SQF Food Safety Code: Food Manufacturing, Edition 9
System Elements – Key Changes

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

Summary of changes:

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

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

Summary of changes:

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

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

Summary of changes:

- Added detail regarding product formulations to include development by authorized persons and review when the there are changes in materials, ingredients, or equipment.

- Added process flow to 2.3.1.5.

- All specifications summarized under 2.3.2 and includes service providers.

- Added: suppliers to notify the site of changes in product composition that could have an impact on product formulation.

- Added Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.

- 2.3.2.4 has been split so that validation is retained in 2.3.2.4 and verification in 2.3.4.3.

- Co-manufacturers include high and low risk and third-party distributors.

- Approved supplier moved to 2.3.4 (formerly 2.4.4).

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System Elements - Key Changes

Edition 8.1		Edition 9	
2.4 Food Safety Systems	2.4.1 Food Legislation (Mandatory) 2.4.2 Good Manufacturing Practices (Mandatory) 2.4.3 Food Safety Plan (Mandatory) 2.4.4 Approved Supplier Program (Mandatory) 2.4.5 Non-conforming Product or Equipment 2.4.6 Product Rework 2.4.7 Product Release 2.4.8 Environmental Monitoring	2.2 Document Control and Records	2.2.1 Food Safety Management System (Mandatory) 2.2.2 Document Control (Mandatory) 2.2.3 Records (Mandatory)

Summary of changes:

- Product sampling now under 2.4.4 (formerly 2.5.4).

- Testing and analysis now includes reference to internal as well as external laboratories (internal lab formerly 11.8.1). Proficiency testing included in 2.4.4.2 (formerly 2.5.4.2).

- Non-conforming equipment moved to 11.1.7.9

- Product release to include a procedure to confirm that product labels comply with the applicable food legislation

- Positive product release procedure in 2.4.7.3.

	Edition 8.1		Edition 9
2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory)	2.5 SQF System Verification	2.5.1 Validation and Effectiveness (Mandatory)
	2.5.2 Verification Activities (Mandatory)		2.5.2 Verification Activities (Mandatory)
	2.5.3 Corrective and Preventative Actions (Mandatory)		2.5.3 Corrective and Preventative Action (Mandatory)
	2.5.4 Product Sampling, Inspection and Analysis		2.5.4 Internal Audits and Inspections (Mandatory)
	2.5.5 Internal Audits and Inspections (Mandatory)		

Summary of Changes:

- Added detail to where deviations from food safety requirements may occur.

	Edition 8.1		Edition 9
2.6 Product Identification, Trace, Withdrawal and Recall	2.6.1 Product Identification (Mandatory)	2.6 Product Traceability and Crisis Management	2.6.1 Product Identification (Mandatory)
	2.6.2 Product Trace (Mandatory)		2.6.2 Product Trace (Mandatory)
	2.6.3 Product Withdrawal and Recall (Mandatory)		2.6.3 Product Withdrawal and Recall (Mandatory)
			2.6.4 Crisis Management Planning

Summary of Changes:

- Added Crisis Management Planning to 2.6.4 (formerly 2.1.5).

- Emphasized labeling requirements and checks during operations to ensure that the correct product is in the correct package and with the correct label.

- Product changeovers to be inspected and approved by an authorized person.

- Procedures shall be implemented to ensure that label use is reconciled, and any inconsistencies investigated and resolved.

• Added requirements for testing the recall system to include products from different shifts and for materials across a range of products and customers.			
2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud	2.7 Food Defense and Food Fraud	2.7.1 Food Defense Plan (Mandatory) 2.7.2 Food Fraud (Mandatory)
Summary of Changes: • Consolidated to include all food defense and food fraud (from approved supplier)			

Edition 8.1		Edition 9	
2.8 Allergen Management	2.8.1 Allergen Management and Food Manufacturing (Mandatory) 2.8.2 Allergen Management for Pet Food Manufacturing (Mandatory) 2.8.3 Allergen Management for Manufacturers of Animal Feed	2.8 Allergen Management	2.8.1 Allergen Management (Mandatory)

Summary of Changes:

- Removed from allergen management the requirement to include labeling of gluten, where applicable.

- Added additional requirements regarding the approval, use, verification and reconciliations of labels.

2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory) 2.9.3 Instructions 2.9.4 HACCP Training Requirements 2.9.6 Refresher Training 2.9.7 Training Skills Register	2.9 Training	2.9.1 Training Requirements 2.9.2 Training Program (Mandatory)

Summary of Changes:

- Training consolidated down to two sections - 2.9.1 Training Requirements and 2.9.2 Training Program.

- Added training requirements for the following tasks:

- Sampling and test methods

- Environmental monitoring for relevant staff.

- Allergen management, food defense, and food fraud for all relevant staff.

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

Summary of Changes:

- 11.1 Site Location and Premises now covers 11.1.2 Building Materials; 11.1.3 Lighting and Light Fittings; 11.1.4 Inspection/QC Area; 11.1.5 Dust, Insect, and Vermin Proofing; 11.1.6 Ventilation; 11.1.7 Equipment and Utensils; and 11.1.8 Grounds and Roadways.

- Added a separate requirement for ventilation and positive air pressure.

- Equipment storage rooms moved to storage (11.6).

- 11.1.7.9 includes non-conforming equipment from (Formerly 2.4.5).

Edition 8.1		Edition 9	
11.2 Construction of Premises and Equipment	11.2.1 Materials and Surfaces	11.2 Site Operation	11.2.1 Repairs and Maintenance
	11.2.2 Floors, Drains and Waste Traps		11.2.2 Maintenance Staff and Contractors
	11.2.3 Walls, Partitions, Doors and Ceilings.		11.2.3 Calibration
	11.2.4 Stairs, Catwalks and Platforms		11.2.4 Pest Prevention
	11.2.5 Lightings and Light Fittings.		11.2.5 Cleaning and Sanitation
	11.2.6 Inspection/ Quality Control Area		
	11.2.7 Dust, Insect and Pest Proofing		
	11.2.8 Ventilation		
	11.2.9 Equipment, Utensils and Protective Clothing		
	11.2.10 Premises and Equipment Maintenance		
	11.2.11 Calibration		
	11.2.12 Pest Prevention		
	11.2.13 Cleaning and Sanitation		

Summary of Changes:

- 11.2 Site Operations. Includes 11.2.1 Repairs and Maintenance; 11.2.2 Maintenance Staff and Contractors; 11.2.3Calibration; 11.2.4 Pest Prevention; and 11.2.5 Cleaning and Sanitation.

- 11.2.2 Maintenance Staff and Contractors has been separated out from what was 11.2 Premises and Equipment Maintenance.

- Pest prevention restructured and clarified.

- Handwashing basins changed to stations.

Edition 8.1		Edition 9	
11.3 Personnel Hygiene and Welfare	11.3.1 Personnel 11.3.2 Hand Washing 11.3.3 clothing 11.3.4 Jewelry and Personal Effects 11.3.5 Visitors 11.3.6 Staff Amenities 11.3.7 Change Rooms 11.3.8 Laundry 11.3.9 Sanitary Facilities 11.3.10 Lunch Rooms	11.3 Personnel Hygiene and Welfare 11.3.2 Handwashing 11.3.3 Clothing and Personal Effects 11.3.4 Visitors 11.3.5 Staff Amenities (change rooms, toilets, break rooms)	11.3.1 Personnel Welfare
Summary of Changes: • 11.3.2.5 Combined references to signage for handwashing. • 11.3.3 Clothing and Personal Effects. (was "Clothing") Includes laundering, protective clothing, and jewelry. • 11.3.5 Staff Amenities includes change rooms, toilets, and break rooms.			
11.4 Personnel Processing Practices	11.4.1 Staff Engaged in Food Handling and Processing Operations	11.4 Personnel Processing Practices	11.4.1 Staff Engaged in Food Handling and Processing Operations
Summary of Changes: • Differentiated requirements for staff Personnel working in or visiting food handling areas. • Process flow captured in 11.4.1.3 (from 11.7.1).			

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

Summary of Changes:

- 11.5.1.1: Added to water supply plan a requirement for contingency plans to be in place for instances when the potable water supply is deemed to be contaminated.

- 11.5.4.2 New clause in ice supply that ice is sourced from an approved supplier and included in the site's food safety risk assessment and to be supplied in appropriate containers.

	Edition 8.1		Edition 9
11.6 Storage and Transport	11.6.1 Storage and Handling of Goods 11.6.2 Cold Storage Freezing and Chilling of Foods 11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods 11.6.4 Storage of Hazardous Chemicals and Toxic Substances 11.6.5 Loading, Transport and Unloading Practices 11.6.6 Loading 11.6.7 Transport 11.6.8 Unloading	11.6 Receipt, Storage and Transport	11.6.1 Receipt, Storage and Handling of Goods 11.6.2 Cold Storage, Freezing, and Chilling of Foods 11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods 11.6.4 Storage of Hazardous Chemicals and Toxic Substances 11.6.5 Loading, Transport, and Unloading Practices

Summary of Changes:

- 11.6.1.2: New clause to meet GFSI GMP 4.1 to ensure all materials are received and stored properly to prevent cross-contamination risks.

- 11.6.4: Storage of chemicals also applies to chemical storage references in 11.2.4 Pest Prevention.

- 11.6.5.4: New requirement for loading and unloading docks shall be designed to protect the product during loading and unloading.

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

Summary of Changes:

- 11.7.1.2 Ambient air in high risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.

- 11.7.3.11 New clause: "Gaskets, Rubber Impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency."

- Receipt of raw materials moved to 11.6.1

Edition 8.1		Edition 9	
11.8 On-site Laboratories	11.8.1 Location	11.8 Waste Disposal	11.8.1 Dry and Liquid Waste Disposal
11.9 Waste Disposal	11.9.1 Dry and Liquid Waste Disposal		

Summary of Changes:

- On-site laboratories moved to 2.4.4.

- 11.8.1.3 Moved from 11.2.9.5 in ed 8. "Waste and overflow water from tubs, tanks and other equipment shall be discharged direct to the floor drainage system and meet local regulatory requirements."

- 11.8.1.10 New clause to meet GFSI GMP 12.1 regarding the effective removal and storage (if required) of waste water.