

## About the Webinar

**1. Is this webinar recorded?**

Yes, the Ask Us Anything Webinar is recorded and can be found on the SQFI website via this link.

**2. Will a transcript of Q&A's be available after the webinar?**

A direct, written transcript of the presenters' answers will not be available. However, this document encompasses all the questions that was asked, the answers that were given, and more. Please refer to the webinar recording should you want to listen to the presenters' answers.

**3. Will we have a webinar similar to the Ask Us Anything webinar later down the line? We might have more questions when we start implementing the Edition 9.**

Yes, we will host more *Edition 9* Implementation webinars. You can find a list of all past, recorded *Edition 9* webinars on the SQFI website via this [link](#). Be sure to check out our [Events and Training page](#) for upcoming *Edition 9* webinars and [subscribe to our Training Newsletters](#) to get the latest resource and training updates.

## Implementation

**1. What is the timeline for the Edition 9 checklists and/or guidance documents to be available for download? Will there be guidance documents for the food packaging industry as well?**

The checklists, change documents, and numbering change documents are in the [Resource Center](#) on sqfi.com. We are currently working on the guidance documents starting with the Food Manufacturing Code with an expected release date of early February. The other guidance documents, including packaging will follow soon after.

**2. When will Edition 9 be available in Spanish?**

Translations are currently underway for all our key languages (Spanish, Portuguese, French Canadian, Japanese, and Chinese). All our translations, including Spanish, will be ready by the end of March.

**3. For a recertification audit - if the desk audit is prior to May and the onsite is after May would we be looking at Edition 9?**

There is no desk audit requirement for initial or recertification audits. If your recertification audit is scheduled for May 24th or after, then the site will be audited against the edition 9 Code.

**4. Has SQF changed its method of setting the length of the audit based on number of employees and square footage of the facility?**

SQF removed the audit duration table and incorporated minimum audit duration days, following GFSI recommendations. The audit duration table can still be used as a guide by CBs, if needed.

**5. Is there a possibility that the mandatory date for Edition 9 will be postponed due to the pandemic?**

Never say never but it is highly unlikely that the implementation date of May 24th will be changed.

## Food Safety Culture

**1. We are concerned about how to demonstrate compliance towards establishing and maintaining a food safety culture.**

Compliance can be demonstrated first with a documented commitment to a program facilitating culture. This can be further clarified by indicating more specifically what that means to you, your process, facility, staff, and existing culture. Your efforts might include a training or communication plan with the time or resources needed included in the plan. Methods of encouragement and empowerment could be demonstrated with a reward program and comment boxes or open door / management listening sessions promoting communication. Demonstrating maintenance of the program can be like demonstrating maintenance of other prerequisite programs where goals are reviewed and discussed in routine meetings and as part of management review.

**2. Do you need one document to address food safety culture or can your food safety culture be achieved within several documents?**

SQF does not dictate how to achieve the goal. The important factor is your ability to demonstrate you have met the code, in your own way.

**3. How do we drive food safety culture when all face-to-face meetings have been eliminated due to COVID?**

Physical distancing has had a great impact on most aspects of our business lives. While many things continue to evolve, this is not happening outside of your current culture, and should not prevent implementing efforts toward a stronger food safety culture. Conversations can still occur, simple goals set, encouragement provided, and progress measured.

**4. How would an auditor assign NCs for food safety culture?**

AN NC can be assigned if there is absence of evidence of communication, declared objectives and efforts towards those objectives regarding culture. An NC would not likely be issued for failure to achieve certain aspects of culture as this is and always will be an on-going effort.

**5. Would an annual food safety and quality policy employee presentation coupled with competency testing help with compliance?**

Yes, it helps. If your company defines its goal as furthering a food safety culture through increased competency, this can be used to support your program. Encouraging, rewarding, and expecting competency can be core values you attribute to your culture.

**6. How do we demonstrate that we have great food safety culture? for example, how would you measure 'interviews'?**

With anything new, starting with simple goals is a good step. Make a simple plan, then measure how many interviews or surveys you planned to do compared to how many were done. Early in the process, interviews or anonymous surveys can be used to identify at all levels of the organization what staff perceive to be the current company values (positive and negative). Later, after selecting a focus for improvement a second round of similar surveys could be used to evaluate the impact.

**7. What is food safety culture as it pertains to SQF and how can I create objective evidence of its implementation?**

Food safety culture is defined in the Glossary in Appendix 2. Within that definition there are solid suggestions to demonstrate compliance by measuring or documenting communication, responsibilities, employee feedback, and training.

**8. 2.1.2 Management Review-only reviews changes made since pervious review? Does reviewing the hazard and risk management system refer to your HACCP plan?**

Management review indicates the SQF System shall be reviewed. This implies an overview of the entire system with emphasis on the details provided under 2.1.2.1. The hazard and risk management system may include a HACCP or Food Safety Plan in addition to any risk assessments that have been developed as part of the system.

**9. What would be some examples of questions for a Food Safety Culture interview?**

- What values or attributes do you consider important to food safety?
- What values or beliefs harm food safety?
- Which of the above values do you see in place or encouraged at our company today?
- Why?
- Do you have suggestions on how to encourage more of a food safety culture?

**10. Just to recap: First step is gap assessment in compliance to the Edition 9. Is this correct?**

A gap assessment is beneficial but not mandatory. An alternate approach could be to add Edition 9 components to your system as soon as practical and begin to evaluate compliance through your internal auditing program.

**11. I create an internal questionnaire that shows that we have obtained feedback from the employees. Maintain this on file. Now, how do we make it quantitative or measurable in terms of whether we have or have not achieved the cultural requirement? After that, what will the inspector find acceptable as evidence of a food safety culture being achieved by a company?**

As with many programs, the code indicates the fundamental requirement, then you determine specific methods and set goals. It is not the auditors' role to determine a "correct" way to foster a food safety culture. It is their role to determine if efforts are being made and can be demonstrated per the code requirements.

**12. What will the auditors be looking for?**

Examples of what auditors will be trained to find include:

- A policy statement that includes commitment to a food safety culture.
- Evidence of management leadership and support (E.g., attendance at meetings, setting of goals)
- Documented goals pertaining to a food safety culture
- Evidence of employee encouragement (E.g., reward programs or reviews that include food safety culture)
- Evidence of employee empowerment (E.g., policies in place to allow food safety to be communicated and acted upon at all levels as appropriate to the job)

## Internal sampling and Testing

**1. If environmental swabs are performed by internal staff, but samples are sent to an outside accredited lab, does proficiency testing apply to the internal staff?**

No, proficiency testing does not apply if you are not performing the lab testing at your site. The staff will need training and instruction on how to swab properly which could be obtained from the lab or other internal resources.

**2. One of our important quality release specs uses a proprietary in-house assay particular to our product, that is performed at the parent company which does not hold 3rd party certifications but is cGLP and does have a quality management system with things like document control, deviations, calibrations, etc.. Are we SQF-compliant?**

Your question mentions a quality spec; if that is not a food safety /microbiological test, this does not need to be included in proficiency testing and the lab requirement.

- 3. We do not have an internal lab but do internal ATP testing. We also do swabs for the EMP, but this is sent to an external ISO lab. How do we validate our swabbing methods to meet SQF requirements?**

ATP testing is not microbiological testing. If you are using ATP for monitoring a food safety risk, you will be expected to develop a procedure for validating that the correct swabbing methods are done by your internal staff. The manufacturer of the swab likely can provide instructions on how to swab correctly and how to ensure the ATP device maintains accuracy.

- 4. Since our produce is frozen, TPC, mold, yeast all fall under quality testing. Do we still need proficiency testing for those?**

Proficiency testing is not a requirement for quality testing.

- 5. Where do I find a test that works with the plastic my facility manufactures?**

The first place to start is with conducting a risk assessment to determine which pathogens are likely to grow on plastic. Another idea is to consult with a lab and your industry association, such as IoPP or the Plastics Industry Association.

- 6. What is the best way to conduct proficiency testing for environmental pathogens? Side by side sampling does not work for unevenly distributed environmental pathogens and we do not want to introduce pathogens into our internal lab.**

The focus for proficiency testing is on the lab methodology not so much the sampling routine since there may be less error in that. Suggest you look at some periodic outsourcing of a duplicate sample and compare that to internal.

- 7. Would GR&R be sufficient for proficiency testing evidence?**

A properly design Gauge R&R study would indicate if there is variation or error in the use and application of an instrument used internally for a food safety parameter of importance. Gauge R&R is also of value for quality parameter, but this may or may not be applicable to the SQF quality code.

- 8. What would be a significant difference in a lab for it to be non-compliant for proficiency?**

The code does not prescribe a level of difference in the proficiency process. The site will need to know the variance expected in a lab analysis and use that to determine when two compared results would be of concern for accuracy.

- 9. Does a lab that is a USDA Accredited Laboratory also need ISO 17025 accreditation?**

Probably, yes. USDA labs are only approved labs to USDA standards, but not all the USDA labs are specifically accredited to ISO 17025.

**10. Can we determine through risk analysis which tests are critical to food safety and need to align to 17025, or does it apply to all our lab tests?**

Yes, your risk analysis (food safety plan will lead you to determine which tests are critical to food safety- focus on CCPs, Critical Limits, kill steps, control measures etc. Determine which tests require procedures that align with 17025. Note, this does not apply to quality parameters.

**11. Regarding 2.4.4.5 in the SQF Code, are there regulatory guidelines for retention samples?**

Yes, some food industry sectors have guidelines for retention samples. Customers may also provide requirements for retention samples.

**12. I was instructed, during PCQI training three years ago, to allow only ISO 17025 or a2LA certification for external labs. When we get to 11.5 of the SQF Code, the bulk of the lab certifications turn-out to be NELAP, NELAC, EPA, etc. - just fine for environmental testing but not an ISO 17025 or a2LA. What I've done for years is accept NELAC / NELAP / EPA for environmental only and require 17025 and a2LA for Environmental pathogen testing or similar. Your thoughts?**

Assuming that environmental testing is not food safety related, then yes pathogen testing through 17025 accredited labs is the correct approach.

**13. What about an in-house laboratory's participation in a Check Sample Program? Would this meet the requirement for proficiency testing? Check Sample refers to when a certified lab sends out a sample to a variety of labs for a series of tests. The in-house lab performs the tests and reports the results. The certified lab then shows the results in comparison with peer labs.**

Yes, this is one acceptable example of lab proficiency testing.

**14. What should we demonstrate to establish competency for our ATP or allergen swabbing?**

ATP and allergen swabbing are not considered microbiological test methods which are included in 2.4.4.2, so proficiency testing of the use of swab techniques would not be evaluated during the audit. You can choose to develop calibration methods to build competency and consistency among your staff who are doing swabs, and you may want to speak with your swab supplier for best practice swab methods.

**15. If the lab utilized for testing is not ISO accredited, but the lab is an FDA testing laboratory and a FERN laboratory member, and they undergo proficiency testing with other labs, can this lab be used in lieu of ISO testing labs?**

The site would need to illustrate that the process for approval and acceptance of a lab as a FERN member is equivalent to ISO 17025. Suggest the lab should be able to provide that to the site which in turn can illustrate to the auditor and CB.

**16. Our customer takes their product to warehouse and then waits for micro release. When they do the release; does it comply with SQF requirements?**

This depends on who is responsible to perform the micro testing; if it is your responsibility, then you will have to show evidence of proficiency testing and your lab complying with the applicable parts of ISO 17025. Also ensure that the communication of result and ultimate release or hold by the customer is explained within your product release procedure (2.4.7.1).

**17. In 2.4.4.2 of the SQF code, does the site have to use an ISO method despite the first paragraph stating national methods are acceptable?**

The first paragraph of 2.4.4.2 is applicable to product analysis only and method does not need to be "ISO method" but does need to be compared to and determined to be equivalent to a national standard. The national standard would be dependent on what product and specific test is being applied. The second paragraph is applicable to all types of food safety testing, not just product specific, that are critical to product safety.

**18. We perform some of our product release (quality) testing at the parent company, which is not SQF-certified. What special requirements should I have in place?**

Quality testing is not applicable to these code requirements for ISO 17025 practices and lab proficiency testing, but to ensure accurate quality testing results you may want to consider evaluating the lab practices at your quality lab.

**19. If a lab does microbiological sampling, but doesn't perform the testing, does the proficiency testing requirement apply?**

If your internal lab is performing the testing and it is microbiological testing, then this applies for the proficiency testing and following ISO 17025 lab requirements.

## Other Questions

**1. Can the HACCP Plan and Preventative Control plans be combined so that only one plan needs to be maintained?**

Yes, the two food safety plans can be combined to address both the HACCP and regulatory requirements.

**2. Many sections were renumbered; do we just add the new requirements to our current procedures although our numbering is different?**

The responsibility of the SQF certified site is to demonstrate that the site's food safety plan follows the SQF Code, Edition 9. It is not a requirement that the site's policies match the Code requirements. If the site can demonstrate compliance, then different numbering should not be marked as a non-conformance.



3. **Can you please provide the SQF definition of "hazardous chemical" per 11.6.4 in the SQF code and if there is a defined quantity that does or does not require a spillage kit?**

The SQF Code does not define "Hazardous Chemicals" or however, I would defer to the definition outlined by OSHA: A hazardous chemical, as defined by the Hazard Communication Standard (HCS), is any chemical which can cause a physical or a health hazard. ... In the absence of such a statement, employers should contact the manufacturer when they question the hazard status of a chemical.

The intent of the spillage kit is to maintain food safety within the site and prevent any cross contamination. The site should conduct a risk assessment to determine the extent of the spillage kit used at the site.

4. **In 11.5.5.1 of the SQF code, do we need to conduct testing to prove that air quality will not contaminate food or surfaces?**

Yes, but the monitoring and testing of air is required in clause 11.5.5.2 of the code.

5. **In 2.6.3.2 of the SQF code, a new requirement for recall testing is to carry out on products from different shifts and across a range of products. This creates a situation where we will need to search for an item/product that will meet these criteria which eliminates the randomness of recall testing. We would often have our customer select a job order to perform a mock recall. Any concerns about "cherry-picking" products reducing the effectiveness of a mock recall test?**

The intent of expanding the recall requirement was to encourage the site to challenge the recall program and test different products and shifts. How that is accomplished is determined by the site.

6. **We are a greenhouse, and we pack and ship our product through a marketer to Canada and US. Sometimes, we receive a third-party product, (pre-packed) and we just ship it through our marketer to retailers in Canada or US. Do we need a SQF Storage and Distribution certificate as well? Or is having an SQF primary plant production certificate enough?**

It depends on the site's scope of certification and your buyer's requirements. If storage and distribution is a part of the site's 'normal' operational flow, then it would not need to be considered. This may be included in the co-manufacturer requirement if this is a third-party contracted storage and distribution site. Your CB should be your source to determine if this would be included in your scope of certification or should be handled by a separate certification.



- 7. This is a question related to 2.3.2: Specs. 2.3.2.2 states "Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current". 2.3.2.10 states "2.3.2.10 Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. ". 2.3.2.10 reads that we should have specs for all chemicals while 2.3.2.2 reads that we should have specs for chemicals that are considered raw materials. What are we expected to have? For example, are we expected to have specs for chemicals used in restrooms? I know most companies currently have SDS's for chemicals used in their facilities. Specs usually aren't required.**

The key phrase in 2.3.2.2 is "that impact finished product safety." Your best bet is to determine the risk to the chemicals used in the restroom to determine the impact to finished product safety.

- 8. Can shelf life be set by the company and be a freshness date? For instance, wine can have a shelf life of 10 years. Do you need to keep your records for 10 years?**

The new requirement for 2.2.3.3 and 2.4.4.5 requires records and retention samples to be kept within their designated shelf-life as it relates to food safety. If there is no established shelf-life for food safety then the site shall meet the requirements set by the regulatory body, customer, or internal policy.

- 9. Can you include something on the new threat assessment requirement for food defense in the FAQ document?**

A food defense threat assessment is an exercise where the facility would brainstorm or research about the potential threats that may be likely to occur at their facility, similar to a HACCP hazard risk assessment, including what is the likelihood, how severe are the consequences, and what would be the strategies for the control of this threat. A prevention strategy for the significant risks that the site identified should be developed and documented. FDA, USDA and other regulatory and private industry groups have several tools accessible for assessing threats at a food facility, including the TACCP, CARVER + Shock assessment software, FDA Food Defense Plan Builder, and the Food Defense Mitigation Strategies Database available for free public use through the FDA.gov website. The Food Defense Mitigation Strategies Database contains an extensive listing of mitigation measures that may be useful to segments of the food industry in reducing their food defense vulnerabilities.

Here are just a few resource links:

- [USDA Food Defense and Emergency Response](#)
- [FDA Food Defense Plan Builder](#)

**10. Can substitute SQF practitioners receive HACCP training online due to COVID19?**

Yes. There are many eligible HACCP training programs that meet the definition of HACCP training. SQF revised the definition of HACCP training to remove the minimum day requirements to accommodate online and virtual HACCP training. Please refer to the HACCP definition in the SQF Code (Appendix 2- Glossary).

**11. In 2.3.3.3 of the SQF code, contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevant personnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times. Is the "site" the 3rd Party facility, and does "verify compliance" mean they have to be SQF Certified?**

The SQF Code does not require the contract manufacturer to be certified to SQF. The site would need to demonstrate compliance as to how the site meets the requirements of the SQF Code. This could be accomplished through an on-site audit by the site or other third-party agency.

**12. We have three facilities within 20 miles, each has a designated SQF practitioner, but travel between facilities. What will the requirement be for a substitute practitioner?**

The intent of the substitute practitioner is to ensure that there is availability of a practitioner when the designated practitioner is not available due to illness, vacation, etc. The site would need to determine if the practitioners at the other sites can accommodate the responsibilities of the substitute practitioner based on their current roles, responsibilities, and availability to the site.

**13. For 2.3.3.3, "Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code" - just to make sure I understand this correctly, this should not pertain to customers that are distributors, correct? Because then that would be a second party storage & distribution business.**

Correct. This requirement applies to sites that maintain a contract with a storage and distribution site to hold and distribute the SQF certified product.

**14. Was the requirement "employed on a full-time basis" for the SQF practitioner and substitute removed?**

The requirement was reworded to read, "Be employed by the site." The intent is that the site is committed to food safety personnel and is not a consultant. The SQF Practitioner does not need to be full time or may have other roles and responsibilities, depending on the site.