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# CODE OF PRACTICE AND TECHNICAL STANDARD

***STS Food Safety Standard:*** *For food suppliers & distributors (All food version)*

ISSUE NO. 10

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## FOREWORD

This Code of Practice and Technical Standard (The Standard) has been specifically created to set an audit standard for food manufacturers, distributors or buyers/brokers who are supplying food and/or food related products to food supply chain, caterers and retailers. This Standard also has added controls included for those supplying food or food related products to potentially at-risk consumer groups, whether these be in healthcare, education or other relevant environments.

This latest version of the Standard has been updated in conjunction with key stakeholders and certified suppliers. It sets the criterion for the control of specific organisms such as *Listeria monocytogenes* in order to protect the health and welfare of vulnerable group consumers as well as those who fall outside of this category. Furthermore, this standard lays out the requirements for the ongoing maintenance not just of food safety but that of food origin, traceability and authenticity.

This is a Standard that is set upon the principals of HACCP and its full and thorough implementation at all stages of procurement, manufacture, storage and distribution. This standard requires that all food manufacturers, distributors and/or agents have HACCP systems in place which are always fully implemented and operated.

This Standard has been developed over a number of years and 'versions'. This version ensures that all recent relevant legislative requirements have been incorporated, including those of the Food Information Regulations 2013. Additionally, aspects of public enquiry reports such as the Elliott Review and guidance from the Food Standards Agency and Advisory Committee on Microbiological Safety of Food have also been included within.

The 2020 version amends governance processes detailed within which will help ensure that a consistent approach to the certification processes is always achieved. Furthermore, requirements associated with quality management systems such as ISO 9001 and ISO 17065 have been set into the quality procedures associated with the management of the Standard. This latest revision follows the initial launch of Version 9 and incorporates feedback from auditors and users.

This Standard has been produced to encapsulate all the functions or the individual aspects of head office, food manufacture, distribution and wholesale/brokerage. These may be treated as a standalone or combined to involve the whole Standard. Therefore within the Standard, there are sections included that may not be relevant to individual businesses, these are identified in separate standalone versions e.g. Storage & Distribution / Buyers and Brokers etc. These separated versions are available on request from Micron2.

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## 1.0 INTRODUCTION

1.1 This document outlines aspects of good manufacturing practice, storage and distribution and where applicable legal requirements, which are standards required of food processors and suppliers that supply, or intend to supply food, ingredients and food related items.

1.2 The objectives of the Standard are to:

- Enhance food safety
- Ensure consumer protection
- Strengthen consumer confidence and
- Improve cost effectiveness through the food supply chain

1.3 The Standard has been developed with the participation of technically competent personnel of interested parties.

1.4 The Standard shall be subject to periodic review and update, at least every three years, with the involvement of representatives of interested parties.

1.5 The latest Standard will be available upon request from Micron2. Certificated food processors and suppliers will be notified by email of any update of the Standard. An up to date copy of this Standard shall be held on site by the supplier.

1.6 Compliance with the Standard does not absolve food processors and suppliers from their legal obligations in terms of hygiene, safety or other food manufacturing criteria. Food processors and suppliers are advised to study the content of all pertinent legislation and guidance in full and to take heed of any proposed legislation that may necessitate changes in the sourcing, manufacturing, storage and distribution processes. Legal compliance must always be demonstrated.

1.7 Auditors, employed by Micron2, must be allowed free access to all food production, preparation, storage and distribution premises and vehicles, at any reasonable time, allowed to examine all relevant documentation and records. In addition, product samples may be required for analysis by an independent UKAS accredited laboratory; this will be arranged by Micron2 as part of the auditing process as applicable.

1.8 The operative date of this issue of the Standard is the 1st January 2021.

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## 2.0 SCOPE OF STANDARD

2.1 This Standard has been developed to cover all activities in the food supply chain which may affect the food safety, quality and legality of products being processed/manufactured and/or stored and/or distributed and/or sold through wholesale/buyers & brokerage operations.

## 3.0 SCOPE OF AUDITED COMPANY OPERATIONS

3.1 The Standard will be applied to companies providing manufacture and/or storage and/or distribution of products. It can also be applied to those companies that operate a wholesale operation, where a company operates a wholesale business and has storage and distribution facilities under its direct control. The Standard will be applied to the scope of the operation determined upon assessment of the completed audit application form. Where there is no associated manufacture or storage and distribution premises at the audit location, the relevant sections of the standard will be applied for wholesaling/buyer/brokerage (see section 5.0). The certification scope and certification report shall reflect that no manufacturing or storage and distribution operations have been audited.

3.2 The manufacture and/or storage and/or distribution and/or sourcing operations to which the Standard may be applied can be at production, warehouse or administrative locations.

3.3 The scope of this Standard is related to distribution of products by road. It does not extend to air, sea or rail transportation vessels.

3.4 The Standard covers food safety, quality and legality for food and food related products, which may be the:

- Manufacture of food ingredients for further processing
- Manufacture of finished food products
- Manufacture of part prepared food products e.g. cook-chill, sous vide, cook freeze
- Storage and distribution of food and food related products
- Wholesale, buyer and broker operations for food and food related products

Certificates issued will include aspects of the above scopes, as requested at application.

## 4.0 SCOPE OF APPLICABLE PRODUCTS

4.1 The scope covered by this Standard is for all food that is manufactured and processed. The scope is also for food products and/or food related products that are stored and distributed; or purchased through wholesale or buyer/broker operation, for onward sale for further processing or sale or consumption within catering or retail operations.

4.2 This standard does not apply to:

- Live animals (except crustaceans for human consumption)
- Loose or unprocessed bulk agricultural products

## 5.0 NON-APPLICABLE CLAUSES

5.1 There are some clauses that apply specifically to food manufacturing operations and some others that are specific to distribution or wholesale which may not be applicable to a site being audited. Wholesale operations which function from a remote office with no associated manufacturing or storage or distribution facilities will be subject to audit only against the documentary aspects of the management control of the food commodities. This Standard is structured to clearly identify which sections/clauses are relevant to which type of operation. The table below helps to summarise the main relevant sections by supplier type:

| Section | Food production only | Food production with distribution | Storage & Distribution only | Wholesale/ Buyers & Brokers |
|---|---|---|---|---|
| 1-7 | ✓ | ✓ | ✓ | ✓ |
| 8 | ✓ | ✓ | ✓ | ✓ |
| 9 | ✓ | ✓ | ✓ | ✓ |
| 10 | ✓ | ✓ | ✓ | |
| 11 | ✓ | ✓ | ✓ (depending on scope/business not all clauses will apply) | Partial |
| 12 | ✓ | ✓ | ✓ (depending on scope/business not all clauses will apply) | Partial |
| 13 | ✓ | ✓ | | |
| 14 | | ✓ | ✓ | |

5.2 Where elements of the Standard are not pertinent to the scope of the sites activities these specific requirements may be excluded and will be identified as not applicable (N/A) in the final audit report. The final audit report will include justification on any clauses deemed as not applicable or excluded.

5.3 Operations shall be reviewed for their applicability to certification and the pertinent requirements of this Standard during application/contract review stage.

5.4 Wherever an operation subcontracts activity that could impact on the safety, quality or legality of the food product, the contract and other documentary checks shall be included in the audit process to confirm management control of the process. This is particularly relevant for Buyers & Broker operations. Examples of contracts for assessment will include (but not limited to) production/processing operations, laboratory services, distribution agents and any related intermediaries, customers etc.

## 6.0 AUDIT AND MONITORING PROCEDURES

6.1 On instruction an introduction pack will be sent to the food supplier. The application form and terms of business shall be completed and returned as soon as possible with copies of the last enforcement officer's report for food standards (e.g. composition and labelling), food hygiene and Food Standards Agency report where appropriate. The site HACCP assessment shall be provided along with any notices served in the last twelve months so that the food processor's operation, location(s), size, existing controls and systems can be identified and the auditor prepared for the audit.

6.2 In respect of initial audits, the duration of the visit shall be determined upon receipt of the completed application form having due regard to:

- The number and type of activities being undertaken by the applicant
- The product risk factor (high or low)
- The conditions under which the product is packaged and stored
- The intended method of preparation of the food by the customer
- The size of the site/sites and number of sites to be audited within product range
- The number of employees and shift system.

6.3 Following review of the site details the applicant will be advised of the duration of the audit and confirmation of the proposed scope and fees (on site and report writing / relevant admin costs). The audit date cannot be booked until full payment or a purchase order number has been received.

6.4 Expected audit durations **on site** for typical operations would be as follows:

| | |
|---|---|
| Food manufacture without distribution | 1.5 days |
| Food manufacture with in-house distribution | 2 days |
| Storage & distribution only | 1 day |
| Wholesale/Buyers & Brokers | 1 day |

Variations to expected audit durations (shorter or longer) may be possible and will be determined/agreed during the audit application process.

6.5 Expected standard audit durations are detailed in 6.4. Variations to this duration may be applied following review of the completed application form. A minimum of 50% of the on- site audit duration shall typically be spent physically auditing the site and processes.

6.6 In respect of the report preparation, audit notes, sign off any non-conformance and responding to issues following the audit, a minimum Off-site duration shall be 3.5 hours (½ day). This shall be added to each audit within the durations highlighted in 6.4 (e.g. 1.5 days on site plus half day off site).

6.7 Renewal of certification will include re-audit visits, which shall be executed at a maximum frequency of 12 months (unless 6.8 is relevant).

6.8 Re-audit visits shall be executed every six months in respect of the following process or circumstances:

- Manufacturers of high risk ready-to-eat products e.g. sandwiches, sandwich fillings, soft cheese, pate, etc. that are likely to support the growth of *Listeria monocytogenes*
- Handling of open/unpacked raw and cooked meat or meat products
- Cook-chill and sous-vide production
- Thermal processing, low acid foods
- Aseptic packaging, low acid foods

6.9 An additional audit visit (announced or unannounced) may be required in the event of the supplier notifying Micron2 of any of the following circumstances:

- Relocation to new premises (with the expectation of circa 3 months in the new site).
- Modifications to the certified process
- New processes/products
- Outstanding non-conformances
- Product recall, withdrawal or incident (see 6.12)
- Client request
- Significant complaint notification/significant complaint trend

Notification of changes would be acceptable via email, letter, telephone call or third-party/client communication.

6.10 The audit shall ensure that the supplier has in place documentation and systems that demonstrate compliance with this Standard. The evaluation shall include a documentation review; inspection of the premises and process(es); and review of the implementation of the documented system supporting the processes. To achieve and maintain certification the Company shall always demonstrate a commitment to ensuring and maintaining compliance with the requirements of this Standard.

6.11 If the Company becomes aware of possible legal proceedings with respect to product safety or legality, or is in receipt of a formal notice, the Company shall immediately notify Micron2. Micron2 shall take necessary steps to assess the situation and any implications for the certification, and to take any appropriate action.

6.12 In the event that the Company becomes aware that pathogens including *Listeria monocytogenes* are detected in any foods and/or environmental samples taken from food production equipment or food contact surfaces; whether taken by the Company or another party (e.g. final consumer), the Company shall notify Micron2.

Pathogen notifications to Micron2 shall be made immediately for ready-to-eat ingredients and product, and within 24 hours for environmental samples (taken from food production equipment or food contact surfaces) and non-ready-to-eat ingredients and product. Micron2 can be notified via notifications@micron2.com and Micron2 shall be kept up to date within any corrective action and re-sampling results. Micron2 shall take appropriate steps to assess the full situation with discussion with the company and then consider any implications for the certification and take any appropriate action.

*Listeria monocytogenes* detections shall be notified in accordance with the 'Micron2 Protocol for *Listeria monocytogenes* detections' and associated 'Micron2 *Listeria monocytogenes* notifications form'. Where appropriate (i.e. if >100cfu /g are found) the local authority shall also be informed.

The Company shall familiarise themselves with the 'Micron2 Protocol for *Listeria monocytogenes* detections' and associated Micron2 *Listeria monocytogenes* notifications form', available from Micron2.
In the event of a product recall, withdrawal or incident, the Company shall inform the local

authority, Food Standards Agency and Micron2 immediately of the situation and provide details relating to the incident. Micron2 shall take appropriate steps to assess the situation, have regard to any investigation by the local authority, and any implications on the certification and to take any appropriate action. In respect of BRCGS certified sites, Micron2 are required to immediately notify them of an event with follow up.

6.13 Prior to the commencement of the audit, an opening meeting will be held with senior management from the Company to:

- Introduce the auditor and Company representatives
- Ensure the scope, coverage, objectives and timing of the visit are clearly understood and personnel required are available
- Ensure the Company representative(s) understand the audit purpose
- Confirm that all findings will be treated in strict confidence
- Confirm that arrangements have been made for an office or base to be made available to the auditor
- For unannounced audits the opening meeting will take place after the initial inspection / audit of the manufacturing areas, these areas are to be entered within 30 minutes of arrival

6.14 Throughout the audit of the operation a suitable Company Quality Assurance/Technical Manager and Production / Process Manager should accompany the auditor. Failure to host an audit with a suitably competent representative of the Company may result in the audit being suspended and the Company charged a cancellation fee.

6.15 As part of the audit, a closing meeting will be held with nominated management from the Company to:

- Remind those present of the scope and objectives and Confidentiality of the process agreed at the opening meeting.
- Confirm the position regarding any observations made to the supplier's representatives during the audit.
- Clearly provide in writing for supplier's confirmation signature any non-conformances noted during the audit against the Standard.
- Summarise the overall acceptability of the operation in the light of the non-conformances found thereby indicating the severity of those non-conformances. The auditor may propose a recommendation for certification status, but the final decision shall remain that of the certification body.
- Agree an action plan for the supplier to correct the non-conformances against an appropriate timescale; this will be no more than 28 days from the audit date; with objective evidence (OE) to be sent into Micron2 to provide agreed confirmation of corrective actions. The relevant email address will be confirmed at the time of the audit.
- An appropriate timescale will consider the nature of the work and the ease of achieving compliance e.g. cleaning/not completing records – immediate with OE in 28 days, building related works an agreed quotation from a builder with start and finish date in 28 days.
- Where appropriate, agree the date of the next audit as either 6 or 12 months subject to finalisation of the certification process.

**NOTE -** The Certification Body shall also retain the right to amend any audit finding/recommendations/time-scales post audit, including the assessment of a non-conformance as being critical, major or minor in nature.

6.16 The auditor will assess the nature and significance of any non-conformance.

**There are three levels of non-conformance:**

**CRITICAL:**
There is a critical failure to comply with a clause of the standard, which presents an imminent food safety risk or that there is evidence of consistent food safety management failure giving rise to an imminent food safety risk.

A critical non conformance will result in "Not Certificated" status.

**MAJOR:**
There is a substantial failure to comply with a clause of the standard, but does not present an imminent food safety, quality or legal risk.

Three or more majors raised during the initial audit will result in "Not Certificated" status.
Three or more majors raised during a re-audit will result in "Not Certificated" status and require an on-site re-audit.

**MINOR:**
There is a minor failure to comply with a clause of the Standard, but does not present a food safety, quality or legal risk.

Three or more minors in a section will be deemed a single Major non-conformance.

6.17 In respect of critical non-conformance, the Company **shall not gain certification**. Where sites are currently certified this will be withdrawn. There shall at the Company's request; be a full on-site re-evaluation carried out to demonstrate compliance, at the Company's expense.

6.18 In respect of major non-conformance, for all audit evaluations, major non-conformance shall be corrected within 28 days to ensure renewed certification. A certificate shall not be issued until the Company has provided satisfactory objective evidence. In the case of three or more major non-conformances, or where evidence can only be demonstrated on site, a further on- site re-audit visit shall be necessary to demonstrate compliance, at the applicant Company's expense.

6.19 In respect of minor non-conformance these shall normally be completed within 28 days to ensure certification. Where evidence can only be demonstrated on site or there are more than 20 minors, a further on-site re-audit visit shall be necessary to demonstrate compliance; at the applicant Company's expense. A certificate shall not be issued until the Company has provided satisfactory objective evidence.

6.20 Where evidence is not provided within the set time period, Micron2 shall deem the non- conformance as not addressed and certification shall not be granted. Sites holding current Micron2 certification shall be deemed as 'lapsed' In order to achieve certification, a full on-site re-audit shall usually be required at the Company's expense.

6.21 The Certification Body (Micron2) shall, after consideration of the auditor's written report advise the Company of the status awarded on the following basis:

| | |
|---|---|
| **Certificated** | Where the organisation assessed has no non-conformances or whilst it does not fully satisfy the requirements of this standard it can demonstrate an acceptable level of control and all non-conformance raised during the audit have been corrected within 28 days of the date of the audit. |
| **Not certificated** | Where the non-conformances identified are of such a nature or extent that the imminent safety and/or legality of the product or processes undertaken cannot be assured (e.g. critical). |

6.22 For certified companies, where deemed appropriate, further visits, product sampling and/or information requests to validate continued certification may be carried out. These visits may take the form of announced or unannounced visits to either undertake a full or part evaluation. Unannounced audits may be undertaken at the specific request of a client; following notified incidents, recalls or withdrawals; in the case of reoccurring or serious food complaints and/or concerns raised by enforcement authorities.

6.23 Unannounced audits: to verify if the Company is complying with the Standard.
The Company may apply for an unannounced audit at the application stage.
A Client may request that all their suppliers be subject to unannounced audits.
The Company may request a mix of announced and unannounced audits providing the necessary contract and payment scheme is in place. This agreement could instigate a series of unannounced audits part way through the life of a certificate.
Micron2 may as part of their Accreditation; instigate a series of unannounced audits part way through the life of a certificate.
In all cases the resultant report and renewed certificate will run to the natural certificate life.

6.24 Certification may be withdrawn or suspended/lapsed in the following circumstances:

a. Failure to progress re-audit in a timely manner
b. Critical non-conformance
c. Failure to provide objective evidence in respect of non-conformance in a timely manner
d. Failure to maintain standards confirmed by further visits (announced or unannounced), product sampling or information provided
e. Failure to allow the STS auditor unencumbered access to all appropriate areas and documents
f. Serious or re-occurring food complaints
g. Withholding information in respect of enforcement action (Section 6.11)
h. Failure to notify Micron2 in respect of legal action or product recall, withdrawal or incident (section 6.11 and 6.12)
i. Where enforcement authorities are preparing/taking legal action (section 6.11)
j. Product contamination issues including *Listeria monocytogenes*

6.25 Following each audit, a written report shall be uploaded into the Micron2 database for authorised parties (by log in details) to download. These may be:

a. The nominated Company representative(s)
b. Clients for whom the Company is listed to supply with Micron2 which may include: NHS Trusts, education authorities, public sector procurement bodies, private sector procurement bodies, foodservice organisations, retailers.
c. Enforcement authorities.

6.26 Following the initial audit under this Standard the certificate expiry date will be the appropriate evaluation frequency (time on site) plus 42 days, which shall allow time for compliance with any subsequent non-conformances.

6.27 The re-audit shall be undertaken on or before the audit due date (so far as practicable) but before the certification expiry date in order to maintain certification. The audit due date shall be the same date as the initial evaluation date and shall not change in line with future re-evaluation visit dates. For example, if the initial audit is completed on 1st June then subsequent re-audit due dates will be set as 1st June for all subsequent evaluations.

6.28 The audit report and associated information shall be stored safety and securely for a period of at least five years by Micron2.

6.29 Whilst the certificate is issued to the Company, it remains the property of Micron2 and must be returned on request.

6.30 If certification is withdrawn, suspended or is not maintained (lapsed), the Company must withdraw from displaying the certificate and remove all reference from publicity material etc as required by Terms and Conditions provided within the Application form.

6.31 Where certification is not achieved during initial evaluation audits or subsequent visits, Micron2 shall notify any relevant client(s) to whom the audited supplier provides services/goods, of the audit failure.

6.32 Products produced, stored or distributed under this Standard shall not be labelled, marked or described in a manner, which implies that they meet this Standard.

6.33 Micron2 Ltd operates a complaints and appeals procedure, details of which are available on request.

## 7.0 AUDITOR QUALIFICATIONS, TRAINING AND EXPERIENCE

### 7.1 Qualification

7.1.1 The auditor shall have a minimum of five years relevant industry experience and hold an appropriate food safety related higher education qualification such as Diploma or Degree. Where no higher education qualification is held, then over 10 years relevant food industry experience is required.

### 7.2 Training

7.2.1 The auditor shall have successfully completed a lead assessor course or equivalent (five-day course) and have undergone a supervised period of training in practical assessment.

7.2.2 The auditor shall have successfully completed assessed training in HACCP based on the principles from Codex Alimentarius and be able to demonstrate competence in the understanding and application of HACCP principles (a course lasting no less than 2 days).

7.2.3 Auditors will have undertaken training against the needs of this Standard. Such training shall be completed before undertaking any unaccompanied audits.

Auditors must complete a minimum of one audit where they observe, and one successful witnessed audit by a Lead Auditor prior to undertaking unaccompanied audits. Witness audits shall be completed by Lead Auditor trained personnel.

### 7.3 Experience

7.3.1 The auditor shall have a minimum of five years' experience relevant to the food industry.

7.3.2 The auditor shall perform a minimum of five relevant audits per year. Where an auditor has not achieved the minimum in any twelve-month period, they shall be subject to re-assessment by a Lead Auditor.

7.3.3 Each auditor will be assessed by a competent Lead Auditor in the sector every twenty-four months unless they have been assessed by an external body e.g. UKAS in that time.

7.3.4 Auditors shall attend Micron2 internal training/calibration meetings..

### 7.4 Training Records

7.4.1 Records shall be maintained to demonstrate that every auditor has appropriate and up-to date training and experience and knowledge for the fields in which they are competent.

## 8.0 FOOD SAFETY MANAGEMENT SYSTEM

### 8.1 General Requirements

8.1.1 The Company shall have a food safety management system, which is based on the principles of Hazard Analysis Critical Control Point (HACCP), which shall be documented, maintained, implemented and continually improved. The system will have a scope appropriate to the range of business activities to being undertaken, identifying the intended use of the products manufactured/handled including documented procedures or specific reference to them and describing the interaction of the related processes.

8.1.2 The Company shall have a clear, concise and documented food safety policy statement and objectives that specifies the extent of the organisation's commitment to meet the safety, legality and quality needs of its products.

8.1.3 The food safety management system shall be developed, reviewed and managed by a competent, experienced and appropriately trained team, which shall include representation from all appropriate areas of the business. The team members shall have documented training related to HACCP.

8.1.4 The food safety management system shall have management and staff commitment to the implementation, development and improvement of the system.

8.1.5 The Company shall establish and document a clear organisational structure that unambiguously defines and documents job function, responsibilities including deputy cover and reporting relationships, especially in respect of activities which affect product safety, legality and quality.

8.1.6 The Company shall use Codex Alimentarius HACCP principles to:

- Undertake a comprehensive hazard analysis
- Determine the Critical Control Points (CCPs)
- Establish critical limits
- Establish a system to monitor control of the CCPs
- Establish the corrective actions to be taken when monitoring indicates that a CCP is not under control
- Establish procedures of validation and verification to confirm that the HACCP system is working effectively, including audit of the HACCP system
- Establish documentation concerning all procedures and records appropriate to these principles and their application, having regard to the nature and size of the business.
- Provide at least annually, or if there are changes or product related alerts, a review of the assessments including pre-requisites.

8.1.7 The food safety management system shall document a prerequisite programme, including (but not limited to) good manufacturing or storage practice, personal hygiene, training, pest control, structure and equipment, maintenance of cold chain and cleaning including disinfection where appropriate.

8.1.8 The Company's senior management shall review the effectiveness of the food safety and quality management system at appropriate planned intervals, and at least annually, to ensure its continuing suitability, adequacy and effectiveness. Such a review will evaluate the need for changes to the food safety management system, including the food safety and quality policy.

8.1.9 Verification checks shall be undertaken to demonstrate that the documented procedures are working reliably. Verification shall be undertaken periodically at frequencies enough to show that all procedures are operating effectively; whenever new or amended procedures are put in place and following maintenance work. Verification shall extend to local operations where the Company has a central and satellite operation structure.

8.1.10 The Company shall maintain and have available a copy of the most up to date version of the Standard.

**8.2 Resource Management**

8.2.1 The Company's senior management shall determine and provide, all the resources necessary to implement, maintain and improve the process of the food safety management system and to address customer satisfaction.

**8.3 Document Control**

8.3.1 The Company shall ensure that all documents and records required to demonstrate the effective operation and control of its processes and its management of product safety, legality and quality, are securely stored, effectively controlled and readily accessible when needed.

8.3.2 The Company shall maintain a system of documentation control which ensures all documents are properly indexed, authorised; obsolete documents are rescinded and replaced, where appropriate, with a revised version; and that superseded documents are retained for an established period to respond to any safety, legality and quality issues.

**8.4 Specifications**

8.4.1 The Company shall ensure that comprehensive specifications are maintained and reviewed regularly (at least annually) and records of updates maintained. Specifications shall not be more than three years old and authorised in respect of:

- raw materials (including packaging)
- intermediate products
- finished products

8.4.2 The specifications must be securely stored and made readily accessible when needed.

8.4.3 The Company shall establish and maintain product and ingredient specifications to include, "physical" properties, microbiological standards, food standards, quality and composition standards, packaging and labelling where appropriate, having regard to any legislative requirements and good manufacturing practice.

8.4.4 Specifications shall be authorised and, where appropriate, be agreed with relevant parties. Specifications shall include (but not limited to):

- Product description, size, weight, dimensions etc.
- Temperature control requirements (as relevant)
- Labelling (including allergen and nutritional information)
- Packaging
- Transportation/handling requirements

*For Storage & Distribution and Wholesale & Buyer/Broker operations ONLY:*

8.4.5 The Company shall ensure that comprehensive specifications are maintained, reviewed regularly (at least annually) and records of updates maintained. Specifications shall not be more than three years old and authorised. Product specifications must be available which shall clearly detail packaging and labelling requirements for each product sourced.

**8.5 Procedures**

8.5.1 The Company shall ensure that comprehensive procedures and/or work instructions are documented, maintained, implemented and reviewed for all process and operations having an impact on product safety, legality and quality. Such documentation must be securely stored and readily accessible when needed.

**8.6 Records**

8.6.1 The Company shall ensure that comprehensive records are maintained in accordance with the food safety management system and specifically in respect of the records required in accordance with the HACCP assessment (including analyst certificates for food standards and traceability). Such documentation must be securely stored and readily accessible when needed.

8.6.2 The Company shall ensure that all records are retained for an established period that shall reflect product shelf life, or at least one year to respond to any safety, legality, customer requirement and quality issues.

**8.7 Internal Audit**

8.7.1 The Company shall have an internal audit system in place in relation to all systems and procedures, which impact upon product safety, legality and quality.

8.7.2 The internal audit frequency shall be programmed in relation to the risks associated with the activity. A minimum frequency of annually would be expected.

8.7.3 The results of all programmed internal audits and associated corrective actions shall be maintained and the results bought to the attention of the management responsible for the activity audited, for necessary action.

8.7.4 Any corrective actions required following an internal audit shall have a suitable timescale for completion. On completion a record of the corrective action taken, and date completed shall be retained with the appropriate internal audit record.

8.7.5 Where alternative corrective action is taken, or timescales are not achieved a record of the circumstances and/or amended timescale shall be retained with the appropriate internal audit record.

8.7.6 Internal auditors shall be independent of the areas they are to audit (including documented systems) and shall have completed suitable training.

**8.8 Corrective Action**

8.8.1 The Company shall ensure that procedures for the determination and implementation of corrective action in the event of any non-conformance relating to product safety, legality and quality are investigated and documented and that all such documentation is securely stored and readily accessible when needed.

8.8.2 Corrective actions shall be allocated to appropriate, designated persons and actions completed and documented within appropriate timescales. Corrective actions shall identify the root cause of the non-conformance and shall clearly detail corrective actions necessary.

**8.9 Control of Non-Conformance**

8.9.1 The Company shall ensure that procedures for the control of any product, which does not conform to safety, legality and quality requirements, are prepared and documented and that all such documentation is securely stored and readily accessible when needed.

8.9.2 Documented control of non-conformance procedures shall extend to include a procedure/policy for the receipt/acceptance of customer returns/rejected deliveries.

8.9.3 Any non-conforming product, whether identified on the Company premises or returned from customers must be held suitably labelled or in a suitably physical or electronic location to prevent sale/picking or the contamination or affect the authenticity of any other product.

**8.10 Product Release**

8.10.1 The Company shall ensure that procedures for appropriate product release are prepared and documented and that such documentation is securely stored and readily accessible when needed.

**8.11 Purchasing and Contracted Services**

8.11.1 The Company shall operate procedures for the selection, approval and continued monitoring of its suppliers, which impact upon product safety, legality and quality. Such procedures shall be based on a process of risk assessment and shall extend to include suppliers/buyers overseas, whether services are provided directly or contracted out. This shall extend to any sub contracted services employed.

In respect of ready to eat foods supplied for use by vulnerable groups, supplier approval procedures must consider the ingredient supplier's *Listeria monocytogenes* risk management and controls.

8.11.2 The results of supplier evaluations and follow up actions shall be recorded, maintained up to date and records to be retained for a period of at least three years to respond to any safety, legality and quality issues.

8.11.3 The Company shall operate procedures for the review of suppliers/contractors based on specified criteria that shall include customer complaints, sample results, product recall/withdrawals or notification of change of supplier/contractor Company status.

8.11.4 Documented contracts between the Company and supplier/contractor shall detail the service provided by the supplier/contractor. This shall include (but not be limited to) the following:

- Suppliers of raw materials
- Packaging
- Laundry services
- Pest control
- Laboratory services
- Transport or distribution agents
- Equipment maintenance and equipment provision

8.11.5 Where the Company undertake their own physical assessment of its suppliers, they shall demonstrate that the auditor is suitably trained, knowledgeable and experienced.

8.11.6 Performance of suppliers shall be monitored. Where contractual requirements are not being met, appropriate corrective action shall be taken. Any such corrective action shall be documented. This shall extend to any sub-contractors, where they are employed.

8.11.7 A register of all suitable sub-contractors shall be maintained.

**8.12 Product Identification and Traceability**

8.12.1 The Company shall develop and maintain appropriate procedures and systems to ensure the identification and traceability. This at any stage of processing, production, purchase and delivery destination and any outsourced product, ingredient, packaging material or service. Such procedures to be documented and such documentation must be securely stored and readily accessible when needed.

8.12.2 In respect of meat and fish products traceability is to be available to the manufacturer back to the farm/source.

8.12.3 The traceability system both from raw materials through to customer/s and vice versa must be tested at least annually with such tests being fully documented.

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8.12.4 In respect of product wholesalers/buyers & brokers they must be able to demonstrate that their suppliers/manufacturers maintain traceability back to the farm/source in respect of meat and fish products with annual documentary evidence of their traceability exercise.

8.12.5 The Company shall develop and maintain appropriate procedures and systems to ensure the identification of the purchaser and delivery destination for all products supplied. Such procedures to be documented and such documentation must be securely stored and readily accessible when needed.

**8.13 Complaint Handling**

8.13.1 The Company shall develop, maintain and implement an effective system for the management of complaints. This shall include mechanisms to notify the complainant and (where relevant) product manufacturer/suppliers where the complaint does not relate to the Company activities/premises. The system shall be documented, and such documentation securely stored and readily accessible and maintained for no less than three years.

8.13.2 The Company shall periodically review complaint data, according to risk and frequency of complaints, especially re-occurring issues, to identify any trends and evidence of shortcomings in food safety, legality and quality. Such reviews to be documented with any corrective action taken to prevent a reoccurrence.

**8.14 Product Recall, Product Withdrawal and Incident Management**

8.14.1 The Company shall develop, maintain and implement effective incident management procedures for product withdrawal and recall in the case of product safety, authenticity, legality and quality. The procedure is to be documented and such documentation to be securely stored and readily accessible when needed. A list of key contacts in the event of a recall shall be maintained.

8.14.2 The recall procedure shall be regularly tested according to risk (at least annually) to ensure its effectiveness and a record of the test (as for 8.14.6 below) and any necessary corrective action retained.

8.14.3 The recall procedure shall be regularly reviewed and, if necessary, revised having regard to any test results and legislative changes.

8.14.4 The Company shall ensure that any product withdrawn or recalled is either suitably disposed of to ensure it cannot re-enter the food chain or is suitably treated or reworked to ensure it complies with food safety requirements.

8.14.5 In respect of any product recall, product withdrawal and incident, the Company **shall** notify relevant customers and suppliers with immediate effect. Also, the relevant Local Authority and the Food Standards Agency. Micron2 **must** be notified within three working days to notifications@micron2.com For *Listeria monocytogenes* detections and incidents, the 'Micron2 Protocol for *Listeria monocytogenes* detections' **must** be followed (which requires notification to Micron2 immediately or within 24 hours depending on the nature of the sample).

8.14.6 Comprehensive documentation of any product withdrawal or recall is to be maintained, including the log of events, minutes/action notes of the recall/incident team, notices issued to the press, customers etc., product supplied, customers supplied, product accounted for the method of disposal and verification of such action.

8.14.7 The Company shall develop, maintain and implement effective incident management procedures for: Emergency situations that impact food safety, authenticity, legality and quality. This may include (but not limited to) pandemic/epidemic, loss of facilities due to fire, flood or natural disaster, malicious contamination or sabotage, major internal and external threats against supply chain, raw materials, production and final product manufacture. The procedure is to be documented and such documentation to be securely stored and readily accessible when needed. A list of key contacts in the event of an incident/recall shall be maintained.

**8.15 Control of Measuring and Monitoring Devices**

8.15.1 The Company shall identify the measurements impacting upon food safety, legality and quality.

8.15.2 The Company shall identify the measuring and monitoring devices required to assure product safety, legality and quality and ensure their calibration at an appropriate

frequency.

8.15.3 The Company shall identify the methods required to assure calibration and accuracy of measuring and monitoring devices.

8.15.4 The Company shall maintain records of calibration for a minimum period of three years and such records to be securely stored and readily accessible when needed.

## 9.0 PRODUCT DEVELOPMENT & ANALYSIS

### 9.1 Product Analysis

9.1.1 The Company shall establish, implement and maintain a sampling plan suited to the products and/or nature of the business to ensure that product and ingredient analysis critical to the confirmation of product safety, authenticity, legality and quality is undertaken. The plan shall include shelf-life testing and environmental sampling. In respect of the manufacture and handling of high risk ready-to-eat products regarding *Listeria monocytogenes* the shelf-life testing shall reflect the storage temperatures and length of time out of chill that products are likely to experience in client premises.

The level of sampling shall be based on a thorough risk assessment. Sampling and testing plans shall be commensurate with the risk including nature and size of the food operation and reflect aspects such as raw materials, process validation, verification and monitoring (e.g. product characteristics such as pH, aw (water activity), salt concentration and/or concentration of chemical preservatives); time and temperature of storage; and food destined for vulnerable groups. Analysis shall also be undertaken to indicate the outcome of temperature abuse during handling and storage taking account of likely temperatures and periods out of chill. Sampling plans shall include samples of product at the end of shelf life.

9.1.2 In respect of composition, authenticity and product description (e.g. allergens, nutritional values, fat content, etc.) suitable testing shall be carried out periodically on a frequency based on risk or to validate any claim.

9.1.3 The methods of analysis shall conform to recognised standards. The certificates of conformity from the laboratory shall stipulate the standard methods utilised and any departure from these standards. The certificates of conformance from the laboratory shall clarify which examinations are covered by the accreditation and which are excluded. Where the analysis involves the testing for *Listeria monocytogenes,* the test method shall be based on EN ISO 11290-1: 2017 for detection and BS EN ISO 11290-2:2017 for enumeration. Methods other than the analytical reference methods can be used provided alternative methods deliver equivalent results and the methods are validated appropriately.

9.1.4 The analysis shall be undertaken by a laboratory that has gained and maintained recognised laboratory accreditation, e.g. UKAS accreditation to ISO 17025 or CLAS (Campden accredited).

9.1.5 Where analysis is undertaken directly by Company personnel, the Company shall demonstrate that the personnel are suitably qualified and/or trained to carry out such work.

9.1.6 Where analysis is undertaken at the same location as the food production, the Company shall ensure the necessary controls are implemented and documented as part of the HACCP plan to prevent product, plant or personnel contamination.

9.1.7 Manufactured products that support the growth and multiplication of *Listeria monocytogenes* must be sampled as part of the sampling plan. The critical limit for levels of *Listeria monocytogenes* for manufactured products **must be set as absence in 25g.** Any product sample failing to meet this standard, including those taken by other parties, must be notified to Micron2 in accordance with the 'Micron2 Protocol for *Listeria monocytogenes* detections'. Any failed sample must be investigated, and corrective action recorded.

9.1.8 **For Storage & Distribution and Wholesale & Buyer/Broker operations** in the case of own label products, sampling shall be conducted on a risk-based frequency, in addition to that undertaken by the manufacturer/processor. Contracts with manufacturers of ready-to-eat foods that support the growth of *Listeria monocytogenes* shall include the requirement for environmental monitoring to be conducted. Sample results shall be made available by such contractors on request. Where sampling analysis is undertaken in-house by the manufacturer/producer, in the case of new product development on behalf of Storage & Distribution and Buyers & Broker/Wholesale operations (for own label products), independent analysis of samples shall be undertaken, and records maintained.

9.1.9 Manufacturers of ready-to-eat foods that support the growth of *Listeria monocytogenes* shall maintain an effective environmental monitoring programme that must include food processing equipment and food contact surfaces used for the manufacture of high-risk foods.

9.1.10 The Company shall have in place a detailed action plan to respond to any analysis testing sample failures. This shall include necessary training in the understanding of Listeria.

9.1.11 Where a product, ingredient, shelf-life test or environmental sample fails to meet the "physical", microbiological and/or chemical standards, necessary Company product recall protocols shall be instigated.

**9.2 Product Development**

9.2.1 The Company when developing new products shall undertake a risk assessment of raw materials and the production storage, transport or trading process to identify the likelihood of contamination by known allergens or the likelihood of loss of identify–preserved status, for example organic, gluten free etc., and shall put in place control measures to ensure product safety, legality and quality are maintained.

9.2.2 A hazard analysis study shall be undertaken covering all products and/or processes and final cooking instructions where applicable, during new product development in accordance with the principles of HACCP.

9.2.3 The Company shall ensure that personnel involved in the hazard analysis study have appropriate product specific knowledge and expertise for the development of an effective HACCP plan. Where resources are not available within the Company, expert advice shall be obtained from other sources.

9.2.4 Where appropriate, the Company will establish a trained multidisciplinary team to undertake the hazard analysis study.

9.2.5 The scope of the HACCP plan shall be identified. The scope shall describe which segments of the food chain are involved and the general classes of hazards to be addressed.

9.2.6 A full description of the product(s)/[processes shall be drawn up, including relevant safety information, for example, composition, physical/chemical structure and the inherent properties of the product (including water activity ($a_w$), pH, etc.), microcidal/static treatments (heat treatment, freezing, brining, smoking, etc.), packaging, durability and storage conditions. Where appropriate, the method of distribution must be defined e.g. chilled/frozen/ambient and vehicle expectations.

9.2.7 In developing the HACCP plan regard shall be given to the intended use of the product by the end user or consumer and if any special precautions shall be taken in respect of the increased risk to vulnerable groups, for example elderly care in hospitals and nursing homes.

9.2.8 A flow diagram shall be constructed by the HACCP team to cover all the steps and stages of the operation.

9.2.9 Confirmation of the flow diagram shall be undertaken during all process steps and stages and hours of operation to demonstrate it accurately reflects intended operational practice.

9.2.10 The HACCP team shall list all the hazards that may reasonably be expected to occur at each step and stage from receipt of raw materials and packaging, through storage and transportation, and trading until the point of consumption e.g. microbiological, physical, chemical and allergenic contamination. The HACCP team shall, by conducting a risk analysis, identify which hazards are of such a nature that their elimination or reduction to an acceptable level is essential to the production/storage/transportation and trading of safe and legal food.

9.2.11 The HACCP team shall, by the application of a decision tree, or such other method applicable to the type of product or production, or process determine which steps and/or stages are critical to food safety and legality.

9.2.12 For each identified Critical Control Point (CCP) the HACCP team shall establish a critical limit which shall be specified and validated.

9.2.13 The HACCP team shall establish scheduled measurement or observation to monitor each CCP relative to its critical limits. Such monitoring, shall be able to detect loss of control in a timely manner so that adjustments can be made

9.2.14 The HACCP team shall establish the corrective action specific to each CCP in order to deal with deviations when they occur and to ensure the CCP has been bought under control.

9.2.15 The HACCP team shall establish the procedures for periodic, and at least annual or after significant change in the product or processes verification of the HACCP/TACCP plan including, as appropriate:

- Review of the HACCP/TACCP system and its records
- Review of deviations and product dispositions
- Confirmation that CCPs are under control

9.2.16 The HACCP team shall establish documentation and record keeping appropriate to the HACCP principles and their application having regard to the nature and size of the business.

9.2.17 All records and documents developed that are to be associated with the monitoring of

CCPs shall be designed to be signed by the person(s) doing the monitoring and by a person responsible for the review of such documents and records.

9.2.18 The HACCP team shall, where appropriate, undertake factory or process trials and product testing to verify the HACCP, product formulation and manufacturing/storage/trading processes can producing/maintain a safe legal product.

9.2.19 Product shelf life shall be established, considering raw ingredients, product formulation, packaging, storage, distribution and the disposition of the end user or consumer. Shelf life trials shall be undertaken, and trial results documented and retained.

9.2.20 Whenever the product constituents, formulation processing or handling changes, the shelf life data shall be reviewed, and further shelf life trials undertaken to verify the shelf life.

9.2.21 Representative samples are to be stored and handled to reflect the reasonably foreseeable conditions of distribution, storage and use. Chilled products shall be stored during the shelf-life trials at 8°C and held for a period of four hours at ambient temperature prior to sampling for *Listeria monocytogenes*.

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9.2.22 A process for new product development with contracted manufacturers/producers shall be documented to include product development briefing, product review and final sign off.

9.2.23 A process for ensuring the contracted manufacturer/processor has included the new product within their HACCP system shall be implemented.

9.2.24 Where new product is developed by a contracted manufacturer/processor, the Company shall ensure that appropriate shelf life testing is completed and that records of shelf life test results are available.

9.2.25 Where new product is developed by a contracted manufacturer/processor, the Company shall ensure that products are appropriately labelled to comply with relevant legislation. A system of verification shall be implemented to ensure that labels are fully compliant.

9.2.26 Where new product is developed by a contracted manufacturer/processor, the Company shall ensure that appropriate information regarding allergenic ingredient content and nutritional information is made available within product specifications and on product labels.

**9.3 Product Security**

9.3.1 A threat analysis study (inclusive of vulnerability) (henceforth TACCP) shall be undertaken during the sourcing of suppliers, product development and/or sourcing/appointment of sub-contractors (in the case of wholesalers/buyers & brokers) in accordance with the principles of TACCP.

9.3.2 All products and/or processes shall have in place a comprehensive threat/vulnerability analysis in accordance with the principles of TACCP.

9.3.3 The Company shall ensure that personnel involved in the threat/vulnerability analysis study have appropriate product specific knowledge and expertise for the development of

an effective TACCP plan. Where resources are not available within the Company, expert advice shall be obtained from other sources.

9.3.4 Where appropriate, the Company will establish a multidisciplinary team to undertake the threat analysis study.

9.3.5 The scope of the TACCP plan shall be identified. The scope shall describe which segments of the food chain are involved and the general classes of hazards to be addressed.
A flow diagram shall be constructed by the TACCP team to cover all the steps and stages of the operation. The TACCP team shall list all the hazards that may reasonably be expected to occur at each step and stage from receipt of raw materials and packaging, through storage and transportation, and trading until the point of consumption e.g. fraud and malicious contamination from internal and external sources. The TACCP team shall, by conducting a risk analysis, identify which hazards are of such a nature that their elimination or reduction to an acceptable level is essential to the production/storage/transportation and trading of safe and legal food.

9.3.6 The TACCP team shall review the content of the TACCP plan on at least an annual basis. Records of such reviews shall be maintained.

9.3.7 In respect of sub-contracted services, the security arrangements of such subcontractors shall be reviewed prior to appointment and then on a risk-based frequency throughout the period of the contract.

## 10.0 ESTABLISHMENT: DESIGN AND FACILITIES

### 10.1 Location

10.1.1 The site shall be located and maintained to prevent contamination and enable the production of safe and legal products.

10.1.2 Establishments shall be in areas, which are free from objectionable odours, smoke, dust or other contaminations and are not subject to flooding.

10.1.3 All grounds within the site shall be finished and maintained to an appropriate standard.

10.1.4 Such roadways and areas serving the establishment, which are within its boundaries, shall be suitably surfaced, well maintained, provided with appropriate drainage and kept in a clean condition.

10.1.5 The site shall be appropriately registered with the enforcing authority concerned.

10.1.6 The site shall carry out a risk assessment on security of the premises and any threats to product through malicious attack or similar (this may be combined with the TACCP assessment).

### 10.2 Layout and Product Flow

10.2.1 Premises and plant shall be designed, constructed and maintained to control the risk

of product contamination and to comply with relevant legislation.

10.2.2 There shall be a map of the site showing access points for personnel, raw materials, routes of movement for raw materials, re-work and waste; location of staff facilities and production/process flows. The map will clearly show the high risk/care areas.

10.2.3 Buildings and facilities shall be of sound construction and maintained in good repair.

10.2.4 Working space shall be provided to allow for satisfactory functioning of all operations.

10.2.5 The design shall be such as to permit easy and effective cleaning and disinfection. The flow of cleaning and disinfection shall ensure that utensils etc. leaving the disinfection process enter a clean area fully protected against any source of recontamination.

10.2.6 The building and facilities shall be designed to prevent the entrance and harbourage of pests and the entry of environmental contaminants such as smoke, dust etc.

10.2.7 Building and facilities shall be designed to provide separation, by partition, location or other effective means, between those operations, which may result in, cross contamination or, in the case of meat, cross species contamination. Physical separation shall be achieved when handling raw and ready-to-eat foods.

10.2.8 Where for example, vacuum packing of ready-to-eat foods is carried out, the vacuum packing machine shall be in a designated area where there is no risk from cross contamination.

10.2.9 Buildings and facilities shall be designed to facilitate hygienic operations by means of a regulated flow in the process from the arrival of the raw material and packaging at the premises to the finished product and shall provide for appropriate temperature conditions for the processes and the product.

10.2.10 Buildings and facilities shall be so designed to protect raw materials and/or finished product from the weather during loading and unloading procedures.

**10.3 Fabrication (all food rooms)**

10.3.1 The fabrication of the site, buildings and facilities shall be suitable and appropriate for the intended use.

**10.3.2 Floors**

10.3.2.1 Floors shall be designed, constructed and finished to provide a surface which is waterproof, non-absorbent, cleanable, slip resistant as appropriate, without crevices and shall be easy to clean and disinfect.

10.3.2.2 Floors shall be designed to withstand cleaning materials and methods and to avoid standing water.

10.3.2.3 Where floor drainage is provided, floors shall have appropriate falls to the drains.

10.3.2.4 Floors and, where fitted, drainage shall be maintained in a good state of repair.

10.3.2.5 Floor drainage, where fitted, shall be designed to minimise the risk of product contamination, flowing from high risk /care to low, including the provision of trapped outlets.

**10.3.3 Walls**

10.3.3.1 Walls shall be designed, constructed and finished to provide a surface which is waterproof, non-absorbent, cleanable and light coloured, where appropriate.

10.3.3.2 Angles between walls, ceilings and floors shall be sealed and coved to facilitate cleaning.

10.3.3.3 Where walls are subject to damage from moveable equipment, protection shall be fitted to corners and other exposed areas.

10.3.3.4 Walls shall be designed to withstand cleaning materials and methods.

10.3.3.5 Walls shall be maintained in a good state of repair.

**10.3.4 Ceiling/Overheads**

10.3.4.1 Ceilings shall be designed, constructed and finished to prevent the accumulation of dirt and minimise condensation, mould development and flaking and shall facilitate cleaning.

10.3.4.2 Where a ceiling void is provided, access shall be provided to facilitate maintenance, cleaning and inspection for pest activity.

10.3.4.3 Ceiling shall be designed to withstand cleaning materials and methods.

10.3.4.4 Ceilings shall be maintained in a good state of repair.

10.3.4.5 Overhead structures and fittings shall be designed, constructed and installed in such a manner as to minimise product contamination either directly or indirectly and shall not hamper cleaning operations. They shall be designed and finished to prevent the accumulation of dirt and minimise condensation, mould development and flaking.

10.3.4.6 Open product shall be protected from contamination when it passes under or runs adjoining to staircases or walkways.

**10.3.5 Windows and Other Openings**

10.3.5.1 Windows and other openings in food rooms shall be designed and constructed to avoid accumulation of dirt and facilitate cleaning.

10.3.5.2 Where windows are designed to be opened for ventilation purposes, they shall be appropriately screened to prevent the entry of pests.

10.3.5.3 Where screens are fitted to openable windows, they shall be easily removable for cleaning and kept in a good state of repair.

10.3.5.4 Internal windowsills, if fitted, shall be sloped to prevent the use as shelves.

**10.3.6 Doors**

10.3.6.1 Doors shall have a smooth, non-absorbent surface and be designed to facilitate cleaning.

10.3.6.2 External doors shall be close fitting and appropriately proofed against the entry of pests.

10.3.6.3 External doors shall be kept shut when not in use, with self-closing devices fitted, where appropriate.

**10.3.7 Other Structures**

10.3.7.1 Stairs lift cages and auxiliary structures such as platforms, ladders, chutes, shall be so situated and constructed as to minimise the risk of product contamination.

10.3.7.2 Chutes shall be constructed with inspection and cleaning hatches.

**10.4 Services**

10.4.1 All services shall be designed, constructed and maintained to control the risk of product contamination.

**10.4.2 Water Supply**

10.4.2.1 An ample supply of potable water, under pressure and of suitable temperature shall be available with facilities for its storage, where necessary, and distribution and with appropriate protection against contamination.

10.4.2.2 The safety and quality of water, steam or ice that is used as a product ingredient or comes in contact with food or food handling or transportation equipment shall be regularly monitored based on risk; or at least annually to ensure that it presents no risk to product safety and meets specified quality and microbiological requirements.

**10.4.3 Effluent and Waste Disposal**

10.4.3.1 The facility shall have an efficient and effective effluent disposal system which shall always be maintained in good order and repair.

10.4.3.2 All effluent lines (including the sewer systems) shall be large enough to carry peak loads and shall be so constructed and located as to avoid the risk of contamination of water supplies, food production, handling and storage areas.

10.4.3.3 Appropriate systems shall be in place for the collation, collection and disposal of waste materials.

10.4.3.4 Appropriate facilities shall be provided for the storage of waste and inedible materials prior to removal from the facility. These facilities shall be designed to prevent access to waste or inedible material by pests and to avoid contamination of food, personnel, water supply, equipment, buildings or roadways on the premises.

10.4.3.5 Systems shall be in place to minimise the accumulation of waste in food rooms. As a minimum, at the end of production all waste will be removed from production areas.

10.4.3.6 Waste containers shall be clearly identified, suitably constructed to allow sanitisation, lidded and locked where necessary.

10.4.3.7 Waste and effluent disposal shall meet legislative requirements.

### 10.4.4 Compressed Air or Gas

10.4.4.1 Compressed air or gas that meets food, food equipment or packaging shall be regularly monitored (at least annually) and shall not present a risk to product safety, legality or quality.

### 10.4.5 Staff Facilities, Changing Facilities and Toilets

10.4.5.1 Staff facilities shall be designed and operated to minimise food safety risks.

10.4.5.2 Where specific workwear is required, changing facilities shall be provided for all personnel, including staff, visitors or contractors, prior to entry into food handling areas.

10.4.5.3 Where a high care or high-risk operation is undertaken, separate and specially designed changing facilities including hand washing facilities to prevent the introduction of contamination must be provided at the point of entry. Clear instructions for changing clothes and the order for changing in and out of, must be provided at the point of use.

10.4.5.4 In the case of raw meat, where different species are handled colour-coded aprons etc. must be provided to reduce the risk of cross species contamination.

10.4.5.5 Where appropriate, changing facilities shall be sited to allow personnel direct access, without recourse to any external area, to the food handling area.

10.4.5.6 Adequate toilets, including hand wash facilities shall be provided, designed to ensure hygienic removal of wastewater. These areas shall be well lit, ventilated and, where appropriate, heated.

10.4.5.7 Toilets shall not open directly into food rooms areas.

10.4.5.8 Hand washing facilities with hot and cold water or water at a suitably controlled temperatures, a suitable hand cleansing preparation and suitable hygienic means of drying hands, shall be provided in suitable locations (where relevant to be accessible by vehicle drivers).

10.4.5.9 Where paper towels are used waste receptacles shall be provided near to each washing facility.

10.4.5.10 Notices shall be displayed in toilets directing personnel to wash their hands after using the toilet.

### 10.4.6 Hand Washing Facilities in Food Rooms

10.4.6.1 Appropriately located facilities for hand washing and drying shall be provided wherever the process demands.

10.4.6.2 Hot and cold running water or running water at a suitably controlled temperature, a suitable hand cleaning preparation and suitable hygienic means of drying hands shall be provided.

10.4.6.3 Where paper towels are used waste receptacles shall be provided near to each washing facility.

10.4.6.4 Taps and dispensers shall be of the non-hand operative type and designed to meet the needs and risks of the food business / operation.

10.4.6.5 At entry points to food rooms and any other hand wash locations within such areas, facilities for hand disinfection shall be provided.

**10.4.7 Cleaning & Disinfection Facilities**

10.4.7.1 Facilities for cleaning and disinfection, where appropriate, of the structure, working implements and equipment shall be provided.

10.4.7.2 These facilities shall be constructed of corrosion resistant materials, capable of being easily cleaned and fitted with means of supplying a constant supply of hot and cold water or running water at a suitably controlled temperature.

10.4.7.3 Where appropriate, chemicals shall be automatically dosed to ensure the correct dilution.

10.4.7.4 Facilities shall be separated from production areas to minimise the risk of product contamination. Separate facilities and cleaning materials shall be provided for disinfection of equipment used for raw and ready-to-eat foods.

**10.4.8 Lighting**

10.4.8.1 Adequate natural and/or artificial lighting shall be provided throughout the establishment.

10.4.8.2 All light bulbs and fittings, (including clips and covers) and those on electric fly killer devices, shall be protected by shatterproof diffusers or sleeve covers, or fitted with shatterproof tubes or other suitable protection, where they present a risk of product contamination in the event of breakage.

**10.4.9 Air Conditioning/Ventilation**

10.4.9.1 Necessary ventilation shall be provided to prevent excessive build-up of heat, steam, condensation and dust and to remove vitiated / contaminated air from all areas including welfare facilities. Ventilation shall be designed to dry surfaces after wet cleaning.

10.4.9.2 The direction of the air flow within the establishment shall never be from a low risk to a high risk/high care area.

10.4.9.3 Ventilation openings, both internal and external, shall be provided with a screen or other protective covering of non-corrodible material and kept in good clean condition.

10.4.9.4 Screens, filters and ducting shall be easily removable/accessible for cleaning and maintenance.

10.4.9.5 Where appropriate, positive air pressure systems shall be in place.

**10.5 Equipment and Utensils**

10.5.1 Equipment (including pipes and ducts) and utensils shall be suitably designed for the intended purpose and shall be used to minimise food safety risks.

10.5.2 All equipment shall be properly specified before commission and shall be constructed, maintained, serviced and operated to produce safe and legal product.

10.5.3 All equipment shall be so positioned or be mobile to provide access for cleaning and servicing. Where equipment cannot be moved then procedures must be in place to allow for a suitable cleaning in place to be carried out.

10.5.4 Under no circumstances shall it be considered safe to use the same complex equipment such as vacuum packing machines, slicers, mincers, etc for both raw and ready-to-eat foods.

10.5.5 Separate chopping boards and utensils shall be used for raw and ready-to-eat foods.

10.5.6 Where different species of meat are handled separate equipment shall be provided or effective sanitation in place, including the use of colour-coded bins or containers.

10.5.7 All equipment and utensils used in food rooms which may meet food shall be made of material which does not transmit toxic substances, odour or taste, is non- absorbent, is resistant to corrosion, and is capable of withstanding repeated cleaning and disinfection. Surfaces shall be free from pits and crevices and the use of exposed nuts and bolts shall be prohibited. Wooden equipment shall not be utilised.

10.5.8 The use of different materials in such a way that contact or chemical corrosion can occur shall be avoided.

**10.6 Maintenance**

10.6.1 A system of planned preventative maintenance shall be in place covering all items of equipment, filters, screens and utensils which are critical to product safety, legality and quality.

10.6.2 The building, equipment, utensils and all other physical facilities in the establishment, shall be maintained in good repair and in an orderly condition.

10.6.3 The safety and legality of product or product in production shall not be jeopardised during maintenance operations.

10.6.4 Tools for maintenance or equipment adjustment which are stored in production areas shall either be kept on a shadow board or a locked toolkit when not in use. High care tools shall not be used / stored within low care areas and vice versa. Care shall be taken to ensure tools are always replaced after use and periodic checks are undertaken to ensure all tools are correctly stored and maintained clean.

10.6.5 When a machine or line is out of use for maintenance work, a sign or signs shall be clearly displayed to inform personnel. Documented Hygiene clearance checks (between maintenance and production) following repair / maintenance shall be in place.

10.6.6 Only food grade lubricants (with necessary allergen statements) shall be used on machinery where there is a likelihood of food contamination/is designed to process foods. This includes compressors used to produce compressed air in contact with food.

**10.7 Housekeeping, Cleaning and Hygiene**

10.7.1 Appropriate standards of housekeeping, cleaning and disinfection shall always be maintained to ensure that the equipment and environment are maintained in a hygienic condition.

10.7.2 The Company shall ensure that cleaning and disinfection procedures are in place that will ensure effective removal of *E. coli O157* and other pathogens from all surfaces and equipment involved in food preparation and storage.

10.7.3 In order to ensure the adequate disinfection of surfaces, the Company shall utilise disinfection products that meet as a minimum the specifications of one of the following standards: BS EN 1276 or BS EN 13697.

Where a sanitiser is utilised to achieve disinfection a two-stage approach shall be utilised. Manufacturer's instructions for dilution, application method and contact time must be followed.

10.7.4 Where commercial grade dishwashers are utilised for small equipment the water tank shall maintain a rinse cycle water temperature of at least 82°C and provide a contact time of at least 15 seconds.

10.7.5 Cleaning practices shall be undertaken to minimise the risk of product contamination using dedicated cleaning tools. Separate cleaning materials for use in high care/risk areas shall be provided and used correctly, and materials for use in such areas shall be stored in designated areas accessible by staff in a way that ensures that their clothing and hands are not contaminated when storing or removing materials.

10.7.6 A permanent cleaning schedule shall be drawn up for each establishment, service, plant and equipment to ensure that all areas are appropriately cleaned, and that critical areas, equipment and materials are designated for special attention and/or disinfection /sanitation. The schedule/documented routine as appropriate shall identify the responsibilities, the minimum frequency the area or equipment to be cleaned, the method to be used, the chemicals to be utilised, concentrations, health and safety requirements and protective clothing to be worn.

10.7.7 Cleaning standards shall be monitored and verified by appropriate management and records maintained.

10.7.8 The effectiveness of the cleaning and sanitation procedures shall be verified and recorded. The frequency of such verification checks shall be defined based on risk.

10.7.9 Cleaning chemicals shall be fit for purpose, food grade, clearly labelled and used in accordance with the manufacturer's instructions.

10.7.10 Bulk cleaning chemicals, cleaning materials and other potentially hazardous substances shall not be stored in a food room, preferably in a secure storage area. Large drums used for siphon feed to dishwashers shall be securely capped with drum securely fitted to prevent spillage. Cleaning chemicals for daily use shall not be stored near food and/or packaging to prevent a risk of contamination. Bulk stored cleaning chemicals shall not be stored above food, preferably in bunded location.

10.7.11 Appropriate precautions shall be taken to prevent product from being contaminated during the cleaning or disinfection operations. Any residues of these agents on a food contact

surface shall be removed by thorough rinsing, before the area or equipment is again used for handling food, unless the agent is specifically verified acceptable for food contact.

10.7.12 Appropriate cleaning equipment shall be provided, maintained in a clean condition and a good state of repair. Where appropriate, equipment shall be colour coded according to the area or task. Wooden equipment shall not be utilised.

**10.8 Pest Control**

10.8.1 There shall be an effective and continuous programme for the prevention, control and eradication of pests which shall be undertaken by suitably trained and competent personnel. All staff shall be trained in the recognition of pests pertinent to their tasks.

10.8.2 Establishments shall be regularly inspected for evidence of infestation and to identify any proofing works necessary to prevent the entry of pests.

10.8.3 Should pests gain entrance to the establishment, eradication measures shall be instigated. Control measures involving treatment with chemical, physical or biological agents, shall only be undertaken by or under the direct supervision of personnel who have a thorough understanding of the potential hazards which may arise. Safety data sheets shall be available on site for all pesticides utilised.

10.8.4 Where bait boxes, traps or other control measures are placed within the establishment or surrounding area, regular checks on these and an up to date plan of all such locations shall be maintained. Such equipment shall be tethered and not be placed so that it presents a risk of product contamination (non-toxic in food preparation areas).

10.8.5 Where electric fly killers and pheromone traps are provided, they shall be sited to ensure effective operation and placed to avoid contamination of product or packaging. They shall be regularly emptied, cleaned and tubes and/or sticky boards to the electric fly killers replaced when necessary. Electric fly killers shall be switched on.

10.8.6 Raw materials, packaging and product, during all stages of production to finished product and storage, shall be stored to minimise the risk of infestation. Product shall be stored away from walls and off the floor to allow for pest control inspections and treatment as necessary.

10.8.7 Incoming raw materials and packaging shall be thoroughly inspected on arrival for the absence of pest infestation and reflected in monitoring records. Second hand or reconditioned machinery shall be inspected for the absence of pest infestation prior to installation.

10.8.8 Drains, downpipes and ventilation pipes shall, where appropriate, be fitted with screens, balloons and water traps to prevent the entry of pests.

10.8.9 Where equipment is vulnerable to infestation regular inspections shall be undertaken to determine absence of infestation. Obsolete equipment shall be either removed from the premises or suitably stored and monitored to reduce the risk of infestation/harbourage.

10.8.10 Records shall be maintained of all inspections, infestations or sightings, treatments, etc. and details of any housekeeping or proofing works required. In the case of the latter, action taken by the Company shall be recorded and signed off on completion.

10.8.11 Periodically and at least annually, the records and results of inspections, etc. shall be reviewed to identify any trends. Records of the review shall be maintained.

## 11.0 PERSONNEL: HEALTH AND HYGIENE REQUIREMENTS

### 11.1 Training

11.1.1 The Company shall ensure that all employees are appropriately trained, instructed and supervised in food safety principles and practices, commensurate with their work activity.

11.1.2 Those responsible for the development and maintenance of the HACCP plan shall receive adequate training in the application of the HACCP principles.

11.1.3 A documented standard of training for all employees who come into contact with food, food equipment or enter a food room shall be maintained, specifying requirements in respect of induction, subsequent and refresher training.

11.1.4 All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and subsequently at a level commensurate with their work activity and be appropriately supervised throughout the working period.

11.1.5 Where relevant, drivers and other appropriate personnel shall receive training in maintaining vehicle load security.

11.1.6 Records of the training received by each member of staff to be maintained up to date.

11.1.7 Periodically, and when there are significant changes to the product, process or HACCP/TACCP, results of investigations; the training programme, methods of training and its application in the work environment shall be reviewed and any necessary modification or changes made to the programme.

### 11.2 Health Screening

11.2.1 The Company shall ensure that medical screening procedures are in place for all employees, visitors and contractors, who will be working in or visiting areas where product safety could be compromised.

11.2.2 Persons who come into contact with food, food equipment or enter food rooms shall, prior to employment, complete a medical questionnaire, which shall be examined by a competent person to determine suitability for the food handling tasks. If appropriate a medical examination shall be undertaken.

11.2.3 Food handlers returning to work after sickness or returning from a trip abroad shall, where appropriate, complete a review medical questionnaire to ensure their suitability for the food handling tasks; and that they have not had contact with persons suffering from food poisoning symptoms.

11.2.4 The management shall take care to ensure that no person, whilst known or suspected to be suffering from, or to be a carrier of a disease likely to be transmitted through or on food; or while afflicted with infected wounds, skin infections, sores or with diarrhoea or vomiting, is permitted to work in any food handling area in any capacity in which there is any likelihood

of such a person directly or indirectly contaminating food with pathogenic micro-organisms. A documented procedure shall be in place and notified to all appropriate personnel to ensure that any person so affected shall immediately report the matter to the management.

**11.3 Injuries**

11.3.1 Any person who has a cut or wound shall not continue to handle food or food contact surfaces until the injury is completely protected by a waterproof covering which is firmly secured, and which is conspicuous in colour. Appropriate first-aid facilities shall be provided for this purpose.

11.3.2 In cases where metal detection facilities exist waterproof covering for injuries shall include a metal detectable strip. Metal detectable plasters used for cuts and grazes shall be tested through a metal detector.

**11.4 Washing of Hands**

11.4.1 Any person, while on duty in a food handling area, shall wash their hands frequently and thoroughly with a suitable hand cleaning preparation (liquid hand wash that has disinfectant properties conforming to the standard BS EN 1499:2013) with hot and cold water or running water at a suitably controlled temperature. Hands shall always be washed before commencing work, immediately after using the toilet, after handling contaminated material and whenever else necessary. After handling any material, which might be contaminated with food poisoning bacteria (for example, after handling packed or unpacked raw meat and before handling packed or unpacked cooked meat), hands shall be washed and disinfected immediately. Notices requiring hand washing shall be displayed. There shall be appropriate training and supervision to ensure compliance with this requirement.

11.4.2 Hands shall not come into contact with taps after hand washing is completed.

11.4.3 The effectiveness of hygiene procedures with regard to hands shall be checked and verified periodically (with hand swabs as necessary) with the frequency of checks based on risk.

11.4.4 Gloves, if used in the handling of food product, shall be maintained in a sound, clean and sanitary condition. Where appropriate, gloves shall be coloured to aid detection. The wearing of gloves does not exempt the food handler from having thoroughly washed hands. Gloves shall be changed whenever dirty, damaged or where they may present a risk of product contamination.

11.4.5 Where hygienic hand rubs are utilised to BS EN 1500, they shall not replace effective hand washing.

**11.5 Personal Cleanliness/Protective Clothing**

11.5.1 Every person entering a food handling area shall maintain a high degree of personal cleanliness and shall at all times while so engaged wear suitable Company issued protective clothing including, where applicable, head covering and footwear, all of which articles shall be cleansable unless designed to be disposed of and shall be maintained in a clean damage free condition, consistent with the nature of the work in which the person is engaged. Clear instructions shall be displayed for staff to follow when putting on protective clothing to ensure that food safety is not compromised

11.5.2 Where the facility includes both low risk and high risk/high care operations, clearly distinguishable protective clothing shall be provided between the different risk areas so as to reduce the risk of cross contamination.

11.5.3 For high risk/high care operations clean protective clothing shall be located at the point of entry into the high risk/high care area(s). On leaving the high risk/high care area protective clothing shall always be removed in the designated changing area even when leaving to utilise the toilet or staff facilities.

11.5.4 Protective clothing, including headwear and footwear, shall be stored so that at no time is there the potential for contamination from outdoor clothing, shoes, etc. removed by the operative.

11.5.5 Laundering of protective clothing shall either be undertaken in-house or by an approved contractor. Suitable controls shall be exercised during the laundering process to ensure that at no time is the protective clothing exposed to a risk of contamination. In the case of in-house facilities, the facilities shall be maintained separate from food handling areas and present no risk of contamination to food products or ingredients.

11.5.6 Food contact disposable clothing shall be discarded after each use.

11.5.7 Head covering/hairnets/snoods shall be detectable with necessary procedures in place to dispose/change according to risk.

11.5.8 All hair shall be fully contained to prevent product contamination, with necessary supervision / reflective surfaces provided at dressing for checking. Beards and moustaches shall be contained in a snood.

11.5.9 Smoking, including electronic vaping, shall only be permitted in designated areas which shall be clearly labelled, compliant with local regulations and sited away from food rooms.

11.5.10 Protective clothing both washable and disposable (high and low risk) shall not be worn outside of food rooms, for example during smoking or eating. Low risk clothing specific to task (engineering or warehouse) may be worn externally subject to risk assessed dress procedures applied.

11.5.11 Suitable footwear pertinent to the risk, shall, at all times, be worn within all food rooms/distribution areas.

### 11.6 Jewellery, Nail Varnish, etc.

11.6.1 The Company shall have a policy which clearly specifies the type of jewellery allowed to be worn for ethnic, medical or religious reasons and the controls in place to effectively minimise the risk of contamination.

11.6.2 Persons engaged in handling open food shall not wear jewellery or watches other than one-piece plain sleeper earrings and/or a plain band ring. Such jewellery shall be kept in a good state of repair and clean. In respect of body piercing and studs an assessment of the risk of product contamination shall be undertaken and necessary controls instigated.

11.6.3 Fingernails shall be kept short, clean and unvarnished. Where an individual has exposed nail coatings / false fingernails the company shall make necessary arrangements to protect open food.

11.6.4 Excessive make up including false eyelashes, perfume or aftershave shall not be worn and make up shall be limited so as to reduce the risk of product contamination.

### 11.7 Personal Behaviour

11.7.1 Any behaviour which could result in contamination of food, such as eating, drinking, use of tobacco, chewing, hand to mouth contact or any unhygienic practices, including spitting, shall be prohibited in food handling/storage areas.

11.7.2 Eating and drinking shall only be permitted in designated areas. Suitable storage facilities shall be provided, if appropriate, for personnel to store personal food and drink so that it is not introduced into production or changing areas.

11.7.3 Personal items including car keys, mobile phones or accessories, bags, etc. shall not be brought into food production areas where there is a risk of product contamination.

### 11.8 Visitors and Contractors

11.8.1 Precautions shall be taken to prevent visitors and contractors to food handling areas from contaminating food**.** These shall include, where necessary, the provision of protective clothing and completion of a medical questionnaire and adoption of Company rules as to personal hygiene.

### 11.9 Supervision

11.9.1 Responsibility for ensuring compliance by all personnel with all requirements of this section shall be specifically allocated to competent supervisory personnel.

## 12.0 PRODUCT CONTROL

### 12.1 Physical, Chemical and Biological Contamination Risk

12.1.1 Appropriate facilities and procedures shall be in place to prevent, as far as reasonably practicable, the risk of physical, chemical or biological contamination of product.

12.1.2 The structure and equipment shall be maintained in a good state of repair in order to prevent the risk of physical contamination of product.

12.1.3 Maintenance work shall be undertaken with care in order to prevent the risk of physical contamination of product. At the conclusion of any maintenance work, procedures shall be in place to ensure that no product contamination risks exist.

12.1.4 Any glass or brittle materials (Perspex/plastic) forming part of the structure and/or food processing equipment, where there is a potential risk of product contamination, shall be recorded on a glass/brittle material (Perspex/plastic) register which shall be maintained up to date.

12.1.5 Where a glass/brittle material (Perspex/plastic) register is maintained, inspections shall be carried out to assess the state of the glass or brittle Perspex at a frequency determined by risk assessment.

12.1.6 Any glass windows above or adjoining areas where open food is being handled shall be protected against breakage.

12.1.7 Where glass, brittle materials (Perspex/plastic) or glass bottle packaging presents a possible risk of product contamination by breakage, a documented policy shall be in place for the action to be taken in the case of breakage.

12.1.8 A record shall be retained of all glass or brittle materials (Perspex/plastic) breakages that posed a risk of product, packaging or machinery contamination.

12.1.9 The use of wooden equipment or wood within the structure, where it presents a possible risk of product contamination, shall be eliminated or controlled.

12.1.10 Where wooden pallets are used by suppliers or for finished product each pallet shall be suitably lined to present a barrier between the wood and the food contact packaging of the product.

12.1.11 Wooden pallets shall be inspected before use, whilst in storage areas and post use for any damage which may result in physical contamination. Any damaged pallets shall be removed from storage and production areas where they present a risk of product contamination.

12.1.12 Wooden pallets shall not be permitted in food production areas.

12.1.13 Procedures shall be in placed to prevent contamination and cross contamination of raw materials, packaging, and product in production and finished product.

12.1.14 The Company shall ensure appropriate controls are put in place to eliminate or minimise the risk of metal or other physical contamination (for example stones from the field, stalks, and insects).

12.1.15 The Company shall identify the need for metal or other detection equipment as part of their HACCP assessment. The HACCP assessment shall identify those steps or stages which are critical and establish critical limits for detection having regard to the nature of the food and the process.

12.1.16 Where metal detection is used the Company shall document the procedures for corrective action, machinery adjustment, calibration, periodic testing (including any auto reject systems) and record keeping. These shall include the quarantine and re-testing of all product passed through the detector since the last acceptable test and the control and destruction of the rejected product.

12.1.17 Where product is automatically rejected into a bin or other such container the container shall be kept locked during production periods and only opened by authorised personnel to remove or assess rejected product.

12.1.18 Where the detector incorporates a belt stop an audible or visual alarm shall be fitted. The rejected product shall be removed to a secure container which shall be clearly labelled as

non-conforming product to prevent any misuse of the product.

12.1.19 Where in-line detectors incorporate the deflection of the rejected product to a separate container, the container shall either be colour coded or clearly labelled as non-conforming product to prevent any misuse of the product.

**12.2 Goods In/Storage**

12.2.1 All deliveries (including packaging) shall be inspected by a competent person to ensure that they meet the product specification including necessary risk-based assessment of product to identify substitution or fraud controls. Any non-conforming product shall be clearly identified and segregated in a designated area and prevented from unintended use, for example stored lockable cages.

12.2.2 In respect of temperature sensitive deliveries, the temperature shall be taken using a suitable calibrated thermometer, sanitised as appropriate, and the temperature recorded.

12.2.3 Records of delivery checks shall be maintained. Receipt documentation and product labelling shall facilitate traceability and stock rotation.

12.2.4 Items shall be stored under such conditions that shall preclude the contamination with and/or proliferation of micro-organisms and protected against deterioration of the product or damage to the container/packaging. Facilities shall provide protection to ingredients, packaging and final products from dusts, weather, condensation, drains or waste.

12.2.5 During storage, periodic inspection shall take place to ensure fitness for human consumption, stock rotation is maintained, and that product is utilised in sequence.

12.2.6 In respect of temperature sensitive items, a documented system shall be in place to demonstrate effective temperature control during the delivery acceptance procedure and storage.

**12.3 Product Handling**

12.3.1 Where raw materials are handled which are known allergens, care shall be exercised at all stages and steps of the process to eliminate the risk of product cross contamination.

12.3.2 In high risk/high care areas where there is a risk of microbiological contamination or bacterial multiplication, the processing and handling of food in these areas shall be appropriate to minimise the risk of product contamination or bacterial multiplication.

12.3.3 Where a finished product is labelled to indicate freedom from an allergen or the product holds a special designation, for example organic, religious product certified, vegetarian or plant-based product; validated documented procedures shall be implemented and verified to ensure the prevention of product contamination.

12.3.4 Where cooked meat products (or ready to eat products) are stored, handled or processed, separation from raw meat shall be maintained at all times.

**12.4 Stock Management**

12.4.1 Procedures shall be in place to ensure materials and products are used in the correct order and within the allocated shelf life, ensuring that the shelf-life extends beyond the shelf-life of the finished product, where appropriate.

12.4.2 Product labelling shall facilitate correct stock rotation. Product decanted from its original packaging will be clearly labelled to facilitate correct stock rotation.

12.4.3 Decanted product shelf life shall be determined according to the suppliers coding and considering the method and location of subsequent storage.

12.4.4 Storage bins/containers shall only be utilised for the storage of product with the same batch code/date code to facilitate correct stock rotation and traceability.

**12.5 Non-conforming Product**

12.5.1 The Company shall ensure that all out of specification raw materials, product in production, finished product and packaging is identified, quarantined and clearly labelled. This shall extend to returned products from customers.

12.5.2 In the case of finished product subject to approval for release, a clear system of labelling or stock location shall be utilised to indicate product awaiting release and released product.

12.5.3 In the case of product subject to scanning or detection equipment for the detection of physical contamination a clear system of labelling or stock location shall be utilised to indicate product subject to scanning or detection since the last satisfactory test of the equipment.

12.5.4 All non-conforming product shall be handled or disposed of in accordance with Company documented procedures by authorised personnel and is only handled for disposal by registered contractors.

12.5.5 Where a non-conforming product is subject to disposal or for alternative use, for example animal feed, the Company shall ensure that appropriate steps are taken to ensure that the product cannot re-enter the food chain. Where product is considered for release to charitable outlets necessary controls and consents shall be provided including removing own label information where applicable.

12.5.6 Where appropriate, corrective action shall be taken to avoid a reoccurrence of non-conformance. A record of corrective action shall be maintained.

**12.6 Product Labelling**

12.6.1 Product shall be clearly and correctly labelled in accordance with current legal requirements.

12.6.2 Each container shall be embossed or otherwise permanently marked in code or in clear to indicate the producing factory and the lot. Individual/bulk packs shall be traceable to source and where applicable carry the following information:

a. Product description
b. An appropriate indication of durability

c. The date and place of packing
d. Identification codes
e. Recommended storage temperature and/or conditions
f. Allergen details
g. Nutritional information
h. Pre-packed product weight/quantity (where appropriate)
i. Validated cooking instructions

12.6.3 Product which can support the growth of *Listeria monocytogenes* **shall** display a recommended storage temperature of 5°C or below. The Company may specify a temperature below 5°C.

**12.7 Packaging**

12.7.1 All packaging shall be appropriate for the product to be packed and for the expected conditions of storage/use and shall not transmit to the product any objectionable substances.

12.7.2 Packaging shall be stored under conditions, which shall minimise the risk of contamination and deterioration. Food contact wrapping and packaging materials for ready-to-eat foods shall be stored in a designated clean area designed to protect it from cross-contamination and accessible by staff in a way that ensures their clothing and hands are not contaminated when loading or removing materials.

12.7.3 Packaging shall be removed from any outer wrapping, boxes, etc. away from food rooms so as to eliminate the risk of contamination.

12.7.4 Once decanted any containers which will be directly in contact with food shall either be stored in closed blue plastic bags or inverted so as to eliminate the risk of contamination. Similar controls shall be exercised in respect of lids, caps or covers.

12.7.5 Any part used packaging materials shall be suitably protected from the risk of contamination having been removed from the packing line prior to the next product run as applicable.

12.7.6 Product containers shall not be used for any purpose which may lead to contamination of the product. Where appropriate, containers shall be inspected immediately prior to use to ensure that they are in a satisfactory condition.

12.7.7 Only packaging materials required for immediate use shall be kept in the packing or filling area.

12.7.8 Where cooked meat products (or ready to eat products), as well as raw meat are supplied, product shall be suitably packaged so as to prevent the spillage of blood or cross contamination.

**12.8 Product Release**

12.8.1 The Company shall ensure that product is only released by authorised personnel who shall observe and verify all release information.

## 13.0 PRODUCTION

### 13.1 Production Control

13.1.1 The Company shall maintain and operate procedures that are capable of producing consistent safe, legal and quality products from raw ingredients assembly to finished product packing.

13.1.2 All stages in the storage and production process shall be performed without unnecessary delay and under conditions which shall prevent the possibility of contamination or deterioration of, or the development of proliferation of micro-organisms in the raw ingredients, intermediate and/or finished product.

13.1.3 Where temperature and/or time control of raw materials, intermediate and/or finished product, process and/or environment is critical to product safety, legality and quality, this shall be controlled, monitored and recorded having regard to the risk. Where electronic monitoring is utilised it shall monitor, at an appropriate, frequency, the process/product status and be linked to a suitable failure alarm system.

13.1.4 Production shall be in accordance with the Company Food Safety Management System and HACCP assessment. Ongoing process validation and verification shall be undertaken in accordance with these systems to demonstrate control of critical issues in respect of safety, legality and quality issues.

13.1.5 Appropriate supervision by technically competent personnel shall be maintained at all times.

13.1.6 Equipment and utensils utilised in a high risk/high care production area shall be clearly distinguishable from similar equipment and utensils utilised in low risk areas.

13.1.7 Separate equipment and utensil cleaning and disinfection facilities shall be provided for a high risk/high care production area and a low risk area.

13.1.8 Where raw meat of different species is processed separate preparation areas and equipment shall be maintained at all times. Where, due to the size of the operation, this cannot be achieved, separation shall be achieved by time and a deep clean and disinfection to be undertaken before a different species is processed. Surface testing shall be undertaken to validate the effectiveness of the cleaning and disinfection process and cleaning protocols shall extend to personnel and associated work wear.

13.1.9 The processing of carcases, offal, cuts or trimmed horse meat is not permitted in production or preparation areas utilised for other species of meat.

## 14.0 DISTRIBUTION

### 14.1 Transport Vehicles

14.1.1 All vehicles used shall be suitable for the purpose, shall be fully functioning, in good repair and maintained in a clean and hygienic condition. Good repair shall extend to rear shutter doors, tail lifts, lashing points, load supports and lock strips on vehicles and fastenings for curtain sided vehicles. Where hoses or other devices are fitted for the

loading/unloading of food and food related products, these shall be fitted with functional covers/caps.

14.1.2 Hygiene procedures for vehicles and all its attachments and fittings, shall be documented and records maintained.

14.1.3 Procedures for the maintenance of vehicles including Mechanical Handling Equipment (MHE) shall be documented and records maintained of any maintenance conducted including statutory registration and examinations. Where vehicles are provided via contracted services, the expected maintenance should be documented in the agreement maintained with the service provider.

14.1.4 All vehicles including Mechanical Handling Equipment (MHE), containers, etc. used for transporting food shall be free from infestation, odours, potential foreign bodies / materials, oil and grease and accumulation of dirt or debris.

14.1.5 Temperature-controlled transport shall be capable of maintaining product temperatures within specification.

14.1.6 Temperature controlled transport shall either: incorporate temperature data logging devices which can be interrogated or provide a printout to confirm the time/temperature conditions throughout the transportation process, or a system shall be in place to validate the temperature of the product regularly (at delivery) throughout the transportation process. In respect of product which can support the growth of *Listeria monocytogenes* the temperature shall be 5°C or below.

14.1.7 Procedures shall be in place in the event of a vehicle or refrigeration unit breakdown. All such incidents shall be recorded, including details of the corrective action taken in respect of the food product. In the case of temperature failure, procedures shall be in place to establish the safety status of the product prior to further deliveries.

14.1.8 Maintenance materials (e.g. petroleum, oil, lubricants (POL) etc.) for transport or mechanical handling equipment / vehicles shall not be stored in an area where food is stored or handled.

14.1.9 Hand washing or as a minimum hand sanitising facility (to BSEN 1500) shall be provided on vehicles to ensure hand cleanliness after handling raw meat and before handling cooked meat (or ready to eat products).

14.1.10 Where tankers are used for food or other vulnerable items, a history of the loads carried shall be maintained with records demonstrating suitable cleaning (and disinfection as necessary) between loads.

### 14.2 Transport & Loading Conditions

14.2.1 Where raw and cooked meat products (or ready to eat products) are supplied, separation shall be maintained during picking and loading so as to eliminate the risk of cross contamination.

14.2.2 Where the material to be transported is susceptible to weather damage, vehicles shall be loaded and unloaded in covered or docking bays.

14.2.3 The food product shall be transported under conditions that shall preclude the contamination with and/or proliferation of micro-organisms, and protect against physical and chemical contamination, deterioration or damage to the container/ packaging, as applicable. Primary food contact packaging must not be in direct contact with the vehicle floor.

14.2.4 Where returns, non-conforming product and/or food complaint samples are returned on a delivery vehicle a secure non-conforming quarantine storage facility shall be provided on the vehicle or all products shall be clearly labelled and segregated to eliminate the risk of product contamination, mistaken delivery or re-issue.

14.2.5 In respect of the use of cages, etc. for mixed product transportation, care shall be exercised to ensure the cage is clean, stable when loaded and product is not subject to damage or contamination risk during transportation.

14.2.6 Where a vehicle is used to transport raw and processed products, procedures shall be implemented to prevent cross contamination.

**14.3 Vehicle & Load Security**

14.3.1 Following the undertaking of the security risk/threat assessment (TACCP), procedures shall detail control measures for identified hazards and detail what steps are to be taken to prevent load contamination. Procedures are to be documented.

14.3.2 Vehicles shall be secured to prevent unauthorised access to the cargo, during the loading process or when left in areas where there is a risk to load security or the drivers cab when not in use and when loaded.

**14.4 Transport Sundry Equipment**

14.4.1 All transport equipment, including forklift trucks, cages, trolleys etc. shall not present contamination risks to product.

14.4.2 A procedure shall be documented for the monitoring of the condition of equipment such as knives, scissors, pallets etc. that may present the risk of product contamination.

14.4.3 Racking, shelving or sundry shelving units (where present) shall be inspected according to risk and maintained in a suitable condition.

## 15.0 DEFINITIONS

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| **Accreditation** | Procedure by which an authoritative body gives formal recognition of the competence of a certification body to provide certification services, against a standard or normative document. |
| **Accreditation Body** | Agency having jurisdiction to formally recognise the competence of a certification body to provide certification services. |
| **Allergen** | Food causing an adverse reaction that is mediated by an immunological response. |
| **Analysis** | Laboratory and/or "in house" measurement or assessment. |
| **Audit** | A systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives. |
| **Broker** | Agent or dealer with no ownership of the product. |
| **Buyer** | Purchaser of finished products for onward sale to customer for further processing. |
| **Certification** | Procedure by which accredited certification bodies, based on an audit, provide written or equivalent assurance that food safety management systems and their implementation conform to requirements. |
| **Certification Body** | Provider of certification services, accredited to do so by an accreditation body. |
| **Certification Standard** | A normative document, established by consensus and approved by a recognised body, that provides, for common and repeated use, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context. |
| **Certification System** | A system that has its own rules of procedure and management for carrying our certification. |
| **Cleaning** | The removal of soil, food residues, dirt, grease or other objectionable matter. |

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| **Client** | Customer of the certification body responsible for organising the due diligence processes on behalf of the clients. |
| **Company** | The person, firm, Company or other entity who has a contract with the client to supply food products. |
| **Contamination** | The occurrence of any objectionable matter in the product. |
| **Control Measure** | Any action and activity that can be used to prevent or eliminate a food safety hazard or reduce it to an acceptable level. |
| **Critical Control Point** | A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level. |
| **Disinfection** | The reduction, without adversely affecting the food, by means of hygienically satisfactory chemical agents and/or physical methods, of the number of micro-organisms to a level that will not lead to harmful contamination of food. |
| **Distribution** | The transportation of goods by road in any container. |
| **Establishment** | Any building(s) or area(s) in which food is handled and the surroundings under the control of the same management. |
| **Food Intolerance** | A detrimental reaction, often delayed, to a food, beverage or food additive or compound in food, that produces symptoms in one or more body organs and systems, but is not a true food allergy. |
| **Food Related Products/Items** | Includes any product or item, including packaging likely to come into direct contact with the food in the manufacture, distribution and supply chain. |
| **Food Rooms** | Any room where food or food related products are delivered into, stored, handled, prepared, processed, packaged or distributed. |
| **Food Sensitivity** | An adverse reaction in humans either caused by allergens or as a result of food intolerance. The following foodstuffs and products derived from them are considered to be allergens or causing food intolerance:<br>• Peanuts<br>• Tree nuts (almonds, brazils, chestnuts, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios, walnuts)<br>• Eggs<br>• Fish<br>• Cow's milk (including lactose)<br>• Crustacea, molluscs,<br>• shellfish<br>• Sesame seeds<br>• Soya<br>• Sulphite<br>• Cereals containing gluten (wheat, rye, barley, oats, spelt or their hybridised strains)<br>• Celery<br>• Mustard<br>• Lupin |

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| **Hazards** | A biological, chemical or physical agent in, or in contact with food, with the potential to cause an adverse health effect. |
| **HACCP Hazard Analysis And Critical Control Point System** | A system which identifies, evaluates and controls hazards, which are significant for food safety. |
| **High Care** | An area or operation designed to minimise product contamination from microbiological hazards during the handling of foods which have undergone a cook or similar process to achieve a 6 log reduction for listeria. High care foods are cooked or processed foods intended as ready to eat. |
| **High Risk Area** | An area where there is a high risk of contamination or where the risk of growth from any contamination is high, thereby posing a risk to health. The area must be physically segregated, designed to a high standard of hygiene, where practices relating to personnel, ingredients, equipment, packaging and environment aim to prevent product contamination by micro-organisms. |
| **High Risk Food** | Ready to eat foods that support the growth of pathogens. |
| **High Risk Operation** | An operation where there is a significant risk of contamination of ready to eat product by micro-organisms, thereby posing a risk to health. The processing or handling of food in these areas must be appropriate to prevent product contamination by micro-organisms |
| **Hygiene** | Means all measures to ensure the safety and wholesomeness of food during preparation, processing, manufacture, packaging, storage, transportation, distribution, handling and supply. |
| **Inspection** | Examination of systems for control of food safety, in order to verify that they conform to requirements. |
| **Low Risk Operations** | An operation where the processing or handling of foods presents least or minimum risk of product contamination or growth of micro-organisms, or where the subsequent processing or preparation of the product by the consumer will ensure product safety. |
| **Lot** | Means a definitive quantity of commodity produced under essentially the same conditions. |
| **Non-Conformance** | Deviation of product or process from specified requirements, or the absence of, or failure to implement and maintain, one or more required management systems elements, or a situation which would, on the basis of available objective evidence, raise significant doubt as to the conformity of what the supplier is supplying. |
| **Packaging Material** | Any containers such as cans, bottles, cartons, boxes, cases and sacks, or wrapping and covering material such as foil, film, metal, paper, wax paper and cloth. |
| **Pest** | Any animal or insect capable of directly or indirectly contaminating Food. |

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| **Primary Production** | Food product that is similar in nature to its natural state, but may have been:<br>• Packed<br>• Washed<br>• Trimmed (not cut into pieces)<br>• Undergone any process not defined under the definition of "processed food" |
| **Processed Food** | Food product, which has undergone any of the following processes:<br>• Aseptic filling, Baking, Bottling<br>• Brewing<br>• Canning<br>• Coating/ breading/ battering<br>• Cooking<br>• Curing<br>• Cutting/slicing/dicing<br>• Distillation<br>• Extrusion<br>• Fermentation<br>• Freeze drying<br>• Freezing<br>• Frying<br>• Hot filling<br>• Irradiation<br>• Microfiltration<br>• Microwaving<br>• Milling<br>• Packing & Repacking<br>• Packed in modified atmosphere<br>• Pasteurisation / sterilisation<br>• Pickling<br>• Roasting<br>• Smoking<br>• Steaming<br>• Packing in vacuum |
| **Product Specification** | Criteria set down in a conforming standard related to food safety |
| **TACCP/VACCP Threat Assessment Critical Control Point** | Threat or vulnerability assessment a method, partly similar in tools and techniques to those used with HACCP, that assesses hazards and risks to the business, process or product from attack for malicious purposes, fraud, or gain for individuals or groups at the expense of the targeted organisation. |
| **Wholesaler** | A distributor or middleman who purchases products to sell mainly to retailers, institutions or other companies rather than to consumers. |
| **Wholesale Exclusive Products** | Products not bearing the wholesaler's logo but produced with a brand exclusively for sale and distribution by the wholesaler. |
| **Wholesaler Own Brand** | Products bearing a wholesaler's logo, copyright and address that are legally regarded as the responsibility of the wholesaler. |

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