glass clean-up process that covers the footprint of the broken and tramped glass. For example, breakage of a light bulb in the deli can spray glass over a wide area. The procedure must include a shut-down of the whole area, and a thorough clean-up to eliminate all broken glass. Brooms, brushes, vacuums and footwear must be included in the clean-up. The area must be thoroughly inspected before recommencing operations. Recommend using disposable clean up tools (such as a Swiffer like pad that can be disposed).

15.4.2.7 Auditing Guidance

The foreign matter control (including glass) procedures shall be reviewed as part of the initial desk audit. Subsequently, the procedure including glass clean-up protocols will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Isolation and rework/disposition is included in the foreign matter control procedure;
- Isolation and rework/disposition is effectively implemented;
- Glass breakage procedure is included in the foreign matter control procedure;

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- Glass breakage procedure includes clean-up of footwear, tools, brooms, brushes and other equipment;
- Glass breakage procedure is effectively implemented.

15.4.2.8 Air Quality

What the SQF Code says

15.4.2.8.1 Compressed air that contacts food or food contact surfaces shall be clean and present no risk to food safety.

15.4.2.8.2 Compressed air systems used in the processing process shall be maintained and regularly monitored for purity.

15.4.2.8 Implementation Guidance

What does it mean?

This applies to compressed air that comes into contact with exposed food product (e.g. blowing open bags), food contact surfaces and interior surface packaging. It does not apply to air that does not come into contact with food or food contact surfaces.

Purity means absence of contaminants that could cause a food safety hazard. Pure air means the air is free of risk for contamination of the products. Essentially, the air must not contribute any contamination to the product.

What do I have to do?

Compressed air can be a source of chemical and microbiological contamination. Potential contaminants can include particulates, including dirt (microorganisms, atmospheric dirt and solid particulates, rust and pipe scales), water (water vapor, condensed liquid water and water aerosols) and oil (oil vapor, liquid oil and oil aerosols).

Food operations must verify and validate that the compressed air used is appropriate and does not serve as a source of contamination. When compressed air comes in contact with exposed product or direct product contact surfaces, the air compressor must use food grade oil.

Preventive maintenance programs need to ensure that an appropriate filtration program is in place at the point of use and the filters are cleaned or changed at a frequency appropriate to the product and process or following any maintenance to air supply source or equipment. Any maintenance must be done in a hygienic manner.

Wherever the compressed air comes in contact with the food, either directly or indirectly, high efficiency filters are to be in place at point-of-use where the air enters the final section of tubing (not in the compressor room). This will significantly reduce the risk of microbial contamination of the food from the air. The recommended final stage of filtration in these food contact areas should have a rating of 0.01 micron with an efficiency of 99.999% (or as determined by appropriate risk analysis). Sufficient filtration is to be in place directly upstream of the final stage to protect the final stage from oil and water aerosols.

Nozzles and air hoses are to be in good condition, properly repaired and maintained in a hygienic state (e.g., cleaned and sanitized). Hoses and nozzles are to be kept off the ground.

It is generally advisable to locate the filtration as close as practically possible (near the "point of use," or the point where air contacts the food), so as to not have long lengths of piping/tubing between the microbial removal filter and the air/food contact point.

Testing can be conducted to validate the compressed air-filtration control system's effectiveness based on the risk to the product; however, testing must be conducted at a minimum of once a year. Testing can be done in-house or by a contracted party. Test requirements and number of samples will be based on the risk to the product and process. Microbiological testing can include testing for aerobic plate count and/or indicator organisms as appropriate to the operation. Testing for moisture is to be considered if moisture is a potential risk to the product (e.g., dry operations).

Aseptic sample collection needs to be used. There are a wide variety of measures available, including the use of air sampling equipment, use of sterile sponges, membrane filtration and others.

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The site may consider the following controls for particulates

- i. Intake filters to remove atmospheric dirt and solid particulates.
- ii. Microorganisms – A point-of-use filter, minimum 0.01 micron, prevent pathogenic microorganisms from contaminating food. An effective PM program should be in place to maintain the integrity of the filter. Validation from the filter manufacturer is often considered adequate validation.
- iii. Water, including vapor, liquid, condensed. A dryer in the compressed air system provides effective control. An effective PM program should be in place.
- iv. Oil, including vapor, liquid and aerosols. The presence of coalescing filters in the compressed air system effectively removes contamination. An effective PM program should be in place to maintain the integrity of the filter.

Industry Standards of Reference:

For general compressed air quality standards within a food plant, ISO 8573-1 standards are a very good reference. These standards provide a good baseline for quantifying compressed air quality relative to moisture, oil content (carryover from compressor), as well as general particulate contamination. ISO 8573-1 does not, however, provide guidance for microbial contamination. For areas where the compressed air comes in direct contact with food or food contact surfaces, ISO 8573-7 provides a standardized method for collecting compressed air samples for microbial testing; however, it leaves the user to determine the acceptable type and level of CFU content.

15.4.2.8 Auditing Guidance

Air quality program and test procedures will be reviewed as part of the initial desk audit. Subsequently, this element will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- The condition of air compressors and compressed air used to transport product, or otherwise to come into contact with exposed product, product contact surfaces or packaging materials;
- Compressed air that is in contact with food is filtered in accordance with the site's risk assessment or otherwise treated;
- Filters are checked or changed at a frequency based on the air quality program;
- The site has a standard for microbiological purity of compressed air that contacts foods as well as a process for testing;
- Maintenance staff has the data specification sheet for the filter housing;
- Follow up with preventative maintenance and SSOPs;
- Performance characteristics of the filter in place must match the risks identified in the site's assessment.
- Identification of the level of filtration at the point-of-use for commercially sterile air.
- Compressed air that is in contact with food is checked for purity using methods and at a frequency based on the air quality program and test procedures.

15.4.2.9 Loading, Transport, and Unloading Practices

What the SQF Code says

15.4.2.9.1 The practices applied during loading, transport and unloading of food shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported and unloaded under conditions suitable to prevent cross contamination.

15.4.2.9 Implementation Guidance

What does it mean?

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The duty of assuring food safety of the retailer's product continues from when ingredients and materials are first unloaded at the site through when the finished product is placed into storage and loaded into display cases or offered ready for sale. Loading (if product is sent to another location), unloading and distribution procedures must be documented and implemented.

What do I have to do?

Conditions for storage, loading and unloading will vary depending on the type, nature and temperature of the commodity. Documented procedures must cover each type (e.g., bulk, bagged, packaging, refrigerated and frozen) of product delivered into or out from the site.

Some retailers have their own transport, some retailers use contract transport. Where contract services are used, the transport protocol will be referenced in the contract with the provider.

15.4.2.9 Auditing Guidance

Transport (i.e., loading, unloading and distribution) procedures will be reviewed as part of the initial desk audit. Subsequently, this element will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Methods used to load and unload materials and products are documented:
- Methods used for the transportation of products are documented;
- The documented methods adequately protect the product;
- The documented methods are effectively implemented.

15.4.2.10 In-Store Sampling

What the SQF Code says

15.4.2.10.1 The organization shall have a policy for in-store sampling of food products and shall be documented, implemented and designed to maintain food safety and regulatory compliance.

15.4.2.10 Implementation Guidance

What does it mean?

The duty of assuring food safety of the retailer's product continues when the finished product is prepared for consumption by a vendor or employee and offered as a sample to consume and other product is ready for sale.

What do I have to do?

Conditions for preparation for consumption will vary depending on the type, nature and temperature of the product. Documented procedures must cover each type (e.g., dry, refrigerated and frozen) of product prepared (such as cooked), demonstrated or offered as a sample to consumers in the facility. The procedures must address the food safety controls for all risks to the consumer. It must consider the communication of allergens in the product to the consumers the product is offered to during the sampling event.

15.4.2.10 Auditing Guidance

Product sampling and demonstration procedures (i.e., preparing, cooking, demonstrating etc.) procedures will be reviewed as part of the initial desk audit. Subsequently, this element will be audited as part of each facility audit through observation, review of records and interviews with operating (sampling preparation) personnel. Evidence may include:

- Methods used to prepare products are documented:
- Methods used for demonstrating products or processes for products are documented;
- The documented methods adequately protect the product;

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- The documented methods are effectively implemented and recorded

15.4.3 Allergen Management

What the SQF Code says

15.4.3.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include:

- i. A risk analysis of those raw materials, ingredients and processing aids, including food grade lubricants, that contain allergens;
- ii. A register of allergens which is applicable in the country of processing and the country (ies) of known destination;
- iii. A list of allergens which is accessible by relevant staff;
- iv. The hazards associated with allergens and their control incorporated into the food safety plan
- v. A system to verify accurate information is provided to the consumer via the product labels;
- vi. Training for management and retail food employees on the essentials of allergy awareness;
- vii. Where allergenic material may be intentionally or unintentionally present, cleaning and sanitation of product contact surfaces between product changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces to prevent cross contact;
- viii. Based on risk assessment, the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be effectively implemented.

15.4.3.2 The product identification system shall make provision for clear identification and labeling in accordance with regulatory requirements of those products produced on equipment on which foods containing allergens were processed.

15.4.3. Implementation Guidance

What does it mean?

Food allergies affect a small but growing proportion of the population. They are most common in children, although some can be life-long, and can cause mild to severe, and sometimes life-threatening, reactions. Most food allergens are proteins and are not denatured in the food manufacturing process. Their recognition, management and communication to the consumer are therefore extremely important and often required by legislation.

Allergens in food can be intentional (i.e. nuts in nut-based products, milk in milk-based products), or as a result of cross-contact, which is the term used when a residue or trace amount of an allergenic ingredient is unintentionally added to a food product. This can happen due to ingredient mixing, line change-overs or insufficient cleaning and sanitation procedures.

Some retailers have high exposure to allergens that are an integral part of the product (e.g. peanuts in bakery products), but other areas may have exposure to cross-contact (meat department), or unintentional allergens, i.e. allergens that are not part of the ingredients. Other areas may have little or no allergen exposure (produce departments).

Retailers must have procedures in place to identify and manage the risk of intentional or cross-contact allergens.

What do I have to do?

This element is not labelled as mandatory, as some SQF retailers may not have any allergen exposure (e.g., closed packages only and no open exposed food). However, it is essential that retailers that may be exposed to intentional or cross-contact allergens have a management program in place to preserve the integrity of allergen containing and non-allergen containing materials and products. Ignorance is not an excuse. Retailers must establish the allergen status of incoming materials and ingredients and have procedures in place to isolate and control materials and products containing allergens.

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15.4.3 Auditing Guidance

The allergen management program shall be reviewed initially at the desk audit and compliance will be assessed by observation, interviews with senior management and operational staff, and review of storage and production records at each facility audit.

Retailers that are exposed to allergenic materials and do not have an adequate allergen management program in place may be subject to a critical non-conformity and a failure of their audit due to regulatory non-compliance and the public health risk.

Evidence may include:

- Regulated allergens are known;
- Allergens that could impact the supplier’s materials, equipment, processes and products are known, including potential cross-contact allergens;
- An allergen management plan is documented and in place;
- Methods included in the allergen management plan are sufficient to prevent unintentional allergen contamination;
- Risk assessments for raw materials containing allergens have been conducted;
- A register of materials and ingredients containing allergens has been developed and is accurate;
- Allergen management is included in the food safety plan(s) (refer 2.4.1.);
- Cleaning, sanitation and inspection of equipment is completed prior to changeover of allergen products;
- Verification of sanitation effectiveness is carried out. Cleaning of equipment containing allergens is verified prior to product changeover;
- Specific procedures have been developed for the storage of allergen containing ingredients;
- Equipment segregation for allergen control is conducted and effectively manages the risk of cross-contact allergens;
- The product identification system addresses materials, ingredients and products containing allergens;
- The product trace system addresses materials, ingredients and products containing allergens;
- Products containing allergens are properly labeled (when retailer performs the labeling) to identify them as allergens, and meet regulatory requirements for allergen labeling;
- Staff is aware of the risk of allergens and the allergen management procedures.

15.4.4 Stock Management

What the SQF Code says

15.4.4.1 The responsibility and methods for ensuring effective stock rotation principles (using first in first out (FIFO)) are applied shall be documented and implemented.

15.4.4.2 Procedures are in place to ensure that all ingredients, materials, work-in-progress, rework and finished product are utilized within their designated shelf-life.

15.4.4 Implementation Guidance

What does it mean?

This element is about how stock is controlled to ensure materials, ingredients, and finished product does not get lost in the process and exceed its shelf life. It is dependent on an effective product identification system.

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What do I have to do?

The retailer must implement a stock rotation program and document that program in a written procedure. The position responsible for implementing and maintaining the program must be clearly defined and the procedure effectively implemented.

The program must meet the retailer’s needs and consumer expectations (products not expired).

The control of stock is not necessarily as simple as “first in, first out” (FIFO). The program must be designed to manage product shelf life and codes based on consumer expectations, product specifications, conditions of the product, storage locations/conditions and inventory management. The criteria that determine when products are not to follow the FIFO process should be defined so that proper stock rotation can be achieved by the facility.

15.4.3 Auditing Guidance

The stock rotation procedures shall be reviewed initially at the desk audit and compliance to this requirement by observation, interview and review of records at each facility audit. Evidence may include:

- Review of stock rotation procedure;
- Review of stock records;
- Understanding of personnel responsible for inventory management;
- Visual confirmation of raw material, ingredient, packaging, work in progress, and finished product stock in storage

15.5 Water & Ice

15.5.1 Water Quality and Utility Management (Including Ice)

15.5.1.1 Water Supply

What the SQF Code says

15.5.1.1.1 Adequate supplies of potable water drawn from a known clean source shall be provided for use during processing operations, as an ingredient and for cleaning the premises, equipment and handwashing.

15.5.1.1.2 Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises, equipment and hand washing.

11.5.1 Implementation Guidance

What does it mean?

Potable water supply at the correct temperature and pressure prescribed by applicable legislation must be of sufficient capacity for all scheduled production needs and meet cleaning and sanitation requirements (refer 15.2.5.1).

What do I have to do?

Potable water, or drinking water, is water that is safe enough to be consumed by humans or used with low risk of harm. In most developed countries, sufficient quantities of potable water are delivered to food retailing facilities for operational purposes. In some countries however, and some regions in developed countries, the potability of municipal water cannot be relied on. The retailer must ensure the availability of sufficient supplies of water both as a handling or processing foods and for cleaning purposes.

11.5.1 Auditing Guidance

This element will be audited as part of each facility audit through observation, review of records and interviews with operational staff. Evidence may include:

- Water used in processing is from a potable source;
- Potable water availability is adequate for processing needs;
- Potable water availability is adequate to meet cleaning requirements;
- Hot water is available for cleaning purposes.

15.5.1.2 Monitoring Water Microbiology and Quality

What the SQF Code says

15.5.1.2.1 Water used for

- i. washing, thawing and treating food;
- ii. an ingredient or food processing aid;
- iii. cleaning food contact surfaces;
- iv. the manufacture of ice;
- v. the manufacture of mist;
- vi. the manufacture of steam that will come in contact with food or used to heat water that will come in contact with food;
- vii. consumer bulk water filling stations.

Shall comply with local, national or internationally recognized potable water microbiological and quality standards as required.

11.5.1.2 Implementation Guidance

What does it mean?

Any water that is used in the process that could come in contact with the product must be verified to be in compliance with local and national standards. In the US and Australia for example, the potability standard for drinking water is <1 coliform / 100 mL water and membrane filtration is the preferred method. However, standards also apply for *Salmonella* spp, *Shigella* spp, enterovirulent *E.coli*, *Vibrio cholera*, *Yersinia enterocolitica*, *Campylobacter jejuni*, and protozoa.

What do I have to do?

This element elaborates on 15.5.1.1. and identifies the areas where potable water must be used, e.g. washing of food product, as an ingredient, cleaning and the manufacture of ice or steam that comes into contact with food product or food contact surfaces.

Where grey water is available (i.e. non-potable, recycled water), it must not be used in any of these areas and must be kept separate from potable water supply. The only exception here may be where potable water used for blanching, fluming or washing may be recycled and used in an earlier stage of the same process. Any re-use of water must be monitored to ensure there is no increased risk for food safety contamination to the products.

The retailer must be aware of the national and/or international potable water standards and any microbiological or chemical water standards imposed by regulators. Analysis must be conducted to ensure water continues to meet the required standard.

11.5.1.2 Auditing Guidance

This element will be audited as part of each facility audit through observation, review of records and interviews with operational staff. Evidence may include:

- The retailer is aware of the relevant water potability standards;
- Only potable water is used to treat, wash or rinse product;
- Water used as an ingredient meets quality requirements;
- Only potable water is used to clean food contact surfaces;
- Only potable water is used to make ice (where applicable);
- Only potable water used to make steam that will come in contact with food.

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15.5.1.3 Water Delivery

What the SQF Code says

15.5.1.3.1 The delivery of water within the premises shall ensure potable water is not contaminated.

15.5.1.3.2 The use of non-potable water shall be controlled such that:

- i. There is no cross contamination between potable and non-potable water lines;
- ii. Non-potable water piping and outlets are clearly identified.

11.5.1.3 Implementation Guidance

What does it mean?

Even though potable water may be available to the site, the retailer must ensure that the delivery systems for water within the premises are safe with no risk of cross-contamination.

What do I have to do?

The retailer must ensure that water reticulation lines within the site are constructed of suitable material and in good condition, with no rust or corrosion.

All water systems must be protected against backflow. Backflow prevention devices shall be installed on all water and steam lines in the processing facility. Except where justified, "grey" or non-potable water is not to be used in any food processing or handling area. At no time can non-potable water be substituted for potable water where potable water is required to be used by applicable legislation.

If non-potable water is used on the premises, a map indicating potable and non-potable water lines shall be maintained and updated as needed. Descriptions of the mechanisms used to prevent cross-contamination shall be fully described.

11.5.1.3 Auditing Guidance

This element will be audited as part of each facility audit through observation, review of records and interviews with operational staff. Evidence may include:

- Water delivery lines within the premises are in good condition;
- The supply of potable water is adequately protected;
- Potable and non-potable water lines and outlets are clearly labeled;
- Where grey water or non-potable water is used, there is no opportunity for cross-contamination between potable and non-potable water lines;
- There is no opportunity for non-potable water to be used in lieu of potable water.

11.5.1.4 Water Treatment

What the SQF Code says

15.5.1.4.1 Water treatment methods, equipment and materials (including consumer bulk water filling stations) shall be designed, installed and operated to ensure water receives an effective treatment.

15.5.1.4.2 Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

15.5.1.4.3 Treated water shall be regularly monitored to ensure it meets the indicators specified.

11.5.1.4 Implementation Guidance

What does it mean?

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In many facilities, chemical treatment of water is required to maintain the correct pH or chemical balance for use in boilers, heaters or as an ingredient. Treatment must be controlled and carefully monitored where the above are required.

What do I have to do?

Water and boiler (water heater) treatment chemicals must be approved for such use and properly stored (refer 15.4.1.4).

Procedures must be written and implemented for all water treatment methods used within the premises.

Where in-facility chlorination of water is required for washing, rinsing or cleaning purposes, a free residual chlorine level of 0.25 ppm after 20 minutes of contact time (or equivalent at the point of use) is recommended. In-line chlorination that provides higher levels of free residual chlorine at specific points is also acceptable. Regular sampling and testing of residual chlorine is implemented to ensure a safe water supply. Other methods of bactericidal treatment such as UV lighting may be used. In all cases, a program of regular microbiological testing of water is required to verify in-facility effectiveness of all water treatments (refer 15.5.1.6.).

11.5.1.4 Auditing Guidance

Water treatment procedures (where applicable) will be reviewed as part of the initial desk audit. Subsequently, this element will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Water treatment is performed as per written instructions;
- Water treatment that is carried out is appropriate;
- Water treatment is carried out using approved chemicals;
- Water treatment equipment is regularly monitored;
- Treated water is regularly monitored.

15.5.1.5 Ice Supply

What the SQF Code says

15.5.1.5.1 Ice provided for use during processing operations or as a processing aid or an ingredient or for customer and consumer purchase for consumption shall comply with 15.5.1.2.

15.5.1.5.2 Ice rooms and receptacles shall be constructed of materials as outlined in elements 15.2.1 and designed to minimize contamination of the ice during storage, distribution, sale and use.

11.5.1.5 Implementation Guidance

What does it mean?

Where ice is required for processing or storage of product, it must be made from potable water and under hygienic conditions. Ice storage rooms and containers must be designed and constructed of suitable materials and be maintained in good condition.

What do I have to do?

Ice used as an ingredient or processing aid or ice that comes into contact with food or food contact surfaces or equipment must meet potable water requirements, microbiological and quality standards as required. Ice storage areas, equipment and dispensing tools shall be easy to clean.

11.5.1.5 Auditing Guidance

This element will be audited as part of each facility audit through observation, review of records and interviews with operational staff. Evidence may include:

- Ice is made from potable water;
- Ice is made under hygienic conditions;
- Ice is properly protected during manufacture, storage and use;
- Ice in contact with food product complies with national or customer standards;
- Ice storage areas are properly designed and constructed;

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- Ice storage areas are maintained in good condition.

15.5.1.6 Analysis

What the SQF Code says

15.5.1.6.1 Microbiological analysis of the water and ice supply shall be conducted, per regulatory requirement, to verify the cleanliness of the supply, the monitoring activities and the effectiveness of the treatment measures implemented.

15.5.1.6.2 Water and ice shall be analyzed using nationally recognized methods standards or alternative methods which are validated as equivalent to the nationally recognized methods. Where external laboratories are utilized to conduct input or product analysis, the laboratories shall be accredited to ISO 17025 or an equivalent national standard.

15.5.1.6.3 Records of all analyses shall be maintained.

11.5.1.6 Implementation Guidance

What does it mean?

Even though the water supply may come from the town or regional water supply in which the water is treated, safety tested and maintained by the local authority, it is required that food retailers with food handling or processing implement their own testing to ensure the safety of the potable water used within the facility.

What do I have to do?

The monitoring may involve one or a number of the following:

- Regular testing of water (e.g., pH, turbidity);
- Checking filtration apparatus and changing it as required;
- Regular cleaning of water holding tanks and reservoirs;
- Regular monitoring of sanitizer levels in water (levels normally tested at various sites in the food handling and processing areas).

Water should be tested at least every 12 months for potability and any additional safety attribute. When utilizing an outside laboratory, seeking a laboratory that is properly accredited to complete the desired analysis is required. The water must be retested any time the water source is changed or when equipment is added to treat the water system.

If ice is supplied by an outside source, the site must have a current analysis of potability on file. Any treatment of water on-site, either prior to usage or as a treatment of waste water, the treatment needs to have applicable analysis verifying the efficiency of the treatment.

11.5.1.6 Auditing Guidance

Water testing procedures will be reviewed as part of the initial desk audit. Subsequently, this element will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- There is a documented water testing procedure in place, including frequency and test method;
- Water (and ice, where applicable) are microbiologically tested to verify cleanliness of the supply;
- Water (and ice, where applicable) are microbiologically tested to verify the effectiveness of treatment methods;
- Appropriate standards are used to analyze water or ice;
- Where external laboratories are used, the laboratories are accredited to offer water testing services. External laboratories shall be accredited to ISO 17025 or an equivalent national standard.

15.6 Waste Disposal

15.6.1 Waste Management

What the SQF Code says

15.6.1.1 The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.

15.6.1.2 Waste shall be removed on a regular basis and not build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until such time as external waste collection is undertaken.

15.6.1.3 Trolleys, vehicles, waste disposal equipment, collection bins and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.

15.6.1.4 Adequate provision shall be made for the disposal of all solid processing waste including trimmings, inedible material and used packaging. Waste held on site prior to disposal shall be stored in a separate storage facility and suitably insect proofed and contained so as not to present a hazard.

15.6.1.5 Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall be either removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal so as not to present a hazard.

15.6.1.6 Waste that is to be used for animal feed shall follow regulatory requirements for proper handling, disposal, transport and pick-up.

15.6.1 Implementation Guidance

What does it mean?

The procedures for storage and disposal of all types of waste – dry and liquid – must be documented and implemented. The procedure will include how waste is contained in appropriate, covered and labeled containers; the frequency of disposal; how it is disposed of; and who is responsible for it. Local regulations and community expectations concerning recycling and waste disposal and transport must also be considered.

What do I have to do?

As with solid waste, the disposal of any liquid waste from a retailer’s food handling or processing operation is essential to the maintenance of a clean and safe working environment. Procedures are to be in place to monitor the effective removal of liquid and solid wastes per written facility procedures. On-site incinerators, compactors or other waste collecting/disposal equipment need to be designed, sited, constructed and operated so as not to create a hazard to product or the surrounding environment. Compactors and other waste storage areas must not be sited adjacent to any area where food product is exposed.

Cafeteria/lunch room/store sample tasting food waste shall be stored separately from other waste in covered pest-proofed containers and emptied on a basis that prevents the attraction of pests.

At the end of each shift or day (depending on the site and operation), all office trash, processing trash, packaging material trash, etc. needs to be removed by designated employees and disposed of in the external trash receptacle. All trash generated in the retailer food handling or processing areas must be separated for recycling where possible.

Empty chemical containers shall be collected and transported to secured storage (refer 15.4.1.4.)

Exterior waste containers need coverage or lids to prevent attracting pests (such as flies, birds or vermin). It is also advisable to secure waste containers in regard to site security requirements

- Review of the waste collection and handling system should be incorporated as part of the internal audit program of the site (refer 2.5.1).

15.6.1 Auditing Guidance

Waste handling, storage and disposal procedures shall be reviewed as part of the initial desk audit. Subsequently, waste storage and removal will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Waste handling, storage and disposal procedures are documented;

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- Waste handling, storage and disposal procedures include how waste is contained in appropriate, covered and labeled containers; frequency of disposal; how it is disposed of; and who is responsible for waste handling and disposal;
- Waste handling, storage and disposal procedures are fully implemented;
- Waste handling, storage and disposal procedures adequately dispose of waste without risk of product contamination;
- Waste is regularly removed from processing and food handling areas;
- Waste collection and storage areas are maintained and cleaned;
- Containers for waste are properly maintained and cleaned;
- Trolleys, vehicles and equipment used for waste are properly cleaned;
- Daily inspections are conducted to monitor handling of waste;
- Records are maintained of waste disposal;
- The waste system is included in the internal audit program.

15.6.2 Salvage Operations/ Reclamation

What the SQF Code says

15.6.2.1 The responsibility and methods outlining how product is disposed, donated, resold, restocked or reused shall be documented and implemented. The methods applied shall ensure:

- i. operations are supervised by qualified personnel;
- ii. product is clearly identified and labeled; and
- iii. processes follow regulatory requirements to ensure safety and integrity of food is maintained.

15.6.2 Implementation Guidance

What does it mean?

Retailers often have products that do not meet the expectations of consumers or the retail brand reputation but are still potentially usable for food banks or other discount stores, etc. Some products must be disposed of while others can be sold for use in animal food. The procedures for assessing the food safety of, handling, storing, reselling, restocking and/or disposal must be documented and implemented. The procedure will include how the product is assessed for food safety, who is responsible for it and the procedures for handling, storing, communicating decisions for disposition of products will be written, implemented, and trained to appropriate relevant personnel. Local regulations and community expectations concerning the resale, restocking, food bank or other food donations, and disposal as well as the transport for these products must also be considered.

What do I have to do?

Retailers must establish written procedures for how they will evaluate foods that will no longer be offered for sale under their normal sale system (products that do not meet specifications, expectations or retailer brand requirements for a multitude of reasons) for food safety to assist with a determination the disposition of those products (such as donation, resale to discount retailer, restocked, or disposed of). Responsible personnel will be trained and deemed competent to perform these procedures and all procedures will be documented with supervisory personnel reviewing these decisions to ensure the appropriate food safety measures are to be undertaken.

11.6.2 Auditing Guidance

Salvage, reclamation and disposal procedures shall be reviewed as part of the initial desk audit. Subsequently, salvage, reclamation and waste disposal will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Salvage, reclamation handling, storage and disposal procedures are documented;
- Procedures adequately prevent risk of product contamination;

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- Salvage and reclamation collection and storage areas are maintained and cleaned;
- Salvage and reclamation containers for waste are properly maintained and cleaned;
- Trolleys, vehicles and equipment used for salvage and reclamation activities are properly cleaned;
- Daily inspections are conducted to monitor handling of salvage and reclamation;
- Records are maintained of salvage and reclamation;
- The salvage and reclamation is included in the internal audit program
- Salvage and reclamation personnel are adequately trained and understand the risks for food safety contamination of other products

15.6.3 Product Damage or Returns

What the SQF Code says

15.6.3.1 System shall be in place to maintain product safety when determining future use or disposal of products that are found to be damaged and/or returned to the store(s) by customer and consumer.

15.6.3 Implementation Guidance

What does it mean?

Retailers often have policies where consumers can return products to the store due to food safety or quality reasons. The retailer must have established written procedures of how they are to evaluate those returned products for food safety and to determine the future use or disposal of these products returned.

What do I have to do?

The retailer must have written procedures for handling, storing, evaluating for food safety, responsibilities for decision making as well as disposition for these returned products (such as return to a supplier, dispose of the products, refunds, etc.). These procedures must be fully implemented and documented and responsible personnel must be adequately trained and competent to perform these functions.

11.6.3 Auditing Guidance

Product return procedures shall be reviewed as part of the initial desk audit. Subsequently, product return operations will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Product return procedures are documented;
- Procedures adequately prevent risk of product contamination;
- Product returns are documented; reviewed and trended to determine food safety practices are appropriate
- Responsible personnel are trained and competent and understand the risks for food safety
- Appropriate dispositions are made for returned products
- Product return program is included in internal audits

15.7 Receiving & Transportation

15.7.1 Transport

15.7.1.1 Loading

What the SQF Code says

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15.7.1.1.1 Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose and free from odors or other conditions that may impact negatively on the product.

15.7.1.1.2 Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity.

15.7.1.1 Implementation Guidance
<p>What does it mean?</p> <p>The duty of assuring food safety of the retailer’s product continues all the way until a product might be loaded and ready for transport to another facility (such as a donation to a food bank etc.). Loading, procedures must be documented and implemented to show the evaluation or inspection of the vehicles being loaded. They shall include conditions and inspections for outbound refrigerated and ambient trucks and trailers.</p> <p>What do I have to do?</p> <p>Prior to loading, vehicles carrying refrigerated product must be pre-chilled. Refrigerated units need to be capable of cooling and maintaining finished product at refrigeration temperature of 5°C (40°F) or below at the point of loading. Inspections must ensure the ability to cool and maintain temperatures (where applicable) on all outbound trucks/trailers. Inspections must verify the setting of the refrigeration unit of the trailer (when applicable).</p> <p>For all outbound trucks and trailers a visual inspection to support the food safety of all products being loaded must be conducted for cleanliness, pest infestation and structural conditions and to verify that all trucks/trailers are free of offensive odors. All inspection findings are to be maintained in records.</p>
15.7.1.1 Auditing Guidance
<p>This element will be audited as part of each facility audit by observations, review of records and interview with warehouse operators and drivers Evidence may include:</p> <ul style="list-style-type: none"> • Pre-shipment reviews are conducted on transportation vehicles for cleanliness, maintenance, and suitability; • The requirement for pre-shipment inspection is included in the transport protocol and the transport contract • Loading and staging of product does not expose product to potential abuse or contamination.

15.7.1.2 Transport

What the SQF Code says

15.7.1.2.1 Refrigerated and hot holding units shall maintain the food at required temperatures and the unit’s temperature settings shall be set, checked and recorded before loading and core product temperatures recorded at regular intervals during loading as appropriate.

15.7.1.2.2 The refrigeration and hot holding units shall be operational at all times and checks completed of the unit’s operation, the door seals and the storage temperature checked at regular intervals during transit.

15.7.1.2 Implementation Guidance
<p>What does it mean?</p> <p>Many retailers are transporting products to other locations either through donation or delivery to homes, etc. This element relates to transportation from cold storage (refrigerated or frozen 15.4.1.1.) and dry products (15.4.1.2.dry storage). The loading of cold and frozen must be done in a way to minimize the food safety risks to the receiving location.</p> <p>What do I have to do?</p> <p>All products shall be kept in appropriate conditions as to the type of product and shall be kept dry and free from contamination which may lead to waste of materials and potential hazards in the final product.</p>

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15.7.1.2 Auditing Guidance

This element will be audited as part of each facility audit through observation. Evidence may include:

- Dry products are loaded separately from chilled/frozen products;
- Hot holding units are capable of achieving and maintaining appropriate and required hot temperatures
- Cold holding units are capable of achieving and maintaining appropriate and required Cold temperatures (refrigerated or frozen)
- Temperatures are taken on products just prior to and during the loading process to ensure proper temperatures are maintained.
- Units seals are intact and are not posing a risk to food safety of products being transported.

15.7.1.3 Delivery

What the SQF Code says

15.7.1.3.1 Delivery of food off site to customer or consumer should not present a risk to food safety or security.

15.7.1.3 Implementation Guidance

What does it mean?

Retailers may establish a delivery program to deliver products to homes and other specific locations (such as assisted living facilities or even businesses). It is essential that the retailer develop and implement protocols and procedures for ensuring the delivery service is performed in a manner that does not pose a risk to the food safety of the products being delivered (frozen, fresh chilled, refrigerated, or ambient).

What do I have to do?

The retailer must establish written procedures for collecting products, loading products and delivering products to outside locations (such as homes, day care centers, assisted living facilities, etc.) in a manner that protects the food safety of each product (temperature, pathogen contamination and allergen cross contact between delivery orders).

15.7.1.3 Auditing Guidance

Delivery procedures shall be reviewed as part of the initial desk audit. Subsequently, delivery operations will be audited as part of each facility audit through observation, review of records and interviews with operating personnel. Evidence may include:

- Delivery procedures are documented;
- Procedures adequately prevent risk of product contamination;
- Delivery temperature checks are made and recorded at appropriate intervals or frequencies;
- Delivery personnel are adequately trained and understand the risks for food safety of products being delivered;
- Delivery records are maintained

15.7.2 Receiving Products

What the SQF Code says

15.7.2.1 Prior to opening the doors, the refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.

15.7.2.2 Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity.

15.7.2 Implementation Guidance

What does it mean?

This element refers to unloading practices for refrigerated (i.e. chilled or frozen) goods, and specifies practices that shall be included in the transport protocol (refer 15.4.2.9.) if applicable. It will generally apply to incoming finished products, but may also apply to the delivery of ingredients and raw materials for retail food handling and processing operations.

What do I have to do?

The retailer must verify all incoming shipments are from approved suppliers, or are being shipped under prior arrangements made by site management.

Visual inspection and documentation of all incoming shipments of finished products or raw materials is required. The retailer must verify that all incoming carriers are in good repair, clean and free of offensive odors. Proper securing of all shipments shall be checked when delivered.

All seal numbers shall be recorded on receiving/shipping documents before the seal is broken. The retailer must record receiving temperatures and supplier codes for traceability purposes and inspect all incoming materials.

15.7.2 Auditing Guidance

This element will be audited as part of each facility audit through observation, review of records and interviews with warehouse operators. Evidence may include:

- Unloading protocols for refrigerated vehicles are documented;
- Unloading protocols for refrigerated vehicles are implemented;
- Prior to opening the doors, the refrigeration units on incoming refrigerated vehicles are checked;
- Unloading and receiving of refrigerated product include monitoring product temperatures;
- All incoming materials are inspected prior to receiving;
- All incoming materials are transferred to appropriate storage as required to maintain the temperature and integrity of the product;
- Product temperatures indicate that product remains within the required range;
- Corrective action is taken if core product temperatures are outside the required range;
- Corrective action is taken if inspection of incoming materials finds damage, infestation or product contamination.