SQF Edition 9: Ask Us Anything
Webinar focused on:
Culture and Internal Laboratory Methods

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Introductions

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Today’s Agenda

Overview and discussion on SQF Edition 9.0 Requirements

► Food Safety Culture
  ► Code Changes
  ► A Practical Approach to Compliance and Improvement
  ► Q&A

► Proficiency Testing (ISO/IEC 17025)
  ► Code Changes
  ► Good Laboratory Practices / Practical Approaches
  ► Q&A

► Additional Edition 9.0 Questions
Culture Requirements are Not New

**Edition 8.1 Required:**
- Commitment to supply safe food
- Commitment to establish and review food safety objectives
- Provision of resources to support the system
- Training and communication

**Edition 9.0 Clarifies/ Adds:**
- Commitment to establish and maintain food safety culture
- Management support and leadership
- Positive encouragement and empowerment
- Organizational alignment
- Measurement of culture related performance
Components for Culture in Edition 9.0

Food Safety Codes
2.1.1.1 – “Policy statement outlines at a minimum the commitment of all site management to…
ii. Establish and maintain a food safety culture within the site.”

2.1.1.2 “Senior site management shall lead and support a food safety culture within the site…”

v. “Staff…are held accountable for meeting these requirements.”

2.1.1.3 – “Site Management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.”

Quality Code

2.1.1.3 Senior site management shall implement, maintain, and continuously improve the quality culture within the site.

Basically – say it, lead and do it, and respond to it.
Effectiveness of a food safety management system and status of a food safety culture are interdependent.

- The System defines methods, actions, and expected outcomes.
- Culture influences the attitudes and behavior underpinning how or how well outcomes are achieved.
- The System supports culture providing plans and resources.
Management Commitment

Previous Requirements

- Prepare and implement a policy statement that outlines at a minimum the:
  1. Commitment to supply safe food.
  2. Methods to comply with customer and regulatory requirements.
  3. Methods to improve.
  4. Commitment toward objectives.
The Concern = Shallow Compliance

- Policy statements outline words about commitment and methods
- Employees learned (some) words
- Many, many, statements made of the same words
- Methods listed generically as ‘HACCP’ and ‘Routine Meetings’
- Objectives not always about food safety
- No indication of actual company values
- No indication of the core of the company and ‘who they are’ as business partners
Establish Food Safety Culture

Commit to establish *and* maintain a **food safety culture**.

How?

At a minimum, update your policy then, further define commitment. Commit to establishing and maintaining fully shared values, beliefs and norms that affect mindset and behavior toward safer processes and products.*

*See SQF Code Glossary for additional detail
Norms are the Easy Part

Commit to establishing and maintaining norms that impact safety

How?

Identify the expected **key** behaviors
(e.g. defined by SOPs, CCPs, GMPs)

Share evidence these are documented and emphasized.
Beliefs and Values: The Harder Part

Evaluate current values and those to be fostered

- Discipline/Order?
- Cost Awareness?
- Rewards / Fun?
- Risk Awareness?
- Focus on Detail?
- Teamwork?
- Leadership?
- Pride?
- Creativity?

Establish (define, document, communicate)

Maintain (support, measure, facilitate)
Management Should Lead

• Start small and be realistic.
• Many sites' first goal was to become SQF certified.
• It takes time to define current and desired status.
• There is no ‘perfect’. Auditors expect to see the journey.
Communicate and Measure Results

Develop objective evidence by observations, interviews, or other data. Examples:

- Interview about awareness of the norms and values
- Measure implementation: training records and results, feedback forms
Respond to Results

Documented monthly or annual meetings show involvement from all levels

• Respond to measurements
• Adjust the approach
• Increase or alter the training
• Change directions to facilitate food safety culture and other measurable goals
Culture is an Inescapable (Mandatory) Journey

Your culture is already present. The goal and journey is to *intentionally* shape it toward food safety and demonstrate this by:

- Declaring and sharing values and beliefs
- Reinforcing attitudes and behaviors
- Empowering and engaging employees
- Working toward improvement.
Questions / Discussion?
Learning Objectives

- In-house lab testing requirements
- Lab Staff proficiency testing
- External Lab requirements
Internal Laboratory Requirement Element

2.4.4.2 Where internal laboratories conduct input, environmental, or product analysis, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025 including annual proficiency testing.

Key topics:

1. What types of testing does this include?
2. What parts of ISO / IEC 17025 might apply?
3. What is expected of proficiency testing?
What Testing is Included?

- If the Certification Scope is for food safety, this applies to analyses of food safety parameters.

- 2.4.4.2 includes inputs, environmental, or product testing. (In primary SQF codes, see clause 2.4.4.1)

- The SQF Glossary includes analysis of ingredients, materials, work-in-progress, or finished products for microbiological, chemical, or physical analyses.
SQF Quality Code Section 2.4.4

- 2.4.4.2: On-site labs shall be equipped and resourced to enable testing of in-process and finished products to meet customer, regulatory and/or company requirements and meet quality objectives.

- External labs shall be accredited to ISO 17025 or an equivalent international standard and included on the site’s contract services specifications list (2.3.2.7).

- (Note that proficiency testing of on-site lab personnel is not an SQF requirement for Quality testing.)
Sites Should Include Tests Based on Impact

- Although not required, a risk assessment is highly recommended.

- Define how the site decided to include or exclude tests or personnel based on risk.

- Include considerations of the reason for the testing and the impact of results if test is done incorrectly.
Examples of Tests Potentially Included

Sample Types
- Raw materials, ingredients, work–in–progress and finished product
- Water, ice, air, or compressed air

Test Types
- All pathogen sampling and testing
- Tests to verify/validate CCP limits
- Allergen tests to verify/validate sanitation management
Likely Examples

- Testing pH of acidified product.
- Testing water activity where it is a critical limit.
- Testing surfaces for allergens post clean-up.
Less Likely Examples

- Tests not within the scope of certification.
- Tests not done in the onsite lab, not complex, or not closely related to risk.
  - Checking calibration and use of a scale to meet net weight.
  - Checking temperature of cold storage areas, product or ingredients not a CCP.
  - Using test strips to determine the correct dilution of sanitizer.
  - Quality tests such as viscosity, color, flavor.
- Sampling techniques that do not impact risk-related outcomes.
What Parts of ISO / IEC 17025 Apply?

- The goal is to demonstrate competence and consistency in sampling and testing, not just provide records of completed training.

- Participation in proficiency testing where available and appropriate.
Items already in the SQF Code/Addressed Elsewhere

- Impartiality and Confidentiality
- Structure, Resource and General Facilities Requirements
- Competency and training
- Calibration and traceability
- Contracted services, contract review
- Reporting format and record keeping
- Lab management system (complaints, errors, internal audits etc.)
Applicable Parts of the ISO 17025 Standard

- Proficiency Testing
- Use of validated methods
  - Likely use of externally validated methods will suffice (e.g. a recognized method)
- Sampling
  - A sampling plan should be defined
  - Samples should be taken to be representative and unadulterated
  - Sample records should have detail
What is Expected of Proficiency Testing?

Proficiency Testing calibrates the performance of laboratory personnel and in-process testers who conduct microbiological, chemical, or physical analysis of ingredients, materials, work-in-progress, finished products, and the processing environment by means of interlaboratory comparisons.
What is Interlaboratory Comparison?

An evaluation of measurements or test results obtained from two or more laboratories under preplanned conditions, on the same or similar items.
How to Achieve Interlaboratory Comparison?

- Contracted Service
- Intercompany laboratories
- Your onsite lab performs the same test on the same sample lot as an outside lab, and compares results
<table>
<thead>
<tr>
<th>Good Lab Practices</th>
<th>Proficiency Test</th>
<th>External Lab</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detail SOP for <strong>critical</strong> food safety tests</td>
<td>Accurate execution of SOP for test</td>
<td>Evidence of accreditation</td>
<td>Does it meet FDA (FSMA) or other country requirements (if applicable)</td>
</tr>
<tr>
<td>Training for personnel</td>
<td>Test aligns with lab test design</td>
<td>Method for choosing which tests are sent out</td>
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Define Expectations

Never test without a plan to respond to results.

Set criteria prior to implementing testing including proficiency testing.

All the ed 9 codes are available for download now at www.sqfi.com main page.
Additional Resources

- GFSI Position Paper on Food Safety Culture
  - [Full Version] | [Summary]
- SQF Webinar: In-House Lab Requirements
- SQFI/EAGLE Blog: Where to Begin in Developing Your Food Safety Culture
- Food Safety News Article: Food Safety Culture: What to do now that everyone is watching?
Questions / Discussion?
Thank you!

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