SQF Food Safety Code for Manufacture of Food Packaging

EDITION 8

SQF INSTITUTE

One world. One standard.

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Suggestions for improvements to this Code are encouraged from all parties. Written comments are to be sent to SQFI at 2345 Crystal Drive, Suite 800, Arlington, VA, 22202, USA.

SQF Code, edition 8

The Safe Quality Food Institute's (SQFI) SQF Code, edition 8 has been updated and redesigned in 2017 for use by all sectors of the food industry from primary production to storage and distribution and now includes a food safety code for retailers. It replaces the SQF Code, edition 7.

The SQF Code is a site-specific, process and product certification standard with an emphasis on the systematic application of CODEX Alimentarius Commission HACCP principles and guidelines for control of food safety and food quality hazards.

Certification to the SQF Code supports industry- or company-branded product and offers benefits to certified sites and their customers. The implementation of an SQF System addresses a buyer's food safety and quality requirements and provides the solution for businesses supplying local and global food markets. Products produced and manufactured under SQF Code certification retain a high degree of acceptance in global markets.

First developed in Australia in 1994, the SQF program has been owned and managed by the Food Marketing Institute (FMI) since 2003, and was first recognized in 2004 by the Global Food Safety Initiative (GFSI)* as a standard that meets its benchmark requirements.

Certification of a site's SQF System by a Safe Quality Food Institute licensed certification body is not a statement of guarantee of the safety of the site's product, or that it meets all food safety regulations at all times. However, it is an assurance that the site's food safety plans have been implemented in accordance with the CODEX HACCP method as well as applicable regulatory requirements and that the System has been verified and determined effective to manage food safety. Further, it is a statement of the site's commitment to

1. produce safe, quality food,
2. comply with the requirements of the SQF Code, and
3. comply with applicable food legislation.

SQF Code, edition 8 is applicable to all certification and surveillance audits conducted after January 2, 2018. Those sites with an existing SQF certification will be required to upgrade their Systems to meet the requirements outlined in edition 8 by that date.

This reference document is published in English, but is also available in other languages. Where there is any divergence between the translated version and the reference document, the English reference document will prevail. For further definition of words used in this document, please refer to *Appendix 2: Glossary.*

**The Global Food Safety Initiative (GFSI) is an industry initiative established by the international trade association, the Consumer Goods Forum.*

Contents

Part A: Implementing and Maintaining the SQF Food Safety Code for Manufacture of Food Packaging

The SQF Code is a food safety code for all sectors of the food supply chain from primary production through to food retailing and the manufacture of food packaging. Edition 8 is now available in separate documents depending on the industry sector.

This document covers the food safety system for Manufacture of Food Packaging Other documents are available for:

SQF Food Safety Fundamentals (for small businesses)

The SQF Food Safety Code for Primary Production

The SQF Food Safety Code for Storage and Distribution

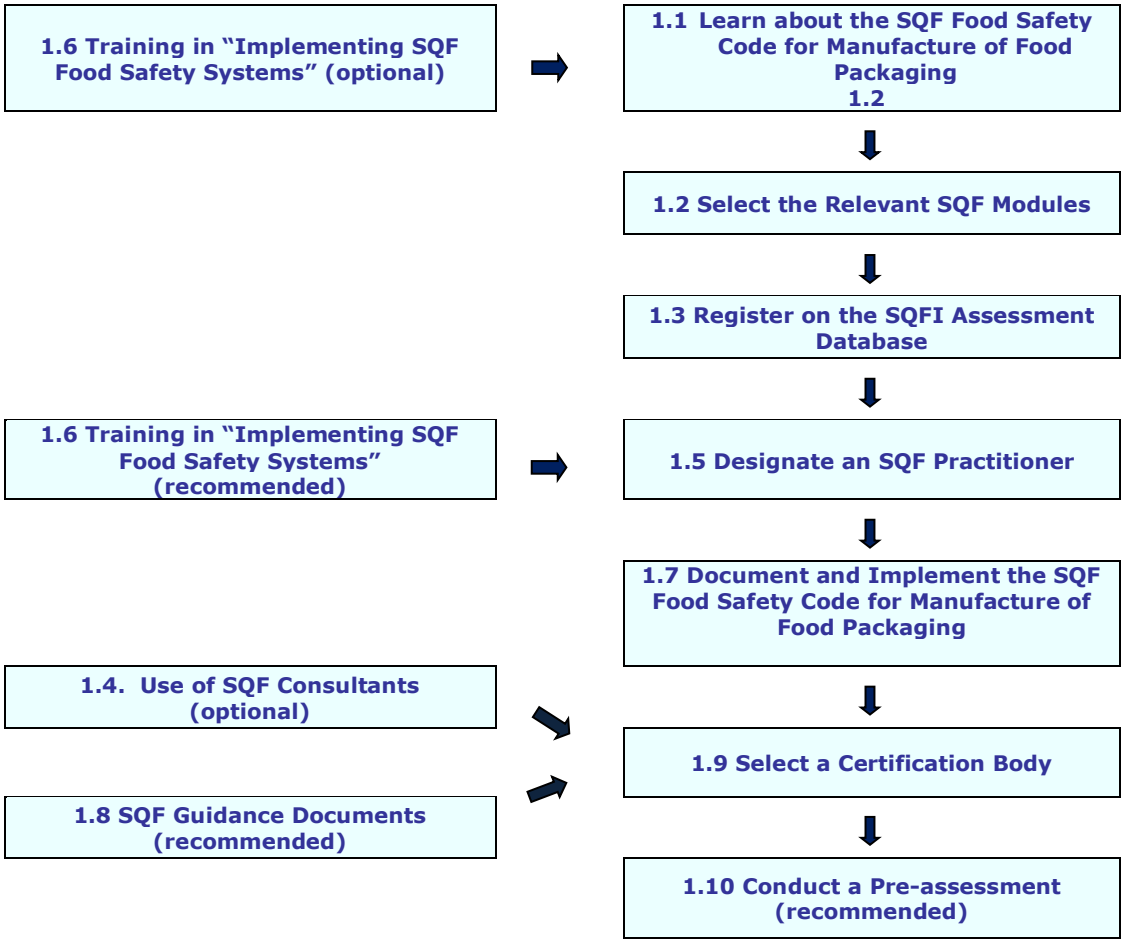
The SQF Food Safety Code for Manufacturing

The SQF Food Safety Code for Food Retail

The SQF Quality Code

1. Preparing for Certification

Figure 1: Steps for Certification



1.1 Learn about the SQF Food Safety Code for Manufacture of Food Packaging

There are several ways to learn how to implement the SQF Food Safety Code for Manufacture of Food Packaging within your site. The following options are available:

- Attend a training course "Implementing SQF Food Safety Systems" (refer Part A, 1.6) through a licensed SQF training center (recommended);
- Take the online training course "Implementing SQF Food Safety Systems" available from the SQFI website (sqfi.com). This course is primarily for food manufacturers however, the basic principles may be helpful;
- Train yourself by downloading the SQF Food Safety Code for Manufacture of Food Packaging from the SQFI website (sqfi.com) free of charge, and read how to apply it to your industry sector.

1.2 Select the Relevant SQF Modules

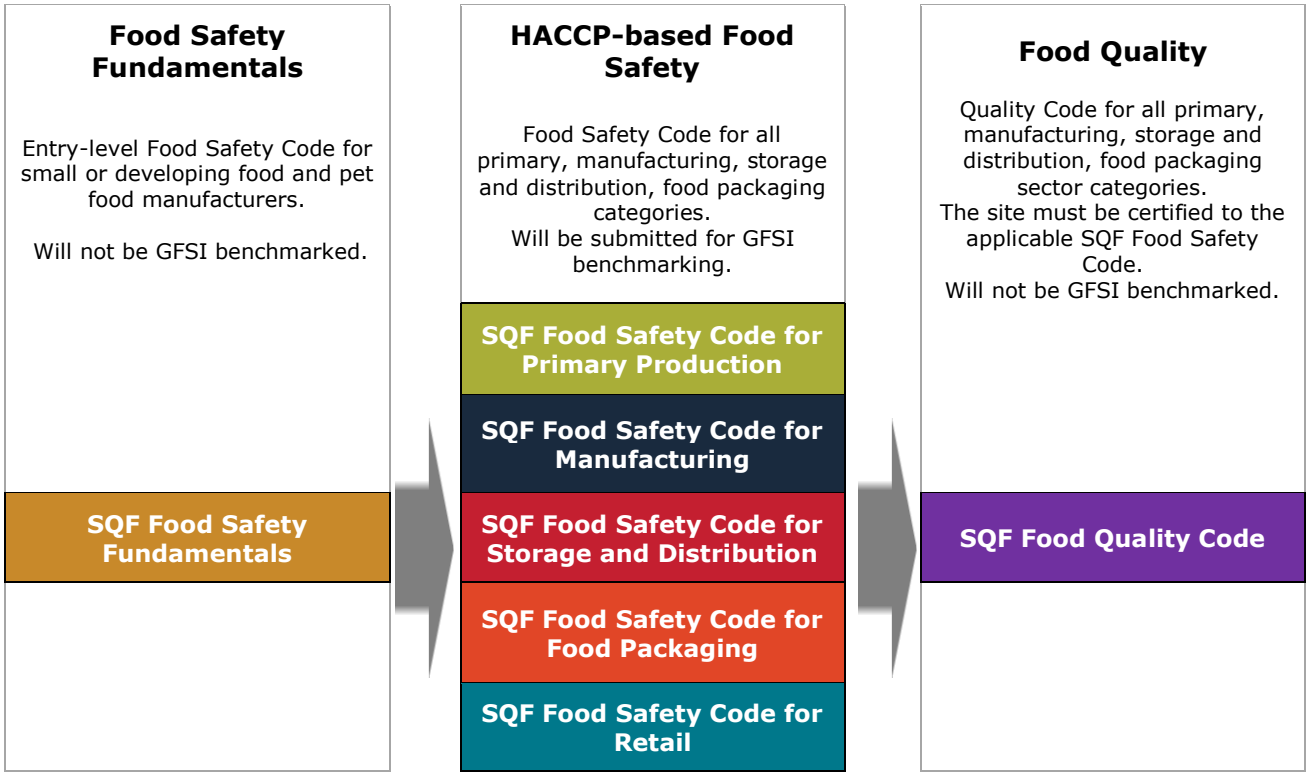
SQFI recognizes that food safety practices differ depending on the food safety risk to the product and the process, and has designed the SQF Food Safety Code for Manufacture of Food Packaging to meet the requirements of the industry sector.

The SQF food sector categories and applicable modules are listed in full in Appendix 1. It includes a more detailed description with examples, level of risk, and the relationship with the Global Food Safety Initiative (GFSI) industry scopes outlined in the GFSI Requirements Document.

However the following provides a guide to the SQF Code and Module that apply to the manufacture of food packaging industry sector.

This document contains the certification program owner management requirements (Part A), and the system elements, and Good Manufacturing (GMP) modules for the Manufacture of Food Packaging (Part B).

All food packaging manufacturers are required to implement the food packaging system elements plus the applicable Good Manufacturing Practices (GMP) module:



SQF Food Safety Code for Manufacture of Food Packaging		
Fsc	**Category**	**Applicable GMP Modules**
27	Manufacture of Food Packaging	Module 13: GMP for manufacture of food packaging

While the food sector category lists the finished product the certification body shall provide auditors or technical experts that represent all the processes that are within the scope of certification.

1.3 Register on the SQF Database

To be considered for SQF certification, sites are required to register in the SQFI assessment database. The database can be accessed from the SQFI website (sqfi.com).

Registration is annual, and there is a fee per site payable at registration and renewal. The fee scale is dependent on the size of the site as determined by gross annual sales revenue. The fee scale is available on the SQFI website (sqfi.com).

Sites must register with SQFI prior to achieving certification, and must remain registered at all times to retain their certification. If the site fails to maintain registration, the certificate will be invalid until the site is properly registered in the SQFI assessment database.

1.4 Use of SQF Consultants

Sites can choose to develop and implement their SQF Food Safety System using their own qualified resources or they can utilize the services of a registered SQF consultant. All SQF consultants are registered by the SQFI to work in specific food sector categories (refer Appendix 1). They are issued with an identity card indicating the food sector categories in which they are registered. Sites are encouraged to confirm an SQF consultant's registration details on the SQFI website (sqfi.com) before engaging their services. The criteria outlining the requirements necessary to qualify as an SQF consultant and the application forms are available at on the SQFI website (sqfi.com). The SQF Consultant Code of Conduct outlines the practices expected of SQF consultants.

1.5 Designate an SQF Practitioner

Whether or not an SQF consultant is used, the SQF Food Safety Code for Manufacture of Packaging Materials requires that every site has a suitably qualified SQF practitioner to oversee the development, implementation, review and maintenance of the SQF System, including the Good Manufacturing Practices and food safety plans. The requirements for an SQF practitioner are described in the system elements, 2.1.2.4 and 2.1.2.5.

Some sites may choose to have more than one SQF practitioner to meet shift and operational requirements.

1.6 SQF Implementation Training

An "Implementing SQF Food Safety Systems" training course is available through the SQFI network of licensed training centers. Employees who are responsible for designing, implementing and maintaining the requirements of the SQF Food Safety Code for Manufacture of Food Packaging are encouraged to participate in a training course. Details about the training centers and the countries in which they operate are available at sqfi.com. The dates and locations of the courses can be obtained by directly contacting the training centers.

The "Implementing SQF Food Safety Systems" training course is not mandatory for SQF practitioners, but is strongly recommended.

The SQFI also has an "Implementing SQF Food Safety Systems" online training course which can be accessed from the SQFI website (sqfi.com). The online training solution is a web-based education portal where staff can enroll and complete SQF systems training in their own time and at their own pace.

Training in other food industry disciplines, such as HACCP, Good Manufacturing Practices (GMP) and Internal Auditing may also be required and licensed SQF training centers can provide details of the other training courses they provide.

1.7 Document and Implement the SQF Food Safety Code for Manufacture of Food Packaging

To achieve SQF food safety certification, the site must document and implement the system elements and the relevant GMP Module of the SQF Food Safety Code for Manufacture of Food Packaging (refer Part A, 1.2). This requires a two stage process:

Document the SQF System – prepare policies, procedures, work instructions and specifications that meet the system elements and GMP Module of the SQF Food Safety Code for Manufacture of Food Packaging. In other words, "say what you do."

Implement the SQF System – implement the prepared policies, procedures, work instructions and specifications, and keep records to demonstrate compliance to the relevant modules of the SQF Food Safety Code for Manufacture of Food Packaging. In other words, "do what you say." SQFI recommends that a minimum of two months of records be available before a site audit is conducted.

1.8 SQF Guidance Documents

Guidance documents are available for some SQF modules and food sector categories from the SQFI website (sqfi.com). These documents are available to help the site interpret the requirements of the SQF Code and assist with documenting and implementing an SQF System. The documents are developed with the assistance of food sector technical experts.

The guidance documents are available to assist the site, but are not auditable documents. Where there is a divergence between the guidance document and the SQF Food Safety Code for Manufacture of Food Packaging, the SQF Code in English prevails.

1.9 Select a Certification Body

Certification bodies are licensed by SQFI to conduct SQF audits and issue the SQF certificate. SQFI licensed certification bodies are required to be accredited to the international standard ISO/IEC 17065:2012 (or subsequent versions as applicable) and be subject to annual assessments of their certification activities by SQFI licensed accreditation bodies.

The site is required to have an agreement with a certification body in place at all times which outlines the SQF audit and certification services provided. These include as a minimum:

i. The scope of certification (refer Part A, 2.2)

ii. The expected time to conduct and finalize the audit and the reporting requirements;

iii. The certification body's fee structure;

iv. The conditions under which the SQF certificate is issued, withdrawn or suspended; and

v. The certification body's appeals, complaints and disputes procedure.

A current list of licensed certification bodies is available on the SQFI website (sqfi.com). Certification bodies are also listed in the SQFI assessment database and sites can request a quote or select a certification body online once they have registered.

Sites seeking to implement an SQF multi-site program (refer Appendix 4) must indicate this in their application to the certification body. The agreed multi-site program, including the identification of the central site and number and names of the sub-sites, must be included in the agreement with the certification body.

1.10 Conduct a Pre-assessment Audit

A pre-assessment audit is not mandatory, but is recommended to provide a "health check" of the site's implemented SQF food safety System for the manufacture of food packaging. A pre-assessment audit can assist in identifying gaps so that corrective action can occur before engaging the selected certification body for a full certification audit. It can be conducted using internal resources, an SQF consultant, or an SQF food safety auditor.

2. The Initial Certification Process

2.1 Selection of the SQF Auditor(s)

SQF food safety auditors must be employed by or contracted to an SQFI licensed certification body, and must be registered with SQFI.

The certification body shall select the most appropriate qualified SQF food safety auditor(s) for the site's SQF certification audit, including vertically integrated sites. The SQF food safety auditor must be registered for the same food sector category (ies) as the site's scope of certification (refer Part A, 2.2). The certification body shall ensure no SQF food safety auditor conducts audits of the same site for more than three consecutive certification cycles.

The certification body must advise the site of the name of the SQF food safety auditor at the time that the SQF audit is scheduled. The site may check the registration and food sector category (ies) of the SQF food safety auditor in the register on the SQFI website (sqfi.com).

2.2 Identifying the Scope of Certification

The scope of certification shall be clearly identified and agreed upon between the site and certification body prior to the initial certification audit and included in the scope of the initial certification audit and all subsequent audits (Part A, refer 2.4). The scope of certification shall determine the relevant system elements and GMP modules to be documented and implemented by the site and audited by the certification body, and cannot be changed during or immediately following a certification or re-certification audit.

For requirements on changing the scope of certification, refer Part A, 5.1.

The scope of certification shall include:

- **The site**. SQF certification is site specific. The entire site, including all premises, support buildings, silos, tanks, loading and unloading bays and external grounds must be included in the scope of certification. Where a site seeks to exempt part of the premises, the request for exemption must be submitted to the certification body in writing prior to the certification audit, detailing the reason for exemption. If approved by the certification body, exemptions shall be listed in the site description in the SQFI assessment database and in audit reports(s). However, all parts of the premises that are involved in the manufacture of food packaging and process that are involved with the production, manufacturing and storage of products included in the scope cannot be exempted.

When activities are carried out in different premises but are overseen by the same senior, operational, and technical management, and are covered by the one SQF System, the site can be expanded to include those premises.

Exempted parts of the site must not be promoted as being covered by the certification. Instances where promotion of exempted equipment or areas of the site are identified and substantiated (either by regular audit or by other means) shall result in immediate withdrawal of the SQF certification.

- **The products.** SQF certification is product specific. The food sector category and food packaging manufactured products processed and handled on site shall be identified and agreed in the scope of certification. Where a site seeks to exempt any food packaging manufactured products processed or handled on site, the request for exemption must be submitted to the certification body in writing prior to the certification audit, explaining the reason for exemption. If approved by the certification body, product exemptions shall be listed in the site description in the SQFI assessment database and in audit reports (s).

Exempted food packaging must not be promoted as being covered by the certification. Instances where promotion of exempted products or processes are identified and substantiated (either by regular audit or by other means) shall result in immediate withdrawal of the SQF certificate. The scope of certification forms part of the certificate. It describes the location of the site, the food sector categories (refer Appendix 1) and the food packaging products manufactured and handled on that site

All food packaging manufactured, produced, stored, or processed on the site shall be included on the site's certificate, unless exempted by the site. The site must demonstrate that exemptions of part of the site or products from the scope of certification does not put certificated product at food safety risk.

2.3 The Initial Certification Audit

The SQF certification audit consists of two stages:

i. The desk audit is undertaken to verify that the site's SQF System documentation meets the requirements of the SQF Food Safety Code for Manufacture of Food Packaging.

ii. The site audit is conducted on site and determines the effective implementation of the site's documented SQF Food Safety System.

2.4 Identifying the Scope of the Audit

The site and the certification body shall agree on the audit scope before the certification audit begins. The scope of the audit shall include:

- The agreed scope of certification including any approved exemptions (refer Part A, 2.2);
- The version of the SQF food safety Code for Manufacture of Food Packaging, and the applicable module(s);
- The audit duration (refer Part A, 2.5);
- The designated registered SQF food safety auditor; and
- The certification body's fees structure including travel time, report writing, ancillary costs, and costs for close-out of non-conformities.

Once the audit scope is agreed between the site and the certification body, it cannot be changed once the audit has commenced.

2.5 Audit Duration Guide

Once the certification body and site have agreed on the scope of certification, the number of different food packaging products manufactured and handled on the site, the certification body shall provide the site with an estimate of the time it will take to complete the certification audit.

The audit times will vary according to the size and complexity of the site operations. Factors that can impact on the audit duration include:

i. The scope of the audit;

ii. The size of the site and the design of product and people flows;

iii. The number and complexity of product lines and the overall process;

iv. The complexity of the SQF System design and documentation;

v. The level of mechanization and labor intensiveness;

vi. The ease of communication with company personnel (consider different languages spoken);

vii. The cooperation of the site's personnel.

Tables 2 and 3 provide a guide to the duration of an SQF certification audit. Justification is required if the certification body deviates from this guide by greater than thirty (30) percent.

This is a guide only, and the certification body must determine the duration of each certification audit based on the scope of certification, the food safety risk, and the complexity of the processes.

Table 2: Desk Audit Duration Table

Code	Basic duration (days)
Sites employing less than 10 people	0.5 days
All other sites	1.0 days

Table 3: Site Audit Duration Table

Step 1	Step 2	Step 3	
Code	Basic duration (days) (includes three HACCP plans)	Additional Days based on Number of employees	Additional Days based on Size of Site
Food packaging manufacturer employing less than 10 people	1.0	1 to 200 = 0 201 to 400 = 0.5 401 to 600 = 1.0 601 to 1000 =1.5 1001 to 2500 = 2.0 2501 to 4000= 2.5 > 4,000 = 3.0	0 – 200,000 ft^2 = 0 (0 – 19,000 m^2 = 0) 200,001 – 300,000 ft^2 = 0.5 (19,001 – 27,000 m^2 = 0.5) 300,001 – 500,000 ft^2 = 1.0 (27,001 – 46,000 m^2 = 1.0)
All other food packaging manufacturer Additional time for each HACCP plan(s) *(where there are multiple / different plans)*	2.0 0.5 day per additional 3 HACCP plans or 3 packaging processes		

In addition to audit time, the certification body shall provide the site with the time and expected costs for planning, travel, report writing, and close out of non-conformities.

2.6 The Desk Audit

An independent desk audit is conducted by the certification body only for initial certification. The desk audit is conducted by the registered SQF food safety auditor appointed by the certification body, and ensures:

i. An appropriately qualified SQF practitioner is designated;

ii. The food safety plan and the associated critical control point (CCP) determinations, validations and verifications are appropriately documented and endorsed by the SQF practitioner;

iii. The documented system is relevant to the scope of certification

The certification body shall notify the site of corrections or corrective action, or any aspects of the SQF food safety system that requires improvement or adjustment. The certification body will also verify that corrections or corrective action for all non-conformities have been addressed before proceeding with a site audit.

Desk audits are not scored or rated and the close out times indicated in Part A, 3.2 do not apply.

2.7 The Site Audit

The site audit is conducted on site by the SQF food safety auditor appointed by the certification body. It is conducted at a time agreed between the site and the certification body when the main processes are operating. The site audit must include a review of the entire site, including the inside and outside of the building, regardless of the scope of certification and agreed exemptions. The site audit shall include a review of all operational and cleaning shifts and pre-operational inspections, where applicable.

The site audit determines if the SQF system is effectively implemented as documented. It establishes and verifies the:

i. Effectiveness of the SQF food safety System in its entirety;

ii. Food safety hazards are effectively identified and controlled;

iii. Effective interaction between all elements of the SQF system; and

iv. Level of commitment demonstrated by the site to maintaining an effective SQF system and to meeting their food safety regulatory and customer requirements.

v. The exempted products or areas of the site do not pose a food safety risk to the products covered under certification.

2.8 Corporate Audits

Where a site is part of a larger corporation and some food safety functions are conducted at a corporate head office (i.e. an office that does not process or handle products), an optional a corporate audit can be conducted by the certification body of the Code elements managed by the corporate office.

The decision on whether a separate corporate audit is required shall be made by agreement between the certification body and the site and communicated to SQF certified sites managed by the corporate office.

Where a corporate audit is conducted, the audit evidence shall be reviewed and all identified corporate non-conformities closed out before the site audits are conducted. Any open non-conformities shall be attributed to the site or sites.

The SQF food safety auditor shall also audit the application of the corporate functions relative to the site's scope of certification during the audit of each site managed by the corporate office. All mandatory and applicable elements of the SQF Food Safety Code shall be audited at each site irrespective of the findings of the corporate audit.

Corporate Head Office audits do not apply to designated central sites within an SQF multi-site program (refer Appendix 4).

2.9 System Elements

All applicable system elements and the relevant GMP module (s) shall be assessed as part of the certification audit. Where an element is not applicable and appropriately justified, it shall be stated as "not applicable" (N/A) by the SQF food safety auditor in the audit report.

Within the system elements, the elements listed below are mandatory elements that cannot be reported as "not applicable" or "exempt" and must be audited and compliance/non-compliance reported. The mandatory elements are:

2.1.1 Food Safety Policy
2.1.2 Management Responsibility
2.1.3 Management Review
2.1.4 Complaint Management
2.2.1 Food Safety Management System
2.2.2 Document Control
2.2.3 Records
2.4.1 Food Legislation
2.4.2 Good Manufacturing Practices
2.4.3 Food Safety Plan
2.4.4 Approved Supplier Program
2.4.7 Product Release
2.5.1 Validation and Effectiveness
2.5.2 Verification Activities
2.5.3 Corrective and Preventative Action
2.5.5 Internal Audits and Inspections
2.6.1 Product Identification
2.6.2 Product Traceability
2.6.3 Product Withdrawal and Recall
2.7.1 Food Defense Plan
2.8.1 Allergen Management
2.9.2 Training Program

Mandatory elements are designated with "Mandatory" in the system elements in the SQF Food Safety Code for Manufacture of Packaging Materials

2.10 Non-conformities

Where the SQF food safety auditor finds deviations from the requirements of relevant modules of the SQF Food Safety Code for Manufacture of Food Packaging the SQF food safety auditor shall advise the site of the number, description, and extent of the non-conformities. Non-conformities may also be referred to as non-conformances.

Non-conformities against the SQF Food Safety Code for Manufacture of Food Packaging shall be graded as follows:

- **A minor non-conformity** is an omission or deficiency in the SQF System that produces unsatisfactory conditions that if not addressed may lead to a risk to food safety but not likely to cause a system element breakdown.
- **A major non-conformity** is an omission or deficiency in the SQF System producing unsatisfactory conditions that carry a food safety risk and are likely to result in a system element breakdown.
- **A critical non-conformity** is a breakdown of control (s) at a critical control point, a pre-requisite program, or other process step and judged likely to cause a significant public health risk and/or where product is contaminated.
  A critical non-conformity is also raised if the site fails to take effective corrective action within the timeframe agreed with the certification body, or if the certification body deems that there is systemic falsification of records relating to food safety controls and the SQF System.

Critical non-conformities cannot be raised at desk audits. Timelines for the resolution of corrective actions are addressed in Part A: 3.2 Site Corrective Actions.

2.11 Audit Evidence Record and Audit Report

The SQFI provides the certification body with the electronic audit checklist to be used by the SQF food safety auditors when conducting SQF food safety audits. The SQF food safety audit checklist is available from the SQFI assessment database and is customized for SQF industry sector. The SQF checklist is designed to ensure the uniform application of SQF food safety audit requirements. It is used by SQF food safety auditors to record their findings and determine the extent to which site operations comply with stated requirements (i.e. the audit evidence record)

Mandatory elements (refer to Part A, 2.9 above) must be reported for the SQF food safety audit report to be submitted.

Non-conformities identified during the SQF food safety audit shall be accurately described in the SQF food safety audit report and shall fully describe the clause of the SQF Food Safety Code for Manufacture of Food Packaging and the reason for the non-conformity. Non conformity reports shall be left with the site by the SQF food safety auditor before the close of the site audit.

The electronic audit evidence record shall be completed by the SQF auditor and provided to the certification body for technical review.

The certification body shall review and approve the audit evidence record and make it available to the site within ten (10) calendar days from the last day of the audit. A final audit report, with completed and approved corrective actions shall be made available to the site before the final certification decision is made (45) calendar days from the last day of the site audit (refer Part A, 3.4)

The SQF food safety audit reports shall remain the property of the site and shall not be distributed to other parties without the permission of the site.

3. The Initial Certification Decision

3.1 Responsibility for the Certification Decision

It is the responsibility of the certification body to ensure that audits undertaken by their SQF food safety auditors are thorough, that all requirements are fulfilled, and the audit report is complete. The audit report is in draft form and the audit evidence is only recommended until technically reviewed and approved by the authorized certification manager of the certification body.

The certification decision shall be made by the certification body based on the evidence of compliance and non-conformity recommended by the SQF food safety auditor during the SQF audit. Although SQFI provides guidance on certification, the certification body is responsible for deciding whether or not certification is justified and granted based on the objective evidence provided by the SQF food safety auditor.

Any certification decisions that are made outside the scope of this clause require the certification body to provide written justification to SQFI.

3.2 Site Audit Corrective Actions

All non-conformities and their resolution shall be documented by the SQF food safety auditor. The close-out timeframe for major and minor non conformities identified below apply to the site audit only.

- **A minor non-conformity** shall be corrected, verified and closed out by the SQF food safety auditor within thirty (30) calendar days of the completion of the site audit. Extensions may be granted by the certification body where there is no immediate threat to product safety, and alternative, temporary methods of control are initiated. The site shall be advised of the extended timeframe. Where an extension is granted, the non-conformity shall still be closed out and the SQF food safety auditor shall document all details of justification of the extension, how the risk is being controlled, and the agreed completion date.

- **A major non-conformity** shall be corrected and appropriate corrective action verified and closed out within thirty (30) calendar days of the completion of the site audit.

  In circumstances where the corrective action involves structural change or cannot be corrected due to installation lead times, this period can be extended provided the corrective action time frame is acceptable to the certification body and temporary action is taken by the site to mitigate the risk to product safety. However, in such cases, the non-conformity shall be closed out and the SQF food safety auditor shall document all details of justification of the extension, how the risk is being controlled, and the agreed completion date. A documented root cause analysis shall be submitted by the site as part of the corrective action evidence for every major non-conformity.

- If the SQF food safety auditor considers that a **critical non-conformity** exists during a certification audit, the SQF food safety auditor shall immediately advise the site and notify the certification body. A critical non-conformity raised at an initial certification audit results in an automatic failure of the initial certification audit, and the site must re-apply for certification (refer Part A, 3.5).

3.3 Audit Score and Rating

Based on the evidence collected by the SQF food safety auditor, each applicable aspect of the SQF certification food safety audit is automatically scored in the audit report. Desk audits are not scored.

The calculation uses the following factors:

0 aspect meets the criteria

1 aspect does not meet the criteria due to minor variations (minor non-conformity)

10 aspect does not meet the criteria (major non-conformity)

50 aspect does not meet the criteria (critical non-conformity)

A single rating is calculated for the site audit as (100 – N) where N is the sum of the individual rating criteria allocated. The rating provides an indication of the overall condition of the site against the SQF Food Safety Code

for Manufacture of Food Packaging, and also provides a guideline on the required level of surveillance by the certification body. The audit frequency at each rating level is indicated as follows:

Score	Rating	Certification[1]	Audit Frequency
96 - 100	E - Excellent	Certificate issued	12 monthly re-certification audit
86 - 95	G – Good	Certificate issued	12 monthly re-certification audit
70 – 85	C - Complies	Certificate issued	6 monthly surveillance audit
0 - 69	F – Fails to comply	No certificate issued	Considered to have failed the SQF audit

[1.] Certification also requires that all major and minor non-conformities are closed out within thirty (30) calendar days.

3.4 Granting Certification

Certification of the SQF System shall be awarded to sites that achieve a "C - complies" audit rating or greater with no outstanding non-conformities. The certification decision shall be made within forty-five (45) calendar days of the last day of the site audit. Once SQF certification is granted, the SQFI issues a unique certification number which is specific to that site.

Within ten (10) calendar days of granting certification, the certification body shall provide an electronic and/or hard copy of the site's certificate. The certificate is valid for seventy-five (75) days beyond the anniversary of the initial certification audit date.

The certificate shall be in a form approved by the SQFI and include:

i. The name, address and logo of the certification body;

ii. The logo of the accreditation body, and the certification body's accreditation number;

iii. The heading "certificate;"

iv. The phrase "(site name) is registered as meeting the requirements of the SQF Food Safety Code for Manufacture of Food Packaging , edition 8;"

v. The scope of registration – SQF Food Safety Code for Manufacture of Food Packaging, edition 8, food sector category (ies) and products;

vi. Dates of audit (last day), date of next re-certification audit, date of certification decision, and date of certificate expiry;

vii. Indication of unannounced re-certification audit (where applicable);

viii. Signatures of the authorized officer and issuing officer;

ix. SQF logo.

Certified sites information shall be posted to the SQFI website (sqfi.com).

3.5 Failure to Comply

Where a site achieves an "F – fails to comply" rating at a certification audit, the site is considered to have failed the SQF audit, and must then re-apply for another site audit.

When the site's re-application occurs within six (6) months of the last audit date, and with the same certification body, a site audit shall be scheduled but a desk audit is not required. If the re-application occurs after six (6) months from the last audit date, or with a new certification body, then a desk audit and site audit are required.

4. Surveillance and Re-certification

4.1 Maintaining Certification

To maintain SQF food safety certification, a site is required to attain a "C - complies" audit rating or greater at re-certification audits, ensure that surveillance and/or re-certification audits occur within the required timeframe, ensure that no critical non-conformities are raised at surveillance or re-certification audits, and that all major and minor non-conformities are corrected within the time frame specified.

All re-certification audits shall be considered announced unless otherwise indicated as unannounced on the audit report and certificate.

4.2 Surveillance Audit

The surveillance audit is conducted when the site attains a "C - complies" rating at a certification audit or re-certification audit. The surveillance audit shall be conducted within thirty (30) calendar days either side of the six (6) month anniversary of the last day of the previous certification or re-certification audit.

A new score and rating is issued at the surveillance audit, but the re-certification audit date is not affected.

The surveillance audit is a full SQF site food safety System audit. In particular, the surveillance audit is intended to:

i. Verify the continued efficacy of corrections and corrective actions closed out at previous audits;

ii. Verify that the SQF System continues to be implemented as documented;

iii. Consider and take appropriate action where changes to the site's operations are made and the impact of those changes on the site's SQF System;

iv. Confirm continued compliance with the requirements of the SQF Food Safety Code for Manufacture of Food Packaging;

v. Verify all critical steps remain under control; and

vi. Contribute to continued improvement of the site's SQF System and business operation.

Major or minor non-conformities raised at the surveillance audit shall be closed out as indicated in Part A, 3.2.

4.3 Re-certification Audit

The re-certification audit of the SQF System is undertaken to verify the continued effectiveness of the site's SQF System in its entirety.

The re-certification audit shall be conducted within thirty (30) calendar days either side of the anniversary of the last day of the initial certification audit.

The re-certification audit score is calculated in the same way as the initial certification audit, and the same rating applied (refer Part A, 3.3).

Written approval by the SQF Compliance Manager is required to issue a temporary extension to a site's re-certification audit timeframe and certificate expiry date including instances in extreme circumstances such as acts of nature or extreme weather.

Situations that require a permanent change to the re-certification audit date require written approval by the SQF Compliance Manager and the site's new re-certification date may be moved earlier than the anniversary and the new re-certification date fixed as the new initial certification audit date.

All extension requests shall come from the certification body that issued the site's SQF certificate.

The purpose of the re-certification audit is to:

i. Verify the continued efficacy of corrections and corrective actions closed out at previous audits;

ii. Verify that the SQF food safety System continues to be implemented as documented;

iii. Verify that internal audits, annual reviews of the crisis and food defense plans and recall system, and management reviews have been effectively completed;

iv. Verify that corrective and preventative actions have been taken on all non-conformities;

v. Consider and take appropriate action where changes to the site's operations are made and the impact of those changes on the site's SQF food safety System;

vi. Verify all critical steps remain under control and the effective inter-action between all elements of the SQF System;

vii. Verify the overall effectiveness of the SQF System in its entirety in the light of changes in operations;

viii. Verify that the site continues to demonstrate a commitment to maintaining the effectiveness of the SQF System and to meeting regulatory and customer requirements; and

ix. Contribute to continued improvement of the site's SQF System and business operation.

4.4 Variations to the Re-certification Process

The requirements for the re-certification audit are the same as those described in Part A 2.1 – 3.4 for the certification audit, with the following exceptions:

i. An independent desk audit is not required as part of a re-certification audit. However, an integrated desk and site audit shall be conducted at each re-certification. The site's documentation shall be reviewed as necessary as part of the site audit.

ii. If the site fails to permit the re-certification or surveillance audit within the agreed timeframe, the certification body shall immediately suspend the site's certificate.

iii. If the site receives an "F – fails to comply" rating at the re-certification or surveillance audit, the certification body shall immediately suspend the site's certificate.

If the site fails to close out non-conformities within the agreed timeframe, the certification body shall immediately suspend the site's certificate.

4.5 Unannounced Re-certification Audit

Within three (3) certification cycles the certification body shall conduct one (1) unannounced re-certification audit of the site. The unannounced food safety audit shall occur in the site's site within the sixty (60) day re-certification window (i.e., the anniversary date of the initial certification audit +/- thirty (30) days). SQF sites shall be required to undertake one (1) unannounced audit within the three (3) year certification cycle.

i. The site's certification cycle begins with the initial certification audit date. Unannounced re-certification audits shall occur once in every three (3) certification cycles.

ii. Unannounced audits shall not be conducted on the initial certification audit or on a surveillance audit.

iii. If a site changes certification bodies, the site's unannounced re-certification audit schedule shall not change.

iv. The unannounced re-certification audit shall follow the protocol under the SQF Code, Part A, 4.3, 4.4.

v. Those sites that fall under the SQF multi-site program are exempted from unannounced audits.

vi. The unannounced audit year shall be determined between the site and certification body.

vii. The date of the unannounced audit shall be determined by the certification body within the sixty (60) day re-certification audit window.

viii. A defined blackout period shall be established when the site is not operating for legitimate business reasons.

ix. Immediate suspension of the site certificate will occur in facilities that refuse entry to the SQF food safety auditor for an unannounced audit.

x. Certificates issued following unannounced re-certification audits shall indicate that the audit was unannounced.

A site may forgo the three year certification cycle requirement and voluntarily elect to have annual unannounced re-certification audits. If annual unannounced re-certification audits are conducted by the site then the protocol outlined for the three year certification cycle audit shall be followed. Sites with annual unannounced re-certification audits shall be recognized on the SQF certificate as an "SQFI select site."

4.6 Suspending Certification

The certification body shall suspend the SQF certificate if the site:

i. fails to permit the re-certification or surveillance audit,

ii. receives an "F – fails to comply" rating,

iii. fails to take corrective action within the timeframe specified for major non-conformities,

iv. fails to permit an unannounced audit,

v. fails to take corrective action within the timeframe specified in Part A, 3.2,

vi. where in the opinion of the certification body, the site fails to maintain the requirements of the SQF Food Safety Code for Manufacture of Food Packaging .

Where the site's certificate is suspended, the certification body shall immediately amend the site details on the SQFI assessment database to a "suspended" status indicating the reason for the suspension and the date of effect; and in writing:

i. inform the site of the reasons for the action taken and the date of effect;

ii. copy the SQF Compliance Manager on the notice of suspension sent to the site,

iii. request that the site provides to the certification body, within forty-eight (48) hours of receiving notice of the suspension, a detailed corrective action plan outlining the corrective action to be taken.

When the site's certificate is suspended, the certification body shall upon receipt of the detailed corrective action plan:

i. Verify that the immediate correction has been taken by the means of an on-site visit within thirty (30) calendar days of receiving the corrective action plan;

ii. When corrective action has been successfully implemented, re-instate the site status on the SQFI assessment database and give written notice to the site that their certificate is no longer suspended;

iii. Not more than six (6) months after suspension, the certification body shall conduct a further unannounced site visit to verify the effective implementation of the corrective action plan and that the site's SQF System is achieving stated objectives; and

iv. Copy SQFI on the notice indicating lifting of the suspension sent to the site.

When a certification body has suspended a site's SQF certificate, for the duration of suspension, the site shall not represent itself as holding an SQF certificate.

4.7 Withdrawing Certification

The certification body shall withdraw the certificate when the site:

i. Has been placed under suspension and fails to submit approved corrective action plans as defined by the certification body within forty-eight (48) hours of receiving notice of the suspension, or fails to take approved corrective action as determined by the certification body within the time frames specified;

ii. Has falsified its records;

iii. Fails to maintain the integrity of the SQF certificate; or

iv. Has an administrator, receiver, receiver and manager, official manager or provisional liquidator appointed over its assets or where an order is made or a resolution passed for the closure of the site (except for the purposes of amalgamation or reconstruction) or the site ceases to carry on business or becomes bankrupt, applies to take the benefit of any law for the relief of bankrupt or insolvent debtors or makes any arrangement or composition with its creditors.

When the site's certificate is withdrawn, the certification body shall immediately amend the site's details on the SQFI assessment database to a "withdrawn" status indicating the reason for the withdrawal and the date of effect; and in writing:

i. Inform the site that the SQF certificate has been withdrawn, the reason for such action and the date of effect; and

ii. Copy SQFI on the notice of withdrawal sent to the site,

iii. Instruct the site to return the certificate within 30 days of notification

A site that has their certificate withdrawn must re-apply for certification.

A site that has their certificate withdrawn will not be permitted to apply for certification for twelve (12) months from the date the certificate was withdrawn by the SQFI Certification Body. The withdrawn site will be posted on the SQFI website for twelve (12) months.

5. Obligations of Sites and Certification Bodies

5.1 Changing the Scope of Certification

When a site wishes to change their scope of certification, the site may request the increased scope of certification in writing with the certification body.

The certification body shall conduct a site audit of the additional processes or product and shall either issue a new certificate, or advise the site in writing why the new certificate cannot be issued.

An audit for an increase in scope shall not change the re-certification date or certificate expiry date. When a new certificate is issued, the re-certification audit date and certificate expiry date shall remain as per the original certificate.

The certification body shall make the appropriate scope changes to the site record in the SQFI assessment database.

Where the scope change is a new process or a major change to an existing process, a new product line, or a significant change in personnel or raw materials, the certification body shall be advised in writing

Where the request is received within thirty (30) days prior to the re-certification audit window, the certification body may defer the scope extension to the next re-certification audit and shall advise the site. No new certificate shall be issued until after a successful re-certification audit.

5.2 Changing the Certification Body

A site can change its certification body after one certification cycle and only when there has been closure of all outstanding non-conformities, provided that the certification is not suspended or under threat of suspension or withdrawal.

Sites that require a surveillance audit are permitted to change certification bodies only after the surveillance audit is conducted or by written approval from the SQF Compliance Manager

When a site changes certification bodies, the certificate issued by the previous certification body remains valid until the expected expiration date.

The certification number and re-certification date are transferred with the site to the new certification body.

The new certification body shall undertake a pre-transfer review of the site's certification to:

i. Confirm the certificate is current, valid and relates to the SQF System so certified;

ii. Confirm the site's food sector category falls within the new certification body's scope of accreditation;

iii. Confirm any complaints received are actioned;

iv. Review the site's audit history (where the site can demonstrate such history to the satisfaction of the new certification body by way of copies of audit reports completed by any previous certification body) and the impact of any outstanding non-conformities;

v. Confirm the stage of the current certification cycle.

When a site changes their certification body, the site shall make the last re-certification audit report and surveillance audit report (where applicable) available to the new certification body.

5.3 Notification of Product Recalls and Regulatory Infringements

Upon identification that a certified site initiates a food safety event that requires public notification (such as Class l or Class ll recall, or the receipt of a regulatory warning letter), the site shall notify the certification body and the SQFI in writing at foodsafetycrisis@sqfi.com within twenty-four (24) hours of the event.

The site's certification body and the SQFI shall be listed in the site's essential contacts lists as defined in system element 2.6.3 of the SQF Food Safety Code for Manufacture of Food Packaging.

The certification body shall notify the SQFI within a further forty-eight (48) hours of any action they intend to take to ensure the integrity of the certification.

5.4 Compliance and Integrity Program

To meet the requirements of SQFI's Compliance and Integrity Program, SQFI may from time to time monitor the activities of the certification bodies and their auditors. These monitoring techniques include, but are not limited to validation audits and/or witness audits. While conducting these additional monitoring activities, sites shall be required to allow additional SQFI-authorized representatives, staff or auditors into their site during the audit or after the audit has taken place. The attendance of an SQFI representative shall not interfere with operations, or result in additional audit time or non-conformities, and will not increase the cost charged by the certification body for the audit.

5.5 Change of Ownership

When a certified site's business has been sold and the business name is retained, the new owner shall, within thirty (30) calendar days of the change of ownership, notify the certification body and apply to retain the SQF certification and the existing certification number. In cases where the ownership of a certified site changes, but the staff with major responsibility for the management and oversight of the SQF food safety System has been retained, the certification body may retain the existing audit frequency status. In making this application, the certification body shall determine that staff with major responsibility for the management and oversight of the SQF System has been retained.

If there are significant changes in site management and personnel, the certification body shall complete a certification audit and issue a new certificate and a new certification number. The audit frequency applicable to a new certification shall apply.

5.6 Relocation of Premises

When a certified site relocates their business premises, the site's certification does not transfer to the new site. A successful certification of the new premises must be conducted. Although the site's certificate number shall remain the same, an initial certification audit of the new premise shall apply, i.e. a desk audit and site audit.

5.7 Use of a Technical Expert

Technical experts may be used to assist SQF food safety auditors in audits where the auditor is SQF registered but does not possess some or any site's food sector category.

The use of a technical expert to assist an SQF food safety auditor in the performance of an SQF audit is permitted provided the site has been notified before the audit and accepts their participation. The technical expert must sign a confidentiality agreement with the certification body.

Before the audit, the certification body must submit the technical qualifications of the technical expert and the justification for use of the technical expert to the SQF Compliance Manager.

Technical experts must:

- Hold a degree or higher certificate in packaging technology and a relevant certificate recognized by the SQF in food technology, food hygiene or related science subject OR a primary qualification in food technology, food safety/ hygiene or related science subject and a certificate in packaging technology that is recognized by SQF.
- Have received HACCP training with certificate of attainment issued;
- Have a minimum 5 years industry experience and include two (2)-year experience in packaging manufacture (plastics, paper and board, metal, or glass) within their five (5) years.

Technical experts are to be physically present during the site audit.

5.8 Language

The certification body shall ensure that the SQF food safety auditor conducting the audit can competently communicate in the oral and written language of the site being audited.

In circumstances where a translator is required, the translator shall be provided by the certification body and shall have knowledge of the technical terms used during the audit; be independent of the site being audited and have no conflict of interest. The site shall be notified of any increase in audit duration and cost associated with the use of a translator.

For the purpose of resolving a conflict, the English version of the SQF Food Safety Code for Manufacture of Food Packaging shall be the deciding reference.

5.9 Conflict of Interest

The certification body shall ensure that all certification activities are separately controlled and managed (including the development of policy and practices) from any consulting activity. It shall preclude any prospective SQF food safety auditor from undertaking any audit in relation to the certification of SQF System that constitute a conflict of interest as outlined below or any other condition that could lead to a conflict of interest.

SQF food safety auditors shall not audit anywhere they have participated in a consulting role involving the site in question, or anybody related to the site, within the last two (2) years (considered to be participating in an active and creative manner in the development of the SQF System to be audited, including the development of food safety plans). Consulting includes, but is not limited to, activities such as:

i. Producing or preparing food safety plans, manuals, handbooks or procedures;

ii. Participating in the decision making process regarding SQF System;

iii. Giving advice – as a consultant or otherwise – toward the design, documentation, development, validation, verification, implementation or maintenance of SQF System; and

iv. Deliver or participate in the delivery of an "in-house" food safety training service at which advice and instruction on the development and implementation of food safety plans and SQF System for eventual certification is provided.

The certification body shall ensure that an SQF food safety auditor discloses any existing, former or proposed link between themselves or their organization and the site.

The certification body shall ensure through organizational structure that no potential conflict of interest, consulting, or training occurs from auditors contracted or employed by the certification body to existing or potential site within the SQF program.

A site can refuse the service of an SQF food safety auditor when they consider the auditor has a conflict of interest, or for other reasons. In such circumstances, the site shall outline the reasons in writing to the certification body.

5.10 Complaints, Appeals and Disputes

The certification body shall document, and provide to the site, its procedure for handling and resolving appeals, complaints and disputes made by a site, or made by another party about a site.

When a site has cause to register a complaint about a certification body's activities, or appeals or disputes a decision made by a certification body, including the activities and decisions of its auditors, the certification body shall investigate and resolve these matters without delay and keep a record of all complaints, appeals and disputes and their resolution.

When a certification body receives a complaint about a site from other parties, the certification body is required to investigate and resolve the matter without delay and keep a record of all complaints, appeals and disputes and their resolution.

Appeals regarding decisions on the suspension and/or withdrawal of the SQF certification by a certification body shall not delay the decision to suspend or withdraw the certification.

When upon investigation of a complaint it is determined that there has been a substantiated breakdown of a site's SQF System or any other condition not in accordance with the SQF Food Safety Code for Manufacture of Food Packaging and/or other supporting documents, the certification body shall suspend certification as outlined in Part A, 4.8.

Where a complaint is registered about the conduct or behavior of an auditor or certification body personnel, the certification body shall investigate and resolve the complaint without delay and keep a record of all complaints and their resolution.

Records of complaints made to certification bodies and their investigations shall be available to the SQFI upon request. Where a complaint, appeal or dispute cannot be satisfactorily resolved between the site and the certification body, the matter shall be referred to the SQFI complaints and appeals procedure via the SQF website

(sqfi.com). Complaints and comments about the SQF Code, the SQF assessment database, SQF training centers and consultants can also be registered at this address.

Part B: The SQF Food Safety Code for Manufacture of Food Packaging

Part B is the auditable standard for the SQF Food Safety Code for Manufacturing. It comprises the SQF System Elements for Manufacture of Food Packaging, and the relevant Good Manufacturing module for the applicable food sector category (refer Part A, 1.2).

Scope, References and Definitions

Scope

SQF System Elements for Manufacture of Food Packaging: The System Elements identify the food safety system elements for SQF sites whose primary function is the manufacture of food packaging. (food sector category 27).

Module 27: The individual module describes the Good Manufacturing Practices (GMP) requirements applicable to the manufacture of food packaging. The site must meet the requirements of the module applicable to their food industry sector.

References

The SQF Food Safety Code for Manufacture of Food Packaging refers to the current edition of the CODEX Alimentarius Commission Guidelines for the Application of the Hazard Analysis.

Definitions

For the purpose of this Code, the definitions outlined in *Appendix 2: Glossary* apply.

SQF System Elements Manufacture of Food Packaging

2.1 Management Commitment

2.1.1 Food Safety Policy (Mandatory)

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

i. The site's commitment to supply food safe packaging product;

ii. Methods used to comply with its customer and regulatory requirements and continually improve the safety of the food packaging manufacturer management system; and

iii. The site's commitment to establish and review packaging food safety objectives.

2.1.1.2 The policy statement shall be:

i. Signed by senior site management;

ii. Made available in language understood by all staff;

iii. Displayed in a prominent position; and

iv. Effectively communicated to all staff.

2.1.2 Management Responsibility (Mandatory)

2.1.2.1 The reporting structure describing those who have responsibility ensuring food safety of the packaging product shall be identified and communicated within the site.

2.1.2.2 The senior site management shall make provision to ensure food safety packaging practices and all applicable requirements of the SQF System are adopted and maintained in the manufacture of food packaging.

2.1.2.3 The senior site management shall ensure adequate resources are available to achieve food safety objectives and support the development, implementation, maintenance and ongoing improvement of the SQF System.

2.1.2.4 Senior site management shall designate an SQF practitioner for each site with responsibility and authority to:

i. Oversee the development, implementation, review and maintenance of the SQF System, including Good Manufacturing Practices outlined in 2.4.2, and the packaging food safety plan outlined in 2.4.3.

ii. Take appropriate action to ensure the integrity of the SQF System; and

iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

2.1.2.5 The SQF practitioner shall:

i. Be employed by the site as a company employee on a full-time basis;

ii. Hold a position of responsibility in relation to the management of the site's SQF System;

iii. Have completed a HACCP training course that meets the definition found in the SQF Code;

iv. Be competent to implement and maintain HACCP based risk management plans; and

v. Have an understanding of the SQF Food Safety Code for Manufacture of Food Packaging and the requirements to implement and maintain SQF System relevant to food sector category 27.

2.1.2.6 Senior site management shall ensure the training needs of the site are resourced, implemented and meet the requirements outlined in system elements, 2.9, and that site personnel have met the required competencies to carry out those functions affecting the legality and safety of the manufacture of food packaging.

2.1.2.7 Senior site management shall ensure that all staff is informed of their food safety and regulatory responsibilities with regard to the manufacture of food packaging, are aware of their role in meeting the requirements of the SQF Food Safety Code for Manufacture of Food Packaging, and are informed of their responsibility to report food safety problems to personnel with authority to initiate action.

2.1.2.8 Job descriptions for those responsible for food safety shall be documented and include provision to cover for the absence of key personnel.

2.1.2.9 Senior site management shall establish processes to improve the effectiveness of the SQF System to demonstrate continuous improvement.

2.1.2.10 Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

2.1.2.11 Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed upon unannounced audit.

2.1.3 Management Review (Mandatory)

2.1.3.1 The senior site management shall be responsible for reviewing the SQF System and documenting the review procedure. Reviews shall include:

i. The policy manual;

ii. Internal and external audit findings;

iii. Corrective actions and their investigations and resolution;

iv. Customer complaints and their resolution and investigation;

v. Hazard and risk management system;

vi. Follow-up action items from previous management review.

2.1.3.2 The SQF practitioner (s) shall update senior site management on a (minimum) monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. The SQF System in its entirety shall be reviewed at least annually.

2.1.3.3 The Packaging Food Safety Plans, Good Manufacturing Practices and other aspects of the SQF System shall be reviewed and updated as needed when any changes implemented have an impact on the site's ability to manufacture safe food packaging.

2.1.3.5 Records of all reviews, reasons for amending documents, validations and changes to the SQF System shall be maintained.

2.1.4 Complaint Management (Mandatory)

2.1.4.1 The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities, arising from products manufactured or handled on site, shall be documented and implemented.

2.1.4.2 Trends of customer complaint data shall be investigated and analyzed by personnel knowledgeable about the incidents.

2.1.4.3 Corrective action shall be implemented based on the seriousness of the incident and as outlined in 2.5.5.

2.1.4.4 Records of customer complaints and their investigations shall be maintained.

2.1.5 Crisis Management Planning

2.1.5.1 A crisis management plan that is based on the understanding of known potential dangers (e.g. flood, drought, fire, tsunami, or other severe weather or regional events such as warfare or civil unrest) that can impact the site's ability to manufacturer and deliver safe food packaging, shall be documented by senior site management outlining the methods and responsibility the site shall implement to cope with such a business crisis.

2.1.5.2 The crisis management plan shall include as a minimum:

i. A senior site manager responsible for decision making, oversight and initiating actions arising from a crisis management incident;

ii. The nomination and training of a crisis management team;

iii. The controls implemented to ensure a response does not compromise product safety;

iv. The measures to isolate and identify product affected by a response to a crisis;

v. The measures taken to verify the acceptability of packaging prior to release;

vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;

vii. Sources of legal and expert advice; and

viii. The responsibility for internal communications and communicating with authorities, external organizations and media.

2.1.5.3 The crisis management plan shall be reviewed, tested and verified at least annually.

2.1.5.4 Records of reviews of the crisis management plan shall be maintained.

2.2 Document Control and Records

2.2.1 Food Safety Management System (Mandatory)

2.2.1.1 A food safety management system shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the site will use to meet the requirements of the SQF Food Safety Code for Manufacture of Food Packaging, be made available to relevant staff and include:

i. The site's food safety policies and the methods it will apply to meet the requirements of this standard;

ii. The food safety policy statement and organization chart;

iii. The scope of the certification;

iv. A list of the products covered under the scope of certification;

v. Food safety procedures, pre-requisite programs, HACCP-based food safety plans; and

vi. Other documentation necessary to support the development and the implementation, maintenance and control of the SQF System.

2.2.1.2 All changes made to the food safety plans, Good Manufacturing Practices and other aspects of the SQF System shall be validated or justified.

2.2.2 Document Control (Mandatory)

2.2.2.1 The methods and responsibility for maintaining document control and ensuring staff have access to current documents shall be documented and implemented.

2.2.2.2 A register of current SQF System documents and amendments to documents shall be maintained.

2.2.2.3 Documents shall be securely stored and readily accessible.

2.2.3 Records (Mandatory)

2.2.3.1 The methods and responsibility for undertaking monitoring activities, verifying, maintaining and retaining records shall be documented and implemented.

2.2.3.2 All records shall be legible and suitably authorized by those undertaking monitoring activities that demonstrate inspections, analyses and other essential activities have been completed.

2.2.3.3 Records shall be readily accessible, retrievable, securely stored to prevent damage and deterioration and shall be retained in accordance with periods specified by customer, insurance, regulations, or by the organization.

2.3 Specification and Product Development

2.3.1 Product Development and Realization

2.3.1.1 The methods and responsibility for designing, developing and converting product concepts to commercial realization shall be documented and implemented.

2.3.1.2 Product designs, manufacturing processes and the fulfillment of product requirements shall be validated by site trials and product testing.

2.3.1.3 Packaging used to provide a functional effect on food (i.e., shelf life extension) shall, where known, have specified criteria and be referenced in the food safety plan (2.4.3).

2.3.1.4 Trials where necessary shall be conducted to establish and validate a product's:

i. Handling, storage requirements; and

ii. Customer specification including the intended use of the product.

2.3.1.5 A food safety plan shall be validated and verified for each new product and its associated process through conversion to commercial production and distribution, or where a change to materials, process, or unitizing occurs that may impact the safety of the product.

2.3.1.6 Records of all product design, process development, approvals and records of validated storage conditions shall be maintained.

2.3.1.7 Where applicable, the site shall have a procedure for certification and approval of artwork for primary or secondary packaging used in print processes. The controls shall also describe how print run samples are approved by customers, color standards are developed and changes to artwork is managed.

2.3.2 Raw and Packaging Materials

2.3.2.1 Specifications for all raw materials, including, but not limited to additives, hazardous chemicals and processing aids that impact food safety of the product shall be documented and kept current.

2.3.2.2 Product labels shall be accurate, comply with the relevant legislation and be approved by qualified company personnel. Packaging with product ingredient lists(s), allergens, identification codes, etc., shall be managed in a manner that prevents misprinting.

2.3.2.3 All raw materials shall comply with the relevant legislation in the country of manufacture and country of destination, if known.

2.3.2.4 The methods and responsibility for developing and approving detailed raw material and packaging specifications shall be documented.

2.3.2.5 Raw materials shall be verified to ensure food safety is not compromised and the material is fit for its intended purpose. Verification of raw materials shall include certificates of conformance; or certificate of analysis; letter of guarantee or sampling and testing.

2.3.2.6 A register of current raw and finished food packaging product specifications shall be maintained.

2.3.3 Contract Service Providers

2.3.3.1 Specifications for contract services that have an impact on the safety of the food packaging product shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of all contract personnel.

2.3.3.2 A register of all contract service specifications shall be maintained.

2.3.4 Contract Manufacturers

2.3.4.1 The methods and responsibility for ensuring all agreements relating to food safety and customer packaging requirements and its realization and delivery are specified and agreed shall be documented and implemented.

2.3.4.2 The site shall:

i. Verify compliance with the SQF Food Safety Code for Manufacture of Food Packaging and that all customer requirements are being met at all times.

ii. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel.

2.3.4.3 Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.

2.3.5 Finished Product Specifications

2.3.5.1 Finished product specifications shall be documented, current, approved by the site and their customer, accessible to relevant staff and may include:

i. Physical and chemical characteristics;

ii. Microbiological, where appropriate;

iii. Artwork and unitizing requirements; and

iv. Confirmation that the packaging product is suitable for the intended use of the customer.

v. Product ingredient lists(s), allergens, identification codes, etc.,

2.3.5.2 A register of finished product specifications shall be maintained.

2.4 Food Safety System for Manufacture of Food Packaging

2.4.1 Food Legislation (Mandatory)

2.4.1.1 The site shall ensure that, at the time of delivery to its customer, the product supplied shall comply with the legislation that applies to the packaging and its manufacture in the country of use or sale. This includes compliance with legislative requirements applicable to food safety, packaging, product description, any other criteria listed under food safety legislation, and to relevant established industry codes of practice.

2.4.1.2 The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging issues, and relevant industry codes of practice shall be documented and implemented.

2.4.1.3 SQFI and the certification body shall be notified in writing within twenty-four (24) hours in the event of a regulatory warning. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

2.4.2 Good Manufacturing Practices (Mandatory)

2.4.2.1 The site shall ensure the Good Manufacturing Practices described in module 13 of the Food Safety Code for Manufacture of Food Packaging are applied, or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

2.4.2.2 Those Good Manufacturing Practices applicable to the scope of certification that outline the means by which food safety is controlled and assured shall be documented and implemented.

2.4.3 Food Safety Plan (Mandatory)

2.4.3.1 A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines.

2.4.3.2 The food safety plan shall be effectively implemented and maintained and outline the means by which the site controls and assures the manufacture of safe packaging product and included in the scope of the SQF certification and their associated manufacturing processes. More than one HACCP food safety plan may be required to cover all packaging included in the scope of certification.

2.4.3.3 The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant products and associated processes. Where the relevant expertise is not available on site, advice may be obtained from other sources to assist the food safety team.

2.4.3.4 The scope of each food safety plan shall be developed and documented including the start and end-point of the manufacturing under consideration and all relevant inputs and outputs.

2.4.3.5 Product descriptions shall be developed and documented for all packaging included in the scope of the food safety plans. This shall reference the finished product specifications (refer to 2.3.5.1) plus any additional information relevant to product safety, such as WVTR, gas permeability.

2.4.3.6 The intended use of each product shall be determined and documented by the food safety team. This shall include requirements for further processing if applicable, and potential alternative use of the product.

2.4.3.7 The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw material and service inputs (water, steam, gasses as appropriate), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation.

2.4.3.8 The food safety team shall identify and document all packaging safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

2.4.3.9 The food safety team shall conduct a hazard analysis for every identified hazard, to identify which hazards are significant, i.e. their elimination or reduction to an acceptable level is necessary to ensure food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.

2.4.3.10 The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.

2.4.3.11 Based on the results of the hazard analysis (refer to 2.4.3.9), the food safety team shall identify the steps in the manufacturing process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.

2.4.3.12 For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated level of control of the identified safety hazard(s); and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1).

2.4.3.13 The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.

2.4.3.14 The food safety team shall develop and document deviation procedures that identify the disposition of affected packaging material when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.

2.4.3.15 The documented and approved food safety plan (s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs or other occur which impact the safety of the product.

2.4.3.16 Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5)

2.4.3.17 Where applicable regulations in the country of production and destination (if known) prescribe a food food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and applicable regulatory requirements.

2.4.4 Approved Supplier Program (Mandatory)

2.4.4.1 Raw materials and services that impact finished product safety shall meet the agreed specification (2.3.2) and be supplied by an approved supplier.

2.4.4.2 The receipt of raw materials received from non-approved suppliers shall be acceptable only in an emergency situation and provided they are inspected or analyzed before use.

2.4.4.3 The responsibility and procedure for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented.

2.4.4.4 The site's food defense plan (refer to 2.7.1.1) shall include measures to secure incoming materials and protect them from deliberate act of sabotage or terrorist-like incidents.

2.4.4.5 The site's food fraud vulnerability assessment (refer to 2.7.2.1) shall include the site's susceptibility to raw material substitution, mislabeling, and counterfeiting which may adversely impact food packaging safety.

2.4.4.6 The food fraud mitigation plan (refer to 2.7.2.2) shall include methods by which the identified food packaging safety vulnerabilities from materials shall be controlled.

2.4.4.7 Raw materials received from other facilities under the same corporate ownership, shall be subject to the same specification requirements (refer to 2.3.2) and approved supplier requirements as all other material providers.

2.4.4.8 The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials, services supplied, and shall contain as a minimum:

i. Agreed specifications (refer to 2.3.2);
ii. Reference to the rating of the level of risk applied to the raw material ingredients or services and the approved supplier;
iii. A summary of the food safety controls implemented by the approved supplier;
iv. Methods for granting approved supplier status;
v. Methods and frequency of monitoring approved suppliers;
vi. Details of the certificates of conformance if required; and
vii. Methods and frequency of reviewing approved supplier performance and status.

2.4.4.9 Supplier audits shall be based on risk and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements risk and trained in auditing techniques.

2.4.4.10 A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained.

2.4.5 Non-conforming Product or Equipment

2.4.5.1 The responsibility and methods outlining how non-conforming raw material, work-in-progress, finished product or equipment detected during receipt, storage, manufacturing, or delivery is handled shall be documented and implemented. The methods applied shall ensure:

i. Non-conforming product is quarantined, identified, handled and disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and
ii. Non-conforming equipment is effectively repaired or disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of the finished product ; and
iii. All relevant staff is aware of the organization’s quarantine and release requirements applicable to equipment or product placed under quarantine status.

2.4.5.2 Food packaging product returned from a customer shall be quarantined until authorized for release for use or re-shipment.

2.4.5.3 Quarantine records, and records of the handling, corrective action, or disposal of non-conforming product or equipment shall be maintained.

2.4.6 Product Rework

2.4.6.1 The responsibility and methods outlining how raw materials or food packaging product are reworked shall be documented and implemented and processed in a manner that does not contaminate raw materials or food packaging . The methods applied shall ensure:

i. Reworking operations are supervised by qualified personnel;

ii. Reworked product is clearly identified and traceable;

iii. Each lot of reworked product is inspected or analyzed as required before release;

iv. Inspections and analyses shall conform to the requirements outlined in element 2.5.6; and

v. Release of reworked product shall conform to element 2.4.7.

2.4.6.2 Food packaging manufactured with post-consumer recycled materials shall conform to the applicable regulatory requirements.

2.4.6.3 Food Packaging that contains printed information shall be handled in a manner that prevents mixed up or intermingled product.

2.4.6.3 Records of all reworking operations shall be maintained.

2.4.7 Product Release (Mandatory)

2.4.7.1 The responsibility and methods for releasing finished packaging product shall be documented and implemented. The methods applied shall ensure the food packaging is released:

i. By authorized personnel; and

ii. Once all inspections and analyses are successfully completed and documented to verify legislative and other established food packaging safety controls have been met.

2.4.7.2 Records of release of finished food packaging shall be maintained.

2.4.8 Environmental Monitoring

2.4.8.1 A risk-based environmental monitoring program, for known or expected concerns, shall be in place for all processes in the manufacture of food packaging.

2.4.8.2 The responsibility and methods for the environmental monitoring program shall be documented and implemented.

2.4.8.3 An environmental sampling and testing schedule, appropriate to the nature of the product, shall be prepared, detailing any applicable pathogen (s), (i.e., *Bacillus* spp. in paper or paper products), the number of samples to be taken, and the frequency of sampling.

2.4.8.4 Environmental testing results shall be monitored and corrective actions (refer to 2.5.3.1) implemented where unsatisfactory trends are observed.

2.5 SQF System Verification

2.5.1 Validation and Effectiveness (Mandatory)

2.5.1.1 The methods, responsibility and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall ensure that:

i. Good Manufacturing Practices are confirmed to ensure they achieve the required result;

ii. Critical packaging food safety limits are validated, and re-validated annually;

iii. Changes to the manufacturing processes or procedures are assessed to ensure controls are still effective; and

2.5.1.2 Records of all validation activities shall be maintained.

2.5.2 Verification Activities (Mandatory)

2.5.2.1 A verification schedule outlining the verification activities, their frequency of completion and the person responsible for each activity shall be prepared and implemented.

2.5.2.2 The methods, responsibility and criteria for verifying monitoring of Good Manufacturing Practices, critical control points and other food safety controls, and the legality of SQF certified products, shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

2.5.2.3 Records of the verification of monitoring activities shall be maintained.

2.5.3 Corrective and Preventative Action (Mandatory)

2.5.3.1 The responsibility and methods outlining how corrections and corrective actions are determined, implemented and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits, and deviations from food safety requirements, shall be documented and implemented.

2.5.3.2 Records of all investigation and resolution of non-conformities including their corrections and corrective action shall be maintained.

2.5.4 Product Sampling, Inspection and Analysis

2.5.4.1 The methods, responsibility and criteria for sampling, inspecting and/or analyzing raw materials, finished food packaging and work in progress shall be documented and implemented. The methods applied shall ensure:

i. Inspections and analyses are completed at regular intervals as required and to agreed specification and legal requirements, if any;

ii. Inspections are conducted to ensure raw materials, work in progress and finished product comply with the relevant specification, regulatory requirement, if any; and

iii. All analyses are conducted to industry recognized methods or alternative methods which are validated as equivalent to the industry recognized methods.

2.5.4.2 On-site personnel that conduct testing of finished product shall participate in an applicable proficiency testing program at least annually to ensure accuracy of results.

2.5.4.3 Where external laboratories are utilized to conduct input or product analysis, the laboratories shall be accredited to ISO 17025 or an equivalent national standard, and shall be included on the site's contract service specifications register (refer to 2.3.3.1).

2.5.4.4 Where applicable, procedures shall also be in place for managing and verifying correct printing plates, anilox rollers, cylinders are used during printing.

2.5.4.5 Where required, procedures shall be in place for effective storage of printing plates, cylinders and print blankets. Procedures for identifying print errors shall be documented and implemented.

2.5.4.6 Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked or other printed food packaging product. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.

2.5.4.7 Product obtained for sampling and/or inspection shall be properly destroyed to prevent re-entry into the production process or sale to the customer.

2.5.4.8 Records of all inspections and analyses shall be maintained.

2.5.5 Internal Audits and Inspections (Mandatory)

2.5.5.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted at least annually. The methods applied shall ensure:

i. All applicable requirements of the SQF Food Safety Code for Manufacture of Food Packaging are assessed as per the SQF audit checklist or similar tool;

ii. Correction and corrective action of deficiencies identified during the internal audits are undertaken;

iii. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions.

2.5.5.2 Staff conducting internal audits shall be trained and competent in internal audit procedures.

2.5.5.3 Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and building/equipment maintenance is compliant to the SQF Food Safety Code for Manufacture of Food Packaging. The site shall:

i. Take corrections or corrective and preventative action; and

ii. Maintain records of inspections and any corrective action taken.

2.5.5.4 Where practical staff conducting internal audits shall be independent of the function being audited.

2.5.5.5 Records of internal audits and inspections and any corrections and corrective action taken as a result of internal audits shall be maintained.

2.6 Product Identification, Trace, Withdrawal and Recall

2.6.1 Product Identification (Mandatory)

2.6.1.1 The methods and responsibility for identifying raw materials, work-in progress, recycled material, plant based material, functional additives, or process inputs and finished product during all stages of production and storage shall be documented and implemented. The identification system shall be implemented to ensure:

i. Raw materials, work-in progress, process inputs, recycled materials, and finished product are clearly identified during all stages of receipt, production, storage and dispatch; and

ii. Finished product is labeled to the customer specification, where applicable.

2.6.1.2 Product identification records shall be maintained.

2.6.1.3 Start up and changeover procedures during manufacture of food packaging shall be documented and implemented to ensure that the correct product information is on the label, and that the changeover is inspected and approved by an authorized person.

2.6.2 Product Traceability (Mandatory)

2.6.2.1 The responsibility and methods used to trace packaging shall be documented and implemented to ensure:

i. Finished product is traceable to the customer (one up) and provides traceability through the process to the manufacturing site and date of receipt of raw materials(one back);

ii. Traceability is maintained where packaging is reworked; and

iii. The effectiveness of the product trace system shall be reviewed at least annually as part of the product recall and withdrawal review (refer to 2.6.3.3).

2.6.2.2 Records of raw material receipt and use, and finished product dispatch and destination shall be maintained.

2.6.3 Product Withdrawal and Recall (Mandatory)

2.6.3.1 The responsibility and methods used for assisting customers in case of product recalls where the packaging is implicated as the source of contamination shall be documented and implemented. The procedure shall:

i. Identify those responsible for coordinating, managing and investigating a product withdrawal or recall with customers;

ii. Describe the procedures to be implemented by site management, including sources of legal, regulatory, and expert advice;

iii. Outline a communication plan to inform customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident; and

SQFI, the certification body, and the appropriate regulatory authority shall be listed as an essential body and notified in instances of a food safety incident of a public nature, or product recall for any reason.

2.6.3.2 Investigation shall be undertaken to determine the root cause of a withdrawal, mock recall or recall and details of investigations and any action taken shall be documented.

2.6.3.3 The withdrawal and recall system shall be reviewed, tested and verified as effective at least annually. Testing shall include incoming materials (one back) and finished product (one up).

2.6.3.4 SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food packaging safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

2.6.3.5 Records of all withdrawals, recalls and mock recalls shall be maintained.

2.7 Food Defense and Food Fraud

2.7.1 Food Defense Plan (Mandatory)

2.7.1.1 The methods, responsibility and criteria for preventing adulteration of product caused by a deliberate act of sabotage or terrorist-like incident shall be documented, implemented and maintained.

2.7.1.2 A food defense plan shall include:

i. The name of the senior site management person responsible for food defense;

ii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing and storage areas through designated access points;

iii. The methods implemented to protect sensitive processing points from intentional adulteration;

iv. The measures taken to ensure the secure receipt and storage of raw materials, packaging, equipment and hazardous chemicals;

v. The measures implemented to ensure raw materials, work-in progress, process inputs and finished product are held under secure storage and transportation conditions; and

vi. The methods implemented to record and control access to the premises by employees, contractors, and visitors.

2.7.1.3 The food defense plan shall be reviewed and challenged at least annually.

2.7.1.4 Records of reviews of the food defense plan shall be maintained.

2.7.2 Food Fraud

2.7.2.1 The methods, responsibility and criteria for identifying the site's vulnerability to food fraud shall be documented, implemented and maintained. The food fraud vulnerability assessment shall include the site's susceptibility to product substitution, mislabeling and counterfeiting which may adversely impact the food safety of packaging product.

2.7.2.2 A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities shall be controlled.

2.7.2.3 The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually.

2.7.2.4 Records of reviews of the food fraud vulnerability assessment and mitigation plan shall be maintained.

2.8 Allergen Management

2.8.1 Allergen Management (Mandatory)

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating packaging shall be documented and implemented. The allergen management program shall include:

i. A risk analysis of those raw materials, printed packaging, or processing aids, including food grade lubricants, that may contain food allergens or food allergen statements;

ii. An assessment of workplace-related food allergens from locker rooms, vending machines, lunch rooms, visitors;

iii. A register of allergens which is applicable in the country of manufacture and the country(ies) of destination if known;

iv. A list of allergens which is accessible by relevant staff;

v. The hazards associated with allergens and their control incorporated into the food safety plan;

vi. A management plan for control of identified allergens;

vii. Cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces; and

viii. Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be effectively implemented.

2.8.1.2 Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in progress, and rework or finished production how to identify, handle, store and segregate raw materials containing allergens.

2.8.1.3 Sites that do not handle allergenic materials shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introducing unintended allergens through supplier, contract manufacturer, employee, and visitor activities.

2.9 Training

2.9.1 Training Requirements

2.9.1.1 The responsibility for establishing and implementing the training needs of the site's personnel to ensure they have the required competencies to carry out functions affecting manufacture of food safe packaging , regulatory compliance, and food safety shall be defined and documented.

2.9.1.2 Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

2.9.2 Training Program (Mandatory)

2.9.2.1 An employee training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with:

i. Developing and applying Good Manufacturing Practices;

ii. Applying food regulatory requirements;

iii. Steps identified by the hazard analysis and/or other instructions as critical to effective implementation of the food safety plan and the maintenance of food safety; and

iv. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF System.

2.9.3 Instructions

2.9.3.1 Instructions shall be available in the languages relevant to the staff, explaining how all tasks critical to meeting regulatory compliance, the maintenance of food safety and process efficiency are to be performed.

2.9.4 HACCP Training Requirements

2.9.4.1 HACCP training shall be provided for staff involved in developing and maintaining food safety plans.

2.9.5 Language

2.9.5.1 Training materials and the delivery of training shall be provided in language understood by staff.

2.9.6 Refresher Training

2.9.6.1 The training program shall include provision for identifying and implementing the refresher training needs of the organization.

2.9.7 Training Skills Register

2.9.7.1 A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the:

i. Participant name;

ii. Skills description;

iii. Description of the training provided;

iv. Date training completed;

v. Trainer or training provider; and

vi. Supervisor’s verification the training was completed and that the trainee is competent to complete the required tasks.

Module 13: Food Safety Fundamentals – Good Manufacturing Practices for Production of Food Packaging (GFSI Scope M)

This module covers the Good Manufacturing Practices requirements for the manufacture of food packaging.
Sites implementing this module must also meet the requirements of SQF System Elements for the Manufacture of Food Packaging.
Applicable food sector categories (FSCs) are:

FSC 27: Manufacture of Food Packaging

All applicable elements of Module 13 shall be implemented. Where an element is not applicable a request for exemption must be appropriately justified, and submitted to the certification body in writing before the audit.

13.1 Site Location and Construction

13.1.1 Premises Location and Approval

13.1.1.1 The location of the premises shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations.

13.1.1.2 The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

13.2 Construction of Premises and Equipment

13.2.1 Materials and Surfaces

13.2.1.1 In facilities where food contact packaging is manufactured, product contact surfaces shall be constructed of materials that will not contribute to a food safety risk to the manufacture of packaging material.

13.2.2 Floors, Drains and Waste Traps

13.2.2.1 Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned and fit for purpose.

13.2.2.2 Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

13.2.2.3 Waste trap system shall be located sufficiently far away from any food packaging handling area or entrance to the premises so as to prevent contamination.

13.2.3 Walls, Windows, Doors and Ceilings

13.2.3.1 Walls, partitions, ceilings and doors shall be of durable construction and fit for purpose.

13.2.3.2 In packaging manufacturing and storage areas wall to wall and wall to floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of debris.

13.2.3.3 In packaging manufacturing and storage areas doors shall be of solid construction and windows shall be of shatterproof glass or similar material.

13.2.4 Lighting and Light Fittings

13.2.4.1 Lighting in premises where food contact packaging is manufactured shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.

13.2.4.2 Light fittings in such areas shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling.

13.2.4.3 Light fittings in other areas where the product is stored shall be designed such as to prevent product contamination.

13.2.5 Dust, Insect and Pest Proofing

13.2.5.1 All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed and proofed against dust, vermin and other pests.

13.2.5.2 Methods shall be in place to adequately control dust produced by the manufacturing process.

13.2.5.3 Personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device to protect against ingress of dust, vermin and other pests.

13.2.5.4 External personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against ingress of dust, vermin and other pests.

13.2.5.5 Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to packaging, or manufacturing equipment. Poison rodenticide bait shall not be used inside storage areas or manufacturing areas.

13.2.6 Ventilation

13.2.6.1 Adequate ventilation shall be provided in enclosed packaging manufacture and handling areas.

13.2.7 Equipment, Utensils and Protective Clothing

13.2.7.1 Specifications for new equipment and protective clothing, and procedures for purchasing equipment shall be documented and implemented.

13.2.7.2 Equipment and utensils shall be designed, constructed, installed, operated and maintained so as not to pose a contamination threat to the product, and to allow for cleaning beneath and behind it.

13.2.7.3 Where required, protective clothing shall be manufactured from material that is not liable to contaminate food packaging and easily cleaned.

13.2.7.4 When protective clothing is used, hooks racks or other forms of off the floor storage shall be provided for the temporary storage of protective clothing when staff leaves the manufacturing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.

13.2.8 Premises and Equipment Maintenance

13.2.8.1 The methods and responsibility for the maintenance and repair of plant, equipment and buildings shall be documented, planned and carried out implemented in a manner that minimizes the risk of contamination of packaging material or equipment.

13.2.8.2 Routine maintenance of plant and equipment in any packaging material manufacturing, handling or storage area shall be performed according to a maintenance-control schedule and recorded.

The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance of product safety and quality.

13.2.8.3 Failures of plant and equipment shall be documented, reviewed and their repair incorporated into the maintenance control schedule;

13.2.8.4 Maintenance staff and contractors shall comply with the personnel and process hygiene requirements (refer to 13.3.1, 13.3.2, 13.3.3, 13.3.4).

13.2.8.5 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any packaging manufacturing area.

13.2.8.6 The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance pose a potential threat to packaging material safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside manufacturing times.

13.2.8.7 Maintenance staff and contractors shall remove all tools, spare parts, and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed prior to the commencement of manufacturing operations.

13.2.8.8 Temporary repairs, where required shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address final completion of temporary repairs in order to ensure they do not become permanent solutions.

13.2.8.9 Equipment located over raw materials, finished food packaging or product conveyors shall be lubricated with food grade lubricants and their use controlled so as to minimize the contamination of the product. Machinery lubricant controls shall be in place to prevent contamination of food packaging from gear box oils, bearing lubricants, hydraulics or any other source.

13.2.8.10 Paint used in a manufacturing area shall not be peeling or flaking and shall not be used on any product contact surface.

13.2.9 Calibration

13.2.9.1 The methods and responsibility for the calibration and re-calibration of measuring, test and inspection equipment used for monitoring activities outlined in pre-requisite program, packaging safety plans and quality plans and other process controls, or to demonstrate compliance with packaging product specifications shall be documented and implemented. Electronic equipment being used on a daily basis shall be calibrated daily by the users.

13.2.9.2 Procedures shall be documented and implemented to address the disposition of potentially affected food packaging should measuring, test and inspection equipment be found to be out of calibration state.

13.2.9.3 Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment.

13.2.9.4 Equipment shall be calibrated against national or international reference standards and methods or to accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

13.2.9.5 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers recommended schedule.

13.2.9.6 Calibration records shall be maintained.

13.2.10 Pest Prevention

13.2.10.1 The methods and responsibility for pest prevention shall be documented and effectively implemented. The premises, its surrounding areas, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests and vermin.

13.2.10.2 Any identified pest activity shall not present a risk of contamination to raw materials, work-in process, or finished food packaging.

13.2.10.3 Raw materials, work-in-progress or food packaging that is found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation investigated and resolved.

13.2.10.4 The pest prevention program shall:

i. Describe the methods and responsibility for the development, implementation and maintenance of the pest prevention program;
ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications;
iii. Outline the methods used to prevent pest problems;
iv. Outline the pest elimination methods;
v. Outline the frequency with which pest status is to be checked;
vi. Include on a site map the identification, location, number and type of bait stations set;
vii. List the chemicals used (they are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available);
viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station;
ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and
x. Measure the effectiveness of the program to verify the elimination of applicable pests.

13.2.10.5 Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present.

13.2.10.6 Records of all pest control applications shall be maintained.

13.2.10.7 Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 13.6.3 and handled and applied by properly trained personnel. They shall be used by or under the direct supervision of trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food contact packaging.

13.2.10.8 Pest prevention contractors or licensed users shall be:

i. Licensed and approved by the local relevant authority;
ii. Use only trained and qualified operators who comply with regulatory requirements;
iii. Use only approved chemicals;
iv. Provide a pest control management plan (refer to 2.3.3) which will include a site map indicating the location of bait stations and traps;
v. Report to a responsible senior management person on entering the premises and after the completion of inspections or treatments;
vi. Provide a written report of their findings and the inspections and treatments applied and;
vii. Where applicable, unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.

13.2.11 Cleaning and Sanitation

13.2.11.1 The methods and responsibility for the cleaning of manufacturing and storage areas, staff amenities and toilet facilities shall be documented and implemented.

13.2.11.2 Provision shall be made for the effective cleaning of processing equipment.

13.2.11.3 Adjacent production equipment shall be covered or shut down and raw materials and finished goods shall be moved from the vicinity if using compressed air hoses to clean.

13.2.11.4 Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure packaging manufacturing areas, product contact surfaces, equipment, staff amenities and sanitary facilities and other essential areas are clean before the commencement of production. Pre-operational inspections shall be conducted by qualified personnel.

13.2.11.5 Staff amenities, sanitary facilities and other essential areas shall be inspected by qualified personnel to ensure the areas are clean, at a defined frequency.

13.2.11.6 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.

13.2.11.7 Appropriate cleaning agents shall be purchased in accordance to applicable legislation. The site shall ensure:

i. An inventory of all cleaning agents purchased and used shall be maintained;
ii. Cleaning agents are stored as outlined in element 13.6.3;
iii. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and
iv. Only trained staff handles cleaning agents.

13.2.11.8 The site shall dispose of unused cleaning agents and empty containers in accordance with regulatory requirements, where applicable, and ensure that:

i. Empty cleaning agent containers are appropriately cleaned, treated and labeled before use;
ii. Empty cleaning agent containers are labeled, isolated and securely stored while awaiting collection; and
iii. Unused and obsolete cleaning agents are stored under secure conditions while waiting authorized disposal by an approved vendor.

13.3 Personnel Hygiene and Welfare

13.3.1 Personnel

13.3.1.1 Personnel who are known to have or who are known to be carriers of infectious diseases that present a health risk to others through the manufacturing or storage processes shall not engage in the manufacture of food contact packaging, or enter storage areas where food contact packaging is exposed.

13.3.1.2 The site shall have measures in place to prevent contact of materials, food packaging or food packaging contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means.

In the event of an injury which causes spillage of bodily fluid, a properly trained employee shall ensure that all affected areas including handling and manufacturing areas have been adequately cleaned and that all affected materials have been quarantined and disposed of.

13.3.1.3 Personnel with exposed cuts, sores or lesions shall not be engaged in handling raw materials or finished food packaging.

Minor cuts or abrasions on exposed parts of the body shall be covered with a colored bandage containing a metal strip or an alternative suitable waterproof and colored dressing.

13.3.1.4 Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. Drinking of water is permissible only under conditions that prevent contamination or other food safety risks from occurring.

Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, food packaging or equipment.

13.3.2 Hand Washing

13.3.2.1 Hand wash basins shall be provided in appropriate areas.

13.3.2.2 Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with:

i. A potable water supply at an appropriate temperature;
ii. Liquid soap contained within a fixed dispenser;
iii. Paper towels or effective hand dryer; and
iv. A means of containing used paper towels.

13.3.2.3 A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.

13.3.2.4 Personnel shall have clean hands and hands shall be washed by all personnel, including staff, contractors and visitors:

i. On entering production areas;
ii. After each visit to a toilet;
iii. After using a handkerchief;
iv. After smoking, eating or drinking; and
v. After handling waste or chemicals.

13.3.2.5 When gloves are used, personnel shall maintain the hand washing practices outlined above.

13.3.3 Clothing

13.3.3.1 The site shall undertake a risk analysis to ensure that the clothing and hair policy protects food contact packaging from unintentional contamination.

13.3.3.2 Clothing worn by staff engaged in handling food contact packaging shall be maintained, stored, laundered and worn so as not to present a contamination risk to products.

13.3.3.3 Clothing and shoes shall be clean at the commencement of each shift and maintained in a serviceable condition, and changed where they present a product contamination risk.

13.3.3.4 Gloves used when contacting finished packaging material shall be clean and maintained and replaced when needed.

13.3.4 Jewelry and Personal Effects

13.3.4.1 Jewelry and other loose objects shall not be worn or taken into a product handling or any area where packaging material is exposed.

13.3.4.2 The wearing of plain bands with no stones and medical alert bracelets that cannot be removed can be permitted, however the site will need to consider their customer requirements and the applicable food legislation.

13.3.5 Visitors

13.3.5.1 All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any manufacturing or storage areas.

13.3.5.2 Visitors shall enter and exit manufacturing or storage areas through the proper staff entrance points and comply with all personnel practice requirements.

13.3.5.3 All visitors shall be trained in the appropriate site food packaging safety and hygiene procedures before entering into any manufacturing or handling areas or shall be escorted at all times in manufacturing and storage areas.

13.3.6 Staff Amenities

13.3.6.1 If provided, staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and storage of food contact packaging.

13.3.7 Change Rooms

13.3.7.1 Where applicable, facilities shall be provided to enable staff to change into and out of protective clothing as required.

13.3.7.2 Where applicable, provision shall be made for staff to store their street clothing and personal items separate from packaging handling or storage areas.

13.3.8 Sanitary Facilities

13.3.8.1 Toilet rooms shall be:

i. designed and constructed so that they are accessible to staff and separate from any food packaging handling or storage operations;
ii. accessed from the manufacturing area via an airlock vented to the exterior or through an adjoining room;
iii. sufficient in number for the maximum number of staff;
iv. constructed so that they can be easily cleaned and maintained; and
v. Kept clean and tidy.

13.3.8.2 Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations. Procedure shall be documented and implemented to properly manage sewage back-ups in order to minimize the potential for contamination.

13.3.8.3 Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 13.3.2.2.

13.3.9 Lunch Rooms

13.3.9.1 Separate lunch room facilities shall be provided away from packaging manufacturing, handling or storage areas. Lunch rooms shall be kept clean and tidy and free from waste materials and pests.

13.3.9.2 Signage in appropriate languages instructing people to wash their hands before returning to packaging manufacturing and storage areas shall be provided in a prominent position in lunch rooms and at lunch room exits.

13.4 Personnel Processing Practices

13.4.1 Staff Engaged in Manufacture, Handling and Storage of Food Contact Packaging

13.4.1.1 All personnel engaged in any packaging manufacture and storage operations shall comply with the following practices:

i. Personnel entry to production areas shall be through designated access doors only;
ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access for waste removal or receiving of materials is required;
iii. Raw and finished packaging material shall be maintained appropriately and off the floor;
iv. Waste shall be contained in the bins identified for this purpose and removed from the manufacturing area on a regular basis and not left to accumulate.

13.4.1.2 The manufacturing process shall be controlled such that the packaging material produced is food safe and free from contamination. Procedures shall be in place to prevent cross contamination of food contact packaging from raw materials, recycled materials, cleaning agents, or chemicals.

13.4.1.3 All personnel engaged in the manufacture, storage, transport and handling of food packaging shall ensure that products and materials are handled and stored in such a way as to prevent damage or contamination.

13.5 Water and Air Supply

13.5.1 Water Supply

13.5.1.1 Adequate supplies of clean water shall be provided for use during manufacturing operations, and for cleaning the premises and equipment.

13.5.1.2 Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.

13.5.1.3 The delivery of water within the premises shall ensure potable water is not contaminated.

13.5.1.4 The use of non-potable water shall be controlled such that:

i. There is no cross contamination between potable and non-potable water lines;
ii. Non-potable water piping and outlets are clearly identified;
iii. Hoses, taps, or other similar sources of possible contamination shall comply with local, national or international regulatory requirements to prevent back flow or back siphonage.

13.5.2 Monitoring Water Microbiology and Quality

13.5.2.1 Water used for

i. The manufacture of food contact packaging;
ii. Cleaning product contact surfaces;
iii. Hand washing; and
iv. The manufacture of steam that is in contact with food packaging material shall comply with local, national or internationally recognized potable water microbiological and quality standards as required.

13.5.3 Air Quality

13.5.3.1 Where compressed air comes into contact with food packaging or surfaces which contact the food packaging, the following requirements shall be met.

i. Air is filtered using an appropriate filter capable of removing dust, oil, moisture and microorganisms to avoid cross contamination to the packaging material;
ii. A system is in place to monitor the purity of filtered air.

13.5.3.2 Compressed air systems used in the manufacturing process shall be maintained and regularly monitored for purity and completed annually, at minimum.

13.6 Storage and Transport

13.6.1 Storage and Handling of Materials, Food Packaging, and Equipment

13.6.1.1 The site shall document and implement an effective storage plan in place that allows for the safe, hygienic storage of raw materials, food packaging, rework, equipment, and chemicals.

13.6.1.2 The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented. Procedures are in place to ensure that all raw materials, work-in-progress, rework, and finished food packaging are utilized within their designated shelf-life, where applicable

13.6.1.3 Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment.

13.6.1.4 Where goods described in 13.6.2 and 13.6.3 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food packaging safety and quality.

13.6.2 Storage of Food Packaging and Materials

13.6.2.1 Rooms used for the storage of raw materials, finished food packaging and other dry goods shall be constructed to protect the product from contamination and deterioration.

13.6.2.2 Equipment used for the storage of food packaging shall be constructed of impervious materials and designed and located to prevent accumulation of debris and enable cleaning beneath and behind the equipment.

13.6.2.3 Vehicles that transport product shall be maintained so as not to present a food safety hazard.

13.6.3 Use, Storage of Hazardous Chemicals and Toxic Substances

13.6.3.1 Hazardous chemicals and toxic substances, including solvents and agents, with the potential for contamination of food packaging shall be stored and used so as not to present a hazard to staff, packaging, or areas in which the product is handled, stored or transported.

13.6.3.2 The use of hazardous chemicals and toxic substances, including solvents and agents, shall be used according to manufacture recommendations and Safety Data Sheets (SDS).

13.6.4 Loading, Transport and Unloading Practices

13.6.4.1 The practices applied during loading, transport and unloading of raw materials and food contact food packaging shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity. Food packaging shall be loaded, transported and unloaded under conditions suitable to prevent cross contamination.

13.6.5 Loading/Unloading

13.6.5.1 Vehicles (e.g. trucks/vans/containers) used for transporting food packaging material shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose and free from odors or other conditions that may impact negatively on the food packaging .

13.6.5.2 Loading practices shall be designed to minimize unnecessary exposure of the food packaging to conditions detrimental to maintaining its integrity.

13.7 Separation of Function

13.7.1 Process Flow

13.7.1.1 The process flow shall be designed to prevent cross contamination and organized so there is a continuous flow of product through the process.

13.7.1.2 The flow of personnel shall be managed such that the potential for contamination is minimized.

13.7.2 Control of Foreign Matter Contamination

13.7.2.1 The responsibility and methods used to prevent foreign matter contamination of food packaging shall be documented, implemented and communicated to all staff.

13.7.2.2 Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not detached or become damaged or deteriorated.

13.7.2.3 All glass objects or other brittle materials in food packaging handling/contact zones shall be listed in a glass register including details of their location.

13.7.2.4 Containers, equipment and other utensils made of glass, porcelain, ceramics, laboratory glassware or other brittle material (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers or MIG thermometers required under regulation) shall not be permitted in packaging material manufacturing and storage areas.

13.7.2.5 Regular inspections of packaging material manufacturing and storage areas shall be conducted to ensure they are free of glass or similar materials and to update the glass register.

13.7.2.6 Glass instrument dial covers on manufacturing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

13.7.2.7 Wooden pallets and other wooded objects and other wooden objects used in packaging material manufacturing and storage areas shall be dedicated for that purpose, clean, maintained in good order. Their condition is subject to regular inspection.

13.7.2.8 Loose metal or plastic objects on equipment, equipment covers, and overhead structures shall be controlled or tightly fixed so as not to present a hazard to raw materials, work-in-progress or finished food packaging.

13.7.2.9 Sharps of any type (e.g. knives, cutting blades, etc.) shall be monitored and controlled so as to not present a hazard to raw materials, work-in-progress or finished food packaging.

13.7.3 Managing Foreign Matter Contamination Incidents

13.7.3.1 In all cases of foreign matter contamination the affected item shall be isolated, inspected, reworked or disposed of.

13.7.3.2 In circumstances where glass or similar brittle material breakage occurs, the affected area shall be isolated, cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person prior to the commencement of operations.

13.8 Waste Disposal

13.8.1 Dry and Liquid Waste Disposal

13.8.1.1 The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.

13.8.1.2 Waste shall be removed on a regular basis and not build up in packaging material manufacturing, handling or storage areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until such time as external waste collection is undertaken.

13.8.1.3 Trolleys, vehicles waste disposal equipment, collection bins and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin. Exterior collection and storage bins must be covered.

13.8.1.4 Reviews of the effectiveness of waste management will form part of daily hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports.

13.9 Exterior

13.9.1 Grounds and Roadways

13.9.1.1 The grounds and area surrounding the premises shall be maintained to minimize dust and be kept free of waste or accumulated debris so as not to attract pests and vermin.

13.9.1.2 Paths, roadways and loading and unloading areas shall be maintained so as not to present a hazard to the food packaging safety operation of the premises.

13.9.1.3 Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises.

Appendix 1: SQF Food Sector Categories

FSC	Category (Site Scope of Certification)	GFSI Industry Scopes	Applicable SQF Code Modules	Description	Example of Products	Level of Risk
1	**Production, Capture and Harvesting of Livestock and Game Animals:** Free Range Animal Production Intensive Animal Production Dairy farming Game Animals Egg Production	AI: Farming of Animals	System elements Module 5: GAP for farming of animal products	Applies to the capture, transport, holding, intensive animal husbandry and free range farming of animals, but does not include seafood.	Includes: Deer, cattle, goats, sheep, pigs, poultry, ostrich, emu, etc. Cattle, veal, lamb, pigs, poultry, eggs Cattle, sheep and goats Buffalo, wild pigs, emu	Low risk
2	**Not in use**					
3	**Growing and Production of Fresh Produce and Nuts:** Fresh fruit, vegetables and nuts Ready-to-Eat (RTE) Produce and nuts	BI: Farming of Plant Products	System elements Module 7: GAP for farming of plant products	Applies to the production, harvesting, preparation, field packing, transport and controlled temperature storage of fresh whole fruit, vegetables and nuts. Includes all products grown under broad acre and intensive horticulture production system, including orchards, viticulture, and hydroponics production and nursery operations.	All fruit and vegetable and nut varieties including: Tropical and temperate tree fruits, carrots, beets, potatoes, wine grapes Table grapes, strawberries, raspberries, blueberries, all forms of leafy greens, spring mix, tomatoes, peppers, herbs and spices and tomatoes, green onions, baby spinach, lettuce, melons, etc.	Generally low risk. Some products are classified as high risk
4	**Fresh Produce and Nuts Pack house Operations**	D: Pre-processing of Plant Products	System elements Module 10: GMP for pre-processing of plant products	Applies to the cleaning, shelling, packing, sorting, grading, controlled atmosphere temperature storage and transport of fresh and pre-packaged whole unprocessed fruits, vegetables and nuts for retail sale or further processing.	Includes all fruit, vegetable and nut varieties which are packed in pack houses and which may undergo controlled atmosphere storage and transport.	Low risk
5	**Extensive Broad Acre Agriculture Operations**	BII: Farming of Grains and Pulses	System elements Module 8: GAP for farming of grains and pulses	Applies to the production, harvesting, preparation, transport and storage of broad-acre crops including pulses, cereal and other grains. Also includes growing and harvesting of animal feed crops.	All grain and cereal varieties for human consumption and animal feed including but not limited to wheat, oats, pulse crops, soy, legumes, maize, corn, cotton, pasture, silage and hay.	Generally low risk, although some products and processes are classified as high risk.

FSC	Category (Site Scope of Certification)	GFSI Industry Scopes	Applicable SQF Code Modules	Description	Example of Products	Level of Risk
6	**Harvest and Intensive Farming of Seafood** Wild Caught Fish Aquaculture and RTE seafood.	All: Farming of Fish and Seafood	System elements Module 6: GAP for farming of seafood	Applies to the harvest and wild capture and intensive farming of freshwater and marine fishes and shellfish, including purification, transport and storage and extends to gilling, gutting, shucking and chilling operations at sea.	All fresh and salt water fish and shellfish species including: Tuna, salmon, snapper, bass, catfish and other fish spp. Oysters, mussels, shrimp, lobster, crab, and other shellfish spp.	Generally low risk, although some products and processes are classified as high risk.
7	**Slaughterhouse, Boning and Butchery Operations:** Red Meat Poultry Meat	C: pre-process handling of animal products	System elements Module 9: GMP for pre-processing of animal products	Applies to the slaughtering, dressing, processing, transport, storage, chilling, freezing and wholesaling of all animal species and game animals for consumption and extends to all meat cuts.	Includes uncooked poultry, pork and red meat animal species prepared in retail butcher shops, boning rooms and meat wholesale markets, including ground (minced) meats. Bone in and whole muscle fillet for pork and red meat species including ground (minced) red meat. Bone in and whole muscle poultry fillet and ground (minced) poultry meat.	Low risk
8	**Processing of Manufactured Meats and Poultry**	EI: Processing of Perishable Animal Products	System elements Module 11: GMP for processing of food products	Applies to the processing, manufacture, transport and storage operations where meat (all red meat species and poultry) is the major ingredient including all value-adding operations (i.e. cook-chill, crumbing, curing, smoking, cooking, drying, fermenting and vacuum packing) and chilling and freezing operations, but not canning of meat or poultry product.	Includes poultry, pork and red meats blends and raw heat-treated and fermented poultry, pork and red meats including salami, hot dogs, sausages, bacon, pepperoni, and meat pastes etc.	High risk product and process knowledge required
9	**Seafood Processing:** Raw seafood and seafood products Uncooked RTE seafood Cooked RTE seafood	EI: Processing of Perishable Animal Products	System elements Module 11: GMP for processing of food products	Applies to the processing, manufacture, transport and storage of all fish and seafood species and extends to value-adding operations including dismembering, fermenting, crumbing, smoking, cooking freezing, chilling, drying and vacuum packing, but not canning of seafood product.	Includes: Whole fish, fish fillets, reformed fish cakes, coated fish portions uncooked fish product. sashimi, sushi and raw uncooked shellfish such as oyster and mussels, surimi smoked cooked fish products chilled or frozen that require no further cooking prior to consumption.	Some products are classified high risk. Uncooked RTE product is high risk and process knowledge required
10	**Dairy Food Processing**	EI: Processing of Perishable Animal Products	System elements Module 11: GMP for processing of food products	Applies to the processing, transport and storage of food products from all species used for milk collection and extends to all value-adding operations including freezing, pasteurizing, ultra-filtration, evaporation/concentration, fermentation, clarification, culturing and spray drying of milk but not UHT operations. (refer to FSC	Includes all milk collection and includes milk and cream, butter, cottage cheese, sour cream, all forms of cheese, yogurt, ice cream and dried milk. Also includes milk substitutes such as soymilk and tofu, and infant formula.	High risk product and process knowledge required

FSC	Category (Site Scope of Certification)	GFSI Industry Scopes	Applicable SQF Code Modules	Description	Example of Products	Level of Risk
				15). Includes milk substitutes where the technology is essentially the same.		
11	**Apiculture and Honey Processing**	EI: Processing of Perishable Animal Products	System elements Module 11: GMP for processing of food products	Applies to apiculture and the processing, transport and storage of food products from all species used for honey collection including value-added operations. Includes clarifying and treatment operations.	Includes apiculture, honey, honeycomb; pollen and royal jelly.	Some high risk process knowledge required
12	**Egg Processing**	EI: Processing of Perishable Animal Products	System elements Module 11: GMP for processing of food products	Applies to the, grading, cleaning, processing, transport and storage of food products from all species used for egg collection and processing.	Fresh shell eggs including value-added products where egg is the major ingredient.	High risk product; Generally low risk process
13	**Bakery and Snack Food Processing**	EIV: Processing of Ambient Stable Products	System elements Module 11: GMP for processing of food products	Applies to the processing, transport and storage of extruded snack foods and cake mix formulations and extends to all bakery operations.	Includes baked items such as meat pies, custard pies, bread, cookies, cakes and mixes and all varieties of snack food.	Some high risk process knowledge required
14	**Fruit, Vegetable and Nut Processing, and Fruit Juices**	EII: Processing or Perishable Plant Products	System elements Module 11: GMP for processing of food products	Applies to the processing, transport, storage and distribution of all processed fruit and vegetable varieties including freezing, fermenting drying, slicing, dicing, cutting, and modified atmosphere processing of all fruits and vegetables, and the roasting, drying, and cutting of nuts. Does not include canning of fruits and vegetables.	Includes frozen. fermented, dried, sliced, diced, cut, and modified atmosphere packaged (MAP) fruit, vegetable and nut products including prepared and deli salads. Includes fresh and pasteurized fruit and vegetable juices.	Some high risk process knowledge required
15	**Canning, UHT and Aseptic Operations**	EIV: Processing of Ambient Stable Products	System elements Module 11: GMP for processing of food products	Applies to the processing, of low acid canned foods, and sterilization (retorting) UHT, or other high temperature or high pressure processes (HPP) not covered elsewhere and the manufacture of the associated hermetically sealed containers.	Includes: The commercial sterilization of fish, meats, fruits and vegetables and other low acid soups and sauces in metal or glass containers or retort pouches. Does not include pasteurization of dairy, fruit or vegetable juices, but does include UHT treatment of • Pasteurized canned and chilled crab meat; • Milk or milk products; or • Egg or egg products; or • Fruit or vegetable juices. • Canned pet food	High risk product and process knowledge required
16	**Ice, Drink and Beverage Processing**	EIV: Processing of Ambient Stable Products	System elements Module 11: GMP for processing of	Applies to fermentation, concentration aseptic filling or drying operations processes. Does not include powdered milk and	Includes carbonated soft drinks, carbonated and non-carbonated waters, mineral water, ice, wine, beer	Some high risk process knowledge required

FSC	Category (Site Scope of Certification)	GFSI Industry Scopes	Applicable SQF Code Modules	Description	Example of Products	Level of Risk
			food products	pasteurization and UHT treatment of milk or milk products or fruit and vegetable juicing operations. Does not apply to dry beverage ingredients (e.g. tea, coffee).	and other alcoholic beverages.	
17	**Confectionary Manufacturing**	EIV: Processing of Ambient Stable Products	System elements Module 11: GMP for processing of food products	Applies to the preparation, transport and storage of all types of confectionary and extends to all chocolate and imitation chocolate-based processing.	Includes all confectionary products which undergo refining, conching, starch molding, compression, extrusion and vacuum cooking.	Some high risk process knowledge required
18	**Preserved Foods Manufacture**	EIV: Processing of Ambient Stable Products	System elements Module 11: GMP for processing of food products	Applies to the processing, transport and storage of all foods preserved under high temperature processes not covered elsewhere, compositionally preserved foods that are not high temperature processed or other alternative acceptable methods not covered elsewhere.	Includes dressings, mayonnaise, sauces, marinades, pickled foods, peanut butter, mustards, jams and fillings.	Some high risk process knowledge required
19	**Food Ingredient Manufacture**	L: Production of Bio-chemicals	System elements Module 11: GMP for processing of food products	Applies to the processing, blending, re-packaging transport and storage of dry food ingredients, cultures and yeast, but does not include dairy products, fermented meats or other fermented products mentioned elsewhere.	Includes starter cultures used in cheese, yogurt and wine manufacture and cultures used in the baking industry and other products such as vinegar used for the preservation of foods. Other additional products include additives, preservatives, flavorings, colorings, soup mixes, sauces, dehydrated culinary products, salt, sugar, spices and other condiments. Applies to dried tea and coffee products.	Some high risk process knowledge required
20	**Recipe Meals Manufacture**	EIII: Processing of Perishable Animal and Plant Products	System elements Module 11: GMP for processing of food products	Applies to the processing, receipt, controlled temperature storage and transport of foods prepared from a range of ingredients (mixed foods) that require cooking, heating, freezing, or refrigerated storage prior to serving. Includes sandwiches, wraps, and high-risk desserts for distribution to food service (If they are made on site and RTE, then fsc 23 applies).	Includes RTE chilled meals and deserts, frozen meals, pizza, frozen pasta, soups, and meal solutions, sous vide products, and freeze-dried and dehydrated meals. Includes sandwiches, wraps, and high-risk desserts for distribution to food service.	High risk product and process knowledge required
21	**Oils, Fats, and the Manufacture of oil or fat-based spreads**	EIII: Processing of Perishable Animal and Plant Products	System elements Module 11: GMP for processing of food products	Applies to the manufacture of all animal and vegetable oils and fats and to the manufacture of margarine. Includes clarifying and refining processes.	Includes shortening (animal and vegetable), oils (olive, peanut, corn, vegetable, sunflower, safflower, canola, nut, seed), and oil-based spreads such as margarine and oil based spreads.	Low risk
22	**Processing of**	EII: Processing or	System elements	Applies to the processing of cereals of all	Includes wheat, maize, rice, barley,	Some high risk

FSC	Category (Site Scope of Certification)	GFSI Industry Scopes	Applicable SQF Code Modules	Description	Example of Products	Level of Risk
	Cereal Grains	Perishable Plant Products	Module 11: GMP for processing of food products	varieties, including sorting, grading, picking, handling of bulk grains, milling, and extruding.	oats, millet, pasta, breakfast cereals.	process knowledge required
23	**Food Catering and Food Service Operations**	G: Catering	System Elements Module 15: GRP for Retail	Applies to all on-site food preparation and service activities, including transport, storage, and distribution undertaken with mixed foods that are ready-to-eat and do not require further treatment or processing by the consumer. Only applies to products prepared on site that are RTE.	Includes food service caterers, retail delicatessen/self-serve facilities, restaurants, fast food outlets, delicatessens, school cafeterias (canteens), hospital/institution meal services, childcare centers, and mobile and home delivery food services. Includes sandwiches, wraps, and high-risk desserts that are prepared on site and are RTE.	High risk product and process knowledge required
24	**Food Retailing**	H: Retail/ Wholesale	System Elements Module 15: GRP for Retail	Applies to the receipt, handling, storage and display at retail level of stable or pre-processed and packaged foods and/or food intended for further preparation by the consumer. Retailers that prepare RTE foods shall include fsc 23 as well.	Includes all foods distributed and sold through retail outlets. Does not include foods that are prepared on site and are RTE.	Low risk
25	**Repackaging of products not manufactured on site.**	EIV: Processing of Ambient Stable Products	System elements Module 11: GMP for processing of food products	Assembling of whole produce and packaged products (e.g. nuts, hard candy, dried fruit, and beef jerky) that are manufactured elsewhere (e.g. gift baskets, etc.). Applies to products not covered elsewhere.	Includes gift baskets, Christmas hampers, and presentation packs.	Low risk
26	**Food Storage and Distribution**	JII: Provision of Transport and Storage Services – Ambient Stable Food and Feed	System elements Module 12: GDP for transport and distribution of food products	Applies to the receipt, storage, display, consolidation and distribution of perishable fresh produce and general food lines including chilled, frozen, dry goods, stable or pre-processed and packaged foods and/or food intended for further preparation by the consumer at wholesale level.	Includes all transportation, storage and delivery of perishable and shelf-stable foods sold through markets, retail and foodservice facilities.. Includes transportation, storage and delivery of all varieties of fresh unprocessed fruit, vegetable and nut products.	Low risk
27	**Manufacture of Food Packaging**	M: Production of Food Packaging	System elements Module 13: GMP for manufacture of food packaging	Applies to the manufacture, storage and transport of food sector packaging materials. Includes items that may be used in food manufacturing or food service facilities, including paper towel, napkins, disposable food containers, straws, stirrers.	Includes all food-grade packaging materials including flexible films, paperboard based containers, metal containers, flexible pouches, glass containers, plastic and foam containers (PET, polystyrene, etc.), and single-use foodservice products (eg paper towel, napkins, disposable food containers, straws, stirrers).	Low risk
28	**Not in use**					

FSC	Category (Site Scope of Certification)	GFSI Industry Scopes	Applicable SQF Code Modules	Description	Example of Products	Level of Risk
29	**Not in use**					
30	**Not in use**					
31	**Manufacture of Dietary Supplements**	L: Production of Bio-chemicals	System elements Module 11: GMP for processing of food products	Applies to the manufacture, blending, transport and storage of dietary supplements.	Includes vitamins, probiotics and label supplements.	High risk product and process knowledge required
32	**Manufacture of Pet Food**	FII: Production of Compound Feed	System elements Module 4: GMP for processing of pet food products	Applies to the manufacture, of pet food intended for consumption by domestic animals and specialty pets.	Includes dry and moist pet foods and treats, semi-raw, chilled, or frozen product. Does not include canned pet food.	Some high risk process knowledge required
33	**Manufacture of Food Processing Aides**	L: Production of Bio-chemicals	System elements Module 11: GMP for processing of food products	Applies to the manufacture, storage and transport of chemicals and aides used in the food processing sectors.	Includes food grade lubricants, processing aides, and chemicals for clean-in-place systems.	Low risk
34	**Manufacture of Animal Feed**	FI: Production of Single Ingredient Feed	System elements Module 3: GMP for animal feed production	Applies to the manufacture, blending, transport and storage of animal feeds.	Includes compounded and medicated feeds.	Some high risk process knowledge required
35	**Not in use**					

Appendix 2: Glossary

Accreditation Approved by an accreditation body confirming that the management system of a certification body complies with the ISO/IEC 17065:2012 and the Criteria for SQF Certification Bodies requirements and that the certification body is suitable to be granted a license by SQFI to provide the service in the licensed territory (ies).

Airlock A space which permits the passage of people between one environment and another with two doors in series which do not open simultaneously, and thus minimizes the transfer of pests, dust, odors, or air from one area to the other.

Approved Supplier (s) Suppliers that have been assessed and approved by a site based on risk assessment as capable of meeting the sites food safety and quality requirements for goods and services supplied.

Audit A systematic and independent examination of a site's SQF food safety and/or quality System by an SQF food safety and/or quality auditor to determine whether food safety, quality systems, hygiene and management activities are undertaken in accordance with that system documentation and comply with the requirements of the SQF food safety and/or quality Code, as appropriate, and to verify whether these arrangements are implemented effectively.

Audit Checklist The list of SQF food safety and/or quality Code elements, customized for the site's audit scope, and available for use by the SQF food safety and/or quality auditor when conducting an SQF food safety and/or quality audit.

Auditor A person registered by the SQFI to audit a site's SQF food safety and/or quality System. An auditor must work on behalf of a licensed certification body. The terms "SQF auditor" and "SQF sub-contract auditor" shall have the same meaning.

Central Site An SQF certified site at which activities are planned to control and manage a network of SQF certified sub-sites within an SQF multi-site program (refer to SQFI's multi-site program requirements).

Certificate A certificate which includes a registration schedule (in a format approved by the SQFI), issued to a site by a licensed certification body following the successful completion of an SQF food safety and/or quality certification audit and/or a re-certification audit.

Certification Certification by a licensed SQF certification body of a site's SQF food safety and/or quality System as complying with the SQF food safety and/or quality Code, as appropriate, following a certification audit or re-certification audit. The terms, "certify," "certifies" and "certified" shall have a corresponding meaning under the SQF Program.

Certification Audit An audit of a site's whole SQF System, including a desk audit, where the site's SQF System:

a) has not been previously certified; or
b) has been previously certified but requires certification as the earlier certification has been revoked or voluntarily discontinued by the site.

Certification Body An entity which has entered into a license agreement with the SQFI authorizing it to certify a site's SQF System in accordance with the ISO / IEC 17065:2012 and the Criteria for SQF Certification Bodies.

Certification Cycle The annual period between a site's certification/re-certification audits.

Certification Number A unique numerical provided by the SQFI and included on the certificate, issued to a site that has successfully completed an SQF Food Safety or Quality certification audit.

Children Children are defined under the United Nations Convention on the Rights of the Child as "human beings below the age of 18 years unless majority is attained earlier under the applicable laws of a given country."

Codex Alimentarius Commission The internationally recognized entity whose purpose is to guide and promote the elaboration and establishment of definitions, standards and requirements for foods, and to assist in their harmonization and, in doing so, to facilitate international trade. The Commission Secretariat comprises staff from the Food and Agriculture Organization and the World Health Organization. The Codex Alimentarius Commission

	adopted the principles of the Hazard Analysis and Critical Control Point (HACCP) system in 1997.
Contract Manufacturer (or co-man, co-manufacturer)	Facilities that are contracted by the SQF certified site to produce, process, pack and /or store part of or all of one or more products included in the site's SQF scope of certification. In some cases, a product may be manufactured interchangeably at the certified site and by the contract manufacturer. In other cases, a contract manufacturer may only be used intermittently to fulfill or supplement the certified site's production. Contract manufacturers must follow the requirements outlined in the SQF Food Safety Code.
Corporate	An entity that does not manufacture or handle product but oversees and contributes to the food safety and/or quality management system at an SQF certified site.
Correction	Action to eliminate a detected non-conformity. Shall have the same meaning as "corrected."
Corrective Action	Action to eliminate the cause of a detected non-conformity or other undesirable situation. Corrective action shall include: a) Determine / document any immediate action required / taken i. Determine the cause of the problem ii. Evaluate action needed on the identified cause iii. Determine if the problem exists elsewhere in the system and implement actions needed b) Document the actions taken and the results of the action taken. i. Review/verify and document effectiveness of action taken with objective evidence.
Crisis Management	The process by which a site manages an event (e.g., a flood, a drought, a fire, etc.) that adversely affects the site's ability to provide continuity of supply of safe, quality food, and requires the implementation of a crisis management plan.
Customer	A buyer or person that purchases goods or services from the SQF certified site.
Desk Audit	A review of the site's SQF System documentation, forming part of and being the initial stage of the certification audit to ensure the System documentation substantially meets the requirements of the SQF Food Safety and/or Quality Code, as appropriate.
Deviation	A non-conformity raised against the SQF Quality Code. Deviations are graded as follows: A minor quality deviation is an omission or deficiency in the quality system that produces unsatisfactory conditions that if not addressed may lead to a quality threat but not likely to cause a system element breakdown. A major quality deviation is an omission or deficiency in the quality system producing unsatisfactory conditions that carry a significant quality threat and are likely to result in a system element breakdown. No critical deviations are raised at a quality systems audit. Timelines for the resolution of corrective actions are addressed in Part A, 3.2.
Environmental Monitoring Program (EMP)	A program which includes pathogen or indicator swabbing as appropriate to detect risk in the sanitary conditions in the processing environment. A verification of the effectiveness of the pathogen controls that a management facility has in place for high risk foods.
Exempt	A term applied to elements of the SQF Food Safety and Quality Code that the site does not wish to be included in the SQF System audit, and has submitted a written request to the certification body to exclude, prior to commencement of any scheduled audit activity. In the SQF Food Safety Code, mandatory elements of the system elements cannot be exempted. The certification body will confirm the reasons for exemption as part of the site audit. The term also applies to products, processes or areas of the site that the site wishes to exclude from the audit. A request is to be submitted to the certification body in writing prior to the audit activity, and shall be listed in the site description in the SQFI assessment database.

Facility	The site's premises at its street address. The production, manufacturing, or storage area where product is produced, processed, packaged, and/or stored, and includes the processes, equipment, environment, materials and personnel involved. The facility must be managed and supervised under the same operational management. The facility is the site audited during an on-site audit (refer to "site").
Feed	Any single or multiple materials, whether processed, semi-processes, or raw, which is intended to be fed directly to food-producing animals.
Feed Safety	The principles and practices applied to feed production and manufacturing to ensure that feed does not cause harm to animals or humans.
Food	Any substance, usually of animal or plant origin, intentionally consumed by humans, whether processed, partially processed or unprocessed. May include water, alcoholic and non-alcoholic drinks, materials included in a processed food product and any other substance identified by regulation (legislation) as a food.
Food Defense	As defined by the US Food and Drug administration, the efforts to prevent intentional food contamination by biological, physical, chemical or radiological hazards that are not reasonably likely to occur in the food supply.
Food Fraud	As defined by Michigan State University, a collective term used to encompass the deliberate and intentional substitution, addition, tampering, or misrepresentation of food, food ingredients, or food packaging; or false or misleading statements made about a product, for economic gain.
FMI	The Food Marketing Institute, a not-for-profit corporation, having its principal offices at 2345 Crystal Drive, Suite 800, Arlington, VA 22202, United States of America.
Food Packaging	The finished article used to package food.
Food Quality Plan	As described in the SQF Quality Code. It shall be based on the CODEX HACCP method, include process controls at quality points in production to monitor product quality, identify deviations from control parameters and define corrections necessary to keep the process under control.
Food Safety Certification Program Owner	As defined by the Global Food Safety Initiative, a systematic plan which has been developed, implemented and maintained for the scope of food safety. It consists of a standard and food safety system in relation to specified processes or a food safety service to which the same particular plan applies. The food safety program should contain at least a standard, a clearly defined scope, and a food safety system.
Food Safety Fundamentals	An entry level Code for new and developing businesses that covers basic Good Agricultural or Aquaculture Practices (GAPs), Good Manufacturing Practices (GMPs), or Good Distribution Practices (GDPs) and defines the essential elements that must be implemented to meet relevant legislative and customer food safety requirements. Sites that comply with the SQF Code certification requirements for the Food Safety Fundamentals Code receive an accredited certificate from an SQFI licensed certification body.
Food Safety Plan	As described in the SQF Food Safety Code. The plan shall be prepared based on the CODEX HACCP method, include process controls at control points in production to monitor product safety, identify deviations from control parameters and define corrections necessary to keep the process under control.
Food Sector Category (FSC)	A classification scheme established to assist in a uniform approach to management of the SQF Program and means those food industry, manufacturing, production, processing, storage, wholesaling, distribution, retailing and food service activities and other food sector services and auditor and consultant registration as defined by the SQFI.
General Requirements	The current edition of the document entitled "Criteria for SQF Certification Bodies: SQF Guidance on the Application of ISO/IEC 17065:2012, General Requirements for Certification Bodies," published by The SQFI.
Good Agricultural Practices (GAPs)	Practices on farms which define the essential elements for the development of best-practice for production, incorporating integrated crop management, integrated pest management, and integrated agricultural hygienic practices.

Good Aquaculture Practices (GAPs)	Practices on aquaculture farms and wild catch fisheries which define the essential elements for the development of best-practice for production, incorporating integrated water quality, veterinary and growth practices, and handling and hygienic practices.
Good Manufacturing Practices (GMPs)	The combination of management and manufacturing practices designed to ensure food products are consistently produced to meet relevant legislative and customer specifications.
HACCP	The Hazard Analysis Critical Control Point (HACCP) system and refers to the HACCP guidelines developed and managed by the Food and Agriculture Organization's CODEX Alimentarius Commission. Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application – Annex to CAC/RCP 1 – 1969, Rev. 4-2003), – "A system, which identifies, evaluates and controls hazards which are significant for food safety."
HACCP Method	The implementation of pre-requisite programs and the application of HACCP principles in the logical sequence of the twelve steps as described in the current edition of the CODEX Alimentarius Commission Guidelines. The SQF Food Safety and Quality Codes utilize the HACCP method to control food safety hazards and quality threats in the segment of the food chain under consideration..
HACCP Plan	A document prepared in accordance with the CODEX HACCP method to ensure control of hazards which are significant for food safety or the identification of quality threats for the product under consideration.
HACCP Training	Training that meets the guidelines outlined in the Food and Agriculture Organization's CODEX Alimentarius Commission. Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application – Annex to CAC/RCP 1 – 1969, Rev. 4-2003), – "A system, which identifies, evaluates and controls hazards which are significant for food safety." And this training shall be: 1. Recognized as a HACCP training course used extensively in a country. 2. Administered and delivered by an institution recognized as a food safety training center of excellence. 3. A minimum of two days (16 hours) in duration, or equivalent. 4. The acquired knowledge of the candidate shall be assessed as part of the training program.
Hazardous Chemicals and Toxic Substances	Solids, liquids or gasses that are radioactive, flammable, explosive, corrosive, oxidizing, asphyxiating, pathogenic, or allergenic, including but not restricted to detergents, sanitizers, pest control chemicals, lubricants, paints, processing aids, bio-chemical additives, which if used or handled incorrectly or in increased dosage may cause harm to the handler and/or consumer. Hazardous or toxic chemicals may be prescribed by regulation as "dangerous goods" and may carry a "poison," "Hazmat" or "Hazchem" label depending on the jurisdiction.
High Risk Area	A segregated room or area where high risk food processes are performed, and which require a higher level of hygienic practice is required to prevent contamination of high risk food by pathogenic organisms.
High Risk Food	Food or food product with known attributes for microbiological growth, physical or chemical contamination, or which due to a process type may allow for the survival of pathogenic microbial flora or other contamination which, if not controlled, may contribute to illness of the consumer. It may also apply to a food that is deemed high risk by a customer, declared high risk by the relevant food regulation or has caused a major foodborne illness outbreak.
High Risk Food Process(es)	A process that requires specific controls and/or a higher level of hygienic practice to prevent food contamination from pathogens.
Industry Code of Practice	Industry norms, rules or protocols established by industry groups which provide practical, industry specific guidelines on meeting regulations while meeting industry needs.
Inspection Area	A designated station close to the process for the purpose of monitoring food safety and/or quality attributes and parameters.
Legality	Legality refers to national federal, state and local regulations applicable to the

	certified product in the country of manufacture and intended markets.
Licensed Certification Body (LCB)	An entity which has entered into a license agreement with the SQFI authorizing it to manage the auditing and certification of site's SQF System.
Low Risk Food	A food containing high acid that is not known to support the growth of pathogens; a food that is subject to a full cook prior to consumption.
Mandatory Elements	System elements that must be implemented and audited for a site to achieve SQF certification; system elements that cannot be exempted during a certification/re-certification audit.
Maximum Residue Limits (MRLs)	Generally set by local regulation or CODEX Alimentarius Commission, and applies to maximum allowable trace levels of agricultural and veterinary chemicals in agricultural produce, particularly produce entering the food chain.
Multi-site Certification	Multi-site certification involves the designation and certification of a central site (i.e. manufacturer, packer, warehouse) into which a network of certified sub-sites all performing the same function feed into. The central site and all sub-sites are all located in the one country and operate under the same food safety legislation (refer to SQFI's multi-site program requirements).
Multi-site Program	An SQF multi-site program is comprised of a central-SQF certified site under which activities are planned to manage and control the food safety management systems of a network of sub-sites under a legal or contractual link (refer to SQFI's multi-site program requirements).
Multi-site Sampling Program	As defined by the Global Food Safety Initiative Requirements Document, a program of sub-site audits defined by the certification program owner, but will be determined by the certification body based upon specified criteria.
Non conformity (or Non-conformance)	Refers to the following definitions: A minor non-conformity is an omission or deficiency in the SQF System that produces unsatisfactory conditions that if not addressed may lead to a risk to food safety and/or quality but not likely to cause a system element breakdown. A major non-conformity is an omission or deficiency in the SQF System producing unsatisfactory conditions that carry a food safety and/or quality risk and likely to result in a system element breakdown. A critical non-conformity is a breakdown of control (s) at a critical control point, a pre-requisite program, or other process step and judged likely to cause a significant public health risk and/or where product is contaminated. A critical non-conformity is also raised if the site fails to take effective corrective action within the timeframe agreed with the certification body, or if the certification body deems that there is systemic falsification of records relating to food safety controls and the SQF System. Critical non-conformities cannot be raised at desk audits.
N/A	Stands for "not applicable" and may be reported during the SQF food safety and/or quality audit by the food safety and/or quality auditor when an element does not apply immediately but the site is still responsible for the element. N/A may also be reported to avoid double debiting, for example where a non-conformity has been raised against a similar, but more appropriate element. In this case, the element will be reported as "N/A."
On-site Laboratories	A designated and enclosed area in the site in which chemical, microbiological and other product testing is conducted and if not controlled could lead to contamination and requires the use of good laboratory practices.
Pests	Vermin, including birds, rodents, insects, or other unwanted species that can carry disease and pose a risk to packaging, feed or food.
Pet Food	Any substance intended for consumption by domestic animals and specialty pets. It includes dry and moist pet foods and treats, semi-raw, canned, chilled, or frozen product.
Plan	As defined by ISO 9001, a document(s) used to establish the objectives and processes necessary to deliver results in accordance with customer requirements and

	the organization's policies. (refer to Food Safety Plan, Food Quality Plan).
Potable	Water that is safe to drink.
Pre-requisite Program	A procedural measure that when implemented reduces the likelihood of a food safety hazard or a food quality threat occurring, but one that may not be directly related to activities taking place during production.
Primary Producer or Producer	A sole entity involved in the pre-farm gate production, field packing, storage and supply of food produced and/or harvested under their exclusive control.
Processing	The processing of food through one or more steps in which the nature of the food is changed. Processing includes but is not limited to repacking, over bagging and re-labeling of food, slaughtering, dismembering, sorting, grading, cleaning, treating, drying, salting, smoking, cooking, canning, purifying and the pasteurization of food.
Product	Those products that apply to a specific food sector category as defined by the SQFI.
Program	A plan(s) used to establish the objectives and processes necessary to deliver results in accordance with customer requirements and the organization's policies." Examples include allergen management program or an environmental monitoring program.
Purity	The absence of contaminants that could cause a food safety hazard.
Quality	A measure of exceeding customer or corporate expectations and a state of being free from defects, deficiencies and significant variation.
Quality Threat	See threat.
Re-certification	A re-certification by a certification body of a site's SQF food safety or quality System as a result of a re-certification audit, and re-certified shall have a corresponding meaning.
Re-certification Audit	An audit of the site's SQF food safety or quality System within thirty (30) calendar days of the anniversary of certification.
Recoup	Product that is intact and requires no further processing or handling but is repackaged for distribution. For example, mixing of partial cases to build one complete case. May also be referred to as "repack."
Registration Schedule	The portion of the certificate setting out the scope of and the nature and extent of the rights of use of the quality shield granted to the site.
Rework	Food, materials, and ingredients, including work in progress that has left the normal product flow and requires action to be taken on it before it is acceptable for release and is suitable for reuse within the process.
Rules of Use	The rules and procedures contained in SQF Logo and/or Quality Shield Rules of Use and includes the certificate schedule and any modification, variation or replacement of the SQF trademark rules of use.
Scope of Certification	The food sector categories and those products to be covered by the certificate.
Season or Seasonal	A period in which the major activity is conducted over not more than five consecutive months in a calendar year; for example, harvesting and packing during the apple season.
SQFI Select Site	Recognition stated on the SQFI certificate for sites who have undergone an annual unannounced re-certification audit.
Senior Site Management	Individuals at the highest level on site responsible for the business operation and implementation and improvement of the food safety and quality management system.
Site	Any food business involved in the production, manufacture, processing, transport, storage, distribution or sale of food, beverages, packaging, animal feed, or pet food, or providing support services to the food sector and run by a person, company, cooperative, partnership, joint venture, business or other organization who has, or agrees to have, a licensed SQF certification body carry out audits and certification of its SQF System.
Site Audit	The second part of a certification audit that reviews the site's products and processes

	on-site to determine the effective implementation of the site's documented SQF food safety or quality System.
SQF Auditor	The same meaning as auditor.
SQF Consultant	A person who is registered by the SQFI to assist in the development, validation, verification, implementation and maintenance of SQF System on behalf of client site in the food industry categories appropriate to their scope of registration.
SQF Logo	Means the SQF logo depicted in SQF Logo Rules of Use.
SQF Practitioner	An individual designated by a site to oversee the development, implementation, review and maintenance that site's own SQF System. The SQF practitioner qualification details will be verified by the SQF food safety or quality auditor during the certification/re-certification audit as meeting the following requirements: i. Oversee the development, implementation, review and maintenance of the SQF System, including food safety fundamentals outlined in 2.4.2, and the food safety plan outlined in 2.4.3. ii. Take appropriate action to ensure the integrity of the SQF food safety and/or quality System. iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF food safety and/or quality System. iv. Ensure that site personnel have the required competencies to carry out those functions affecting products, legality, and safety. The SQF quality practitioner shall also have responsibility and authority to oversee the development, implementation, review and maintenance of the SQF Quality Code, including the food quality plan.
SQF Program	The SQF Food Safety and/or Quality Code and all associated System, rules, quality shield, intellectual property and documents.
SQF Quality Shield	Means the SQF shield depicted in SQF Quality Shield Rules of Use.
SQF System	A risk management and preventive system that includes a food safety plan or food quality plan implemented and operated by a site to assure food safety or quality. It is implemented and maintained by an SQF practitioner, audited by an SQF food safety or quality auditor and certified by a licensed certification body as meeting the requirements relevant to the SQF Food Safety or Quality Code.
SQF Trainer	An individual contracted to a licensed SQF training center that has applied and met the requirements listed in the "Criteria for SQF Trainers" published by SQFI and, upon approval, is registered under the SQFI to provide consistent training on the SQF Program.
SQFI	The SQF Institute, a division of the Food Marketing Institute (FMI).
SQFI Assessment Database	The online database used by the SQFI to manage site registration, site audits, close out of corrective actions, and site certification.
System Elements	The SQF food safety management requirements applied by all sites throughout the supply chain for SQF certification.
Standard	A normative document and other defined normative documents, established by consensus and approved by a body that provide, for common and repeated use, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context.
Sub-site	An SQF certified site which operates under a contractual link to an SQF certified central site within an SQF multi-site program (refer to SQFI's multi-site program requirements).
Supplier	The entity that provides a product or service to the SQF certified site.
Surveillance Audit	A six (6) monthly audit (or more frequently as determined by the certification body) of part of a site's SQF System where that system has previously been certified or re-

	certified and whose certification is current. Multi-site certification requires surveillance audits every six (6) months at a minimum.
Technical Expert	An individual engaged by a licensed SQF certification body to provide a high level of technical support to the certification audit team. The technical expert shall be approved by the SQFI prior to the certification/re-certification audit, demonstrate a high degree of expertise and technical competence in the food sector category under study, a sound knowledge and understanding of the HACCP method and where possible be registered as an SQF consultant.
Threat	An identified risk that has the potential, if not controlled, to affect the quality of a product.
Trademarks	A recognizable label, logo, or mark which identifies a raw material or finished product with a particular producer, manufacturer, or retailer.
Training Center	An entity which has entered into a license agreement with the SQFI to deliver SQFI-licensed training courses, including the "Implementing SQF Systems," "Quality Systems for Manufacturing" and "Advanced SQF Practitioner" training courses.
Unannounced Audit	A re-certification audit that is conducted once at a minimum within every three (3) certification cycles and thirty (30) days on either side the initial certification anniversary date without prior notice to the SQF certified site. A site may forgo the three-year certification cycle requirement and voluntarily elect to have annual unannounced re-certification audits. Sites with annual unannounced re-certification audits shall be recognized on the SQFI certificate as an "SQFI select site."
Validation	As defined in the Food and Agriculture Organization's CODEX Alimentarius Commission. Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application – Annex to CAC/RCP 1 – 1969, Rev. 4-2003), – "A system, which identifies, evaluates and controls hazards which are significant for food safety. Essentially validation as applied to control limits seeks to prove that the intended result was achieved and that it actually worked.
Verification	As defined in the Food and Agriculture Organization's CODEX Alimentarius Commission. Hazard Analysis and Critical Control Point (HACCP) System and Guidelines for its Application – Annex to CAC/RCP 1 – 1969, Rev. 4-2003), – "A system, which identifies, evaluates and controls hazards which are significant for food safety. Essentially verification as applied to control measures seeks to prove that the control measure was done according to its design.
Verification Schedule	A schedule outlining the frequency and responsibility for carrying out the methods, procedures or tests additional to those used in monitoring, to determine that the HACCP study was completed correctly, that the relevant SQF System is compliant with the relevant food safety and/or food quality plan and that it continues to be effective.
Vision and Mission Statement	A statement issued by senior site management outlining the site's quality goals and objectives. It may be combined with, or separate from the site's food safety policy.
Water Treatment	The microbiological, chemical, and/or physical treatment of water for use in processing or cleaning, to ensure its potability and suitability for use.

Appendix 3: SQF Logo Rules of Use

1 Introduction

1.1 The SQF logo is owned by SQFI.

1.2 Sites at all levels of certification will have the right to use the SQF logo upon and for the duration of certification. There will be no fee payable by sites for the right to use the SQF logo, other than fees payable to obtain and maintain certification.

1.3 Sites obtain no property in the SQF logo.

1.4 Sites may only use the SQF logo in accordance with these rules of use, which are designed to protect the integrity and enhance the value of the SQF logo.

1.5 SQFI delegates any or all of its functions described herein to a SQFI licensed certification body (CB).

1.6 These rules of use regulate the use of the SQF logo by certified sites only. These rules of use do not regulate the use of the SQF logo by SQFI, CBs or other entities licensed by SQFI to use them, unless otherwise provided for in this or another instrument.

2 Conditions for Use

2.1 A site shall, for the duration of its certification, prove to the satisfaction of SQFI and the CB that its SQF System satisfies the requirements set forth in the current edition of the SQF Food Safety and/or Quality Code or that it meets the requirements spelled out in the SQF Food Safety Fundamentals; and

2.2 A site must only use the SQF logo in accordance with its certificate and these rules of use.

3 Reproduction

3.1 If a site wishes to reproduce the SQF logo it must do so strictly in accordance with the requirements and specifications set out in Schedule 2.

4 Obligations of a Site

4.1 A site must:

a) comply fully with these rules of use;

b) direct any queries regarding their intended use of the SQF logo to the certifying CB who issued the certificate;

c) discontinue any use of the SQF logo to which SQFI or the certifying CB reasonably objects;

d) operate entirely within the scope of its certificate, including the certification schedule. Subsidiary companies and site addresses not included on the certificate of registration are not certified to use the SQF logo;

e) give SQFI, a CB and/or their agents access to examine publicity material and all other such items bearing or indicating the SQF logo for the purpose of confirming compliance with these rules of use and the certificate; and

f) pay within the specified time any fees set by SQFI.

5 Grounds for Suspending or Ceasing Use of the SQF Logo

5.1 The permission for a site to use the SQF logo will:

a) be suspended if the site's certification is suspended; all efforts must be made to suspend in the manufacturing process of the use of the SQF logo upon certificate suspension;

b) cease to be used within the operation if the site's certification is withdrawn, relinquished or not renewed.

5.2 Conditions for suspending or ceasing a site's permission to use the SQF logo, to be notified by the certifying CB, include (but are not necessarily limited to):

a) suspended if the site breaches or fails to comply with these rules of use;

b) suspended if the site fails to use the SQF logo in accordance with its certificate, including the certification schedule;

c) ceased if the site uses the SQF logo in a way that, in the opinion of SQFI or the CB, is detrimental to the SQF logo or the SQF program as a whole, is misleading to the public or otherwise contrary to law; or

d) ceased if the site has an administrator, receiver, receiver and manager, official manager or provisional liquidator appointed over its assets or where an order is made or a resolution passed for the winding up of the site (except for the purpose of amalgamation or reconstruction) or the site ceases to carry on business or becomes bankrupt, applies to take the benefit of any law for the relief of bankrupt or insolvent debtors or makes any arrangement or composition with its creditors.

6 Disclaimer

6.1 SQFI may from time to time alter these rules of use or make new rules but no such alteration or new rule shall affect the use of the SQF logo by a site until six (6) months have expired from the date the alteration or new rules of use are first published by SQFI on its website (sqfi.com) unless specified by SQFI.

SCHEDULE 1: REPRODUCTION REQUIREMENTS FOR THE SQF LOGO

Introduction

Sites who achieve and maintain certification to the SQF Food Safety Fundamentals or the SQF Food Safety Code and/or the SQF Quality Code are granted permission by their certifying CB to use the SQF logo, subject to the rules of use and the conditions set out hereunder per site.

Electronic SQF logo files are to be obtained from the certifying CB.

Color Format	For Use On
Full Color Reproduction: see PMS color format set out at Schedule 2 Clause 2.	• brochures, flyers, advertisements, press releases, company website, email signature lines • internal documents and training materials
Single Color Reproduction: black and white.	• brochures, flyers, advertisements, press releases, company website, email signature lines • internal documents and training materials

Color Reproduction of the SQF Logo

Reproduction of the SQF logo is to be clear, precise and of the highest standard. The following guidelines govern full color reproduction.

PMS 3005C
CMYK: C=100, M=34, Y=0, K=2

Dimensions

To ensure readability, do not reproduce the SQF logo smaller than indicated below. Larger variation to these dimensions is permitted provided that any such variation is proportional to the dimensions given below.

Special Cases

Where it is demonstrated that alternative reproduction of the SQF logo enhances the status of the SQF logo and/or SQFI, then the alternative is permitted provided it is approved by the certifying CB. All requests must be provided in writing **per certified site** to the certifying CB and SQFI.

Appendix 4: Requirements for SQF Multi-site Certification

1 Scope

1.1 This appendix outlines the requirements for establishing and maintaining certification of a multi-site program that is managed by an SQF certified central site that is engaged in low risk activities.

1.2 The multi-site program involves a central packinghouse, manufacturer of primary products, warehouse or distribution center and the number of sub-sites shall be a minimum of twenty (20).

2 Definitions

2.1 A SQF multi-site program is comprised of a central site under which activities are planned to manage and control the food safety and quality management systems of a network of sub-sites under a legal or contractual link.

2.2 For the purpose of this Code the definitions outlined in Appendix 2: Glossary and the following definitions apply.

2.3 The central-site is an entity certified to a SQF Food Safety Code (i.e. manufacturing/packhouse or distribution center) or eligible for such certification, has a network of primary supplier sub-sites that are eligible for certification to an appropriate SQF Food Safety Code and are all involved in similar activities as per 3.7 below. The central site and all sub-sites are all located in the one country and operate under the same food safety legislation.

3 Eligibility Criteria for the Multi-site Organization

3.1 The central site is the entity responsible for the SQF multi-site program.

3.2 Sub-sites shall be linked to the central site by a legal or contractual arrangement.

3.3 The central site and not any sub-site shall be contracted with the certification body. The central site and all sub-sites in the multi-site program shall be audited by one certification body.

3.4 Central sites shall implement an SQF System that includes management of the sub-sites and internal audit of the sub-sites. The central site and the sub-sites shall be certified to a SQF Food Safety Code. Central sites can be certified to the SQF Quality Code however, sub-sites are not eligible for certification to the SQF Quality Code.

3.5 Sub-sites shall implement an SQF System which is subject to continuous surveillance by the central site.

3.6 The central site shall have authoritative control of the food safety management system of all subsites, including implementation of corrective actions when needed in any sub-site, and shall retain all relevant documentation associated with the sub-sites. These shall be included in the agreement between the central site and the sub-sites.

3.7 The product(s) or service(s) provided by each of the sub-sites shall be substantially of the same kind and produced according to the same fundamental methods and procedures. The size and/or complexity of each of the sub-sites shall be similar.

3.8 The central site shall establish and maintain SQF certification for the duration of the SQF multi-site program.

3.9 The central site's SQF management system shall be administered under a centrally controlled plan and be subject to central management review.

3.10 The central site shall demonstrate an ability to collect and analyze data from all sites, including the central site, and have the authority and ability to initiate organizational change if required.

3.11 The central administration function and the sub-sites shall be subject to the central site's internal audit program and shall be audited in accordance with that program. Internal audits shall be

conducted at sub-sites, prior to the central site certification audit, in a quantity sufficient to allow the certification body to access whether the site is in compliance and apply to sub-site sample selection (see 8.0 below). All sub-sites are required, within a calendar year or season, to have an internal audit as per 4.2 below.

4. Internal Audits

4.1 The central site shall document its internal audit procedure which shall include an internal audit schedule and outline the method of conducting audits of sub-sites and the central site administrative function.

4.2 An internal audit, which includes all relevant elements of a SQF Food Safety Code, and the Good Agriculture/Aquaculture Practices (GAP), Good Manufacturing Practices (GMP) or Good Distribution Practices (GDP) module(s) applicable to the food sector category, shall be conducted at least once per year, and during periods of peak activity at all sub-sites included in the multi-site certification.

5. Internal Audit Personnel

5.1 Personnel conducting internal audits shall:

i. Successfully complete the Implementing SQF Systems training course.
ii. Successfully complete internal auditor training.
iii. Have competence in the same food sector category as the internal audit.

5.2 Personnel reviewing the internal audits of the multi-site organization and evaluating the results of those internal audits shall:

i. Be separate from personnel conducting the internal audits;
ii. Complete Internal Auditing Training; and
iii. Meet the criteria of an SQF practitioner

5.3 Where the internal audits are contracted out:

i. The contractor shall be a registered SQF Auditor or Consultant,
ii. The central site shall be accountable for the actions and effectiveness of the work completed by the contractor; and
iii. Contract arrangements shall comply with 2.3.3 of the applicable SQF Food Safety Code.

6. Auditing and Certifying the Multi-site Organization

6.1 The Audits and certification of an SQF multi-site organization shall be completed by a SQF licensed and accredited certification body. The audit includes:

i. The certification audit (including initial desk audit of the central site only and site audit);
ii. Surveillance audits; and
iii. Re-certification audits.

6.2 The initial certification audit and subsequent surveillance and re-certification audits of the multi-site organization shall be centered on the central site, it's internal audit function and a sample of the sub-sites. Record reviews for sub-sites will be completed at the sub-site site audit.

7. Audit Frequency

7.1 The certification audit of the central site and a sample (refer to 8.0) of sub-sites are conducted every twelve months.

7.2 Re-certification audits for the central site is conducted on the anniversary of the last day of the initial certification audit, plus or minus 30 calendar days. For seasonal operations timing for sub-sites should be guided by the harvesting dates, that may be weather dependent, as well as time required for the central site to adequately complete the Internal Audit Program.

7.3 Within each certification and re-certification audit cycle, the central site shall be audited before the majority of the sample of sub-sites. It is recognized that for seasonal operations harvesting dates and having product available to the central site may require some sub-sites audits being conducted prior to the central site audit.

7.4 Surveillance audits are conducted for any site in the multi-site program that receives a 'C-Complies' rating. Surveillance audits are conducted six (6) months from the last day of the last certification audit, plus or minus thirty (30) calendar days or as per Part A 4.3 for seasonal operations. Where a sub-site is subject to a surveillance audit due to a "C - Complies" rating, the internal audit of that sub-site by the central site shall also be reviewed. If the sub-site is not in operational within the six (6) month time frame for the surveillance audit then it shall be audited within the first two (2) weeks of the subsequent harvest and automatically be included in the sub-site sampling calculation (refer to 9.0).

7.5 If the central site or any one of the sampled sub-sites is identified as having a critical non-conformity at an audit, or otherwise achieves only an "F – Fails to comply" rating, the certificates for the central site and ALL sub-sites shall be suspended until such time as a "C – Complies" rating or better is achieved at a further round of audits at the central site and a sample of sub-sites. The sub-site(s) that receives the "F – Fails to comply" rating shall be included in the sub-site selection process (refer to 8.0) for the next audit cycle.

8. Selecting the Sub-sites

8.1 The selection of the sample is the responsibility of the certification body.

8.2 The sample is partly selective based on the factors set out below and partly non-selective, and shall result in a range of different sub-sites being selected, without excluding the random element of sampling. At least twenty-five (25) percent of the sub-sites selected shall be based on random selection.

8.3 The sample of sub-sites shall be selected so that the differences among the selected sub-sites, over the period of validity of the certificate, are as large as possible.

8.4 The sub-site selection criteria shall include among others the following aspects:

i. Results of internal audits or previous certification assessments;
ii. Records of complaints and other relevant aspects of correction and corrective action;
iii. Significant variations in the size of the sub-sites;
iv. Variations in the work procedures;
v. Modifications since the last certification assessment;
vi. Geographical dispersion; and
vii. New suppliers added into the program (refer to 10.0).

8.5 The certification body shall inform the central site of the sub-sites that will comprise the sample and in a timely manner that will allow the central site adequate time to prepare for the audits.

8.6 The central site shall ensure that all sub-sites listed as being included in the sub-site audit selection process are registered with SQF (Part A, 1.3). The central site shall also ensure that the SQF database is updated to reflect any sub-sites being removed from the previous year multi-site program.

9. Determining the Size of the Sub-sites Sample

9.1 The certification body shall record the justification for applying a sample size outside that described in this clause.

9.2 The minimum number of sub-sites to be audited at a certification audit or re-certification audit is the square root of the number of sub-sites with 1.5 as a co-efficient ($y=1.5\sqrt{x}$), rounded to the higher whole number. As per 1.2 above a minimum of twenty (20) sub-sites are required.

9.3 Where a primary sub-site has 4 or more secondary sites (e.g. growing areas), the primary location shall be audited and 50% of the secondary sites. More than fifty (50) percent can be audited if there is evidence that there are grounds to justify the further audit time.

9.4 The size of sample shall be increased where the certification body's risk analysis of the activity covered by the management system subject to certification indicates special circumstances in respect of factors like:

i. Major variations in processes undertaken at each sub-site;
ii. Records of complaints and other relevant aspects of correction and corrective action;
iii. Indication of an overall breakdown of food safety controls; or

iv. Inadequate internal audits or action arising from internal audit findings.

10. Additional Sub-sites

10.1 On the application of a new sub-site or group of sub-sites to join an already certified SQF multi-site program, each new sub-site or group of sub-sites shall be included in the audit sample for the next re-certification audit. The new sub-sites shall be added to the existing sites for determining the sample size for future re-certification audits. Sub-sites transferring from another multi-site group or from a stand-alone certification are not classified as "new" and are not subject to being included in the sub-site audit sample unless part of the random selection process or due to auditor/Certification Body discretion.

10.2 New sub-sites shall not be added to the sub-site list once the list has been verified and agreed to by the central site and the certification body during the annual sample site selection process. These sites can have their SQF systems components (SQF Food Safety system elements) managed by the central site but will certified as a stand-alone operation and subject to initial certification requirements, including desk and site audits.

11. Non-Conformities

11.1 When non-conformities are found at any individual sub-site through the central site's internal auditing, investigation by the central site shall take place to determine whether the other sub-sites may be affected. The certification body shall require evidence that the central site has taken action to rectify all non-conformities found during internal audits and that all non-conformities are reviewed to determine whether they indicate an overall system deficiency applicable to all sub-sites or not. If they are found to do so, appropriate corrective action shall be taken both at the central site and at the individual sub-sites. The central site shall demonstrate to the certification body the justification for all follow-up action.

11.2 When non-conformities are found at the central site or at any individual sub-site through auditing by the certification body, action shall be taken by the certification body as outlined in Part A, 3.2.

11.3 When non-conformities for system elements are found at the central site, the certification body shall increase its sampling frequency until it is satisfied that control has been re-established by the central site.

11.4 At the time of the initial certification and subsequent re-certification a certificate shall not be issued to the central site and sub-sites until satisfactory corrective action is taken to close out all non-conformities.

11.5 It shall not be admissible that, in order to overcome the obstacle raised by the existence of non-conformity at a single sub-site, the central site seeks to exempt from the scope of certification the "problematic" sub-site during the certification, surveillance or re-certification audit.

12. Certificate Issued for a Multi-site Organization

12.1 A certificate shall be issued to the central site and all sub-sites within the SQF multi-site program. The central site's certificate shall include an appendix listing all sub-sites participating in the multi-site program. The sub-site certification shall state within its scope of certification that it is part of a multi-site certification and shall list all primary and secondary sub-sites. Products listed on sub-site certificates may vary from the central site certificate, provided the scope of operations meets requirements of 3.7 and the certificate body has conducted an on-site audit during harvesting activities of those products not included in the Multi-site program.

12.2 The certification date for the central site and sub-sites shall be the date of the last audit conducted in that certification cycle. The certificate expiry date shall be based on the certificate decision of the last date of the sub-site audit.

12.3 The certificate for all sites in the multi-site program will be withdrawn, if the central site or any of the sub-sites do not fulfill the necessary criteria for maintaining their certificate.

12.4 The list of sub-sites shall be kept updated by the central site. The central site shall inform the certification body about the closure of any of the sub-sites or the addition of new sub-sites. Failure to provide such information will be considered by the certification body as a misuse of the certificate, and the multi-site organization's certificate shall be suspended until the matter is corrected to the satisfaction of the certification body.