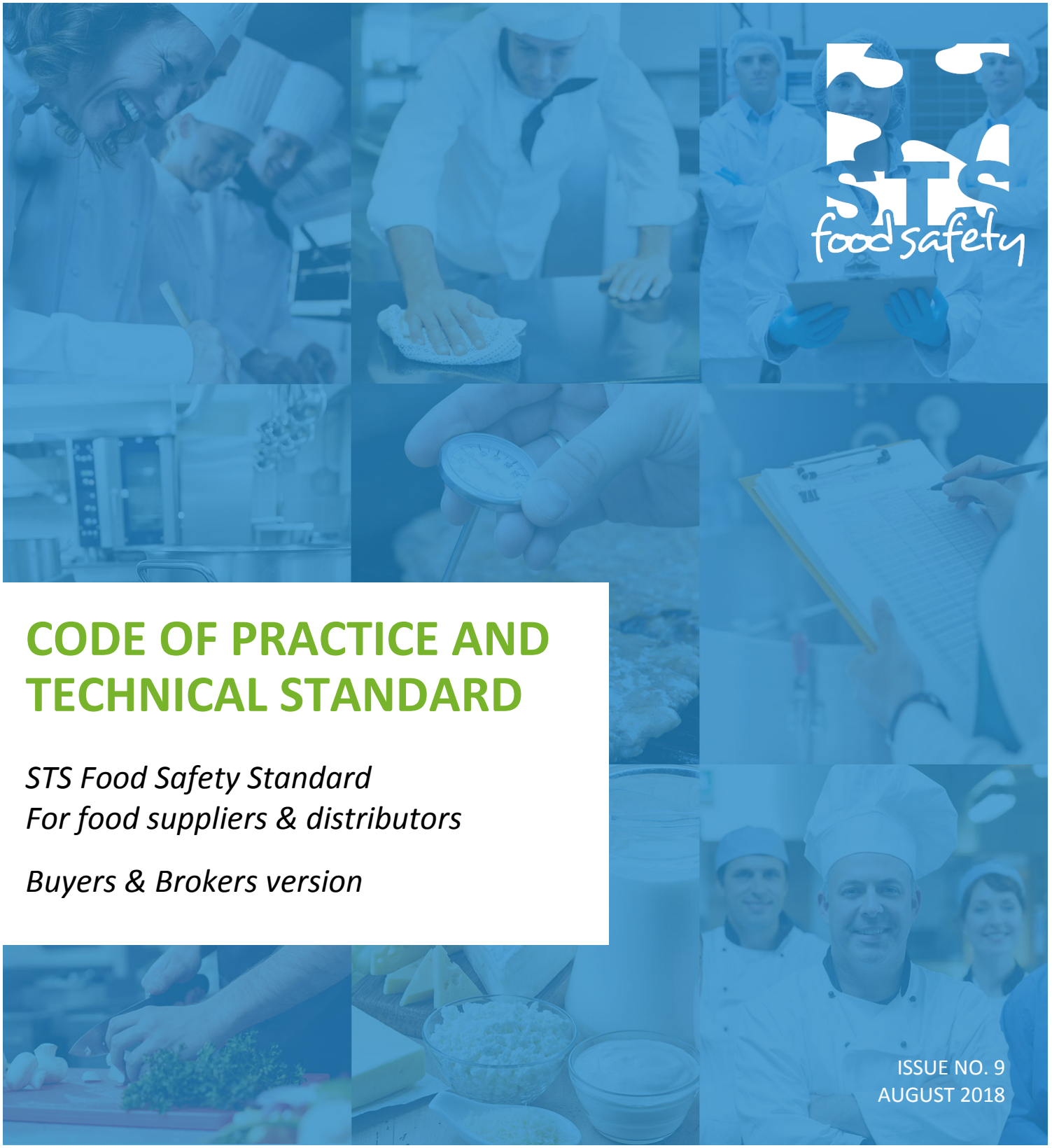

CODE OF PRACTICE AND TECHNICAL STANDARD

STS Food Safety Standard
For food suppliers & distributors

Buyers & Brokers version

ISSUE NO. 9
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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 as 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.

Any enquiries regarding this standard should be directed 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:

Graham Fish	NHS Supply Chain
Alan Sayanyi	Maple Fine Foods
Alison Preston	Compass
John Piggott	Total Produce
John Pearce	ISS UK
Pam Beha	UKAS

2.0 SCOPE OF STANDARD

1.3 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/ Agents & Brokers
1-7	✓	✓	✓	✓
8	✓	✓	✓	✓
9	✓	✓	✓	✓
10	✓	✓	✓	
11	✓	✓	✓	Partial
12	✓	✓	✓	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

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 safety 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 being 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 – Buyers & Brokers version.

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 bought to the attention of the management responsible for the activity audited, for necessary action.

8.7.4 Any corrective actions required following an internal audit 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.

8.9.3 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

8.11.1 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.

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.

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.

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.

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.

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 bought 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 8ºC 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.

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.

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.

11.1.5 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.

12.0 PRODUCT CONTROL

12.3 Product Handling

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.

12.5 Non-conforming Product

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.

12.5.6 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:

a) Product description
b) An appropriate indication of durability
c) The date and place of packing
d) An identification code
e) Recommended storage temperature and/or conditions
f) Allergen details
g) Nutritional information

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

12.7 Packaging

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.

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 our 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
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.
Wholesaler	

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