



# Food Safety Code: Manufacture of Food Packaging, Edition 9

## System Elements – Key Changes

Edition 8.1		Edition 9	
2.1 Management Commitment	2.1.1 Food Safety Policy (Mandatory) 2.1.2 Management Responsibility (Mandatory) 2.1.3 Management Review (Mandatory) 2.1.4 Complaint Management (Mandatory) 2.1.5 Crisis Management Planning	2.1 Management Commitment	2.1.1 Management Responsibility (Mandatory) 2.1.2 Management Review (Mandatory) 2.1.3 Complaint Management (Mandatory)
Summary of changes: <ul style="list-style-type: none"> <li>• Combined, consolidated, and removed duplication of requirements.</li> <li>• Clarified intent behind the requirement.</li> <li>• Added food safety culture (2.1.1.1 and 2.1.1.2).</li> <li>• Added requirement for substitute for SQF practitioner.</li> <li>• Added requirement site is staffed and organized to meet food safety objectives.</li> <li>• Moved Crisis Management Planning to 2.6.3 Recalls and Withdrawals.</li> </ul>			
2.2 Document Control and Records	2.2.1 Food Safety Management System 2.2.2 Document Control (Mandatory) 2.2.3 Records (Mandatory)	2.2 Document Control and Records	2.2.1 Food Safety Management System (Mandatory) 2.2.2 Document Control (Mandatory) 2.2.3 Records (Mandatory)
Summary of changes: <ul style="list-style-type: none"> <li>• Clarified the required elements to be included in the food safety management system with examples including specifications, process controls impacting food safety, and food safety regulations (2.2.1.1)</li> <li>• Added requirement for retention periods to consider the shelf life of the product. (2.2.3.3)</li> </ul>			



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Edition 8.1		Edition 9	
2.3 Specification and Product Development	2.3.1 Product Development and Realization 2.3.2 Raw and Packaging Materials 2.3.3 Contract Service Providers 2.3.4 Contract Manufactures 2.3.5 Finished Product Specifications	2.3 Specifications, Formulations Realization and Supplier Approval	2.3.1 Product Formulation and Realization 2.3.2 Specifications (Raw Material, Packaging, Finished Product and Services) 2.3.3 Contract Manufacturers 2.3.4 Approved Supplier Program (Mandatory)
<p>Summary of Changes:</p> <ul style="list-style-type: none"> <li>• Added detail regarding product formulations to include development by authorized persons and review when there are changes in materials, ingredients, or equipment.</li> <li>• Added process flow to 2.3.1.5.</li> <li>• All specifications summarized under 2.3.2 and includes service providers.</li> <li>• 2.3.2.10 about having procedures for correct printing plates, etc. used in printing was moved from the former 2.5.4.</li> <li>• Added: suppliers to notify the site of changes in product composition that could have an impact on product formulation.</li> <li>• Added Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.</li> <li>• Approved supplier moved to 2.3.4 (formerly 2.4.4).</li> </ul>			



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Edition 8.1		Edition 9	
2.4 Food Safety System for Manufacture of Food Packaging	2.4.1 Food Legislation (Mandatory) 2.4.2 Good Manufacturing Practices (Mandatory) 2.4.3 Food Safety Plan (Mandatory) 2.4.4 Approved Supplier Program (Mandatory) 2.4.5 Non-conforming Product or Equipment 2.4.6 Product Rework 2.4.7 Product Release 2.4.8 Environmental Monitoring	2.4 Food Safety System	2.4.1 Food Legislation (Mandatory) 2.4.2 Good Manufacturing Practices (Mandatory) 2.4.3 Food Safety Plan (Mandatory) 2.4.4 Product Sampling, Inspection, and Analysis 2.4.5 Non-conforming Materials and Product 2.4.6 Product Rework 2.4.7 Product Release (Mandatory) 2.4.8 Environmental Monitoring
Summary of Changes: <ul style="list-style-type: none"> <li>• Product sampling now under 2.4.4 (formerly 2.5.4).</li> <li>• Testing and analysis now includes reference to internal as well as external laboratories. Proficiency testing included in 2.4.4.2 (formerly 2.5.4.2).</li> <li>• Non-conforming equipment moved to 13.1.6.4.</li> <li>• Positive product release procedure in 2.4.7.2.</li> </ul>			



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Edition 8.1		Edition 9	
2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory) 2.5.2 Verification Activities (Mandatory) 2.5.3 Corrective and Preventative Action (Mandatory) 2.5.4 Product Sampling, Inspection and Analysis 2.5.5 Internal Audits and Inspections (Mandatory)	2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory) 2.5.2 Verification Activities (Mandatory) 2.5.3 Corrective and Preventative Action (Mandatory) 2.5.4 Internal Audits and Inspections (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> <li>Added detail to where deviations from food safety requirements may occur (2.5.3.1).</li> </ul>			
2.6 Product Identification, Trace, Withdrawal and Recall	2.6.1 Product Identification (Mandatory) 2.6.2 Product Traceability (Mandatory) 2.6.3 Product Withdrawal and Recall (Mandatory)	2.6 Product Traceability and Crisis Management	2.6.1 Product Identification (Mandatory) 2.6.2 Product Trace (Mandatory) 2.6.3 Product Withdrawal and Recall (Mandatory) 2.6.4 Crisis Management Planning
Summary of Changes: <ul style="list-style-type: none"> <li>Added Crisis Management Planning to 2.6.4 (formerly 2.1.5).</li> <li>Emphasized labeling requirements and checks during operations to ensure that the correct product is in the correct package and with the correct label.</li> <li>Added requirements for testing the recall system to include products from different shifts and for materials across a range of products and customers.</li> </ul>			



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Edition 8.1		Edition 9	
2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud	2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> <li>Consolidated to include all food defense and food fraud (from approved supplier)</li> <li>Clarified some of the requirements for each program.</li> </ul>			
2.8 Allergen Management	2.8.1 Allergen Management and Food Manufacturing (Mandatory)	2.8 Allergen Management	2.8.1 Allergen Management (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> <li>Minimal wording changes only.</li> </ul>			
2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory) 2.9.3 Instructions 2.9.4 HACCP Training Requirements 2.9.6 Refresher Training 2.9.7 Training Skills Register	2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory)
Summary of Changes: <ul style="list-style-type: none"> <li>Training consolidated down to two sections - 2.9.1 Training Requirements and 2.9.2 Training Program.</li> <li>Added training requirements for the following tasks:               <ul style="list-style-type: none"> <li>Sampling and test methods</li> <li>Environmental monitoring for relevant staff.</li> <li>Allergen management, food defense, and food fraud for all relevant staff.</li> </ul> </li> </ul>			



# Food Safety Code: Manufacture of Food Packaging, Edition 9

## Module 13 – Key Changes

Edition 8.1		Edition 9	
13.1 Site Location and Construction	13.1.1 Premises Location and Approval	13.1 Site Location and Premises	13.1.1 Premises Location and Approval 13.1.2 Building Materials 13.1.3 Lighting and Light Fittings 13.1.4 Dust, Insect, and Pest Proofing 13.1.5 Ventilation 13.1.6 Equipment and Utensils 13.1.7 Grounds and Roadways
Summary of Changes: <ul style="list-style-type: none"> <li>• 13.1 Site Location and Premises now covers 13.1.1 Premise Location and Approval; 13.1.2 Building Materials; 13.1.3 Lighting and Light Fittings; 13.1.4 Dust, Insect, and Pest Proofing; 13.1.5 Ventilation; 13.1.6 Equipment and Utensils; and 13.1.7 Grounds and Roadways.</li> <li>• Equipment storage rooms moved to storage (13.6).</li> <li>• 13.1.6 includes non-conforming equipment from 2.4.5 in edition 8.1.</li> </ul>			
13.2 Construction of Premises and Equipment	13.2.1 Materials and Surfaces 13.2.2 Floors, Drains and Waste Traps 13.2.3 Walls, Windows, Doors and Ceilings 13.2.4 Lightings and Light Fittings 13.2.5 Dust, Insect and Vermin Proofing 13.2.6 Ventilation 13.2.7 Equipment, Utensils and Protective Clothing	13.2 Site Operation	13.2.1 Repairs and Maintenance 13.2.2 Maintenance Staff and Contractors 13.2.3 Calibration 13.2.4 Pest Prevention 13.2.5 Cleaning and Sanitation

	13.2.8 Premises and Equipment Maintenance 13.2.9 Calibration 13.2.10 Pest Prevention 13.2.11 Cleaning and Sanitation		
<p>Summary of Changes:</p> <ul style="list-style-type: none"> <li>• 13.2 Site Operations. Includes 13.2.1 Repairs and Maintenance; 13.2.2 Maintenance Staff and Contractors; 13.2.3 Calibration; 13.2.4 Pest Prevention; and 13.2.5 Cleaning and Sanitation.</li> <li>• 13.2.2 Maintenance Staff and Contractors has been separated out from what was 13.2 Construction of Premises and Equipment.</li> <li>• Pest prevention restructured and clarified.</li> </ul>			

Edition 8.1		Edition 9	
13.3 Personnel Hygiene and Welfare	13.3.1 Personnel 13.3.2 Hand Washing 13.3.3 Clothing 13.3.4 Jewelry and Personal Effects 13.3.5 Visitors 13.3.6 Staff Amenities 13.3.7 Change Rooms 13.3.8 Sanitary Facilities 13.3.9 Lunch Rooms	13.3 Personnel Hygiene and Welfare	13.3.1 Personnel Welfare 13.3.2 Handwashing 13.3.3 Clothing and Personal Effects 13.3.4 Visitors 13.3.5 Staff Amenities (change rooms, toilets, break rooms)
Summary of Changes: <ul style="list-style-type: none"> <li>• 13.3.2 Combined references to signage for handwashing.</li> <li>• 13.3.3 Clothing and Personal Effects. (was “Clothing”) Includes laundering, protective clothing, and jewelry.</li> <li>• 13.3.5 Staff Amenities includes change rooms, toilets, and break rooms.</li> </ul>			
13.4 Personnel Processing Practices	13.4.1 Staff Engaged in Manufacture, Handling, and Storage of Food Contact Packaging	13.4 Personnel Processing Practices	13.4.1 Staff Engaged in Product Handling and Processing Operations
Summary of Changes: <ul style="list-style-type: none"> <li>• Differentiated requirements for staff personnel working in or visiting food handling areas. Some of the requirements in 13.4 were previously in 13.3.</li> <li>• The Process Flow requirements, formerly in 13.7.1, are now in 13.4.1.3 and 13.4.1.4.</li> </ul>			



Edition 8.1		Edition 9	
13.5 Water and Air-Supply	13.5.1 Water Supply 13.5.2 Water Quality 13.5.3 Air Quality	13.5 Water, Ice, and Air Supply	13.5.1 Water Supply 13.5.2 Water Quality 13.5.3 Air and Other Gases
Summary of Changes: <ul style="list-style-type: none"> <li>Added requirements for testing the backflow system (13.5.1.2).</li> </ul>			
13.6 Storage and Transport	13.6.1 Storage and Handling of Materials, Food Packaging, and Transport 13.6.2 Storage of Food Packaging and Materials 13.6.3 Use, Storage of Hazardous Chemicals and Toxic Substances 13.6.4 Loading, Transport and Unloading Practices 13.6.5 Loading/Unloading	13.6 Receipt, Storage and Transport	13.6.1 Storage of Materials and Product 13.6.2 Storage and Use of Hazardous Chemicals and Toxic Substances 13.6.3 Loading, Transport, and Unloading Practices
Summary of Changes: <ul style="list-style-type: none"> <li>There is a new requirement (13.6.1.6) to have procedures for effectively storing printing plates and other applicable printing tools.</li> <li>13.6.1.5 was formerly 13.6.2.1.</li> <li>New requirements have been added to 13.6.2, Storage and Use of Hazardous Chemicals and Toxic Substances (was 13.6.3 in edition 8.1).</li> <li>13.6.2: Storage of chemicals also applies to chemical storage references in 13.2.4 Pest Prevention.</li> <li>Former sections 13.6.4 and 13.6.5 have been consolidated into 13.6.3.</li> <li>A new requirement is now in 13.6.3 regarding securing transport vehicles (13.6.3.3).</li> </ul>			

Edition 8.1		Edition 9	
13.7 Separation of Function	13.7.1 Process Flow 13.7.2 Control of Foreign Matter Contamination 13.7.3 Managing Foreign Matter Contamination Incidents	13.7 Separation of Functions	13.7.1 Control of Foreign Matter Contamination 13.7.2 Managing Foreign Matter Contamination Incidents
Summary of Changes: <ul style="list-style-type: none"> <li>The Process Flow requirements have been moved to Personnel Processing Practices in 13.4.1.3 and 13.4.1.4.</li> <li>Clarification was added to several of the requirements in 13.7.</li> <li>A requirement for prohibiting the use of snap-off blades has been added to the clause on knives and cutting tools. (13.7.1.8).</li> </ul>			
13.8 Waste Disposal	13.8.1 Dry and Liquid Waste Disposal	13.8 Waste Disposal	13.8.1 No Heading
Summary of Changes: <ul style="list-style-type: none"> <li>Clarification was added to several of the requirements in 13.8 (e.g., 13.8.1.1 and 13.8.1.2).</li> <li>Added 13.8.1.5 on requirements for the controlled disposal of trademarked or printed packaging materials.</li> </ul>			
13.9 Exterior	13.9.1 Grounds and Roadways		
Summary of Changes: <ul style="list-style-type: none"> <li>Former 13.9.1 has been incorporated into 13.1.7, Grounds and Roadways, in Section 13.1, Site Location and Premises.</li> </ul>			