



Food Safety

## SQF Edition 8 Cheat Sheet

### Food Safety Fundamentals - Formerly Level 1

- Entry level for new business
- HACCP not required- Not GFSI benchmarked
- 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 changes effected in manufacturing

### Food Safety Code - Formerly Level 2

- Primary Production- FSCs: 1, 3, 5, 6
  - 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
- Manufacturing- FSCs: 4; 7-22; 25\*; 31-34
  - 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 9, 10 and 11
- Storage and Distribution- FSC: 26
  - 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
- Manufacture of Packaging Materials- FSC: 27
  - 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
- Retail- FSC: 24- NEW
  - 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

### Quality Code - Formerly Level 3

- System elements specific to quality
- Not available for Food Retail
- 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



Food Safety

### Edition 8 Timeline

Release SQFI, Edition 8	March 31, 2017 – posted to sqfi.com
Code change documents	Week of April 10 <sup>th</sup> – posted to sqfi.com
Instructor led training (implementing food safety and quality systems) through SQF licensed training centers	May, 2017 – available at a licensed SQFI training center
Guidance documents for manufacturing, primary, storage and distribution and manufacture of food packaging	July, 2017 – posted to sqfi.com
Release of updated criteria documents (auditor, quality auditor, CB)	July, 2017 – posted to sqfi.com
Update current SQFI online training for implementing SQF	September, 2017 – available online through sqfi.com
SQFI Online Quality Code course	September, 2017 – available online through sqfi.com
Implementation date	January 2, 2018



Food Safety

### 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 to corrective actions close out timeframe
- Minors and Majors- close out in 30 days
- Removed OIPs as a response
- Unannounced audit protocol remains the same however--
- Added protocol for voluntary annual unannounced audit
- Recognition on the certificate
- Surveillance audits 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-design food sector categories for clearer identification of industry scopes

### Edition 8 Changes - FSC

FSC	Changes
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 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



Food Safety

### Key Changes - System Elements

- Changed to "site" rather than "organization" "supplier" or "facility" throughout.
- 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
- 2.4.8 Environmental monitoring added as a system elements (topic was in 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 and for feed 2.8.3.
  - 2.8.1.1 Added "The allergen management program shall include the identification, management, and labelling of products containing gluten, where applicable".
  - 2.8.2 Allergen Management for pet food is also mandatory
  - 2.8.3 Allergen management for animal feed is not mandatory.

### Key Changes - Primary System Elements

- 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.
- 2.4.2 Changed title to GAP rather than 'fundamentals' for clarity and consolidated requirements by removing references to pre-requisite.
- 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



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### **Key Changes - Storage and Distribution System Elements**

- 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

### **Key Changes - Manufacture of Food Packaging System Elements**

- 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.
- 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
- Manufacture Food Packaging System Elements:
- 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
- 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



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### **Key Changes - 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
- 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.
- Section provides an overview of Module 15: Good Retail Practice requirements for the receiving, storage, processing, display for sale and delivery of food at the store(s) within the RWG Code.
  - 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

### **Food Retail System Elements**

- 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



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### **Key Changes - Module 7**

- 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
- 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.



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## **Key Changes - Module 11**

- **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.
- **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.
- **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.
- **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.





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### **Key Changes - Module 12**

- 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.
- 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.
- 12.6.7 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.



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### **Key Changes - Module 13**

- 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



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### **Key Changes - Quality Code**

- Independent of the SQF Food Safety Codes. Sites must be certified to one of the SQF Food Safety Codes. The SQF Quality Practitioner can be the same as, or different from the SQF Practitioner.
- Auditors must be trained to the Quality Code.
- Can be combined with, or independent of, the SQF Food Safety Audit.
- Audit duration may vary
- There are no 'mandatory' elements. All elements are 'as applicable'.
- Major and minor quality deviations (not called non-conformances). There are no 'critical' deviations. The quality audit is not scored or rated.
- Successful completion of the quality audit if all deviations are closed out within 30 days.
- Surveillance audit conducted for 2 major and/or 10 minor quality deviations.
- No unannounced audits, except where a quality audit is combined with an unannounced food safety audit.
- Based off the system elements for food safety.
- 2.1.2.5 Additional requirements for SQF Quality Practitioner - competent in SPC and/or other quality tools.
- 2.1.2.7 Quality communication program
- 2.1.2.9 Benchmarking of quality performance
- 2.1.4.1 Requirement to resolve as well as identify quality complaints.
- 2.1.5.2 Customer contact in the event of a crisis that affects supply.
- 2.2.1.1 Quality system manual to include statistical process control methods and other applicable quality tools.
- 2.3.1.1 Commercial realization to include quality considerations.
- 2.3.1.2 Validation of product formulation and manufacturing processes.
- 2.3.4.2 Contract manufacturers to be included in quality system requirements.
- 2.3.5.1 Finished product specifications include service quality requirements.
- 2.4.1.1 Continual review of customer requirements and expectations.
- 2.4.2.3 Storage and transport emphasizes minimizing loss, waste, or damage.
- 2.4.3.1 In the Food Quality Plan, threat = hazard. It is controlled at a CQP.
- 2.4.3.2 Detailed requirements for food quality plan as per Codex twelve steps.
- 2.5.4.3 Use of statistical control methods to optimize production processes.
- 2.7.1.1 Food fraud includes quality parameters.