Important Information on Maintaining

SQF

Certification
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Now that your organization has achieved certification to the SQF Code it is essential that strategies are in place to maintain your certification and avoid any risk of suspension or withdrawal of certification at future audits.

Following are some of the requirements and suggestions to assist in the maintenance of your SQF system.

Keeping Informed

Achieving SQF certification is the first step on the journey.   Maintaining certification in future years is by far the greatest challenge your organization faces.

While SQFI and Mérieux NutriSciences Certification LLC ("MNCertification") will make every attempt to keep you informed of significant updates, it is highly recommended that you visit the website at www.sqfi.com frequently to and familiarize yourself with the range of information and resources available to you.

Unlike a number of other international Standards, SQFI have provided all documents on the site free of charge.

Another site that you may wish to include in your library is the Global Food Safety Initiative website www.mygfsi.com

Like many similar websites, GFSI offer a subscription service for automatic newsletters and updates

SQF Assessment Database

This is the primary tool that SQFI have developed to assist Suppliers, Certification Bodies, Auditors, Consultants and Buyers to obtain and manage information related to SQF certification. You would have gained some experience in the use of this database during your registration and certification process.

Whilst we, as a Certification Body cannot enforce use of the database we do strongly recommend that relevant personnel within your organization are trained and competent in its use.

All users have a username (email address) and password to ensure confidentiality is maintained at all times.

You also may wish to consider including a verification of your company's information as part of your periodic Food Safety and Quality Management Review process.
SQFI has authorized a number of their approved Training organizations to provide training in the use of the SQF Assessment Database. MNCertification is one such Training body however, a full list can be found on the SQFI website.

The SQFI Certified Suppliers Register

Your Company details have already been entered into the SQFI Register of Certified Companies. The register can be located on the SQFI website www.sqfi.com under "Suppliers."

At a minimum the information on the register includes:

- ➢ Your company Name
- ➢ The State and Country in which you operate
- ➢ Company Address
- ➢ Your SQF certification details –Food Sector Category, Product(s), Certification level, etc.
- ➢ Audit Rating
- ➢ Certificate Expiration Date

This information may be utilized by retailers and other prospective customers to verify your certification or to search for potential suppliers to service their needs.

Please ensure you periodically review and if necessary update your contact information in the ReposiTrak Database. If changes need to be made to your SQF Certificate, please

contact us with this information as the SQF Certified Supplier Register is pulled from from the data within your audit report & SQF Certificate.

Providing Additional Access For Your Customers

While the SQFI Certified Suppliers Register may be a valuable tool for marketing your products to prospective customers a number of your current customers may require you to provide additional access to your certification details and SQF audit reports.

Of course any decisions regarding the level of access that you may wish to provide to your customers are up to you. For confidentiality and Privacy reasons, Mérieux NutriSciences Certification LLC will not release any audit reports or information relating to your organization to any third party without first obtaining your approval in writing.

Please do not assume that we, as your Certification Body automatically send audit report information to your customers. We do not! It is up to you to determine which customers will have access to your information. If you need us to distribute your SQF audit report or certificate to any customer specifically, please contact the office for assistance.

Changes to Products covered under the Scope of Certification

The products covered under your SQF Certification are listed on your certificate.

Additional products you introduce may not be included in the scope of certification automatically. Please ensure that any changes are discussed with your SQF Practitioner in the first instance. MNCertification should also be advised of proposed changes so that we can determine what if any, impact the proposed changes will have in regard to the ongoing validity of your current certificate of certification.   Our staff are also available to provide guidance if required.

External Audits of your SQF system by MNCertification.

As you are certified to SQF Code, your ongoing certification is subject to at least an **annual** recertification audit.   This is a full system audit that must occur within **30 days of the anniversary of your initial certification audit date (as identified in the SQF Database).** We will contact you prior to the due date to facilitate scheduling.

Depending on the outcome of each audit activity a surveillance audit may be required 6 months after the (re)certification date. **Again this audit must be done within 30 days of the scheduled date** and we will contact you in sufficient time to facilitate scheduling.

The scope of each audit will be confirmed by your auditor prior to the conduct of the audit.

SQF Unannounced Audit Protocol

In Edition 7.2 of the SQF Code includes requirements for the conduct of one (1) unannounced audit over the next 3 certification cycles.   Further information on this requirement can be reviewed in the Code itself (Part A, Clause 4.5).

MNCertification will discuss with you which year in the 3 year certification cycle the unannounced audit will occur. At that time you may nominate for consideration, any "blackout" periods that would prevent an unannounced audit from occurring for seasonal or when your facility is not operating for legitimate operational reasons.

Fundamentally when an unannounced audit occurs:

- It will only be at a re-certification audit (Desk Audits, Surveillance audits and initial certifications are excluded)
- It will be conducted within the 60 day window of the anniversary of your audit date (+/- 30 days), as identified in the SQF database.
- It will be a full SQF Food Safety & Quality system audit determined by your SQF Level of Certification

In the unlikely event that you refuse entry to an auditor for an unannounced audit, it would regrettably lead to the immediate suspension of your certification (per SQF Edition 7.2 Part A, 4.5).

Management System Review

It is a requirement of SQF that your Food Safety and Quality Management system is formally reviewed at least annually or when significant changes occur during the period of certification.   These Management or System Reviews must encompass the entire SQF management system. They should be fully documented and provide traceable evidence for your external auditor during certification or surveillance audits. The SQF Code Guidance Documents provides more information about the depth and scope of these reviews.

Internal maintenance of the SQF System

SQF Code certification is based on ongoing evidence of a sustainable Food Safety and Quality Management system.
As such it is essential that you ensure that your internal management of the Food Safety and quality process is ongoing and not just as a major event immediately prior to an external audit by MNCertification.

In preparation for each external audit the SQF Practitioner should ensure that sufficient records are available to verify ongoing maintenance of the system for the operational period since the last audit.

Records that may be requested at each audit to verify ongoing maintenance include but are not limited to:

- ➢ Internal Audit records
- ➢ Non-Conformance/Corrective Action records with evidence that issues have been resolved or are in the process of resolution
- ➢ Customer Complaints
- ➢ Calibration Records
- ➢ Pest Control records
- ➢ Verification records as required under food safety requirements these include records relating to incoming goods, Critical Control Points, Critical Limits, in process checks and product release inspections.
- ➢ Evidence of staff competence and training
- ➢ Approved Supplier records

MNCertification Auditors will, as part of the audit process, verify that records are representative of the cumulative activities covering the period of activity since the last audit.

Also please ensure all staff are aware that records are the primary basis of ensuring ongoing compliance to the requirements of your internal system and also for demonstrating to your customers that you are managing their specific and unique supplier requirements and specifications.

Remember that being able to trace records back to an authorized staff member through signatures, initials etc, is a basic requirement of any sustainable food safety and quality system.

Internal Audits

Your internal audit program is a central part of your system review process. We do urge you to review the SQF Code to re-familiarize yourself with the scope and depth of the internal audit requirement.

At future scheduled audits our auditors will assess your internal audit program to ensure that it encompasses the entire SQF system. Our experience to date is that many organizations have detailed sustainable review programs that focus on pre-requisite programs and facility maintenance activities but are less specific in relation to the additional review processes required by Module 2 of the SQF Code Edition 7.2.

To assist, you may wish to review Clause 2.1 of the SQF Code where on page 34 you will find a full list of those mandatory activities/processes that must be addressed by external auditors at every audit. These could potentially form a basis for determining a sustainable SQF internal audit program for your organization. Additionally the ReposiTrak Database does include audit templates that you may wish to consider using to conduct your own SQF internal audit. This can be found under "Audit Compliance" and then going to "Audit Status" to download the SQF report templates.

Dealing with Non-Conformance

From time to time MNCertification may raise Non-conformances (Corrective Action Requests) relating to elements of your SQF system.

Each Corrective action Request (NCR) will be discussed at the closing meeting and documented in the audit report that you receive shortly after conclusion of the audit activity. They will:
- ❖ Identify the clause and element of the SQF Code that applies
- ❖ Provide a definition of the SQF requirement; and:
- ❖ Provide an explanation of the activity/process that was identified by the auditor and assessed as non compliant.

At the closing meeting you are invited to seek additional clarification on the auditor's assessment, and in the unlikely situation that your wish to contest the reasons for any non-conformances you may lodge your objections in writing to our certification office using the contact details below.

Any objections should be raised as soon as possible after the closing meeting or receipt of the initial audit report provided to you shortly after completion of the audit.
SQFI is very specific about the grading of Non-Conformance issues raised as Corrective Actions and have defined in the Code

- ❖ what constitutes a Non-conformance
- ❖ established specific time lines on the resolution of non conformance issues.

The following matrix provides guidance on the SQFI requirements

Non Conformance Classification	Examples	Resolution Timeframe
Critical	➢ A breakdown of control(s) at a critical control point, Pre-requisite Program or other process step and judged likely to cause a significant public health risk whereby product safety is compromised and judged likely to result in a Class 1 or Class 2 recall and effective corrective action is not taken. ➢ Falsification of records relating to food safety controls and the SQF System	During a surveillance or re-certification audit, then: ➢ Immediate suspension of Certification will occur ➢ A Corrective Action Plan must be developed by you and reviewed by MNCertification within **48 hours** ➢ Closure must be verified by a follow up audit within **30 days of the date of Suspension** ➢ A re-certification audit must be conducted within **6 months**
Major	➢ A lack or deficiency in the SQF System producing unsatisfactory conditions that carry a food safety or quality risk and likely to result in a systems element breakdown.	During the re-certification audit, certification is withheld until rectified and verified. During a surveillance or re-certification audit, then evidence of effective closeout must be achieved within **14 days** (or less if determined by the auditor).
Minor	➢ A lack or deficiency in the SQF System that produces unsatisfactory conditions that if not addressed, may lead to a risk to food safety and quality but not likely to cause a systems element breakdown	Where a minor non-conformance is raised during any audit, then evidence of effective closeout must be achieved within **30 days**.

Further information on how SQFI defines and categorizes Non Conformance can be seen in the SQF Code itself which can be downloaded from the SQFI website www.sqfi.com under the Documents navigation bar.

You may wish to use the above matrix as a guide for classification of any internal Non conformances that you identify through your own internal audit and corrective action processes. This will ensure that any locally identified issues raised by you are consistently categorized and managed in an appropriate manner.

PDCA (Plan-Do-Check-Act)

One of the critical aspects in successfully dealing with identified Non conformities is not solely implementing "quick fixes" to corrections; it is extremely important that your organization focus on ensuring that the outcome is sustainable and focuses on a resolution that will ensure that re-occurrence is prevented in future

The PDCA (Plan-Do-Check-Act) cycle is well worth consideration as a management tool for dealing with non-conformities
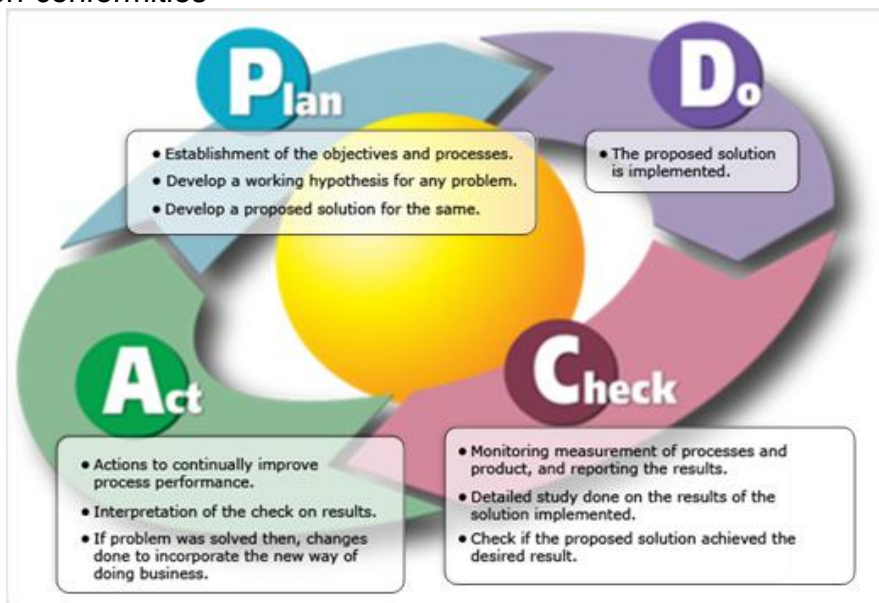
Product Recalls/Withdrawals - Obligations relating to SQF Certification

Clause 5.3 of the SQF Code (page 43) is very specific in regard to our joint responsibilities and obligations in relation to Product Recalls and Withdrawals.   It states:

"Upon identification that a certified supplier initiates a food safety event that requires public notification (such as a Class I or Class II recalls or receipt of a regulatory warning letter *), the supplier shall notify SQFI at* foodsafetycrisis@sqfi.com *and the Certification Body* certification@mxns.com *in writing within twenty-four (24) hours of the event.   The supplier's selected certification body and the SQFI shall be listed in the supplier's essential contacts lists as defined in Module 2, element 2.6.3 of the SQF Code.*

For clarification "a Food Safety event" includes Class I or Class II recalls or receipt of a regulatory warning letter.   It is also recommended that you advise us as your Certification Body of situations where there is significant potential for an outbreak but it has not yet resulted in the issue of a recall notice.

The MNCertification contact address for your essential contacts list is detailed above. Failure to include both of the above contact addresses in your essential contacts list will result in a non conformity being raised on discovery or at any future audit.

On receipt of a recall/withdrawal advice from your organization we will review the circumstances and monitor resolutions. We may seek additional information relating to your corrective action plan; however, we are conscious that care needs to be taken not to interrupt any critical operational actions you are taking.

In most cases the actions you have taken will be reviewed at the next scheduled audit; however, where, in our opinion the prevailing circumstances have a direct impact on the status of your certification we will contact you to determine the most appropriate method of ensuring that your SQF certification is not compromised.

Suspension and Withdrawal of Certification

Regrettably, from time to time situations do occur where MNCertification has to instigate Suspension or Withdrawal action relating to a specific organization that fails to demonstrate compliance to the SQF Code.

Clause 4.6 of the SQF Code (Part A), deals specifically with Suspension of Certification and Clause 4.7, addresses Withdrawal of Certification

Whilst we hope that your organization does not encounter these situations we do encourage you to read these Clauses of the Code carefully.

MNCertification is fully committed to maintaining the integrity of the SQF Code and our status as an approved Certification Body. At the same time we clearly recognize the negative impact to your business in instigating a course of action that leads to Suspension and/or withdrawal.

In the unlikely event that certification of your organization is suspended, you will be:
- Advised in writing prior to release of the audit report
- Requested to present a corrective action plan for our review; that outlines your proposed corrective and preventative actions. This must be provided within 48 hours of receipt of a Suspension Advice.
- Undertake a further audit within 30 days of receipt of our suspension advice to review the immediate corrections you have implemented and progress toward achievement of any ongoing corrective and preventative actions.

Assuming a satisfactory outcome is achieved at this additional audit, certification of your organization will be reinstated; however, a re-certification audit must be undertaken within 6 months to verify the effective implementation of the corrective action plan and that your

documented System is maintaining compliance to the SQF Code and achieving your stated objectives.

Please note that MNCertification do reserve the right to withdraw certification where defined corrective actions are not resolved following a suspension notification or; where, evidence provided in either corrective action plans or during follow up audits, does not give us confidence that the actions taken and proposed would not demonstrably eliminate the risk of reoccurrence.

Avoiding Suspension of Certification

As you will appreciate MNCertification is not permitted to provide consultancy or specific advice to clients as this is seen as a conflict of interest.

However, where the SQF certification of a number of our clients has been suspended, one or more of the following situations may be present:

- An ineffective Management Review process
- Ineffective senior management commitment to the implementation and maintenance of the SQF food Safety & Quality system
- An internal audit process that does not fully review the total SQF Food Safety and Quality system.
- Corrective actions resulting from internal audit or other review processes focus on immediate correction without adequately investigating root cause and/or preventative action
- An absence of key records that demonstrate systems are being managed effectively.

Feedback/ Complaints

At MNCertification we welcome feedback on our performance and of course audit outcomes. Should you have any concerns, feel free to contact us.

Of course following resolution of any raised issue, if you are not satisfied with the outcome you do have the right to escalate your concerns through our appeal process. Again any request of this nature should be lodged to the contact below. A copy of our internal appeals and complaint process is available and can be sent upon request.

We wish you every success with the ongoing maintenance of your SQF system.

Should you have any questions feel free to contact us!

Contact Details & General Enquiries

North America –   certification@mxns.com
Outside North America –   certification.au@mxns.com

Primary Contacts

North America –   Denise Anderson   denise.anderson@mxns.com

Outside North America –   Pari Farr   pari.farr@mxns.com