

SQF Food Safety and Quality Codes

Key Changes for the Technical Requirements



Public comment period July 1st – 31st

<https://www.sqfi.com/resource-center/edition-9-public-comment/>

Edition 9.0 Update

Agenda

Edition 9 Update

1. Initial Objectives and Timeline
2. Part B: The Food Safety Codes (the auditable standard)
 - 2.1 Architecture of the Food Safety Codes
 - 2.2 Initial consolidation
 - 2.3 Technical Working Groups
 - 2.4 Edition 9 Draft Changes
 - 2.5 Changes to meet GFSI 2020
3. Part A: Implementing and Maintaining the Codes
 - 3.1 Audit duration, audit scoring, remote audits, unannounced audits, suspension/withdrawal
4. The Quality Code
5. Appendices
7. Next steps

1. Initial Objectives and Timeline

OBJECTIVES

Improve the architecture and structure of the Codes

- Re-evaluate the FSCs
- Reduce number of elements in all Codes

Meet GFSI requirements (BR8)

Stakeholder input

- Stakeholder survey
- Retailer input

Review auditor, consultants, trainer, technical reviewer and witness auditor assessor and witness audits criteria

Review audit protocol. Focused audit

TIMELINE

Technical review has started

Q3, Q4 2019: Stakeholder survey; retailer input

(GFSI BR 8.0 available March 2020)

Draft Codes completed: May 2020

Public comment: July – August 2020

Revise audit tools, training materials, etc.: Q3, Q4 2020

Publish Codes: October 2020

Implementation: May 2021

Divide the SQF Food Safety Code for Primary Production into three independent commodity codes

Indicates proposed new module

Code	Animal Production	Plant Production	Seafood Production				
FSCs	FSC 1: Production, Capture and Harvesting of Livestock and Game Animals	FSC 2: Growing and Harvesting of Sprouted Seed Crops (NEW!) FSC 3: Growing and Production of Fresh Produce and Nuts FSC 5: Extensive Broad Acre Agricultural Operations	FSC 6: Harvest and Intensive farming of fish				
Products	Free Range Animal Production Intensive Animal Production Dairy farming Game Animals Egg Production Apiculture	Growing of fruit, vegetables and nuts Indoor cultivation including microgreens and seeded sprouted seeds (NEW!) Hydroculture (NEW!) Broad acre crops	Wild catch fish Aquaculture Crustaceans				
GFSI scope (BR 8.0)	AI: Farming of animals for meat, milk, eggs and honey	BI: Farming of Plants (other than grains and pulses) (FSC 2, 3) BII: Farming of Grains and Pulses (FSC 5) BIII: Primary conversion of plant products (FSC 4)	AI – Farming of Fish and Seafood				
Modules	System Elements (Mod 2) (System elements customised to animal production)	System Elements (Mod 2) (System elements customised to plant production)	System Elements (Mod 2) (System elements customised to seafood production)				
	<div style="border: 1px solid black; background-color: #92d050; padding: 5px; margin-bottom: 5px;"> Module 5 GAP for Farming of animals </div> <div style="border: 1px solid black; background-color: #f4a460; padding: 5px; margin-bottom: 5px;"> Module GAP for Apiculture </div>	<div style="border: 1px solid black; background-color: #92d050; padding: 5px; margin-bottom: 5px;"> Module 7 GAP for growing of fruit, vegetables, and nuts (outdoors) </div> <div style="border: 1px solid black; background-color: #f4a460; padding: 5px; margin-bottom: 5px;"> Module GAP for Indoor cultivation, hydroculture </div> <div style="border: 1px solid black; background-color: #92d050; padding: 5px; margin-bottom: 5px;"> Module 10 GMP for Indoor packing of fruit, vegetables and nuts </div> <div style="border: 1px solid black; background-color: #92d050; padding: 5px; margin-bottom: 5px;"> Module 8 GAP for broad acre crops </div>	<div style="border: 1px solid black; background-color: #92d050; padding: 5px; margin-bottom: 5px;"> Module 6 GAP for aquaculture </div>				
Notes	<ul style="list-style-type: none"> Remove egg production from this module Sub-section on feedlots? 	<ul style="list-style-type: none"> Apiculture moved from Manufacturing Code 	<ul style="list-style-type: none"> Remove 7H, but consider any items in 7H that could benefit mod 7 	<ul style="list-style-type: none"> Include microgreens, seeded sprouts as FSC 2 Include mushrooms, cannabis? 	<ul style="list-style-type: none"> Move from Manufacturing Code to Primary Code 	<ul style="list-style-type: none"> Focus on rice production in particular for Asian market? 	<ul style="list-style-type: none"> Emphasis on farming of fish

2.1 Architecture of the Food Safety Codes

Divide the SQF Food Safety Code for Manufacturing into four independent commodity codes

 Indicates proposed new module

Code	Food Manufacturing	Manufacture of Animal Products	Manufacture of Dietary Supplements	Manufacture of Pet Food	Manufacture of Animal Feed
FSCs	<ul style="list-style-type: none"> FSC 9 Seafood Processing FSC 10 Dairy Food Processing FSC 11 Honey Processing FSC 12 Egg Processing FSC 13 Bakery and Snack Food Processing FSC 14 Fruit, Vegetable and Nut Processing, and Fruit Juices FSC 15 Canning, UHT and Aseptic Operations FSC 16 Tea, Drink and Beverage Processing FSC 17 Confectionery Manufacturing FSC 18 Preserved Foods Manufacture FSC 19 Food Ingredient Manufacture FSC 20 Recipe Meals Manufacture FSC 21 Oils, Fats, and the Manufacture of oil or fat-based spreads FSC 22 Processing of Cereal Grains 	<ul style="list-style-type: none"> FSC 7 Slaughterhouse, Boning and Butchery Operations FSC 8 Processing of Manufactured Meats and Poultry 	<ul style="list-style-type: none"> FSC 31 Manufacture of Dietary Supplements 	<ul style="list-style-type: none"> FSC 32 Manufacture of pet food 	<ul style="list-style-type: none"> FSC 34 Manufacture of animal feed
Products	All processed foods products except for manufactured meat products	<ul style="list-style-type: none"> Uncooked poultry, red meat, pig meat, game animals Whole carcasses Butchered meat Heat treated and fermented meat products Value-added products where meat is the major ingredient 	Dietary supplements including vitamins, probiotics, and label supplements	<ul style="list-style-type: none"> Dry pet food Moist pet food Semi-raw, chilled or frozen pet foods Pet treats 	<ul style="list-style-type: none"> Single or compound feed intended for consumption by food-chain animals Medicated feeds stable
GFSI scope (BR 8.0)	<ul style="list-style-type: none"> C1—Processing of perishable animal products (dairy, seafood) C11—Processing of perishable plant products C111—processing of perishable animal and plant products CIV—processing of ambient stable animal and plant products 	<ul style="list-style-type: none"> CO—Animal primary conversion C1—Processing of perishable animal products (red meat, pork, poultry) 	<ul style="list-style-type: none"> K—Production of (Bio) chemicals and bio-cultures 	<ul style="list-style-type: none"> D1 - Production of feed 	<ul style="list-style-type: none"> D1 - Production of feed
Modules	<ul style="list-style-type: none"> System Elements (Mod 2) (System elements for food manufacturing) Module 11 GMP for process of food products 	<ul style="list-style-type: none"> System Elements (Mod 2) (System elements customised to manufacture of meat products) Module 9 GMP for Pre-processing of animal products 	<ul style="list-style-type: none"> System Elements (Mod 2) (System elements customised to manufacture of dietary supplements) Module DS GMP for process of dietary supplements* 	<ul style="list-style-type: none"> System Elements (Mod 2) (System elements customised to plant production) Module 4 GMP for processing of pet food 	<ul style="list-style-type: none"> System Elements (Mod 2) (System elements customised to seafood production) Module 3 GMP for processing of animal feed
Notes	<ul style="list-style-type: none"> Manufacture of processed meats removed from module 11 FSC 25 Repackaging moved to Storage and Distribution 	<ul style="list-style-type: none"> Module 9 modified to include manufacture of processed meat 	<ul style="list-style-type: none"> *Guidance already drafted, to be incorporated into GMP module once Food Manufacturing finalised 	<ul style="list-style-type: none"> Review and update 	<ul style="list-style-type: none"> Review and update

No significant changes in Code structure or modules

Code	Storage & Distribution	Manufacturing of Food Packaging	Food Retail	Food Service
FSCs	FSC 26: Food Storage and Distribution	FSC 27: Manufacture of Food Packaging	FSC 24: Food Retailing	FSC 23: Food Catering and Food Service Operations
Products	Receipt, storage, display, consolidation and distribution of perishable fresh produce and general food lines including chilled, frozen, dry goods, stable or pre-processed and packaged foods and/or food intended for further preparation by the consumer at wholesale level.	<ul style="list-style-type: none"> Manufacture, storage and transport of food sector packaging materials. Includes items that may be used in food manufacturing or food service facilities, including paper towel, napkins, disposable food containers, straws, stirrers. 	All foods distributed and sold through retail outlets	<ul style="list-style-type: none"> Food service caterers, retail delicatessen/self-serve facilities, restaurants, fast food outlets, delicatessens, school cafeterias (canteens), hospital/institution meal services, childcare centers, and mobile and home delivery food services. Includes sandwiches, wraps, and high-risk desserts that are prepared on site and are RTE.
GFSI scope (BR 8.0)	G- Provision of Storage and Distribution	I -- Production of Food Packaging	F1- Retail/Wholesale	E - Catering
Modules	System Elements (Mod 2) (System elements for storage and distribution)	System Elements (Mod 2) (System elements customised to manufacture of food packaging)	SQF System Elements for Retail	SQF System Elements for Foodservice
	Module 12 GDP for storage & distribution	Module 13 GMP for manufacture of food packaging	Module 15 Good retail practices	Module 16 Good Operating Practices for foodservice
Notes	<ul style="list-style-type: none"> Review and Update 	<ul style="list-style-type: none"> Review and update 	<ul style="list-style-type: none"> Review and update 	<ul style="list-style-type: none"> Review and update

2.2 Initial Consolidation (January 2020)

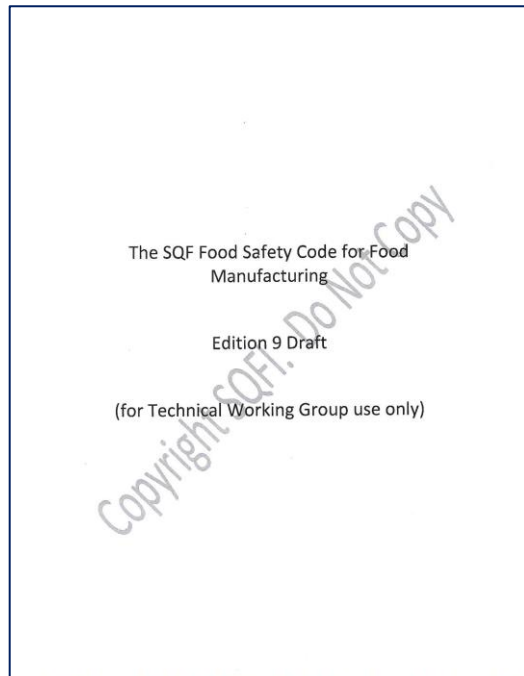
The SQF Technical Team worked on the **SQF Food Safety Code for Manufacturing, Edition 8.1** to consolidate some of the requirements and reduce the number of elements to reduce duplication.

As a result, the number of sections in Part B were reduced by **25%**, and the number of elements across modules 2 and 11 reduced by **10%** without impacting the content or integrity of the standard.

The same revised format was applied to the other SQF Food Safety Codes.



2.3 Technical Working Groups



The TWG process:

1. Send out and received a signed confidentiality agreement
2. SQF Lead sends out a working draft (Word, and Excel)
3. Conference call to review working draft
4. TWG members send in their comments to SQF Lead
5. SQF Lead consolidates comments and sends back out to TWG
6. Follow up call(s) to change or review findings
7. TWGs complete by mid-April

Many thanks to all that volunteered to participate in our technical working groups to update and develop our Codes. The input and feedback was invaluable in how we develop our programs.

Ed 8.1 v Ed 9 System Elements

Edition 8.1		Edition 9 Draft			
System Elements	Sections	Clauses	System Elements	Sections	Clauses
2.1 Management Commitment	5		2.1 Management Commitment	3	
2.1.1 Food Safety Policy (Mandatory)		2	2.1.1 Management Responsibility (Mandatory)		8
2.1.2 Management Responsibility (Mandatory)		11	2.1.2 Management Review (Mandatory)		3
2.1.3 Management Review (Mandatory)		4	2.1.3 Complaint Management (Mandatory)		3
2.1.4 Complaint Management (Mandatory)		4			
2.1.5 Crisis Management		4			
2.2 Document Control and Records	3		2.2 Document Control and Records	3	
2.2.1 Food Safety Management System (Mandatory)		2	2.2.1 Food Safety Management System (Mandatory)		2
2.2.2 Document Control (Mandatory)		3	2.2.2 Document Control (Mandatory)		2
2.2.3 Records (Mandatory)		3	2.2.3 Records (Mandatory)		3
2.3 Specification and Product Development	5		2.3 Specifications, Formulations, Realisation and Supplier Approval	4	
2.3.1 Product Development and Realisation		5	2.3.1 Product Formulation and Realisation		6
2.3.2 Raw and Packaging Materials		7	2.3.2 Specifications (Raw Material, Packaging, Finished Product and Services)		11
2.3.3 Contract Service Providers		2	2.3.3 Contract Manufacturers		4
2.3.4 Contract Manufacturers		3	2.3.4 Approved Supplier Program (Mandatory)		5
2.3.5 Finished Product Specifications		2			
2.4 Food Safety System	8		2.4 Food Safety System	8	
2.4.1 Food Legislation (Mandatory)		3	2.4.1 Food Legislation (Mandatory)		3
2.4.2 Good Manufacturing Practices (Mandatory)		2	2.4.2 Good Manufacturing Practices (Mandatory)		2
2.4.3 Food Safety Plan (Mandatory)		17	2.4.3 Food Safety Plan (Mandatory)		16
2.4.4 Approved Supplier Program (Mandatory)		10	2.4.4 Product Sampling, Inspection and Analysis		6
2.4.5 Non-conforming Product or Equipment		2	2.4.5 Non-conforming Materials and Product		2
2.4.6 Product Rework		2	2.4.6 Product Rework		1
2.4.7 Product Release (Mandatory)		2	2.4.7 Product Release (Mandatory)		2
2.4.8 Environmental Monitoring		4	2.4.8 Environmental Monitoring		3
2.5 SQF System Verification	5		2.5 SQF System Verification	4	
2.5.1 Validation and Effectiveness (Mandatory)		2	2.5.1 Validation and Effectiveness (Mandatory)		1
2.5.2 Verification Activities (Mandatory)		3	2.5.2 Verification Activities (Mandatory)		2
2.5.3 Corrective and Preventative Action (Mandatory)		2	2.5.3 Corrective and Preventative Action (Mandatory)		2
2.5.4 Product Sampling, Inspection and Analysis		4	2.5.4 Internal Audits and Inspections (Mandatory)		4

Ed 8.1 v Ed 9 System Elements

2.5.3 Corrective and Preventative Action (Mandatory)		2	2.5.3 Corrective and Preventative Action (Mandatory)		2
2.5.4 Product Sampling, Inspection and Analysis		4	2.5.4 Internal Audits and Inspections (Mandatory)		4
2.5.5 Internal Audits and Inspections (Mandatory)		5			
2.6 Product Identification, Trace, Withdrawal and Recall	3		2.6 Product Traceability and Crisis Management	4	
2.6.1 Product Identification (Mandatory)		3	2.6.1 Product Identification (Mandatory)		2
2.6.2 Product Trace (Mandatory)		2	2.6.2 Product Trace (Mandatory)		1
2.6.3 Product Withdrawal and Recall (Mandatory)		5	2.6.3 Product Withdrawal and Recall (Mandatory)		4
			2.6.4 Crisis Management Planning		2
2.7 Food Defense and Food Fraud	2		2.7 Food Defense and Food Fraud	2	
2.7.1 Food Defense Plan (Mandatory)		4	2.7.1 Food Defense Plan (Mandatory)		4
2.7.2 Food Fraud		4	2.7.2 Food Fraud (Mandatory)		4
2.8 Allergen Management	1		2.8 Allergen Management	1	
2.8.1 Allergen Management (Mandatory)		11	2.8.1 Allergen Management (Mandatory)		11
2.9 Training	7		2.9 Training	2	
2.9.1 Training Requirements		2	2.9.1 Training Requirements		2
2.9.2 Training Program (Mandatory)		1	2.9.2 Training Program (Mandatory)		3
2.9.3 Instructions		1			
2.9.4 HACCP Training Requirements		1			
2.9.5 Language		1			
2.9.6 Refresher Training		1			
2.9.7 Training Skills Register		1			
Sub-total System Elements (module 2)	39	147		31	124
				21%	16%

Ed 8.1 v Ed 9 Module 11

Module 11	Sections	Clauses	Module 11	Sections	Clauses
11.1 Site Location and Premises	1		11.1 Site Location and Premises	8	
11.1.1 Premises Location and Approval		2	11.1.1 Premises Location and Approval		1
11.2 Construction of Premises and Equipment	13		11.1.2 Building Materials		9
11.2.1 Materials and Surfaces		1	11.1.3 Lighting and Light Fittings		3
11.2.2 Floors, Drains and Waste Traps		4	11.1.4 Inspection/Quality Control Area		1
11.2.3 Walls, Partitions, Doors and Ceilings		7	11.1.5 Dust, Insect, and Pest Proofing		3
11.2.4 Stairs, Catwalks and Platforms		4	11.1.6 Ventilation		4
11.2.5 Lighting and Light Fittings		3	11.1.7 Equipment and Utensils		9
11.2.6 Inspection/Quality Control Area		2	11.1.8 Grounds and Roadways		3
11.2.7 Dust, Insect and Pest Proofing		4			
11.2.8 Ventilation		3	11.2 Site Operations	5	
11.2.9 Equipment, Utensils and Protective Clothing		9	11.2.1 Repairs and Maintenance		8
11.2.10 Premises and Equipment Maintenance		11	11.2.2 Maintenance Staff and Contractors		3
11.2.11 Calibration		5	11.2.3 Calibration		6
11.2.12 Pest Prevention		9	11.2.4 Pest Prevention		6
11.2.13 Cleaning and Sanitation		11	11.2.5 Cleaning and Sanitation		9
11.3 Personnel Hygiene and Welfare	10		11.3 Personnel Hygiene and Welfare	5	
11.3.1 Personnel		4	11.3.1 Personnel Welfare		3
11.3.2 Hand Washing		5	11.3.2 Hand Washing		6
11.3.3 Clothing		5	11.3.3 Clothing and Personal Effects		8
11.3.4 Jewelry and Personal Effects		1	11.3.4 Visitors		4
11.3.5 Visitors		5	11.3.5 Staff Amenities (change rooms, toilets, break rooms)		10
11.3.6 Staff Amenities		1			
11.3.7 Change Rooms		4			
11.3.8 Laundry		1			
11.3.9 Sanitary Facilities		3			
11.3.10 Lunch Rooms		4			
11.4 Personnel Processing Practices	1		11.4 Personnel Processing Practices	1	
11.4.1 Staff Engaged in Food Handling and Processing Operations		3	11.4.1 Staff Engaged in Food Handling and Processing Operations		4
11.5 Water, Ice and Air Supply	5		11.5 Water, Ice and Air Supply	5	
11.5.1 Water Supply		5	11.5.1 Water Supply		6
11.5.2 Water Treatment		4	11.5.2 Water Treatment		3
11.5.3 Ice Supply		2	11.5.3 Water Quality		3

Ed 8.1 v Ed 9 Module 11

11.5.1 Water Supply		5	11.5.1 Water Supply		6
11.5.2 Water Treatment		4	11.5.2 Water Treatment		3
11.5.3 Ice Supply		2	11.5.3 Water Quality		3
11.5.4 Water Quality		3	11.5.4 Ice Supply		3
11.5.5 The Quality of Air and Other Gasses		2	11.5.5 Air and Other Gasses		3
11.6 Storage and Transport	8		11.6 Receipt, Storage and Transport	5	
11.6.1 Storage and Handling of Goods		6	11.6.1 Receipt, Storage and Handling of Goods		6
11.6.2 Cold Storage, Freezing and Chilling of Foods		5	11.6.2 Cold Storage, Freezing and Chilling of Foods		4
11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods		3	11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods		2
11.6.4 Storage of Hazardous Chemicals and Toxic Substances		5	11.6.4 Storage of Hazardous Chemicals and Toxic Substances		6
11.6.5 Loading, Transport and Unloading Practices		1	11.6.5 Loading, Transport and Unloading Practices		8
11.6.6 Loading		3			
11.6.7 Transport		2			
11.6.8 Unloading		2			
11.7 Separation of Functions	7		11.7 Separation of Functions	4	
11.7.1 Process Flow		1	11.7.1 High Risk Processes		4
11.7.2 Receipt of Raw and Packaging Materials and Ingredients		1	11.7.2 Thawing of Food		3
11.7.3 Thawing of Food		4	11.7.3 Control of Foreign Matter Contamination		9
11.7.4 High Risk Processes		5	11.7.4 Detection of Foreign Objects		5
11.7.5 Control of Foreign Matter Contamination		9			
11.7.6 Detection of Foreign Objects		3			
11.7.7 Managing Foreign Matter Incidents		2			
11.8 On-site Laboratories	1				
11.8.1 Location		3			
11.9 Waste Disposal	1	9	11.8 Waste Disposal	1	11
11.10 Exterior	1	6			
Sub-total Module 11	48	197		34	176
				41%	12%

TOTAL FOOD MANUFACTURING

87

344

65

300

34%

15%

LITE
Jard.

2.4 Edition 9 Draft Changes Food Manufacturing

Food Manufacturing	Manufacture of Animal Products
<p>ESC 9 Seafood Processing ESC 10 Dairy Food Processing ESC 11 Honey Processing ESC 12 Egg Processing ESC 13 Bakery and Snack Food Processing ESC 14 Fruit, Vegetable and Nut Processing, and Fruit Juices ESC 15 Canning, UHT and Aseptic Operations ESC 16 Tea, Drink and Beverage Processing ESC 17 Confectionery Manufacturing ESC 18 Preserved Foods Manufacture ESC 19 Food Ingredient Manufacture ESC 20 Recipe Meals Manufacture ESC 21 Oils, Fats, and the Manufacture of oil or fat-based spreads ESC 22 Processing of Cereal Grains</p>	<p>ESC 7 Slaughterhouse, Boning and Butchery Operations ESC 8 Processing of Manufactured Meats and Poultry</p>
All processed foods products except for manufactured meat products	<p>Uncooked poultry, red meat, pig meat, game animals Whole carcasses Butchered meat Heat treated and fermented meat products Value-added products where meat is the major ingredient</p>
<p>C1—Processing of perishable animal products (dairy, seafood) C11—Processing of perishable plant products C111—processing of perishable animal and plant products CIV—processing of ambient stable animal and plant products</p>	<p>CO—Animal primary conversion C1—Processing of perishable animal products (red meat, pork, poultry)</p>
System Elements (Mod 2) (System elements for food manufacturing)	System Elements (Mod 2) (System elements customised to manufacture of meat products)
Module 11 GMP for process of food products	Module 9 GMP for Pre-processing of animal products

System Elements (Module 2)

- Scope: Processing of animal products, pet food and animal feed have been removed from this Code into separate Codes. Pre-packing of produce (module 10) has been removed and is now with Primary Plant products;
- Across modules 2, 11 the number of sections has been reduced by 34%, and the number of elements by 15%
- 2.1.1.2 New clause on food safety culture to meet GFSI requirements;
- 2.1.1.4 Added an alternative SQF Practitioner in the absence of the designated SQF Practitioner;
- Black-out period moved from 2.1.2.11;
- “Corrective *and preventative* action” throughout;
- Changed title *2.3 Specifications, Formulations, Realisation and Supplier Approval*;
- 2.3.2.5 New clause - suppliers to notify the site about changes in product composition
- 2.3.2.10 New clause to meet GFSI FSM 10: “*Specifications to be reviewed annually or as changes occur.*”
- 2.3.3.3 New clause on contractual agreements with third party storage and/or distribution businesses;
- 2.4.4.2 Includes reference to internal as well as external laboratories to meet GFSI FSM 19.1 (Testing). External laboratories moved from 11.8.1. Proficiency testing included in 2.4.4.2;

2.4 Edition 9 Draft Changes Food Manufacturing

Food Manufacturing	Manufacture of Animal Products
<p>ESC 9 Seafood Processing ESC 10 Dairy Food Processing ESC 11 Honey Processing ESC 12 Egg Processing ESC 13 Bakery and Snack Food Processing ESC 14 Fruit, Vegetable and Nut Processing, and Fruit Juices ESC 15 Canning, UHT and Aseptic Operations ESC 16 Tea, Drink and Beverage Processing ESC 17 Confectionery Manufacturing ESC 18 Preserved Foods Manufacturing ESC 19 Food Ingredient Manufacture ESC 20 Recipe Meals Manufacture ESC 21 Oils, Fats, and the Manufacture of oil or fat-based spreads ESC 22 Processing of Cereal Grains</p>	<p>ESC 7 Slaughterhouse, Boning and Butchery Operations ESC 8 Processing of Manufactured Meats and Poultry</p>
All processed foods products except for manufactured meat products	<p>Uncooked poultry, red meat, pig meat, game animals Whole carcasses Butchered meat Heat treated and fermented meat products Value-added products where meat is the major ingredient</p>
<p>C1—Processing of perishable animal products (dairy, seafood) C11—Processing of perishable plant products C111—processing of perishable animal and plant products CIV—processing of ambient stable animal and plant products</p>	<p>CO—Animal primary conversion C1—Processing of perishable animal products (red meat, pork, poultry)</p>
System Elements (Mod 2) (System elements for food manufacturing)	System Elements (Mod 2) (System elements customised to manufacture of meat products)
Module 11 GMP for process of food products	Module 9 GMP for Pre-processing of animal products

System Elements (Module 2) - continued

- 2.4.7.2 New clause to meet GFSI FSM 18.2 - product release to confirm that product labels comply with food legislation;
- 2.6.1.2 Added to the clause on product changeovers – *“the correct product is in the correct package and with the correct label”*;
- 2.6.3.2 Added to testing of product recall and withdrawal system - *“testing to be carried out on products from different shifts, and for materials”*;
- 2.6.4 Crisis Management Planning moved from 2.1.5 to 2.6.4 to avoid confusion.
- 2.7.1 Food Defense and 2.7.2 Food Fraud both updated to reflect all food defense and food fraud requirements;
- 2.7.1.1 Food defense threat assessment now included;
- 2.7.2 Food Fraud now mandatory;
- 2.8 Allergen Management. Removed 2.8.2 (pet food) and 2.8.3 (animal feed) as no longer applicable in the Food Manufacturing Code;
- 2.9 Training. Consolidated down to two sections - 2.9.1 Training Requirements and 2.9.2 Training Program;
- 2.9.2.1 Added to the competencies required by relevant staff.



2.5 Changes to meet GFSI 2020 (BR8)

2.1.1.2 Senior site management shall lead and support a **food safety culture** within the site that ensures at a minimum:

- i. The establishment and documentation of clear and concise food safety objectives and performance measures and their communication to all staff;
- ii. Adequate resources are available to meet food safety objectives and performance measures;
- iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained;
- iv. Staff are informed and are aware of their food safety and regulatory responsibilities;
- v. Staff are aware of their role in meeting the requirements of the SQF Food Safety Code for Food Manufacturing and are held accountable for meeting these requirements;
- vi. Staff are positively encouraged and required to notify management of actual or pending food safety issues; and
- vii. Staff are empowered to act to resolve food safety issues within their scope of work.

2.1.1.1 Senior site management shall prepare and implement a policy statement that outlines as a minimum the commitment of all site management to:

- i. Supply safe food;
- ii. Establish and maintain a **food safety culture** within the site;
- iii. Establish and continually improve the site's food safety management system,
- iv. Comply with customer and regulatory requirements to supply safe food.

The policy statement shall be:

- i. Signed by the senior site manager and displayed in prominent positions; and
- ii. Effectively communicated to all staff in language(s) understood by all staff.

2.4 Edition 9 Draft Changes Food Manufacturing

Food Manufacturing	Manufacture of Animal Products
<p>ESC 9 Seafood Processing ESC 10 Dairy Food Processing ESC 11 Honey Processing ESC 12 Egg Processing ESC 13 Bakery and Snack Food Processing ESC 14 Fruit, Vegetable and Nut Processing, and Fruit Juices ESC 15 Canning, UHT and Aseptic Operations ESC 16 Beer, Drink and Beverage Processing ESC 17 Confectionery Manufacturing ESC 18 Preserved Foods Manufacture ESC 19 Food Ingredient Manufacture ESC 20 Recipe Meals Manufacture ESC 21 Oils, Fats, and the Manufacture of oil or fat-based spreads ESC 22 Processing of Cereal Grains</p>	<p>ESC 7 Slaughterhouse, Boning and Butchery Operations ESC 8 Processing of Manufactured Meats and Poultry</p>
All processed foods products except for manufactured meat products	<p>Uncooked poultry, red meat, pig meat, game animals Whole carcasses Butchered meat Heat treated and fermented meat products Value-added products where meat is the major ingredient</p>
<p>C1—Processing of perishable animal products (dairy, seafood) C11—Processing of perishable plant products C111—processing of perishable animal and plant products CIV—processing of ambient stable animal and plant products</p>	<p>CO—Animal primary conversion C1—Processing of perishable animal products (red meat, pork, poultry)</p>
System Elements (Mod 2) (System elements for food manufacturing)	System Elements (Mod 2) (System elements customised to manufacture of meat products)
Module 11 GMP for process of food products	Module 9 GMP for Pre-processing of animal products

Module 11

- 11.1 *Site Location and Premises*. It now covers 11.1.2 *Building Materials*, 11.1.3 *Lighting and Light Fittings*; 11.1.4 *Inspection/QC Area*; 11.1.5 *Dust, Insect, and Vermin Proofing*; 11.1.6 *Ventilation*; 11.1.7 *Equipment and Utensils*; and 11.1.8 *Grounds and Roadways*;
- 11.1.8 *Grounds and Roadways* moved from 11.10 to 11.1.8
- 11.2 *Site Operations*. Includes 11.2.1 *Repairs and Maintenance*; 11.2.2 *Maintenance Staff and Contractors*; 11.2.3 *Calibration*; 11.2.4 *Pest Prevention*; and 11.2.5 *Cleaning and Sanitation*;
- 11.2.2 *Maintenance Staff and Contractors* has been separated out from what was 11.2 *Premises and Equipment Maintenance*;
- 11.3.2.5 Combined references to signage;
- 11.3.3 *Clothing and Personal Effects*. (was “Clothing”) Includes laundering, and protective clothing moved from 11.2.9. Also includes jewelry;
- 11.3.5 *Staff Amenities* includes change rooms, toilets, and break rooms;
- 11.5.1.1 Added to water supply plan “*Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.*”
- 11.5.4.2 New clause in “Ice Supply”: “*Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Is shall be supplied in containers that are appropriate for use, cleanable if reused, and be tested as appropriate.*”

2.5 Edition 9 Draft Changes Food Manufacturing

Food Manufacturing	Manufacture of Animal Products
<p>ESC 9 Seafood Processing ESC 10 Dairy Food Processing ESC 11 Honey Processing ESC 12 Egg Processing ESC 13 Bakery and Snack Food Processing ESC 14 Fruit, Vegetable and Nut Processing, and Fruit Juices ESC 15 Canning, UHT and Aseptic Operations ESC 16 Tea, Drink and Beverage Processing ESC 17 Confectionery Manufacturing ESC 18 Preserved Foods Manufacture ESC 19 Food Ingredient Manufacture ESC 20 Recipe Meals Manufacture ESC 21 Oils, Fats, and the Manufacture of oil or fat-based spreads ESC 22 Processing of Cereal Grains</p>	<p>ESC 7 Slaughterhouse, Boning and Butchery Operations ESC 8 Processing of Manufactured Meats and Poultry</p>
All processed foods products except for manufactured meat products	Uncooked poultry, red meat, pig meat, game animals Whole carcasses Butchered meat Heat treated and fermented meat products Value-added products where meat is the major ingredient
C1—Processing of perishable animal products (dairy, seafood) C11—Processing of perishable plant products C111—processing of perishable animal and plant products CIV—processing of ambient stable animal and plant products	CO—Animal primary conversion C1—Processing of perishable animal products (red meat, pork, poultry)
System Elements (Mod 2) (System elements for food manufacturing)	System Elements (Mod 2) (System elements customised to manufacture of meat products)
Module 11 GMP for process of food products	Module 9 GMP for Pre-processing of animal products

Module 11 (continued)

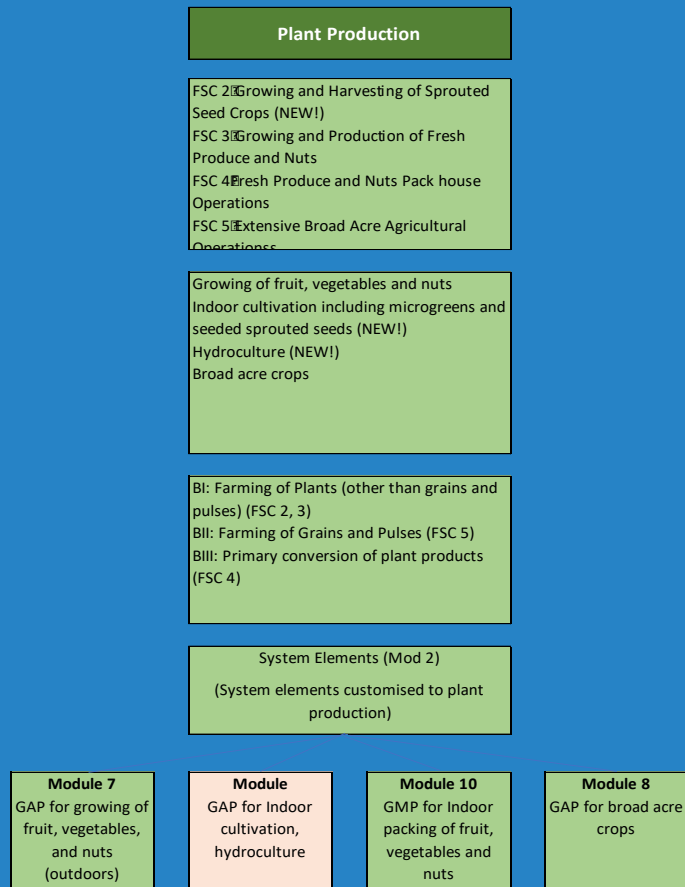
- 11.5.5.3 New clause in “Air and other gasses”: *“Ambient air shall be tested at least annually to confirm that it does not pose a risk to food safety”*;
- 11.6.1.2 New clause to meet GFSI GMP 4.1 to ensure all materials are received and stored properly to prevent cross-contamination risks;
- 11.6.4 Storage of Chemicals. 11.2.13.8 – 11.2.13.10 (detergents and sanitisers) in ed 8 moved to 11.6.4 Storage of Hazardous Chemicals and Toxic Substances. Also applies to chemical storage references in 11.2.4 Pest Prevention;
- 11.7.3.11 New clause: *“Gaskets, Rubber Impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency”*;
- 11.8.1.3 Moved from 11.2.9.5 in ed 8. *“Waste and overflow water from tubs, tanks and other equipment shall be discharged direct to the floor drainage system and meet local regulatory requirements.”*;
- 11.8.1.10 New clause to meet GFSI GMP 12.1 regarding the effective removal and storage (if required) of waste water.

Primary Code Changes

% Reduction of Sections and Clauses

	Outdoor Plant Production	Indoor Plant Production	Packinghouses	
Edition 8.1				
# Sections	72	72	80	
# Clauses	224	224	292	
Edition 9.0				
# Sections	54	55	56	
# Clauses	151	185	191	
% Change				Average
# Sections	-25%	-24%	-30%	-26%
# Clauses	-33%	-17%	-35%	-28%

2.4 Edition 9 Draft Changes Primary Plant Production



- Packinghouse Module 10 move into Primary to align with GFSI and improve competitive offering against other schemes
- Module 2 alignment with Mfg changes **plus**
 - Language update –e.g. “growing areas” for indoor ag
 - GFSI additions – licencing & review process for plant/hybrids, HACCP-based model applied to Packhouses, “significant” incident CAPA
 - Environment monitoring for indoor ag & packhouses
- GAP/GOP’s
 - Language update
 - GFSI – Chemical label compliance, visitor cross-contamination, waste system design
 - Water – CAPA add in for leafy greens
 - Commodity specific SOP’s for harvesting
- # requirements reduced through consolidation and re-design

Code Changes- Pet Food, Storage and Distribution, Food Packaging

% Reduction of Sections and Clauses

	Pet Food	Storage and Distribution	Food Packaging	
Edition 8.1				
# Sections	87	68	74	
# Clauses	224	244	278	
Edition 9.0				
# Sections	65	65	59	
# Clauses	176	214	239	
% Change				Average
# Sections	-25%	-4%	-20%	-16%
# Clauses	-21%	-12%	-14%	-15%

2.4 Tech Team lessons and recommendations

Pet Food, Storage and Distribution, Food Packaging

Pet Food

- 2.3.1.2- Product formulation to include: *Product formulations shall be developed by authorized persons to ensure that they meet the intended use including minimum and maximum nutrient and medicinal values (e.g. vitamin D, thiamine, life stages, species, animal size and or breeds).*
- 2.4.3.5-- *The intended use **and reasonably foreseeable unintended use** of each product shall be determined and documented by the food safety team. This shall include target pet groups, life stage and level of activity. Requirements for further processing if applicable, and potential alternative use of the product.*
- 2.8.1.1 Changed allergens to “Identify Preserved Foods.” This better identifies the hazards to pests (i.e. grain free) and also includes allergen requirements.
- Allergens still required however, removed mandatory requirement for allergens.
- Follow food with a few additional requirements
 - Recommended adding a positive release requirements.
 - Added requirements for labeling bulk requirements.
 - Added requirement for ambient air testing.
 - Added requirements for record keeping in HACCP
 - Added requirement for verification in HACCP

Storage & Distribution

FSC 26: Food Storage and Distribution

Receipt, storage, display, consolidation and distribution of perishable fresh produce and general food lines including chilled, frozen, dry goods, stable or pre-processed and packaged foods and/or food intended for further preparation by the consumer at wholesale level.

G - Provision of Storage and Distribution

System Elements (Mod 2)
(System elements for storage and distribution)

Module 12
GMP for storage & distribution

Manufacturing of Food Packaging

FSC 27: Manufacture of Food Packaging

• Manufacture, storage and transport of food sector packaging materials.
• Includes items that may be used in food manufacturing or food service facilities, including paper towel, napkins, disposable food containers, straws, stirrers.

I -- Production of Food Packaging

System Elements (Mod 2)
(System elements customised to manufacture of food packaging)

Module 13
GMP for manufacture of food packaging

Manufacture of Pet Food

FSC 32 Manufacture of pet food

• Dry pet food
• Moist pet food
• Semi-raw, chilled or frozen pet foods
• Pet treats

D1 - Production of feed

System Elements (Mod 2)
(System elements customised to plant production)

Module 4
GMP for processing of pet food

2.4 Tech Team lessons and recommendations

Pet Food, Storage and Distribution, Food Packaging

Storage and Distribution:

- 2.4.3.1– Removed requirement for HACCP. Food safety plans are HACCP based or based on preventive controls. GFSI allows some flexibility in this requirement and allows for US DCs to follow regulatory requirements without additional food safety requirements.
- Reference PC or CCP in the HACCP section
- Modified 2.4.4.4 Non-conforming product to meet GSI FSM 24.1
 - *The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, packaging or equipment detected during receipt, storage, processing, handling or delivery and include food found to be damaged and/or returned from customers is handled shall be documented and implemented.*
- 2.1.1.5- SQF Practitioner - HACCP training not required
 - Be competent to implement and maintain HACCP based food safety plan and meet applicable regulatory requirements
 - Follow food with customized language to DCs.

Storage & Distribution	Manufacturing of Food Packaging	Manufacture of Pet Food
FSC 26: Food Storage and Distribution	FSC 27: Manufacture of Food Packaging	FSC 32 Manufacture of pet food
Receipt, storage, display, consolidation and distribution of perishable fresh produce and general food lines including chilled, frozen, dry goods, stable or pre-processed and packaged foods and/or food intended for further preparation by the consumer at wholesale level.	<ul style="list-style-type: none"> • Manufacture, storage and transport of food sector packaging materials. • Includes items that may be used in food manufacturing or food service facilities, including paper towel, napkins, disposable food containers, straws, stirrers. 	<ul style="list-style-type: none"> • Dry pet food • Moist pet food • Semi-raw, chilled or frozen pet foods • Pet treats
G - Provision of Storage and Distribution	I -- Production of Food Packaging	D1 - Production of feed
System Elements (Mod 2) (System elements for storage and distribution)	System Elements (Mod 2) (System elements customised to manufacture of food packaging)	System Elements (Mod 2) (System elements customised to plant production)
Module 12 GMP for storage & distribution	Module 13 GMP for manufacture of food packaging	Module 4 GMP for processing of pet food

2.4 Tech Team lessons and recommendations

Pet Food, Storage and Distribution, Food Packaging

Food Packaging

- Follow food with more edits and suggestions specific to the system elements and food packaging.
- 2.1.1.3 – added more language to support organizational alignment
 - *Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.*
- 2.1.1.5- Removed HACCP training for SQF Practitioner to be focused on competency based application
- 2.4.3.4- Added a requirement for training on signatures
 - *Associates that provide signature or initials that undertake monitoring activities that demonstrate inspections, analyses and other essential activities have been trained on proper record completions and editing (single strike edit with initials, no mark-overs, etc)*
- 2.4.8.1 Combined the Environmental Monitoring requirements into one requirement.

Based on risk, an environmental monitoring program, for known or expected concerns, shall be in place for all processes in the manufacture of food sector packaging and if applicable all requirements shall be applied (2.4.8.2, 2.4.8.3, 2.4.8.4). Terminology clarified to use food safety and not refer to food packaging safety

2.7.2.1 Clarification to food fraud

The methods, responsibility and criteria for identifying the site's vulnerability to food fraud motivated by product which may adversely impact the food safety of the packaging sector product.

2.3.2.2 added to meet GFSI FSM 18

Finished product labels shall be accurate, comply with the relevant legislation and be approved by qualified company personnel. When applying print on finished packaging, product ingredient lists(s), allergens, identification codes, and other requirements shall be legible, meet customer and regulatory requirements, and be controlled to ensure accuracy.

Storage & Distribution	Manufacturing of Food Packaging	Manufacture of Pet Food
FSC 26: Food Storage and Distribution	FSC 27: Manufacture of Food Packaging	FSC 32 Manufacture of pet food
Receipt, storage, display, consolidation and distribution of perishable fresh produce and general food lines including chilled, frozen, dry goods, stable or pre-processed and packaged foods and/or food intended for further preparation by the consumer at wholesale level.	<ul style="list-style-type: none"> • Manufacture, storage and transport of food sector packaging materials. • Includes items that may be used in food manufacturing or food service facilities, including paper towel, napkins, disposable food containers, straws, stirrers. 	<ul style="list-style-type: none"> • Dry pet food • Moist pet food • Semi-raw, chilled or frozen pet foods • Pet treats
G - Provision of Storage and Distribution	I -- Production of Food Packaging	D1 - Production of feed
System Elements (Mod 2) (System elements for storage and distribution)	System Elements (Mod 2) (System elements customised to manufacture of food packaging)	System Elements (Mod 2) (System elements customised to plant production)
Module 12 GMP for storage & distribution	Module 13 GMP for manufacture of food	Module 4 GMP for processing of pet food

2.4 Tech Team lessons and recommendations

Pet Food, Storage and Distribution, Food Packaging

Food Packaging (cont.)

Module 13

13.6.2 Includes the Use of Chemicals. Flow was reorganized

13.6.2.1 Hazardous chemicals and toxic substances, including solvents and agents with the potential for contamination of food packaging shall be:

- i. Clearly labeled identifying and matching the contents of their containers;
- ii. Maintained via a current register of all that are stored on site; and
- iii. Supplemented with a current Safety Data Sheet (SDS) made available to all staff.

13.6.2.2 Storage of hazardous chemicals and toxic substances shall:

- i. Kept in an area with appropriate signage indicating that the area is for hazardous storage;
- ii. Be controlled, lockable and accessible only to the personnel trained to utilize them;
- iii. Be well ventilated;
- iv. Ensure that chemicals and substances are stored where intended in a manner to not be comingled (e.g. food versus non-food grade); and
- v. Ensure that chemicals and substances do not present a potential hazard to the finished product or finished product contact surfaces.

13.6.2.3 The use of hazardous chemicals and toxic substances shall be correctly labeled and:

- i. Used in the manner as defined by the manufacturer's instructions;
- ii. Controlled not to potentially contaminate or become a hazard to the raw and packaging material, work-in-progress, finished product or finished product contact surfaces; and
- iii. Controlled in a manner where usage is tracked or ensure return to their appropriate areas of storage after use.
- iv. Be complaint with national and local legislation and designed such that there is no cross-contamination between chemicals;

13.6.2.4 Employees who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals,:

- i. Shall be properly trained with the understanding of how to utilize them;
- ii. Be provided first aid equipment and personnel protective equipment; and
- iii. Ensure compliance to the proper identification, storage, usage, disposal, and cleanup requirement as defined.

13.6.2.5 The site shall dispose of empty, obsolete and unused chemicals, pesticides, toxic substances and empty containers in accordance with requirements and ensure that:

- i. containers are not to be reused;
- ii. containers are segregated and securely stored prior to collection; and
- iii. containers are disposed through an approved vendor.

13.6.2.6 In the event of a hazardous spill, the site shall:

- i. Have spillage cleanup instructions to ensure that the spill is properly contained; and
- ii. Be equipped with spillage kits and cleaning equipment

Storage & Distribution

FSC 26: Food Storage and Distribution

Receipt, storage, display, consolidation and distribution of perishable fresh produce and general food lines including chilled, frozen, dry goods, stable or pre-processed and packaged foods and/or food intended for further preparation by the consumer at wholesale level.

G - Provision of Storage and Distribution

System Elements (Mod 2)
(System elements for storage and distribution)

Module 12
GDP for storage & distribution

Manufacturing of Food Packaging

FSC 27: Manufacture of Food Packaging

• Manufacture, storage and transport of food sector packaging materials.
• Includes items that may be used in food manufacturing or food service facilities, including paper towel, napkins, disposable food containers, straws, stirrers.

I -- Production of Food Packaging

System Elements (Mod 2)
(System elements customised to manufacture of food packaging)

Module 13
GMP for manufacture of food packaging

Manufacture of Pet Food

FSC 32 Manufacture of pet food

• Dry pet food
• Moist pet food
• Semi-raw, chilled or frozen pet foods
• Pet treats

D1 - Production of feed

System Elements (Mod 2)
(System elements customised to plant production)

Module 4
GMP for processing of pet food

2.5 Key changes to meet GFSI 2020 (BR8)

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 a customer or regulations, **or as a minimum in excess of the product shelf-life** -- *added to meet GFSI*

2.3.2.2 All raw materials, packaging and ingredients shall comply with **specifications** and with the relevant legislation in the country of manufacture and country of destination, if known -- *added to meet GFSI*

2.4.4.2 Product analyses shall be conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods, and in accordance with the **applicable requirements of ISO/IEC 17025**. -- *modified to meet GFSI (to be further defined)*

2.7.1.1 A food defense **threat assessment** shall be conducted to identify potential threats caused by a deliberate act of sabotage or terrorist-like incident. -- *added to meet GFSI*

Part A will be posted for public comment on July 15th

Key Changes to Part A:

Audit duration

- Replace the audit duration table with minimum requirements as per GFSI (min 0.5 days for primary, 2 days for manufacturing, 1 day for storage)

Remote audits

- When finalized by GFSI, to be incorporated into Part A (use of ICT)

Audit scoring

- Clarify definitions of major and minor non-conformities
- Majors to be 5 points (currently 10 points)
- No change in ratings
- Long term – weighting of elements (clauses) to be considered

Unannounced audits

- Revision to meet GFSI requirements of once every three years

Suspensions/Withdrawals

- Clarification of suspension/withdrawal process

3.

Part A:

Implementing

and

Maintaining

the SQF Code

Quality Code

Apply to all SQF food manufacturing, petfood manufacturing, animal feed manufacturing and food packaging FSCs

Not applicable

System Elements

(System elements for Quality)

- Revise Quality Code to be applicable across all GFSI benchmarked CPs
- GFSI Technical elements to be used as a foundation to rebuild the Quality Code
- As a stand-alone standard, the numbering and lay-out does not need to follow the food safety codes

4. The Quality Code

5. Appendices

SQF Food Sector Categories	<ul style="list-style-type: none">• FSC category table to be revised following TAC/CB meeting (no changes anticipated)• GFSI allocation to be changed as per GFSI 2020
Glossary	<ul style="list-style-type: none">• Additions and changes from TWG input• To be revised by LeAnn, Frank, Bill once Codes are finalised
SQF Logo Rules for Use	<ul style="list-style-type: none">• No significant changes. Review once Codes finalised
Multi-site Certification	<ul style="list-style-type: none">• Frank is devising multi-site requirements to meet GFSI 2020
Quality Shield (Quality Code Only)	<ul style="list-style-type: none">• No significant changes. Review once Quality Code finalised

6. Next Steps

	Part B (Food Safety, Quality)	Part A	Appendices	Support Docs (Training, Guidance)	Resources
May 20	<ul style="list-style-type: none"> Prepare key changes for TAC/CB meetings 		<ul style="list-style-type: none"> Continue draft Appendices 		
Jun 20	<ul style="list-style-type: none"> Present key changes to TAC/CBs Make any changes based on TAC/CB input Create drafts of animal feed, livestock, seafood 		<ul style="list-style-type: none"> Finalise multi-site drafts Finalise FSC table 		
July 6th	<ul style="list-style-type: none"> identify priority codes and language for translations meet with Transperfect to introduce new formatting 				
Jul 20	<ul style="list-style-type: none"> Publish draft food safety codes and quality code for public comment 	<ul style="list-style-type: none"> Finalise Part A 	<ul style="list-style-type: none"> Review and finalise all appendices 	<ul style="list-style-type: none"> Start revisions of training materials – Implementing, quality, auditor 	<ul style="list-style-type: none"> Provide Daniel/ReposiTrak with draft codes
Aug 20	<ul style="list-style-type: none"> Review public comments, incorporate as appropriate 	<ul style="list-style-type: none"> Customise Part A for individual food safety and quality codes 	<ul style="list-style-type: none"> Consolidate appendices with the relevant codes 	<ul style="list-style-type: none"> Start revisions of guidance documents, auditor, CB, consultant and trainer criteria 	
Sep 20	<ul style="list-style-type: none"> Proof all the final Code documents, consolidate Parts A, B and appendices, and ensure final documents are ready for publication in LucidPress 				<ul style="list-style-type: none"> Commence selected translations of edition 9 Codes
Oct 20	<ul style="list-style-type: none"> Publish all Food Safety Codes and launch at SQF Conference 27 – 29 Oct 			<ul style="list-style-type: none"> Start selected translations of training materials 	<ul style="list-style-type: none"> Develop ReposiTrak checklists and audit tools
Nov 20	<ul style="list-style-type: none"> Preparation and submission of GFSI re-application to GFSI 2020 			<ul style="list-style-type: none"> Start communication with all key stakeholders 	

Submitting Comments

Edition 9 Public Comment

We have been updating *SQF Food Safety and Quality Codes* with the help of our Technical Advisory Council, certification bodies, training centers, and commodity-specific Technical Working Groups.

All *Food Safety Codes* will be submitted to the Global Food Safety Initiative (GFSI) 2020 Benchmarking Requirements for all industry scopes with GFSI requirements.

We welcome your *Food Safety Code* **comments and suggestions by July 31, 2020.**

To view and download the draft *Codes* and submit comments, please visit sqfi.com or click [here](#).