

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



All changes are highlighted in yellow.

### SQF System Elements for Food Safety Code for Manufacturing

	Edition 7		Edition 8	Comments
<b>2.1</b>	<b>Management Commitment</b>	<b>2.1</b>	<b>Management Commitment</b>	No change.
<b>2.1.1</b>	<b>Management Policy (M)</b>	<b>2.1.1</b>	<b>Food Safety Policy (Mandatory)</b>	Requirement title change
2.1.1.1	Senior management shall prepare and implement a policy statement that outlines as a minimum the: <ul style="list-style-type: none"> <li>i. <b>Organization</b>'s commitment to supply safe food;</li> <li>ii. Methods used to comply with its customer and regulatory requirements and continually improve its food safety management system; and</li> <li>iii. Organizations commitment to establish and review food safety objectives.</li> </ul>	2.1.1.1	Senior site management shall prepare and implement a policy statement that outlines as a minimum the: <ul style="list-style-type: none"> <li>i. The <b>site</b>'s commitment to supply safe food;</li> <li>ii. Methods used to comply with its customer and regulatory requirements and continually improve its food safety management system; and</li> <li>iii. The site's commitment to establish and review food safety objectives.</li> </ul>	The term 'organization' has changed to 'site', this does not change the requirement. This organization to site, change will not be highlighted in the rest of this document (to reduce repetition).
2.1.1.2	The policy statement shall be: <ul style="list-style-type: none"> <li>i. Signed by senior management;</li> <li>ii. Made available in language understood by all staff; and</li> <li>iii. Displayed in a prominent position and effectively communicated to all staff.</li> </ul>	2.1.1.2	The policy statement shall be: <ul style="list-style-type: none"> <li>i. Signed by senior site management;</li> <li>ii. Made available in language understood by all staff; and</li> <li>iii. Displayed in a prominent position and effectively communicated to all staff.</li> </ul>	No change.
<b>2.1.2</b>	<b>Management Responsibility (M)</b>	<b>2.1.2</b>	<b>Management Responsibility (Mandatory)</b>	No change.
2.1.2.1	The <b>organizational</b> reporting structure describing those who have responsibility for food safety shall be defined and communicated within the organization.	2.1.2.1	The reporting structure describing those who have responsibility for food safety shall be identified and communicated within the site.	The removal of the work 'organizational', which doesn't change the requirement.

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2.1.2.2	The senior management shall make provision to ensure fundamental food safety practices are adopted and maintained.	2.1.2.2	The senior site management shall make provision to ensure food safety practices <b>and all applicable requirements of the SQF System</b> are adopted and maintained.	Clause expanded to include the whole of the SQF System requirements.
2.1.2.3	The senior management shall ensure adequate resources are available to achieve food safety objectives and support the development, implementation, maintenance and ongoing improvement of the SQF System	2.1.2.3	The senior site management shall ensure adequate resources are available to achieve food safety objectives and support the development, implementation, maintenance and ongoing improvement of the SQF System.	No change.
2.1.2.4	<p>The senior management shall designate an SQF practitioner for each site with responsibility and authority to:</p> <ul style="list-style-type: none"> <li>i. Oversee the development, implementation, review and maintenance of the SQF System, including food safety fundamentals outlined in 2.4.2, and the food safety plan outlined in 2.4.3.</li> <li>ii. Take appropriate action to ensure the integrity of the SQF System; and</li> <li>iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.</li> </ul>	2.1.2.4	<p>Senior site management shall designate an SQF practitioner for each site with responsibility and authority to:</p> <ul style="list-style-type: none"> <li>i. Oversee the development, implementation, review and maintenance of the SQF System, including food safety fundamentals outlined in 2.4.2, and the food safety plan outlined in 2.4.3.</li> <li>ii. Take appropriate action to ensure the integrity of the SQF System; and</li> <li>iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.</li> </ul>	No change.
2.1.2.5	<p>The SQF practitioner shall:</p> <ul style="list-style-type: none"> <li>i. Be employed by the <b>supplier</b> as a company employee on a full-time basis;</li> <li>ii. Hold a position of responsibility in relation to the management of the <b>supplier's</b> SQF System;</li> </ul>	2.1.2.5	<p>The SQF practitioner shall:</p> <ul style="list-style-type: none"> <li>i. Be employed by the <b>site</b> as a company employee on a full-time basis;</li> <li>ii. Hold a position of responsibility in relation to the management of the <b>site's</b> SQF System;</li> <li>iii. Have completed a HACCP training course;</li> </ul>	Terminology updated from 'supplier' to 'site', which doesn't change the requirement. This can will not be highlighted in the rest of the document, to reduce repetition.

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	<p>iii. Have completed a HACCP training course;</p> <p>iv. Be competent to implement and maintain HACCP based food safety plans; and</p> <p>v. Have an understanding of the <b>SQF Code level 2</b> and the requirements to implement and maintain SQF System relevant to the supplier scope of certification.</p>		<p>iv. Be competent to implement and maintain HACCP based food safety plans; and</p> <p>v. Have an understanding of the <b>SQF Food Safety Code</b> and the requirements to implement and maintain SQF System relevant to the site's scope of certification.</p>	Updated reference from SQF Code level 2 to SQF Food Safety Code, to reflect the restructuring of the Code.
2.1.2.6	<b>The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have</b> the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented.	2.1.2.6	<b>Senior site management shall ensure the training needs of the site are resourced, implemented and meet the requirements outlined in system elements, 2.9, and that site personnel have met</b> the required competencies to carry out those functions affecting the legality and safety of food products.	Defined site management responsibility for training.
2.1.2.7	All staff shall be informed of their responsibility to report food safety problems to personnel with authority to initiate action.	2.1.2.7	<b>Senior site management shall ensure that all staff are informed of their food safety and regulatory responsibilities, are aware of their role in meeting the requirements of the SQF food safety Code, and are informed of their responsibility to report food safety problems to personnel with authority to initiate action.</b>	Reworded clause to defined site management communication responsibility.
2.1.2.8	Job descriptions for those responsible for food safety shall be documented and include provision to cover for the absence of key personnel.	2.1.2.8	Job descriptions for those responsible for food safety shall be documented and include provision to cover for the absence of key personnel.	No change.
2.1.2.9	The senior management shall establish processes to improve the effectiveness of the SQF System to demonstrate continuous improvement	2.1.2.9	Senior site management shall establish processes to improve the effectiveness of the SQF System to demonstrate continuous improvement	Terminology updated, otherwise no change.
		<b>2.1.2.10</b>	<b>Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.</b>	New element.
2.1.2.10		<b>2.1.2.11</b>	<b>Senior site management shall designate defined blackout periods that prevent unannounced re-</b>	New element.

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			certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed upon unannounced audit.	Blackout periods now included in system elements to allow auditor opportunity to verify designated blackout dates.
<b>2.1.3</b>	<b>Food Safety Management System (M)</b>	<b>2.1.3</b>	<b>Food Safety Management System (Mandatory)</b>	Moved to 2.2.
2.1.3.1	A food safety manual shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the organization will use to meet the requirements of this Standard, be made available to staff and include: i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The policy statement and organization chart; iii. The scope of the certification; and iv. A list of the products covered under the scope of certification.			Moved to 2.2, see 2.2 for key changes.
2.1.3.2	A food safety manual shall be documented, maintained, made available to relevant staff and include or reference the written procedures, pre-requisite programs, food safety plans and other documentation necessary to support the development and the implementation, maintenance and control of the SQF System.			Moved to 2.2, see 2.2 for key changes.
<b>2.1.4</b>	<b>Management Review (M)</b>	<b>2.1.3</b>	<b>Management Review (Mandatory)</b>	Formerly 2.1.4.
<b>2.1.4.1</b>	The senior management shall be responsible for reviewing the SQF System and documenting the review procedure. Reviews shall include:	<b>2.1.3.1</b>	The senior <b>site</b> management shall be responsible for reviewing the SQF System and documenting the review procedure. Reviews shall include:	Formerly 2.1.4.1.

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	i. The policy manual; ii. Internal and external audit findings; iii. Corrective actions and their investigations and resolution; and iv. Customer complaints and their resolution and investigation.		i. The policy manual; ii. Internal and external audit findings; iii. Corrective actions and their investigations and resolution; and iv. Customer complaints and their resolution and investigation.	The addition of the word 'site', but no change to the requirements.
2.1.4.2	The SQF System in its entirety shall be reviewed at least annually.	2.1.3.2	The SQF practitioner(s) shall update senior site management on a (minimum) monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. The SQF System in its entirety shall be reviewed at least annually.	Formerly 2.1.4.2.  Element expanded to include monthly update with site management to allow for more structured communication between site management and SQF practitioner.
2.1.4.3	Food safety fundamentals and food safety plans shall be reviewed when any changes implemented have an impact on the supplier's ability to deliver safe food.	2.1.3.3	Food safety plans, Good Manufacturing Practices and other aspects of the SQF System shall be reviewed and updated as needed when any potential changes implemented have an impact on the site's ability to deliver safe food.	Formerly 2.1.4.3.  Element expanded to include all elements of the SQF Code and that potential changes should be included.
2.1.4.4	Changes to food safety fundamentals and food safety plans that have an impact on the supplier's ability to deliver safe food are to be validated.	-	-	Moved to 2.2.1.2, see 2.2.1.2 for key changes.
2.1.4.5	Records of all reviews and reasons for amending documents, validations and changes to the SQF System shall be maintained	2.1.3.4	Records of all management reviews and updates shall be maintained.	Formerly 2.1.4.5.  Element amended to clarify that records refer to management reviews and updates.
2.1.5	Complaint Management	2.1.4	Complaint Management (Mandatory)	Section reference changed from 2.1.5 to 2.1.4.

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2.1.5.1	The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities shall be documented and implemented.	2.1.4.1	The methods and responsibility for handling and investigating the cause and resolution of complaints from customers and authorities, arising from products manufactured or handled on site, shall be documented and implemented.	Formerly 2.1.5.1.  Clarification added, that the element refers to complains of products manufactured or handled on site.
2.1.5.2	Trends of customer complaint data shall be investigated and analyzed by personnel knowledgeable about the incidents.	2.1.4.2	Trends of customer complaint data shall be investigated and analyzed by personnel knowledgeable about the incidents.	Formerly 2.1.5.2  No change.
2.1.5.3	Corrective action shall be implemented commensurate with the seriousness of the incident and as outlined under 2.5.5.	2.1.4.3	Corrective action shall be implemented based on the seriousness of the incident and as outlined in 2.5.5.	Formerly 2.1.5.3  Wording changed, but the meaning remains the same.
2.1.5.4	Records of customer complaints and their investigations shall be maintained.	2.1.4.4	Records of customer complaints and their investigations shall be maintained.	Formerly 2.1.5.4  No change.
2.1.6	<b>Business Continuity Planning</b>	2.1.5	<b>Crisis Management Planning</b>	Section header updated to be more representative of expectations of the section.  Section reference changed from 2.1.6 to 2.1.5.
2.1.6.1	A business continuity plan based on the understanding of known food safety threats to a business shall be prepared by senior management outlining the methods and responsibility the organization will implement to cope with a business crisis that may impact on the ability of the supplier to deliver safe food.	2.1.5.1	A crisis management plan that is based on the understanding of known potential dangers (e.g. flood, drought, fire, tsunami, or other severe weather or regional events such as warfare or civil unrest) that can impact the site's ability to deliver safe food, shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business crisis.	Formerly 2.1.6.1.  Element amended to clarify the change from business continuity changed to crisis management.  The change from business continuity to crisis management will not be highlighted in the

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				rest of this section, to reduce repetition.
2.1.6.2	<p>The business continuity plan shall include as a minimum:</p> <ul style="list-style-type: none"> <li>i. A senior manager responsible for decision making, oversight and initiating actions arising from a crisis management incident;</li> <li>ii. The nomination and training of a crisis management team;</li> <li>iii. The controls implemented to ensure a response does not compromise product safety;</li> <li>iv. The measures to isolate and identify product affected by a response to a crisis;</li> <li>v. The measures taken to verify the acceptability of food prior to release;</li> <li>vi. The preparation and maintenance of a current crisis alert contact list;</li> <li>vii. Sources of legal and expert advice; and</li> <li>viii. The responsibility for internal communications and communicating with authorities, external organizations and media.</li> </ul>	2.1.5.2	<p>The crisis management plan shall include as a minimum:</p> <ul style="list-style-type: none"> <li>i. A senior manager responsible for decision making, oversight and initiating actions arising from a crisis management incident;</li> <li>ii. The nomination and training of a crisis management team;</li> <li>iii. The controls implemented to ensure a response does not compromise product safety;</li> <li>iv. The measures to isolate and identify product affected by a response to a crisis;</li> <li>v. The measures taken to verify the acceptability of food prior to release;</li> <li>vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;</li> <li>vii. Sources of legal and expert advice; and</li> <li>viii. The responsibility for internal communications and communicating with authorities, external organizations and media.</li> </ul>	<p>Formerly 2.1.6.2.</p> <p>The addition of the requirement that supply-chain customers need to be added to the contact list.</p>
2.1.6.3	The business continuity plan shall be reviewed, tested and verified at least annually.	2.1.5.3	The crisis management plan shall be reviewed, tested and verified at least annually.	<p>Formerly 2.1.6.3.</p> <p>No change.</p>
2.1.6.4	Records of reviews and verification of the business continuity plan shall be maintained	2.1.5.4	Records of reviews of the crisis management plan shall be maintained.	<p>Formerly 2.1.6.4.</p> <p>Removal of the word 'verification' as a review, is a form of verification.</p>

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<b>2.2</b>	<b>Document Control and Records</b>	<b>2.2</b>	<b>Document Control and Records</b>	No change.
<b>2.2.1</b>	<b>Food Safety Management System (M)</b>	<b>2.2.1</b>	<b>Food Safety Management System (Mandatory))</b>	No change.
2.2.1.1	<p>A food safety <b>manual</b> shall be documented and maintained in either electronic and/or hard copy form.</p> <p>It shall outline the methods the organization will use to meet the requirements of this <b>Standard</b>, be made available to staff and include:</p> <ul style="list-style-type: none"> <li>i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard;</li> <li>ii. The policy statement and organization chart;</li> <li>iii. The scope of the certification; and</li> <li>iv. A list of the products covered under the scope of certification.</li> </ul>	2.2.1.1	<p>A food safety <b>management system</b> shall be documented and maintained in either electronic and/or hard copy form.</p> <p>It shall outline the methods the organization will use to meet the requirements of the <b>SQF Food Safety Code</b>, be made available to <b>relevant</b> staff and include:</p> <ul style="list-style-type: none"> <li>i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard;</li> <li>ii. The <b>food safety</b> policy statement and organization chart;</li> <li>iii. The scope of the certification;</li> <li>iv. A list of the products covered under the scope of certification;</li> <li>v. <b>Food safety procedures, pre-requisite programs, food safety plans; and</b></li> <li>vi. <b>Other documentation necessary to support the development and the implementation, maintenance and control of the SQF System.</b></li> </ul>	<p>Change of the description from manual to management system.</p> <p>Clarification that the 'Standard' is the 'SQF Food Safety Code'.</p> <p>Clarification that the methods only need to be made available to relevant staff.</p> <p>Clarification that the policy is specifically required for food safety.</p> <p>Added: Food safety procedures, pre-requisite programs, food safety plans; and Other documentation in support the development and the implementation, maintenance and control of the SQF System.</p>
		2.2.1.2	All changes made to food safety plans, Good Manufacturing Practices and other aspects of the SQF System shall be validated or justified.	Moved from 2.1.4.4, see 2.1.4.4. for key changes.
<b>2.2.1</b>	<b>Document Control (M)</b>	<b>2.2.2</b>	<b>Document Control (Mandatory)</b>	Element reference changed from 2.2.1 to 2.2.2.



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	<b>Edition 7</b>		<b>Edition 8</b>	<b>Comments</b>
<b>2.2.1.1</b>	The methods and responsibility for maintaining document control and ensuring staff have access to current documents shall be documented and implemented.	<b>2.2.2.1</b>	The methods and responsibility for maintaining document control and ensuring staff have access to current documents shall be documented and implemented.	Formerly 2.2.1.1.  No change.
<b>2.2.1.2</b>	A register of current SQF System documents and amendments to documents shall be maintained.	<b>2.2.2.2</b>	A register of current SQF System documents and amendments to documents shall be maintained.	Formerly 2.2.1.2.  No change.
<b>2.2.1.3</b>	Documents shall be safely stored and readily accessible.	<b>2.2.2.3</b>	Documents shall be safely stored and readily accessible.	Formerly 2.2.1.3.  No change.
<b>2.2.2</b>	<b>Records (M)</b>	<b>2.2.3</b>	<b>Records (Mandatory)</b>	Element reference changes from 2.2.2. to 2.2.3.
<b>2.2.2.1</b>	The methods and responsibility for undertaking monitoring activities, verifying, maintaining and retaining records shall be documented and implemented.	<b>2.2.3.1</b>	The methods and responsibility for undertaking monitoring activities, verifying, maintaining and retaining records shall be documented and implemented.	Formerly 2.2.1  No change.
<b>2.2.2.2</b>	All records shall be legible and suitably authorized by those undertaking monitoring activities that demonstrate inspections, analyses and other essential activities have been completed.	<b>2.2.3.2</b>	All records shall be legible and suitably authorized by those undertaking monitoring activities that demonstrate inspections, analyses and other essential activities have been completed.	Formerly 2.2.2.2  No change.
<b>2.2.2.3</b>	Records shall be readily accessible, retrievable, securely stored to prevent damage and deterioration and shall be retained in accordance with periods specified by a customer or regulations.	<b>2.2.3.3</b>	Records shall be readily accessible, retrievable, securely stored to prevent damage and deterioration and shall be retained in accordance with periods specified by a customer or regulations.	Formerly 2.2.2.3  No change.
<b>2.3</b>	<b>Specification and Product Development</b>	<b>2.3</b>	<b>Specification and Product Development</b>	No change.
<b>2.3.1</b>	<b>Product Development and Realization</b>	<b>2.3.1</b>	<b>Product Development and Realization</b>	No change.
<b>2.3.1.1</b>	The methods and responsibility for designing, developing and converting product concepts to commercial realization shall be documented and implemented.	<b>2.3.1.1</b>	The methods and responsibility for designing, developing and converting product concepts to commercial realization shall be documented and implemented.	No change.

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	<b>Edition 7</b>		<b>Edition 8</b>	<b>Comments</b>
2.3.1.2	Product formulation, manufacturing processes and the fulfilment of product requirements shall be validated by site trials, shelf life trials and product testing.	2.3.1.2	Product formulation, manufacturing processes and the fulfilment of product requirements shall be validated by site trials, shelf life trials and product testing.	No change.
2.3.1.3	Shelf life trials where necessary shall be conducted to establish and validate a product's: <ul style="list-style-type: none"> <li>i. Handling, storage requirements including the establishment of "use by" or "best before dates";</li> <li>ii. Microbiological criteria; and</li> <li>iii. Consumer preparation, storage and handling requirements.</li> </ul>	2.3.1.3	Shelf life trials where necessary shall be conducted to establish and validate a product's: <ul style="list-style-type: none"> <li>i. Handling, storage requirements including the establishment of "use by" or "best before dates";</li> <li>ii. Microbiological criteria; and</li> <li>iii. Consumer preparation, storage and handling requirements.</li> </ul>	No change.
2.3.1.4	A food safety plan shall be validated and verified for each new product and its associated process through conversion to commercial production and distribution, or where a change to ingredients, process, or packaging occurs that may impact food safety.	2.3.1.4	A food safety plan shall be validated and verified for each new product and its associated process through conversion to commercial production and distribution, or where a change to ingredients, process, or packaging occurs that may impact food safety.	No change.
2.3.1.5	Records of all product design, process development, shelf life trials and approvals shall be maintained.	2.3.1.5	Records of all product design, process development, shelf life trials and approvals shall be maintained.	No change.
<b>2.3.2</b>	<b>Raw and Packaging Materials</b>	<b>2.3.2</b>	<b>Raw and Packaging Materials</b>	No change.
2.3.2.1	Specifications for all raw and packaging materials, including, but not limited to ingredients, additives, hazardous chemicals and processing aids that impact on finished product safety shall be documented and kept current.	2.3.2.1	Specifications for all raw and packaging materials, including, but not limited to ingredients, additives, hazardous chemicals and processing aids that impact on finished product safety shall be documented and kept current.	No change.
2.3.2.2	All raw and packaging materials and ingredients shall comply with the relevant legislation.	2.3.2.2	All raw and packaging materials and ingredients shall comply with the relevant legislation <b>in the country of manufacture and country of destination, if known.</b>	Added that the legislation must be for the country of manufacture and the country for where the product is destined.

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	<b>Edition 7</b>		<b>Edition 8</b>	<b>Comments</b>
2.3.3.3	The methods and responsibility for developing and approving detailed raw material, ingredient, and packaging specifications shall be documented.	2.3.2.3	The methods and responsibility for developing and approving detailed raw material, ingredient, and packaging specifications shall be documented.	No change.
2.3.2.4	Raw and packaging materials and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose. Validation of raw materials and ingredients shall include <b>C</b> ertificate of conformance; or certificate of analysis; or sampling and testing.	2.3.2.4	Raw and packaging materials and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose. Verification of raw materials and ingredients shall include <b>c</b> ertificates of conformance; or certificate of analysis; or sampling and testing.	Grammar corrected, no change.
2.3.2.5	Validation of packaging materials shall include: i. Certification that all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. ii. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, tests and analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.	2.3.2.5	Verification of packaging materials shall include: i. Certification that all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. ii. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, tests and analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.	No change.
2.3.2.6	Product labels shall be accurate, comply with the relevant legislation and be approved by qualified company personnel.	2.3.2.6	<b>Finished</b> product labels shall be accurate, comply with the relevant legislation and be approved by qualified company personnel.	Clarification that this element refers to finished product labels.
2.3.2.7	A register of raw and packaging material specifications and labels shall be maintained and kept current.	2.3.2.7	A register of raw and packaging material specifications and labels shall be maintained and kept current.	No change.
<b>2.3.3</b>	<b>Contract Service Providers</b>	<b>2.3.3</b>	<b>Contract Service Providers</b>	No change.

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2.3.3.1	Specifications for contract services that have an impact on <b>finished</b> product safety shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of contract personnel.	2.3.3.1	Specifications for contract services that have an impact on product safety shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of all contract personnel.	Reference to finished product removed, as element refers to all products produced.
2.3.3.2	A register of all contract service specifications shall be maintained.	2.3.3.2	A register of all contract service specifications shall be maintained.	No change.
<b>2.3.4</b>	<b>Contract Manufacturers</b>	<b>2.3.4</b>	<b>Contract Manufacturers</b>	No change.
2.3.4.1	The methods and responsibility for ensuring all agreements relating to food safety and customer product requirements and its realization and delivery are specified and agreed shall be documented and implemented.	2.3.4.1	The methods and responsibility for ensuring all agreements relating to food safety and customer product requirements and its realization and delivery are specified and agreed shall be documented and implemented.	No change.
2.3.4.2	The supplier shall: <ul style="list-style-type: none"> <li>i. Verify compliance with the SQF Code and that all customer requirements are being met at all times. Products and/or processes of co-manufacturers that are considered high risk shall be required to undergo an audit by the <b>supplier</b> or other third-party agency to confirm compliance to the SQF Code and agreed arrangements; and</li> <li>ii. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel.</li> </ul>	2.3.4.2	The site shall: <ul style="list-style-type: none"> <li>i. Verify compliance with the SQF <b>Food Safety</b> Code and that all customer requirements are being met at all times. Products and/or processes of co-manufacturers that are considered high risk shall be required to undergo an audit by the <b>site</b> or other third-party agency to confirm compliance to the SQF <b>food safety</b> Code and agreed arrangements; and</li> <li>ii. Ensure changes to contractual agreements are approved by both parties and communicated to relevant personnel.</li> </ul>	Terminology updated, otherwise no change.
2.3.4.3	Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.	2.3.4.3	Records of all contract reviews and changes to contractual agreements and their approvals shall be maintained.	No change.
<b>2.3.5</b>	<b>Finished Product</b>	<b>2.3.5</b>	<b>Finished Product Specifications</b>	Title of element updated.

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	<b>Edition 7</b>		<b>Edition 8</b>	<b>Comments</b>
2.3.5.1	Finished product specifications shall be documented, current, approved by the <b>supplier</b> and their customer, accessible to relevant staff and may include: i. Microbiological and chemical limits; and ii. Labeling and packaging requirements.	2.3.5.1	Finished product specifications shall be documented, current, approved by the <b>site</b> and their customer, accessible to relevant staff and may include: i. Microbiological and chemical limits; and ii. Labeling and packaging requirements.	Terminology updated, otherwise no change.  Changes from supplier to site in the rest of this document will not be highlighted, to avoid repetition.
2.3.5.2	A register of finished product specifications shall be maintained.	2.3.5.2	A register of finished product specifications shall be maintained.	No change.
<b>2.4</b>	<b>Attaining Food Safety</b>	<b>2.4</b>	<b>Food Safety System</b>	Title updated.
<b>2.4.1</b>	<b>Food Legislation (Regulation) (M)</b>	<b>2.4.1</b>	<b>Food Legislation (Mandatory)</b>	Title updated.
2.4.1.1	The organization shall ensure that, at the time of delivery to its customer, the food supplied shall comply with the legislation that applies to the food and its production in the country of <b>its origin and destination</b> . This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, nutritional, allergen and additive labeling, and to relevant established industry codes of practice.	2.4.1.1	The site shall ensure that, at the time of delivery to its customer, the food supplied shall comply with the legislation that applies to the food and its production in the country of <b>use or sale</b> . This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, <b>net weights</b> , nutritional, allergen and additive labeling, <b>labeling of identify preserved foods, any other criteria listed under food legislation</b> , and to relevant established industry codes of practice.	Clarified that the product should comply with the country of sale, rather than the origin of the product. Added net weights, identity preserved foods and all other required defined by the relevant legislation.
2.4.1.2	The methods and responsibility for ensuring the organization is kept informed of changes to relevant legislation, scientific and technical developments and relevant industry codes of practice shall be documented and implemented.	2.4.1.2	The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.	No change.
2.4.1.3	SQFI and the certification body shall be notified in writing within 24 hours <b>upon identification of a food safety event that requires public notification (e.g. receipt of a regulatory warning letter)</b> .	2.4.1.3	SQFI and the certification body shall be notified in writing within <b>twenty-four (24) hours in the event of a regulatory warning</b> . Notification to SQFI shall be by email to <b>foodsafetycrisis@sqfi.com</b> .	Clarification of the requirements for regulatory warnings. Added specific contact email address for SQFI.
<b>2.4.2</b>	<b>Food Safety Fundamentals (M)</b>	<b>2.4.2</b>	<b>Good Manufacturing Practices (Mandatory)</b>	Changed header.

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
2.4.2.1	The property, buildings and equipment shall be located, constructed, designed and maintained to facilitate the hygienic production, manufacture, handling, storage and/or delivery of safe food.			Removed as topic was already covered in manufacturing modules.
2.4.2.2	The supplier shall ensure the food safety fundamentals described in the relevant subsequent modules of this Code (i.e. modules 3 – 15) are applied, or exempted according to a risk analysis outlining the justification for exclusion or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.	2.4.2.1	The site shall ensure the Good Manufacturing Practices described in modules 4, 9, 10 or 11 (as applicable) of this Food Safety Code are applied, or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.	<p>Formerly 2.4.2.2.</p> <p>Change to terminology.</p> <p>Specified relevant modules.</p> <p>Clarified that the risk assessment must be written for exemptions and that the assessment must explain why the alternative control is effective enough.</p> <p>The changes to terminology from food safety fundamentals to good manufacturing practices and from the Code to the Food Safety Code, will not be highlighted in the rest of this document, to avoid repetition.</p>
2.4.2.3	Those pre-requisite programs applicable to the scope of certification that outline the means by which food safety is controlled and assured shall be documented and implemented.	2.4.2.2	Those Good Manufacturing Practices applicable to the scope of certification that outline the means by which food safety is controlled and assured shall be documented and implemented.	<p>Formerly 2.4.2.3.</p> <p>Changed terminology from pre-requisite programs to Good Manufacturing practices. This change in terminology will not</p>

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
				be highlighted in the rest of this document, to avoid repetition.
2.4.2.4	The effectiveness of the pre-requisite programs shall be verified as described in 2.5.4.			Removed element as it was repetitive with validation elements below.
<b>2.4.3</b>	<b>Food Safety Plan (M)</b>	<b>2.4.3</b>	<b>Food Safety Plan (Mandatory)</b>	No change.
2.4.3.1	<p>A food safety plan shall be developed, effectively implemented, and maintained and outline the means by which the organization controls and assures food safety. The food safety plan shall:</p> <ul style="list-style-type: none"> <li>i. Be prepared in accordance with the steps identified in the Codex Alimentarius Commission or NACMCF HACCP guidelines. Primary producers and feed manufacturers may utilize a HACCP-based reference food safety plan developed by a responsible authority.</li> <li>ii. Cover a product or product group and the associated processes.</li> <li>iii. Describe the methodology and results of a hazard analysis conducted to identify food safety hazards associated with all inputs and process steps including rework. Animal feed and pet food safety plans must include hazards associated with animal safety as well as the safety of consumers of animal products.</li> <li>iv. Prescribe those measures taken to apply the controls implemented that are critical to assuring, monitoring and maintaining food safety.</li> <li>v. Include process controls at control points in</li> </ul>	2.4.3.1	A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines.	Element broken down into separate elements below.

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	production to monitor product safety, identify when a process is deviating from set parameters and make corrections to keep a process under control; and vi. Include documented Standard Operating Procedures (SOPs) and Work Instructions (WI) applicable to the organization's scope of certification.			
		2.4.3.2	The food safety plan shall be effectively implemented, and maintained and outline the means by which the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.3	The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant products and associated processes. Where the relevant expertise is not available on site, advice may be obtained from other sources to assist the food safety team.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.4	The scope of each food safety plan shall be developed and documented including the start and end-point of the processes under consideration and all relevant inputs and outputs.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.5	Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. This shall reference the finished product specifications (2.3.5.1) plus any additional	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.



# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
			information relevant to product safety, such as pH, water activity, and/or composition.	
		2.4.3.6	The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative use of the product.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.7	The food safety team shall develop and document a flow diagram covering the scope of each food safety plan. The flow diagram shall include every step in the process, all raw material, packaging material, and service inputs (water, steam, gasses as appropriate), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team during all stages and hours of operation.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.8	The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.9	The food safety team shall conduct a hazard analysis for every identified hazard, to identify which hazards are significant, i.e. their elimination or reduction to an acceptable level is necessary to ensure food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.10	The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure	Formerly 2.4.3.1

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
			may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure.	Added more detail around CODEX HACCP methodology.
		2.4.3.11	Based on the results of the hazard analysis (2.4.3.9), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.12	For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product. The food safety team shall validate the critical limits to ensure the designated level of control of the identified food safety hazard(s); and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer 2.5.2.1).	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.13	The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.14	The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
		2.4.3.15	The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs or other changes affecting product safety occur.	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.16	Implemented food safety plans shall be verified as part of SQF System verification (2.5).	Formerly 2.4.3.1  Added more detail around CODEX HACCP methodology.
		2.4.3.17	Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements.	New element.  Clarifies that where other HACCP style methods (such as HARPC) are required, that both must be complied with.
2.4.5	<b>Incoming Goods and Services</b>	2.4.4	<b>Approved Supplier Program (Mandatory)</b>	Changed header and reference.
2.4.5.1	Raw materials, ingredients, packaging materials, and services that impact on finished product safety shall be supplied by an approved supplier.	2.4.4.1	Raw materials, ingredients, packaging materials, and services that impact on finished product safety shall meet the agreed specification (2.3.2) and be supplied by an approved supplier.	Formerly 2.4.5.1  Added requirement for meeting the product specification.
2.4.5.2	The receipt of raw materials, ingredients, and packaging materials received from non-approved supplier shall be acceptable in an emergency situation provided they are inspected or analyzed before use.	2.4.4.2	The receipt of raw materials, ingredients, and packaging materials received from non-approved suppliers shall be acceptable only in an emergency situation, and provided they are inspected or analyzed before use.	Formerly 2.4.5.2.  Clarification that this can only apply to an emergency situation.
2.4.5.3	The responsibility for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented.	2.4.4.3	The responsibility and procedure for selecting, evaluating, approving and monitoring an approved supplier shall be documented and implemented.	Formerly 2.4.5.3.

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
				Added the requirement for a documented procedure.
		2.4.4.4	The site's food defense plan (refer 2.7.1.1) shall include measures to secure incoming materials and ingredients and protect them from deliberate act of sabotage or terrorist-like incidents.	New element.  Added food defence requirements for incoming materials.
		2.4.4.5	The site's food fraud vulnerability assessment (refer 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.	New element.  Added food fraud assessment of incoming materials.
		2.4.4.6	The food fraud mitigation plan (refer 2.7.2.2) shall include methods by which the identified food safety vulnerabilities from ingredients and materials shall be controlled.	New element.  Added food fraud plan for incoming materials.
		2.4.4.7	Raw materials, ingredients, and packaging materials received from other facilities under the same corporate ownership, shall be subject to the same specification requirements (refer 2.3.2) and approved supplier requirements as all other material providers.	New element.  Clarification that materials from internal suppliers, still must meet the requirements.
2.4.5.4	The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum: i. Agreed specifications; ii. Reference to the rating of the level of risk applied to a raw material ingredients, packaging materials and services and the	2.4.4.8	The approved supplier program shall be based on the prior performance of a supplier and the risk level of the raw materials ingredients, packaging materials, and services supplied, and shall contain as a minimum: i. Agreed specifications (refer 2.3.2); ii. Reference to the rating of the level of risk applied to a raw material ingredients, packaging materials and services and the	Formerly 2.4.5.4.  Added reference to 2.3.2 for clarification.

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	<p>approved supplier;</p> <p>iii. A summary of the food safety controls implemented by the approved supplier;</p> <p>iv. Methods for granting approved supplier status;</p> <p>v. Methods and frequency of monitoring approved suppliers;</p> <p>vi. Details of the certificates of conformance if required, and</p> <p>vii. Methods and frequency of reviewing approved supplier performance and status.</p>		<p>approved supplier;</p> <p>iii. A summary of the food safety controls implemented by the approved supplier;</p> <p>iv. Methods for granting approved supplier status;</p> <p>v. Methods and frequency of monitoring approved suppliers;</p> <p>vi. Details of the certificates of conformance if required; and</p> <p>vii. Methods and frequency of reviewing approved supplier performance and status.</p>	
		2.4.4.9	Supplier audits shall be based on risk and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements risk and trained in auditing techniques.	New element.
2.4.5.5	A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained	2.4.4.10	A register of approved supplier and records of inspections and audits of approved suppliers shall be maintained.	Formerly 2.4.5.5. No change.
<b>2.4.6</b>	<b>Non-conforming Product or Equipment</b>	<b>2.4.5</b>	<b>Non-conforming Product or Equipment</b>	Element reference change.
2.4.6.1	<p>The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, packaging or equipment detected during receipt, storage, processing, handling or delivery is handled shall be documented and implemented. The methods applied shall ensure:</p> <p>i. Non-conforming product is quarantined, identified, handled and disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and</p> <p>ii. Non-conforming equipment is effectively</p>	2.4.5.1	<p>The responsibility and methods outlining how non-conforming product, raw material, ingredient, work-in-progress, packaging or equipment detected during receipt, storage, processing, handling or delivery is handled shall be documented and implemented. The methods applied shall ensure:</p> <p>i. Non-conforming product is quarantined, identified, handled and disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and</p> <p>ii. Non-conforming equipment is effectively</p>	<p>Formerly 2.4.6.1.</p> <p>Removed and moved requirements for primary producers to separate relevant Code.</p>

## SQF Food Safety Code for Manufacturing

### Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	<p>repaired or disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and</p> <p>iii. All relevant staff is aware of the organization's quarantine and release requirements applicable to equipment or product placed under quarantine status.</p> <p>iv. For producers, the procedure must document the grower, field name, quantity and final disposition of the unacceptable materials when applicable.</p>		<p>repaired or disposed of in a manner that minimizes the risk of inadvertent use, improper use or risk to the integrity of finished product; and</p> <p>iii. All relevant staff are aware of the organization's quarantine and release requirements applicable to equipment or product placed under quarantine status.</p>	
2.4.6.2	Quarantine records, and records of the handling, corrective action, or disposal of non-conforming product or equipment shall be maintained.	2.4.5.2	Quarantine records, and records of the handling, corrective action, or disposal of non-conforming product or equipment shall be maintained.	<p>Formerly 2.4.6.2.</p> <p>No change.</p>
<b>2.4.7</b>	<b>Product Rework</b>	<b>2.4.6</b>	<b>Product Rework</b>	Element reference change.
2.4.7.1	<p>The responsibility and methods outlining how the product is reworked (recycled or recouped) shall be documented and implemented. The methods applied shall ensure:</p> <ul style="list-style-type: none"> <li>i. Reworking operations are supervised by qualified personnel;</li> <li>ii. Reworked product is clearly identified and traceable;</li> <li>iii. Each batch of reworked product is inspected or analyzed as required before release;</li> <li>iv. Inspections and analyses shall conform to the requirements outlined in element 2.5.6; and</li> </ul>	2.4.6.1	<p>The responsibility and methods outlining how ingredients, packaging materials, or products are reworked shall be documented and implemented. The methods applied shall ensure:</p> <ul style="list-style-type: none"> <li>i. Reworking operations are supervised by qualified personnel;</li> <li>ii. Reworked product is clearly identified and traceable;</li> <li>iii. Each batch of reworked product is inspected or analyzed as required before release;</li> <li>iv. Inspections and analyses shall conform to the requirements outlined in element 2.5.6; and</li> </ul>	<p>Formerly 2.4.7.1.</p> <p>Clarification that rework applies to ingredient, packaging and product.</p> <p>Reference also updated.</p>

## SQF Food Safety Code for Manufacturing

### Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	v. Release of reworked product shall conform to element <b>2.4.8.</b>		v. Release of reworked product shall conform to element <b>2.4.7.</b>	
2.4.7.2	Records of all reworking operations shall be maintained.	<b>2.4.6.2</b>	Records of all reworking operations shall be maintained.	Formerly 2.4.7.2.  No change.
<b>2.4.8</b>	<b>Product Release (M)</b>	<b>2.4.7</b>	<b>Product Release (Mandatory)</b>	Element reference changed.
2.4.8.1	The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released: i. By authorized personnel; and ii. Once all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met.	<b>2.4.7.1</b>	The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released: i. By authorized personnel; and ii. Once all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met.	Formerly 2.4.8.1.  No change.
2.4.8.2	Records of all product release shall be maintained.	<b>2.4.7.2</b>	Records of all product release shall be maintained.	Formerly 2.4.8.2.  No change.
<b>2.4.9</b>	<b>Stock Rotation</b>	<b>2.4.8</b>	<b>Environmental Monitoring</b>	Stock rotation now covered in 11.6 Storage and Transport element.  New section of Environmental Monitoring added.
		<b>2.4.8.1</b>	<b>A risk-based environmental monitoring program shall be in place for all food and pet food manufacturing processes.</b>	New element.  Environmental monitoring added as a system elements (topic was in formerly within the GMP module but only for high risk).

# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
		2.4.8.2	The responsibility and methods for the environmental monitoring program shall be documented and implemented.	New element.  Environmental monitoring added as a system elements (topic was in formerly within the GMP module but only for high risk).
		2.4.8.3	An environmental sampling and testing schedule shall be prepared, detailing the applicable pathogens or indicator organisms to test for that industry, the number of samples to be taken and the frequency of sampling.	New element.  Environmental monitoring added as a system elements (topic was in formerly within the GMP module but only for high risk).
		2.4.8.4	Environmental testing results shall be monitored and corrective actions (refer 2.5.3.1) implemented where unsatisfactory trends are observed.	New element.  Environmental monitoring added as a system elements (topic was in formerly within the GMP module but only for high risk).
2.5	<b>SQF System Verification</b>	2.5	<b>SQF System Verification</b>	No change.
2.5.1	<b>Responsibility, Frequency and Methods Incorporated</b>			Header removed.
2.5.1.1	Validation and verification activities shall be conducted.			Removed repetitive elements, merged others with existing elements.
2.5.1.2	The frequency and methods used to validate and verify food safety fundamentals, critical limits, and other food safety controls identified in food safety plans shall be documented and implemented and meet their intended purpose.			Removed repetitive elements, merged others with existing elements.



# SQF Food Safety Code for Manufacturing

## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
2.5.1.3	Records of all verification activities shall be maintained.			Removed repetitive elements, merged others with existing elements.
2.5.2	<b>Validation &amp; Effectiveness (M)</b>	2.5.1	<b>Validation and Effectiveness (Mandatory)</b>	No change.
2.5.2.1	<p>The methods, responsibility and criteria for ensuring the effectiveness of pre-requisite programs, and validating critical food safety limits to ensure they achieve their intended purpose shall be documented and implemented. The methods applied shall ensure that:</p> <ul style="list-style-type: none"> <li>i. Pre-requisite programs are confirmed to ensure they achieve the required result.</li> <li>ii. Critical limits are selected to achieve the designated level of control of the identified food safety hazard(s); and</li> <li>iii. All critical limits and control measures individually or in combination effectively provide the level of control required.</li> <li>iv. Changes to the processes or procedures are assessed to ensure controls are still effective.</li> <li>v. Critical food safety limits are re-validated at least annually.</li> </ul>	2.5.1.1	<p>The methods, responsibility and criteria for ensuring the effectiveness of all applicable elements of the SQF program shall be documented and implemented. The methods applied shall ensure that:</p> <ul style="list-style-type: none"> <li>i. Good Manufacturing Practices are confirmed to ensure they achieve the required result;</li> <li>ii. Critical food safety limits are validated, and re-validated annually;</li> <li>iii. Changes to the processes or procedures are assessed to ensure controls are still effective;</li> <li>and</li> <li>iv. All applicable elements of the SQF program are implemented and effective.</li> </ul>	<p>Formerly 2.5.2.1</p> <p>Terminology amended from pre-requisite programs to SQF program.</p> <p>Repetitive elements around critical limits have been removed, others merged with existing elements.</p>
2.5.2.2	Records of all validation activities shall be maintained.	2.5.1.2	Records of all validation activities shall be maintained.	Element reference amended.
2.5.3	<b>Verification Schedule</b>	2.5.2	<b>Verification Activities (Mandatory)</b>	Section title and reference updated.
2.5.3.1	A verification schedule outlining the verification activities, their frequency of completion and the person responsible for each activity shall be prepared and implemented.	2.5.2.1	A verification schedule outlining the verification activities, their frequency of completion and the person responsible for each activity shall be prepared and implemented.	<p>Formerly 2.5.3.1.</p> <p>No change.</p>
2.5.4	<b>Verification of Monitoring Activities (M)</b>			Section header removed.

## SQF Food Safety Code for Manufacturing

### Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
2.5.4.1	The methods, responsibility and criteria for verifying the effectiveness of monitoring pre-requisite programs, critical control points and other food safety controls <b>identified</b> shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record verified.	2.5.2.2	The methods, responsibility and criteria for verifying monitoring of Good Manufacturing Practices, critical control points and other food safety controls, <b>and the legality of certified products</b> , shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.	Formerly 2.5.4.1.  Clarified that the element applies to legal verification of (certified) products.
2.5.4.2	Records of the verification of monitoring activities shall be maintained.	2.5.2.3	Records of the verification of monitoring activities shall be maintained.	Formerly 2.5.4.2.  No change.
<b>2.5.5</b>	<b>Corrective and Preventative Action (M)</b>	<b>2.5.3</b>	<b>Corrective and Preventative Action (Mandatory)</b>	No change.
2.5.5.1	The responsibility and methods outlining how corrections and corrective actions are <b>investigated, resolved, managed and controlled</b> , including the identification of the root cause and resolution of non-compliance of critical food safety limits, and deviations from food safety requirements, shall be documented and implemented.	2.5.3.1	The responsibility and methods outlining how corrections and corrective actions are <b>determined, implemented and verified</b> , including the identification of the root cause and resolution of non-compliance of critical food safety limits, and deviations from food safety requirements, shall be documented and implemented.	Formerly 2.5.5.1  Clarification that determination of the right action is important and that it must be implemented and verified.
2.5.5.2	Records of all investigation and resolution of corrections and corrective action shall be maintained.	2.5.3.2	Records of all investigation and resolution of <b>non-conformities including their</b> corrections and corrective action shall be maintained.	Formerly 2.5.5.2  Clarification that the original non-conformity must be recorded, as well as the action.
<b>2.5.6</b>	<b>Product Sampling, Inspection and Analysis</b>	<b>2.5.4</b>	<b>Product Sampling, Inspection and Analysis</b>	Element reference changed.
2.5.6.1	The methods, responsibility and criteria for sampling, inspecting and/or analyzing raw materials, finished product and work in progress shall be documented and implemented. The methods applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specification and legal requirements;	2.5.4.1	The methods, responsibility and criteria for sampling, inspecting and/or analyzing raw materials, finished product and work in progress shall be documented and implemented. The methods applied shall ensure: i. Inspections and analyses are completed at regular intervals as required and to agreed specification and legal requirements;	Formerly 2.5.6.1.  Laboratory requirements moved below.

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## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	<p>ii. Inspections are conducted to ensure raw materials, work in process and finished products comply with the relevant specification, regulatory requirements and are true to label; and</p> <p>iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods.</p> <p>iv. Where external laboratories are utilized to conduct input or product analysis, the laboratories shall be accredited to ISO 17025 or an equivalent national standard.</p>		<p>ii. Inspections are conducted to ensure raw materials, work in process and finished products comply with the relevant specification, regulatory requirements and are true to label; and</p> <p>iii. All analyses are conducted to nationally recognized methods or alternative methods which are validated as equivalent to the nationally recognized methods.</p>	
		2.5.4.2	On-site personnel that conduct environmental or product testing shall participate in an applicable proficiency testing program at least annually to ensure accuracy of results.	New element.
		2.5.4.3	Where external laboratories are utilized to conduct input or product analysis, the laboratories shall be accredited to ISO 17025 or an equivalent national standard, and shall be included on the site's contract service specifications register (refer 2.3.3.1).	Formerly 2.5.6.1 iv with some updates.
2.5.6.2	Records of all inspections and analyses shall be maintained.	2.5.4.4	Records of all inspections and analyses shall be maintained.	Formerly 2.5.6.2.  No change.
<b>2.5.7</b>	<b>Internal Audits (M)</b>	<b>2.5.5</b>	<b>Internal Audits and Inspections (Mandatory)</b>	Changed header and updated reference.
2.5.7.1	The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System including site and equipment inspections, pre-requisite programs, food safety plans	2.5.5.1	The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and	Formerly 2.5.7.1  Clarification that audits must be carried out annually and that

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## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	<p>and legislative controls shall be documented and implemented. The methods applied shall ensure:</p> <ul style="list-style-type: none"> <li>i. An internal audit schedule is prepared detailing the scope and frequency of internal audits;</li> <li>ii. Correction and corrective action of deficiencies identified during the internal audits are undertaken;</li> <li>iii. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions; and</li> <li>iv. Records of internal audits and any corrections and corrective action taken as a result of internal audits shall be maintained.</li> </ul>		<p>implemented. Internal audits shall be conducted at least annually. The methods applied shall ensure:</p> <ul style="list-style-type: none"> <li>i. All applicable requirements of the SQF Food Safety Code are audited as per the SQF audit checklist or similar tool;</li> <li>ii. Correction and corrective action of deficiencies identified during the internal audits are undertaken; and</li> <li>iii. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective actions.</li> </ul>	<p>they must cover all requirements of the SQF Code.</p> <p>Removal of the need for a scope, although this (as per above) would need to match the scope of the SQF Code.</p> <p>Records moved to element below.</p>
2.5.7.2	Staff conducting internal audits shall be trained in internal audit procedures.	2.5.5.2	Staff conducting internal audits shall be trained and competent in internal audit procedures.	<p>Formerly 2.5.7.2.</p> <p>Clarified that auditors must be competent as well as trained.</p>
		2.5.5.3	<p>Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and building/equipment maintenance is compliant to the SQF Food Safety Code.</p> <p>The site shall:</p> <ul style="list-style-type: none"> <li>i. Take corrections or corrective and preventative action; and</li> <li>ii. Maintain records of inspections and any corrective action taken.</li> </ul>	New element, regarding the requirements for GMP audits.
2.5.7.3	Where possible staff conducting internal Audits shall be independent of the function being audited.	2.5.5.4	Where practical staff conducting internal audits shall be independent of the function being audited.	<p>Formerly 2.5.7.3.</p> <p>No change.</p>

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## Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
		2.5.5.5	Records of internal audits and inspections and any corrections and corrective action taken as a result of internal audits shall be maintained.	Formerly 2.5.7.1iv  Included the word inspection, as a form of audit.
2.6	<b>Product Identification, Trace, Withdrawal and Recall</b>	2.6	<b>Product Identification, Trace, Withdrawal and Recall</b>	No change.
2.6.1	<b>Product Identification (M)</b>	2.6.1	<b>Product Identification (Mandatory)</b>	No change.
2.6.1.1	The methods and responsibility for identifying products during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure: i. Raw materials, work in progress and finished product are clearly identified during all stages of receipt, production, storage and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.	2.6.1.1	The methods and responsibility for identifying raw materials, ingredients, packaging materials, work-in progress, process inputs and finished products during all stages of production and storage shall be documented and implemented. The product identification system shall be implemented to ensure: i. Raw materials, ingredients, packaging materials, work-in progress, process inputs and finished products are clearly identified during all stages of receipt, production, storage and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.	Clarified that identification of ingredients, packaging materials, work-in progress and process inputs are included.
2.6.1.2	Product identification records shall be maintained.	2.6.1.2	Product identification records shall be maintained.	No change.
		2.6.1.3	Product start up and changeover procedures during packing shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label, and that the changeover is inspected and approved by an authorized person.	New element.  Change overs must be controlled to ensure right product right pack.
2.6.2	<b>Product Trace (M)</b>	2.6.2	<b>Product Trace (Mandatory)</b>	No change.
2.6.2.1	The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the	2.6.2.1	The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable to the customer (one up) and provides traceability through the	Clarified that the trace must go back to the manufacturing supplier of the material (rather

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	Edition 7		Edition 8	Comments
	<p>process to the supplier and date of receipt of raw materials, food contact packaging and materials and other inputs (one back);</p> <p>ii. Traceability is maintained where product is reworked; and</p> <p>iii. The effectiveness of the product trace system shall be <b>tested</b> at least annually.</p>		<p>process to the <b>manufacturing</b> supplier and date of receipt of raw materials, food contact packaging and materials and other inputs (one back);</p> <p>ii. Traceability is maintained where product is reworked; and</p> <p>iii. The effectiveness of the product trace system shall be <b>reviewed</b> at least annually <b>as part of the product recall and withdrawal review</b> (refer to 2.6.3.3).</p>	<p>than just the supplier, which could be an agent).</p> <p>Clarified that the trace can be done "as part of the product recall and withdrawal review (refer 2.6.3.3)".</p>
2.6.2.2	Records of raw and packaging material receipt and use, and product dispatch and destination shall be maintained.	2.6.2.2	Records of raw and packaging material receipt and use, and <b>finished</b> product dispatch and destination shall be maintained.	Added "finished" for clarification.
<b>2.6.3</b>	<b>Product Withdrawal and Recall (M)</b>	<b>2.6.3</b>	<b>Product Withdrawal and Recall (Mandatory)</b>	No change.
2.6.3.1	<p>The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall:</p> <p>i. Identify those responsible for initiating, managing and investigating a product withdrawal or recall;</p> <p>ii. Describe the management procedures to be implemented including sources of legal and expert advice; and</p> <p>iii. Outline a communication plan to inform customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident.</p> <p>iv. SQFI and the certification body shall be listed as an essential body and notified in instances of a food safety incident of a public nature, or product recall for any reason.</p>	2.6.3.1	<p>The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall:</p> <p>i. Identify those responsible for initiating, managing and investigating a product withdrawal or recall;</p> <p>ii. Describe the management procedures to be implemented including sources of legal, <b>regulatory</b> and expert advice and <b>essential traceability information and expert advice</b>; and</p> <p>iii. Outline a communication plan to inform customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident.</p> <p>iv. SQFI, the certification body, <b>and the appropriate regulatory authority</b> shall be listed as an essential body and notified in instances</p>	<p>Clarification that sources regulatory advice must be included in the procedure and that information that is critical to the incident must be provided to expert advice.</p> <p>Any regulatory authorities have been added to those who must be informed in such an event.</p>

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### Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
			of a food safety incident of a public nature, or product recall for any reason.	
2.6.3.2	Investigation shall be undertaken to determine the root cause of a withdrawal or recall and details of investigations and any action taken shall be documented.	2.6.3.2	Investigation shall be undertaken to determine the root cause of a withdrawal, <b>mock recall</b> or recall and details of investigations and any action taken shall be documented.	<p>The addition of mock recall to this element, doesn't make any sense. A mock recall doesn't have a root cause (as it's not a real recall) other than that the system is being tested.</p> <p>We think they may be trying to say that any failures found in a mock recall, should be investigated to root cause and actions documented and implemented.</p>
2.6.3.3	The product withdrawal and recall system shall be reviewed, tested and verified as effective at least annually.	2.6.3.3	The product withdrawal and recall system shall be reviewed, tested and verified as effective at least annually. <b>Testing shall include incoming materials (one step back) and finished product (one up).</b>	Clarified that the test must include a trace backwards to incoming materials and forwards for finished product.
		<b>2.6.3.4</b>	<b>SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at <a href="mailto:foodsafetycrisis@sqfi.com">foodsafetycrisis@sqfi.com</a>.</b>	<p>New element.</p> <p>Repeated information from 2.4.1.3</p>
2.6.3.4	Records of all product withdrawals, recalls and mock recalls shall be maintained.	<b>2.6.3.5</b>	Records of all product withdrawals, recalls and mock recalls shall be maintained.	<p>Formerly 2.6.3.4.</p> <p>No change.</p>
<b>2.7</b>	<b>Site Security</b>	<b>2.7</b>	<b>Food Defense and Food Fraud</b>	Changed header.
<b>2.7.1</b>	<b>Food Defense (M)</b>	<b>2.7.1</b>	<b>Food Defense Plan (Mandatory)</b>	Changed header.
2.7.1.1.	The methods, responsibility and criteria for preventing food adulteration caused by a deliberate act of	2.7.1.1.	The methods, responsibility and criteria for preventing food adulteration caused by a deliberate act of	No change.

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### Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	sabotage or terrorist-like incident shall be documented, implemented and maintained.		sabotage or terrorist-like incident shall be documented, implemented and maintained.	
2.7.1.2.	<p>A food defense <b>protocol</b> shall be prepared and include:</p> <ul style="list-style-type: none"> <li>i. The name of the senior management person responsible for food defense;</li> <li>ii. The methods implemented to ensure only authorized personnel have access to <b>crops</b>, production equipment and vehicles, manufacturing and storage areas through designated access points;</li> <li>iii. The methods implemented to protect sensitive processing points from intentional adulteration;</li> <li>iv. The measures taken to ensure the secure storage of raw materials, packaging, equipment and hazardous chemicals;</li> <li>v. The measures implemented to ensure <b>harvested crop and/or</b> finished product is held under secure storage and transportation conditions; and</li> <li>vi. The methods implemented to record and control access to the premises by employees, contractors, and visitors.</li> </ul>	2.7.1.2.	<p>A food defense <b>plan</b> shall include:</p> <ul style="list-style-type: none"> <li>i. The name of the senior site management person responsible for food defense;</li> <li>ii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing and storage areas through designated access points;</li> <li>iii. The methods implemented to protect sensitive processing points from intentional adulteration;</li> <li>iv. The measures taken to ensure the secure <b>receipt and</b> storage of raw materials, packaging, equipment and hazardous chemicals;</li> <li>v. The measures implemented to ensure <b>raw materials, ingredients, packaging materials, work-in progress, process inputs and</b> finished products are held under secure storage and transportation conditions; and</li> <li>vi. The methods implemented to record and control access to the premises by employees, contractors, and visitors.</li> </ul>	<p>Terminology changed from protocol to plan.</p> <p>Harvested crop removed, as this is not relevant for this Code.</p> <p>Clarified that raw materials which include ingredients and packaging materials, work-in-progress and process inputs are included.</p>
		2.7.1.3	The food defense plan shall be reviewed and challenged at least annually.	New element.
		2.7.1.4	Records of reviews of the food defense plan shall be maintained.	New element.
2.7.2		2.7.2	<b>Food Fraud</b>	New section.



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	Edition 7		Edition 8	Comments
		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 and counterfeiting which may adversely impact food safety.	New element.
		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.	New element.
		2.7.2.3	The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually.	New element.
		2.7.2.4	Records of reviews of the food fraud vulnerability assessment and mitigation plan shall be maintained.	New element.
2.8	Identity Preserved Foods	2.8	Identity Preserved Foods	Section removed. Applicable only to quality.
2.8.1	General Requirements for Identity Preserved Foods	2.8.1	General Requirements for Identity Preserved Foods	Section removed. Applicable only to quality.
2.8.1.1	The methods and responsibility for the identification and processing of Kosher, HALAL, organic, Genetically Modified Organisms (GMO) food and other products requiring the preservation of their identity preserved status shall be documented and implemented.			
2.8.1.2	Identification shall include a statement of the product's identity preserved status of all ingredients, including additives, preservatives, processing aids and flavorings.			
2.8.1.3	Raw material and ingredient specifications to identity preserved foods shall include requirements for their handling, transport, storage and delivery prior to use.			

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	Edition 7		Edition 8	Comments
2.8.1.4	Assurances concerning the raw material or ingredient's identity preserved status shall be by agreement with the supplier.			
2.8.1.5	The process description shall allow for a product's identity preserved status to be maintained during manufacturing.			
2.8.1.6	The processing of identity preserved foods shall be conducted under controlled conditions such that: i. Ingredients are physically separated from ingredients identified as incompatible with the identity preserved food; ii. Processing is completed in separate rooms; or scheduled as the first production run; or carried out after the completion of a thorough sanitation of the area and equipment; and iii. Finished product is stored and transported in separate units or isolated by a physical barrier from non-specialty product.			
2.8.1.7	The identity preserved status shall be declared in accordance with current legal requirements.			
2.8.1.8	Customer requirements concerning identity preserved foods shall be included in the finished product specification described in 2.3.5, or label register, and implemented by the supplier.			
		<b>2.8</b>	<b>Allergen Management</b>	
<b>2.8.2</b>	<b>Allergen Management</b>	<b>2.8.1</b>	<b>Allergen Management for Food Manufacturing (Mandatory)</b>	Changed header.
2.8.2.1	The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and	2.8.1.1	The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and	Element restructured into the clauses below.

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	Edition 7		Edition 8	Comments
	<p>implemented. The allergen management program shall include:</p> <ul style="list-style-type: none"> <li>i. A risk analysis of those raw materials, ingredients and processing aids, including food grade lubricants, that contain allergens;</li> <li>ii. A register of allergens which is applicable in the country of manufacture and the country(ies) of destination;</li> <li>iii. A list of allergens which is accessible by relevant staff.</li> <li>iv. The hazards associated with allergens and their control incorporated into the food safety plan.</li> <li>v. Instructions on how to identify, handle, store and segregate raw materials containing allergens provided to staff responsible for receiving those target raw materials.</li> <li>vi. Provision to clearly identify and segregate foods that contain allergens.</li> <li>vii. Cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross contact.</li> <li>viii. Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be effectively implemented.</li> </ul>		<p>implemented. The allergen management program shall include:</p> <ul style="list-style-type: none"> <li>i. A risk analysis of those raw materials, ingredients and processing aids, including food grade lubricants, that contain food allergens;</li> <li>ii. An assessment of workplace-related food allergens from locker rooms, vending machines, lunch rooms, visitors;</li> <li>iii. A register of allergens which is applicable in the country of manufacture and the country(ies) of destination if known;</li> <li>iv. A list of allergens which is accessible by relevant staff.</li> <li>v. The hazards associated with allergens and their control incorporated into the food safety plan.</li> <li>vi. A management plan for control of identified allergens.</li> </ul> <p>The allergen management program shall include the identification, management, and labeling of products containing gluten, where applicable.</p>	<p>Clarification that allergens must include gluten.</p>

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### Changes from Edition 7 to Edition 8



	Edition 7		Edition 8	Comments
	ix. Separate handling and production equipment where satisfactory line hygiene and clean-up or segregation is not possible.			
		2.8.1.2	Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in progress, rework or finished product on how to identify, handle, store and segregate raw materials containing allergens.	Moved from 28.8.2.1.v  Element reworded to provide additional clarification.
		2.8.1.3	Provision shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored.	Moved from 28.8.2.1.v  Element reworded to provide additional clarification.
		2.8.1.4	Where allergenic material may be intentionally or unintentionally present, cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross contact. Separate handling and production equipment shall be provided where satisfactory line hygiene and clean-up or segregation is not possible.	Moved from 28.8.2.1.vii  Element reworded to provide additional clarification.
		2.8.1.5	Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be effectively implemented.	Moved from 28.8.2.1.viii  Areas and equipment added for clarification for the types of cleans.
		2.8.1.6	Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact.	Moved from 28.8.2.1.ix  Element reworded.

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	<b>Edition 7</b>		<b>Edition 8</b>	<b>Comments</b>
2.8.2.2	The product identification system shall make provision for clear identification and labeling in accordance with regulatory requirements of those products produced on production lines and equipment on which foods containing allergens were manufactured.	2.8.1.7	The product identification system shall make provision for clear identification and labeling in accordance with regulatory requirements of those products produced on production lines and equipment on which foods containing allergens were manufactured.	Formerly 2.8.2.2.  No change.
		2.8.1.8	The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work in progress and finished product is true to label with regard to allergens. Such measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels and verification of labels on finished product as appropriate and product change over procedures.	New element.
2.8.2.3	The product trace system shall take into consideration the conditions under which allergen containing foods are manufactured and ensure full trace back of all ingredients used.	2.8.1.9	The product trace system shall take into consideration the conditions under which allergen containing foods are manufactured and ensure full trace back of all ingredients and processing aids used.	Formerly 2.8.2.3.  Clarification that processing aids must be included.
2.8.2.4	Re-working of product containing allergen causing agents shall be conducted under conditions that ensure product safety and integrity is maintained. Re-worked product containing allergens shall be clearly identified and traceable.	2.8.1.10	Re-working of product containing food allergen shall be conducted under conditions that ensure product safety and integrity is maintained. Re-worked product containing allergens shall be clearly identified and traceable.	Formerly 2.8.2.4.  Addition of the word 'food'.
		2.8.1.11	Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introducing unintended allergens through supplier, contract manufacturer, employee and visitor activities.	New element.
<b>2.9</b>	<b>Training</b>	<b>2.9</b>	<b>Training</b>	

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	Edition 7		Edition 8	Comments
<b>2.9.1</b>	<b>Training Requirements</b>	<b>2.9.1</b>	<b>Training Requirements</b>	
		<b>2.9.1.1</b>	The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented.	New element for this section, repeated from 2.1.2.6 in Edition 7 (which was updated for Edition 8 – see current 2.1.2.6)
2.9.1.1	Appropriate training shall be provided for personnel carrying out the tasks <b>critical</b> to the effective implementation of the SQF <b>level 2</b> System and the maintenance of food safety and regulatory requirements.	<b>2.9.1.2</b>	Appropriate training shall be provided for personnel carrying out the tasks <b>essential</b> to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.	Formerly 2.9.1.1.  Terminology updated to clarify that it covers all tasks required to meet the Code.
<b>2.9.2</b>	<b>Training Program (M)</b>	<b>2.9.2</b>	<b>Training Program (Mandatory)</b>	No change.
2.9.2.1	An employee training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: <ul style="list-style-type: none"> <li>i. Developing and applying <b>Good Agricultural Practices, Good Aquaculture Practices, or</b> Good Manufacturing Practices (as appropriate).</li> <li>ii. Applying food regulatory requirements;</li> <li>iii. Steps identified by the hazard analysis and/or other instructions as critical to effective implementation of the food safety plan and the maintenance of food safety; and</li> <li>iv. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF System.</li> </ul>	2.9.2.1	An employee training program shall be documented and implemented. It shall outline the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: <ul style="list-style-type: none"> <li>i. Developing and applying Good Manufacturing Practices</li> <li>ii. Applying food regulatory requirements;</li> <li>iii. Steps identified by the hazard analysis and/or other instructions as critical to effective implementation of the food safety plan and the maintenance of food safety; and</li> <li>iv. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF System.</li> </ul>	Removal of references which are relevant to other Codes.
<b>2.9.3</b>	<b>Instructions</b>	<b>2.9.3</b>	<b>Instructions</b>	No change.

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	<b>Edition 7</b>		<b>Edition 8</b>	<b>Comments</b>
2.9.3.1	Instructions shall be available explaining how all tasks critical to meeting regulatory compliance, the maintenance of food safety and process efficiency are to be performed.	2.9.3.1	Instructions shall be available <b>in the languages relevant to the staff</b> , explaining how all tasks critical to meeting regulatory compliance, the maintenance of food safety and process efficiency are to be performed.	The addition of the requirement of having instructions in relevant languages.
<b>2.9.4</b>	<b>HACCP Training Requirements</b>	<b>2.9.4</b>	<b>HACCP Training Requirements</b>	No change.
2.9.4.1	HACCP training shall be provided for staff involved in developing and maintaining food safety plans.	2.9.4.1	HACCP training shall be provided for staff involved in developing and maintaining food safety plans.	No change.
<b>2.9.5</b>	<b>Language</b>	<b>2.9.5</b>	<b>Language</b>	No change.
2.9.5.1	Training materials and the delivery of training shall be provided in language understood by staff.	2.9.5.1	Training materials and the delivery of training shall be provided in language understood by staff.	No change.
<b>2.9.6</b>	<b>Refresher Training</b>	<b>2.9.6</b>	<b>Refresher Training</b>	No change.
2.9.6.1	The training program shall include provision for identifying and implementing the refresher training needs of the organization.	2.9.6.1	The training program shall include provision for identifying and implementing the refresher training needs of the organization.	No change.
<b>2.9.7</b>	<b>Training Skills Register</b>	<b>2.9.7</b>	<b>Training Skills Register</b>	No change.
2.9.7.1	A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the: <ul style="list-style-type: none"> <li>i. Participant name;</li> <li>ii. Skills description;</li> <li>iii. Description of the training provided;</li> <li>iv. Date training completed;</li> <li>v. Trainer or training provider; and</li> <li>vi. Supervisor's verification the training was completed and that the trainee is competent to complete the required tasks.</li> </ul>	2.9.7.1	A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the: <ul style="list-style-type: none"> <li>i. Participant name;</li> <li>ii. Skills description;</li> <li>iii. Description of the training provided;</li> <li>iv. Date training completed;</li> <li>v. Trainer or training provider; and</li> <li>vi. Supervisor's verification the training was completed and that the trainee is competent to complete the required tasks.</li> </ul>	No change.

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### SQF Good Manufacturing Practices for Food Safety Code for Manufacturing

<b>11.1</b>	<b>Site Requirements and Approval</b>	<b>11.1</b>	<b>Site Location and Construction</b>	Changed header.
<b>11.1.1</b>	<b>Premises Location</b>	<b>11.1.1</b>	<b>Premises Location and Approval</b>	Changed header.
11.1.1.1	The location of the premises shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations.	11.1.1.1	The location of the premises shall be such that adjacent and adjoining buildings, operations and land use do not interfere with safe and hygienic operations.	No change.
<b>11.1.1.2</b>	Measures shall be established to maintain a suitable external environment, and the effectiveness of the established measures shall be monitored and periodically reviewed			Moved to 11.10.
<b>11.1.2</b>	<b>Construction and Operational Approval</b>			Removed header and consolidated with 11.1.
11.1.2.1	The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.	<b>11.1.1.2</b>	The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.	Formerly 11.1.2.1.
<b>11.2</b>	<b>Construction and Control of Product Handling and Storage Areas</b>	<b>11.2</b>	<b>Construction of Premises and Equipment</b>	Changed header.
<b>11.2.1</b>	<b>Materials and Surfaces</b>	<b>11.2.1</b>	<b>Materials and Surfaces</b>	No change.
11.2.1.1	Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging material storage, and cold	11.2.1.1	Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging material storage, and cold	No change.



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	storage areas shall be constructed of materials that will not contribute a food safety risk.		storage areas shall be constructed of materials that will not contribute a food safety risk.	
<b>11.2.2</b>	<b>Floors, Drains, and Waste Traps</b>	<b>11.2.2</b>	<b>Floors, Drains, and Waste Traps</b>	No change.
11.2.2.1	Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned.	11.2.2.1	Floors shall be constructed of smooth, dense impact resistant material that can be effectively graded, drained, impervious to liquid and easily cleaned.	No change.
11.2.2.2	Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or waste water under normal working conditions.	11.2.2.2	Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or waste water under normal working conditions.	No change.
11.2.2.3	Drains shall be constructed and located so they can be easily cleaned and not present a hazard.	11.2.2.3	Drains shall be constructed and located so they can be easily cleaned and not present a hazard.	No change.
11.2.2.4	Waste trap system shall be located away from any food handling area or entrance to the premises.	11.2.2.4	Waste trap system shall be located away from any food handling area or entrance to the premises.	No change.
<b>11.2.3</b>	<b>Walls, Partitions, Floors and Ceilings</b>	<b>11.2.3</b>	<b>Walls, Partitions, Doors and Ceilings</b>	No change.
11.2.3.1	Walls, partitions, ceilings and doors shall be of durable construction. Internal surfaces shall be smooth and impervious with a light colored finish, and shall be kept clean (refer to element 11.2.13.1)	11.2.3.1	Walls, partitions, ceilings and doors shall be of durable construction. Internal surfaces shall be smooth and impervious with a light colored finish, and shall be kept clean (refer to element 11.2.13.1).	No change.
11.2.3.2	Wall to wall and wall to floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.	11.2.3.2	Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.	No change.
11.2.3.3	Ducting, conduit and pipes that convey services such as steam or water shall be designed and constructed so as to allow ease of cleaning.	11.2.3.3	Ducting, conduit and pipes that convey services such as steam or water shall be designed and constructed so as to prevent the contamination of food, ingredients and food contact surfaces and allow ease of cleaning.	Clarification that construction should prevent contamination as well as provide ease of cleaning.
		<b>11.2.3.4</b>	<b>Pipes carrying sanitary waste or waste water that are located directly over product lines or storage areas shall be designed and constructed so as to prevent the</b>	New element.

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			contamination of food, materials, ingredients and food contact surfaces, and shall allow ease of cleaning.	
11.2.3.4	Doors, hatches and windows and their frames shall be of a material and construction which meets the same functional requirements for internal walls and partitions. <b>i.</b> Doors and hatches shall be of solid construction; and <b>ii.</b> Windows shall be made of shatterproof glass or similar material.	11.2.3.5	Doors, hatches and windows and their frames <b>in food processing, handling or storage areas</b> shall be of a material and construction which meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction and windows shall be made of shatterproof glass or similar material.	Formerly 11.2.3.4  Clarification that this element refers to doors, hatches and windows in food processing, handling and storage areas.  Correction to the grammar.
11.2.3.5	<b>Food</b> shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products.	11.2.3.6	<b>Product</b> shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products.	Formerly 11.2.3.5  Changed "product" to "food".
11.2.3.6	Drop ceilings shall be <b>additionally</b> constructed to enable monitoring for pest activity, facilitate cleaning and provide access to utilities.	11.2.3.7	Drop ceilings shall be constructed to enable monitoring for pest activity, facilitate cleaning and provide access to utilities.	Formerly 11.2.3.6  Removed "additionally."
<b>11.2.4</b>	<b>Stairs, Catwalks and Platforms</b>	<b>11.2.4</b>	<b>Stairs, Catwalks and Platforms</b>	No change.
11.2.4.1	Stairs, catwalks and platforms in food processing and handling areas shall be designed and constructed so as not to present a product contamination risk, and shall be kept clean (refer to element 11.2.13.1).	11.2.4.1	Stairs, catwalks and platforms in food processing and handling areas shall be designed and constructed so as not to present a product contamination risk, <b>and with no open grates directly above exposed food product surfaces.</b> They shall be kept clean (refer to element 11.2.13.1).	Added extra requirement that there should be no open grates directly above exposed food product surfaces.
<b>11.2.5</b>	<b>Lightings and Light Fittings</b>	<b>11.2.5</b>	<b>Lightings and Light Fittings</b>	No change.
11.2.5.1	Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.	11.2.5.1	Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively.	No change.

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11.2.5.2	Light fittings in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling. Where fittings cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials and addressed in the cleaning and sanitation program.	11.2.5.2	Light fittings in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers and recessed into or fitted flush with the ceiling. Where fittings cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials and addressed in the cleaning and sanitation program.	No change.
11.2.5.3	Light fittings in warehouses and other areas where the product is protected shall be designed such as to prevent breakage and product contamination.	11.2.5.3	Light fittings in warehouses and other areas where the product is protected shall be designed such as to prevent breakage and product contamination.	No change.
<b>11.2.6</b>	<b>Inspection Area</b>	<b>11.2.6</b>	<b>Inspection / Quality Control Area</b>	Changed header.
11.2.6.1	A suitable area within the processing area shall be provided for the inspection of the product if required.	11.2.6.1	A suitable area shall be provided for the inspection of the product if required.	"Within the processing area" removed to state that inspection areas do not need to be in the processing area.
11.2.6.2	The inspection area shall be provided with facilities that are suitable for examination of the style of product being processed. The inspection area shall have: <ul style="list-style-type: none"> <li>i. Easy access to hand washing facilities; and</li> <li>ii. Sufficient lighting intensity to enable as thorough inspection of the product as required.</li> </ul>	11.2.6.2	The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: <ul style="list-style-type: none"> <li>i. Have easy access to hand washing facilities;</li> <li>ii. Have appropriate waste handling and removal; and</li> <li>iii. Be kept clean to prevent product contamination.</li> </ul>	Added requirements for waste and cleanliness of the area.  Removed the need for lighting (addressed in 11.2.5.1).  Amended some of the description words, although the means stays the same.
<b>11.2.7</b>	<b>Dust, Fly, and Vermin Proofing</b>	<b>11.2.7</b>	<b>Dust, Insect, and Pest Proofing</b>	Changed "vermin" to "pests" as pest control is more widely used terminology in the industry. Changed "flies" to "insects" to

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				incorporate all insects, not just flies.
11.2.7.1	All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed and proofed against dust, vermin and flies.	11.2.7.1	All external windows, ventilation openings, doors and other openings shall be effectively sealed when closed and proofed against dust, vermin and <b>other pests</b> .	<p>Changed "flies" to "other pests".</p> <p>This clause change doesn't really make sense as in the title they have changed the terminology from vermin to pests. What I think is meant is, 'dust, pests and other insects'.</p>
11.2.7.2	Personnel access doors shall be provided. They shall be effectively fly-proofed and fitted with a self-closing device.	11.2.7.2	<b>External</b> personnel access doors shall be provided. They shall be effectively insect-proofed and fitted with a self-closing device and proper seals <b>to protect against ingress of dust, vermin and other pests</b> .	<p>Added "to protect against ingress of dust, vermin and other pests"</p> <p>Again, after changing terminology in the section title, what I think is meant is, 'dust, pests and other insects'.</p> <p>Clarified location of doors.</p> <p>It is the external doors which this clause needs complying with.</p>
11.2.7.3	External doors, including overhead dock doors in food handling areas, used for product, pedestrian or truck access shall be fly-proofed by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A fly-proof screen;	11.2.7.3	External doors, including overhead dock doors in food handling areas used for product, pedestrian or truck access shall be insect-proofed by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. An <b>insect-proof</b> screen;	<p>Changed "fly-proofed" to "insect-proofed"</p> <p>This is to clarify all 'insects' are to be included, not just flies.</p>

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	iv. A fly-proof annex. v. Adequate sealing around trucks in docking areas		iv. An <b>insect-proof</b> annex; v. Adequate sealing around trucks in docking areas.	
11.2.7.4	Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to the product, packaging, containers or processing equipment. Poison bait shall not be used inside ingredient or food storage areas or processing areas.	11.2.7.4	Electric insect control devices, pheromone or other traps and baits shall be located so as not to present a contamination risk to the product, packaging, containers or processing equipment. <b>Poison rodenticide bait</b> shall not be used inside ingredient or product storage areas or processing areas.	Changed "poison bait" to "Poison rodenticide bait" this is to clarify that the bait used inside the areas specified should not be toxic.
<b>11.2.8</b>	<b>Ventilation</b>	<b>11.2.8</b>	<b>Ventilation</b>	No change.
11.2.8.1	Adequate ventilation shall be provided in enclosed processing and food handling areas.	11.2.8.1	Adequate ventilation shall be provided in enclosed processing and food handling areas.	No change.
		<b>11.2.8.2</b>	<b>All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.12, to prevent unsanitary conditions.</b>	This is a new clause which has been added to ensure that cleaning of the ventilation systems is incorporated onto a cleaning schedule.
11.2.8.2	Extractor fans and canopies shall be provided in areas where cooking operations are carried out or a large amount of steam is generated and shall have the following features: i. Capture velocities shall be sufficient to prevent condensation build up and to evacuate all heat, fumes and other aerosols to the exterior via an exhaust hood positioned over cooker; ii. Fans and exhaust vents shall be fly proofed and located so as not to pose a contamination risk; and iii. Where appropriate, positive air-pressure system shall be installed to prevent airborne contamination.	<b>11.2.8.3</b>	Extractor fans and canopies shall be provided in areas where cooking operations are carried out or a large amount of steam is generated and shall have the following features: i. Capture velocities shall be sufficient to prevent condensation build up and to evacuate all heat, fumes and other aerosols to the exterior via an exhaust hood positioned over cooker; ii. Fans and exhaust vents shall be <b>insect</b> -proofed and located so as not to pose a contamination risk; and iii. Where appropriate, positive air-pressure system shall be installed to prevent airborne contamination.	Formerly 11.2.8.2. Changed "fly" to "insect" to ensure that all insects are included, not just flies.
		<b>11.2.9</b>	<b>Equipment, Utensils, and Protective Clothing</b>	Formerly 11.2.12

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		11.2.9.1	Specifications for equipment, utensils and protective clothing, and procedures for purchasing equipment shall be documented and implemented.	<p>New element.</p> <p>This is a new clause to ensure when purchasing equipment and utensils you attain a specification or data sheet to evidence they are suitable for use in contact with food and the PPE is a suitable design for use in a food manufacturing site. It also means you must have a procedure to follow to ensure the process for purchasing new equipment and PPE is adhered to.</p>
		11.2.9.2	Equipment and utensils shall be designed, constructed, installed, operated and maintained so as to meet any applicable regulatory requirements and not to pose a contamination threat to products.	<p>Formerly 11.2.12.1.</p> <p>Added "as to meet any applicable regulatory requirements"</p> <p>Any regulatory requirements such as food contact equipment are made of food safe materials, food grade lubricant</p>
		11.2.9.3	Benches, tables, conveyors, mixers, mincers, graders and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious and free from cracks or crevices.	<p>Formerly 11.2.12.2.</p> <p>No change.</p>
		11.2.9.4	Product containers, tubs, bins for edible and inedible material shall be constructed of materials that are non-	Formerly 11.2.12.3.

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			toxic, smooth, impervious and readily cleaned <b>as per 11.2.13</b> . Bins used for inedible material shall be clearly identified.	Added "and readily cleaned as per 11.2.13"
		<b>11.2.9.5</b>	Waste and overflow water from tubs, tanks and other equipment shall be discharged direct to the floor drainage system, <b>and to meet local regulatory requirements</b> .	Formerly 11.2.12.4.  Added "and to meet local regulatory requirements"
		<b>11.2.9.6</b>	Protective clothing shall be manufactured from material that <b>will not</b> contaminate food and is easily cleaned.	Formerly 11.2.12.5.  Amended "liable to" with "will not" contaminate food.
		<b>11.2.9.7</b>	Racks shall be provided for the temporary storage of protective clothing when staff leaves the processing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.	Formerly 11.2.12.6.  No change.
		<b>11.2.9.8</b>	<b>All equipment, utensils and protective clothing shall be cleaned after use or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.</b>	New element.
<b>11.2.9</b>	<b>Premises and Equipment Maintenance</b>	<b>11.2.10</b>	<b>Premises and Equipment Maintenance</b>	Element reference amended to 11.2.10.
11.2.9.1	The methods and responsibility for the maintenance and repair of plant, equipment and buildings shall be documented, planned and <b>carried out</b> in a manner that minimizes the risk of product, packaging or equipment contamination.	<b>11.2.10.1</b>	The methods and responsibility for the maintenance and repair of plant, equipment and buildings shall be documented, planned and <b>implemented</b> in a manner that minimizes the risk of product, packaging or equipment contamination.	Formerly 11.2.9.1.  Amended the wording "carried out" to "implemented".

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11.2.9.2	<p>Maintenance staff and contractors shall observe the following practices when undertaking maintenance and repairs in any food processing, handling or storage area:</p> <ul style="list-style-type: none"> <li>i. Routine maintenance of plant and equipment shall be performed according to a maintenance-control schedule and recorded;</li> <li>ii. Failures of plant and equipment shall be documented, reviewed and their repair incorporated into the maintenance control schedule;</li> <li>iii. Compliance with the personnel and process hygiene requirements (refer to elements 11.3.1, 11.3.2, 11.3.3, 11.3.4) by maintenance staff and contractors;</li> <li>iv. Ensure facility supervisors are notified when maintenance or repairs are to be undertaken in any food handling area;</li> <li>v. Inform the maintenance supervisor and the facility supervisor if any repairs or maintenance pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside processing times;</li> <li>vi. Remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed prior to the commencement of facility operations.</li> </ul>	11.2.10.2	<p>Routine maintenance of plant and equipment in any food processing, handling or storage area shall be performed according to a maintenance-control schedule and recorded.</p> <p>The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance of product safety and quality.</p>	<p>Formerly 11.2.9.2i &amp; 11.2.9.3.</p> <p>This element has been split out into its individual parts, below.</p> <p>Clarification that this element only refers to plant and equipment in food processing, handling and storage areas.</p>
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11.2.9.3	The maintenance schedule shall be prepared to cover building, equipment and other areas of the premises critical to the maintenance of product safety and quality.			Incorporated into 11.2.10.2.
		11.2.10.3	Failures of plant and equipment in any food processing, handling or storage area shall be documented, reviewed and their repair incorporated into the maintenance control schedule.	Formerly 11.2.9.2ii.  Clarification that this element only refers to plant and equipment in food processing, handling and storage areas.
		11.2.10.4	Maintenance staff and contractors shall comply with the facility's personnel and process hygiene requirements (refer to elements 11.3.1, 11.3.2, 11.3.3, 11.3.4).	Formerly 11.2.9.2 iii.  This clause has been reworded to ensure the clauses mention in the personal hygiene section are adhered to by maintenance and contractors, now just a clause of its own.
		11.2.10.5	All maintenance and other engineering contractors required to work on site shall be trained in the site's food safety and hygiene procedures, or shall be escorted at all times, until their work is completed.	New element.  This clause dictates you must either induct your contractors or they must be accompanied at all times.
		11.2.10.6	Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling or storage area.	Formerly 11.2.9.2 iv.
		11.2.10.7	The maintenance supervisor and the facility supervisor shall be informed if any repairs or maintenance pose a potential threat to product safety (i.e. pieces of electrical wire, damaged light fittings, and loose	Formerly 11.2.9.2 v.

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			overhead fittings). When possible, maintenance is to be conducted outside processing times.	
		11.2.10.8	Temporary repairs, where required shall not pose a food safety risk and shall be included in the cleaning program. There shall be a plan in place to address final completion of temporary repairs in order to ensure they do not become permanent solutions.	<p>New element.</p> <p>This clause dictates temporary repairs must be documented on a maintenance plan and followed through with a permanent solution.</p> <p>Larger scale 'temporary repairs' such as structural changes or new pieces of equipment being installed, may require putting onto a cleaning regime. This is to ensure that cleaning is incorporated into the stages of implementation to prevent contamination of other areas of the site.</p>
		11.2.10.9	Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed and inform the area supervisor and maintenance supervisor so appropriate hygiene and sanitation can be completed and a pre-operational inspection conducted prior to the commencement of site operations.	<p>Formerly 11.2.9.2 vi. Added "and a pre-operational inspection conducted"</p> <p>Clarification that a check prior to the release of an area or piece of equipment, back for use after maintenance work has been carried out.</p>
11.2.9.4	Equipment located over product or product conveyors shall be lubricated with food grade lubricants and their	11.2.10.10	Equipment located over product or product conveyors shall be lubricated with food grade lubricants and their	Formerly 11.2.9.4. No change.

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	use controlled so as to minimize the contamination of the product.		use controlled so as to minimize the contamination of the product.	
11.2.9.5	Paint used in a food handling or contact zone shall be suitable for use and in good condition and shall not be used on any product contact surface	11.2.10.11	Paint used in a food handling or contact zone shall be suitable for use and in good condition and shall not be used on any product contact surface.	Formerly 11.2.9.5. No change.
<b>11.2.10</b>	<b>Calibration</b>	<b>11.2.11</b>	<b>Calibration</b>	Formerly 11.2.10. No change.
11.2.10.1	The methods and responsibility for the calibration and re-calibration of measuring, test and inspection equipment used for monitoring activities outlined in pre-requisite program, food safety plans and food quality plans and other process controls, or to demonstrate compliance with customer specifications shall be documented and implemented.	11.2.11.1	The methods and responsibility for the calibration and re-calibration of measuring, test and inspection equipment used for monitoring activities outlined in pre-requisite program, food safety plans and food quality plans and other process controls, or to demonstrate compliance with customer specifications shall be documented and implemented. <b>Software used for such activities shall be validated as appropriate.</b>	Formerly 11.2.10.1. Added "Software used for such activities shall be validated as appropriate."
11.2.10.2	Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, test and inspection equipment be found to be out of calibration state.	11.2.11.2	Procedures shall be documented and implemented to address the disposition of potentially affected products should measuring, test and inspection equipment be found to be out of calibration state.	Formerly 11.2.10.2. No change.
11.2.10.3	Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment.	11.2.11.3	Calibrated measuring, test and inspected equipment shall be protected from damage and unauthorized adjustment.	Formerly 11.2.10.3. No change.
11.2.10.4	Equipment shall be calibrated against national or international reference standards and methods or to accuracy appropriate to its use. In cases where standards are not available, the supplier shall provide evidence to support the calibration reference method applied.	11.2.11.4	Equipment shall be calibrated against national or international reference standards and methods or to accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.	Formerly 11.2.10.4. No change.
11.2.10.5	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers recommended schedule.	11.2.11.5	Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers recommended schedule.	Formerly 11.2.10.5. No change.

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11.2.10.6	Calibration records shall be maintained.	11.2.11.6	Calibration records shall be maintained.	Formerly 11.2.10.6. No change.
11.2.11	<b>Management of Pests and Vermin</b>	11.2.12	<b>Pest Prevention</b>	Formerly 11.2.11. Changed from "Management" to "Prevention" Incorporated "Vermin" into "Pests"
11.2.11.1	The methods and responsibility for integrated pest management shall be documented and effectively implemented. The premises, its surrounding areas, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests and vermin.	11.2.12.1	The methods and responsibility for <b>pest prevention</b> shall be documented and effectively implemented. The premises, its surrounding areas, storage facilities, machinery and equipment shall be kept free of waste or accumulated debris so as not to attract pests and vermin.	Changed "integrated pest management" to "pest prevention"  Clarification that pest prevention is required rather than just managing pests.
		11.2.12.2	<b>Identified pest activity shall not present a risk of contamination to food products, raw materials or packaging.</b>	New element. An additional clause to ensure that when pest activity is found on site, that measures are taken to remove further risk to product/raw material and packaging.
		11.2.12.3	<b>Food products, raw materials or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.</b>	New element. This clause has been added to make sure you identify and document product put to waste from pest infestation along with the corrective action, root cause and preventative actions taken.
11.2.11.2	The pest and vermin management program shall:	11.2.12.4	The pest prevention program shall:	Formerly 11.2.11.2. Changed second bullet to

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	<ul style="list-style-type: none"> <li>i. Describe the methods and responsibility for the development, implementation and maintenance of the pest and vermin management program;</li> <li>ii. Identify the target pests for each pesticide application;</li> <li>iii. Outline the methods used to prevent pest problems;</li> <li>iv. Outline the pest elimination methods;</li> <li>v. Outline the frequency with which pest status is to be checked;</li> <li>vi. Include on a site map the identification, location, number and type of bait stations set;</li> <li>vii. List the chemicals used (they are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available);</li> <li>viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come in contact with a bait station;</li> <li>ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and</li> <li>x. Measure the effectiveness of the program to verify the elimination of applicable pests.</li> </ul>		<ul style="list-style-type: none"> <li>i. Describe the methods and responsibility for the development, implementation and maintenance of the pest prevention program;</li> <li>ii. <b>Record pest sightings and trend the frequency of pest activity to target pesticide applications;</b></li> <li>iii. Outline the methods used to prevent pest problems;</li> <li>iv. Outline the pest elimination methods;</li> <li>v. Outline the frequency with which pest status is to be checked;</li> <li>vi. Include on a site map the identification, location, number and type of bait stations set;</li> <li>vii. List the chemicals used (they are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available);</li> <li>viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station;</li> <li>ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and</li> <li>x. Measure the effectiveness of the program to verify the elimination of applicable pests.</li> </ul>	<p>"Record pest sightings and trend the frequency of pest activity to target pesticide applications;"</p> <p>The addition of this wording is to make sure the pest sightings are documented, and that trend analysis is completed. This is to ensure that on reviews of pest control the areas which have higher trends can have additional pest control implemented.</p>
11.2.11.3	Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present.	<b>11.2.12.5</b>	Inspections for pest activity shall be undertaken on a regular basis by trained personnel and the appropriate action taken if pests are present.	Formerly 11.2.11.3. No change.
11.2.11.4	Records of all pest control applications shall be maintained.	<b>11.2.12.6</b>	Records of all pest control applications shall be maintained.	Formerly 11.2.11.4. No change.

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11.2.11.5	Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 11.6.4 and handled and applied by properly trained personnel. They shall be used by or under the direct supervision of trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.	11.2.12.7	Pesticides and other toxic chemicals shall be clearly labeled and stored as described in element 11.6.5 and handled and applied by properly trained personnel. They shall be used by or under the direct supervision of trained personnel with a thorough understanding of the hazards involved, including the potential for the contamination of food and food contact surfaces.	Formerly 11.2.11.5. Reference updated.
11.2.11.6	Pest control contractors shall be: <ul style="list-style-type: none"> <li>i. Licensed and approved by the local relevant authority;</li> <li>ii. Use only trained and qualified operators who comply with regulatory requirements;</li> <li>iii. Use only approved chemicals;</li> <li>iv. Provide a pest control management plan (see Contract Services 2.3.3) which will include a site map indicating the location of bait stations and traps;</li> <li>v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; and</li> <li>vi. Provide a written report of their findings and the inspections and treatments applied.</li> </ul>	11.2.12.8	Pest contractors shall be: <ul style="list-style-type: none"> <li>i. Licensed and approved by the local relevant authority;</li> <li>ii. Use only trained and qualified operators who comply with regulatory requirements;</li> <li>iii. Use only approved chemicals;</li> <li>iv. Provide a pest prevention plan (refer to 2.3.3) which will include and maintain a site map indicating the location of bait stations traps and other applicable pest control/monitoring devices;</li> <li>v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; and</li> <li>vi. Provide a written report of their findings and the inspections and treatments applied.</li> </ul>	Formerly 11.2.11.6. Changed "control" to "prevention" to clarify that prevention is better than control.
11.2.11.7	The supplier shall dispose of unused pest control chemicals and empty containers in accordance with regulatory requirements and ensure that: <ul style="list-style-type: none"> <li>i. Empty chemical containers are not reused;</li> <li>ii. Empty containers are labeled, isolated and securely stored while awaiting collection; and</li> <li>iii. Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.</li> </ul>	11.2.12.9	The site shall dispose of unused pest control chemicals and empty containers in accordance with regulatory requirements and ensure that: <ul style="list-style-type: none"> <li>i. Empty chemical containers are not reused;</li> <li>ii. Empty containers are labeled, isolated and securely stored while awaiting collection; and</li> <li>iii. Unused and obsolete chemicals are stored under secure conditions while waiting authorized disposal by an approved vendor.</li> </ul>	Formerly 11.2.11.7. No change.

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<b>11.2.12</b>	<b>Equipment, Utensils, and Protective Clothing</b>			Section moved to 11.2.9
11.2.12.1	Equipment and utensils shall be designed, constructed, installed, operated and maintained so as not to pose a contamination threat to products.			Moved to 11.2.9.2.
11.2.12.2	Benches, tables, conveyors, mixers, mincers, graders and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious and free from cracks or crevices.			Moved to 11.2.9.3.
11.2.12.3	Product containers, tubs, bins for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious and readily cleaned. Bins used for inedible material shall be clearly identified.			Moved to 11.2.9.4.
11.2.12.4	Waste and overflow water from tubs, tanks and other equipment shall be discharged direct to the floor drainage system.			Moved to 11.2.9.5.
11.2.12.5	Protective clothing shall be manufactured from material that is not liable to contaminate food and easily cleaned.			Moved to 11.2.9.6.
11.2.12.6	Racks shall be provided for the temporary storage of protective clothing when staff leaves the processing area and shall be provided in close proximity or adjacent to the personnel access doorways and hand washing facilities.			Moved to 11.2.9.7.
<b>11.2.13</b>	<b>Cleaning and Sanitation</b>	<b>11.2.13</b>	<b>Cleaning and Sanitation</b>	No change.
11.2.13.1	The methods and responsibility for the cleaning of the food handling and processing equipment and environment, storage areas, staff amenities and toilet	11.2.13.1	The methods and responsibility for the cleaning of the food handling and processing equipment and environment, storage areas, staff amenities and toilet	No change.

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	facilities shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Methods used to confirm the correct concentrations of detergents and sanitizers, and vi. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.		facilities shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Methods used to confirm and record the correct concentrations of detergents and sanitizers, and vi. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.	
11.2.13.2	Provision shall be made for the effective cleaning of processing equipment, utensils and protective clothing.	11.2.13.2	Provision shall be made for the effective cleaning of processing equipment, utensils and protective clothing.	No change.
11.2.13.3	Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards and other utensils and for cleaning of protective clothing used by staff. These cleaning operations shall be controlled so as not to interfere with manufacturing operations, equipment or product. Racks and containers for storing cleaned utensils and protective clothing shall be provided as required.	11.2.13.3	Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards and other utensils and for cleaning of protective clothing used by staff. These cleaning operations shall be controlled so as not to interfere with manufacturing operations, equipment or product. Racks and containers for storing cleaned utensils shall be provided as required.	No change.
11.2.13.4		11.2.13.4	Cleaning in place (CIP) systems where used shall not pose a chemical contamination risk to raw materials, ingredients or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored and recorded (e.g., chemical and concentration used, contact time and temperature). CIP equipment including spray balls shall be maintained and modifications to CIP equipment shall be validated.	New element.  Validation of the CIP system and the cleaning parameters is required, including rinse water for chemical residue.  Personnel using the system need to be trained.



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			Personnel engaged in CIP activities shall be effectively trained.	
11.2.13.4	Pre-operational hygiene and sanitation inspections shall be conducted by qualified personnel to ensure food processing areas, product contact surfaces, equipment, staff amenities and sanitary facilities and other essential areas are clean before the commencement of production	11.2.13.5	Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities and sanitary facilities and other essential areas are clean before the commencement of production. Pre-operational inspections shall be conducted by qualified personnel.	Formerly 11.2.13.4. Added "Pre-operational inspections shall be conducted by qualified personnel."  To evidence this, training of the personnel on carrying out inspections must be held on file. If this involves completing swab tests as a cleaning verification method, the training on performing swab must also be documented. It also suggests that the 'qualified personnel' could be a supervisor.
		11.2.13.6	Staff amenities, sanitary facilities and other essential areas shall be inspected by qualified personnel to ensure the areas are clean, at a defined frequency.	New element.  Verification of facility cleaning.
11.2.13.5	The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.	11.2.13.7	The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared.	Formerly 11.2.13.5.  No change.
11.2.13.6	Detergents and sanitizers shall be suitable for use in a food manufacturing environment, and purchased in accordance with applicable legislation. The organization shall ensure:	11.2.13.8	Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure:	Formerly 11.2.13.6.  Chemicals must be labelled in line with the local regulations.

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	<ul style="list-style-type: none"> <li>i. An inventory of all chemicals purchased and used shall be maintained;</li> <li>ii. Detergents and sanitizers are stored as outlined in element 11.6.4;</li> <li>iii. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and</li> <li>iv. Only trained staff handles sanitizers and detergents.</li> </ul>		<ul style="list-style-type: none"> <li>i. The site maintains a list of chemicals approved for use;</li> <li>ii. An inventory of all chemicals purchased and used shall be maintained;</li> <li>iii. Detergents and sanitizers are stored as outlined in element 11.6.4;</li> <li>iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and</li> <li>v. Only trained staff handles sanitizers and detergents.</li> </ul>	An approved chemical list is also now required.
		11.2.13.9	Detergents and sanitizers that have been mixed for use shall be correctly mixed according to manufacturer's instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.	<p>New element.</p> <p>Further labeling requirements. Chemical strength records are also needed.</p>
11.2.13.7	<p>The supplier shall dispose of unused detergents and sanitizers and empty containers in accordance with regulatory requirements and ensure that:</p> <ul style="list-style-type: none"> <li>i. Empty detergent and sanitizer containers are appropriately cleaned, treated and labeled before use;</li> <li>ii. Empty detergent and sanitizer containers are labeled, isolated and securely stored while awaiting collection; and</li> <li>iii. Unused and obsolete detergents and sanitizers are stored under secure conditions while waiting authorized disposal by an approved vendor.</li> </ul>	11.2.13.10	<p>The site shall dispose of unused detergents and sanitizers and empty containers in accordance with regulatory requirements and ensure that:</p> <ul style="list-style-type: none"> <li>i. Empty detergent and sanitizer containers are appropriately cleaned, treated and labeled before use;</li> <li>ii. Empty detergent and sanitizer containers are labeled, isolated and securely stored while awaiting collection; and</li> <li>iii. Unused and obsolete detergents and sanitizers are stored under secure conditions while waiting authorized disposal by an approved vendor.</li> </ul>	<p>Formerly 11.2.13.7.</p> <p>No change.</p>
11.2.13.8	A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.	11.2.13.11	A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.	<p>Formerly 11.2.13.8.</p> <p>No change.</p>

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<b>11.3</b>	<b>Personnel Hygiene and Welfare</b>	<b>11.3</b>	<b>Personnel Hygiene and Welfare</b>	No change.
<b>11.3.1</b>	<b>Personnel</b>	<b>11.3.1</b>	<b>Personnel</b>	No change.
11.3.1.1	Personnel suffering from infectious diseases or are carriers of any infectious disease shall not engage in product handling or processing operation.	11.3.1.1	Personnel suffering from infectious diseases or are carriers of any infectious disease shall not engage in product handling or processing operation.	No change.
		11.3.1.2	The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids from open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury which causes spillage of bodily fluid, properly trained employee shall ensure that all affected areas including handling and processing areas have been adequately cleaned and that all materials and products have been quarantined and disposed of.	New element.  Bodily fluids procedure and training now required.
11.3.1.2	Personnel with exposed cuts, sores or lesions shall not be engaged in handling or processing products or handling primary packaging materials or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored bandage containing a metal strip or an alternative suitable waterproof and colored dressing.	11.3.1.3	Personnel with exposed cuts, sores or lesions shall not be engaged in handling or processing products or handling primary packaging materials or food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored bandage containing a metal strip or an alternative suitable waterproof and colored dressing.	Formerly 11.3.1.2.  No change.
11.3.1.3	Smoking, chewing, eating, drinking or spitting is not permitted in any food processing or food handling areas.	11.3.1.4	Smoking, chewing, eating, drinking or spitting is not permitted in any food processing or food handling areas.	Formerly 11.3.1.3.  No change.
<b>11.3.2</b>	<b>Hand Washing</b>	<b>11.3.2</b>	<b>Hand Washing</b>	No change.
11.3.2.1	Hand wash basins shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.	11.3.2.1	Hand wash basins shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.	No change.

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11.3.2.2	Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands free cleanable dispenser; and iv. A means of containing used paper towels.	11.3.2.2	Hand wash basins shall be constructed of stainless steel or similar non-corrosive material and as a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands free cleanable dispenser; and iv. A means of containing used paper towels.	No change.
11.3.2.3	The following additional facilities shall be provided in high risk areas: i. Hands free operated taps; and ii. Hand sanitizers.	11.3.2.3	The following additional facilities shall be provided in high risk areas: i. Hands free operated taps; and ii. Hand sanitizers.	No change.
11.3.2.4	A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.	11.3.2.4	A sign instructing people to wash their hands, and in appropriate languages, shall be provided in a prominent position.	No change.
11.3.2.5	Personnel shall have clean hands and hands shall be washed by all personnel, including staff, contractors and visitors: i. On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating or drinking; and v. After handling wash down hoses, dropped product or contaminated material.	11.3.2.5	Personnel shall have clean hands and hands shall be washed by all personnel, including staff, contractors and visitors: i. On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating or drinking; and v. After handling wash down hoses, dropped product or contaminated material.	No change.
11.3.2.6	When gloves are used, personnel shall maintain the hand washing practices outlined above.	11.3.2.6	When gloves are used, personnel shall maintain the hand washing practices outlined above.	No change.

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11.3.3	Clothing	11.3.3	Clothing	
		11.3.3.1	The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food and food contact surfaces from unintentional microbiological or physical contamination.	New element
11.3.3.1	Clothing worn by staff engaged in handling food shall be maintained, stored, laundered and worn so as not to present a contamination risk to products.	11.3.3.2	Clothing worn by staff engaged in handling food shall be maintained, stored, laundered and worn so as not to present a contamination risk to products.	Formerly 11.3.3.1. No change.
11.3.3.2	Staff engaged in high risk areas shall change into clean clothing or don temporary protective outerwear when entering high risk areas.			Moved to 11.7.4.4.
11.3.3.3	Clothing including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition. Excessively soiled uniforms shall be changed where they present a product contamination risk.	11.3.3.3	Clothing including shoes, shall be clean at the commencement of each shift and maintained in a serviceable condition.	Separated into two elements: 11.3.3.3 and 11.3.3.4.
		11.3.3.4	Excessively soiled uniforms shall be changed or replaced where they present a product contamination risk.	Formerly part of 11.3.3.3. Added "or replaced"
11.3.3.4	Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area and not on packaging, ingredients, product or equipment.	11.3.3.5	Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or designated sealed containers in personnel lockers and not on packaging, ingredients, product or equipment.	Formerly 11.3.3.4.  It is acceptable to store aprons and gloves in personnel lockers as long as they are in a designed sealed container.
11.3.4	<b>Jewelry and Personal Effects</b>	11.3.4	<b>Jewelry and Personal Effects</b>	No change.
11.3.4.1	Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or	11.3.4.1	Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or	Clarification that medical alert bracelets must be formally

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	any area where food is exposed. The wearing of plain bands with no stones and medical alert bracelets that cannot be removed can be permitted, however the supplier will need to consider their customer requirements and the applicable food legislation.		any area where food is exposed. The wearing of plain bands with no stones and <b>prescribed</b> medical alert bracelets can be permitted, however the site will need to consider their customer requirements and the applicable food legislation.	prescribed by a medical practitioner (i.e. rather than personnel prescribed).
<b>11.3.5</b>	<b>Visitors</b>	<b>11.3.5</b>	<b>Visitors</b>	No change.
11.3.5.1	All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any food processing or handling area.	11.3.5.1	All visitors, including management and maintenance staff, shall wear suitable clothing and footwear when entering any food processing or handling area.	No change.
11.3.5.2	All visitors shall be required to remove jewelry and other loose objects.	11.3.5.2	All visitors shall be required to remove jewelry and other loose objects.	No change.
11.3.5.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed.	11.3.5.3	Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled or processed.	No change.
11.3.5.4	Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all hand washing and personnel practice requirements.	11.3.5.4	Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all hand washing and personnel practice requirements.	No change.
		<b>11.3.5.5</b>	<b>All visitors shall be trained in the facility's food safety and hygiene procedures before entering into any food processing or handling areas, or shall be escorted at all times in food processing, handling and storage areas.</b>	New element.  Clarification that visitors must be escorted at all times, unless they have had formal training, such as an induction.
<b>11.3.6</b>	<b>Staff Amenities</b>	<b>11.3.6</b>	<b>Staff Amenities</b>	No change.
11.3.6.1	Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and processing of product.	11.3.6.1	Staff amenities supplied with appropriate lighting and ventilation shall be made available for the use of all persons engaged in the handling and processing of product.	No change.
<b>11.3.7</b>	<b>Change Rooms</b>	<b>11.3.7</b>	<b>Change Rooms</b>	No change.

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11.3.7.1	Facilities shall be provided to enable staff and visitors to change into and out of protective clothing as required.	11.3.7.1	Facilities shall be provided to enable staff and visitors to change into and out of protective clothing as required.	No change.
11.3.7.2	Change rooms shall be provided for staff engaged in the processing of high risk foods or processing operations in which clothing can be soiled.	11.3.7.2	Change rooms shall be provided for staff engaged in the processing of high risk foods or processing operations in which clothing can be soiled.	No change.
11.3.7.3	Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food and packaging storage areas.	11.3.7.3	Provision shall be made for staff to store their street clothing and personal items separate from food contact zones and food and packaging storage areas.	No change.
11.3.7.4	Where required, a sufficient number of showers shall be provided for use by staff.	11.3.7.4	Where required, a sufficient number of showers shall be provided for use by staff.	No change.
<b>11.3.8</b>	<b>Laundry</b>	<b>11.3.8</b>	<b>Laundry</b>	No change.
11.3.8.1	Provision shall be made for the laundering and storage of clothing worn by staff engaged in high risk processes and for staff engaged in processing operations in which clothing can be heavily soiled.	11.3.8.1	Provision shall be made for the laundering and storage of clothing worn by staff engaged in high risk processes and for staff engaged in processing operations in which clothing can be heavily soiled.	No change.
<b>11.3.9</b>	<b>Sanitary Facilities</b>	<b>11.3.9</b>	<b>Sanitary Facilities</b>	No change.
11.3.9.1	Toilet rooms shall be: <ul style="list-style-type: none"> <li>i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations;</li> <li>ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room;</li> <li>iii. Sufficient in number for the maximum number of staff;</li> <li>iv. Constructed so that they can be easily cleaned and maintained; and</li> <li>v. Kept clean and tidy.</li> </ul>	11.3.9.1	Toilet rooms shall be: <ul style="list-style-type: none"> <li>i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations;</li> <li>ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room;</li> <li>iii. Sufficient in number for the maximum number of staff;</li> <li>iv. Constructed so that they can be easily cleaned and maintained,</li> <li>v. Include an area inside or nearby, for storing protective clothing, outer garments and other</li> </ul>	Additional requirement that protective clothing must be removed and stored in a suitable area.

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			items while using the facilities; and vi. Kept clean and tidy.	
11.3.9.2	Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system.	11.3.9.2	Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations.	Added "in accordance with regulations".
11.3.9.3	Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.2.	11.3.9.3	Hand wash basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.2.	No change.
<b>11.3.10</b>	<b>Lunch Rooms</b>	<b>11.3.10</b>	<b>Lunch Rooms</b>	No change.
11.3.10.1	Separate lunch room facilities shall be provided away from a food contact/handling zone.	11.3.10.1	Separate lunch room facilities shall be provided away from a food contact/handling zone.	No change.
11.3.10.2	Lunch room facilities shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities enabling them to store or heat food and to prepare non-alcoholic beverages if required, and v. Kept clean and free from waste materials and pests.	11.3.10.2	Lunch room facilities shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities enabling them to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.	No change.
		11.3.10.3	Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential	New element.  Outside eating areas must not pose a risk.



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			for introduction of contamination into site and pest attraction.	
11.3.10.3	Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in lunch rooms and at lunch room exits.	11.3.10.4	Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in lunch rooms and at lunch room exits, and in outside eating areas, if applicable.	Added "and in outside eating areas if applicable"
<b>11.3.11</b>	<b>First Aid</b>			Section removed.
11.3.11.1	First aid facilities shall be provided to treat minor injuries and suitable arrangements shall be provided in circumstances when a patient requires more specialized care.			Removed
<b>11.4</b>	<b>Personnel Processing Practices</b>	<b>11.4</b>	<b>Personnel Processing Practices</b>	No change.
<b>11.4.1</b>	<b>Staff Engaged in Food Handling and Processing Operations</b>	<b>11.4.1</b>	<b>Staff Engaged in Food Handling and Processing Operations</b>	No change.
11.4.1.1	All personnel engaged in any food handling, preparation or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: <ul style="list-style-type: none"> <li>i. Personnel entry to processing areas shall be through the personnel access doors only;</li> <li>ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access for waste removal or receiving of product/ingredient/packaging is required;</li> <li>iii. The wearing of false fingernails or fingernail polish is not permitted when handling food;</li> <li>iv. Packaging material, product, and ingredients shall be kept in appropriate</li> </ul>	11.4.1.1	All personnel engaged in any food handling, preparation or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: <ul style="list-style-type: none"> <li>i. Personnel entry to processing areas shall be through the personnel access doors only;</li> <li>ii. All doors are to be kept closed. Doors shall not be left open for extended periods when access for waste removal or receiving of product/ingredient/packaging is required;</li> <li>iii. Packaging material, product, and ingredients shall be kept in appropriate containers as required and off the floor;</li> <li>iv. Waste shall be contained in the bins</li> </ul>	False eyelashes, eyelash extensions and long nails are no longer permitted.  Hair restraints (bobbles etc.) must be worn where the product is exposed.

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	containers as required and off the floor; v. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; vi. Staff shall not eat or taste any product being processed in the food handling/contact zone, except as noted in section 11.4.1.2		identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; v. Staff shall not eat or taste any product being processed in the food handling/contact zone, except as noted in element 11.4.1.2; vi. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails or fingernail polish is not permitted when handling exposed food; vii. Hair restraints are used where product is exposed.	
11.4.1.2	In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone the supplier shall implement proper controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained and stored separate from processing equipment.	11.4.1.2	In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone the site shall implement proper controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained and stored separate from processing equipment.	No change.
11.4.1.3	All wash down hoses shall be stored on hose racks after use and not left on the floor.	11.4.1.3	All wash down hoses shall be stored on hose racks after use and not left on the floor.	No change.
<b>11.5</b>	<b>Water, Ice, and Air Supply</b>	<b>11.5</b>	<b>Water, Ice, and Air Supply</b>	No change.

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<b>11.5.1</b>	<b>Water Supply</b>	<b>11.5.1</b>	<b>Water Supply</b>	No change.
11.5.1.1	Adequate supplies of potable water drawn from a known clean source shall be provided for use during processing operations, as an ingredient and for cleaning the premises and equipment.	11.5.1.1	Adequate supplies of potable water drawn from a known clean source shall be provided for use during processing operations, as an ingredient and for cleaning the premises and equipment.	No change.
11.5.1.2	Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.	11.5.1.2	Supplies of hot and cold water shall be provided as required to enable the effective cleaning of the premises and equipment.	No change.
		11.5.1.3	The delivery of water within the premises shall ensure potable water is not contaminated.	Formerly 11.5.3.1. No change.
		11.5.1.4	The use of non-potable water shall be controlled such that: i. There is no cross contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified. iii. Hoses, taps, or other similar sources of possible contamination are designed to prevent back flow or back siphonage.	Formerly 11.5.3.2. Added requirement to prevent back flow.
		11.5.1.5	Where water is stored on site, storage facilities shall be adequately designed, constructed and maintained to prevent contamination.	New element. Fit for purpose water storage equipment is now required.
<b>11.5.2</b>	<b>Monitoring Water Microbiology and Quality</b>			Section moved to 11.5.4.
11.5.2.1	Water used for: i. washing, thawing and treating food; ii. an ingredient or food processing aid; iii. cleaning food contact surfaces; iv. the manufacture of ice; and			Moved to 11.5.4.1

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	v. the manufacture of steam that will come in contact with food or used to heat water that will come in contact with food shall comply with local, national or internationally recognized potable water microbiological and quality standards as required.			
<b>11.5.3</b>	<b>Water Delivery</b>			Section moved to 11.5.1.
11.5.3.1	The delivery of water within the premises shall ensure potable water is not contaminated.			Moved to 11.5.1.3.
11.5.3.2	The use of non-potable water shall be controlled such that: i. There is no cross contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified.			Moved to 11.5.1.4.
<b>11.5.4</b>	<b>Water Treatment</b>	<b>11.5.2</b>	<b>Water Treatment</b>	Formerly 11.5.4.
11.5.4.1	Water treatment methods, equipment and materials shall be designed, installed and operated to ensure water receives an effective treatment.	11.5.2.1	Water treatment methods, equipment and materials, if required, shall be designed, installed and operated to ensure water receives an effective treatment	Formerly 11.5.4.1. No change.
11.5.4.2	Water treatment equipment shall be monitored regularly to ensure it remains serviceable.	11.5.2.2	Water treatment equipment shall be monitored regularly to ensure it remains serviceable.	Formerly 11.5.4.2. No change.
11.5.4.3	Treated water shall be regularly monitored to ensure it meets the indicators specified.	11.5.2.3	Treated water shall be regularly monitored to ensure it meets the indicators specified.	Formerly 11.5.4.2. No change.
		11.5.2.4	Water used in as an ingredient in processing, or in cleaning and sanitizing equipment, shall be tested, and	New element.

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			if required, treated to maintain potability (refer to element 11.5.2.1).	Water testing now required.
<b>11.5.5</b>	<b>Ice Supply</b>	<b>11.5.3</b>	<b>Ice Supply</b>	Formerly 11.5.5.
11.5.5.1	Ice provided for use during processing operations or as a processing aid or an ingredient shall comply with 11.5.2.1.	11.5.3.1	Ice provided for use during processing operations or as a processing aid or an ingredient shall comply with 11.5.4.1.	Formerly 11.5.5.1.  Reference updated.
11.5.5.2	Ice rooms and receptacles shall be constructed of materials as outlined in elements 11.2.1, 11.2.2 and 11.2.3 and designed to minimize contamination of the ice during storage and distribution.	11.5.3.2	Ice rooms and receptacles shall be constructed of materials as outlined in elements 11.2.1, 11.2.2 and 11.2.3 and designed to minimize contamination of the ice during storage and distribution.	Formerly 11.5.5.2.  No change.
<b>11.5.6</b>	<b>Analysis</b>	<b>11.5.4</b>	<b>Monitoring Water Microbiology and Quality</b>	Formerly 11.5.2.
		11.5.4.1	Water shall comply with local, national or internationally recognized potable water microbiological and quality standards as required when used for: <ul style="list-style-type: none"> <li>i. washing, thawing and treating food;</li> <li>ii. handwashing;</li> <li>iii. to convey food;</li> <li>iv. as an ingredient or food processing aid;</li> <li>v. cleaning food contact surfaces and equipment;</li> <li>vi. the manufacture of ice; or</li> <li>vii. the manufacture of steam that will come into contact with food or used to heat water that will come in contact with food.</li> </ul>	Formerly 11.5.2.1.  Restructured the wording.  Added more detail, to ensure that all water used for food contact purposes is covered.
11.5.6.1	Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities and the effectiveness of the treatment measures implemented.	11.5.4.2	Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for	Formerly 11.5.6.1  Water testing must be at least annually. A risk assessment is required that determines if

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			the process or cleaning from within the facility. The frequency of analysis shall be risk-based, and at a minimum annually.	more frequent testing is required. Samples must be taken from sources throughout the facility.
11.5.6.2	Water and ice shall be analyzed using reference standards and methods.	11.5.4.3	Water and ice shall be analyzed using reference standards and methods.	Formerly 11.5.6.2.  No change.
<b>11.5.7</b>	<b>Air Quality</b>	<b>11.5.5</b>	<b>The Quality of Air and Other Gasses</b>	Formerly 11.5.7.  Header updated.
11.5.7.1	Compressed air that contacts food or food contact surfaces shall be clean and present no risk to food safety;	11.5.5.1	Compressed air or other gases (e.g., nitrogen, carbon dioxide) that contacts food or food contact surfaces shall be clean and present no risk to food safety.	Formerly 11.5.7.1.  Expanded to include other food contact gases.
11.5.7.2	Compressed air systems used in the manufacturing process shall be maintained and regularly monitored for purity.	11.5.5.2	Compressed air systems, and systems used to store or dispense other gases used in the manufacturing process that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards.	Formerly 11.5.7.2.  Expanded to include other food contact gases.  Amended purity to quality and applicable food safety hazards, so that it's clear that the gas must not just be pure, but safe.
<b>11.6</b>	<b>Storage and Transport</b>	<b>11.6</b>	<b>Storage and Transport</b>	No change.
		<b>11.6.1</b>	<b>Storage and Handling of Goods</b>	Section added.
		11.6.1.1.	The site shall document and implement an effective storage plan that allows for the safe, hygienic storage of raw materials (frozen, chilled, and ambient), ingredients, packaging materials, equipment, and chemicals.	New element.  A documented storage plan is now required.

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(2.4.9.1)	The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.	11.6.1.2	The responsibility and methods for ensuring effective stock rotation principles are applied shall be documented and implemented.	Formerly 2.4.9.1. No change.
(2.4.9.2)	Procedures are in place to ensure that all ingredients, materials, work-in-progress, and finished product are utilized within their designated shelf-life.	11.6.1.3	Procedures are in place to ensure that all ingredients, materials, work-in-progress, <b>rework</b> , and finished product are utilized within their designated shelf-life.	Formerly 2.4.9.2. Added rework.
(11.6.3.1)	Storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.	11.6.1.4	<b>Equipment</b> storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.	Formerly 11.6.3.1 Added word equipment.
(11.6.5.1)	Where goods described in 11.6.1 to 11.6.4 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food safety and quality.	11.6.1.5	Where goods described in 11.6.2 to 11.6.4 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the integrity of those goods or contamination or adverse effect on food safety.	Formerly 11.6.5.1
		11.6.1.6	<b>Records shall be available to validate alternate or temporary control measures for the storage of raw materials, ingredients, packaging materials, equipment, chemicals, or finished products.</b>	New clause.
<b>11.6.1</b>	<b>Cold Storage, Freezing and Chilling of Foods</b>	<b>11.6.2</b>	<b>Cold Storage, Freezing and Chilling of Foods</b>	Formerly 11.6.1. No change.
11.6.1.1	The supplier shall provide confirmation of the effective operational performance of freezing, chilling and cold storage facilities. Chillers, blast freezers and cold storage rooms shall be: i. Designed and constructed to allow for the hygienic and efficient refrigeration of food; and ii. Easily accessible for inspection and cleaning.	11.6.2.1	The site shall provide confirmation of the effective operational performance of freezing, chilling and cold storage facilities. Chillers, blast freezers and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and easily accessible for inspection and cleaning.	Formerly 11.6.1.1.  Updated format, but no change to content.

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11.6.1.2	Sufficient refrigeration capacity shall be available to chill, freeze, store chilled or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.	11.6.2.2	Sufficient refrigeration capacity shall be available to chill, freeze, store chilled or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.	Formerly 11.6.1.2. No change.
11.6.1.3	Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.	11.6.2.3	Discharge from defrost and condensate lines shall be controlled and discharged to the drainage system.	Formerly 11.6.1.3. No change.
11.6.1.4	Freezing, chilling and cold storage rooms shall be fitted with temperature monitoring equipment and located so as to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible.	11.6.2.4	Freezing, chilling and cold storage rooms shall be fitted with temperature monitoring equipment and located so as to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible.	Formerly 11.6.1.4. No change.
11.6.1.5	Loading and unloading docks shall be designed to protect the product during loading and unloading.	11.6.2.5	Loading and unloading docks shall be designed to protect the product during loading and unloading.	Formerly 11.6.1.5. No change.
<b>11.6.2</b>	<b>Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods</b>	<b>11.6.3</b>	<b>Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods</b>	Formerly 11.6.2. No change.
11.6.2.1	Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration.	11.6.3.1	Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration.	Formerly 11.6.2.1. No change.
11.6.2.2	Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be constructed to prevent packaging from becoming a harborage for pests or vermin.	11.6.3.2	Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning of the floors and the storage room. Storage areas shall be constructed to prevent packaging from becoming a harborage for pests or vermin.	Formerly 11.6.2.2. No change.



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11.6.2.3	Vehicles used in food contact, handling or processing zones or in cold storage rooms shall be designed and operated so as not to present a food safety hazard.	11.6.3.3.	Vehicles used in food contact, handling or processing zones or in cold storage rooms shall be designed and operated so as not to present a food safety hazard.	Formerly 11.6.2.3. No change.
<b>11.6.3</b>	<b>Storage of Equipment and Containers</b>			
11.6.3.1	Storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers.			
<b>11.6.4</b>	<b>Storage of Hazardous Chemicals and Toxic Substances</b>	<b>11.6.4</b>	<b>Storage of Hazardous Chemicals and Toxic Substances</b>	No change
11.6.4.1	Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to staff, product, packaging, product handling equipment or areas in which the product is handled, stored or transported.	11.6.4.1	Hazardous chemicals and toxic substances with the potential for food contamination shall be stored so as not to present a hazard to staff, product, packaging, product handling equipment or areas in which the product is handled, stored or transported.	No change.
11.6.4.2	Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.	11.6.4.2	Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.	No change.
11.6.4.3	Daily supplies of chemical used for continuous sanitizing of water or as a processing aid, or for emergency cleaning of food processing equipment or surfaces in food contact zones, may be stored within or in close proximity to a processing area provided access to the chemical storage facility is restricted to authorized personnel.	11.6.4.3	Daily supplies of chemicals used for continuous sanitizing of water or as a processing aid, or for emergency cleaning of food processing equipment or surfaces in food contact zones, may be stored within or in close proximity to a processing area provided access to the chemical storage facility is restricted to authorized personnel.	No change.
11.6.4.4	Pesticides, rodenticides, fumigants and insecticides shall be stored separate from sanitizers and detergents. All chemicals shall be stored in their original containers.	11.6.4.4	Pesticides, rodenticides, fumigants and insecticides shall be stored separate from sanitizers and detergents. All chemicals shall be stored in their original containers, or in clearly labeled and suitable secondary containers if allowed by applicable legislation.	Clarification that it is acceptable to decant chemicals if the local legislation allows and as long as they are labelled and in a suitable container.

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11.6.4.5	<p>Hazardous chemical and toxic substance storage facilities shall:</p> <ul style="list-style-type: none"> <li>i. Be compliant with national and local legislation and designed such that there is no cross-contamination between chemicals;</li> <li>ii. Be adequately ventilated;</li> <li>iii. Be provided with appropriate signage indicating the area is a hazardous storage area;</li> <li>iv. Be secure and lockable to restrict access only to those personnel with formal training in the handling and use of hazardous chemicals and toxic substances;</li> <li>v. Have instructions on the safe handling of hazardous chemicals and toxic substances readily accessible to staff;</li> <li>vi. Be equipped with a detailed and up-to-date inventory of all chemicals contained in the storage facility;</li> <li>vii. Have suitable first aid equipment and protective clothing available in close proximity to the storage area;</li> <li>viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and</li> <li>ix. Be equipped with spillage kits and cleaning equipment.</li> </ul>	11.6.4.5.	<p>Hazardous chemical and toxic substance storage facilities shall:</p> <ul style="list-style-type: none"> <li>i. Be compliant with national and local legislation and designed such that there is no cross-contamination between chemicals;</li> <li>ii. Be adequately ventilated;</li> <li>iii. Be provided with appropriate signage indicating the area is a hazardous storage area;</li> <li>iv. Be secure and lockable to restrict access only to those personnel with formal training in the handling and use of hazardous chemicals and toxic substances;</li> <li>v. Have instructions on the safe handling of hazardous chemicals and toxic substances readily accessible to staff;</li> <li>vi. Be equipped with a detailed and up-to-date inventory of all chemicals contained in the storage facility;</li> <li>vii. Have suitable first aid equipment and protective clothing available in close proximity to the storage area;</li> <li>viii. In the event of a hazardous spill, be designed such that spillage and drainage from the area is contained; and</li> <li>ix. Be equipped with spillage kits and cleaning equipment.</li> </ul>	No change.
<b>11.6.5</b>	<b>Alternative Storage and Handling of Goods</b>			
11.6.5.1	Where goods described in 11.6.1 to 11.6.4 are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there is no risk to the			

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	integrity of those goods or contamination or adverse effect on food safety and quality.			
<b>11.6.6</b>	<b>Loading, Transport, and Unloading Practices</b>	<b>11.6.5</b>	<b>Loading, Transport, and Unloading Practices</b>	
11.6.6.1	The practices applied during loading, transport and unloading of food shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported and unloaded under conditions suitable to prevent cross contamination.	11.6.5.1	The practices applied during loading, transport and unloading of food shall be documented, implemented and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported and unloaded under conditions suitable to prevent cross contamination.	Formerly 11.6.6.1.  No change.
<b>11.6.7</b>	<b>Loading</b>	<b>11.6.6</b>	<b>Loading</b>	Formerly 11.6.7.  No change.
11.6.7.1	Vehicles (trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose and free from odors or other conditions that may impact negatively on the product.	11.6.6.1	Vehicles (e.g. trucks/vans/containers) used for transporting food shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose and free from odors or other conditions that may impact negatively on the product.	Formerly 11.6.7.1.  Addition of e.g. to clarify that these are just examples of vehicles and not specifically the only ones that this applies to.
11.6.7.2	Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity.	11.6.6.2	Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity during loading and transport.	Formerly 11.6.7.2.  Added "during loading and transport"
		11.6.6.3	Vehicles (e.g. trucks/vans/containers) shall be secured from tampering using a seal or other agreed upon, acceptable device or system.	New element.  Seals are now required.
<b>11.6.8</b>	<b>Transport</b>	<b>11.6.7</b>	<b>Transport</b>	Formerly 11.6.8.  No change.
11.6.8.1	Refrigerated units shall maintain the food at required temperatures and the unit's temperature settings shall be set, checked and recorded before loading and core	11.6.7.1	Refrigerated units shall maintain the food at required temperatures and the unit's temperature settings shall be set, checked and recorded before loading and	Formerly 11.6.8.1.  No change.

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	product temperatures recorded at regular intervals during loading as appropriate.		product temperatures recorded at regular intervals during loading as appropriate.	
11.6.8.2	The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals and the storage temperature checked at regular intervals during transit.	11.6.7.2	The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals and the storage temperature checked at regular intervals during transit.	Formerly 11.6.8.2. No change.
11.6.9	<b>Unloading</b>	11.6.8	<b>Unloading</b>	Formerly 11.6.9. No change.
11.6.9.1	Prior to opening the doors, the refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.	11.6.8.1	Prior to opening the doors, the refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently and product temperatures shall be recorded at the commencement of unloading and at regular intervals during unloading.	Formerly 11.6.9.1. No change.
11.6.9.2	Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity.	11.6.8.2	Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining the product and package integrity.	Formerly 11.6.9.2. No change.
11.7	<b>Separation of Functions</b>	11.7	<b>Separation of Functions</b>	No change.
11.7.1	<b>Process Flow</b>	11.7.1	<b>Process Flow</b>	No change.
11.7.1.1	The process flow shall be designed to prevent cross contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.	11.7.1.1	The process flow shall be designed to prevent cross contamination and organized so there is a continuous flow of product through the process. The flow of personnel shall be managed such that the potential for contamination is minimized.	No change.
11.7.2	<b>Receipt of Raw and Packaging Materials and Ingredients</b>	11.7.2	<b>Receipt of Raw and Packaging Materials and Ingredients</b>	No change.

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11.7.2.1	Dry ingredients and packaging shall be received and stored separately from frozen and chilled raw materials to ensure there is no cross contamination. Unprocessed raw materials shall be received and segregated to ensure there is no cross contamination.	11.7.2.1	Dry ingredients and packaging shall be received and stored separately from frozen and chilled raw materials to ensure there is no cross contamination. Unprocessed raw materials shall be received and segregated to ensure there is no cross contamination.	No change.
<b>11.7.3</b>	<b>Thawing of Food</b>	<b>11.7.3</b>	<b>Thawing of Food</b>	No change.
11.7.3.1	Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose.	11.7.3.1	Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose.	No change.
11.7.3.2	Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature does not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor.	11.7.3.2	Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature does not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor.	No change.
11.7.3.3	Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.	11.7.3.3	Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.	No change.
11.7.3.4	Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product	11.7.3.4	Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.	No change.
<b>11.7.4</b>	<b>High Risk Processes</b>	<b>11.7.4</b>	<b>High Risk Processes</b>	No change.
11.7.4.1	The processing of high risk food shall be conducted under controlled conditions such that: i. Sensitive areas in which high risk food has undergone a “kill” step, a “food safety intervention” or is subject to post process handling, are protected/segregated from other processes, raw materials or staff who handle raw materials to ensure cross contamination is minimized;	11.7.4.1	The processing of high risk food shall be conducted under controlled conditions such that sensitive areas in which high risk food has undergone a “kill” step, a “food safety intervention” or is subject to post process handling, are protected/segregated from other processes, raw materials or staff who handle raw materials to ensure cross contamination is minimized.	Element broken down into separate elements below.  Environmental monitoring moved to System Elements (2.4.4).

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	<p>ii. Areas in which high risk processes are conducted <b>are</b> only serviced by staff dedicated to that function;</p> <p>iii. Staff access points are located, designed and equipped to enable staff to don distinctive protective clothing and to practice a high standard of personal hygiene to prevent product contamination;</p> <p>iv. Product transfer points are located and designed so as not to compromise high risk segregation and to minimize the risk of cross contamination; and</p> <p>v. An environmental monitoring program shall be in place for high risk areas. At a minimum, a written procedure detailing the applicable pathogens or indicator organisms to test for that industry, the number of samples to be taken and the frequency of sampling and corrective actions shall be documented.</p> <p>The responsibility and methods shall be documented and implemented. A sampling schedule shall be prepared.</p>			
		11.7.4.2	Areas in which high risk processes are conducted <b>shall</b> only <b>be</b> serviced by staff dedicated to that function.	Formerly 11.7.4.2 ii.  Word structuring updated, but otherwise no change.
		11.7.4.3	Staff access points <b>shall be</b> located, designed and equipped to enable staff to don distinctive protective clothing and to practice a high standard of personal hygiene to prevent product contamination.	Formerly 11.7.4.2 iii.  Word structuring updated, but otherwise no change.

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		11.7.4.4	Staff engaged in high risk areas shall change into clean clothing or don temporary protective outerwear when entering high risk areas.	Formerly 11.3.3.2. No change.
		11.7.4.5	Product transfer points shall be located and designed so as not to compromise high risk segregation and to minimize the risk of cross contamination.	Formerly 11.7.4.1 iv. Word structuring updated, but otherwise no change.
<b>11.7.5</b>	<b>Control of Foreign Matter Contamination</b>	<b>11.7.5</b>	<b>Control of Foreign Matter Contamination</b>	No change.
11.7.5.1	The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented and communicated to all staff.	11.7.5.1	The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented and communicated to all staff.	No change.
11.7.5.2	Inspections shall be performed to ensure plant and equipment remains in good condition and potential contaminants have not detached or become damaged or deteriorated.	11.7.5.2	Inspections shall be performed to ensure plant and equipment remains in good condition, equipment has not become detached or deteriorated and are free from potential contaminants.	Clarification that equipment should not become a contamination risk, even if the contamination has not yet become detached.
11.7.5.3	The use of temporary fasteners such as string, wire or tape to fix or hold equipment shall not be permitted			Element removed - addressed in 11.2.9.7.
11.7.5.4	The following preventative measures shall be implemented where applicable to prevent glass contamination: i. All glass objects or similar material in food handling/contact zones shall be listed in a glass register including details of their location; ii. Containers, equipment and other utensils made of glass, porcelain, ceramics, laboratory glassware or other like material (except where the product is contained in packaging made from these materials, or measurement	11.7.5.3	All glass objects or similar material in food handling/contact zones shall be listed in a glass register including details of their location.	Formerly 11.7.5.4 i. Element broken down into separate elements below.

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	instruments with glass dial covers or MIG thermometers required under regulation) shall not be permitted in food processing /contact zones; iii. <b>Conduct</b> regular inspections of food handling/contact zones to ensure they are free of glass or other like material and to establish no changes to the condition of the objects listed in the glass register; and iv. <b>Inspect</b> glass instrument dial covers on processing equipment and MIG thermometers at the start and finish of each shift to confirm they have not been damaged.			
		<b>11.7.5.4</b>	Containers, equipment and other utensils made of glass, porcelain, ceramics, laboratory glassware or other like material (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers or MIG thermometers required under regulation) shall not be permitted in food processing /contact zones.	Formerly 11.7.5.4 ii.  No change.
		<b>11.7.5.5</b>	Regular inspections of food handling/contact zones <b>shall be conducted</b> to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass register.	Formerly 11.7.5.4 iii.  Sentence structure updated, but otherwise no change.
		<b>11.7.5.6</b>	Glass instrument dial covers on processing equipment and MIG thermometers <b>shall be inspected</b> at the start and finish of each shift to confirm they have not been damaged.	Formerly 11.7.5.4 iv.  Sentence structure update, but otherwise no change.
11.7.5.5	Wooden pallets and other wooden utensils used in food handling/contact zones shall be dedicated for	<b>11.7.5.7</b>	Wooden pallets and other wooden utensils used in food handling/contact zones shall be dedicated for	Formerly 11.7.5.5.  No change.



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	that purpose, clean, maintained in good order. Their condition is subject to regular inspection.		that purpose, clean, maintained in good order. Their condition is subject to regular inspection.	
11.7.5.6	Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.	11.7.5.8	Loose metal objects on equipment, equipment covers and overhead structures shall be removed or tightly fixed so as not to present a hazard.	Formerly 11.7.5.6. No change.
11.7.5.7	Knives and cutting instruments used in processing and packaging operations shall be controlled, and kept clean and well maintained.	11.7.5.9	Knives and cutting instruments used in processing and packaging operations shall be controlled, and kept clean and well maintained.	Formerly 11.7.5.7. No change.
<b>11.7.6</b>	<b>Detection of Foreign Objects</b>	<b>11.7.6</b>	<b>Detection of Foreign Objects</b>	No change.
11.7.6.1	The responsibility, methods and frequency for monitoring, maintaining, calibrating and using screens, sieves, filters or other technologies to remove or detect foreign matter shall be documented and implemented.	11.7.6.1	The responsibility, methods and frequency for monitoring, maintaining, calibrating and using screens, sieves, filters or other technologies to remove or detect foreign matter shall be documented and implemented.	No change.
11.7.6.2	Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.	11.7.6.2	Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.	No change.
11.7.6.3	Records shall be maintained of the inspection by foreign object detection devices, and their verification.	11.7.6.3	Records shall be maintained of the inspection of foreign object detection devices and of any products rejected or removed by them. Records shall include any corrective actions resulting from the inspections.	Requirement added to record rejections and their investigation.
<b>11.7.7</b>	<b>Managing Foreign Matter Contamination Incidents</b>	<b>11.7.7</b>	<b>Managing Foreign Matter Contamination Incidents</b>	No change.
11.7.7.1	In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked or disposed of.	11.7.7.1	In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked or disposed of.	No change.
11.7.7.2	In circumstances where glass or similar material breakage occurs, the affected area is to be isolated,	11.7.7.2	In circumstances where glass or similar material breakage occurs, the affected area is to be isolated,	No change.

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	cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person prior to the commencement of operations.		cleaned and thoroughly inspected (including cleaning equipment and footwear) and cleared by a suitably responsible person prior to the commencement of operations.	
<b>11.8</b>	<b>On-Site Laboratories</b>	<b>11.8</b>	<b>On-Site Laboratories</b>	No change.
<b>11.8.1</b>	<b>Location</b>	<b>11.8.1</b>	<b>Location</b>	No change.
11.8.1.1	On site laboratories shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel.	11.8.1.1	On site laboratories <b>conducting chemical and microbiological analysis that may pose a risk to product safety</b> , shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel.	Clarified that this only applies to labs doing chemical and micro testing which may cause a food safety risk.
11.8.1.2	Provisions shall be made to isolate and contain all laboratory waste held on the premises and manage it separately from food waste. Laboratory waste water outlet shall as a minimum be down stream of drains that service food processing and handling areas.	11.8.1.2	Provisions shall be made to isolate and contain all laboratory waste held on the premises and manage it separately from food waste. Laboratory waste water outlet shall as a minimum be down stream of drains that service food processing and handling areas.	No change.
11.8.1.3	Signage shall be displayed identifying the laboratory area as a restricted area accessible only by authorized personnel.	11.8.1.3	Signage shall be displayed identifying the laboratory area as a restricted area accessible only by authorized personnel.	No change.
<b>11.9</b>	<b>Waste Disposal</b>	<b>11.9</b>	<b>Waste Disposal</b>	No change.
<b>11.9.1</b>	<b>Dry and Liquid Waste Disposal</b>	<b>11.9.1</b>	<b>Dry and Liquid Waste Disposal</b>	No change.
11.9.1.1	The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.	11.9.1.1	The responsibility and methods used to collect and handle dry, wet and liquid waste and store prior to removal from the premises shall be documented and implemented.	No change.
11.9.1.2	Waste shall be removed on a regular basis and not build up in food handling or processing areas. Designated waste accumulation areas shall be	11.9.1.2	Waste shall be removed on a regular basis and not build up in food handling or processing areas. Designated waste accumulation areas shall be	No change.

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	maintained in a clean and tidy condition until such time as external waste collection is undertaken.		maintained in a clean and tidy condition until such time as external waste collection is undertaken.	
11.9.1.3	Trolleys, vehicles waste disposal equipment, collection bins and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.	11.9.1.3	Trolleys, vehicles waste disposal equipment, collection bins and storage areas shall be maintained in a serviceable condition and cleaned and sanitized regularly so as not to attract pests and other vermin.	No change.
11.9.1.4	Adequate provision shall be made for the disposal of all solid processing waste including trimmings, inedible material and used packaging. Waste held on site prior to disposal shall be stored in a separate storage facility and suitably fly proofed and contained so as not to present a hazard.	11.9.1.4	Adequate provision shall be made for the disposal of all solid processing waste including trimmings, inedible material and used packaging.	Separated into two elements.
		11.9.1.5	Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance.	New element.  New requirement for Trademarked goods.
		11.9.1.6	Inedible waste designated for animal feed shall be stored and handled so as to not cause a risk to the animal or to further processing.	New element.  New requirement for animal feed.
		11.9.1.7	Waste held on site prior to disposal shall be stored in a separate storage area and suitably pest proofed and contained so as not to present a hazard.	Formerly 11.9.1.4.  Clarification that the storage does not need to be in a separate facility, but just a separate area on site.  Clarification that proofing must be for all pests, not just flies.

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11.9.1.5	Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall be either removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal so as not to present a hazard.	11.9.1.8	Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall be either removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal so as not to present a hazard.	Formerly 11.9.1.5. No change.
11.9.1.6	Reviews of the effectiveness of waste management will form part of daily hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports.	11.9.1.9	Reviews of the effectiveness of waste management will form part of daily hygiene inspections and the results of these inspections shall be included in the relevant hygiene reports.	Formerly 11.9.1.6. No change.
<b>11.10</b>	<b>Exterior</b>	<b>11.10</b>	<b>Exterior</b>	No change.
<b>11.10.1</b>	<b>Grounds and Roadways</b>	<b>11.10.1</b>	<b>Grounds and Roadways</b>	No change.
11.10.1.1		11.10.1.1	Measures shall be established to maintain a suitable external environment, and the effectiveness of the established measures shall be monitored and periodically reviewed.	Formerly 11.1.1.2. No change.
11.10.1.1	The grounds and area surrounding the premises shall be maintained to minimize dust and be kept free of waste or accumulated debris so as not to attract pests and vermin.	11.10.1.2	The grounds and area surrounding the premises shall be maintained to minimize dust and be kept free of waste, accumulated debris or standing water so as not to attract pests and vermin.	Formerly 11.10.1.1. No change.
11.10.1.2	Paths, roadways and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.	11.10.1.3	Paths, roadways and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operation of the premises.	Formerly 11.10.1.2. No change.
		11.10.1.4	Paths, roadways, loading and unloading areas shall be adequately drained to prevent ponding of water. Drains shall be separate from the facility drainage system and regularly cleared of debris.	New element. Requirement around drains to prevent ponding of water.
11.10.1.3	Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises.	11.10.1.5	Surroundings shall be kept neat and tidy and not present a hazard to the hygienic and sanitary operation of the premises.	Formerly 11.10.1.3. No change.

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11.10.1.4	Paths from amenities leading to facility entrances are required to be effectively sealed	11.10.1.6	Paths from amenities leading to facility entrances are required to be effectively sealed	Formerly 11.10.1.4.  No change.
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