SQF Revision 8.1:

Management Overview for Retailers

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FOREWORD

Over the past 30 years, I have had the opportunity to work with various international management systems, to include quality, environmental, lab, and of course, food safety systems. The common comment that I frequently hear is that the task to implement one of these systems is an arduous one. Interpreting the standard and knowing what the auditor will be looking for leaves pause to many that are responsible for certification for their company.

When the International Quality Management System standard debuted in 1987 (better known as ISO 9001), the training company I managed, developed accredited courses and we went on to conduct training primarily via public seminars. Our accredited Lead Auditor Course had a high pass rate and we were one of the top training firms in the world. For many years we had trained more people than any other firm.

Although our training was deemed exceptional, once those trained individuals returned to their respective facilities, they struggled to implement the ISO 9000 system within their facility. They had been given the tools, so we thought, to prepare their organization for certification.

We found that even though companies had sent out individuals to be trained on the standard, these individuals struggled to implement the requirements. Over time our firm developed a streamlined approach that took companies from an initial gap assessment to the internal audit thus preparing the company for certification by an accredited certification body.

The companies we worked with were achieving certification in less than half of the time of those companies that did not seek assistance. Over the past 30 years and to date, this approach has and continues to be most successful with thousands of companies achieving certification.

This streamlined approach had been adopted at Perry Johnson Food Safety Consulting, Inc. where we assist those organizations in the food supply chain to attain SQF certification in a timely and cost-efficient manner.

Whether your company has a robust food safety system or are starting from scratch and are seeking SQF certification, contact us.

This overview booklet is designed to provide you with a better understanding of the SQF requirements.

Carrie Hayden
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THE USERS OF THIS GUIDE

This guide will be useful to managers and other personnel in organizations that meet any of the following criteria:

- Companies seeking to remain abreast of worldwide SQFI requirements

- Firms planning to improve their quality assurance and food safety management programs

- Companies seeking a competitive advantage in the marketplace

- Companies desiring to make customer satisfaction a top priority

THE BENEFITS OF SQF

Becoming SQF certified lets customers and consumers know that your company has been verified as having a complete and effective food safety program. The following are just some of the benefits your company will realize:

- Provides proof of due diligence with respect to food safety

- Assurance that your company complies with regulatory requirements

- Increased consumer confidence and loyalty

- Increases marketability

- Improves the food safety culture

- Recognized around the world

- Food safety conscious work force reduces cost due to failures

WHAT IS SQF?

SQF is a Food Safety Management Certification Scheme, owned by SQFI (Safe Quality Food Institute). It originated in Australia and has been owned and operated by the Food Marketing Institute (FMI) since 2003.

The SQF program is a stringent food safety and quality certification program that helps food producers and retailers assure their buyers that their products have been handled according to the highest quality global food safety standards.

It is a worldwide organization, and one of many schemes recognized by GFSI (Global Food Safety Initiative) as an acceptable and credible food safety and quality program. *It is the only GFSI recognized standard that is considered "farm to fork", meaning that the code covers everything from Good Agricultural Practices, to processing, and retail.* This guide will focus on the manufacturing elements of the code.

The SQF food safety standard has a unique structure which includes a modular approach. **Module 2 of the standard is applied to all food retailers** and applies to basic management requirements and application of the HACCP based process. The other modules of the standard are applied to the industry specific Good Retail Practices (GRPs).

To allow flexibility, the SQF standard has different programs available to implement:

- SQF Fundamentals Program - Not GFSI Benchmarked - Not used for retailers

- SQF Food Safety Program - The food safety system is certified

- SQF Food Safety and Quality Program - The food safety and quality attributes system are certified-Not used for retailers

THE ROLE OF GFSI (GLOBAL FOOD SAFETY INITIATIVE) IN SQF

The **Global Food Safety Initiative**, which began in 2000, was created to ensure confidence in the delivery of safe food to consumers worldwide. At that time, food safety was a big concern due to several high-profile recalls, quarantines and negative publicity about the food industry.

GFSI provides a platform for leading food safety experts from all over the world to collaborate and undertake current food safety issues. These experts work on a volunteer basis in order to reduce food safety risks, promote continuous improvement, and build trust throughout the food supply chain.

The GFSI objectives are to:

- Reduce food safety risks by delivering equivalence and convergence between effective food safety management systems
- Manage cost in the global food system by eliminating redundancy and improving operational efficiency
- Develop competencies and capacity building in food safety to create consistent and effective global food systems
- Provide a unique international stakeholder platform for collaboration, knowledge exchange and networking

GFSI helps define the requirements for food safety through a benchmarking process. Within GFSI benchmarking is a "procedure by which a food safety-related scheme is compared to the GFSI Guidance Document". There are a number of food safety management schemes that fulfill the criteria of the GFSI guidance document and many of the world's largest food retailers are requiring supplier certification to the GFSI schemes.

CERTIFYING TO SQF VERSION 8.1

SQF certification is a tangible expression of a firm's commitment to food safety that is internationally understood and accepted.

SQF certified organizations almost universally realize major increases in customer acceptance, as well as a reduction in cost. Many firms, already subject to food safety system standards imposed by major customers, find that the biggest effect of SQF certification is on their non-manufacturing functions and improvements in their food safety programs.

SQF certification is carried out by certification bodies (commonly called registrars), which are accredited organizations that review the facility's food safety manual and other documentation to ensure that they meet the standard. They also audit the firm's processes to ensure that the food safety management system described in the documentation is in place and is effective.

Once certification is obtained, the certification body conducts yearly recertification audits of the facility to determine if its food safety system continues to meet the code's requirements; SQF is a code that requires periodic unannounced audits.

For a typical company attempting to implement and document these requirements on their own, it can take 2 or more years to prepare for certification. Much of the time being spent on what needs to be documented and the documentation and implementation process.

Perry Johnson Food Safety Consulting, Inc. offers a streamlined implementation approach that includes not only assistance on implementing the requirements, but also the development of HACCP based food safety plans and the SQF Food Safety Manual. Our implementation experts, many of whom have also conducted SQF certification audits, understand the requirements and how to best meet these requirements. This can save an organization time/money in maintaining their food safety system.

PJFSC – IMPLEMENTATION PROGRAM STEPS (MAY INCLUDE)

Step 1 Gap Assessment . Perry Johnson consultants will assess the current state of compliance of your facility. This assessment will include a review of your facility's current practices including assessment of documentation required by the SQF code and executional practices, such as cleaning methods. Additionally, the consultant will evaluate the HACCP plan, if in place. At the conclusion of the initial consult, a written report will be provided. This report will identify the areas where the organization meets the requirements and where the organization does not meet the requirements to attain certification.

Step 2 Documentation Development . Development of the Food Safety Manual, food safety procedures including procedures addressing prerequisite programs, and the HACCP plan, including identifying records to be retained as proof of ongoing food safety compliance. The documentation preparation will be conducted off site. Perry Johnson will help ensure that the system established is robust, effective, transparent and consistent.

Step 3 Consult . Assist in implementing the developed program, including training management and staff on executing documented processes. Perry Johnson will also assist in training members of the Food Safety Team on maintenance of the Food Safety System.

Step 4 Internal Audit . Once the Food Safety system has been established, documented and implemented, Perry Johnson will perform a full system internal audit.

Step 5 Close-out Nonconformances . Thus preparing the organization for the certification audit by an accredited certification body.

The SQF Certification Process is as Follows:

Certification Audit . The full system facility audit will go into detail of the SQF System and Good Manufacturing Practices' executional elements, as well as the Quality System for companies requiring SQF Food Safety and Quality. The duration of the facility audit is based on a number of factors: size of the facility, employee count, number of HACCP plans and any customer specific addendums. All findings from the certification audit must be closed-out prior to the certification body issuing a certificate.

PRE-REQUISITE PROGRAMS – WHAT ARE THEY?

Pre-requisite programs (Good Retail Practices) are procedures and controls that are put into place to manage the environment to ensure safe food products. These programs, to include Good Retail Practices, are the foundation of a food safety system.

Pre-requisite programs may vary and are contingent upon the type of food being sold. Some of the more common examples of a pre-requisite program are as follows:

Personnel Practices

This program includes documented practices for staff, including requirements for hand washing, the use of hair restraints, cleanliness of clothing, handling of staff with illness, and include documented information relating to:

- When employees must wash hands;

- What sort of hair restraints are to be worn;

- Cleanliness requirements for clothing, or uniforms;

- Addressing staff items such as jewelry allowed to be worn, fingernail paint and extensions;

- Employee conduct such as smoking, eating and drinking in processing areas;

- Staff hygiene training on identifying sanitation failures;

- Reporting and handling of employee illness.

Facility and Grounds

Facility and grounds are practices that include management of the company's site(s) and building(s) to prevent food safety risks, these practices specifically address:

- Maintaining of the company's grounds in a manner that prevents potential food risks, such as standing water, dust and preventing build ups which may attract pests, this also includes managing and treating waste;

- Managing outside storage of ingredients and products in bulk containers;

- Managing the storage of equipment to prevent attracting pests;

- Providing adequate lighting and ventilation within the facility to allow adequate cleaning and prevent build up of vapors or odors.

Housekeeping and Cleaning

This program includes maintaining of the company's facility and equipment in a condition that prevents product from becoming adulterated, this is often accomplished by developing and documenting SSOPs (Sanitation Standard Operating Procedures), these procedures will define what is to be cleaned, how to clean the item including what utensils and equipment to clean the item with, when to clean and who is responsible for cleaning the item.

- Cleaning and sanitizing equipment including food contact surfaces and utensils within the facility;

- Control of chemicals - this control is often accomplished by properly identifying chemicals, and having an approval method of what chemicals are allowed as well as maintaining a documented list and inventory of the approved chemicals, these chemicals include cleaning and sanitizing chemicals, maintenance chemicals and pesticides;

- Elimination of pests via cleaning and pest control.

Equipment and Utensils

This program includes designing and maintaining the company's equipment and utensils to prevent the potential for contamination of product.

- Managing equipment and utensil design in a manner that allows adequate cleaning and prevents contamination, this typically means that the equipment used in areas where the interaction with water is common is made from stainless steel, food contact surfaces are made from non-porous materials such as plastics;

- Seams in equipment and utensils are closed to prevent build ups of product;

- Freezers and cold storage units that are used to hold product that has a reasonable potential of growth of microorganisms be fitted with a thermometer or temperature recorder, and that the temperatures be monitored;

- Equipment that is used to record key processing parameters such as pH, water activity, etc. be accurate and properly maintained;

- Compressed or other gases (such as nitrogen used as a preservative) used directly on food, on food packaging, or used to clean food contact surfaces must not be contaminated.

FOOD SAFETY PLAN

The food safety plan is to be HACCP based, using the methodology for identifying and controlling the key risks of a food manufacturing process in order to reduce or eliminate the risk completely.

There are 7 common steps on developing a food safety plan.

1. **Conduct a Hazard Analysis**

   Determine the food safety hazards and identify the preventive measures that can be applied to control the hazards. A food safety hazard is any biological, chemical, or physical property that may cause a food to be unsafe for consumption. An example of a biological hazard would be Salmonella; chemical hazards could be undeclared food allergens such as peanuts; and a physical hazard could be glass.

   The best method to identify the potential hazards is to list the ingredients and document the process flow. Once this is completed, each ingredient is analyzed for potential hazards in the process flow.

2. **Identify Critical Control Points**

   A Critical Control Point (CCP) is a point, step, or procedure in a food manufacturing process where an action can be taken to either eliminate or reduce to an acceptable level an identified food safety risk.

   An example of this type of control includes cooking to a temperature for a sufficient amount of time to kill target pathogens (harmful bacteria, such as Salmonella).

3. **Establish Limits for Each Critical Control Point**

   A critical limit is the maximum or minimum value to which a physical, biological, or chemical hazard must be controlled to prevent, reduce, or eliminate the hazard.

   An example of a critical limit is cooking meat to a minimum core temperature of 165 degrees and holding that core temperature for at least 30 seconds. This is the temperature recommended to kill pathogenic bacteria in most meats.

4. **Establish Monitoring Requirements for the Critical Control Points**

   Monitoring activities are necessary to ensure that the process is under control at each critical control point.

   An example of this monitoring is to verify and record the core temperature and holding time for each piece of meat to be sold.

5. **Establish Corrective Actions**

   These are actions to be taken when monitoring indicates a deviation from the established critical limit. The Food Safety Plan identifies the corrective action to be taken when this occurs. Corrective actions are intended to ensure that no product that has not been processed to the critical limits reaches the marketplace. Corrective actions are typically pre-determined, and the actions taken must be documented.

   An example of a corrective action might be to reprocess each piece of meat in a batch that has not met the minimum temperature and hold time.

6. **Establish Procedures to ensure the Food Safety Plan is Working as Intended.**

   Validation ensures that Critical Limits established do what they were designed to do.

   An example is to verify that the established critical limits of cooking temperatures and hold times actually kills the target pathogens.

   Verification ensures the HACCP plan is being executed as defined.

   An example of verification is to review Critical Control Point records to ensure that the product is reaching the intended control temperatures and times, that the sampling frequency is being performed as defined, and that corrective actions identified are being carried out as required.

7. Establish Record Keeping Procedures

Records must be maintained, including the Food Safety Plan, the hazard analysis, critical control points monitoring, validation results, verification activities, and the handling of deviations, as well as any corrective action taken.

SQF CODE

The SQF code is defined into 2 auditable modules. Module 2 - the SQF System Fundamentals Module contains the common elements that apply to all facilities. The other module addresses the requirements for Good Retail Practices.

Elements in module 2 identified as "mandatory" cannot be excluded from the food safety management system. Elements that are not mandatory may be excluded, provided adequate justification (such as risk analysis) can be provided.

SQF SYSTEM FUNDAMENTAL MODULE 2

2.1 Management Commitment

2.1.1 Food Safety Management - General Requirements (Mandatory) - This element requires that the company show commitment to document, implement and maintain an effective SQF system, including defining the sequence and interaction of process, and monitor and measure the effectiveness of the processes.

2.1.2 Food Safety Policy (Mandatory) - This element requires that Senior Site Management documents a food safety policy that defines the site's commitment to supplying safe food, meets regulatory requirements and continually improves the food safety system. The documented policy is to be signed by senior management and be available in all languages spoken at the site.

2.1.3 Food Safety Management System (Mandatory) - This element requires that the company develop a food safety manual that outlines the methods to meet the requirements of the SQF Code, including a list of the processes used at the store and departments covered in the certification, as well as the prerequisite programs used.

2.1.4 Management Responsibility (Mandatory) - This element requires that the reporting structure be defined and communicated to staff. This is frequently satisfied via an organizational chart that is posted. Additionally, job descriptions are a requirement.

2.1.5 Management Review - Management review is a meeting that is required to be held on a minimum yearly basis, be attended by Site Senior Management, and records of these meetings are to be retained.

The process for management review must be documented. There are several required topics of discussion, including review of the Food Safety Manual, customer complaints, corrective action, internal and external audit findings. The meeting also requires a review of the results of previous management reviews.

2.1.6 Resource Management - The senior management team should ensure they have provided adequate resources to develop, implement, establish, maintain and ensure ongoing improvement for the SQF Food Safety System and to meet the current Food Safety Objectives. A qualified person is to be named the SQF Practitioner.

2.1.7 Complaint Management - Customer complaint handling requires a documented procedure. Customer complaints are to be analyzed and records of the causes and corrective actions, when applicable, are to be retained. Customer complaints are to be trended and reviewed as part of the management review process.

2.2 Document Control and Records

2.2.1 Document Control (Mandatory) - Requires a procedure that addresses the methods to create and revise Food Safety Management System documentation.

2.2.2 Records (Mandatory) - Requires a procedure that addresses the methods for retaining records of the operation of the Food Safety Management System, a list of records to be retained, and the time length for retention to meet customer and regulatory requirements.

2.3 Specification and Products

2.3.1 Contract Service Providers - Specifications for contract services that have an impact on food safety are required to be documented, current, include a full description of the service provided. Contract service providers include maintenance and pest control providers.

2.3.2 Third Party Operators - Specifications for third party operators that have an impact on food safety shall be documented, current, include a full description of the product or service to be provided. Third party operators include bakery and pastry.

2.3.3 Purchasing - A buying standard must be documented for all externally provided product that meet requirements including raw materials, packaging and prepackaged food.

2.3.4 Supplier Approval and Performance (Mandatory) - A documented risk-based program must be developed that defines how to select, evaluate and reevaluate suppliers of ingredients, prepackaged food, food additives and packaging. A register of the approved suppliers is to be maintained.

2.4 Hazard and Risk Management System (Mandatory)

2.4.1 Food Safety Plan - A documented food safety plan must be in place. The plan must be based on HACCP guidelines established in the Codex Alimentarius. Food hazards including chemical hazards such as food allergens, physical hazards such as glass, and biological hazards such as Salmonella are to be identified in each step of the process where they may occur.

Measures are to be put in place which will control or eliminate these identified hazards, such as x-ray inspection to control broken glass.

2.4.2 Control of Nonconformity - A documented process must be established which addresses the methods for ensuring that nonconforming, or suspect product, packaging or ingredients does not enter commerce. The process must also ensure that damaged or unsanitary equipment does not get used in processing.

2.4.3 Hazard and Risk Management System

2.4.3.1 and 2.4.3.2 Hazard and Risk Management System - Risk assessments to be performed for activities including services that entail preparation of food items such as bakeries, delis, produce and meat departments. Each of these types of activities including operations using pre-requisite programs (such as sanitation, pest control, equipment maintenance, etc. Verification must be performed for these activities.

2.4.3.3 Validation and Effectiveness (Mandatory) - Validation consists of proving that the selected method or process effectively controls the targeted characteristic, such as proving that cooking at 300 degrees for 2 minutes kills the bacteria in your product. The methods for validating the Good Manufacturing Practices are achieving their identified results and that critical control points are effectively controlling the targeted food safety risk within the site must be documented. Validations must be performed when processes are changed, or otherwise yearly, at a minimum. Validation records must be maintained.

2.4.3.4 Verification Schedule - A verification schedule outlining verification activities, frequency of verification and the responsible individuals shall be prepared and implemented.

2.4.3.5 Verification of Monitoring Activities - The process, responsibility and criteria for verifying the effectiveness of monitoring pre-requisite programs, critical control points and other food safety controls identified must be documented and implemented.

2.4.3.6 Method of Monitoring and Verifying Temperature of Cold Handling Food for Safety Activities - A method must be in place to monitor and verify cold holding temperatures of foods. Records of these activities are to be retained.

2.4.3.7 Method of Monitoring and Verifying Temperature of Cooking Food for Safety Activities - A method must be in place to monitor and verify cooking temperatures to ensure food safety. Records of these activities are to be retained.

2.4.3.8 Method of Monitoring and Verifying Temperature of Hot Holding Food for Safety Activities - A method must be in place to monitor and verify hot holding temperatures to ensure food safety. Records of these activities are to be retained.

2.4.3.9 Method of Monitoring and Verifying Temperature of Cooling Food for Safety Activities - A method must be in place to monitor and verify hot cooling temperatures of foods to ensure food safety. Records of these activities are to be retained.

2.4.3.10 Method of Monitoring and Verifying pH of Food for Safety Activities - A method must be in place to monitor and verify pH of foods to ensure food safety. Records of these activities are to be retained.

2.4.3.11 Method of Monitoring and Verifying Salinity of Food for Safety Activities - A method must be in place to monitor and verify salinity of foods to ensure food safety. Records of these activities are to be retained.

2.4.3.12 Method of Monitoring and Verifying On-site grinding of Raw meats, Poultry and/or Seafood for Safety Activities - A method must be in place to monitor and verify on-site grinding of raw meat, poultry or sea foods to ensure food safety. Records of these activities are to be retained.

2.5 SQF System Verification

2.5.1 Internal Audits and Inspections (Mandatory) - The process for performing internal audits must be documented and in place. Internal audits covering all of the store, including in store vendors are required to be conducted yearly, by competent, independent personnel. The system employed must verify that the entire food safety system, including all applicable elements of the SQF code are audited. Additionally, internal auditing practices must ensure that equipment and Good Retail Practices are periodically audited. Correction and corrective actions resulting from auditing activities must be documented. Records of internal audits must be maintained.

2.5.2 Corrective Action (Mandatory) - Corrective Action is a process that corrects an existing problem, such as an identified food safety issue. The corrective action processes must be documented, including the steps for identifying the root cause, the corrective/preventive action taken and the methods for ensuring that the action put into place are effective. Records resulting from these actions must be maintained.

2.5.3 Control of Monitoring and Measuring Devices (Mandatory) - Calibration methods must be documented and in place. In cases where equipment is found to be outside of the allowable limits, the effect on product and processes must be assessed and documented. Calibrations must be to national or international standards. Records of calibrations must be maintained.

2.6 Product Identification, Trace, Serious Incident Management

2.6.1.1 Product Identification - The methods for identifying ingredients, packaging, work in process, finished items, including those awaiting sale, must be clearly identified. Finished products must be labeled to meet regulatory requirements.

2.6.2 Product Trace (Mandatory) - Finished in store product traceability must be in place and documented. Traceability requirements extend to ingredients, direct food contact packaging (referred to as one down), and shipments to the customer or intermediate locations (referred to as one up). Traceability records, including product rework must be maintained.

2.6.3 Serious Incident Management

2.6.3.1 Crisis Communication Plan - A crisis communication plan is to be documented which addresses potential types of crises, such as tornados, hurricanes or other disasters. The documented plan addresses the responsibilities of the crisis management team, the crisis management training needs, and handling of potentially affected products. It also addresses communication activities to both internal and external parties.

2.6.3.2 Product Withdrawal and Recall (Mandatory) - The process for conducting product recall, including the recall team members, and communications channels, including regulatory, SQFI, and Certification Bodies must be documented. Mock recall exercises must be conducted yearly, at a minimum. Records of mock recall and any actual recall records must be maintained.

2.7 Food Defense (Mandatory)

2.7.1 Food Defense Plan (Mandatory) - A food defense plan must be documented and in place. The plan must address the responsible senior site managements roles, site authorization access, and protecting ingredients and finished products from acts of deliberate adulteration. The documented plan must be reviewed and tested yearly via challenges. Records of reviews and challenges must be maintained.

2.8 Training

2.8.1 Training Requirements - This process is for defining and implementing a method for ensuring competency of the employees who affect the company's SQF compliance and product food safety. Regulatory compliance must be documented.

2.8.2 Training Program (Mandatory) - The staff training program must be documented and in place. The program being used applies to all staff members who are responsible for developing and applying the SQF system and Good Retail Practices, managing food regulatory requirements, and managing the HACCP or Food Safety Plan.

2.8.3 Training Requirements - Documented training is required for all staff engaged in developing and maintaining food safety plans and procedures.

2.8.4 Language - Training and instructional materials must be in the language understood by staff to be trained.

2.8.5 Refresher Training - The established training program is required to include identification and implementing refresher training needs.

2.8.6 Training Skills Register - A register of training must be documented and maintained. The register must include: staff trainee name, skills trained, trainer name, and supervisor verification of the effectiveness of the training.

GOOD RETAIL PRACTICES MODULE 15

Requirement

15.1 Site Requirements and Requirements

15.1.1 Premises Location and Approval - Stores must be located in a manner that surrounding buildings and operations do no impact food safety. Site operations must be approved by relevant regulatory bodies.

15.1.2 Local Environment - The grounds and area surrounding the stores must be maintained to eliminate waste and prevent pest attractants.

15.1.3 Facility Design, Construction, Layout and Product Flow - 15.1.3.1 - The design, construction, layout, product flow and ongoing operation of the premises of organization's store(s) must be maintained externally and internally minimize risk of product contamination and meet regulatory requirements.

15.2 Construction, Control of Product Handling and Storage Areas

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

15.2.1.1 Materials and Surfaces - Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging material storage, cold and hot holding storage and sales areas must be constructed of materials that will not contribute a food safety risk, such as stainless steel.

15.2.1.2 Floors, Drains and Waste Traps - Floors must be smooth and made from materials that are not affected by chemicals and are easily cleaned. Floors should slope toward drains. Drains must be easily cleaned. Waste traps cannot be located in food handling areas and entrances.

15.2.1.3 Walls, Partitions, Ceilings and Doors - Walls, ceilings and doors must be made from materials that do not degrade and are light colored. Wall to wall and wall to floor joints must be designed to be easily cleaned to prevent harborage. Overhead items including ducts and pipes must be made in a manner that do not pose a food safety risk.

15.2.1.4 Lightings and Light Fittings - Light intensity in food handling areas must have an intensity that does not prohibit the tasks being performed in the area. Bulbs in these areas must be shatterproof or covered with shatterproof materials.

15.2.1.5 Dust, Insect, and Pest Proofing - External openings must be sealed to prevent pest entrance. Staff and visitor doors must be self-closing and insect proofed. Overhead doors in processing areas must have screens, seals or other means to prevent insects. Pest control lights cannot pose a food safety risk. Rodenticides cannot be used in processing areas.

15.2.1.6 Ventilation - Adequate ventilation is required in processing areas. When used, ventilation devises and hoods must be maintained to prevent condensation or other food safety risks.

15.2.2 Equipment

15.2.2.1 Equipment - Equipment and utensils must be designed and installed in a way that prevents food safety risks. Containers, bins and tubs must be smooth and maintained in clean condition. Wash down hoses must be stored off of the floor. Display equipment must protect product for sale.

15.2.3 Maintenance

15.2.3.1-15.2.3.5 Maintenance - The maintenance process must be documented. Ongoing maintenance must be scheduled and documented. The schedule must include infrastructure such as the building, equipment and premises. Equipment breakdowns and maintenance records must be maintained. After completion of repairs, maintenance staff and contractors must be trained in food safety. When repairs are completed tools are to be removed. The maintenance and facility supervisors are to be notified when repairs are completed so that cleaning and inspection of the repair can take place. Food grade lubricants and paints are to be used in food processing areas.

15.2.4 Pest Control

15.2.4.1 Pest Control - The methods and responsibility of pest management must be documented and in place. Harborage spots in machines, processing or storage must be prevented. In cases where ingredients or product is found to be contaminated by pests, the affected items must be disposed of and a record of the disposal must be maintained. Records of pest sightings, approved chemicals to treat pests and SDS, chemical treatments to prevent pests

must be maintained. Additionally, employee awareness training for pest control and application of treatments, (if applicable) trends or other measurements of effectiveness of the plan must be maintained. Inspections for pests must take place on a regular basis, records of these inspections must be maintained. If using pest contractors, the contractors must be approved, licensed, use only approved chemicals and report to an authorized individual when entering or leaving the site. Records of the results of inspections must be maintained. Pesticides must he handled according to directions, clearly labeled, stored under controlled conditions and disposed of in accordance with regulations.

15.2.5 Housekeeping and Sanitation - The methods for cleaning infrastructure and the manufacturing environment, including equipment, processing areas and restrooms must be documented. Cleaning documentation must define what, how, when and who is to clean identified items, records of cleaning, as well as the effectiveness verification must be maintained. Employee areas such as restrooms and other common use areas, must be inspected by designated staff at defined frequencies.

Cleaning and sanitizing agents used must be intended for food use and must meet applicable regulatory requirements and be used in the manufacturer's recommended concentrations. Records of approved chemicals, periodic inventories taken, training of applicable staff in chemical usage, pre-operational inspections after cleaning and SDS for these chemicals must be maintained.

15.3 Personnel Hygiene, Welfare & Personnel Processing Practices

15.3.1 Staff and Public Facilities

15.3.1.1 Toilet Rooms - Restrooms of sufficient quantity for staff size and public size and must be access through airlock vents. Hand washing sinks must be provided inside or immediately outside restrooms, and uniform storage racks/hooks must be provided adjacent to restrooms. Restrooms must be easily cleanable and maintained in clean condition.

15.3.1.2 Staff Amenities - Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and processing of product. Provision shall be made for staff to store their street clothing and personal items separate from food contact zones, food and packaging storage, and sales areas.

15.3.1.3 Break/Lunchrooms - Store must provide lunchrooms that are well lit and ventilated, away from processing areas. Hand wash signs must be posted in languages understood by employees.

15.3.1.4 Bodily Fluid Clean Up Procedures - Bodily fluid clean up procedures, trained employees and adequate materials must be provided to safely clean up bodily fluid spillage events.

15.3.2 Personal Hygiene, Protective Clothing and Health Standard

15.3.2.1 Personnel - Personnel suffering from infectious disease, or personnel with open wounds are not permitted to handle food or work in process. Methods must be employed to prevent body fluids from contaminating products. Eating, drinking smoking or spitting is not allowed in food processing and handling areas, except drinking of water from site approved containers.

15.3.2.2 Handwashing - Hand wash sinks must be conveniently located. Hand washing is to take place after restroom use, smoking, eating, drinking, using tissues, handling wash hoses, hand to floor contact or handling contaminated items. The hand washing sinks must be in good repair, have warm water, soap, paper towels and trash receptacles. Hands free spigots and hand sanitizer must be provided in high risk processing areas. A hand washing sign must be posted in areas near sinks and in restrooms. The signs must be in languages understood at the site.

15.3.2.3 Clothing - Clothing worn by staff engaged in handling food shall be cleaned, stored, laundered and worn in a manner that does not present a contamination risk to food items. Staff engaged in high risk areas, such as meat cutting, must wear clean protective outerwear when entering high risk areas. Clothing including shoes shall be clean and maintained. Disposable gloves and aprons when used, must be changed as needed to prevent cross contamination. Non-disposable aprons and gloves must be maintained in clean condition.

15.3.2.4 Jewelry - Jewelry and other loose objects worn on hands and arms are not to be worn in food handling and processing areas, plain bands with no stones and medic alert bracelets may be worn, if permitted by the store.

15.3.2.5 Visitors - All visitors, including management and maintenance staff, must wear suitable clothing and footwear when entering any food processing or handling area, visitors with obvious signs of illness are not permitted to enter food handling areas.

15.3.2.6 Personnel Processing Practices - Staff is required to handle materials and products in a manner that prevent potential contamination and damage. Containers of products and materials must be kept off of the floor. Waste must be stored in identified receptacles and must be removed to prevent build up. Staff is required to wear hairnets and are not permitted to eat or taste products.

In cases where sensory evaluation of product is required in processing areas, only approved staff that practice good hygiene are permitted to do so. Wash down hoses are not permitted to be stored on the floor and must be stored on designated hose racks.

15.4 Storage, Transport & Separation of Functions

15.4.1 Physical, Chemical and Biological Product Contamination Risk

15.4.1.1 Cold Storage, Freezing, Chilling and Hot Holding of Foods - The store must provide confirmation of the effective operational performance of freezing, chilling, cold and hot holding storage equipment. Discharge from condensation lines must be controlled and discharged to the drainage system. Loading, transporting and unloading dock areas must be designed to protect the product during loading transporting and unloading.

15.4.1.2 Storage of Dry Ingredients, Packaging and Shelf Stable Packaged Goods - Storage areas for ingredients and packaging must be stored away from wet areas. Racks must be constructed of non-porous materials and allow for cleaning. Vehicles used in product and ingredient handling must not pose a food safety risk.

15.4.1.3 Storage of Equipment and Containers - Storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.

15.4.1.4 Storage of Hazardous Chemicals and Toxic Substances - Hazardous chemicals that could potentially pose a food safety risk must be stored to prevent a risk to staff, equipment, utensils, and product. Chemicals must be maintained in original containers or must be clearly labeled when stored in other containers.

Chemicals used for cleaning and sanitizing must be stored away from pesticides and rodenticides. Chemicals must comply with local and national regulations. Hazardous chemicals must have appropriate signs identifying them. Employees using chemicals must have training and instructions readily available. Records of training must be documented.

15.4.1.5 Alternative Storage and Handling of Goods - Where goods held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis must be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food safety and quality.

15.4.1.6 On-Site Laboratories - On-site laboratories must be located separate from processing when chemical and microbiological testing is performed and can only be accessed by authorized personnel. Signage is required to identify laboratories as restricted access.

15.4.2 Segregation and Cross-Contamination

15.4.2.1 Process Flow - Process flows must be controlled to prevent cross contamination.

15.4.2.2 Receiving Products - Dry ingredients and pre-packaged foods, and packaging must be received and stored separately from frozen and chilled raw materials and pre-packaged foods to prevent cross contamination. Unprocessed raw materials must be segregated to ensure there is no cross contamination.

15.4.2.3 Thawing of Food - Thawing of product must take place with equipment and rooms that are adequate. Water thawing is to take place in continuous flow that prevents product deterioration or contamination. Air thawing must take place under controlled temperature and rates that prevent product deterioration or contamination.

15.4.2.4 High Risk Processing - When processing or handling high risk products, after kill steps or process interventions, products must be segregated and handled in a manner that protects the product from cross contamination from employees, ingredients or unprocessed items.

15.4.2.5 Control of Foreign Matter Contamination - The process for preventing foreign material contamination must be documented, in place and communicated to staff. Ongoing inspections of equipment and the plant environment is required to ensure that the conditions do not pose a food safety risk. Wooden utensils and pallets must be dedicated to the assigned task, maintained and periodically inspected to ensure that they remain in serviceable condition. Loose metal items in processing must be secured to prevent food safety issues. Knives used in processing and packaging must be kept clean and maintained. Snap off blades are not permitted in processing and storage areas. Glass inspections are to be performed.

15.4.2.6 Detection of Foreign Objects - The process for monitoring screens, filters and sieves must be documented and in place. Metal detectors must be designed in a manner that isolates rejected items. Metal detectors must be periodically verified and validated. Records of monitoring of metal detection, or similar devices and subsequent corrective actions resulting from nonconforming product must be maintained.

15.4.2.7 Managing Foreign Matter Contamination Incidents - When foreign material contamination occurs, affected batch must be isolated, inspected, reworked or disposed of. In cases of glass breakage, the areas where the breakage occurred must be completely cleaned.

15.4.2.8 Air Quality - Compressed air that contacts food, packaging, or food contact surfaces must be monitored to ensure that there is no food safety risk.

15.4.2.9 Loading, Transport, and Unloading Practices - The methods for loading and transporting must be documented and in place. The practices must not pose a food safety risk.

15.4.2.10 In-Store Sampling - The organization must have a documented policy for in-store sampling of food products.

15.4.3 Allergen Management - The methods to control allergens and prevent cross contact of allergens must be documented and included in the food safety plan. The product identification system ensures that clear identification and labeling in accordance with regulatory requirements of those products produced on equipment on which foods containing allergens were processed.

15.4.4 Stock Management - The responsibility and methods for ensuring effective stock rotation principles (using FIFO-first in first out) are applied must be documented and implemented.

<u>15.5 Water & Ice</u>

15.5.1.1 Water Supply - Hot and cold potable water must be available for hand washing and cleaning processes. Practices must ensure that potable water does not become contaminated.

15.5.1.2 Monitoring Water Microbiology and Quality - Water and ice used for handwashing, cleaning, or as an ingredient or processing aid for food must comply with local, national and international water potability and quality regulations.

15.5.1.3 Water Delivery - The delivery of water within the store must ensure potable water is not contaminated, if non-potable water is used for other purposes, it must not be cross contaminated with potable water.

11.5.1.4 Water Treatment - Water treatment, when used on site must be monitored, and if used as an ingredient or for cleaning, must be tested for potability.

15.5.1.5 Ice Supply - Ice when used for as an ingredient or in processing must be potable. Ice storage and handling equipment must not contaminate product.

15.5.1.6 Analysis - Water and ice used for handwashing, cleaning, or as an ingredient or processing aid must be tested for microbiological analysis of the water and ice supply and must comply with local, national and international water potability and quality regulations.

15.6 Waste Disposal

15.6.1 Waste Management - The process for collecting, handling and storing waste must be documented and in place. Waste must be regularly disposed of.

Waste transportation and storage bins and areas must be maintained to prevent harborage. The process for disposing of trademarked materials must be documented. Waste to be used for animal feed must be stored and handled in a manner to prevent food safety risks.

15.6.2 Salvage Operations/Reclamation - The responsibility and methods defining how product is disposed, donated, resold, restocked or reused must be documented and implemented.

15.6.3 Product Damage or Returns - System must be in place to maintain product safety when determining how to manage items found to be damaged and/or returned to the store by customers.

15.7 Receiving & Transportation

15.7.1 Transport

15.7.1.1 Loading - Vehicles used to transport product must be inspected before loading to ensure that the vehicle is clean and does not have odors. Loading methods must not pose a food safety risk. Vehicles shall be sealed with tamper proof seals, once loaded.

15.7.1.2 Transport - Refrigerated and hot holding vehicles must be verified when being loaded and periodically thereafter.

15.7.1.3 Delivery - Delivery of food off site to customer or consumer should not present a risk to food safety or security.

15.7.2 Receiving Products - Before unloading refrigerated vehicles, the temperatures must be verified and recorded. Unloading methods must not pose a food safety risk.

CONCLUSION

Since its initial release in 1994 the SQF Code has had an enormous impact on the food processing industry around the world.

In the short run, certifying to SQF has a major and positive impact on food safety, consistency of methods and cost reduction. An SQF certification can give businesses unmatched credibility. SQFI maintains a database of companies that have been SQF certified, these amount to the most preferred suppliers of food items within the industry.

In the long run, SQF implementation and certification will preserve and create domestic and international markets for American businesses in virtually every field. Even now, many major national and international food processors and retailers are requiring SQF certification of its suppliers.

There are many choices for food safety certification, but only one with the designation for "farm to fork".

SQF is a very stringent and comprehensive "farm to fork" quality and food safety program. It is designed to meet all areas of the food supply chain and is recognized by Global Food Safety Initiative as a credible program that can improve your facility's food safety, quality, and cost reduction.

SQF is recognized by companies all over the world that require HACCP food safety and quality programs by their suppliers.

Perry Johnson Food Safety Consulting, Inc.

We provide a variety of services based on our customers specific needs. Some of the services we provide are listed below. Contact a Program Coordinator to discuss your specific needs and timeline.

- SQF Complete Implementation Program
  - ➢ Gap Assessment . with action plan
  - ➢ Hands-On Training
  - ➢ Implementation Assistance
  - ➢ Development of Documentation*
  - ➢ Internal Audit Services

- HACCP Development

- Food Safety Manual Preparation

- Good Manufacturing Practices (GMPs)
  - ➢ Implementation
  - ➢ Documentation

- SQF Internal Auditor Training
  - ➢ We will train your audit team to perform regular internal audits as required by the standard

- SQF Internal Audit Services
  - ➢ PJFSC can prepare your audit plan
  - ➢ Conduct your audit
  - ➢ Address the nonconformances found during the audit

- Post certification assistance
  - ➢ Need help in correcting nonconformances? We can help!

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