



STS
food safety

CODE OF PRACTICE AND TECHNICAL STANDARD

*STS Food Safety Standard
For food suppliers & distributors*

All food version

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Part of the **ELAS** group of companies



Employment Law • Health & Safety • Food Safety • Occupational Health
Absence Management • Health Surveillance • Training • Payroll

FOREWORD

This code of practice has been specifically created to set an audit standard for food manufacturers, distributors or buyers/agents who are supplying food and/or food related products to caterers and retailers. This code 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 environment.

This latest version of the Code of Practice has been updated in conjunction with key stakeholders and certified suppliers. It is the opinion of STS that this code of practice must set the standard as to 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. Further, 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 fully implemented and operated at all times.

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.

This 2018 version has amended governance processes detailed within which will help ensure that a consistent approach to certification processes is achieved at all times. Further, 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 standard has been produced to encapsulate all varieties of food manufacture, distribution and wholesale/brokerage. As detailed within the standard, there are sections included that may not be relevant to all businesses which as a further improvement upon previous versions of this standard are clearly identified in separate published versions as to which business type they are relevant to.

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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 Code of Practice and Technical Standard are to:
 - Enhance food safety
 - Ensure consumer protection
 - Strengthen consumer confidence and
 - Improve cost effectiveness through the food supply chain
- 1.3 The Code of Practice and Technical Standard have been developed with the participation of technically competent personnel of interested parties and has been subject to formal review by the Independent Committee of STS.
- 1.4 The Code of Practice and Technical 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 Code of Practice will be available upon request from STS. Certified food processors and suppliers will be notified by email of any update of the Codes of Practice and are recommended to download a copy for their records.
- 1.6 Compliance with the Code of Practice 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 be demonstrated at all times.
- 1.7 Auditors, employed by STS, 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 and this will be arranged by the STS auditor as part of the auditing process.
- 1.8 A copy of this Code of Practice and Technical Standard shall be held on site by the supplier.
- 1.9 The operative date of this issue of the Standard is 1st August 2018.

1.1 THANKS & ACKNOWLEDGEMENTS

STS would like to take the opportunity to thank persons involved in the independent review and subsequent production of this Code of Practice Standard. Special thanks go to:

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2.0 SCOPE OF STANDARD

- 2 This standard has been developed to cover all activities which may affect food safety, quality and legality of products being manufactured and/or stored and/or distributed and/or purchased through wholesale/agents & brokerage operations.

3.0 SCOPE OF AUDITED COMPANY OPERATIONS

- 3.1 The standard applies 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/agent/brokerage (see section 5.0) but the certification scope and certification documents should reflect that no manufacturing or storage and distribution operations have been directly 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 products and food related products, which may be:
 - 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 agent and brokerage operations for food and food related products

Certificates will include one or more of the above scopes, as appropriate.

4.0 SCOPE OF APPLICABLE PRODUCTS

- 4.1 The scope covered by this Standard is for all food that is manufactured/produced. The scope is also for food products and/or food related products that are stored and distributed or purchased through a wholesale or agent/broker operation for consumption within catering and 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 Code of Practice has 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	✓	✓	✓ (clauses highlighted in red are N/A)	Partial
12	✓	✓	✓ (clauses highlighted in red are N/A)	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 should be included in the audit process to confirm management control of the process. This is particularly relevant for Agents & 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 instructions an introduction pack will be sent to the food supplier. The application form and terms of business should 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), where appropriate, and food hygiene, Food Standards Agency report, where appropriate, and 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 activity being undertaken by the applicant
- The product risk factor
- 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 and product range
- The number of employees/size of operation.

6.3. Following review of site details the applicant will be advised on the duration of the audit, the proposed scope and fees. The audit date cannot be booked until full payment or a purchase order number has been received. Expected audit durations 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/Agents & Brokers operation	1 day

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

6.4. Renewal of certification will include re-audit visits, which shall be executed at a maximum frequency of 12 months (unless 6.5 is relevant).

6.5. 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. with regard to *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

6.6. An additional audit visit may be required in the event of the supplier notifying STS of any of the following circumstances:

- Relocation to new premises
- Modifications to the certified process
- New processes/products
- Outstanding non-conformances
- Product recall, withdrawal or incident
- Client request
- Significant complaint notification/significant complaint trend
- Legal prosecution

Notification would be acceptable via email, letter, telephone call or third party communication

6.7. The audit shall ensure that the supplier has in place documentation and systems and can 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 demonstrate commitment to ensuring and maintaining compliance with the requirements of this Standard at all times.

6.8. Expected standard audit duration are detailed in 6.3. 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. In

respect of the report preparation, audit notes, sign off of any non-conformities and responding to issues post-audit a minimum off-site duration shall be 3.5 hours (½ day). This shall be applied to each audit within the timeframes highlighted in 6.3.

- 6.9. In the event that 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 STS. STS shall take appropriate steps to assess the situation and any implications for the certification and to take any appropriate action.
- 6.10. In the event that the Company becomes aware that pathogens including *Listeria monocytogenes* are detected in food and environmental samples, whether taken by the Company or another party, the Company shall immediately notify STS, and where appropriate the local authority, and keep STS informed in respect of the proposed corrective action and re-sampling results. STS shall take appropriate steps to assess the situation and any implications for the certification and to take any appropriate action.
- 6.11. In the event of a product recall, withdrawal or incident, the Company shall inform the local authority, Food Standards Agency and STS immediately of the situation and provide details relating to the incident. STS 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. Additionally, certified suppliers shall notify STS without delay of any of the following:
- Relocation to new premises
 - Modifications to the certified process
 - New processes/products
 - Outstanding non-conformances
 - Significant complaint notification/significant complaint trend
 - Legal prosecution
- 6.12. Prior to the commencement of the audit, an opening meeting will be held with nominated management from the Company to:
- Introduce the auditor and company representatives
 - Ensure the scope, coverage 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.
 - (It is appreciated that the audit programme may need to be altered for unannounced audits).
- 6.13. Throughout the audit of the operation the Company Quality Assurance/Technical Manager or other appropriate manager should accompany the auditor.
- 6.14. 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 agreed at the opening meeting
 - Confirm the position with regard to any observations made to the supplier's representatives during the audit.
 - Clearly provide in writing any non-compliance's noted during the audit against the standard.

- Summarise the overall acceptability of the operation in the light of the non-compliances found thereby indicating the severity of those non-compliances. 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-compliances against an appropriate timescale and agree follow up and confirmation of corrective actions (“appropriate” timescale will take into account the nature of the work and the ease of achieving compliance), e.g. cleaning/not completing records – immediate. It shall also be advised that the proposed timescale for action of any non-conformities raised during the audit commences from the date of audit. Where appropriate, agree the date of the next audit.

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-conformity as being critical, major or minor in nature

6.15 The auditor will assess the nature and significance of any non-conformity

There are three levels of non-conformity:

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.

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.

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.

6.16 In respect of critical non-conformities the Company shall not gain certification. There shall be a full on-site re-evaluation carried out to demonstrate compliance, at the Company’s expense.

6.17 In respect of major non-conformities, for all audit evaluations, major non-conformities 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-conformities, or where evidence can only be demonstrated on site, a further on-site re-evaluation visit shall be necessary to demonstrate compliance, at the applicant Company’s expense.

6.18 In respect of minor non-conformities these shall normally be completed within 28 days to ensure certification. A certificate shall not be issued until the Company has provided satisfactory objective evidence.

6.19 Where evidence is not provided within the set time period, STS shall deem the non-conformities as not addressed and certification shall not be granted. In order to achieve certification, a full on-site re-audit shall be required at the Company’s expense.

6.20 The Certification Body (STS) shall, after consideration of the auditor’s written report (Appendix A) advise the Company of the status awarded on the following basis:

Approved

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-conformities raised during the audit have been corrected within 28 days of the date of the audit.

Not Approved

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 (critical)

6.21 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.

6.22 Certification may be withdrawn or suspended in the following circumstances:

- (a) failure to progress re-evaluation in a timely manner
- (b) critical non-conformity
- (c) failure to provide objective evidence in respect of non-conformities, or arrange re-evaluation to assess compliance, 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
- (h) failure to notify STS in respect of legal action or product recall, withdrawal or incident
- (i) where enforcement authorities are preparing/taking legal action
- (j) product contamination

6.23 Following each evaluation a written report shall be sent to:

- (a) one copy to the nominated company representative
- (b) one copy to each public sector agency, as appropriate
- (c) on demand by any NHS Trust, education authority, public sector procurement body, hospital etc.
- (d) to enforcement authorities, as required

6.24 Following the initial evaluation under this Code of Practice the certificate expiry date will be the appropriate evaluation frequency plus 42 days, which shall allow time for compliance with any subsequent non-conformity.

6.25 The re-evaluation 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.

- 6.26 The evaluation report and associated information shall be stored safely and securely for a period of at least five years by STS.
- 6.27 Whilst the certificate is issued to the Company, it remains the property of Support, Training & Services Limited and must be returned on request.
- 6.28 If certification is withdrawn, suspended or not maintained, the Company must withdraw from displaying the certificate and remove all reference from publicity material, etc.
- 6.29 Where certification is not achieved during initial evaluation audits or subsequent surveillance visits, STS shall notify relevant supplier STS assessment clients listed for the Company of the audit failure.
- 6.30 Products produced, stored or distributed under this Code of Practice and Technical Standard shall not be labelled, marked or described in a manner, which implies that they meet this standard.
- 6.31 Support, Training & Services Limited 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 5 years relevant industry experience and/or 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 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 witness audits and must be recorded.
- 7.2.4 Auditors must complete a minimum of one observed and one successful witnessed audit by a Lead Auditor which will be documented in training records.

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 STS internal training sessions on at least an annual basis.
- 7.3.5 New auditors to the STS Code of Practice for Suppliers to the Public Sector shall complete one successful witnessed and one successful assessed audit prior to undertaking unaccompanied audits. Witness and accompanied audits shall be completed by Lead Auditor trained personnel. A record of both audits shall be completed and maintained.

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 for the particular fields for which they are considered 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 be undertaken, 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 should 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 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 particular 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.
- 8.1.7 The Company shall incorporate into their food safety management system (or provide a separate document), a clearly defined and documented quality management system incorporating a quality policy statement, which shall state the company's intentions to meet its obligations to produce quality products that meet safety and legal requirements.
- 8.1.8 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.
- 8.1.9 The Company's senior management shall review the effectiveness of the food safety and quality management system at appropriate planned intervals, 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 policy and the quality policy.

8.1.10 Verification checks shall be undertaken to demonstrate that the documented procedures are working reliably. Verification shall be undertaken periodically at frequencies sufficient 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.

8.1.11 The Company shall maintain and have available a copy of the most up to date version of the STS Code of Practice & Technical Standard for Food Suppliers and Distributors.

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, authorised and regularly reviewed, 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 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

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 should 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 brought 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 should 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 should 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-conformity and shall clearly detail corrective actions necessary.

8.9 Control of Non-conformity

- 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-conformity procedures shall extend to include a procedure/policy for the receipt/acceptance of customer returns/rejected deliveries.

8.9.2 Any non-conforming product, whether identified on the Company premises or returned from customers must be held in a location that does not preclude the quality, safety or 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/agents overseas, whether services are provided directly or contracted out.

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 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.

8.11.7 The Company shall ensure that procedures for the control of any sub-contracted services, which impact upon product safety, legality and quality are prepared and documented and that such documentation is securely stored and readily accessible when needed.

8.11.8 Performance of sub-contractors shall be monitored. Where contractual requirements are not being met, appropriate corrective action shall be taken. Any such corrective action shall be documented.

8.11.9 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, at any stage of processing, production, distribution and any out sourced 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 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.

8.12.3 In respect of meat and fish products traceability is to be available to the manufacturer back to the farm/source and at least annually, according to risk, a traceability exercise back to the farm/source is to be undertaken at least annually.

8.12.4 The traceability system must be tested at least annually with such tests being fully documented.

ADDITIONAL for WHOLESALERS/BUYERS & BROKERS ONLY

8.12.5 In respect of product wholesalers/agents & 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. Periodically, according to risk, or at least annually, the Wholesaler/Agents & Broker should request from their supplier/manufacturer a traceability exercise back to the farm/source.

8.12.6 Records of supplier traceability check requests in respect of meat and fish products should be maintained along with relevant detailed reports of the exercise completed by the supplier.

8.12.7 Product specifications must be available which clearly detail packaging and labelling requirements for each product sourced. Specifications must be reviewed at least annually and updated as necessary and records of updates completed maintained.

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 must be securely stored and readily accessible when needed.

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 yearly) 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 so as 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 immediately notify STS, the relevant Local Authority and the Food Standards Agency.
- 8.14.6 Comprehensive documentation of any product withdrawal or recall is to be maintained, including the minutes/action notes of the recall/incident team, notices issued to the press, customers, etc., product supplied, customers supplied, product accounted for and the method of disposal and verification of such action.

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
- 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 document the measuring and monitoring devices requiring calibration and the frequency of calibration to assure product safety, legality and quality.
- 8.15.5 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 with regard to *Listeria monocytogenes* the shelf-life testing shall reflect the temperatures stored in client premises, including four hours storage in ambient conditions. Tests should also be undertaken to demonstrate the outcome of temperature abuse during storage by the customer.

For Storage & Distribution and Wholesale & Buyer/Broker operations, arrangements shall be agreed for the manufacturer/producer to implement an appropriate sampling plan. This shall extend to product and environmental sampling. Records of all testing shall be made available. Where sampling analysis is undertaken in-house by the manufacturer/producer, in the case of new product development on behalf of Storage & Distribution and Agents & Broker/Wholesale operations, independent analysis of samples shall be undertaken and records maintained.

- 9.1.2 In respect of composition, authenticity and product description (e.g. content, nutritional values, fat content, etc.) testing should be carried out periodically (frequency based on risk) according to risk or to validate any claim.
- 9.1.3 The 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.
- 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. The certificates of conformity from the laboratory should clarify which examinations are covered by the accreditation and which are excluded.
- 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 The Company shall establish products and ingredients specifications to include, “physical” properties, microbiological standards, food standards, quality and composition standards, where appropriate, having regard to any legislative requirements and good manufacturing practice.
- 9.1.8 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. Any product sample failing to meet this standard, including those taken by other parties, must be notified to STS immediately.

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.

- 9.1.9 Manufacturers of ready-to-eat foods that support the growth of *Listeria monocytogenes* shall maintain an effective environmental monitoring programme.

For Storage & Distribution and Wholesale & Buyer/Broker operations, contracts between 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.

- 9.1.10 The Company shall have in place a detailed action plan to respond to any analysis testing sample failures.
- 9.1.11 Where a product, ingredient, shelf-life test or environmental sample fails to meet the “physical”, microbiological and/or chemical standards, the Company shall document the control and disposal of the product(S) concerned, the corrective action and the steps taken to prevent a reoccurrence and contact the Local Authority and Food Standards Agency, where appropriate along with any contract suppliers. Full details and corrective action must be notified to STS, at the earliest opportunity.

9.2 Product Development

- 9.2.1 A hazard analysis study shall be undertaken during product development in accordance with the principles of HACCP.
- 9.2.2 All products and/or processes shall have in place a comprehensive hazard analysis 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 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 should 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 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 corrective action specific to each CCP in order to deal with deviations when they occur and to ensure the CCP has been brought under control.
- 9.2.15 The HACCP team shall establish 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 associated with the monitoring of CCPs shall 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 are capable of producing/maintaining a safe legal product.
- 9.2.19 Product shelf life shall be established, taking into account raw ingredients, product formulation, packaging, storage, distribution and the disposition of the end user or consumer.
- 9.2.20 It is vital that representative samples are stored and handled to reflect the reasonable foreseeable conditions of distribution, storage and use. Chilled products should 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*.
- 9.2.21 Shelf life trials shall be undertaken and trial results documented and retained.
- 9.2.22 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.
- 9.2.23 The Company 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.

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

- 9.2.24 A process for new product development with contracted manufacturers/producers shall be documented to include product development briefing, product review and final sign off.
- 9.2.25 A process for ensuring the contracted manufacturer/processor has included the new product within their HACCP system shall be implemented.
- 9.2.26 Where new product development is conducted on 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.
- 9.2.27 Where new product development is conducted on by a contracted manufacturer/processor, the Company shall ensure that appropriate products are appropriately labelled to comply with relevant legislation. A system of verification shall be implemented to ensure that labels are fully compliant.
- 9.2.28 Where new product development is conducted on 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 shall be undertaken during the sourcing of suppliers, product development and/or sourcing/appointment of sub-contractors in the case of wholesalers/agents & brokers in accordance with the principles of TACCP.
- 9.3.2 All products and/or processes shall have in place a comprehensive threat analysis in accordance with the principles of HACCP.
- 9.3.3 The Company shall ensure that personnel involved in the threat 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.
- 9.3.6 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. 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.

- 9.3.7 The TACCP team shall review the content of the TACCP plan on at least an annual basis. Records of such reviews shall be maintained.
- 9.3.8 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 so as to prevent contamination and enable the production of safe and legal products.
- 10.1.2 Establishments shall be located 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.

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 Buildings and facilities shall be of sound construction and maintained in good repair.
- 10.2.3 Working space shall be provided to allow for satisfactory functioning of all operations.
- 10.2.4 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.
- 10.2.5 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.
- 10.2.6 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.
- 10.2.7 Where for example, vacuum packing of ready-to-eat foods is carried out, the vacuum packing machine shall be located in a designated area where there is no risk from cross contamination.

10.2.8 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.

10.2.9 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 should 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, 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 should 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 so as 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 window sills, 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 (at least annually or based on risk) 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 at all times 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 and 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 should 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 comes into contact with 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 so as 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 must be provided at the point of entry.
- 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 waste water. 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 so as 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 contaminated air. Ventilation should 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.

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

10.4.10.4 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 so as 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 so as to provide access for cleaning and servicing. Where equipment cannot be moved then procedures must be in place to allow for cleaning in place to be carried out suitably.

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 come into contact with 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 nuts and bolts should be prohibited.

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 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. 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.
- 10.6.6 Only food grade lubricants shall be used on food contact machinery surfaces.

10.7 Housekeeping, Cleaning and Hygiene

- 10.7.1 Appropriate standards of housekeeping, cleaning and disinfection shall be maintained at all times 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 1276:1997
 - BS EN 13697:2001
- Where a sanitiser is utilised to achieve disinfection a two stage approach shall be utilised, the sanitiser used in both stages of the cleaning and disinfection process.
- 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 so as 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 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 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 should 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. Cleaning chemicals for daily use shall not be stored in close proximity to food and/or packaging so as to present a risk of contamination. Bulk stored cleaning chemicals shall not be stored above food, preferably in banded 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.
- 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 correctly sited, regularly emptied and cleaned and tubes and/or sticky boards to the electric fly killers replaced when necessary. EFK 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 so as 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 Records of the training received by each member of staff to be maintained up to date.
- 11.1.6 Periodically, and when there are significant changes to the product, process or HACCP/TACCP, 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, while 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 water proof 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 regularly 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 European standard BS EN 1499:1997) 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 should be checked and verified periodically 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.
- 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 Disposable clothing shall be discarded after each use, including hairnets or mob hats.
- 11.5.7 Hairnets shall, in the case of metal detection, be detectable. The hairnet shall be regularly tested (at least weekly) through a metal detector and records kept.
- 11.5.8 All hair shall be fully contained to prevent product contamination.
- 11.5.9 Gloves, if worn, shall be subject to appropriate control to avoid product contamination.
- 11.5.10 Smoking, including electronic vaping, shall only be permitted in designated areas which shall be clearly labelled and sited away from food rooms
- 11.5.11 Protective clothing shall not be worn outside of food rooms, for example during smoking or eating, when there is a risk of product or packaging contamination.
- 11.5.12 Beards shall be contained in a snood.
- 11.5.13 Suitable footwear 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 Every person 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 Nail varnish shall not be worn by staff handling open food.
- 11.6.4 Excessive make up, perfume or aftershave shall not be worn and make up shall be limited so as to reduce the risk of product contamination.
- 11.6.5 Fingernails shall be kept short, clean and unvarnished. Any type of false fingernails shall not be permitted.

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, such as 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, Biological and Metallic 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 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 Perspex/plastic register which shall be maintained up to date.
- 12.1.5 Where a glass/brittle 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 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 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, should be replaced or eliminated.
- 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 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 place to prevent contamination and cross contamination of raw materials, packaging, and product in production and finished product.
- 12.1.14 In high risk/high care areas where there is a risk of microbiological contamination or bacterial proliferation, the processing and handling of food in these areas shall be appropriate to minimise the risk of product contamination or bacterial proliferation.
- 12.1.15 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).
- 12.1.16 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.
- 12.1.17 The Company shall document the procedures for corrective action, machinery adjustment, calibration, periodic testing 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.

12.1.18 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.

12.1.19 Where the detector incorporates a belt stop an audible or visual alarm shall be fitted.

12.1.20 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.

12.1.21 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 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 should be clearly identified and segregated in a designated area and prevented from unintended use, for example stored in 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 should 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 system shall be in place to demonstrate effective temperature control during the delivery 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 Where a finished product is labelled to indicate freedom from an allergen or the product holds a special designation, for example organic, Halal, product certified or vegetarian, documented procedures shall be implemented to ensure the prevention of product contamination.

12.3.3 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 taking into account 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 by registered contractors.
- 12.5.5 Where 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.
- 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 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:
 1. Product description
 2. An appropriate indication of durability
 3. The date and place of packing
 4. An identification code
 5. Recommended storage temperature and/or conditions
 6. Allergen details
 7. Nutritional information
- 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

- 11.7.1 Packaging shall be inspected on delivery to ensure that it meets the product specification. Packaging outside of the specification shall be quarantined and clearly labelled as non-conformity product.
- 12.7.2 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.
- 12.7.3 Packaging shall be stored under conditions, which shall minimise the risk of contamination and deterioration. 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.
- 12.7.4 Packaging shall be removed from any outer wrapping, boxes, etc. away from food rooms so as to eliminate the risk of contamination.
- 12.7.5 Once decanted any containers which will be directly in contact with food shall either be stored in 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.
- 12.7.6 Any part used packaging materials shall be suitably protected from the risk of contamination.
- 12.7.7 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.
- 12.7.8 Only packaging materials required for immediate use shall be kept in the packing or filling area.
- 12.7.9 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 all release procedures.

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 steps or stages in the 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 horse carcasses, offal, cuts or any processed 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, maintained 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, shall be documented and records maintained.
- 14.1.3 Procedures for the maintenance of vehicles shall be documented and records maintained of any maintenance conducted including statutory 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, containers, etc. used for transportation shall be free from infestation, odours, potential foreign bodies, oil and grease and accumulation of dirt or debris.
- 14.1.5 Refrigerated or temperature controlled transport shall be capable of maintaining product temperatures within specification.
- 14.1.6 Refrigerated or temperature controlled transport shall 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 throughout the transportation process.
- 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 equipment (e.g. oil, petrol, etc.) for transportation shall not be stored in an area where food is handled.
- 14.1.9 Hand washing or hand sanitising facilities 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 In respect of temperature sensitive food products a system shall be in place to demonstrate effective temperature control at all stages, including picking, loading and transportation. In respect of product which can support the growth of *Listeria monocytogenes* the temperature shall be 5°C or below.
- 14.2.3 Where the material to be transported is susceptible to weather damage, vehicles shall be loaded and unloaded in covered or docking bays.
- 14.2.4 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.
- 14.2.5 Where returns, non-conforming product and/or food complaint samples are returned on a delivery vehicle a secure storage facility shall be provided on the vehicle or all products shall be clearly labelled and segregated to eliminate the risk of product contamination or re-issue.
- 14.2.6 In respect of the use of cages, etc. for mixed product transportation, care shall be exercised

to ensure the cage is stable when loaded and product is not subject to damage or contamination during transportation.

14.2.7 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 Vehicles shall be secured to prevent unauthorised access to the load or the drivers cab when not in use and when loaded. Procedures should detail potential risks from security hazards and detail what steps are to be taken to prevent load contamination. Procedures are to be documented.

14.3.2 Loads are not to be left unattended during the loading process or left in areas where there is a risk to load security.

14.3.3 Drivers and other relevant personnel shall receive training in maintaining load security. All training shall be documented.

14.4 Transport Sundry Equipment

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

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 (where present) shall be maintained in a suitable condition. This shall extend to any shelving provided either to racking or to sundry shelving units.

15.0 DEFINITIONS

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

Agent

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

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 out certification

Cleaning The removal of soil, food residues, dirt, grease or other objectionable matter

Company The person, firm, Company or other entity whom has a contract with the Public Sector to supply food products

Contamination The occurrence of any objectionable matter in the product

Contract

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:

- Peanuts
- Tree nuts (almonds, brazils, chestnuts, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios, walnuts)
- Eggs
- Fish
- Cow's milk (including lactose)
- Crustacea, molluscs, shellfish
- Sesame seeds
- Soya
- Sulphite
- Cereals containing gluten (wheat, rye, barley, oats, spelt or their hybridised strains)
- Celery
- Mustard
- Lupin

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 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 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 Conformity 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

Primary Production Food product that is similar in nature to its natural state, but may have been:

- Packed
- Washed
- Trimmed (not cut into pieces)
- Undergone any process not defined under the definition of "processed food"

Processed Food

Food product, which has undergone any of the following processes:

- Aseptic filling
- Baking
- Bottling
- Brewing
- Canning
- Coating/breading/battering
- Cooking
- Curing
- Cutting/slicing/dicing
- Distillation
- Drying
- Extrusion
- Fermentation
- Freeze drying
- Freezing
- Frying
- Hot filling
- Irradiation
- Microfiltration
- Microwaving
- Milling
- Mixing/blending
- Packing & Repacking
- Packed in modified atmosphere
- Pasteurisation /sterilisation
- Pickling
- Roasting
- Smoking
- Steaming
- Packing in vacuum packing

Product Specification

Requirements	Criteria set down in a conforming standard related to food safety
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TACCP Threat Assessment Critical Control Point	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.
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Wholesaler



Any enquiries regarding this standard should be directed to:

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