



Food Assurance

SQF Edition 9.0- What you need to know





Presenters



Tammie Van Buren



Brian Neal



Food Assurance

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Eurofins SAFER@WORKTM



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Eurofins SAFER@WORK™ program is designed and implemented by our experts in consulting, auditing and testing.









Getting Certified







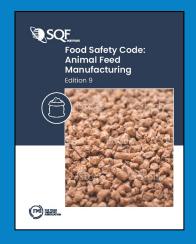


Poll Question:

Have you reviewed the key changes to SQF Edition 9 as it relates to your area?

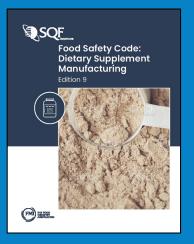




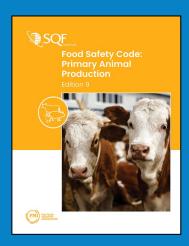


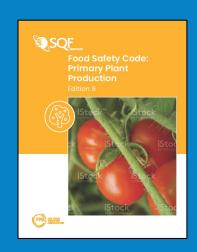






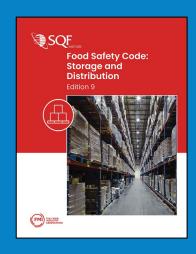
SQF Codes, Edition 9- Implementation May 24th, 2021

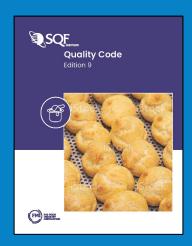








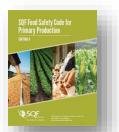




Edition 8.1

Edition 9





















Animal Product Manufacturina

7, 8,9 FSC:

Food Manufacturina

10-22, 25, 33

Dietary Supplements

Animal Feed

34

32

Pet Food

Storage and Distribution

26 FSC:

Food Packaging

Quality Code

Any GFSI Recognized Standard

Food Retail (23) Foodservice (24)

No Changes

- Primary Codes divided into three different Codes.
- Pre-packing of produce (module 10) has been removed and is now with Primary Plant products.
- Processing of animal products, pet food and animal feed have been removed from the Manufacturing Code into separate Codes.
- No changes to Food Retail, Foodservice, or Fundamentals Program.



Technical Changes Part A



- Changed scoring from 10 points to 5 points for a Major non-conformity.
- Modified requirement for unannounced audits to 1 unannounced audit every 3 years.
- Removed requirement for desk audit for initial certifications.
- Removed audit duration table and now reference duration guide provided by
- Included the option for remote audit activities.
- Clarified activities when a site is suspended or fails an audit.
- Added IF/THEN table for easy reference.

window:

The site does not permit the The certification body requests that within forty-eight (48) hours of receiving notice re-certification or surveillance of the suspension you provide a plan detailing the justification for the delay and the audit to occur within the audit timetable for the rescheduled audit (must be no more than thirty (30) days from the audit window).

> The certification body conducts an announced onsite recertification or surveillance audit (as applicable) within thirty (30) calendar days of receiving your corrective action plan.

> If your site successfully completes the SQF audit with an E, G, or C rating, the certification body reinstates your site status on the SQF assessment database and provides you with written notice that your certificate is no longer suspended.

> Regardless of the rating and because the site failed to permit the recertification audit in the designated timeframe, the certification body conducts an additional unannounced surveillance audit no more than six (6) months after the suspension to verify continued compliance with the SQF Code.

timeframe specified:

The site does not take The certification body requests that within forty-eight (48) hours of receiving notice corrective action within the of the suspension you provide a detailed plan outlining the corrective actions to be taken to resolve the outstanding non-conformances.

> The certification body verifies that the corrective action plan has been implemented through an onsite visit within thirty (30) calendar days of receiving your corrective action plan.

> When the corrective action plan has been successfully implemented, the certification body reinstates your site status on the SQF assessment database and provides you with written notice that your certificate is no longer suspended.



Technical Changes Part B



- There are numbering changes
 - Some sections restructured for better flow
- Reduction of sections and clauses in codes/audit
- The word register is now referred to as List



Technical Changes Part R



Top 9 for edition 9

- Addition of Food Safety Culture in the policy statement and its own requirement.
- Clarified oversight of contract manufacturers for high and low risk
- New requirement for product changeover and label reconciliation.
- Internal testing and sampling requirements.
- Additional training requirements as it pertains to testing and sampling requirements,

- Additional requirement for adequate ventilation.
- Added requirement for ambient air testing for high-risk processes.
- Accommodate PC in Storage and Distribution and Feed Standards.
- Additional requirements for water testing in Primary Produce Standard.





Primary Plant Production



- GFSI additions in Primary Plant Products – licensing & review process for plant/hybrids, HACCPbased model applied to Packhouses, "significant" incident CAPA.
- Environment monitoring added for indoor ag & packhouses.
- GFSI Chemical label compliance, visitor cross-contamination, waste system design.
- Water quality CAFO add in for leafy greens.
- Commodity specific SOP's for harvesting.





Edition 9 Key Changes:

Animal Feed Manufacturing

- HACCP based programs to include reference to preventive controls.
- Removed CIP reference
- Removed sensory evaluation.
- Removed Ice.
- 3.6.2 Cold Storage and thawing reference applicable to ingredients not feed.





Edition 9 Key Changes:

Pet Food Manufacturing

 Changed allergens to "Identity Preserved Foods." This better identifies the hazards to pets (i.e. grain free) and includes allergen requirements (not mandatory).





Food Packaging



- Clarified language to food sector packaging.
- Added requirement regarding quarantined product.
 - 2.4.5.2 Finished product returned from a customer shall be quarantined until authorized for release for use or reshipment.
- Modified environmental monitoring to be less prescriptive. Previously, the requirement was written to paper packaging.
- Clarified language around using other materials such as recycle material.
 - 2.3.2.4 All raw materials including those made with recycled material, plant based material or additional additives, shall be suitable for the intended use, food contact compliance where applicable, and shall comply with the relevant legislation in the country of manufacture and country of destination, if known.





Edition 9 Key Changes:

Storage and Distribution

- Storage & Distribution followed food manufacturing with customized language for DCs.
- HACCP based food safety plan and includes reference to preventive controls.
- Added: 12.6.2.5 Procedures are in place to identify the methods and responsibilities used to ensure that processes applied to materials prior to distribution (e.g. thawing, slacking, labeling) do not pose a risk to product safety or loss of traceability.





	Edition 8.1		Edition 9
2.1 Management Commitment	2.1.1 Food Safety Policy (Mandatory) 2.1.2 Management Responsibility (Mandatory) 2.1.3 Management Review (Mandatory) 2.1.4 Complaint Management (Mandatory) 2.1.5 Crisis Management Planning	2.1 Management Commitment	2.1.1 Management Responsibility (Mandatory) 2.1.2 Management Review (Mandatory) 2.1.3 Complaint Management (Mandatory)

Summary of changes:

- Combined, consolidated, and removed duplication of requirements.
- Clarified intent behind the requirement.
- Added food safety culture (2.1.1.1 and 2.1.1.2).
- Added requirement for substitute for SQF practitioner.
- Added requirement site is staffed and organized to meet food safety objectives.
- Moved Crisis Management Planning to 2.6.3 Recalls and Withdrawals.
- Removed 2.1.2.9 on continuous improvement.

2.2 Document Control and	2.2.1 Food Safety Management System	2.2 Document Control and Records	2.2.1 Food Safety Management System (Mandatory)
Records	2.2.2 Document Control (Mandatory)		2.2.2 Document Control (Mandatory)
	2.2.3 Records (Mandatory)		2.2.3 Records (Mandatory)

Summary of changes:

• Added requirement for retention periods to consider the shelf life of the product.





	Edition 8.1		Edition 9
2.3 Specification and Product	2.3.1 Product Development and Realization	2.3 Specifications, Formulations,	2.3.1 Product Formulation and Realization
Development	2.3.2 Raw and Packaging Materials	Realization and Supplier Approval	2.3.2 Specifications (Raw Material, Packaging, Finished
	2.3.3 Contract Service Providers		Product and Services)
	2.3.4 Contract Manufactures		2.3.3 Contract Manufacturers
	2.3.5 Finished Product Specifications		2.3.4 Approved Supplier Program (Mandatory)

Summary of Changes:

- Added detail regarding product formulations to include development by authorized persons and review when the there are changes in materials, ingredients, or equipment.
- Added process flow to 2.3.1.5.
- All specifications summarized under 2.3.2 and includes service providers.
- Added: suppliers to notify the site of changes in product composition that could have an impact on product formulation.
- Added Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.
- 2.3.2.4 has been split so that validation is retained in 2.3.2.4 and verification in 2.3.4.3.
- Co-manufacturers include high and low risk and third-party distributors.
- Approved supplier moved to 2.3.4 (formerly 2.4.4).

2.4 Food Safety Systems	2.4.1 Food Legislation (Mandatory)	2.4 Food Safety System	2.4.1 Food Legislation (Mandatory)
	2.4.2 Good Manufacturing Practices (Mandatory)		2.4.2 Good Manufacturing Practices (Mandatory)
	2.4.3 Food Safety Plan (Mandatory)		2.4.3 Food Safety Plan (Mandatory)
	2.4.4 Approved Supplier Program (Mandatory)		2.4.4 Product Sampling, Inspection, and Analysis
	2.4.5 Non-conforming Product or Equipment		2.4.5 Non-conforming Materials and Product
	2.4.6 Product Rework		2.4.6 Product Rework
	2.4.7 Product Release		2.4.7 Product Release (Mandatory)
	2.4.8 Environmental Monitoring		2.4.8 Environmental Monitoring

- Product sampling now under 2.4.4 (formerly 2.5.4).
- 2.4.4.1 includes requirement on sampling and testing to be representative of the process batch to ensure process controls are maintained.
- Testing and analysis now includes reference to internal as well as external laboratories (internal lab formerly 11.8.1). Proficiency testing included in 2.4.4.2 (formerly 2.5.4.2).
- Non-conforming equipment moved to 11.1.7.9
- Product release to include a procedure to confirm that product labels comply with the applicable food legislation
- Positive product release procedure in 2.4.7.3.





	Edition 8.1		Edition 9
2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory) 2.5.2 Verification Activities (Mandatory) 2.5.3 Corrective and Preventative Actions (Mandatory) 2.5.4 Product Sampling, Inspection and Analysis 2.5.5 Internal Audits and Inspections (Mandatory)	2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory) 2.5.2 Verification Activities (Mandatory) 2.5.3 Corrective and Preventative Action (Mandatory) 2.5.4 Internal Audits and Inspections (Mandatory)
Summary of Changes: • Added detail to where deviat	ions from food safety requirements may occur.		
2.6 Product Identification, Trace, Withdrawal and Recall	2.6.1 Product Identification (Mandatory) 2.6.2 Product Trace (Mandatory) 2.6.3 Product Withdrawal and Recall (Mandatory)	2.6 Product Traceability and Crisis Management	2.6.1 Product Identification (Mandatory) 2.6.2 Product Trace (Mandatory) 2.6.3 Product Withdrawal and Recall (Mandatory) 2.6.4 Crisis Management Planning

- Added Crisis Management Planning to 2.6.4 (formerly 2.1.5).
- Emphasized labeling requirements and checks during operations to ensure that the correct product is in the correct package and with the correct label.
- Product changeovers to be inspected and approved by an authorized person.
- Procedures shall be implemented to ensure that label use is reconciled, and any inconsistencies investigated and resolved.
- Added requirements for testing the recall system to include products from different shifts and for materials across a range of products and customers.





	Edition 8.1		Edition 9
2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud	2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud (Mandatory)
Summary of Changes: Consolidated to include all t	food defense and food fraud (from approved supplier)		
2.8 Allergen Management	2.8.1 Allergen Management and Food Manufacturing (Mandatory) 2.8.2 Allergen Management for Pet Food Manufacturing (Mandatory) 2.8.3 Allergen Management for Manufacturers of Animal Feed	2.8 Allergen Management	2.8.1 Allergen Management (Mandatory)
_	nagement the requirement to include labeling of gluten, ents regarding the approval, use, verification and recon	· ·	
2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory) 2.9.3 Instructions 2.9.4 HACCP Training Requirements 2.9.6 Refresher Training 2.9.7 Training Skills Register	2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory)

- Training consolidated down to two sections 2.9.1 Training Requirements and 2.9.2 Training Program.
- · Added training requirements for the following tasks:
 - -Sampling and test methods
 - -Environmental monitoring for relevant staff.
 - -Allergen management, food defense, and food fraud for all relevant staff.





Edition 8.1		Edition 9	
11.1 Site Location and Construction	11.1.1 Premises Location and Approval	11.1 Site Location and Premises	11.1.1 Premises Location and Approval 11.1.2 Building Materials 11.1.3 Lighting and Light Fittings 11.1.4 Inspection/Quality Control Area 11.1.5 Dust, Insect, and Pest Proofing 11.1.6 Ventilation 11.1.7 Equipment and Utensils 11.1.8 Grounds and Roadways

Summary of Changes:

- 11.1 Site Location and Premises now covers 11.1.2 Building Materials; 11.1.3 Lighting and Light Fittings; 11.1.4 Inspection/QC Area; 11.1.5 Dust, Insect, and Vermin Proofing; 11.1.6 Ventilation; 11.1.7 Equipment and Utensils; and 11.1.8 Grounds and Roadways.
- Added a separate requirement for ventilation and positive air pressure.
- Equipment storage rooms moved to storage (11.6).
- 11.1.7.9 includes non-conforming equipment from (Formerly 2.4.5).

11.2 Construction of	11.2.1 Materials and Surfaces	11.2 Site Operation	11.2.1 Repairs and Maintenance
Premises and Equipment	11.2.2 Floors, Drains and Waste Traps	·	11.2.2 Maintenance Staff and Contractors
	11.2.3 Walls, Partitions, Doors and Ceilings.		11.2.3 Calibration
	11.2.4 Stairs, Catwalks and Platforms		11.2.4 Pest Prevention
	11.2.5 Lightings and Light Fittings.		11.2.5 Cleaning and Sanitation
	11.2.6 Inspection/ Quality Control Area		
	11.2.7 Dust, Insect and Pest Proofing		
	11.2.8 Ventilation		
	11.2.9 Equipment, Utensils and Protective Clothing		
	11.2.10 Premises and Equipment Maintenance		
	11.2.11 Calibration		
	11.2.12 Pest Prevention		
	11.2.13 Cleaning and Sanitation		

- 11.2 Site Operations. Includes 11.2.1 Repairs and Maintenance; 11.2.2 Maintenance Staff and Contractors; 11.2.3 Calibration; 11.2.4 Pest Prevention; and 11.2.5 Cleaning and Sanitation.
- 11.2.2 Maintenance Staff and Contractors has been separated out from what was 11.2 Premises and Equipment Maintenance.
- Pest prevention restructured and clarified.
- Handwashing basins changed to stations.





Edition 8.1		Edition 9	
11.3 Personnel Hygiene and Welfare	11.3.1 Personnel 11.3.2 Hand Washing 11.3.3 clothing 11.3.4 Jewelry and Personal Effects 11.3.5 Visitors 11.3.6 Staff Amenities 11.3.7 Change Rooms 11.3.8 Laundry 11.3.9 Sanitary Facilities 11.3.10 Lunch Rooms	11.3 Personnel Hygiene and Welfare 11.3.2 Handwashing 11.3.3 Clothing and Personal Effects 11.3.4 Visitors 11.3.5 Staff Amenities (change rooms, toilets, break rooms)	11.3.1 Personnel Welfare

Summary of Changes:

- 11.3.2.5 Combined references to signage for handwashing.
- 11.3.3 Clothing and Personal Effects. (was "Clothing") Includes laundering, protective clothing, and jewelry.
- 11.3.5 Staff Amenities includes change rooms, toilets, and break rooms.

11.4 Personnel Processing Practices	11.4.1 Staff Engaged in Food Handling and	11.4 Personnel Processing Practices	11.4.1 Staff Engaged in Food Handling and
	Processing Operations		Processing Operations

- Differentiated requirements for staff Personnel working in or visiting food handling areas.
- Process flow captured in 11.4.1.3 (from 11.7.1).





Edition 8.1		Edition 9	
11.5 Water, Ice and Air-Supply	11.5.1 Water Supply 11.5.2 Water Treatment 11.5.3 Ice Supply 11.5.4 The Quality of Air and Other Gases	11.5 Water, Ice, and Air Supply	11.5.1 Water Supply 11.5.2 Water Treatment 11.5.3 Water Quality 11.5.4 Ice Supply 11.5.5 Air and Other Gases

Summary of Changes:

- 11.5.1.1: Added to water supply plan a requirement for contingency plans to be in place for instances when the potable water supply is deemed to be contaminated.
- 11.5.4.2 New clause in ice supply that ice is sourced from an approved supplier and included in the site's food safety risk assessment and to be supplied in appropriate containers.

11.6 Storage and Transport	11.6.1 Storage and Handling of Goods	11.6 Receipt, Storage and Transport	11.6.1 Receipt, Storage and Handling of
	11.6.2 Cold Storage Freezing and Chilling of		Goods
	Foods		11.6.2 Cold Storage, Freezing, and Chilling of
	11.6.3 Storage of Dry Ingredients, Packaging,		Foods
	and Shelf Stable Packaged Goods		11.6.3 Storage of Dry Ingredients, Packaging,
	11.6.4 Storage of Hazardous Chemicals and		and Shelf Stable Packaged Goods
	Toxic Substances		11.6.4 Storage of Hazardous Chemicals and
	11.6.5 Loading, Transport and Unloading		Toxic Substances
	Practices		11.6.5 Loading, Transport, and Unloading
	11.6.6 Loading		Practices
	11.6.7 Transport		
	11.6.8 Unloading		

- 11.6.1.2: New clause to meet GFSI GMP 4.1 to ensure all materials are received and stored properly to prevent cross-contamination risks.
- 11.6.4: Storage of chemicals also applies to chemical storage references in 11.2.4 Pest Prevention.
- 11.6.5.4: New requirement for loading and unloading docks shall be designed to protect the product during loading and unloading.





Edition 8.1		Edition 9	
11.7 Separation of Functions	11.7.1 Process Flow 11.7.2 Receipt of Raw and Packaging Materials and Ingredients 11.7.3 Thawing of Food 11.7.4 High Risk Processes 11.7.5 Control of Foreign Matter Contamination 11.7.6 Detection of Foreign Objects 11.7.7 Managing Foreign Matter Contamination Incidents	11.7 Separation of Functions	11.7.1 High-Risk Processes 11.7.2 Thawing of Food 11.7.3 Control of Foreign Matter Contamination 11.7.4 Detection of Foreign Objects

Summary of Changes:

- 11.7.1.2 Ambient air in high risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.
- 11.7.3.11 New clause: "Gaskets, Rubber Impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency."
- Receipt of raw materials moved to 11.6.1

11.8 On-site Laboratories	11.8.1 Location	11.8 Waste Disposal	11.8.1 Dry and Liquid Waste Disposal
11.9 Waste Disposal	11.9.1 Dry and Liquid Waste Disposal		

- On-site laboratories moved to 2.4.4.
- 11.8.1.3 Moved from 11.2.9.5 in ed 8. "Waste and overflow water from tubs, tanks and other equipment shall be discharged direct to the floor drainage system and meet local regulatory requirements."
- 11.8.1.10 New clause to meet GFSI GMP 12.1 regarding the effective removal and storage (if required) of waste water.



Most Frequently Commented Code Requirements



- 2.1.1.2 Food Safety Culture was the most frequently commented on.
 - Biggest concern was how the auditor will audit against it.
- **11.5.5.3** Ambient air testing required for all sites.
 - Feedback to why would it apply to all sites? Resulted in change to move it to High Risk NEW 11.7.1.2.
- 2.3.3.3 Contract Manufacturers for third party storage and distribution business.
 - Clarification regarding the use of other GFSI benchmarked standards and how it should apply.
- **2.4.4.2** Requirement for internal laboratories used for product analysis, sampling and testing methods shall be in accordance with 17025.
 - GFSI mandated requirement and can't be removed but based on public comment specific guidance or tip sheet will be developed
- 2.6.1.2 Requirements for label reconciliation.
 - Comments regarding how and where additional checks for label would apply.



Edition 9 Key Changes:

Food Safety Culture



- 2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum:
- The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures;
- ii. Adequate resources are available to meet food safety objectives;
- iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained;
- iv. Staff are informed and held accountable for their food safety and regulatory responsibilities;
- v. Staff are positively encouraged and required to notify management of actual or potential food safety issues; and
- vi. Staff are empowered to act to resolve food safety issues within their scope of work.



Food Safety Culture



Records

- •FS Objectives & Performances Measures
- Organization Chart
- Capital Project Plan
- •Internal Audit Reports
- •GMP Audit Reports
- •Recognition Programs
- Disciplinary Process
- •FS/Q Records
- Training Records
- Job Descriptions

Interviews

- •Are you meeting your FS objectives? How do you know?
- •Do you ever need help to get everything done? Who is your back-up?
- •Would you feel safe feeding your product to your family?
- •What happens if someone violates FS procedures?
- •Explain a time when you told management about a FS issue. What was the response?

Observations

- •Is the company transparent with performance info?
- Do people appear rushed?
- Are they completing tasks above the minimum requirements?
- Do employees seem hesitant to answer questions?
- Do you see personnel pick up trash off the floor or do they walk by it?





Edition 9 Key Changes:

Internal Laboratories

2.4.4.2 Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods which are validated as equivalent to the nationally recognized methods.

Where internal laboratories are used to conduct input, environmental or product analysis, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses.

External laboratories shall be accredited to ISO/IEC 17025 or equivalent international standard and included on the site's contract service specifications list (refer 2.3.2.11).



Proficiency Testing



New definition for edition 9.0:

Proficiency testing is done via interlaboratory comparisons and calibrates the performance of laboratory personnel and in-process testers, who conduct microbiological, chemical, or physical analyses of ingredients, materials, workin-progress, finished products and the processing environment.

Proficiency testing IS NOT:	Proficiency testing IS:
Training	Calibration
Intra-laboratory comparison	Inter-laboratory comparison
For product quality testing (or sensory)	For food safety testing (product or environmental)
Conducted for testing sent to a 3 rd party	Conducted for testing completed on-site



Implementation Best **Practices**



- Complete a gap analysis to identify changes needed
- Use the corrective action register and road map to guide changes necessary for compliance
- Complete a formal internal audit to verify compliance of completed changes
- Document SQF practitioner meetings with management on a standardized agenda with meeting minutes
- Cascade SQF sponsorship from top management throughout the organization with the SQF practitioners as champions of the process as part of the food safety culture
- Use a third party to help with or verify compliance
- Celebrate success! Be fully prepared before May 2021



Where to go?



If you would like further information:

Brian Neal

BrianNeal@EurofinsUS.com

Tammie Van Buren

Compliance@SQFI.com

SQFI Website

https://www.sqfi.com/resource-center/sqf-code-edition-9-downloads/



How can we help?



- Consulting Services
- Pre-Assessment Services
- Auditing Services
- SQF Code Edition 9.0 Training
- Food Safety Culture Training
- Much more





Poll Question:

Would you like someone to contact you?





Eurofins Assurance

FOR MORE INFORMATION, PLEASE CONTACT

BrianNeal@eurofinsus.com training@eurofinsus.com auditing@eurofinsus.com

www.eurofins.com/assurance/food