EAGLE Certification Group
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SQF Edition 8

October 23, 2017

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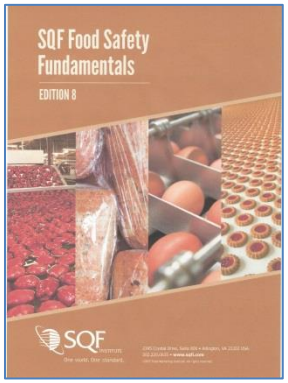
Objectives

- Overview of changes to SQF Code version 8- food safety and quality codes
- New component of Code: Food Fraud
- Regulatory compliance (ties in with FSMA requirements)
- Corrective Actions – required parts and expectations

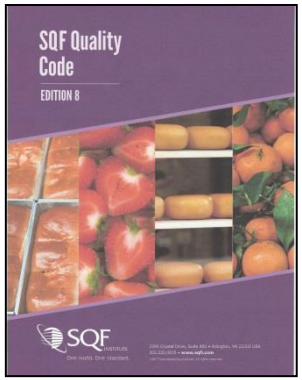
Structure of SQF Codes Edition 8

Level 1



Level 2

Level 3



January 2nd -- Full Implementation of Edition 8

- Edition 8 will be fully implemented and apply to all desk audits, site certification, and re-certification audits, and surveillance audits conducted on January 2, 2018, or later.
- If the initial certification audit commences with the desk audit prior to January 2, 2018, and the certification-site audit is scheduled for on or after January 2nd, the desk audit shall be conducted to edition 7.2, and the site audit to edition 8, with the additional edition 8 documents audited during the site audit.
- Surveillance audits conducted on or after January 2nd shall be audited against edition 8 of the SQF Code, using the version of the Code that the facility site was certified to or recertified against.

Edition 8 Changes

Food Safety Fundamentals

- Formerly Level 1
- Entry level for new business
- HACCP not required- Not GFSI benchmarked

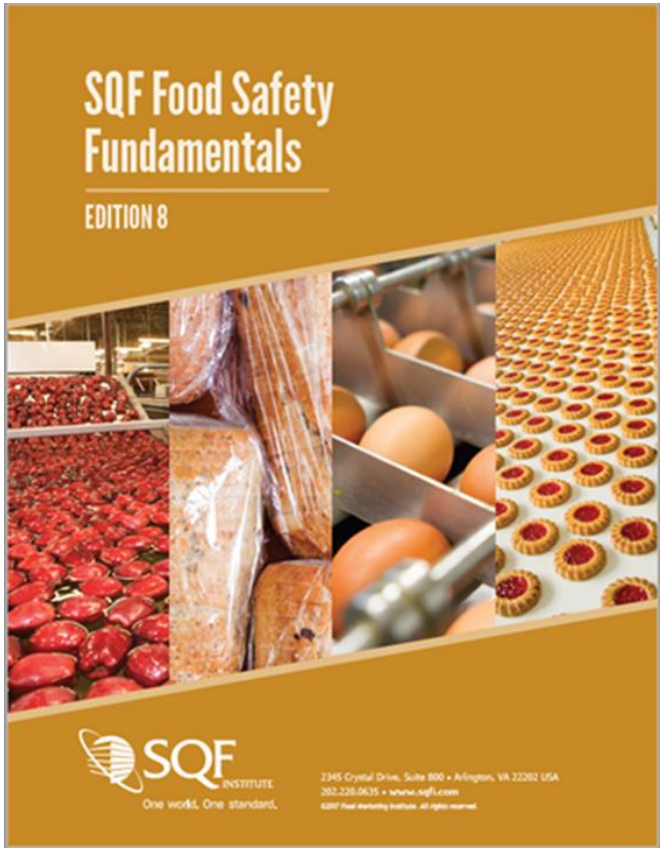
Food Safety Code

- Formerly Level 2
- Primary Production- FSCs: 1, 3, 5, 6
- Manufacturing- FSCs: 4; 7-22; 25*; 31-34
- Storage and Distribution- FSC: 26
- Manufacture of Packaging Materials- FSC: 27
- Retail- FSC: 24- NEW

Quality Code

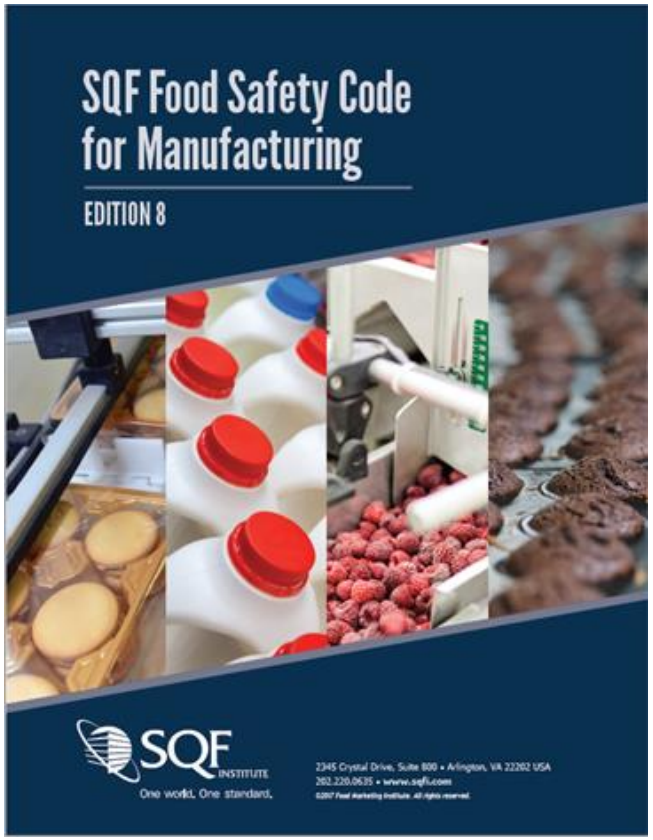
- Formerly Level 3
- System elements specific to quality
- Can be conducted with or without the food safety audit
- Results will not affect the score of the food safety audit
- Not available for Food Retail

SQF Food Safety Fundamentals



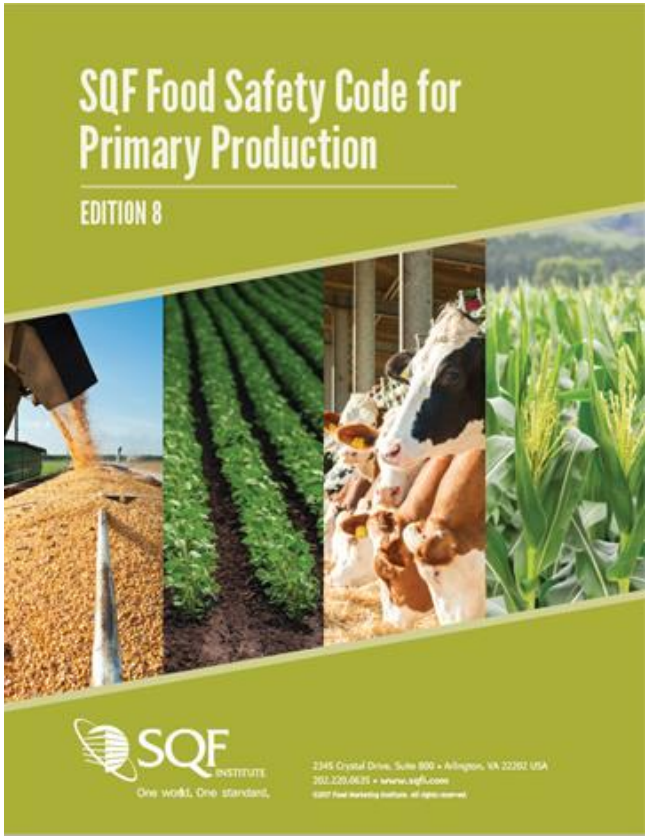
- Formerly Level 1
- Applies to manufacturing of food and food packaging, primary production and distribution (GMP, GAP and GDPs). Modules 7, 11, 12 and 13 included.
- Removed requirement to have SQF practitioner attend HACCP training
- Changed system element
- HACCP not required
- NOT GFSI benchmarked

SQF Food Safety Code for Manufacturing



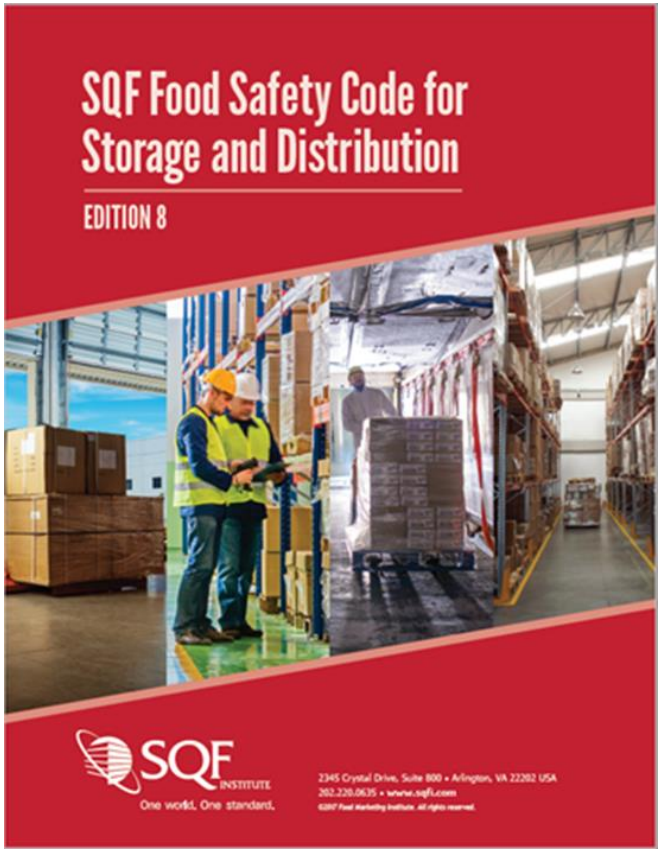
- Separate Part A and system elements
- Covers produce pack house, slaughterhouses, all food manufacturing, and the manufacture of animal feed and pet food (FSCs 4; 7-22; 25; 31-34)
- Applicable GMP modules are 3, 4, 9, 10 and 11
- Will be submitted to GFSI v 7 for benchmarking

SQF Food Safety Code for Primary Production



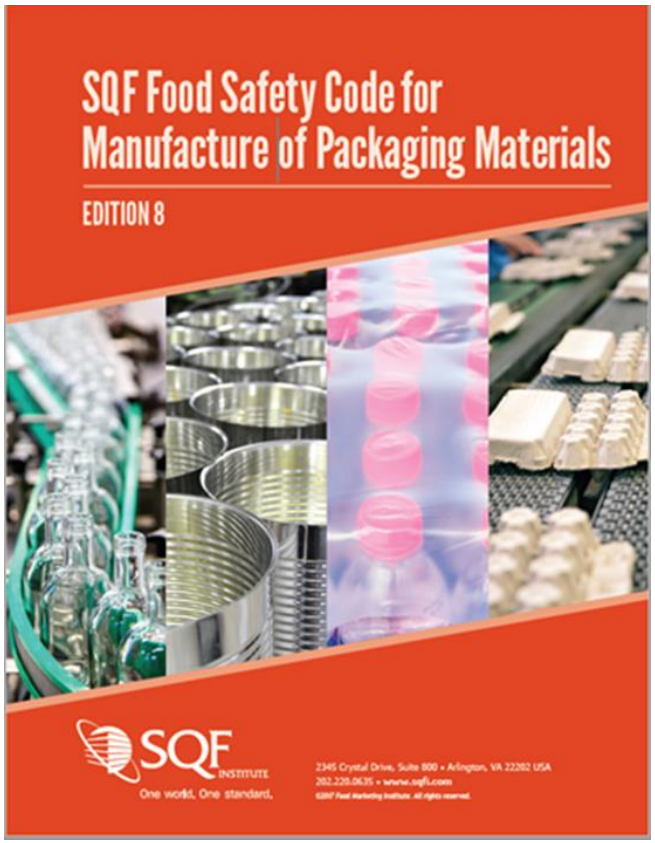
- Separate Part A and system elements
- Covers all pre-farm gate activities: livestock, produce, aquaculture (FSCs 1, 2, 3, 5, 6)
- Applicable GMP modules are 5, 6, 7, 7H, 8
- Will be submitted to GFSI v 7 for benchmarking

SQF Food Safety Code for Storage & Distribution



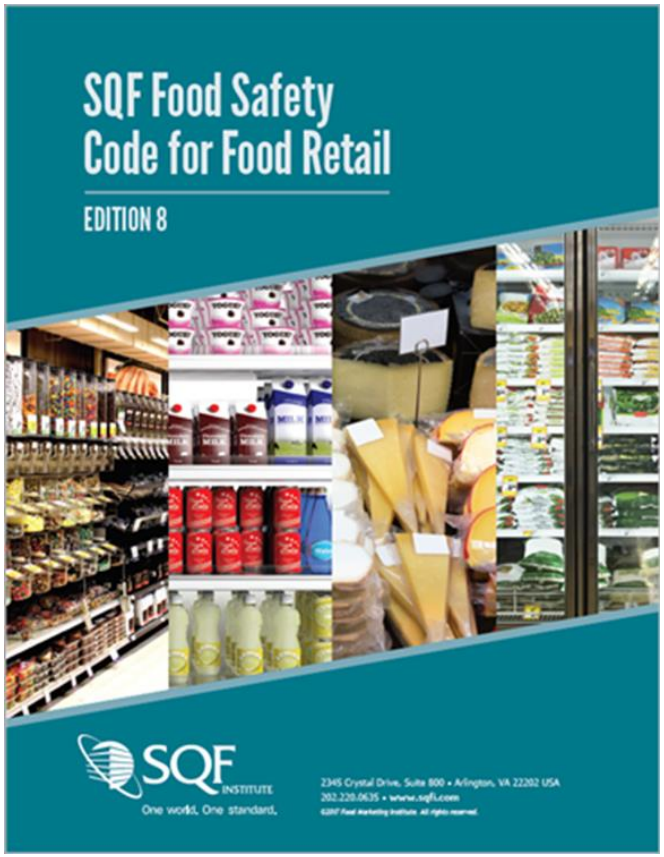
- Separate Part A and system elements
- Covers the system elements, and Good Distribution Practices for the transport, storage and distribution of perishable and non-perishable food and feed products
- Applicable GDP module is module 12
- Will be submitted to GFSI v7 for benchmarking

SQF Food Safety Code for Manufacture of Food Packaging



- Covers the system elements, and Good Manufacturing Practices for the manufacture of food packaging.
- Addresses items that may be used in food manufacturing or food service facilities (e.g. paper towel, napkins, disposable food containers, straws, stirrers)
- Applicable GDP module is module 13

SQF Food Safety Code for Food Retail



- NEW standard
- System elements are very different from those in the other Food Safety Codes
- Covers the system elements, and Good Retail Practices for retail, wholesale and grocery
- Corporate and store level audit
- Multi-site option
- Covers FSC 24

Part A Update - Food Safety

- **Added** requirement for all operational and cleaning shifts and pre-operational inspections, where applicable
- Option for corporate audits
- **New** mandatory elements
  - Complaint Management (all scopes)
  - Allergen Management (manufacturing, storage and distribution, manufacture of food packaging)
- **Changed** corrective actions close out timeframe
  - Minors **and** Majors- close out in 30 days
- **Removed** OIPs as a response

Part A Update- Food Safety

- Unannounced audit protocol remains the same however--
  - **Added** protocol for voluntary annual unannounced audit
  - Recognition on the certificate
- Surveillance audit following suspension is now termed as an on-site visit and is unannounced
- Withdrawn sites are posted on sqfi.com for 12 months
- Withdrawn sites are required to wait 12 months before reapplying for certification
- **New** section on compliance
- Re-defined requirements for technical experts
- Re-designed food sector categories for clearer identification of industry scopes

Edition 8 Changes- FSC

FSC	Change
FSC 2- Growing and Harvesting of Animal Feeds	Combined with FSC 34
FSC 3- Growing and Production of Fresh Produce and Nuts	Added Nuts to the FSC description
FSC 4- Fresh Produce and Nuts Pack house Operations	Added Nuts to the FSC description
FSC 11- Honey Processing	Added apiculture to the FSC description
FSC 15- Canning	Added HPP to description
FSC 19- Food Ingredient Manufacture	Added dry coffee and tea to description
FSC 24- Food Retailing	Added system elements and module 15
FSC 25- Repackaging of products not manufactured on site	New FSC for assembling of whole produce and packaged products
FSC 26- Food Storage and Distribution	Single FSC for both general and produce storage
FSC 28, 29, 30	Not in use
FSC 35- Brokers	Eliminated

Manufacturing System Elements - Key Changes

- **Changed** to “site” rather than “organization”, “supplier”, or “facility”
- 2.1 Emphasis on Senior Management:
  - **New** element on change management
  - Emphasized site management responsibility for training and communication
  - Require monthly meetings between Senior Management and the SQF practitioner
  - Blackout periods now included in system elements, to allow auditor opportunity to check designated blackout dates
- 2.1.5 “Business Continuity Planning” is now “Crisis Management Planning”. More detailed requirements
- 2.4.3 Significant detail around the food safety plans. New element to require regulatory controls as well as CODEX
- 2.4.4 **New** element on food fraud (2.4.4.5, 2.4.4.6) and food defense (2.4.4.4) plan required for incoming materials

Manufacturing System Elements - Key Changes

- 2.4.8 Environmental monitoring **added** as a system elements (was formerly within the GMP module).
- **New** element regarding product start-ups and changeovers (2.6.1.3)
- 2.7 **New** food fraud requirement
  - Vulnerability assessment, mitigation plan, record review required
- 2.8 ID Preserved Foods moved to the SQF Quality Code
- Clearer Allergen Requirements
  - 2.8.1 Allergen management split into several distinct elements (2.8.1 - Mandatory). Allergen Management for pet food moved to 2.8.2 (Mandatory) and for feed 2.8.3 (non-mandatory).
  - 2.8.1.1 **Added** "The allergen management program shall include the identification, management, and labelling of products containing gluten, where applicable".

Food Fraud Requirements 2.7

- **Food Fraud:** 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.
- **Food Fraud & Food Defense are listed in both the Manufacturing Code and the Quality Code**

In SQF Manufacturing Code:

- 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 or ingredient substitution, mislabeling, dilution and counterfeiting which may adversely impact food safety.
- 2.4.4.6 The food fraud mitigation plan (refer to 2.7.2.2) shall include methods by which the identified food safety vulnerabilities from ingredients and materials shall be controlled.

Food Fraud Requirements 2.7

2.7.1 Food Defense Plan (Mandatory)

- 2.7.1.1 The methods, responsibility and criteria for preventing food adulteration 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, ingredients, packaging materials, work-in progress, process inputs and finished products 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.

Food Fraud Requirements 2.7

2.7.1 Food Defense Plan (Mandatory) *(continued)*

- 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, dilution, counterfeiting or stolen goods which may adversely impact food safety.
- 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

Food Fraud Requirements

In SQF Quality Code:

- 2.7 Food Fraud
- 2.7.1 Food Fraud Vulnerability Assessment
- 2.7.1.1 The food fraud vulnerability assessment shall include the site's susceptibility to ingredient or product substitution, mislabeling, dilution and counterfeiting that could adversely impact food quality.
- 2.7.1.2 A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities that could adversely impact food quality shall be controlled.

Food Fraud Requirements 2.7

- What is a Food Fraud Vulnerability Assessment?
- The vulnerability assessment must be documented and identify hazards that may be present in the food because they occur naturally, are unintentionally introduced, or are intentionally introduced for purposes of economic gain, and can be a public health risk if not addressed.
- The assessment will determine if there are hazards and which need preventive controls.

Food Fraud Requirements 2.7

- What is a Food Fraud Mitigation Plan?
- This is a documented control plan to manage the food fraud hazards identified in the vulnerability assessment. The measures the site has developed to manage the risks must be written.
- For more information on Food Fraud related to SQF and GFSI, visit **www.FoodFraud.msu.edu**

Manufacturing System Elements - Key Changes

Pest Control

- 11.2.7 **Changed** 'vermin' to 'pests' and 'flies' to 'insects'
- 11.2.7.2 (external personnel access areas) **Added** "to protect against ingress of dust, vermin and other pests"
- 11.2.7.4 "Poison rodenticide bait" rather than "poison bait"
- 11.2.12.1 **Changed** "integrated pest management' to "pest prevention".
- 11.2.12.2 **New** element regarding pest activity
- 11.2.12.3 **New** element regarding Records of the disposal, investigation, and resolution of pest activity.

Manufacturing System Elements - Key Changes

Equipment, cleaning and sanitation

- 11.2.9.1 **New** element regarding specifications for equipment, utensils and protective clothing.
- 11.2.9.2 Equipment design and construction to "meet applicable regulatory requirements"
- 11.2.9.4 (Product containers) **Added** “and readily cleaned as per 11.2.12”.
- 11.2.9.2 **New** element re: cleaning of equipment, utensils and protective clothing at a frequency to control contamination"
- 11.2.10.8 **New** element regarding temporary repairs.
- 11.2.10.9 Pre-operational inspection conducted after maintenance.
- 11.2.13.8 Detergents and sanitizers to be “labeled according to regulatory requirements"
- 11.2.13.9 **New** element regarding detergent mix concentrations.

Manufacturing System Elements - Key Changes

Personnel

- 11.3.1.2 **New** element regarding contamination caused by bodily fluids.
- Reference to first aid facilities removed.
- 11.3.5.5 **New** element about visitors. They shall be trained "or shall be escorted at all times in food processing, handling and storage areas."
- 11.3.9.1 (Toilets) **Added** "Include an area inside or nearby, for storing protective clothing, outer garments and other items while using the facilities"
- 11.3.10.3 **New** element about outside eating areas.

Manufacturing System Elements - Key Changes

Water and Air Quality

- 11.5.4.2 **New** element. Water used in processing shall be tested, and if required, treated.
- 11.5.4.2 (Water Analysis) now includes " Samples for analysis shall be taken from within the facility. The frequency of analysis shall be risk-based, and at a minimum annually."
- 11.5.5.2 (Compressed air) now includes other gases.
- 11.5.5.2 (Compressed air systems) Replaced "microbiological purity" with "applicable food safety hazards"
- **Storage and Handling**
- 11.6.1.1 **New** element requires a storage plan.
- 11.9.1.5 **New** element on controlled disposal of trademarked material.
- 11.9.1.6 **New** element on waste for animal feed.

Primary Production System Elements - Key Changes

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- System elements for primary generally follow manufacturing
- 2.2.1.1 "Include or reference the written procedures (Good Agricultural Practices and/or Good Production Practices) and other documentation necessary to support the development, implementation, maintenance and control of the SQF System.
- 2.3.2.2 Country of destination added.
- 2.3.1 **Removed** shelf-life study requirements for new products and **added** reference to primary production parameters (e.g. MRL's)
- 2.3.4 Consolidated requirements for Contract Manufacturers and simplified language.

Primary Production System Elements - Key Changes

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- 2.4.2 **Changed** title to GAP rather than 'fundamentals' for clarity and consolidated requirements by removing references to pre-requisite's.
- 2.4.3 **Added** specific reference to HACCP-based model usage and requirements
- 2.4.5.1 Revised and simplified requirements for non-performing products
- 2.8.1.1 Allergen Management requirements consolidated and simplified for application to primary production

Primary Production System Elements - Key Changes

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- 7.3.2.1 **Added** potable water requirement to handwashing requirements
- Revised language throughout to remove reference to processing and manufacturing and replace with operations and/or product handling.
- 7.2.2 **Changed** header from “Glasshouses and Hydroponics” to “Greenhouses, Hydroponics and Mushrooms”
- 7.2.3.1 **Added** design and clarification to controlled atmosphere storage as well as to 7.2.3.7 & 7.2.3.8.
- 7.2.9 **Changed** name from “Pest and Vermin Management” to “Pest Prevention”
- 7.2.9.2 **Added** pest trending requirement
- 7.2.10.2 **Changed** exclusion of domestic and wild animals from growing fields to control of them

Primary Production System Elements - Key Changes

- 7.3.2.2 **Added** requirement to wash hands before putting on gloves
- **Removed** First Aid requirements
- 7.4 Moved Pre-Harvest Assessment and Foreign Matter and Glass Procedures from 7.8 to be included under Harvesting and Field Practices.
- 7.4.3.1 **Added** additional requirements to personal practices for field packing
- 7.6.2 Consolidated requirements for Transport
- 7.7.2.1 **Added** requirement for no raw untreated manure usage
- 7.7.4.3 **New** element for chemical application requirements that was split from chemical applicator requirements
- 7.8.1.2 **Added** controlled disposal of trademarked material.

Storage & Distribution Systems Elements – Key Changes

- System elements for storage and distribution generally follow manufacturing
- 2.3 Specification and Contract Services
- 2.3.1 Product handling requirements for products intended for distribution
- 2.3.2.1 Product descriptions used rather than specifications.
- 2.3.4 Contract Third Party Storage or Distributor modified to address storage and distribution
- 2.4.3 **Added** HACCP based approach
- 2.4.8 Environmental monitoring – NOT applicable for Storage and Distribution
- 2.8.1.1 Allergen Management requirements consolidated and simplified for application to storage and distribution

Storage & Distribution Module 12 – Key Changes

- 12.2.11 **Removed** reference to pre-op in cleaning and sanitizing
- 12.3.1.2 **New** element regarding contamination caused by bodily fluids.
- 12.3.1.3 **Removed** reference for employees exposed cuts, sores or lesions from engaging in handling packaging materials.
- 12.3.1.4 **Added** requirement that drinking is allowed in the facility following appropriate conditions.
- 12.3.2.2 Clarified that the hand dryer may be used in instances where there is no direct hand contact of food or food contact surfaces.
- 12.3.5.5. **New** requirement for driver personnel requirements.

Storage & Distribution Module 12 – Key Changes

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- 12.4.1.1 Clarified that the wearing of false fingernails, false eyelashes, eyelash extension, long nails or fingernail polish is not permitted when handling food; and hair restraints are used where product is exposed.
- 12.5.2 **Deleted** reference to washing, thawing and treating foods and clarified that ice that is used for contact with food.
- 12.5.4 **Deleted** the reference for ice used in processing operations.
- 12.6.1 **New** requirements for general storage and handling requirements.
- 12.6.1.2 / 12.6.1.3 Stock rotation included from system elements
- 12.6.5.1 Provided clarification on the differences between chemicals used on site vs stored for distribution and sale.

Storage & Distribution Module 12 – Key Changes

- **Added** receiving requirements rather than unloading practices
- 12.6.7.2 **New** requirement for trailer wash
- 12.6.7.3 **New** element: Practices shall be in place for loading, transport and unloading receiving to protect against the contamination from biological, chemical and physical risks.
- 12.6.7.5 **New** element: Sites shall have a procedure in place that Is documented and implemented to ensure trailers are inspected prior to receiving shipments or loading to ensure that the trailer is in good repair, clean, secured and at required environmental conditions and temperatures.
- 12.6.8 **Added** staging requirements
- 12.7.2 **New** requirements for receiving

Mfg of Food Packaging Systems Elements – Key Changes

- System elements for manufacture of food packaging generally follow manufacturing
- Clarified the application of the Code is to the manufacture of food packaging
- Reference to materials to raw materials; reference to ingredients removed
- **New** element: 2.3.1.3 for packaging used to provide a functional effect on food
- 2.3.1.5 **Eliminated** reference to shelf life trials; **Added** requirement for records and validated storage conditions
- 2.3.1.7 **New** element for the approval of artwork for primary and secondary packaging
- 2.3.2.2 Packaging with product ingredient lists(s), allergens, identification codes, etc., shall be managed in a manner that prevents misprinting.

Mfg of Food Packaging Systems Elements – Key Changes

- 2.3.2.5 **Removed** reference to validation of packaging material
- 2.3.5.1 Modified to include Product ingredient lists(s), allergens, identification codes, etc.,
- 2.4.1.1 **Removed** reference to requirements not applicable to food packaging
- 2.4.6.1 **Added** that reworked product is processed in a manner that does not contaminate raw materials or food packaging materials
- 2.4.6.2 **New** element on the handling of post-consumer recycling
- 2.4.6.3 Information shall be handled in a manner that prevents mixed up or intermingled product.
- 2.6.1.1 Included recycled material
- 2.4.8 Environmental monitoring **added** as a requirement

Mfg of Food Packaging Systems Elements – Key Changes

- 2.5.4.2 **New** element for product testing
- 2.5.4.4 **New** element for procedures in place for managing and verifying correct printing plates, anilox rollers, cylinders are used during printing.
- 2.5.4.5 **New** element for procedures in place for effective storage of printing plates, cylinders and print blankets and identifying miss-prints
- 2.6.3 Re-worded to follow the packaging manufacture industry role in recalls
- 2.8.1.1 Allergen Management requirements consolidated and simplified for application to the manufacture of food packaging

Mfg of Food Packaging Module 13. Key Changes

- Customized throughout to fit with the manufacture of food packaging
- 13.2.2.1 **Added** 'fit for purpose' for floors
- 13.2.11.3 **New** element to cleaning and sanitation to protect adjacent production equipment during cleaning if using compressed air hoses.
- 13.2.11.4 **Deleted** reference to pre-operational inspections
- 13.2.11.7 **Deleted** reference to cleaners and sanitizers and replaced with cleaning agents.
- 13.3.1.4 **Added** that drinking water is permissible
- 13.3.5.3 **New** element for training visitors on site hygiene policy

The SQF Food Safety Code for Food Retail

- Review of the Retail operation from the corporate function to execution at the store level
- Corporate Audit
  - An independent review of the Organization's SQF System documentation
  - First stage for the initial Certification audit
  - Ensures the system and system documentation substantially meet the requirements of the SQF Code

The SQF Food Safety Code for Food Retail

- Store Audit
  - Conducted onsite by the auditor appointed by the CB and agreed upon by the organization
  - Conducted at a time when main processes are operating or when product is in season
  - For seasonal organizations, initial certification is conducted during peak operation part of the season
  - Must include a review of the entire store to determine impact on product being evaluated.

System Elements, Part A, 2.9

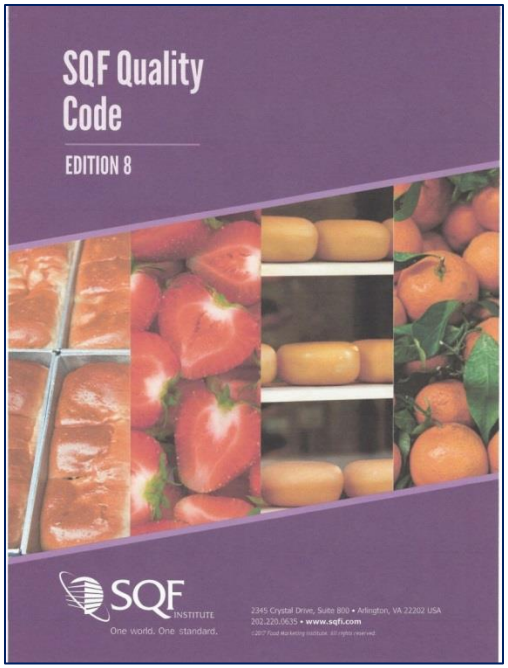
- 2.1 Management Commitment
- 2.2 Document Control & Records
- 2.3 Specification & Products
- 2.4 Attaining Food Safety
- 2.5 SQF System Verification
- 2.6 Product Information, Trace, Serious Incident Management
- 2.7 Food Defense
- 2.8 Training

Module 15 Overview:

- 15.1 Site Requirements & Approval
- 15.2 Construction, Control of Product Handling, Storage and Sales Area
- 15.3 Personnel Hygiene, Welfare & Personnel Processing Practices
- 15.4 Storage, Transport & Separation of Functions
- 15.5 Water & Ice
- 15.6 Waste Disposal
- 15.7 Receiving & Transportation

SQF Quality Code - Summary

- Formerly level 3
- Sites must remain certified to the SQF Food Safety Code
- Can be audited as an extension of the food safety audit or stand-alone
- Quality audit is not scored or rated
- Outcome of the quality audit does not affect the score or rating of the food safety audit



Outline of the SQF Quality Code

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Part A

1. Preparing for SQF Quality Certification
2. The Initial Quality Certification
3. The Initial Certification Decision
4. Recertification
5. Obligations of Sites and Certification Bodies

System Elements

2.1 Management Commitment
2.2 Document Control and Records
2.3 Specification and Product Development
2.4 Food Quality System
2.5 Food Quality System Verification
2.6 Product Identification, Trace, Withdrawal and Recall
2.7 Food Fraud
2.8 Identity Preserved Foods
2.9 Training

Outline of the SQF Quality Code

Part A: Implementing and Maintaining the SQF Quality Code

To meet the requirements of the SQF Quality Code, sites shall:

i. Be certified to one of the following:

The SQF Food Safety Code for Primary Production;

The SQF Food Safety Code for Manufacturing;

The SQF Food Safety Code for Distribution;

The SQF Food Safety Code for Packaging;

ii. Apply all additional elements of the SQF Quality Code.

Outline of the SQF Quality Code

Part A 1: Preparing for Certification

1.1 Achieve SQF Food Safety Certification

1.2 Learn about the SQF Quality Code

1.3 Register in the SQFI Assessment Database

1.4 Designate an SQF Quality Practitioner

1.5 SQF Quality Systems Training

1.6 Document &Implement - SQF Quality Code

1.7 Select a Certification Body

1.8 Conduct a Pre-assessment Audit

1.9 Multi-site Programs

Whether or not an SQF consultant is used, the SQF Quality Code requires that every site has a suitably qualified **SQF Quality Practitioner** to oversee the development, implementation, review and maintenance of the SQF quality system, including the food quality plans.

System Elements 2.1.2.4

Senior site management shall designate an SQF Quality Practitioner for each site with responsibility and authority to:

i. Oversee the development, implementation, review and maintenance of the SQF Quality System;

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

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

iv. Ensure that site personnel have the required competencies to carry out those functions affecting product quality.

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System Elements 2.1.2.5

In addition to the SQF Food Safety Code requirements, the SQF Quality Practitioner shall:

i. Be competent to implement and maintain HACCP based food quality plans;

ii. Have an understanding of the SQF Quality Code and the requirements to implement and maintain a quality management system; and

iii. Be competent in statistical process control (SPC) and/or other quality tools to reduce process variation and drive root cause analysis of non-conformities.

Part A, 1.9

The SQF Quality Code is only available to central sites that participate in an SQF multi-site program. It is not available for sub-sites.

2.2 Identifying the Scope of Certification

- The site and products shall be the same as the site's certification to the SQF Food Safety Code.
- Any agreed exemptions from the food safety certification shall also be exempted from the quality certification
- The scope of quality certification shall not be extended or changed from the food safety certification.
- The scope of certification cannot be changed during or immediately following a certification audit to the SQF Quality Code.
- Exempted parts of the site shall not be promoted as being covered by the certification to the SQF Quality Code.

2.3 The Initial Certification Audit

The certification audit can be**:**

- Either an extension of an existing certification or recertification audit to the SQF Food Safety Code. In this instance, certification to the SQF Quality Code shall only be granted on successful certification or recertification to the SQF Food Safety Code
- Or a stand-alone audit conducted at any time during the currency of the site's certification to the SQF Food Safety Code.
- The certification audit shall, in all cases, be a combined desk and site audit

2.4 Audit Duration Guide

SQFI expects a certification audit to the SQF Quality Code, combined with a certification audit to the SQF Food Safety Code to add a minimum of half a day, while a stand-alone quality certification audit will be a minimum of one day. Report writing time is additional.

2.7 Quality Deviations

- 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.

Outline of the SQF Quality Code

Part A3: The Initial Certification Decision

3.1 Responsibility for the Certification Decision

3.2 Site Audit Corrective Actions

3.3 Audit Score and Rating

3.4 Granting Certification

3.5 Failure to Comply

The certification body is responsible for deciding whether or not certification is justified and granted based on the objective evidence provided by the SQF quality auditor.

There is no score or rating issued for SQF quality system audits.

Sites are deemed to have successfully implemented the SQF Quality Code if:

- The site achieves and maintains SQF Food Safety certification;
- The site closes out all quality deviations within thirty (30) days.

3.2 Site Audit Corrective Actions

- Sites are deemed to have successfully implemented the SQF Quality Code if:
  - The site achieves and maintains SQF Food Safety certification;
  - The site closes out all quality deviations within thirty (30) days.
- The certification decision shall be made within forty-five (45) calendar days of the last day of the quality systems audit.
- The site's unique certification number shall apply to their quality certification.

The SQF Quality Shield

- The SQF Quality Shield will appear on the certified site's quality certificate
- Certified sites may also choose to apply the SQF Quality Shield to packaging of certified products or to marketing materials
- The certification body shall provide an electronic copy of the SQF Quality Shield containing the certification body name and site certification number to the certified site on request
- The SQF Quality Shield shall only be used in accordance with the SQF Quality Shield Rules for Use

Outline of the SQF Quality Code

Part A 4: Recertification

4.1 Maintaining Quality Certification

4.2 Quality Surveillance Audit

4.3 Quality Recertification Audit

4.4 Unannounced Recertification Audit

4.5 Suspending Quality Certification

4.6 Withdrawing Quality Certification

4.1 To maintain SQF quality certification, the site is required to maintain certification to the SQF Food Safety Code, ensure that quality surveillance and/or quality re-certification audits occur within the required timeframe, and ensure that all quality deviations are corrected within the time frame specified.

4.2 Quality Surveillance Audit

- The quality surveillance audit is conducted when the site has two (2) or more major deviations and/or ten (10) or more minor deviations raised at a certification or recertification audit.
- The quality 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.

(Note that all deviations must be closed out within 30 days to achieve or maintain certification.)

4.3 Quality Recertification Audit

- The quality re-certification audit shall be conducted within thirty (30) calendar days either side of the anniversary of the last day of the initial quality certification audit.
- SQF certified sites that were Level 3 under edition 7 may select any appropriate date for their first recertification audit under the Quality Code, Edition 8, depending on whether they wish their quality audit to be conducted as an extension of their food safety recertification audit, or a stand-alone quality audit.

4.5 Suspending Quality Certification

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

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

ii. fails to take corrective action within the timeframe specified for all quality deviations, or

iii. where in the opinion of the certification body, the site fails to maintain the requirements of the SQF Quality Code.

4.6 Withdrawing Quality Certification

The certification body shall withdraw the quality certificate when the site:

i. Has been placed under suspension for it's quality certification and fails to submit approved corrective action plans within forty-eight (48) hours
ii. Fails to take approved corrective action as determined by the certification body
iii. Has falsified its records
iv. Fails to maintain the integrity of the SQF quality certificate
v. Uses the SQF Quality Shield incorrectly or while under suspension
vi. Has an administrator, receiver, receiver and manager, official manager or provisional liquidator appointed over its assets

Outline of the SQF Quality Code

2.1 Management Commitment

2.1.1	Quality Policy	2.1.2.2 The senior site management shall develop quality objectives and a process by which quality performance is measured.
2.1.2	Management Responsibility	2.1.2.7 Senior site management shall develop and implement a quality communication program
2.1.3	Management Review	2.1.2.9 Senior site management shall establish a process to trend progress in quality performance against agreed measures.
2.1.4	Complaint Management	2.1.3.2 The senior site management and SQF Quality Practitioner(s) shall meet to review the implementation and maintenance of the quality system at least monthly,
2.1.5	Crisis Management Planning	

Outline of the SQF Quality Code

Auditing Management Commitment

- Staff understanding of quality policy
- Quality objectives established
- Quality performance is measured
- Trending of quality performance
- Key personnel identified
- Competency of key personnel
- Verify Quality Practitioner
- Quality communication plan
- Coverage for absence of key personnel
- Use of Quality Shield (if applicable)
- Management review
- Change management process
- Review and resolution of customer complaints
- Crisis management planning

Management Commitment

Site Management are:

- Committed
- Involved
- Providing leadership
- Applying Quality Management Principles

Quality Management

is NOT just about managing the quality of your products and services.

Quality Management

is the quality of management of your business.

Outline of the SQF Quality Code

2.2 Document Control and Records

2.2.1 Quality Management System

2.2.2 Document Control

2.2.3 Records

The quality manual may be incorporated into, or independent from the SQF food safety manual, and shall be signed by Senior Management

2.2.1 The Quality Manual shall include:

i. A summary of the organization's quality policies and the methods it will apply to meet the requirements of the SQF Quality Code

ii. The policy statement and site organization chart;

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

iv. Finished product specifications agreed with customers, or corporate quality requirements where applicable.

v. Statistical process control methods and other quality tools that are used to control and reduce process variation.

Outline of the SQF Quality Code

2.3 Specification and Product Development

2.3.1 Product Development and Realization

2.3.2 Raw and Packaging Materials

2.3.3 Contract Service Providers

2.3.4 Contract Manufacturers

2.3.5 Finished Product Specifications

2.3.1.1 The methods for designing, developing and converting product concepts to commercial realization shall include process capability analysis to ensure that processes are able to consistently supply products that meet customer specifications.

2.3.5.1 Finished product specifications shall be documented, current, approved by the site and their customer, accessible to relevant staff and shall include product quality attributes, service delivery requirements, and labelling and packaging requirements.

2.4 Food Quality System

2.4.1 Customer Requirements

2.4.2 Quality Fundamentals

2.4.3 Food Quality Plan

2.4.4 Approved Supplier Program

2.4.5 Non-conforming Product or Equipment

2.4.6 Product Rework

2.4.7 Product Release

2.4.1 Customer Requirements

2.4.1.1 The requirements and expectations of customers and final consumers shall be continually reviewed to ensure the accuracy of specifications and the ability to supply to customer needs. A full review of customers' expectations for product and delivery shall occur at least annually.

2.4.1.2 The site shall have a procedure in place to notify essential customers where their ability to supply product that meets customer specifications is temporarily suspended or halted.

2.4.1.3 Where customer products, materials or equipment are used within the site, the site shall have measures in place to safeguard customer property and ensure it's correct and proper use.

2.4.4 Approved Supplier Program

2.4.4.2

Material suppliers shall be selected and approved on the basis of their ability to supply materials that meet quality specifications. The evaluation program shall require suppliers to:

i. Maintain controlled and current copies of specifications;

ii. Have processes that are capable of consistently supplying materials that meet specifications and other defined quality metrics (e.g. delivery, service spec adherence, etc.);

iii. Be certified to a second or third party quality management system;

iv. Have a complaints and corrective action process in place

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2.4.7 Product Release

2.4.7.1

The site shall document and implement a positive product release procedure to ensure that, at the time of delivery to its customer, the food supplied complies with all agreed customer requirements including, but not limited to, product specifications, packaging and package integrity, labelling, delivery and service requirements.

2.5 Food Quality System Verification

2.5.1 Validation and Effectiveness

2.5.2 Verification Activities

2.5.3 Corrective and Preventative Action

2.5.4 Product Sampling, Inspection and Analysis

2.5.5 Internal Audits

2.6 Product Identification, Trace, Withdrawal and Recall

2.6.1 Product Identification

2.6.1.1
Finished product shall be labelled to the agreed customer, company or corporate requirements.

2.6.2 Product Trace

2.6.3 Product Withdrawal and Recall

2.6.1.2
Product changeover procedures shall include quality attributes required to meet finished product specifications and customer requirements.

2.7 Food Fraud

2.7.1.1

The food fraud vulnerability assessment shall include the sites' susceptibility to ingredient or product substitution, miss-labelling, dilution and counterfeiting, that could adversely impact food quality.

2.7.1.2

A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities that could adversely impact food quality shall be controlled.

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2.8 Identity Preserved Foods

2.8.1.1
The methods and responsibility for the identification and processing of food and other products requiring the preservation of their identity preserved status (e.g. Kosher, HALAL, organic, GMO-free, regional provenance, free from, free trade, etc.) shall be documented and implemented.

Outline of the SQF Quality Code

2.9 Training

2.9.1 Training Requirements

2.9.2 Training Program

2.9.3 Quality Instructions

2.9.4 HACCP for Quality Training

2.9.5 Language

2.9.6 Refresher Training

2.9.7 Training Skills Register

2.9.2.1
The employee training program shall include the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with:

i. Process control and monitoring of critical quality points (CQPs);
ii. Steps identified as critical to effective implementation of the food quality plan, and
iii. Product inspection and testing.

2.4.3 Food Quality Plan

2.4.3.1

A food quality plan shall be developed, effectively implemented, and maintained in accordance with the Codex Alimentarius Commission HACCP method. The food quality plan may be combined with, or independent from, the food safety plan, but must separately identify quality threats and critical quality points.

2.4.3.2

The food quality plan shall outline the means by which the site controls and assures the quality attributes of the products or product groups and their associated processes.

Outline of the SQF Quality Code

Food Quality Plan Using the HACCP Method

Codex HACCP Methodology		SQF Food Quality Code
Step 1	Assemble the HACCP Team (and identify scope)	2.4.3.3, 2.4.3.4
Step 2	Describe the product	2.4.3.5
Step 3	Identify the intended use	2.4.3.6
Step 4	Construct the process flow diagram	2.4.3.7
Step 5	On-site confirmation of process flow diagram	2.4.3.7
Step 6 (P1)	Threat Identification, Threat Analysis and Control Measures	2.4.3.8, 2.4.3.9, 2.4.3.10
Step 7 (P2)	Determine Critical Quality Points	2.4.3.11
Step 8 (P3)	Establish Critical Quality Limits	2.4.3.12
Step 9 (P4)	Establish monitoring of CQPs	2.4.3.13
Step 10 (P5)	Establish corrective actions	2.4.3.14
Step 11 (P6)	Establish verification procedures	2.4.3.16
Step 12 (P7)	Establish documentation and record keeping	2.4.3.15

Outline of the SQF Quality Code

The Language of HACCP for Quality

SQF Food Safety Codes	SQF Quality Code
Hazard A biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect (Codex)	**Threat** An identified risk that has the potential, if not controlled, to affect the quality of a product. They do not cause illness.
Non-conformance A non-compliance raised against an element in one of the SQF Food Safety Codes, classified as either minor, major, or critical	**Deviation.** A non-compliance raised against the SQF Quality Code, classified as either minor or major.

Auditing the Food Quality Plan

- All preliminary steps are carried out
- There is a FQP team in place and active (may be the same as the FSP team)
- All quality threats are identified
- There is a protocol established for determining the significance and priority of quality threats
- CQPs are correctly determined
- Monitoring clearly indicates who, when, where and how.
- Corrective actions are clear and unambiguous
- Monitoring, corrective action and verification procedures are being followed

Principle 6 (Step 11): Verification Procedures

2.5	**Food Quality System Verification**
2.5.1	**Validation and Effectiveness**
2.5.1.1	Validation activities shall include those necessary to authenticate critical quality limits, process controls, and other quality tests established to meet customer requirements.
2.5.2	**Verification Act**
2.5.2.1	The verification schedule shall include activities designed to ensure the effectiveness of process controls and quality tests.
2.5.2.2	The methods, responsibility and criteria for verifying the effectiveness of monitoring critical quality points and other process and quality controls shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record.

Principle 6 (Step 11): Verification Procedures

2.5.3	Corrective and Preventative Action
2.5.3.1	Corrective and preventative action methods shall include the identification of the root cause and resolution of non-compliance of critical quality limits and deviations from quality requirements.
2.5.3.2	Verification activities shall include a comparison of process control limits (+/- 3σ) with specification limits to ensure alignment and appropriate process control corrections.

Principle 6 (Step 11): Verification Procedures

2.5.4	Product Sampling, Inspection and Analysis
2.5.4.1	Processing parameters or in-process measurements shall be established, validated, and verified at a determined frequency to meet all customer requirements.
2.5.4.2	On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer expectations and meet quality objectives.
2.5.4.3	Statistical process control methods shall be used to effectively control and optimize production processes to improve process efficiency and product quality and reduced waste. Control charts shall be in use for control of key processes and have defined upper and lower (process) control limits (+/- 3σ).
2.5.4.4	A sensory evaluation program shall be in place to ensure alignment with agreed customer requirements. Sensory evaluation results shall be communicated with relevant staff and with customers where appropriate.

Principle 6 (Step 11): Verification Procedures

2.5.5	Internal Audits
2.5.5.1	Internal audit plans and methods shall include food quality plans, process controls, quality tests, and other activities implemented to meet finished product specifications and customer requirements.
2.5.5.2	Staff conducting the quality internal audits shall be trained and assessed in internal audit procedures and have knowledge and experience in the quality process and process control methods as they relate to the scope of certification.

Regulatory Requirements/FSMA

- Regardless of the country location of the site being audited, the SQF audit includes clauses related to the site's compliance with their applicable regulatory requirements. In the U.S., this may include FSMA requirements, depending on the products being produced. In Canada, Canadian food safety laws will apply,
- The SQF Code does not specifically state "FSMA" because SQF is a global standard, but FSMA requirements will be evaluated during audit if the site is required to comply with FSMA.
- See SQF Code clauses # 2.1.1, 2.1.2.7, 2.4.1, 2.4.3.17, 2.6.3, 2.9.1.2, and several other clauses related to regulatory requirements of labelling of products.

SQF & Regulatory Compliance

- 2.4.1 of SQF code requires that a plant meet regulatory requirements
  - Thus they have to meet FSMA requirements if they are a FSMA-regulated facility.

- If a plant is SQF certified then they will meet approximately 85% of the FSMA law
  - On SQFI.com website – see comparison completed between SQF and FSMA
  - Auditors need to understand the differences

FSMA Requirements

- FSMA is evaluated in audit if the plant is currently required to be compliant; phase in dates vary by size of site and FSMA law.
  - If the site is not complying or lacking a key requirement, a non-conformance will be issued on the SQF audit.

- If the plant does not currently need to comply with FSMA until a later date, then any issues observed can be discussed in closing meeting.

FSMA Requirements

- What areas should we evaluate to determine level of compliance to FSMA?
  - Is a Preventive Control Qualified Individual identified?
    - Are they competent?
    - They do not need to complete official training but even if they did competency needs to be evaluated.
  - Evaluate Preventive Control Hazards
    - HACCP still required by SQF code
    - PC will include process steps which may be their CCPs.
    - Other PCs may include items traditionally considered as Prerequisite Programs

FSMA Requirements

- Evaluate Preventive Controls
  - Examples of PC may include sanitation, allergen, environmental programs, supplier program
  - If they have allergens in their facility a PC should be identified.
- Food Safety records must be reviewed in 7 days
  - How does the plant document this review?
  - Is the review done in 7 days?
  - Who can do the review? Anyone who is trained as long as PCQI has oversight.
  - What type of records? Records related to monitoring, verification and validation of PCs. Also may include supplier records (audits, COAs, LOGs)

FSMA Requirements

- Record retention is required to be two years minimum.
- Training required for all employees in food safety and hygiene
- If site audits their suppliers – must be a qualified auditor

These are the main differences that have to be looked at separately.

Corrective Action Components

- Parts of a Corrective Action Response:
  - Containment/Correction
  - Root Cause
  - Corrective Action Plan
  - Objective Evidence
  - WI 214 Food (Appendix A) - contains more detailed definitions of each part of the expected corrective action response.

- Closing with Extensions

Parts of Corrective Action Reponses

- Containment/Correction
  - Immediate fix for nonconformity
  - Not required as part of SQF corrective action response

- Root Cause
  - Should provide a systemic reason for why the nonconformity occurred, and if addressed in corrective action, will prevent reoccurrence
  - Should not be a restatement of the nonconformity

Parts of a Corrective Action Response

- Corrective Action
  - Should address how the nonconformity will be prevented in the future
  - Systemic change
  - May include correction, but should address the system as a whole and not just the immediate fix for the nonconformity issued

- Objective Evidence
  - Evidence to show that the corrective action plan has been implemented
  - May include training logs, updated policies/procedures, pictures, etc.

Closing with Extensions

- Closing with Extensions
  - A corrective action requiring capital investment or prolonged construction/work , may be closed with extensions
  - What should be submitted for this type of corrective action?
    - Immediate fix that was implemented to mitigate the risk from nonconformity until permanent corrective action can be completed
    - Signed letter of management commitment to complete full corrective action, and a timeline in which it will be completed.
    - Quotes/work orders for full corrective action

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Questions?

EAGLE's Technical Team is available to answer any questions you have about SQF edition 8.

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