Academy Course
GFSI NC’s and How to Avoid Them

BRC Global Standard for Food Safety

John Kukoly
BRC Update

Over 22,000 certificated sites worldwide

• 18,000 in the Food Standard
• Certificates issued in 118 different countries

2014 Launches

• January: Auditor Category exams
• February: Agents and Brokers Standard
• October: BRC Participate Launch
• 2014 – 1000+ sites go unannounced audit plan
• January 2015 – Food 7 released
BRC Global Standards
Scope/Exclusions from scope

Objective

- Ensure clarity for customers of the site
- Protection of the BRC Brand

Change

- Exclusions limited to the following conditions
- the excluded products can be clearly differentiated from products within scope
  AND
- the products are produced in a physically segregated area of the factory.
- Logo use not permitted where exclusions present
Grading

Objective

- Encourage differentiation and improvement
- Relieve pressure on reporting issues

Change

- New AA top grade for 5 minor NCs
- A grade remains unchanged =/< 10 minors
- B and C grades redistributed over B, C and a new Grade D
Changes to the Audit Requirements
Supplier Approval

Objective

• Update requirements to cover packaging
• Ensure sufficiently rigorous processes are in operation

Change

• Fundamental requirement
• All 3 clauses revised
• New requirement for traceability
### 3.5.1 Management of suppliers of raw materials and packaging

#### 3.5.1.1
The company shall undertake a documented risk assessment of each raw material or group of raw materials including packaging to identify potential risks to product safety, legality and quality. This shall take into account the potential for:

- Allergen contamination
- Foreign-body risks
- Microbiological contamination
- Chemical contamination
- Substitution or fraud (see clause 5.4.2)

Consideration shall also be given to the significance of a raw material to the quality of the final product.

The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring. The risk assessments shall be reviewed at least annually.
3.5.1 Management of suppliers of raw materials and packaging

3.5.1.2 The company shall have a documented supplier approval and ongoing monitoring procedure to ensure that all suppliers of raw materials, including packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval and monitoring procedure shall be based on risk and include one or a combination of:

- Certification (e.g. to BRC Global Standards or other GFSI-recognised scheme)
- Supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor.

or, for suppliers assessed as low risk only, supplier questionnaires.

Where approval is based on questionnaires, these shall be reissued at least every 3 years and suppliers be required to notify the site of any significant changes in the interim.

The site shall have an up-to-date list of approved suppliers.
<table>
<thead>
<tr>
<th>3.5.1</th>
<th>Management of suppliers of raw materials and packaging</th>
</tr>
</thead>
</table>
| 3.5.1.4 | The procedures shall define how exceptions to the supplier approval processes in clause 3.5.1.2 are handled (e.g. where raw material suppliers are prescribed by a customer) or where information for effective supplier approval is not available (e.g. bulk agricultural commodity products) and instead product testing is used to verify product quality and safety.  
When a site produces customer-branded product the relevant exceptions shall be identified to the customer. |
Traceability

Objective

• Meet concerns regarding supply chain traceability
• Visibility where agents and brokers are used

Change

• 2 new clauses:
  • Greater assurance of supplier traceability
  • Agents and brokers accountability
### 3.9 Traceability

| 3.9.3 | The company shall verify that its suppliers of raw materials have an effective traceability system. Where a supplier has been approved based on a questionnaire, instead of certification or audit, verification of the supplier’s traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test. Where a raw material is received directly from a farm or fish farm, further verification of the farms traceability system is not mandatory. |

### 3.5.1 Management of suppliers of raw materials and packaging

| 3.5.1.3 | Where raw materials are purchased from agents or brokers, the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material. Information to enable the approval of the manufacturer, packer or consolidator, as in clause 3.5.1.2, shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is themselves certificated to the BRC Global Standard for Agents and Brokers. |
Labelling and Pack Control

Objective

• Address the most common issue resulting in product recalls and withdrawals.

Change

• New Fundamental section: Labelling and Pack control
• New section: Product Labelling
• Detailed requirements to manage product change over
• Sample label verification within vertical traceability audit
### 5.2 Product Labelling

#### 5.2.1
All products shall be labelled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer. There shall be a process to verify that ingredient and allergen labelling is correct based on the product recipe and ingredient specifications.

#### 5.2.2
There shall be effective processes in place to ensure that labelling information is reviewed whenever changes occur to:

- the product recipe
- raw materials
- the supplier of raw materials
- the country of origin of raw materials
- legislation

#### 5.2.3
Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. a nutrition claim, reduced sugar), the company shall ensure that the product formulation and production process is fully validated to meet the stated claim.

#### 5.2.4
Where the label information is the responsibility of a customer or a nominated third party the company shall provide:

- information to enable the label to be accurately created
- information whenever a change occurs which may affect the label information
### 6.2 Labelling and Pack control

#### 6.2.1

There shall be a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available at the packaging machines. Where off line coding or printing of packaging materials occur, checks shall be in place that only correctly printed material is available at the packaging machines.

#### 6.2.2

Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleaned and are ready for production. Documented checks shall be carried out at product changes to ensure all products and packaging from the previous production have been removed from the line before changing to the next production.

#### 6.2.3

Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labelled. These shall include checks:
- at the start of packing,
- during the packaging run,
- when changing batches of packaging materials
- at the end of each production run.

The checks shall also include verification of any printing carried out at the packing stage including, as appropriate:
- date coding
- batch coding
- quantity indication
- pricing information
- bar coding
- country of origin

#### 6.2.5

Where on line vision equipment is used to check product labels and printing, procedures shall be in place to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification.
Objective

- Encourage development of systems to avoid purchase of fraudulent products
- Response to requirements of EU Report 2013/2091

Change

- **3 new clauses:**
  - Access to information to inform risk assessments
  - Vulnerability assessment of raw materials
  - Introduction of risk based testing or assurance to mitigate risk.
<table>
<thead>
<tr>
<th><strong>5.4</strong></th>
<th><strong>Product Authenticity, Claims and Chain of Custody</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Statement of Intent</strong></td>
<td>Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated raw materials and ensure that all product descriptions and claims are legal accurate and verified.</td>
</tr>
</tbody>
</table>
| **5.4.1** | The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of raw materials. Such information may come from:  
- trade associations  
- government sources  
- private resource centres. |
| **5.4.2** | A documented vulnerability assessment shall be carried out of all food raw materials or groups of raw materials to assess the potential risk of adulteration or substitution. This shall take into account:  
- historical evidence of substitution or adulteration  
- economic factors which may make adulteration or substitution more attractive  
- ease of access to raw materials through the supply chain  
- sophistication of routine testing to identify adulterants.  
Nature of the raw material  
The vulnerability assessment shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risk. It shall be formally reviewed annually. |
| **5.4.3** | Where raw materials are identified as being at particular risk of adulteration or substitution appropriate assurance and/or testing processes shall be in place to reduce the risk. |
Ambient High Care

Definition

- Environment designed to minimize product contamination
- A raw material is prone to contamination with a vegetative pathogen
- Production process includes a process step which removes or reduces the pathogen
- Finished products are stored at ambient temperatures
- Final product is ready to eat or heat
- Finished products are such that vegetative pathogens could survive and grow in normal use, subsequently causing food poisoning, or are of a nature that enables food poisoning to result from a very low level of contamination
### Ambient High Care

<table>
<thead>
<tr>
<th>4.3</th>
<th>Layout, Product Flow and Segregation</th>
</tr>
</thead>
</table>
| **4.3.7** | Where ambient high care areas are required a documented risk assessment shall be completed to determine the risk of cross-contamination with pathogens. The risk assessment shall take into account the potential sources of microbiological contamination and include:  
  - the raw materials and products  
  - flow of raw materials, products, equipment, personnel and waste  
  - airflow and air quality  
  - utilities (including drains)  

Effective processes shall be in place to protect the final product from this contamination. These processes may include segregation, management of process flow or other controls. |
<table>
<thead>
<tr>
<th>Changes to the Standard &amp; Protocol</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minor changes to existing requirements</td>
</tr>
<tr>
<td>Unannounced audits remain voluntary but extended to be accessible to all</td>
</tr>
<tr>
<td>Enrolment program broken into 3 tier audit renamed BRC Global Markets</td>
</tr>
<tr>
<td>BRC Participate</td>
</tr>
<tr>
<td><a href="http://www.brcparticipate.com">www.brcparticipate.com</a></td>
</tr>
</tbody>
</table>
US performance by Category
Grade & minors per audit

Top 10 categories, new & renewal 2014 audits

BRC Global Standards. Trust in Quality.
US VS Rest Of The World
Minors per audit

Top 10 US categories, new & renewal 2014 audits
US VS Rest Of The World
A Grade %

Top 10 US categories, new & renewal 2014 audits
## Top 10 Food Clauses
### US New Vs Renewal 2014 Food Audits

<table>
<thead>
<tr>
<th>New</th>
<th>Description</th>
<th>Sat %</th>
<th>Renewal</th>
<th>Description</th>
<th>Sat %</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.9.1.1</td>
<td>Chemical Control</td>
<td>28.3</td>
<td>4.9.1.1</td>
<td>Chemical Control</td>
<td>18.9</td>
<td>-9.4</td>
</tr>
<tr>
<td>4.4.9</td>
<td>Doors</td>
<td>18.7</td>
<td>4.11.1</td>
<td>Housekeeping</td>
<td>18.0</td>
<td>1.4</td>
</tr>
<tr>
<td>4.11.1</td>
<td>Housekeeping</td>
<td>16.6</td>
<td>4.4.9</td>
<td>Doors</td>
<td>16.7</td>
<td>-2.0</td>
</tr>
<tr>
<td>3.2.1</td>
<td>Document Control</td>
<td>16.0</td>
<td>4.6.1</td>
<td>Equipment</td>
<td>16.7</td>
<td>3.8</td>
</tr>
<tr>
<td>3.7.1</td>
<td>Corrective Action</td>
<td>13.9</td>
<td>3.2.1</td>
<td>Document Control</td>
<td>13.8</td>
<td>-2.3</td>
</tr>
<tr>
<td>4.8.6</td>
<td>Staff Facilities</td>
<td>13.9</td>
<td>4.4.5</td>
<td>Ceilings</td>
<td>13.6</td>
<td>0.8</td>
</tr>
<tr>
<td>4.4.5</td>
<td>Ceilings</td>
<td>12.8</td>
<td>3.3.1</td>
<td>Record Completion</td>
<td>11.7</td>
<td>-0.6</td>
</tr>
<tr>
<td>4.6.1</td>
<td>Equipment</td>
<td>12.8</td>
<td>4.7.3</td>
<td>Maintenance</td>
<td>10.1</td>
<td>-3.8</td>
</tr>
<tr>
<td>4.9.3.2</td>
<td>Glass, Brittle Plastic</td>
<td>12.8</td>
<td>4.8.6</td>
<td>Staff Facilities</td>
<td>10.0</td>
<td>-3.9</td>
</tr>
<tr>
<td>3.3.1</td>
<td>Record Completion</td>
<td>12.3</td>
<td>4.4.1</td>
<td>Walls</td>
<td>9.0</td>
<td>-2.7</td>
</tr>
</tbody>
</table>

Special mention: HACCP NC’s – flow diagram and risk assessment
4.9.1.1 Chemical Control

Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination. These shall include as a minimum:

- an approved list of chemicals for purchase
- availability of material safety data sheets and specifications
- confirmation of suitability for use in a food processing environment
- avoidance of strongly scented products
- the labelling and/or identification of containers of chemicals at all times
- segregated and secure storage with restricted access to authorised personnel
- use by trained personnel only.

- Routine internal audit inspection, focussed, dedicated inspector
- Do not take away necessary tools
- Involve maintenance and production
- Purchasing procedures for approvals
4.4.9 Doors

Doors shall be maintained in good condition. External doors and dock levellers shall be close fitting or adequately proofed. External doors to open product areas shall not be opened during production periods except in emergencies.

✓ Promote to maintenance responsibility
✓ Routine inspection, followed by internal audit
✓ Manage the behaviour creating the issue (RCA, 5 why’s)
✓ Manage the risks when less than perfect (pest monitoring, primary external exclusion, secondary internal barrier)
4.11.1 Housekeeping

Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures shall as a minimum include the:

• responsibility for cleaning
• item/area to be cleaned
• frequency of cleaning
• method of cleaning, including dismantling equipment for cleaning purposes where required
• cleaning chemicals and concentrations
• cleaning materials to be used
• cleaning records and responsibility for verification.

The frequency and methods of cleaning shall be based on risk.
The procedures shall be implemented to ensure appropriate standards of cleaning are achieved.

✓ Internal audit to your procedures
✓ Simplify, don’t complicate
✓ Most common issue is efficacy
3.2.1 Document Control

The company shall have a procedure to manage documents which form part of the food safety and quality system. This shall include:

- a list of all controlled documents indicating the latest version number
- the method for the identification and authorisation of controlled documents
- a record of the reason for any changes or amendments to documents
- the system for the replacement of existing documents when these are updated.

- Verify and train the obsolete document purge procedure
- Define a simple, effective document control system
  - Train all departments
  - Departments should be performing their own internal audits for efficiency
3.7.1 Corrective Action

The company shall have a documented procedure for handling non-conformances identified within the scope of this Standard to include:

- clear documentation of the non-conformity
- assessment of consequences by a suitably competent and authorised person
- identification of the corrective action to address the immediate issue
- identification of an appropriate timescale for correction
- identification of personnel with appropriate authority responsible for corrective action
- verification that the corrective action has been implemented and is effective
- identification of the root cause of the non-conformity and implementation of any necessary corrective action.

✓ Source good training on CA and RCA – site wide
✓ Cultural habit: never document a problem without documenting a solution
4.8.6 Staff Facilities

Suitable and sufficient hand-washing facilities shall be provided at access to, and at other appropriate points within, production areas. Such hand-wash facilities shall provide as a minimum:

• sufficient quantity of water at a suitable temperature
• liquid soap
• single use towels or suitably designed and located air driers
• water taps with hand-free operation
• advisory signs to prompt hand-washing.

✓ Employees must follow hand washing policies 100%
✓ Assess placement based on flow, work areas, and likely need
4.4.5 Ceilings, 4.6.1 Equipment

Ceilings and overheads shall be constructed, finished and maintained to prevent the risk of product contamination.

All equipment shall be constructed of appropriate materials. The design and placement of equipment shall ensure it can be effectively cleaned and maintained.

- Look up!
- Inspect with the perspective “stuff shouldn’t fall into our product”
- Engage sanitation on post installation equipment design and modifications
4.9.3.2 Glass Control

Documented procedures for handling glass and other brittle materials shall be in place and implemented to ensure that necessary precautions are taken. Procedures shall include as a minimum:

- a list of items detailing location, number, type and condition
- recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product
- details on cleaning or replacing items to minimise potential for product contamination.

- Most NC’s are based on not following your own procedures
- Focus on glass that poses a risk
- Evaluate your glass list
- Historical “gotcha!” clause
3.3.1 Record Completion

Records shall be legible, retained in good condition and retrievable. Any alterations to records shall be authorised and justification for alteration shall be recorded. Where records are in electronic form these shall be suitably backed up to prevent loss.

✓ Site wide training topic (focus on corrections)
✓ Checks made one level up, internal audit check system
2.5.1 Flow Diagram

A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP scope, from raw material receipt through to processing, storage and distribution. As a guide, this should include the following, although this is not an exhaustive list:

- plan of premises and equipment layout
- raw materials including introduction of utilities and other contact materials, e.g. water, packaging
- sequence and interaction of all process steps
- outsourced processes and subcontracted work
- process parameters
- potential for process delay
- rework and recycling
- low/high-care/high-risk area segregation
- finished products, intermediate/semi-processed products, by-products and waste.

✔ Team verify the diagram on the floor
The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and allergen risks (refer to clause 5.2). It shall also take account of the preceding and following steps in the process chain.

- Challenge yourselves, annually
- Don’t leave off hazards not controlled, or controlled by pre-requisites
- Define triggers for re-assessment
- Include sufficient level of detail (i.e. not “pathogens” if it is Salmonella)
Basics

• Train
• Internal audit
• Corrective action and root cause analysis
Q & A time

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If You Know Better, You Would Do Better

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Compliance Specialist
SQF Institute

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04/08/2015
Outline

• What do we know?
  – 2014 food safety incident summary
  – SQF Audit Top 10 Non-conformances

• What do we have?
  – SQF program
  – Areas of focus

• What can we do?
  – Internal audit/Gap analysis
  – Employee awareness
How Do We Hear About Recalls?

- Social media
- News media
- Government agencies
- Food safety websites
- Friends and family
Estimates of foodborne illnesses in the United States

1 in 6 gets sick
128,000 are hospitalized
3,000 die of foodborne diseases
2014 Outbreak Summary

- 6 outbreaks in the USA
  - 2 linked to E-coli, 2 linked to Listeria, 2 linked to Salmonella
    - Variety of products affected: clover products, dairy, beef and apples
    - Almost 200 people became sick
    - 7 deaths in total were reported

<table>
<thead>
<tr>
<th>Disease Agents</th>
<th>Sick</th>
<th>Death</th>
<th>Products</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>E. coli</em> O157:H7</td>
<td>12</td>
<td>0</td>
<td>Ground beef</td>
</tr>
<tr>
<td><em>E. coli</em> O121</td>
<td>19</td>
<td>0</td>
<td>Clover sprouts</td>
</tr>
<tr>
<td><em>Listeria monocytogenes</em></td>
<td>7</td>
<td>1</td>
<td>Dairy products</td>
</tr>
<tr>
<td><em>Listeria Monocytogenes</em></td>
<td>32</td>
<td>6</td>
<td>Caramel apples, Granny Smith, Gala</td>
</tr>
<tr>
<td><em>Salmonella Stanley</em></td>
<td>17</td>
<td>0</td>
<td>Cashew products</td>
</tr>
<tr>
<td><em>Salmonella Hartford</em></td>
<td>94</td>
<td>0</td>
<td>Dairy products</td>
</tr>
</tbody>
</table>
2014 Recall Summary

• 2155 recalls in total
  – Among those, 6.6% were from SQF certified supplier
• Chemical hazard was the #1 reason
  – 78.6% recalls are due to allergen undeclared, which is 36.3% of total
  – 10% increases compared with 2013
• 3.3% decrease in Biological recalls
• Significantly decrease in other issue recalls, e.g. quality issues (7.8%)

Data collected on Jan. 20, 2015
Supplier Recalls

2014 2155 Recalls

- 26.3% Biologic al
- 19.3% Other Issue
- 8.2% Physical
- 46.2% Chemical
- 42.0% Chemical
- 35.7% Biological

143 SQF certified supplier recalls

Data collected on Jan. 20, 2015
2013 Vs. 2014

- Good trending: 0.1% decrease in recalls from SQF certified suppliers
- 6% increase in the recalls affected by other suppliers
  - From farm to fork, the whole supply system

Data collected on Jan. 20, 2015
In the USA

- FDA categorized the top 3 recall reasons
  - Undeclared allergen
  - Salmonella contamination
  - Listeria contamination

# Food Safety Progress Report for 2013

<table>
<thead>
<tr>
<th>Disease Agents</th>
<th>Percentage change in 2013 compared with 2006–2008</th>
<th>2013 rate per 100,000 Population</th>
<th>2020 target rate per 100,000 Population</th>
<th>CDC estimates that...</th>
</tr>
</thead>
<tbody>
<tr>
<td>Campylobacter</td>
<td>![Sad] 13% increase</td>
<td>13.82</td>
<td>![Alarm] 8.5</td>
<td>For every Campylobacter case reported, there are 30 cases not diagnosed</td>
</tr>
<tr>
<td>Escherichia coli O157</td>
<td>![Sad] No change</td>
<td>1.15</td>
<td>![Alarm] 0.6</td>
<td>For every E. coli O157 case reported, there are 26 cases not diagnosed</td>
</tr>
<tr>
<td>Listeria</td>
<td>![Sad] No change</td>
<td>0.26</td>
<td>![Alarm] 0.2</td>
<td>For every Listeria case reported, there are 2 cases not diagnosed</td>
</tr>
<tr>
<td>Salmonella</td>
<td>![Sad] No change</td>
<td>15.19</td>
<td>![Alarm] 11.4</td>
<td>For every Salmonella case reported, there are 29 cases not diagnosed</td>
</tr>
<tr>
<td>Vibrio</td>
<td>![Sad] 75% increase</td>
<td>0.51</td>
<td>![Alarm] 0.2</td>
<td>For every Vibrio parahaemolyticus case reported, there are 142 cases not diagnosed</td>
</tr>
<tr>
<td>Yersinia</td>
<td>![Sad] No change</td>
<td>0.36</td>
<td>![Alarm] 0.3</td>
<td>For every Yersinia case reported, there are 123 cases not diagnosed</td>
</tr>
</tbody>
</table>

For more information, see [http://www.cdc.gov/foodnet/](http://www.cdc.gov/foodnet/)

Preliminary FoodNet 2013 Data
Foster A Positive Food Safety Culture!

- Why Have an SQF Program?
  - Emphasis on corrective action
  - Enhanced management commitment
  - Strong root cause analysis
  - Correct best-practice implementation
Who is SQF?

• SQF- Safe Quality Foods

• SQF Program
  – Owned by Food Marketing Institute (FMI)
  – Operated by the SQF Institute (SQFI), a division of FMI
  – Reviewed by stakeholder input and oversight
    ▪ GFSI Benchmarking Process
    ▪ Technical Advisory Council (TAC) Review—made up of segments from all stakeholders in industry (retailers, foodservice, suppliers, service providers)
    ▪ Public Comments and feedback
SQF Program

• An SQF Program
  – A global program
  – A fully integrate food safety and quality management
  – Specified food industries
  – Ensuring of consistency in the food safety standards
  – Assisting suppliers in developing and implementing the food safety and quality management system
    • HACCP based
SQF Certificates

• Over 30 Countries
• Key countries include US, Australia, Canada, Japan and Mexico
• SQF representatives in Australia and Mexico

UNITED STATES, 68.053%
AUSTRALIA, 14.343%
CANADA, 8.331%
JAPAN, 4.008%
MEXICO, 2.812%
KOREA, REPUBLIC OF, 0.748%
PERU, 0.284%
NEW ZEALAND, 0.269%
INDIA, 0.239%
THAILAND, 0.179%
GUATEMALA, 0.150%
CHINA, 0.105%
COLOMBIA, 0.030%

Other, 2.438%
Ecuador; Honduras; Indonesia (0.030%); Costa Rica; Dominican Republic; Marshall Islands; Suriname; United States Minor Outlying Islands (0.015%)
SQF and GFSI

- The Global Food Safety Initiative (GFSI)
- SQFI has been involved with GFSI since its inception in 2000
- SQF is one of the original four benchmarked schemes (BRC, IFS, Dutch HACCP and SQF)
- SQFI continues to play a pro-active role in GFSI Working Groups

- GFSI publishes the Guidance Document that all scheme owners are required to use for benchmarking
SQF Industry Scopes
• Feed Production
• Farming of Animals
• Farming of Fish
• Farming of Plants
• Farming of Grains and Pulses
• Pre-processing of animal products
• Pre-processing of plant products
• Production of (bio) chemicals
• Processing
• Transport and Distribution Services
• Production of Food Packaging

J The Provision of Transport and Distribution Services (Perishable J1 & Ambient J2)

<table>
<thead>
<tr>
<th>I</th>
<th>The Provision of Food Safety Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>K</td>
<td>Processing Equipment Manufacture</td>
</tr>
<tr>
<td>M</td>
<td>Production of Food Packaging</td>
</tr>
<tr>
<td>N</td>
<td>Food Broker/ Agent</td>
</tr>
</tbody>
</table>

Farm to Fork
Total Certificates Issued based on FSCs

1. Production, Capture and Harvesting of Livestock and Game Animals
2. Growing and Harvesting of Animal Feeds
3. Growing and Production of Fresh Produce
4. Fresh Produce Packhouse Operations
5. Extensive Broad Acre Agriculture Operations
6. Harvest and Intensive Farming of Fish
7. Slaughterhouse, Boning, and Butchery Operations
8. Processing of Manufactured Meats and Poultry
9. Seafood Processing
10. Dairy Food Processing
11. Honey Processing
12. Egg Processing
13. Bakery and Snack Food Processing
14. Fruit and Vegetable Processing
15. Canning, Pasteurizing, UHT and Aseptic Operations
16. Ice, Drink, Beverage Processing
17. Confectionary Manufacturing
18. Preserved Food Manufacturing
19. Food Ingredient Manufacture
20. Recipe Meals Manufacture
21. Processing of Cereal Grains and Nuts
22. Oils, Fats, and the Manufacture of oil or fat-based spreads
23. Food Catering and Food Service Operations
24. Food retailing
25. Fresh Produce Wholesaling and Distribution
26. Food Wholesaling and Distribution
27. Manufacture of Food Sector Packaging Materials
28. Provision of Crop Spray Services
29. Provision of Field Harvest Services
30. Provision of Sanitation and Hygiene Services
31. Manufacture of Dietary Supplements
32. Manufacture of Pet Food
33. Manufacture of Agricultural Chemicals and Food Processing Aides
34. Manufacture of Animal Feeds
35. Broker or Agent
Accreditation & Certification

- **Certification**
  - Issuing a certificate to a Supplier by a Certification Body after passing a Certification or Re-certification Audit
  - A Certification Body certifies a supplier

- **Accreditation**
  - Verification by an Accreditation Body of a Certification Body confirming they meet and continue to meet requirements established by SQFI
  - An Accrediting Body accredits a Certification Body
3rd Party Supplier Audit System

Certification Bodies

Audits the Supplier

Supplier
Supplier
Supplier
Supplier
Audit Checklist
Accredited Certification

International Accreditation Forum (IAF)

Peer Review by Sister Accreditation Body

Accreditation Bodies

Accredits the Certification Body (CB) Including Witness Audits of SQF Auditor Activity

Certification Bodies

Audits the Supplier

Suppliers

Comprised of National Accreditation Bodies

ISO/IEC 17011

ISO/IEC Guide 65 SQF Criteria for Certification Bodies

SQF System
SQF Primary Stakeholders

• Accreditation Bodies
• Certification Bodies
• Training Centers
• SQF Professionals
  – Auditors
  – Consultants
  – Trainers
• Suppliers
• SQF Practitioners
• Buyers (Retailers)
Managing the SQF Program

Accreditation Body

Accredits

Certification Body

Audits & Certifies

SQF Certified Supplier

Implements & Maintains SQF System

SQF Auditor

Trains

SQF Institute

License

Register

License

SQF Training Center & Regional Representative

SQF Practitioner

Trains

SQF Consultant
The SQF Code

• The core of SQF program

• Modularized to provide a farm to fork solution

• Designed around the GFSI Industry Scopes

• Includes 35 different food sector categories to meet the needs of all suppliers

• Auditors are credentialed in specific food sector categories

• 3 levels of certification with a unique approach to food quality
The SQF Certification

3 Levels of Certification

Level 1
Food Safety Fundamentals

Level 2
HACCP for Food Safety

Level 3
HACCP for Quality
SQF Code - Format

Part A: Implementing and Maintaining the SQF Code
1. Preparing for SQF certification
2. The Certification Process
3. The Certification Decision
4. Surveillance and Re-certification
5. Obligations of Suppliers and Certification Bodies

Part B: The SQF Code
Module 1: Scope, References, and Definitions
Module 2: SQF System Elements
Modules 3 – 15: Food Safety Fundamentals (GAP/GMP/GDP)
Module 16: Multi-site Program
Appendix 1: Food Sector Categories
Appendix 2: Glossary
Appendix 3: Rules of using SQF logo and shield

Pre-farm gate: Module 5-8
Post-farm gate: Module 9-13
### Part B – The SQF Code, edition 7

<table>
<thead>
<tr>
<th>Module</th>
<th>Description</th>
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<tbody>
<tr>
<td>Module 2</td>
<td>SQF System Elements (applies to all Suppliers)</td>
</tr>
<tr>
<td>Module 3</td>
<td>GAP for Single Feed Production</td>
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<td>Module 4</td>
<td>GAP for Compound Feed Production</td>
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<td>Module 5</td>
<td>GAP for Farming of Animal Products</td>
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<td>GAP for Farming of Fish</td>
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<td>Module 7</td>
<td>GAP for Farming of Plant Products</td>
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<td>Module 8</td>
<td>GAP for Farming of Grains and Pulses</td>
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<td>Module 9</td>
<td>GMP for Pre-processing of Animal Products</td>
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<td>Module 10</td>
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<td>Module 11</td>
<td>GMP for Processing of Food Products</td>
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<td>Module 12</td>
<td>GMP for Transport and Distribution of Food</td>
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<td>Module 13</td>
<td>GMP for Production of Food Packaging</td>
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<td>Module 14</td>
<td>GMP for Food Brokers (TBD)</td>
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<td>Module 15</td>
<td>GMP for Food Retail, Food Service (TBD)</td>
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<td>Module 16</td>
<td>SQF Multi-site Program</td>
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Supplier selects relevant module(s)
GFSI Submitted Scopes

Module 3: GMP for Animal Feed Production (FSC: 34) Approved
Module 4: GMP for Processing of Pet Food (FSC: 32) Approved
Module 5: Farming of Animals (FSC: 1) ✓ Approved
Module 6: Farming of Fish (FSC: 6) not benchmarked; need 10 certificates
Module 7: Farming of Plants (FSC: 3) ✓ Approved
Module 7H: Farming of Plants (FSC: 3) Preparing to submit to GFSI
Module 8: Farming of Grains and Pulses (FSC: 5) not benchmarked; need 10 certificates
Module 9: Animal Conversion (FSC: 7) ✓ Approved
Module 10: Pre Processing Handling of Plant Products (FSC: 4) ✓ Approved
Module 11: Processing of Animal Perishable Products (FSC: 8,9,10,11, 12) ✓ Approved
Module 11: Processing of Plant Perishable Products (FSC: 14, 22) ✓ Approved
Module 11: Processing of Animal and Plant Perishable Products (FSC: 20, 21) ✓ Approved
Module 11: Processing of Ambient Stable Products (FSC: 13, 15, 16, 17, 18) ✓ Approved
Module 12: Provision of Transport and Storage Services (FSC 25, 26) ✓ Approved (Dec., 2014)
Module 11: Production of (Bio) Chemicals (FSC: 19, 31) ✓ Approved
Module 13: Production of Food Packaging (FSC: 2) ✓ Approved
Module 14: GMP for Brokers and Agents
Module 15: GMP for Food Catering, Wholesale and Retail
## Mandatory Elements

Code elements that cannot be exempted and must be answered:

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<tr>
<th>Code</th>
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<td>Food Safety Fundamentals</td>
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<td>2.5.2</td>
<td>Validation and Effectiveness</td>
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<td>Verification and Monitoring</td>
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<td>2.5.5</td>
<td>Corrective and Preventative Action</td>
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<td>2.5.7</td>
<td>Internal Audit</td>
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<td>2.6.2</td>
<td>Product Trace</td>
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<td>2.6.3</td>
<td>Product Withdrawal and Recall</td>
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<tr>
<td>2.7.1</td>
<td>Food Defense</td>
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<td>2.9.2</td>
<td>Training Program</td>
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</table>
Integrating Food Safety

SQF System Requirements
- Management Commitment
- Documentation and Records
- Specification and Product Development
- Attaining Food Safety
- Verification
- ID/Trace/Recall
- Site Security
- Identity Preserved Foods (Quality)
- Training

Technical Elements (Growing of fresh produce)
- Site Requirements and Approval
- Product handling, Storage and Equipment
- Personnel Hygiene and Welfare
- Field Packaging and Handling Practices
- Water Management
- Storage and Transport
- Harvesting
- Waste Disposal

System Elements
- Module 2

Technical Elements
- Module 7
Integrating Food Safety

SQF System Requirements (System Elements)
- Management Commitment
- Documentation and Records
- Specification and Product Development
- Attaining Food Safety Verification
- ID/Trace/Recall
- Site Security
- Identity Preserved Foods (Quality)
- Training

System Elements

Technical Elements (Food Processing)
- Site Requirements and Approval
- Construction and Operational Approval
- Personnel Hygiene and Welfare
- Personnel Practices
- Water, Ice and Air Supply
- Storage and Transport
- Separation of Functions
- On-site Laboratories
- Waste Disposal
- Exterior
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<th>Minor</th>
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<tr>
<td>1 11.2.12.1 Equipment, Utensils and Protective Clothing</td>
<td>2.4.3.1 Food Safety Plan (2, 3) (M)</td>
<td>2.4.3.1 Food Safety Plan (2, 3) (M)</td>
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<td>2 2.4.3.1 Food Safety Plan (2, 3) (M)</td>
<td>2.4.3.1 Food Safety Plan (2D, 3D) (M)</td>
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<td>3 11.2.3.1 Walls, Partitions, Doors and Ceilings</td>
<td>2.5.1.2 Responsibility Frequency and Methods (2D)</td>
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<td>4 11.2.2.1 Floors, Drains and Waste Traps</td>
<td>2.5.2.1 Validation and Effectiveness (2D) (M)</td>
<td>2.3.1.5 Specification and Product Development (2, 3)</td>
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<td>10.2.13.4 Cleaning and Sanitation</td>
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<td>6 11.2.7.1 Dust, Fly and Vermin Proofing</td>
<td>11.7.4.1 High Risk Processes</td>
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<td>7 11.7.5.3 Control of Foreign Matter Contamination</td>
<td>11.2.11.1 Management of Pests and Vermin</td>
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<td>8 11.2.13.1 Cleaning and Sanitation</td>
<td>2.8.2.1 Allergen Management (2, 3)</td>
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<td>9 11.4.1.1 Staff Engaged in Food Handling and Processing Operations</td>
<td>11.7.6.2 Detection of Foreign Objects</td>
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<td>10 2.1.6.3 Business Continuity Planning (2, 3)</td>
<td>11.7.5.1 Control of Foreign Matter Contamination</td>
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## Risk From Top Non-Conformances That Can Affect Product Recalls – Pre-Farm

### Module 2

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<td>2.4.3.1 Food Safety Plan</td>
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<tr>
<td>2.1.6.3 Business Continuity Planning</td>
<td>(2, 3)</td>
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<tr>
<td>2.2.2.2 Records</td>
<td>(2, 3) (M)</td>
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<td>2.2.1.2 Document Control</td>
<td>(2, 3) (M)</td>
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<td>2.6.3.1 Product Withdrawal and Recall</td>
<td>(2, 3) (M)</td>
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<td>2.5.7.1 Internal Audits</td>
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<td>2.2.1.1 Document Control</td>
<td>(2, 3) (M)</td>
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<td>2.6.3.3 Product Withdrawal and Recall</td>
<td>(2, 3) (M)</td>
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<td>2.6.2.1 Product Trace</td>
<td>(2, 3) (M)</td>
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<td>2.3.3.1 Contract Service Providers</td>
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### Module 7

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<tr>
<td>7.6.1.3 Storage of Hazardous Chemicals, Toxic Substances, and Petroleum Products</td>
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<tr>
<td>7.3.2.1 Sanitary Facilities and Hand Washing</td>
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<td>7.7.4.3 Agricultural Chemicals</td>
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<td>7.2.6.4 Vehicles, Equipment and Utensils</td>
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<td>7.2.9.1 Pest and Vermin Management</td>
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<td>7.2.8.3 Calibration of Equipment</td>
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<td>7.3.4.1 Jewelry and Personal Effects</td>
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<td>7.2.6.1 Vehicles, Equipment and Utensils</td>
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<td>7.2.11.1 Cleaning and Sanitation</td>
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<td>7.3.1.1 Personnel Practices</td>
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# Risk From Top Non-Conformances That Can Affect Product Recalls – Post-Farm

## Module 2

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<tr>
<th>Topic</th>
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<tbody>
<tr>
<td>2.4.3.1 Food Safety Plan</td>
<td>(2, 3) (M) (full program)</td>
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<tr>
<td>2.2.2.2 Records</td>
<td>(2, 3) (M) (legible and reviewed)</td>
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<tr>
<td>2.5.7.1 Internal Audits</td>
<td>(3) (M) (full program)</td>
</tr>
<tr>
<td>2.8.2.1 Allergen Management</td>
<td>(2, 3) (full program inc validation)</td>
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<tr>
<td>2.1.6.3 Business Continuity Planning</td>
<td>(2, 3) (annual testing)</td>
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<td>2.4.4.1 Food Quality Plan</td>
<td>(3) (M) (full program)</td>
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<td>2.6.3.1 Product Withdrawal and Recall</td>
<td>(2, 3) (M) (full program)</td>
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<td>2.5.5.2 Corrective and Preventative Action</td>
<td>(2, 3) (M) (records of investigation and CA)</td>
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<td>2.6.2.1 Product Trace</td>
<td>(2, 3) (M) (effectiveness of traceability, annual test)</td>
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<td>2.3.3.1 Contract Service Providers</td>
<td>(3) (specifications of service and training)</td>
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## Module 11

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<tr>
<td>11.2.12.1 Equipment, Utensils and Protective Clothing</td>
<td>(condition of equipment and utensils)</td>
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<tr>
<td>11.2.3.1 Walls, Partitions, Doors and Ceilings</td>
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<tr>
<td>11.2.2.1 Floors, Drains and Waste Traps</td>
<td>(floors)</td>
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<td>11.2.7.1 Dust, Fly and Vermin Proofing</td>
<td>(outer openings)</td>
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<td>11.7.5.3 Control of Foreign Matter Contamination</td>
<td>(Temporary repairs)</td>
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<td>11.2.13.1 Cleaning and Sanitation (SSOPs)</td>
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<td>11.4.1.1 Staff Engaged in Food Handling and Processing Operations</td>
<td>(Employee hygiene)</td>
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<td>11.2.11.1 Management of Pests and Vermin</td>
<td>(pest control program)</td>
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<td>11.2.9.2 Premises and Equipment Maintenance</td>
<td>(food contact zone repairs)</td>
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<td>11.7.5.4 Control of Foreign Matter Contamination</td>
<td>(glass policy)</td>
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### 2.6.2 Product Trace (M)

### 2.6.3 Product Withdrawal and Recall (M)

### 2.5.5 Corrective and Preventative Action (M)

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### 2.8.2 Allergen Management

#### 2.8.2.2 Allergen Labelling

#### Compliant

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#### FOOD LEGISLATION* ("allergen and additive labelling")

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</tr>
</tbody>
</table>

* Facility audits, 2013 only
### 2.4.2.2 Food Safety Fundamentals

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### 2.4.3 Food Safety Plan (M)

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### 2.5.2 Validation & Effectiveness

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### 2.5.6 Product Sampling, Inspection, Analysis

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### 11.7.4.3.1 High Risk Processes

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* Facility audits, 2013 only
### 2.4.4 Food Quality Plan

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### 2.6 Product Identification.1.1

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<td>1.3%</td>
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</tr>
</tbody>
</table>

* Facility audits, 2013 only
Getting Started with SQF

1. Visit the SQF website: www.sqfi.com
2. Register your company with SQF
3. Gain Management Commitment!
4. Learn about the Standard – attend a classroom training
5. Determine the food sector category and module for your facility.
6. Designate an employee as the SQF Practitioner – this will be the internal expert on SQF
7. Obtain proposals from potential Certification Bodies (CBs)
8. Conduct a pre-assessment – either a CB auditor or your SQF Practitioner can identify the “gaps” between your program and the desired level of SQF certification (optional)
9. CB conducts initial certification audits:
   • Document Audit
   • Facility Assessment
Start where you are

• Start today
• Conduct internal audit
• Conduct effective gap analysis
• Communicate the results
• Raise employee awareness
• Effective and practical training
Summary

SQF Implementation leads to:
• Facilities programs are robust and detailed
• Processes in place to monitor product checks
• Higher level of compliance to All programs
• Quality checks that are more detailed
• Product specification are clearly defined
• An increase in plant and manufacturing profits
• Reduction in customer complaints
• Improve Traceability
• Reduced Recalls and Withdrawals
SQF Learning Lunches

- **One hour** webinar
- Learn the latest food safety information
- Open to all SQF stakeholders
- Sessions are **free**
- Register at sqfi.com

Previous Webinars

- Recordings available on the SQFI website
- March 25 “A Practical Approach to Root Cause Analysis Methods”
  
  *Guest speaker: Anne Cooper, SAI Global*

Upcoming Webinar:

- April 22 “Effective Strategies for Evaluating and Responding to an Environmental Positive”
  
  *Guest speaker: Dave Evanson, Silliker*

Visit Events tab on SQFI Website (sqfi.com/events)
VISIT THE CONFERENCE WEBSITE:  [www.sqfconference.com](http://www.sqfconference.com)

- Submit a session topic by **April 30th**
- Sign up for a Pre-Conference Workshop
- See a schedule a events

**KEY BENEFITS**
- Hear the latest food safety information
- Updates to the SQF Program
- Network with your peers
- Meet new contacts and experts
- Learn about innovative solutions to everyday problems
- Become a more effective leader

**WHO SHOULD ATTEND**
- Food safety professionals at all levels of the supply chain
- Individuals from companies seeking to enhance current programs
- Companies beginning to implement a food safety program
- Food safety auditors and consultants
감사합니다
Natick
Grazie
Danke
Ευχαριστίες
Dalu
Köszönöm
Tack
Spasibo
Dank
Gracias
See
Merci
ありがとう
谢谢
감사합니다