

TUV Staff Highlight



Last fall, TUV USA welcomed Paul Fallaw as Program Manager of the Food Safety Division. Paul spent the last 10 years auditing and consulting and is a recognized food specialist with in-depth expertise in quality assurance, product development, regulatory affairs, manufacturing, and packaging.

Prior to a career in third-party certification, Paul held various roles in Quality Assurance and Regulatory Compliance with Hain Celestial Food Group, Cargill and Kraft Foods. His strong analytical abilities, proven technical leadership and management skills make him a great addition to the TUV USA team. Paul has a B.S. in Chemical Biology from Rhodes College in Memphis, TN.

SQF 8: Key Changes and the Impact for Suppliers

By Paul Fallaw and Lori Carlson

Long awaited edition 8 of the SQF Code is nearly published. Many of the proposed changes are geared at helping sites develop and implement practices, which support regulatory compliance with FSMA legislation, and promote industry best practices.

While currently out for final public comment—which ends February 6, 2017—TUV compiled a short list of proposed changes that we find will impact suppliers the most. With six months for implementation from publication date, is your food safety and quality management system ready?

- 1. Allergen Management** – The new edition of the Code strengthens allergen management practices in response to continued recalls for allergen mislabeling and alignment with FSMA's Preventive Controls regulation. New requirements build on established practices by supplementing with expectations for the monitoring of segregation activities, documented changeover procedures, control and verification of labels, and re-work identification where allergenic materials are present.
- 2. Environmental Monitoring** – The requirement for an environmental monitoring program shall apply to all processes under edition 8 and is no longer exclusive to high-risk. The program shall additionally ensure that test results are monitored with corrective action applied where out-of-specification results or unsatisfactory trends occur.
- 3. Supplier Approval** – New additions to the approved supplier program include requirements for food defense and food fraud vulnerability assessments of incoming materials along with appropriate mitigation strategies to protect goods. Changes in edition 8 also require risk-based supplier audits by individuals knowledgeable of food safety regulation and risk requirements with training in auditing techniques.

4. **Food Defense and Food Fraud** – Site security requirements have changed to address site vulnerabilities for intentional and economic adulteration of food including the fraudulent acts of mislabeling and counterfeit production. New requirements include annual review and challenge of the food defense plan as well as the development of a food fraud vulnerability assessment and mitigation plan—also with the expectation for annual review and verification.
5. **Management Review** – Under edition 8, SQF practitioners will be responsible for reporting to site senior management on matters that impact implementation and maintenance of the SQF system on a monthly basis with requirements for documenting updates and management response.
6. **Training** – New training requirements include designating SQF practitioners as responsible for ensuring that site personnel have necessary food safety competencies. Training updates also require on-site personnel who perform environmental monitoring or product testing to participate in applicable proficiency testing annually.
7. **Product Identification** – Product changeovers will need to be inspected and approved by an authorized person according to a written procedure, which ensures that the correct package and label are used.
8. **Identity Preservation** – Level 2 certifiers will now have to establish identity preservation (IP) procedures and responsibility to ensure product integrity where these products (e.g., non-GMO, gluten-free, organic, etc.) are handled on site. This requirement was previously only required by Level 3 certifiers.
9. **Internal Audits** – The internal audit program requires regular documented inspections to verify GMP's and site standards. Where corrective or preventive actions are implemented, these shall be documented alongside the inspection.
10. **Manufacturing Module 11** – Updates and clarification to module 11 requirements help ensure practices to prevent microbiological cross-contamination and allergen cross-contact.

About TUV USA, Inc.

TUV USA, Inc. certifies against the Safe Quality Foods (SQF) Code in all categories and is an accredited and licensed certification body for the BRC Global Standards. [Contact us](#) for more information about our food safety services. Click [here](#) to subscribe to our monthly newsletter.

About the Author

Lori Carlson is an independent technical writer, trainer and consultant for the food and beverage industry with a background in food safety management systems, GFSI benchmarked schemes and regulatory compliance.