**SALSA TO BRCGS *START!***

**TRANSITION CHECKLIST**

SALSA TO START! Auditor Checklist and Site Self-Assessment Tool

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| **1** | **Senior management commitment** |
| 1.1 | Senior management commitment and continual improvement |
| **Fundamental** **SOI**  | The site’s senior management shall demonstrate they are fully committed to the implementation of the requirements of the START programme and to processes which facilitate continual improvement of food safety and quality management |
| **Clause** | **Requirements** | **Conforms** | **Comments** |
| **1.1.1** | The site shall have a documented policy which states the site’s intention to meet its obligation to produce safe, legal and authentic products to the specified quality, and its responsibility to its customers. This shall be:* signed by the person with overall responsibility for the site
* communicated to all staff.
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| **1.1.7** |  | The company’s senior management shall provide the human and financial resources required to produce food safely and in compliance with the requirements of this Standard. |  |  |
| **1.1.8** | The company’s senior management shall have a system in place to ensure that the site is kept informed of and reviews:* scientific and technical developments
* industry codes of practice
* new risks to authenticity of raw materials
* all relevant legislation in the country where the product will be sold (where known).
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| 1.2 | Organisational structure, responsibilities and management authority |
| **SOI** | The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality. |
| **Clause**  | **Requirements** | **Conforms** |  |
| **1.2.1** | The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure food safety, integrity, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person. |  |  |
| **2** | The food safety plan – HACCP |
| **Fundamental** **SOI** | The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP principles. |
| 2.1 | The HACCP Food Safety team (equivalent to codex Alimentarius Step 1) |
| **Clause** | **Requirements** | **Conforms** |  |
| **2.3** | Describe the product (equivalent to Codex Alimentarius Step 2) |
| **Clause** | **Requirements** | **Conforms** |  |
| **2.3.1** | A full description for each product or group of products shall be developed, which includes all relevant information on food safety. As a guide, this may include the following, although this is not an exhaustive list:* composition (e.g. raw materials, ingredients, allergens, recipe)
* origin of ingredients
* physical or chemical properties that impact food safety (e.g. pH, aw)
* treatment and processing (e.g. cooking, cooling)
* packaging system (e.g. modified atmosphere, vacuum)
* storage and distribution conditions (e.g. chilled, ambient)
* maximum safe shelf life under prescribed storage and usage conditions.
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| **2.5** | Construct a process flow diagram (equivalent to Codex Alimentarius Step 4) |
| **Clause** | **Requirements** | **Conforms** |  |
| **2.5.1** |  | 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 or food safety plan 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
* potential for process delay
* rework and recycling
* low-risk/high-risk/high-care area segregation

finished products, intermediate/semi-processed products, by-products and waste. |  |  |
| **2.7** | List all potential hazards associated with each process step, conduct a hazard analysis and consider any measures to control identified hazards (equivalent to Codex Alimentarius Step 6, Principle 1) |
| **Clause**  | **Requirements** | **Conforms** |  |
| **2.7.2** | The HACCP food safety team shall conduct a hazard analysis to identify hazards which need to be prevented, eliminated or reduced to acceptable levels. Consideration shall be given to the following:* likely occurrence of hazard
* severity of the effects on consumer safety
* vulnerability of those exposed
* survival and multiplication of micro-organisms of specific concern to the product
* presence or production of toxins, chemicals or foreign bodies
* contamination of raw materials, intermediate/semi-processed product, or finished product.

Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented. |  |  |
| **2.7.3** | The HACCP food safety team shall consider the control measures necessary to prevent or eliminate a food safety hazard or reduce it to an acceptable level. Where the control is achieved through existing prerequisite programmes, this shall be stated and the adequacy of the programme to control the specific hazard validated. Consideration may be given to using more than one control measure. |  |  |
| **2.9** | Establish critical limits for each CCP (equivalent to Codes Alimentarius Step 8, Principle 3) |
| **Clause**  | **Requirements** | **Conforms** |  |
| **2.9.2** | The HACCP food safety team shall validate each CCP. Documented evidence shall show that the control measures selected and critical limits identified are capable of consistently controlling the hazard to the specified acceptable level. |  |  |
| **2.10** | Establish a monitoring system for each CCP (equivalent to Codex Alimentarius Step 9, Principle 4) |
| **Clause**  | **Requirements** | **Conforms** |  |
| **2.10.1** |  | A monitoring procedure shall be established for each CCP to ensure compliance with critical limits. The monitoring system shall be able to detect loss of control of CCPs and, wherever possible, provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list:* online measurement
* offline measurement
* continuous measurement (e.g. thermographs, pH meters etc.).

Where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product. |  |  |

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| **3** | **Food safety and quality management system** |
| 3.1 | Food safety and quality manual |
| **SOI** | The company’s processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe product. |
| **Clause**  | **Requirements** | **Conforms** |  |
| **3.1.2** | The food safety and quality manual shall be fully implemented and the manual or relevant components shall be readily available to relevant staff. |  |  |
| **3.1.3** |  | All procedures and work instructions shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. This shall include the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (e.g. there are issues of literacy or foreign language). |  |  |
| **3.2** | Document control |
| **SOI** | The company shall operate an effective document control system to ensure that only the correct versions of documents, including recording forms, are available and in use. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.2.1** | 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.

Where documents are stored in electronic form these shall also be:* stored securely (e.g. with authorised access, control of amendments, or password protected)
* backed up to prevent loss.
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| **3.3** | Record completion and maintenance |
| **SOI** | The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.3.1** | Records shall be legible, maintained in good condition and retrievable. Any alterations to records shall be authorised and justification for the alteration shall be recorded. Where records are in electronic form these shall also be:* stored securely (e.g. with authorised access, control of amendments, or password protected)
* suitably backed up to prevent loss.
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| **3.4** | **Internal audits** |
| **Fundamental****SOI** | The company shall be able to demonstrate that it verifies the effective application of the food safety plan and the implementation of the requirements of the Global Standard for Food Safety. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.4.4** | In addition to the internal audit programme, there shall be a separate programme of documented inspections to ensure that the factory environment and processing equipment are maintained in a suitable condition for food production. At a minimum, these inspections shall include:* hygiene inspections to assess cleaning and housekeeping performance
* fabrication inspections to identify risks to the product from the building or equipment.

The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas. |  |  |
| **3.5** | **Supplier and raw material approval and performance monitoring** |
| **3.5.1** | Management of suppliers of raw materials and packaging |
| **Fundamental****SOI** | The company shall have an effective supplier approval and monitoring system to ensure that any potential risks from raw materials (including primary packaging) to the safety, authenticity, legality and quality of the final product are understood and managed. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.5.1.2** |  | The company shall have a documented supplier approval procedure to ensure that all suppliers of raw materials, including primary packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval procedure shall be based on risk and include either one or a combination of:* a valid certification to the applicable BRCGS Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased
* 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. Where the supplier audit is completed by a second or third party, the company shall be able to:
* demonstrate the competency of the auditor
* confirm that the scope of the audit includes product safety, traceability, HACCP review and good manufacturing practices
* obtain and review a copy of the full audit report

**or*** where a valid risk-based justification is provided and the supplier is assessed as low risk only, a completed supplier questionnaire may be used for initial approval. The questionnaire shall have a scope that includes product safety, traceability, HACCP review and good manufacturing practices, and it shall have been reviewed and verified by a demonstrably competent person.
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| **3.5.2** | Raw material and packaging acceptance, monitoring and management procedures |
| **SOI** | Controls on the acceptance of raw materials (including primary packaging) shall ensure that these do not compromise the safety, legality or quality of products and where appropriate any claims of authenticity. |
| **3.5.2.1** |  | The company shall have a procedure for the acceptance of raw materials and primary packaging on receipt based upon the risk assessment (clause 3.5.1.1). Acceptance of raw materials (including primary packaging) and their release for use shall be based on either one or a combination of:* product sampling and testing
* visual inspection on receipt
* certificates of analysis (specific to the consignment)
* certificates of conformance.

A list of raw materials (including primary packaging) and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined, implemented and reviewed. |  |  |
| **3.5.4** | Management of outsourced processing |
| **SOI** | Where any process step in the manufacture of a product is outsourced to a third party or undertaken at another site, this shall be managed to ensure it does not compromise the safety, legality, quality or authenticity of the product. |
| **Clause** | **Requirements** | **Conforms** |  |
| 3.5.4.1 | The company shall be able to demonstrate that, where part of the production process or any part of the final packing is outsourced and undertaken off-site, this has been declared to the brand owner and, where required, approval granted. |  |  |
| 3.5.4.3 | Any outsourced processing operations shall:* be undertaken in accordance with established contracts which clearly define any processing and/or packing requirements and product specification
* maintain product traceability.
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| **3.6** | Specifications |
| **SOI** | Specifications shall exist for raw materials (including primary packaging), finished products and any product or service which could affect the integrity of the finished product. |
| **Clause** | **Requirements** | **Conforms** |  |
| 3.6.1 | Specifications for raw materials and primary packaging shall be adequate and accurate and ensure compliance with relevant safety and legislative requirements. The specifications shall include defined limits for relevant attributes of the material which may affect the quality or safety of the final products (e.g. chemical, microbiological or physical standards). |  |  |
| 3.6.3 | Where the company is manufacturing customer-branded products, it shall seek formal agreement of the finished product specifications. Where specifications are not formally agreed then the company shall be able to demonstrate that it has taken steps to ensure formal agreement is in place. |  |  |
| **3.7** | Corrective and preventative actions |
| **Fundamental****SOI** | The site shall be able to demonstrate that it uses the information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence. |
| **Clause** |  **Requirements** | **Conforms** |  |
| 3.7.2 |  | Where a non-conformity places the safety, legality or quality of products at risk, this shall be investigated and recorded including:* clear documentation of the non-conformity
* assessment of consequences by a suitably competent and authorised person
* the action to address the immediate issue
* an appropriate timescale for correction
* the person responsible for correction
* verification that the correction has been implemented and is effective.
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| **3.8** | Control of non-conforming product |
| **SOI** | The site shall ensure that any out-of-specification product is effectively managed to prevent unauthorised release. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.8.1** |  | There shall be procedures for managing non-conforming products. These procedures shall include:* the requirement for staff to identify and report a potentially non-conforming product
* clear identification of a non-conforming product (e.g. direct labelling or the use of IT systems)
* secure storage to prevent accidental release (e.g. physical or computer-based isolation)
* referral to the brand owner where required
* defined responsibilities for decision-making on the use or disposal of products appropriate to the issue (e.g. destruction, reworking, downgrading to an alternative label or acceptance by concession)
* records of the decision on the use or disposal of the product
* records of destruction where a product is destroyed for food safety reasons.
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| **3.9** | Traceability |
| **Fundamental****SOI** | The site shall be able to trace all raw material product lots (including primary packaging) from its suppliers through all stages of processing and dispatch to its customers and vice versa. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.9.4** |  | Where rework or any reworking operation is performed, traceability shall be maintained. |  |  |
| **3.10** | Complaint-handling |
| **SOI** | Customer complaints shall be handled effectively and information used to reduce recurring complaint levels. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.10.2** | Complaint data shall be analysed for significant trends. Where there has been a significant increase in a complaint or a serious complaint, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff. |  |  |
| **3.11** | Management of incidents, product withdrawal and product recall |
| **SOI** | The company shall have a plan and system in place to manage incidents effectively and enable the withdrawal and recall of products should this be required. |
| **Clause** | **Requirements** | **Conforms** |  |
| **3.11.1** | The company shall have procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality. This shall include consideration of contingency plans to maintain product safety, quality and legality. Incidents may include:* disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications
* events such as fire, flood or natural disaster
* malicious contamination or sabotage
* failure of, or attacks against, digital cyber-security.

Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products. |  |  |
| **4** | **Site standards** |
| **4.2** | Site Security and Food Defence |
| **SOI** | Systems shall protect products, premises and brands from malicious actions while under the control of the site. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.2.1** |  | The company shall undertake a documented risk assessment (threat assessment) of the potential risks to products from any deliberate attempt to inflict contamination or damage. This threat assessment shall include both internal and external threats.The output from this assessment shall be a documented threat assessment plan. This plan shall be kept under review to reflect changing circumstances and market intelligence. It shall be formally reviewed at least annually and whenever:* a new risk emerges (e.g. a new threat is publicised or identified)
* an incident occurs, where product security or food defence is implicated.
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| **4.2.3** | Areas where a significant risk is identified shall be defined, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging).Policies and systems shall be in place to ensure that only authorised personnel have access to production and storage areas, and that access to the site by employees, contractors and visitors is controlled. A visitor recording system shall be in place.Staff shall be trained in site security procedures and food defence. |  |  |
| **4.3** | Layout, product flow and segregation |
| **Fundamental****SOI** | The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with relevant legislation. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.3.4** |  | Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe hygienic conditions. |  |  |
| **4.5** | Utilities – water, ice, air and other gases |
| **SOI** | Utilities used within the production and storage areas shall be monitored to effectively control the risk of product contamination. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.5.1** | All water (including ice and steam) used as a raw material in the manufacture of processed food, the preparation of product, hand-washing or for equipment or plant cleaning shall be supplied in sufficient quantity, be potable at point of use or pose no risk of contamination according to applicable legislation. The microbiological and chemical quality of water shall be analysed at least annually. The sampling points, scope of the test and frequency of analysis shall be based on risk, taking into account the source of the water, on-site storage and distribution facilities, previous sample history and usage. |  |  |
| **4.5.3** | Air and other gases used as an ingredient or that are in direct contact with products shall be monitored to ensure this does not represent a contamination risk. Compressed air that is in direct contact with the product shall be filtered at point of use. |  |  |
| **4.7** | Maintenance |
| **SOI** | An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.7.1** | There shall be a documented planned maintenance schedule or condition monitoring system which includes all plant and processing equipment. The maintenance requirements shall be defined when commissioning new equipment. |  |  |
| **4.8** | Staff facilities |
| **SOI** | Staff facilities shall be sufficient to accommodate the required number of personnel, and shall be designed and operated to minimise the risk of product contamination. The facilities shall be maintained in good and clean condition. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.8.1** | Designated changing facilities shall be provided for all personnel, whether staff, visitor or contractor. These shall be sited to allow direct access to the production, packing or storage areas without recourse to any external area. Where this is not possible, a risk assessment shall be carried out and procedures implemented accordingly (e.g. the provision of cleaning facilities for footwear). |  |  |
| **4.9** | Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas |
| **SOI** | Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product. |
| **4.9.2** | Metal control |
| **Clause** |  **Requirements** | **Conforms** |  |
| **4.9.2.2** | The purchase of ingredients and packaging which use staples or other foreign-body hazards as part of the packaging materials shall be avoided.Staples, paper clips and drawing pins shall not be used in open product areas.Where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimise the risk of product contamination. |  |  |
| **4.9.3** | Glass, brittle plastic, ceramics and similar materials |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.9.3.5** | Where they pose a risk to product, bulbs and strip lights (including those on electric fly-killer devices) shall be adequately protected. Where full protection cannot be provided, alternative management such as wire-mesh screens or monitoring procedures shall be in place. |  |  |
| **4.10** | Foreign-body detection and removal equipment |
| **SOI** | The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies |
| **4.10.1** | Selection and operation of foreign-body detection and removal equipment |
| **Clause**  | **Requirements** | **Conforms** |  |
| **4.10.1.1** |  | A documented assessment in association with the HACCP study shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign-body contamination. Typical equipment to be considered may include:* filters
* sieves
* metal detection
* magnets
* optical sorting equipment
* X-ray detection equipment
* other physical separation equipment (e.g. gravity separation, fluid bed technology).
 |  |  |
| **4.10.1.2** |  |  | The type, location and sensitivity of the detection and/or removal method shall be specified as part of the site’s documented system. Industry best practice shall be applied with regard to the nature of the ingredient, material, product and/or the packed product. The location of the equipment or any other factors influencing the sensitivity of the equipment shall be validated and justified. |  |  |
| **4.10.1.3** |  | The site shall ensure that the frequency of the testing of the foreign-body detection and/or removal equipment is defined and takes into consideration:* specific customer requirements
* the site’s ability to identify, hold and prevent the release of any affected materials, should the equipment fail.

The site shall establish and implement corrective action and reporting procedures in the event of a failure of the foreign-body detector and/or removal equipment. Action shall include a combination of isolation, quarantining and re-inspection of all products produced since the last successful test or inspection. |  |  |
| **4.10.1.4** |  |  | Where foreign material is detected or removed by the equipment, the source of any unexpected material shall be investigated. Information on rejected materials shall be used to identify trends and, where possible, instigate preventive action to reduce the occurrence of contamination by the foreign material. |  |  |
| **4.10.2** | Filters and sieves |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.10.2.1** |  | Filters and sieves used for foreign-body control shall be of a specified mesh size or gauge and designed to provide the maximum practical protection for the product. |  |  |
| **4.10.3** | Metal detectors and X-ray equipment |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.10.3.1** |  | Metal detection equipment shall be in place unless risk assessment demonstrates that this does not improve the protection of final products from metal contamination. Where metal detectors are not used justification shall be documented. The absence of metal detection would only normally be based on the use of an alternative, more effective method of protection (e.g. use of X-ray, fine sieves or filtration of products). |  |  |
| **4.10.3.2** |  | The metal detector or X-ray equipment shall incorporate one of the following:* an automatic rejection device, for continuous in-line systems, which shall either divert contaminated product out of the product flow or to a secure unit accessible only to authorised personnel
* a belt stop system with an alarm where the product cannot be automatically rejected (e.g. for very large packs)

in-line detectors which identify the location of the contaminant to allow effective segregation of the affected product. |  |  |
| **4.10.6** | Container cleanliness – glass jars, cans and other rigid containers |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.10.6.1** | Based on risk assessment, procedures shall be implemented to minimise foreign-body contamination originating from the packaging container (e.g. jars, cans and other pre-formed rigid containers). This may include the use of covered conveyors, container inversion and foreign-body removal through rinsing with water or air jets. |  |  |
| **4.11** | Housekeeping and hygiene |
| **Fundamental****SOI** | Housekeeping and cleaning systems shall be in place which ensure appropriate standards of hygiene are maintained at all times and the risk of product contamination is minimised. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.11.4** | The resources for undertaking cleaning shall be available. Where it is necessary to dismantle equipment for cleaning purposes or to enter large equipment for cleaning, this shall be appropriately scheduled and, where necessary, planned for non-production periods. Cleaning staff shall be adequately trained or engineering support provided where access within equipment is required for cleaning. |  |  |
| **4.14** | Pest management |
| **SOI** | The whole site shall have an effective preventive pest management programme in place to minimise the risk of infestation and resources shall be available to respond rapidly to any issues which occur to prevent risk to products.Pest management programmes shall comply with all applicable legislation. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.14.5** | Bait stations or other rodent monitoring or control devices shall be appropriately located and maintained to prevent contamination risk to product. Toxic rodent baits shall not be used within production or storage areas where open product is present except when treating an active infestation. Where toxic baits are used, these shall be secured.Any missing bait stations shall be recorded, reviewed and investigated. |  |  |
| **4.14.8** | In the event of infestation, or evidence of pest activity, immediate action shall be taken to identify at-risk products and to minimise the risk of product contamination. Any potentially affected products should be subject to the non-conforming product procedure. |  |  |
| **4.14.12** |  | Employees shall understand the signs of pest activity and be aware of the need to report any evidence of pest activity to a designated manager. |  |  |
| **4.15** | Storage facilities |
| **SOI** | All facilities used for the storage of raw materials, packaging, in-process products and finished products shall be suitable for purpose. |
| **Clause** | **Requirements** | **Conforms** |  |
| **4.15.3** | Where temperature control is required (e.g. for raw materials, semi-finished materials or final products), the storage area shall be capable of maintaining product temperature within specification and operated to ensure specified temperatures are maintained. Temperature recording equipment with suitable temperature alarms shall be fitted to all storage facilities or there shall be a system of recorded manual temperature checks, typically on at least a 4-hourly basis or at a frequency which allows for intervention before product temperatures exceed defined limits for the safety, legality or quality of products. |  |  |
| **4.15.5** | Where storage outside is necessary, items shall be protected from contamination and deterioration. Items shall be checked for suitability before being brought into the factory. |  |  |
| **4.15.6** | The site shall facilitate correct stock rotation of raw materials, intermediate products and finished products in storage and ensure that materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life. |  |  |
| **4.16.4** | Maintenance systems and documented cleaning procedures shall be available for all vehicles and equipment used for loading/unloading. There shall be records of the measures taken. |  |  |

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| **5** | **Product control** |
| 5.1 | Product design/development |
| **SOI** | Product design and development procedures shall be in place for new products or processes and any changes to product, packaging or manufacturing processes to ensure that safe and legal products are produced. |
| **Clause**  | **Requirements** | **Conforms** |  |
| **5.1.2** |  | All new products and changes to product formulation, packaging or methods of processing shall be formally approved by the HACCP team leader or authorised HACCP committee member. This shall ensure that hazards have been assessed and suitable controls, identified through the HACCP system, are implemented. This approval shall be granted before products are introduced into the factory environment. |  |  |
| **5.2** | Product labelling |
| **SOI** | Product labelling shall comply with the appropriate legal requirements and contain information to enable the safe handling, display, storage and preparation of the product within the food supply chain or by the customer. |
| **Clause** | **Requirements** | **Conforms** |  |
| **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. |  |  |
| **5.2.3** | Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. a nutritional claim, reduced sugar), the company shall ensure that the product formulation and production process are fully validated to meet the stated claim. |  |  |
| **5.3** | Management of allergens |
| **Fundamental****SOI** | The site shall have a system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling in the country of sale. |
| **Clause** | **Requirements** | **Conforms** |  |
| **5.3.2** | The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products, and any new product development ingredients or products. |  |  |
| **5.3.4** |  | Procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination (cross-contact) of products not containing the allergen. These shall include, as appropriate:* physical or time segregation while allergen-containing materials are being stored, processed or packed
* the use of separate or additional protective overclothing when handling allergenic materials
* use of identified, dedicated equipment and utensils for processing
* scheduling of production to reduce changes between products containing an allergen and products not containing the allergen
* systems to restrict the movement of airborne dust containing allergenic material
* waste handling and spillage controls

restrictions on food brought onto site by staff, visitors and contractors and for catering purposes. |  |  |
| **5.3.5** |  | Where rework is used, or reworking operations are carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen. |  |  |
| **5.3.8** |  | Equipment or area-cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination (cross-contact) by allergens. The cleaning methods shall be validated to ensure that they are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use. |  |  |
| **5.4** | Product authenticity, claims and chain of custody |
| **SOI** | Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated food raw materials and to ensure that all product descriptions and claims are legal, accurate and verified. |
| **Clause** | **Requirements** | **Conforms** |  |
| **5.4.6** |  |  | The process flow for the production of products where claims are made shall be documented and potential areas for contamination or loss of identity identified. Appropriate controls shall be established to ensure the integrity of the product claims. |  |  |
| **5.5** | Product Packaging |
| **SOI** | Product packaging shall be appropriate for the intended use and shall be stored under conditions to prevent contamination and minimise deterioration. |
| **Clause** | **Requirements** | **Conforms** |  |
| **5.5.2** | Product liners and bags purchased by the company for use in direct contact with ingredients, or work in process, shall be appropriately coloured (e.g. contrasting colour to the product) and resistant to tearing to prevent accidental contamination. |  |  |
| **5.6** | Product inspection and laboratory testing |
| **SOI** | The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, legality, integrity and quality, using appropriate procedures, facilities and standards. |
| **5.6.2** | Laboratory testing |
| **Clause** | **Requirements** | **Conforms** |  |
| **5.6.2.2** | Where routine testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. Controls shall be documented, implemented and include consideration of:* design and operation of drainage and ventilation systems
* access and security of the facility
* movement of laboratory personnel
* protective clothing arrangements
* processes for obtaining product samples
* disposal of laboratory waste.
 |  |  |
| **5.6.2.3** | Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO/IEC 17025. Documented justification shall be available where accredited methods are not undertaken. |  |  |
| **5.6.2.4** | Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in clause 5.6.2.3. These shall include:* use of recognised test methods, where available
* documented testing procedures
* ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required
* use of a system to verify the accuracy of test results (e.g. ring or proficiency testing)
* use of appropriately calibrated and maintained equipment.
 |  |  |
| **5.6.2.5** | The significance of laboratory results shall be understood and acted upon accordingly.Appropriate action shall be taken promptly to address any unsatisfactory results or trends.Where legal limits apply, these shall be understood and appropriate action taken promptly to address any exceedance of these limits. |  |  |
| **5.7** | Product release |
| **SOI** | The site shall ensure that finished product is not released unless all agreed procedures have been followed. |
| **Clause** | **Requirements** | **Conforms** |  |
| **5.7.1** | Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and the release has been authorised. |  |  |
| **6** | **Process control** |
| **6.2** | Labelling and pack control |
| **Fundamental****SOI** | The management controls of product labelling activities shall ensure that products will be correctly labelled and coded. |
| **Clause** | **Requirements** | **Conforms** |  |
| **6.2.3** | Procedures shall be in place to ensure that all products are packed into the correct packaging and correctly labelled. These shall include checks:* at the start of packing
* during the packing 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
* allergen information.
 |  |  |
| **7** | **Personnel** |
| **7.1** | Training: raw material handling, preparation, processing, packing and storage areas |
| **Fundamental****SOI** | The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification. |
| **Clause** | **Requirements** | **Conforms** |  |
| **7.1.2** | Where personnel are engaged in activities relating to critical control points, relevant training and competency assessment shall be in place. |  |  |
| **7.1.6** | Records of all training shall be available. These shall include, at a minimum:* the name of the trainee and confirmation of attendance
* the date and duration of the training
* the title or course contents, as appropriate
* the training provider
* for internal courses, a reference to the material, work instruction or procedure that is used in the training.

Where training is undertaken by agencies on behalf of the company, records of the training shall be available. |  |  |
| **7.1.7** | The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience. |  |  |
| **7.4.4** | Protective clothing shall be changed at an appropriate frequency, based on risk. |  |  |
| **8** | **High-risk, high-care and ambient high-care production risk zones** |
| **SOI** | Where a site produces products that require handling in high-risk, high-care and/or ambient high-care production facilities (see Appendix 2 for the definition of products that require these facilities), all the relevant requirements from sections 1–7 of the Standard must be fulfilled in addition to the requirements in this section. |
| **8.1** | Layout, product flow and segregation in high-risk, high-care and ambient high-care zones |
| **SOI** | The site shall be able to demonstrate that production facilities and controls are suitable to prevent pathogen contamination of products. |
| **Clause** | **Requirements** | **Conforms** |  |
| **8.1.3** |  | Where high-care areas are part of the manufacturing site, there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, the nature of materials (including packaging), the equipment, the personnel, the disposal of waste, the flow of air, the air quality, and the provision of utilities (including drains). Where physical barriers are not in place, the site shall have undertaken a documented risk assessment of the potential for cross-contamination, and effective, validated processes shall be in place to protect products from contamination. |  |  |
| **8.1.4** |  | 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
* the flow of raw materials, packaging, products, equipment, personnel and waste
* air flow and quality
* the provision and location of utilities (including drains).

Effective processes shall be in place to protect the final product from microbiological contamination. These processes may include segregation, management of process flow or other controls. |  |  |
| **8.4** | Staff facilities for high-risk and high-care zones |
| **Clause** | **Requirements** | **Conforms** |  |
| **8.4.1** |  | Where an operation includes a high-risk or high-care area, personnel shall enter via a specially designated changing facility at the entrance to the area. The changing facilities shall incorporate the following:* clear instructions for the order of changing into and out of dedicated protective clothes to prevent the contamination of clean clothing
* protective clothing that is visually distinct from that worn in other areas and which shall not be worn outside the area
* a hand-washing routine during the changing procedure to prevent contamination of the clean clothing (i.e. hand-washing after hair covering and footwear have been put on, but before handling clean protective clothing)
* provision and use of hand-washing and disinfection facilities. At a minimum these shall be:
* prior to entry for high-risk areas
* on entry for high-care areas
* dedicated site footwear that is provided by the site and which shall not be worn outside the factory
* an effective control of footwear to prevent the introduction of pathogens into the area. Control may be by segregation and a controlled change of footwear before entering the area (such as a barrier or bench system) or by the use of controlled and managed boot-wash facilities where these demonstrably provide an effective control of footwear to prevent the introduction of pathogens into the area.

A programme of environmental monitoring shall be used to assess the effectiveness of footwear controls. |  |  |