This workbook is provided to assist in the implementation of your SQF Food Packaging Safety Management System Package. The workbook is divided into 8 steps that are designed to assist you in implementing your food packaging safety management system effectively:

- ✓ Step One: Introducing the SQF Food Packaging Safety System
- ✓ Step Two: Senior Management Implementation
- ✓ Step Three: Food Packaging Safety Management Implementation
- ✓ Step Four: Good Manufacturing Practices Implementation
- ✓ Step Five: Project Planning
- ✓ Step Six: HACCP Implementation
- ✓ Step Seven: Training
- ✓ Step Eight: Final Steps to SQF Certification

Note: The SQF Food Packaging Safety Management System Package includes a Start Up Guide which should be consulted to guide you through the contents of the package.

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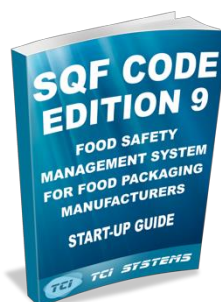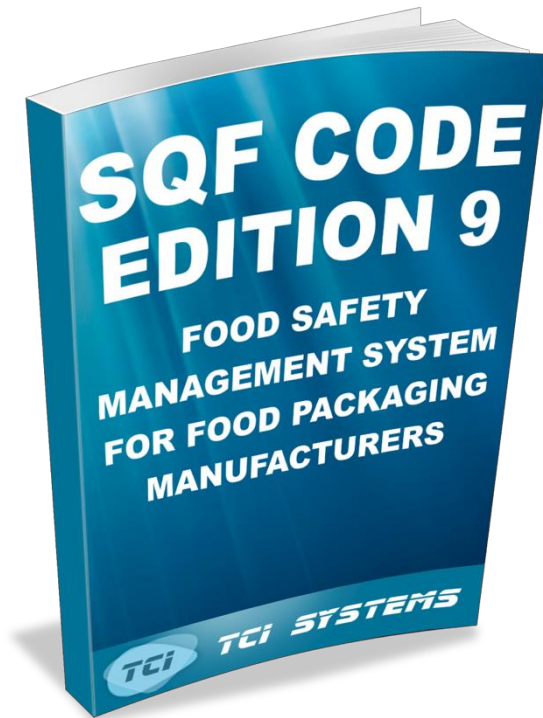
This Implementation Workbook compliments the SQF Food Packaging Safety Management System Package which is an ideal package for organizations looking to meet the requirements of the SQF Food Safety Code for Manufacture of Food Packaging Edition 9. The SQF Food Packaging Safety Management System Package contains:

- ✓ A comprehensive set of editable Food Packaging Safety Management System Procedures in Microsoft Word format compliant with SQF Code Edition 9 System Elements
- ✓ A comprehensive set of editable Good Manufacturing Practice Documents in Microsoft Word format compliant with SQF Code Edition 9 Module 13: Good Manufacturing for Production of Food Packaging
- ✓ A range of 60 easy to use Record Templates
- ✓ Additional HACCP Assistance including the Packaging Food Safety Planner - HACCP Calculator
- ✓ SQF Food Packaging Safety Management System Training, HACCP Training and Internal Audit Training Modules

And much more!

As a preliminary to Step 1 we recommend that you obtain a copy of the
SQF Food Safety Code for Manufacture of Food Packaging Edition 9

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Step One: Introduction to the SQF Food Packaging Safety Management System

Training Presentations for Food Packaging Management System Documents – System Elements and Good Manufacturing Practice Documents for Module 13: Good Manufacturing for Production of Food Packaging are provided.

The presentations will introduce the SQF Food Packaging Safety Management System Package to the management team and explain how to start the process of implementing an SQF compliant Food Packaging Safety Management System.

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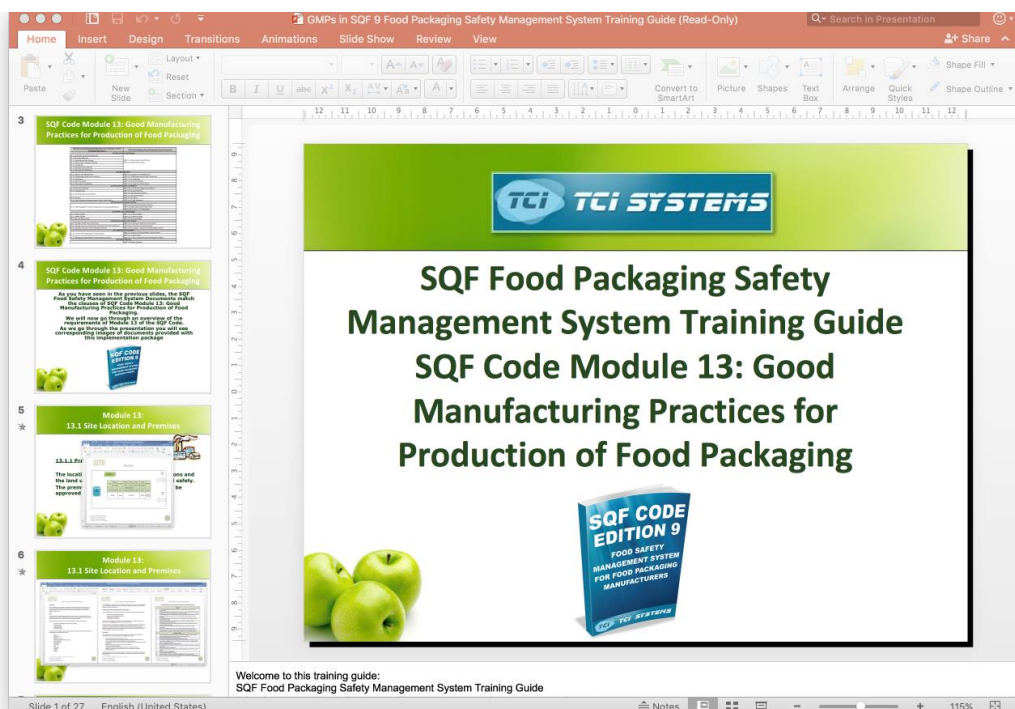
Step Two: Senior Management Implementation

A Senior Management Implementation checklist is provided that establishes your Food Packaging Safety Management System fundamentals including Food Safety Policies and Objectives.

The checklist guides Senior Management:

- ✓ in planning the establishment of the FPSMS
- ✓ in providing adequate support to establish the FPSMS
- ✓ in ensuring there is adequate infrastructure and work environment
- ✓ in allocating responsibility and authority

This stage requires the Senior Management to meet and establish the foundations for the Food Safety Management System:

- ✓ Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Packaging Safety requirements
- ✓ Decide which Food Packaging Safety requirements the company should address and develop relevant policies.
- ✓ Based on the Food Safety Policy Management Policies establish Food Safety Objectives
- ✓ Define the scope and boundaries of the FPSMS
- ✓ Plan the establishment of the FPSMS using the project planner
- ✓ Provide adequate support to establish the FPSMS
- ✓ Ensure there is adequate infrastructure and work environment
- ✓ Allocate responsibility and authority
- ✓ Assess, plan and establish appropriate internal and external communication (including the food chain) channels
- ✓ Plan to establish a food safety culture

A meeting should now be coordinated involving all the Senior Management Team.

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Senior Management FSMS Implementation Meeting

Date

Time

Venue

Agenda

1. Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Packaging Safety requirements
2. Decide which Food Packaging Safety requirements the company should address and develop relevant policies.
3. Based on the Food Safety Policy Management Policies establish Food Safety Objectives
4. Define the scope and boundaries of the FPSMS
5. Plan the establishment of the FPSMS using the project planner
6. Provide adequate support to establish the FPSMS
7. Ensure there is adequate infrastructure and work environment
8. Allocate responsibility and authority
9. Assess, plan and establish appropriate internal and external communication (including the food chain) channels
10. Plan to establish a food safety culture

Attendees:

Senior Management Team		
Job Title	**Name**	**Role in Team**
General Manager		Chairman
Operations Manager		Operations Reporting
Quality Manager		Food Safety Reporting SQF Practitioner
Planning Manager		Planning and Capacity Reporting
Distribution Manager		Distribution Reporting
Maintenance Manager		Services and Engineering Provision
Finance Manager		Financial Reporting
Human Resources Manager		Resource reporting

Senior Management FPSMS Implementation Checklist

The Senior Management FPSMS Implementation Meeting should follow the guidelines of the Senior Management Implementation Checklist:

	Senior management formulate a checklist of Customer, Regulatory, Statutory and other relevant Food Packaging Safety requirements	
	Customer/Regulatory/Statutory/Other	Record Details
Action (i)	XYZ Customer Requires this	
	SQF Code Edition 9	
	Food Packaging Regulations	
	Senior Management decides which Food Packaging Safety requirements the company should address & develop relevant policies.	
	Requirement	Policy Details
Action (ii)		

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At a later stage, Senior Management will be required to carry out a management review		
After implementation and verification Senior Management take action to continually improve the FSMS		

The outputs from this meeting will be:

- ✓ Food Safety Policy
- ✓ Food Safety Objectives
- ✓ Defined Scope
- ✓ A Developed Project Planner
- ✓ Support Plan for Implementation/Training
- ✓ Plans for Infrastructure/Work Environment
- ✓ Allocation of Responsibility/Authority including the appointment of an SQF Practitioner
- ✓ Defined Communication Channels
- ✓ An Action Plan to lead and support a food safety culture within the site

Senior Management can choose/adapt the templates supplied with the system to assist in documenting policies and objectives:

Food Safety Policy and Objectives
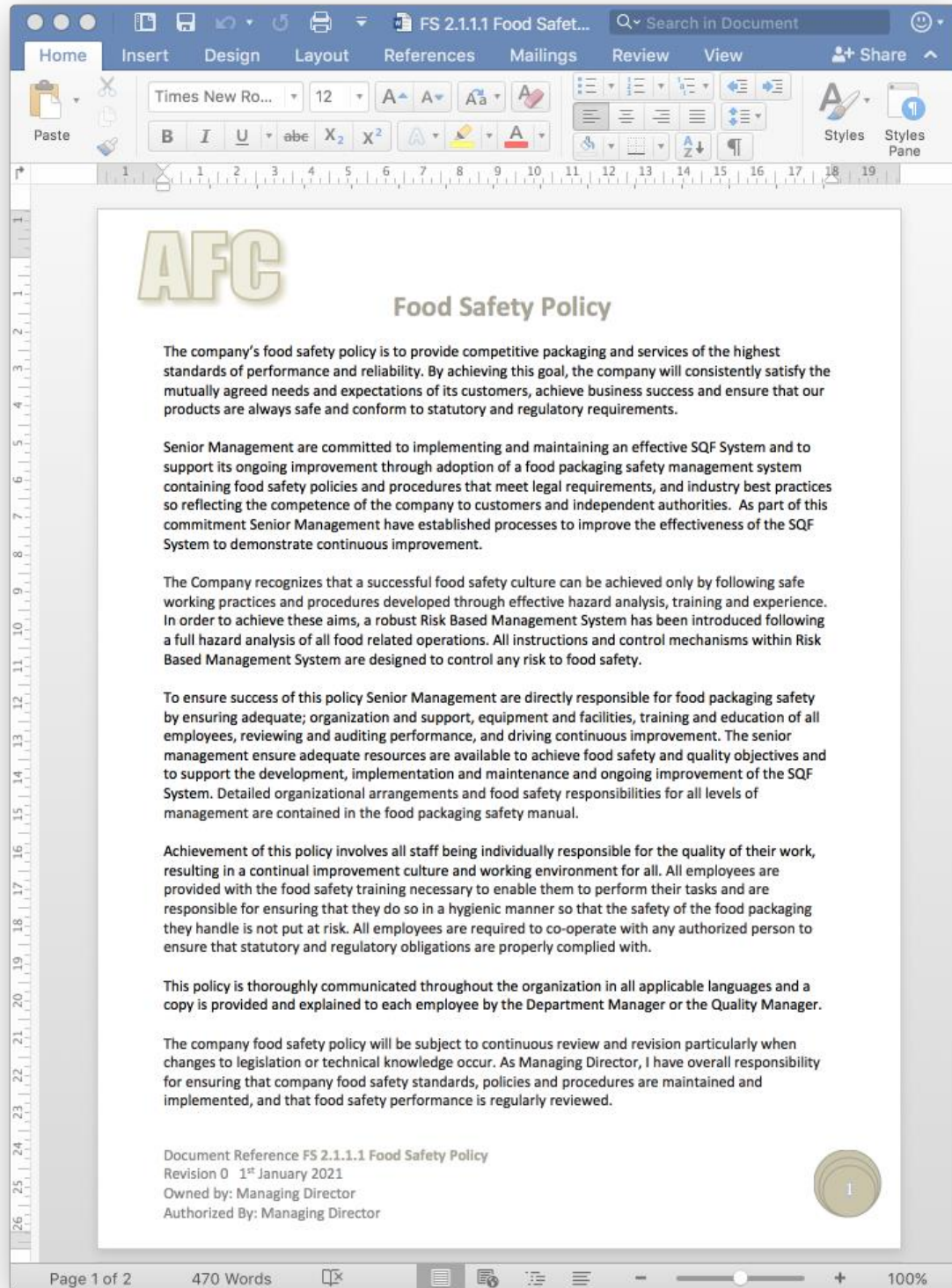
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Senior Management Define the Scope of the Food Packaging Safety Management System:

The scope of the Food Packaging Safety Management System includes all product categories, processes and activities conducted on site. These requirements are aligned with the policies and objectives of the site and include those of the SQF Food Safety Code for Manufacture of Food Packaging.

The scope of the Food Packaging Safety Management System includes all customer, statutory and regulatory documents applicable to the business:

- Food Packaging Regulations
- National/International Standards
- Customer Codes of Practice

The company has a system in place through the Industry Federation to ensure that it is kept informed of all relevant legislation, food safety issues, legislative scientific and technical developments and Industry Codes of Practice applicable in the country of production and, where known, the country where the product will be sold. This information is used for reference and Hazard Analysis.

Where products or services are outsourced the organization assumes full control of this process.

Senior Management Establish the Project Plan

Using the Excel Project Planner Senior Management adapt the template supplied with the system to establish a Project Plan.
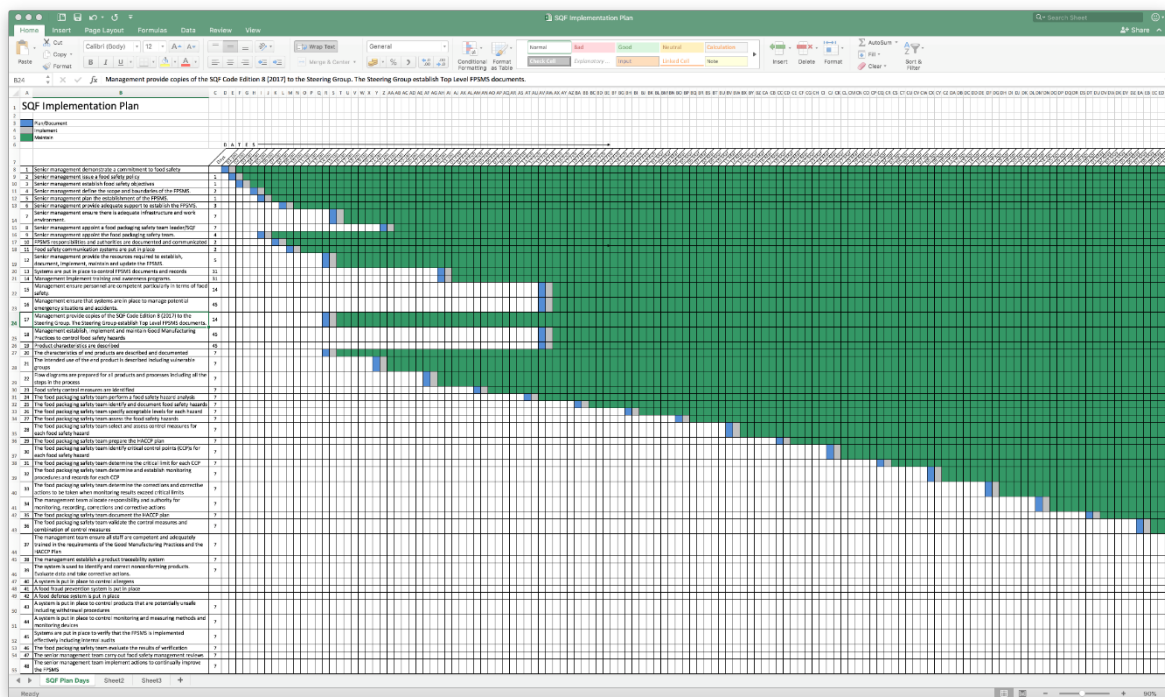
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Senior Management provide adequate support to establish the FPSMS

Senior management establish and provide adequate support to establish the FSMS including the resource required to complete the implementation plan, establish, implement and maintain the Food Packaging Safety Management System, conduct Internal Audits and Monitor & Measure.

	Senior management provide adequate support to establish the FPSMS	
	Resource requirement	Details
	Food Packaging Safety Team Leader/SQF Practitioner	
	Food Packaging Safety Team	
Action (vi)	FPSMS Steering Group	
	Trainers	
	Internal Auditors	

- ✓ *They are employed by the Supplier as a permanent full time employee and hold a position of responsibility in managing of the Food Packaging Safety Management System*
- ✓ *Have completed a HACCP Training Course and be experienced and competent to implement and maintain HACCP Plans*
- ✓ *Have an understanding of the* SQF Food Safety Code for Manufacture of Food Packaging Edition 8 *(Completion of the "Implementing SQF Systems Training Course Exam" would meet this requirement)*

The substitute SQF practitioner would normally be the nominated deputy for the Quality Manager. The substitute SQF practitioner will need to be qualified in the same way as the SQF practitioner

Site and Departmental Annual Objectives and targets are agreed and documented in the Management Review minutes.

<u>Key Personnel and Nominated Deputies</u>

Job Title	Job Holder	Nominated Deputy
Emergency Response Coordinator		
Food Packaging Safety Team Leader		
General Manager		
Operations Manager		
Production Manager		
Warehouse Manager		
Maintenance Manager		
Factory Safety Manager		
Human Resource Manager		
Production Supervisor		
Packing Manager		
Quality Manager		
Planning Manager		
Goods Receipt Manager		
Design and Development Manager		
Planning Manager		
Customer Service Manager		
Laboratory Manager		
Distribution Manager		
Project Manager		

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Senior Management Establish Food Packaging Safety Management System
Steering Group

Food Packaging Safety Management System Steering Group			
Team Member	**Name**	**Position**	**Qualification**

Senior Management Establish a Food Packaging Safety Team

Food Packaging Safety Team			
FPSMS Team	**Name**	**Position**	**Qualification**
FPSMS Team Leader			
FPSMS Assistant Leader			
FPSMS Team Members			

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Senior Management Establish an Internal Audit Team

Internal Audit Team			
Team	**Name**	**Position**	**Qualification**
Team Leader			
Assistant Leader			
Team Members			

Senior Management Establish a Product Recall/Crisis Management Team

Crisis Management/Product Recall Team			
Crisis	**Name**	**Crisis Coordinator**	**Contact Details**
Fire or Site evacuation		Safety Manager	
Flooding		Maintenance Manager	
Utility Supply failure		Maintenance Manager	
Storm Damage		Maintenance Manager	
IT systems failure		Operations Manager	
Water Supply Contamination		Quality Manager	
Breaches of security		General Manager	
Bomb Threat or Similar		General Manager	
Extortion or Sabotage		General Manager	
Hazardous Chemicals		Quality Manager	
Product quality or safety		Quality Manager	

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Senior Management Establish Food Packaging Safety Responsibility & Authority Levels

Example Key Responsibilities

Process	Responsible Persons	Activity
Purchases	Purchasing Manager	Purchase materials from approved and certified sources Ensure purchase orders comply with applicable specifications
	Quality Manager	Ensure adequate information on supply application form Ensure suppliers adhere to supply handling practices Perform suppliers audit or review supply status where necessary
Receiving and warehousing	QA/QC & Store Executives	Compare Purchase Order (PO) and Delivery Note (DN) or check contracts as per Suppliers Specifications criteria (if applicable) Check receiving temperature, pest infestations, quality, packing conditions and truck hygiene. Observe unloading practices Handle incoming goods as per documented procedures Ensure Good Storage Practices, FEFO and FIFO rotation principles
Preparation of Materials	QA/QC, Production Manager & Production Executive	Follow safe packaging preparation and handling practices Check environmental hygiene and safety Check equipment process performance and maintenance Check water quality and safety Check materials identification and traceability
Production	QC/QC, Production Manager, Supervisor & Operators	Maintain packaging formulations and characteristics Do not modify formulations prior to approval from top management Follow safe packaging handling practices Ensure Good Manufacturing Practices are adhered to Follow cleaning and sanitation standards and procedures
Coding and packing	Production Supervisor & Operators	Follow safe packing procedures Ensure food packaging is hygienically located Ensure coding for traceability is performed to procedures Follow secondary packaging procedures to protect products

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Senior Management Establish Food Packaging Safety Responsibility & Authority Levels

Process	Responsible Persons	Activity

Step Three: Food Packaging Safety Management System

The SQF Food Packaging Safety Management System Package contains comprehensive top level Food Packaging Safety Management System Elements procedure templates that form the foundations of your Food Packaging Safety Management System so you don't have to spend 1,000's of hours writing compliant procedures:
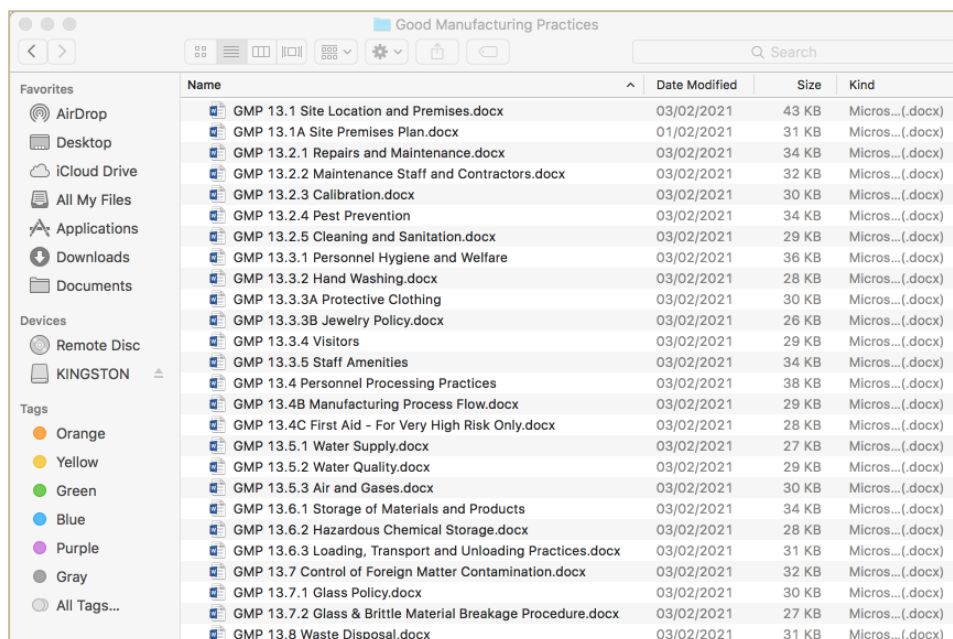
Food Packaging Safety Management System Procedures

FS 2.1 Management Commitment
FS 2.1.1.1 Food Safety Policy
FS 2.1.1.1A Appendix Food Safety Objectives
FS 2.1.1.2 Food Safety Culture
FS 2.1.1.2A Food Safety Culture Planning Matrix
FS 2.1.1.3 Responsibility and Authority
FS 2.1.1.3A Appendix Organizational Chart
FS 2.1.1.3B Appendix Job Descriptions
FS 2.1.2 Management Review
FS 2.1.2R Management Review Record
FS 2.1.3 Complaint Management
FS 2.1.3A Annual Complaints Analyzer
FS 2.1.3B Annual Complaints Analyzer Instruction
FS 2.2.1 Food Packaging Safety Management System
FS 2.2.2 Document Control
FS 2.2.3 Record Control
FS 2.3.1 Product Formulation and Realization
FS 2.3.1A Development Supplementary Documents
FS 2.3.2 Specifications
FS 2.3.2A Material Acceptance Record
FS 2.3.3 Contract Manufacturers
FS 2.3.4 Approved Supplier Program
FS 2.4.1 Food Legislation
FS 2.4.2 Good Manufacturing Practices
FS 2.4.3 Food Safety Plans
FS 2.4.3 HACCP Supplement
FS 2.4.4 Product Inspection
FS 2.4.4 Advanced Laboratory Quality Manual
FS 2.4.5 Non-Conforming Materials and Product
FS 2.4.6 Product Rework
FS 2.4.7 Product Release
FS 2.4.8 Environmental Monitoring
FS 2.5.1 Validation and Effectiveness
FS 2.5.2 Verification Activities
FS 2.5.3 Corrective and Preventative Action
FS 2.5.3A Root Cause Analysis
FS 2.5.3B Corrective Action Request
FS 2.5.3C Preventative Action Request
FS 2.5.5 Audits and Inspections Schedule
FS 2.5.5 Internal Audits and Inspections

Step Four: Good Manufacturing Practices Implementation

The SQF Food Packaging Safety Management System Package contains comprehensive editable Good Manufacturing Practice Documents for Module 13: Good Manufacturing for Production of Food Packaging so you don't have to spend 1,000's of hours writing compliant procedures:

GMP 13.1 Site Location and Premises
GMP 13.1A Site Premises Plan
GMP 13.2.1 Repairs and Maintenance
GMP 13.2.2 Maintenance Staff and Contractors
GMP 13.2.3 Calibration
GMP 13.2.4 Pest Prevention
GMP 13.2.5 Cleaning and Sanitation
GMP 13.3.1 Personnel Hygiene and Welfare
GMP 13.3.2 Hand Washing
GMP 13.3.3A Protective Clothing
GMP 13.3.3B Jewelry Policy
GMP 13.3.4 Visitors
GMP 13.3.5 Staff Amenities
GMP 13.4 Personnel Processing Practices
GMP 13.4B Manufacturing Process Flow
GMP 13.5.1 Water Supply
GMP 13.5.2 Water Quality
GMP 13.5.3 Air and Gases
GMP 13.6.1 Storage of Materials and Products
GMP 13.6.2 Hazardous Chemical Storage
GMP 13.6.3 Loading, Transport and Unloading Practices
GMP 13.7 Control of Foreign Matter Contamination
GMP 13.7.1 Glass Policy
GMP 13.7.2 Glass & Brittle Material Breakage Procedure
GMP 13.8 Waste Disposal

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Step Five: Project SQF Implementation

The package contains project tools to assist in achieving SQF certification. In this part of the package you will need to:

- ✓ Make sure that the Steering Group are established and briefed
- ✓ Make sure that the Steering Group take control of the Project Plan established by Senior Management

Food Packaging Safety Management System Steering Group			
FSMS Team Member	**Name**	**Position**	**Qualification**

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SQF Code Food Safety Management System Implementation Workbook

Project Plan

The Steering Group use the Excel Project Plan developed by Senior Management as a step by step guide to implementing the Food Safety Management System.
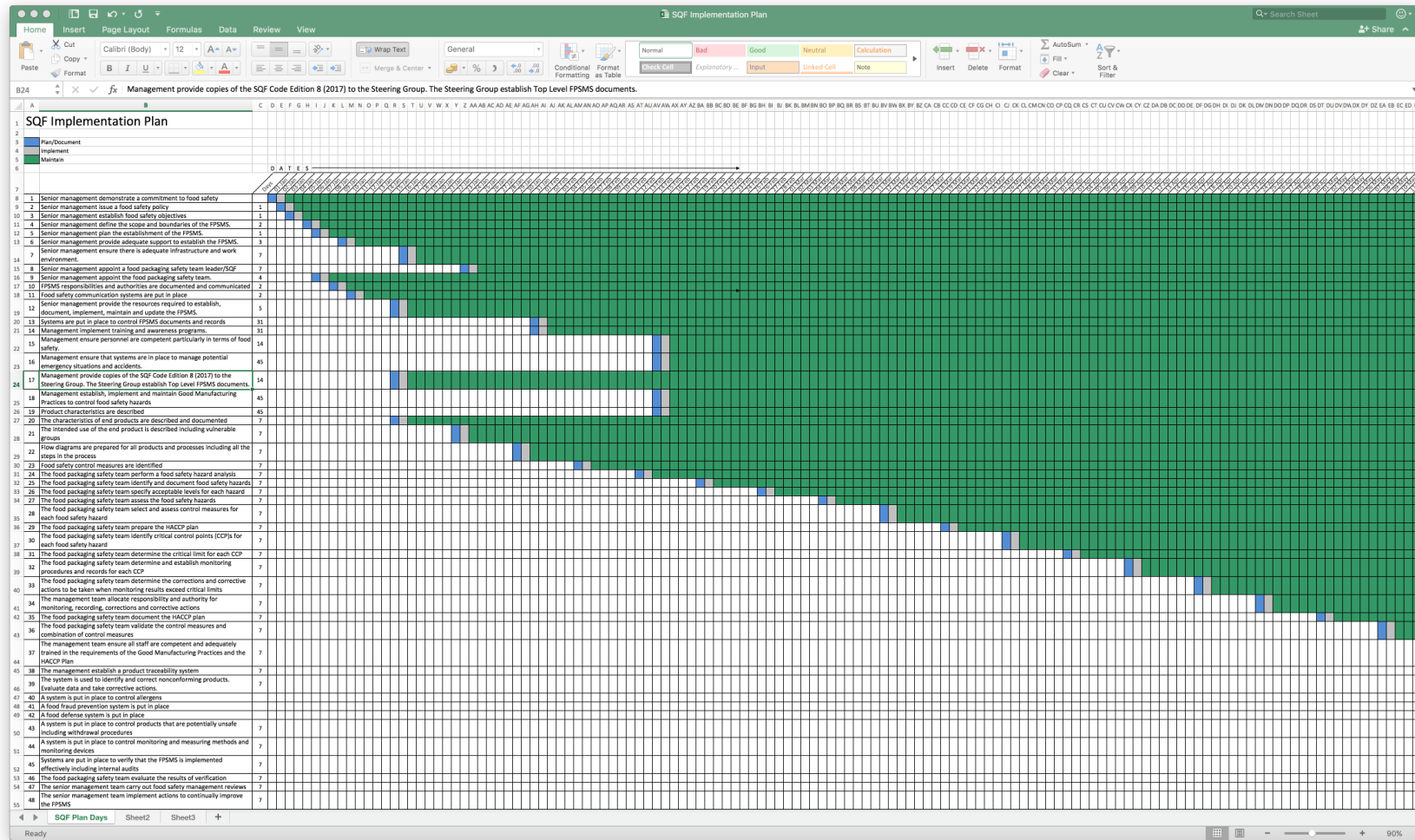
SQF Code Food Safety Management System Implementation Workbook

	Project Planning Tasks	Responsibility	Comments	Due Date for Completion	Date Completed
1)	Senior management demonstrate a commitment to food safety	Senior Management Team	Completed in Step 2		
2)	Senior management issue a food safety policy and objectives	Senior Management Team	Completed in Step 2		
3)	Senior management plan to establish a food safety culture	Senior Management Team	Completed in Step 2		
4)	Senior management define the scope and boundaries of the FPSMS.	Senior Management Team	Completed in Step 2		
5)	Senior management plan the establishment of the FPSMS.	Senior Management Team	Completed in Step 2		
6)	Senior management provide adequate support to establish the FPSMS.	Senior Management Team	Completed in Step 2		
7)	Senior management ensure there is adequate infrastructure and work environment.	Senior Management Team	Completed in Step 2		
8)	Senior management appoint a food packaging safety team leader/SQF Practitioner	Senior Management Team	Completed in Step 2		
9)	Senior management appoint the food packaging safety team.	Senior Management Team	Completed in Step 2		
10)	FPSMS responsibilities and authorities are documented and communicated	Senior Management Team	Completed in Step 2		
11)	Food safety communication systems are put in place	Senior Management Team	Completed in Step 2		
12)	Senior management provide the resources required to establish, document, implement, maintain and update the FPSMS.	Senior Management Team	Completed in Step 2		
13)	Systems are put in place to control FPSMS documents and records	Steering Group	Use FS 2.2.2 Document Control & FS 2.2.3 Record		

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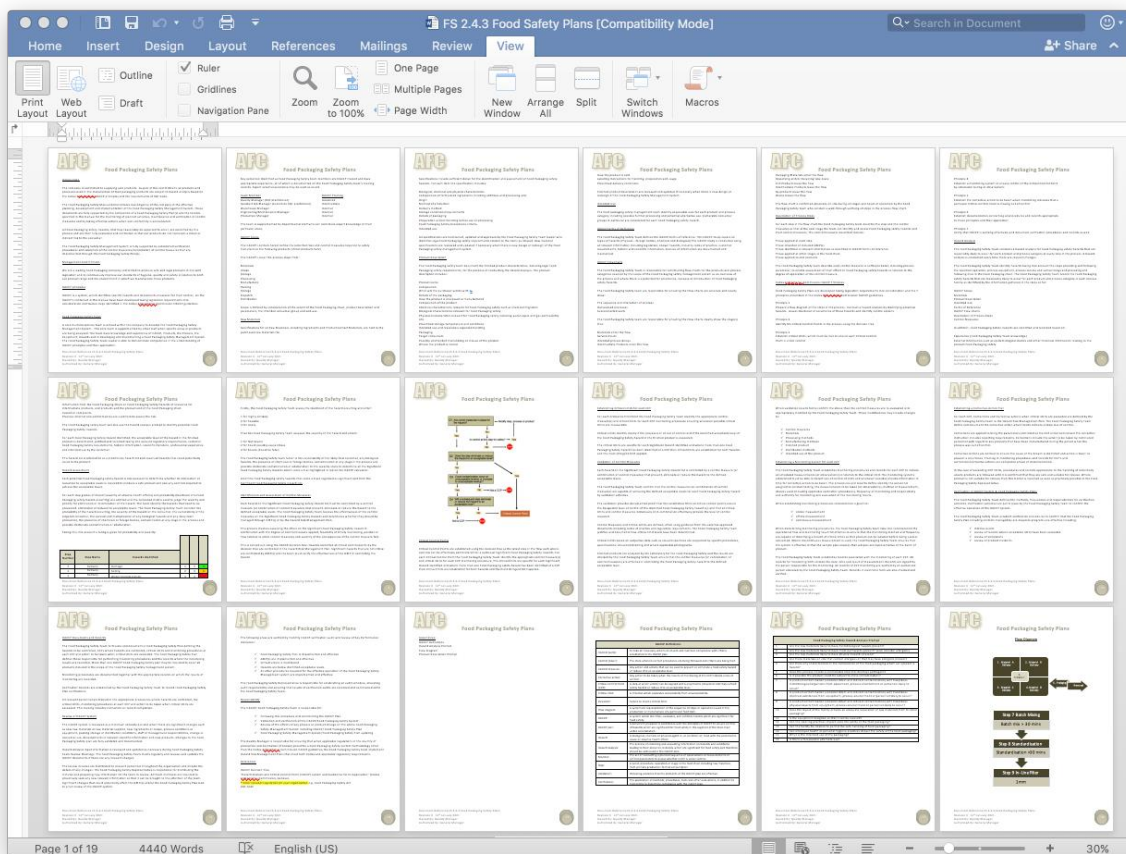
Project Tasks 19 – 36

Project Tasks 19 – 36 are to be completed by the Food Packaging Safety Team. Guidelines for these tasks are included in Step 6 HACCP Implementation Section.

19)	Product characteristics are described
20)	The characteristics of end products are described and documented
21)	The intended use of the end product is described including vulnerable groups
22)	Flow diagrams are prepared for all products and processes including all the steps in the process
23)	Food safety control measures are identified
24)	The food packaging safety team perform a food safety hazard analysis
25)	The food packaging safety team identify and document food safety hazards
26)	The food packaging safety team specify acceptable levels for each hazard
27)	The food packaging safety team assess the food safety hazards
28)	The food packaging safety team select and assess control measures for each food safety hazard
29)	The food packaging safety team prepare the HACCP plan
30)	The food packaging safety team identify critical control points (CCP)s for each food safety hazard
31)	The food packaging safety team determine the critical limit for each CCP
32)	The food packaging safety team determine and establish monitoring procedures and records for each CCP
33)	The food packaging safety team determine the corrections and corrective actions to be taken when monitoring results exceed critical limits
34)	The management team allocate responsibility and authority for monitoring, recording, corrections and corrective actions
35)	The food packaging safety team document the Food Safety (HACCP) Plan
36)	The food packaging safety team validate the control measures and combination of control measures

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Step Six: HACCP Implementation Guide

Included in the package is the document FS 2.4.3 Food Safety Plans and supplementary HACCP documents in the FS 2.4.3 HACCP Supplement Folder including the Packaging Food Safety Planner and Instructions:

Follow the step by step guide to implementing your HACCP using the document supplied and the Packaging Food Safety Planner and Instructions:

The steps in the process should be logged:

The flow diagram should be confirmed physically on site by the Food Packaging Safety team who should conduct a walk through verifying all steps in the process flow chart.

Task 23 Description of Process Steps

For each step in the flow chart the Food Packaging Safety team describe the step and the control measures so that at the next stage the team can identify and assess Food Packaging safety hazards and their control measures. The control measures described include:

Those applied at each step
Those intended or included GMP(s)
Those identified in relevant information as described in HACCP terms of reference
Those applied at other stages in the food chain
Those applied to end products

The Food Packaging Safety team describe each control measure in sufficient detail, including process parameter, to enable assessment of their effect on Food Packaging safety hazards in relation to the degree of application of the control measure.

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Task 24 The food packaging safety team perform a food safety hazard analysis
Task 25 The food packaging safety team identify and document food safety hazards

Hazard Analysis

The Food Packaging Safety Team conducts a hazard analysis for Food Packaging safety hazards that are reasonably likely to occur for each product and process category at every step in the process. A hazard analysis is conducted every time there are relevant changes.

The Food Packaging Safety Team identify hazards taking into account the steps preceding and following the specified operation, process equipment, process service and surroundings and preceding and following links in the Food Packaging chain. The Food Packaging Safety Team record the Food Packaging safety hazards that are reasonably likely to occur for each product and process category in each process facility as identified by the information gathered in the steps so far:

HACCP Scope
Materials
Product Description
Intended Use
Terms of Reference
HACCP Flow charts
Description of Process Steps
Control Measures

In addition, Food Packaging Safety Hazards are identified and recorded based on:

Experience (Food Packaging Safety Team knowledge)
External Information such as epidemiological studies and other historical information relating to the product Food Packaging safety
Information from the Food Packaging Chain on Food Packaging Safety Hazards of relevance for intermediate products, end products and the product end of the Food Packaging chain
Customer complaints
Previous internal non-conformances are used to help assess the risk.

The Food Packaging safety team will also use the hazard analysis prompt to identify potential Food Packaging safety hazards

For each Food Packaging Safety Hazard Identified, the acceptable level of the hazard in the finished product is determined, justified and recorded taking into account regulatory requirements, customer Food Packaging safety requirements, historic information, scientific literature, professional experience and intended use by the customer.

This hazard list is referred to as a preliminary hazard list and covers all hazards that could potentially occur in the product.

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Hazard Assessment

Each potential Food Packaging safety hazard is risk assessed to determine whether its elimination or reduction to acceptable levels is required to produce a safe product and also any controls required to achieve the acceptable levels.

For each step grades of impact (severity of adverse health effects) and probability (likelihood of a Food Packaging safety hazard occurring) are allotted and the combined matrix used to judge the severity and priority for elimination or minimization of the hazard. The team identify the hazards that need to be prevented, eliminated or reduced to acceptable levels. The HACCP team consider the probability of the hazard occurring, the severity of the hazard on the consumer, the vulnerability of the targeted consumer, the survival and multiplication of any biological hazards and any likely toxin production, the presence of chemicals or foreign bodies, contamination at any stage in the process and possible deliberate contamination or adulteration.

Taking this into account a rating is given for probability and severity:

Step Number	Step Name	Hazards Identified	Probability	Severity	Significance
1	Delivery	Damage	1	3	3
1	Delivery	Soiling	2	3	6
1	Delivery	Water Contamination	3	3	9

Firstly, the Food Packaging Safety Team assess the likelihood of the hazard occurring and enter:

1 for Highly Unlikely
2 for Possible
3 for Likely

Then the Food Packaging Safety Team assesses the severity of the hazard and enters:

1 for Not Severe
2 for Could possibly cause illness
3 for Severe (Could be fatal)

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The Food Packaging Safety team factor in the vulnerability of the likely final customer, any biological hazards, the presence of chemicals or foreign bodies, contamination at any stage in the process and possible deliberate contamination or adulteration to the severity score to determine all the Significant Food Packaging Safety Hazards which score a 9 as highlighted in red on the HACCP calculator.

All of the Food Packaging safety hazards that score a 9 are regarded as significant and form the Significant Food Packaging Safety Hazard List.

The Packaging Food Safety Planner and Instructions can be used to help in this process:

Packaging Food Safety Planner — HACCP Calculator

Hazards that are not significant are controlled by GMPs
Hazards that have significant risk but not CCPs should be controlled by GMPs and controls verified
CCP's are controlled in the HACCP plan

Decision Tree:
- = Not a CCP
- N = Check
- = CCP

Step Number	Step Name	Hazards Identified	P	S	S	Control Measure	Q1	Q2	Q3	Q4	Critical Limits	Monitoring Procedures	Corrective Action	HACCP Record
		Glass and brittle plastics	1	3	3	Minimize glass in the factory and audit. Ensure glass breakage action and investigation systems are in place					Glass Policy and Breakage Procedures in Place	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Blades	3	3	9	System for safe issue, return and disposal of blades. Ensure blade loss/damage action and investigation systems are in place	N				Blade Policy and Breakage Procedures in Place	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Pests	2	2	4	Ensure pest control systems are in place					No infestation Pest control procedures in place	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
1	Analysed in the table are the generic contamination hazards that may be present throughout the manufacturing process. The hazards detailed are not process specific and are controlled by essential factory wide procedures.	Microbiological	3	3	9	Clearly communicate personal hygiene rules and ensure hygienic conditions are monitored by audits	Y	N	Y	Y	Hygiene Policy in place and procedures being followed	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Dust and dirt	3	2	6	Ensure all cleaning requirements are specified and are carried out as scheduled					Clean - Cleaning procedures in place	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Wood splinters	2	3	6	Exclude wood from production areas					Wood excluded from production areas	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Hairs	3	1	3	Ensure hairnets and beard snoods are worn					Hairnets and snoods being worn correctly	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Blood	2	3	6	Ensure accidents are reported immediately and cuts are suitably protected					Accidents reported and approved first aid dressings being used	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Foodstuffs	3	1	3	Restrict food and drink to designated areas outside of production					No food in production areas	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Jewelry and personal items	2	3	6	Restrict wearing of jewelry and bringing of personal items into production areas					Jewelry policy enforced	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
		Insects	2	3	6	Ensure pest control systems are in place					Doors kept shut EFKs working	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
2	Raw material source / receipt	Raw material not approved for direct food contact	2	3	6	Ensure that all raw material is purchased approved for 'direct food contact' and the supplier provides all relevant specifications and certification					Delivery must be from an approved supplier and supplied with certificate of conformity	Good in Inspection	Reject if supplier is not approved or place on hold if there is no C of C	QMR 032 Goods In Inspection Record
		Generic contamination caused by poor handling and hygiene controls at suppliers	2	3	6	Only purchase raw material from approved suppliers who can demonstrate the required level of hygiene controls. Approval Questionnaire and auditing					Delivery must be from an approved supplier and free from contamination	Good in Inspection	Reject if supplier is not approved or place on hold if there is no C of C	QMR 032 Goods In Inspection Record
		Contaminated deliveries	1	3	3	Ensure that all raw material is inspected for odor, damp or contamination when unpacking and is stored on clean plastic pallets for issue to production. Ensure that all personal hygiene rules are applied					Free from contamination	Good in Inspection	Reject if supplier is not approved or the load is contaminated	QMR 032 Goods In Inspection Record
3	Storage of raw material	Generic contamination caused by poor handling and hygiene controls in Stores	1	3	3	Ensure that all raw material remains in original packaging until issued to production. Ensure that the stores department cleaning schedule is applied and external doors are kept closed when not in use					No contamination - Packaging intact and clean	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
4	Unpacked for production	Generic contamination caused by poor handling and hygiene controls in Production	2	3	6	Ensure that all raw material is inspected for issue to production. Ensure that all personal hygiene rules are applied					No contamination - Packaging intact and clean	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist
5	Topping	Off-cuts	3	3	9	Ensure Inverter air pressure is > 1 bar	Y	N	Y	N	No Contamination - Air pressure > 1 bar	Hourly checks on air pressure	Stop line and call an engineer. Quarantine all product manufactured since last check.	QMR 003 Product Realization Record

Tabs: Process Flow Entry | Hazard List & Control Measures | **Food Safety Planner** | +

Task 28 The food packaging safety team select and assess control measures for each food packaging safety hazard

Identification and Assessment of Control Measures

Each hazard on the Significant Food Packaging Safety Hazard list must be controlled by a control measure (or combination of control measures) that prevent, eliminate or reduce the hazard to the defined acceptable levels. The Food Packaging Safety Team reviews the effectiveness of the control measures on the Significant Food Packaging Safety Hazards and determines whether they should be managed through GMP(s) or by the HACCP Plan.

This process involves assessing the effect on the Significant Food Packaging Safety Hazard in combination with the degree of control measure applied, feasibility of timely monitoring, position in flow relative to other control measures and severity of the consequences if the control measure fails.

This is carried out using the HACCP decision tree. Hazards identified at critical control points by the decision tree are controlled in the HACCP plan. Significant hazards that are not critical are controlled by GMP(s) and the team must verify the effectiveness of the GMP in controlling the hazard.

This is carried out using the HACCP decision tree. Hazards identified at critical control points by the decision tree are controlled in the HACCP plan.
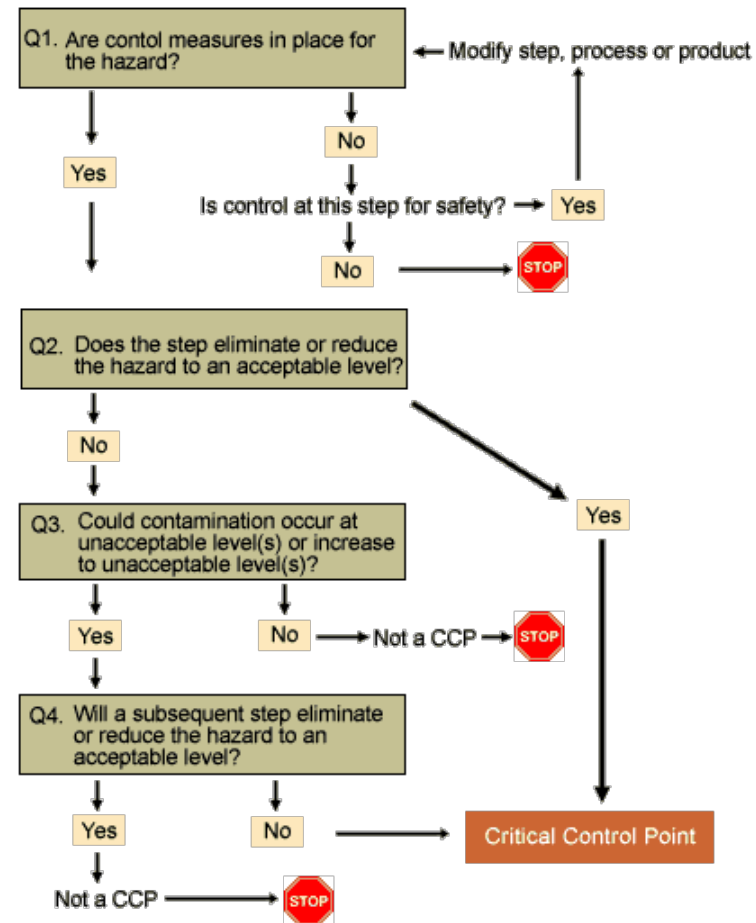
Task 35 The food packaging safety team document the HACCP plan

The Food Packaging Safety Team should complete the relevant columns in the Packaging Food Safety Planner Sheet:

Critical Limits	Monitoring Procedures	Corrective Action	Responsibility	HACCP Record
Minimum / Maximum acceptable levels to ensure condition is in control	- measurements to be taken (or observations) method of measurement - devices used (including applicable calibration procedures) - frequency of monitoring - responsibility and authority for monitoring and evaluation of the monitoring results	Action to be taken when outside of critical limits to regain control and ensure unsafe product is controlled	Who is taking the action	Where is it recorded

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Control Measure Validation

Metal Detection Validation

Product Category	Freshly Prepared Sandwich Packaging	
Step Number	8 Packing	
Hazard	Presence of metal objects	
Control Measure	Metal Detection to a maximum sensitivity of 5mm Ferrous and Non-ferrous	

Validation Methods	Applicable		Applicable
	Yes	No	
Third Party Scientific Validation		✓	
Historical Knowledge	✓		History indicates a significant reduction in risk by using a metal detector
Simulated Production Conditions		✓	
Collection of Data in normal production		✓	
Admissible in industrial practices	✓		Industry Code of Practice recommendation
Legislation		✓	
Mathematical Modelling		✓	
Conclusion			
Internal Validation Required?		✓	
If so by which method?			
CCP Confirmed	✓		
Authorized by(Name):			
Signature:			

Document Reference Metal Detection Validation
Revision 0   4th February 2021
Owned by: Quality Manager
Authorized By: General Manager

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The Food Packaging Safety Team should be informed in a timely manner of changes including the following:

- ✓ products or new products
- ✓ raw materials, ingredients and services
- ✓ production systems and equipment
- ✓ production premises, location of equipment, surrounding environment
- ✓ cleaning and sanitation programs;
- ✓ packaging, storage and distribution systems
- ✓ personnel qualification levels and/or allocation of responsibilities and authorizations
- ✓ statutory and regulatory requirements
- ✓ knowledge regarding food safety hazards and control measures
- ✓ customer, sector and other requirements that the organization observes
- ✓ relevant enquiries from external interested parties
- ✓ complaints indicating food safety hazards associated with the product
- ✓ other conditions that have an impact on food safety.

At this stage, you will now be able to complete Tasks 38 – 44 using the document templates provided:

Task 38: The management establish a product traceability system
QM 2.6.2 Product Traceability

Task 39: The system is used to identify and correct nonconforming products. Evaluate data and take corrective actions.
FS 2.4.5 Non-Conforming Materials and Product & FS 2.5.3 Corrective and Preventative Action

Task 40: A system is put in place to control allergens
FS 2.8.1 Allergen Management

Task 41: A food fraud prevention system is put in place
FS 2.7.2 Food Fraud

Task 42:   A food defense system is put in place
FS 2.7.1 Food Defense Plan

Task 43: A system is put in place to control products that are potentially unsafe including withdrawal procedures
FS 2.6.3 Product Withdrawal and Recall

Task 44: A system is put in place to control monitoring and measuring methods and monitoring devices
GMP 13.2.3 Calibration

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Step Seven: Training

A significant part of the implementation process is training. Job Descriptions should be available for all staff and they should be briefed and aware of their food safety responsibilities. A training matrix and plans should be drawn up for all staff and the relevant training given based on responsibility and authority.

We have provided a Staff Training Matrix Template in Microsoft Excel Format.

For each employee and individual training record should be completed. QMR 002 Training Record is provided in the documentation pack as a template:

Basic SQF Code Training should be given to all staff and also include:

- ✓ Job/Task Performance
- ✓ Company Safety and Quality Policies and Procedures
- ✓ Good Manufacturing Practices
- ✓ Cleaning and Sanitation procedures
- ✓ HACCP
- ✓ Bio security and Food Defense
- ✓ Product Quality and Grading
- ✓ Chemical Control
- ✓ Hazard Communication
- ✓ Blood borne Pathogen
- ✓ Emergency Preparedness
- ✓ Employee Safety
- ✓ Safety Regulatory Requirements/Quality Regulatory Requirements

The Food Safety Team should receive extra training:

- ✓ Internal Audit Training (Conducted in Step Seven)
- ✓ HACCP Training

Remember all food packaging handlers should receive Basic Food Hygiene Training

HACCP Training

An illustrated PowerPoint HACCP training presentation is supplied to train your food safety team in Hazard analysis and the principles of HACCP.

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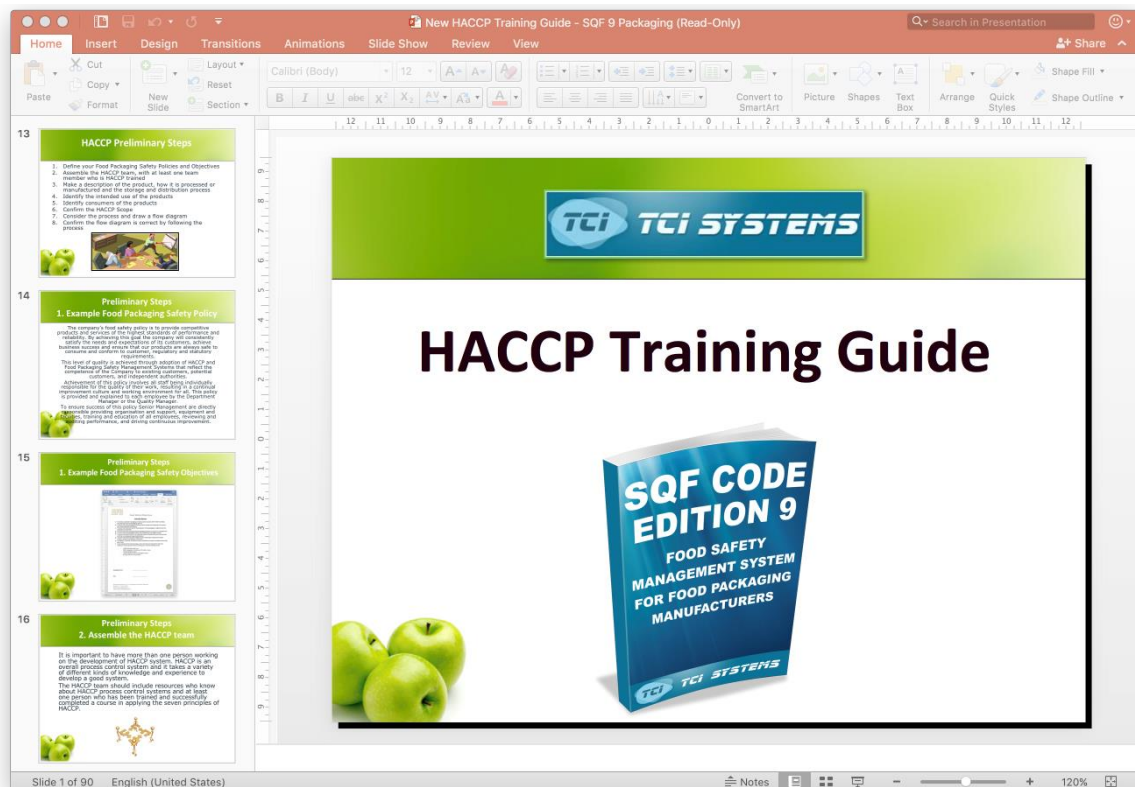
Stage Eight: Final Steps to SQF Certification

There a few final steps to achieving SQF Certification:

- ✓ <u>Verify that the FPSMS is implemented effectively including internal audits</u>
- ✓ <u>Evaluate the results of verification activities</u>
- ✓ Carry out Management Reviews
- ✓ Carry out an assessment of your system to make sure that it meets the requirements of the SQF Code and have the appropriate Good Manufacturing using the <u>SQF System Self-Assessment Checklists for Suppliers</u>
- ✓ Ensure any areas requiring corrective action are addressed
- ✓ Choose your Certification Body
- ✓ Agree a Contract with a Certification Body
- ✓ Pre-audit Document Review
- ✓ On-Site Audit
- ✓ Audit Review
- ✓ Certification Body Review
- ✓ Celebrate!
- ✓ Communicate your success!

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Senior Management Review Meeting Notification

Date

Time

Venue

Agenda

1) Review of the Food Safety Policy
2) Review of the Food Safety Objectives
3) Review of Management Changes
4) Minutes and Follow-up actions from previous management review meeting
5) Review of changes to food safety management system documentation including policies, procedures, specifications, food safety plan(s)
6) Hazard and risk management system review
7) Food Safety Culture performance review
8) Results and Outstanding Non-conformances from internal and external audits
9) Review and trend analysis of Customer and Supplier complaints
10) Analysis of the results of validation and verification activities
11) Key Performance Indicators Review
12) Emergencies and Accidents
13) Process and product conformity
14) Corrective and preventive action status
15) Food Safety incidents including allergen control and labelling non-conformances, recalls, withdrawals, safety or legal issues
16) Review of changes to legislation and food safety related scientific information
17) Review of Resources and effectiveness of Training
18) Recommended Improvements
19) Customer feedback and Sales levels are reviewed to give an indication of trends
20) A.O.B

Attendees:

Senior Management Team		
Job Title	**Name**	**Role in Team**
General Manager		Chairman
Operations Manager		Operations Reporting
General Manager		Site Performance Reporting
Quality Manager		Food Packaging Safety Reporting SQF Practitioner
Planning Manager		Planning and Capacity Reporting
Distribution Manager		Distribution Reporting
Maintenance Manager		Services and Engineering Provision
Finance Manager		Financial Reporting
Human Resources Manager		Resource reporting

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Use the SQF Code Self-Assessment Checklists to assess your Food Safety Management System

We recommend that the SQF Practitioner carries out a pre-certification audit to ensure that you are satisfied that your food safety management system meets the requirements of the SQF Code. The SQF Practitioner should read the relevant section of the SQF Code and assess if you are compliant, making notes on the checklist.

Ensure any areas requiring corrective action are addressed

The non-compliances identified in the final self-assessment of compliance with the SQF Code should be logged by the Food Packaging Safety Team Leader and the appropriate corrective action allocated and taken:

Date	SQF Code Section	Details of Non-Conformance	Identified by:	Corrective Action Required	Responsibility	Target completion Date	Date Completed

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