

Version 1.3 ©



Salt Association PO Box 125 Kendal Cumbria LA8 8XA United Kingdom

telephone: ++ 44 (0)15395 68005

Email: info@saltinfo.com

web site: http://www.saltassociation.co.uk

SaltAS Salt Assurance Scheme

CONTENTS			<u>page</u>
1	THE 1.1 1.2 1.3 1.4 1.5	The Principles of SaltAS	1 1 1 1
2	OPEI 2.1 2.2 2.3 2.4 2.5 2.6 2.7 2.8	Application for Certification to SaltAS & the Associated Process Updates to SaltAS Standard Quality Management . Implementation of SaltAS Quality Management Structure Service Providers Documentation Requirements . Record Keeping.	2 2 2 2 2 2 3 3
3	3.8 3.9 3.10 3.11 3.12 3.13	Resources & Good Hygienic Practice Resources – Edible Salt Products Personnel Job Descriptions Hygiene Facilities Hygiene Facilities – Edible Salt Products Health & Safety Raw Material Intake Process Control Conveying Equipment Production facilities & equipment . Technical Additives & Process Aids . Sieves Screens, Filters& Separators, Magnets & Metal Detectors Reprocessing Storage Facilities	4 4 5 5 5 5 6 6 6 6 6 7 7 7 7 8
4	4.1 4.2 4.3 4.4 4.5 4.6 4.7 4.8 4.9	Cleaning Cleaning – Edible Salt Products Maintenance Maintenance - Edible Salt Products Control of Contaminants Non-Conforming Products . Contamination - Edible Salt Products Water Used for Process & Cleaning - Edible Salt Products Waste management	9 9 9 10 10 10

	 4.11 Packing & pallets 4.12 Pest Control 4.13 Pest Control – Edible Salt Products 	11 12 12
	4.14 Glass & Brittle Materials4.15 Glass & Brittle Materials - Edible Salt Products	13 13
5	CUSTOMER RELATIONSHIPS 5.1 Sales Specifications	14
6	TEST PROCEDURES 6.1 Inspection, sampling & analysis. 6.2 Sampling 6.3 Sampling - Edible Salt Products 6.4 Test Schedule 6.5 Analysis – Edible Salt Products 6.6 Certificates of Conformance	15 15 15 15 16
7	 DISTRIBUTION 7.1 Transport 7.2 Transport - Edible Salt Products 7.3 Traceability 7.4 Complaints Procedure 7.5 Recall Procedure 7.6 Recall - Edible Salt Products 	17 17 17 18 18 18
8	AUDIT PROCEDURES 8.1 Internal audits	19
9	PRODUCT MARKING 9.1 Labelling 9.2 Labelling - Edible Salt Products 9.3 Use of the SaltAS logo	20 20 20
	endix 1 – Definitions, Specifications, Accreditations and Legislation endix 2 - Product Integrity Risk Assessment	21 22



1. THE SaltAS SCHEME

1.1 Aims of SaltAS

The SaltAS assurance scheme has been developed for the Salt Association as an industry self-regulation programme to provide a recognised symbol of quality assurance for salt products. It is intended to provide confidence that scheme participants work within a clear, consistent and auditable framework to ensure that all supplies of salt products comply with customer's quality requirements and expectations at all times.

1.2 SaltAS Scope

Participation in the SaltAS Scheme is entirely voluntary but companies electing to participate will be required to meet the relevant standards and obligations set out in this document to achieve certification. The SaltAS standard has been designed to cover the entire supply chain from production to delivery to participants' customers

1.3 The Principles of SaltAS.

This standard has been developed to provide assurance that any material supplied will comply with all relevant standards or as agreed with the customer to assure that the material meets the specification intended and that expected by the customer.

The standard is laid out as a set of generic requirements which are to be complied with by all certificated operations. Under each heading there may be a need for more detailed requirements to be set and these will be prefixed by an appropriate heading.

1.4 SaltAS Methodology

All relevant processes in the operations which relate to the salt product supply chain must be considered and included in the certification if they affect the quality of the service or product.

Compliance with any statutory requirements throughout is essential and an absolute requirement of this scheme.

Compliance with any approved standard will provide a basis for compliance with complimentary sections of this scheme. (See Appendix 1)

1.5 Claims Associated with SaltAS Certification

Claims of compliance will only relate to the products included in the scope of the Certificate.

2. OPERATION OF THE SCHEME

2.1 Application for Certification to SaltAS and the Assessment Process

The Certification process will be conducted by an approved, independent certification body. Applications for certification under the scheme must be made on the official application form.

Quotations will be issued in response to application details provided. The duration of the assessment will be decided by the certifying body and will be dependent on the scale of the applicant's operations.

Following initial certification, on-going site audits will be conducted at intervals agreed between the Association and the certifying body, as appropriate.

Unannounced or short notice audits may be carried out at the discretion of the independent certification body. Where short notice visits are as a result of concerns over the continued compliance with the requirements of this scheme the cost of these extra visits will be at the participant or contractor's expense.

2.2 Updates to the SaltAS Standard

This standard will be reviewed by the Salt Association as necessary in consultation with the independent certification body in order to revise and maintain the scheme fit for its intended purpose.

2.3 Quality Management

Although SaltAS represents 'good practice', compliance with this standard does not in itself absolve or diminish obligations that may be incumbent upon a participant as a result of any legal requirements or specific client requirements agreed between customer and supplier.

SaltAS requires the participant to have a system in place to ensure their business keeps up to date with legislation and any agreed customer specific requirements.

SaltAS methodology is built on use of risk assessment, good manufacturing practice and legal compliance. The principles of product integrity risk assessment are outlined in Appendix 2.

2.4 Implementation of SaltAS

Participants must be committed to the implementation of this standard, the operation of effective quality systems and to ensuring that customer requirements are satisfied. In addition participants must ensure that all salt products they supply meet the current legislative requirements. Documentary evidence in the form of procedures and records must be available to demonstrate this.

Participants must develop a Quality Policy to ensure legislation and customer requirements, as agreed by the participant with each customer, are met consistently. Participants must have a nominated person responsible for salt product matters ('Quality Manager'). The Quality Manager may be known by another title and also have other duties and responsibilities. The Quality Manager must have appropriate authority to carry out this function effectively.

2.5 Quality Management Structure

The responsibility and authority of personnel performing SaltAS related tasks must be documented and recorded in the form of an organisation chart.

2.6 Service Providers

Participants must develop and document procedures for ensuring that any providers of services (including transport, storage & handling and packaging) that may directly affect the salt product are

controlled. They must be evaluated for their ability to meet agreed contractual requirements and that the results of the evaluation are recorded. Records including dates of approval must be included as part of the record.

Written details must be recorded of the technical requirements that service providers are expected to fulfil. The service provided and records of performance should be available and reviewed at least annually to determine their continued suitability.

2.7 Documentation Requirements

Participants must produce and implement their own set of operating procedures that incorporate the requirements of this standard.

A documented Quality Manual must include a Quality Policy covering the scope of the Quality Management Structure. Documented procedures must be established for the Quality Management System or referenced to them. The operating procedures must be in writing and must be available to operators

2.8 Record Keeping

All records required by this standard are to be kept for a minimum of two years, unless longer periods are required by legislation. Storage facilities for records must prevent any deterioration or damage under normal storage conditions. Records must be sorted and filed in such a way that information is complete and easily retrievable. Records must be legible.

3. **HYGIENE**

3.1 Resources and Good Hygienic Practices

Business facilities and equipment must be designed, constructed, maintained, resourced and managed to ensure that the quality of salt products is protected at all times. Consideration must be given to preventing both the malicious and accidental contamination of salt products. Access to sensitive processing facilities and storage areas must be restricted to personnel authorised by the participant.

Where the site location presents risks (for example adjacent to water courses that may flood), participants must be able to demonstrate within the risk assessment plan that appropriate controls are in place to manage the risks.

The participant's risk assessment study must consider the potential effect of all activities carried out on the site, with regard to the salt products.

Natural or artificial lighting must be adequate to ensure cleaning, processing and other activities important to salt product operations can be undertaken effectively.

Ceilings and overhead fixtures must be designed, constructed and finished to prevent the accumulation of dirt and to reduce condensation, to prevent the growth of moulds and to prevent the shedding of particles that may adversely affect the safety of salt products where appropriate and based on risk assessment.

Conditions within buildings must be suitable and must not adversely affect the safety of any salt products produced, stored, transported or processed in the buildings. All equipment used must be fit for the purpose for which it is intended.

Equipment coming into contact with salt products must be designed and constructed to ensure that, where necessary, it can be adequately cleaned and maintained to avoid the contamination of the salt products as appropriate.

Risk assessment procedures must be used to identify and control any hazards that may be associated with particular equipment. Where problems occur it may be appropriate to ensure corrective action is taken as a result of these findings. Records must be kept detailing the date and nature of any corrective actions undertaken.

All drains, gutters and down-pipes must be designed and maintained in a manner that ensures they do not present a hazard to any salt products stored on the site.

3.2 Resources - Edible Salt Products

Where salt products for human consumption are produced, the premises must be maintained compliant with hygienic measures. The corrosive and abrasive nature of salt will mean contact surfaces will vary in nature from stainless steel, concrete to plastics etc. Particular care must be taken in choosing surface finishes and cleaning materials to ensure hygienic surfaces are suitably maintained.

For high risk areas the process of risk assessment shall be used to determine appropriate protection against vermin and insects for ambient air intakes and all access points such as doors and windows.

3.3 Personnel

All personnel involved in salt product related tasks must be suitably experienced and trained such that they are competent for the tasks that they undertake. Personal hygiene must be part of the training although personal hygiene levels may differ depending on the area of the operation the operative works in. However, whatever the level of personal hygiene appropriate sufficient training must be provided to ensure continuous compliance. Such training must include an introduction to risk assessment principles.

All training must be recorded and plans for continuous updates must be scheduled in order that the level of knowledge and skill will be maintained. Training records must identify the trainers involved and their qualifications to carry out the particular training. Trainees must sign training records to indicate their understanding and absorption of the topics presented.

Records of the participant's evaluation of the competence of personnel must be retained and kept updated. The responsibility and authority of personnel performing product related tasks must be documented.

Clear policies on smoking and eating / drinking on site must be made known to employees and visitors. This policy must prohibit eating, drinking and smoking in areas where these activities may adversely affect salt products. It may be necessary to provide separate facilities. Evidence that this policy has been made clear must be available.

3.4 Job Descriptions

All personnel must be informed clearly in writing of their duties, responsibilities and powers with regards to the production of salt products. This information must be updated in the event of any significant changes.

3.5 Hygiene Facilities

The participant must ensure that employees and visitors to the site have easy access to suitably equipped toilets and washing facilities. Such facilities must be close to the workplace and expected to be used as appropriate.

Protective clothing must be worn wherever contamination by personnel is identified as a risk to the product. All clothing and equipment must be maintained in hygienic condition.

3.6 Hygiene Facilities - Edible Salt Products

Hygiene facilities must be equipped with non-contact fittings and means of hygienic washing and drying of hands. Employees must be made aware of what is required of them in relation to washing hands before work commences and after visiting toilet facilities. It may be necessary for there to be the provision of dressing rooms to allow staff to change into hygienic work wear.

Employees or visitors suffering from a contagious disease which may be transferred to salt products must be excluded from production areas. This must also apply to persons with infected wounds or skin infections. Wounds must be covered by suitable dressings. These site rules must be risk assessed

Drinking water if treated for special purposes must be safe.

3.7 Health and Safety

Participants must have a clear Health & Safety Policy to prevent accidents and work related ill health. In addition the policy must provide adequate controls of work related risks to health. The business must maintain safe and healthy working conditions, provide and maintain equipment and machinery, and ensure safe storage and use of hazardous substances.

The policy must include a commitment to continual improvement aimed at eliminating all known health and safety risks and reducing the level of accidents throughout the operation

Operatives must be provided adequate training to ensure they carry out their required work related tasks safely.

Emergency procedures must be part of the training programme to ensure any significant incidents (e.g. fire) do not cause injury.

3.8 Raw Material Intake

All raw materials must be checked on intake for compliance with purchase specifications. In addition there must be checks for damage to ensure all goods are as expected. Incoming inspection records must include material identification and be dated and signed.

Facilities, including equipment related to intake, must be designed to minimise contamination or damage to incoming products and bulk or packaged material. Intake equipment must be maintained clean and suitable for handling of the materials without causing damage.

3.9 Process Control

Scheduled maintenance must be carried out by a competent person to maintain reliable production of compliant SaltAS products. Any testing schedule must be capable of verifying the compliance of the salt products with this scheme and legal compliance. (See Analysis and Testing)

Any temperature application must be monitored to ensure it complies with the specific requirements of the salt product(s) being produced.

3.10 Conveying Equipment

All conveying equipment including pumps, cyclones and valves must be included in appropriate cleaning/maintenance schedules.

Additional risks of contamination will need to be considered where conveying equipment is not enclosed.

3.11 Production Facilities & Equipment

Conditions within buildings must be suitable for production processes and must not adversely affect the salt products. All equipment used for processing salt must be fit for the purpose for which it is used.

Risk assessment procedures must be used to identify and control any hazards that may be associated with particular equipment. Where appropriate, control measures must be imposed as a result of these findings and corrective action taken as appropriate. Records must be kept to demonstrate any control measures are maintained.

Internal inspections of equipment must be carried out as required by the equipment schedules. Internal inspections and maintenance must be carried out safely and any resulting actions carried out and the details recorded.

3.12 Technological Additives and Process Aids

Control systems for any additives used must be managed by a suitably responsible person and dosing accuracy maintained to ensure consistent additions at all times. All dosing and/or monitoring systems for technological additives and process aids must be calibrated by a competent person and calibration records maintained. Records of additions must be maintained for all materials.

Where process aids are used during production / processing, these must be legal, compatible and safe for the use intended. There may be health regulations which must be observed regarding dangerous substances to maintain operator health and prevent contamination of the salt products.

Employees handling additives must have received appropriate training to ensure the additive is maintained pure and addition points and methods are suitable.

3.13 Sieves, Screens, Filters & Separators, Magnets & Metal Detectors

Critical equipment including sieves, screens, filters, separators, magnets and metal detectors must be regularly checked to ensure that they are not damaged and that they continue to operate effectively. Records of checks of all this equipment must be kept.

Where screenings (materials separated from the primary production stream by sieves, screens, filters, separators, etcetera) are reclaimed or reprocessed for inclusion in final salt products the risk assessment study must consider the potential hazards resulting from such practices. (for example, where unwanted materials are removed from a primary product and concentrated into a by-product). Any necessary precautions must be implemented.

3.14 Reprocessing

Processing of materials which have been designated as unsuitable for sale and are suitable for reprocessing must be controlled. Records must be kept to ensure the process and subsequent testing demonstrates the salt products then satisfy the necessary specification and are suitable for sale

3.15 Storage Facilities

Storage facilities for salt and salt products must be suitable, adequate and secure such that the risk of contamination is minimised. Risk assessment procedures must be developed to ensure product safety and quality is maintained. Particular attention must be paid to the segregation of products. Materials must be stored in such a way that they can be identified easily and that confusion with other products is prevented. Where a controlled atmosphere is required, records must be kept to demonstrate correct conditions have been maintained throughout.

Where outside storage is practiced salt and salt products must be protected from contamination.

Where stock rotation is necessary because of shelf-life requirements raw materials and finished products in storage areas must be monitored to ensure materials are used or despatched in order of receipt or manufacturing date to minimise deterioration.

All drains, gutters and down-pipes must be designed and maintained in a manner that ensures they do not present a hazard to any salt products processed or stored on the site.

In the case of flat stores, facilities must be organised to ensure that mud carried by vehicles cannot adversely affect stored salt products.

Where the participant utilises facilities for the storage of raw materials or salt products at sites other than the original manufacturing / processing site (whether owned or subcontracted stores), these must also comply with the relevant sections of this standard.

Participants internal audit procedures should include a risk assessment of each third party storage facility and demonstrate that any required inspections have been conducted in accordance with the stated policy.

All equipment/machinery used in stores must be suitable for the intended use. Loading facilities must be designed to ensure that contamination is kept to a minimum.

Adequate facilities for storage of non-salt products (e.g. cleaning materials, additives, lubricants, fuels, etcetera) must be provided.

3.16 Control of Monitoring & Measuring Devices

Any test equipment used for critical measurements required by this scheme must be calibrated and records kept demonstrating traceability to national standards and any outside calibration

4. HOUSEKEEPING

4.1 Cleaning

Participants must have an auditable risk assessment of the level of cleanliness appropriate and necessary to minimise the risk of contamination to the salt products at all stages of the production, storage and handling of salt products and must ensure that facilities are maintained in suitably clean state in accordance with the assessment.

4.2 Cleaning - Edible Salt Products

The necessary cleaning methods will depend on the nature of the salt products and risk assessment.

Cleaning schedules must all be documented and records kept. Records and programmes must be monitored to ensure they remain effective at all times. The monitoring must be carried out by an authorised person to verify effectiveness.

There must be a cleaning schedule to ensure defined areas of the operation including equipment and facilities are adequately cleaned and maintained in a hygienic condition. The method of cleaning must be defined including cleaning agents and their suitability for individual equipment, any necessary rinsing and the responsibility for activities must be recorded. Responsibility for monitoring effectiveness of the activity must also be designated.

Where appropriate only food compatible cleaning and sanitising agents may be allowed to come into contact with surfaces which also come into contact with salt products. Such products must be used in accordance with manufacturers' recommendations at the correct and effective dilution levels at all times.

Cleaning products must be stored, where necessary, separately in clearly identified containers to avoid the risk of (malicious or accidental) contamination. Datasheets must be kept for cleaning agents demonstrating the approval for their use.

4.3 Maintenance

Maintenance appropriate to the specific operation of equipment must be carried out and records maintained.

All equipment must be subject to a programme of planned maintenance that ensures it is kept in safe and hygienic working condition. Records must be available of maintenance carried out on all critical equipment.

The participant must ensure that engineers and contractors working on site are controlled in such a way that maintenance and building works do not adversely affect salt products.

4.4 Maintenance - Edible Salt Products

It must be considered where it is appropriate to use only food grade lubricants on process equipment to minimise the risk of contamination.

Controls of engineers and contractor operations must be appropriate to expected hygiene levels of the edible salt being produced.

4.5 Control of Contaminants

Potential contaminants must be considered at all stages of the process to minimise the risks of contamination of the salt product from other materials and other products which may be in the proximity of the process. Potential contaminants must be seen to be under control at all times.

4.6 Non-Conforming Products

Participants must establish a documented procedure for dealing with any raw materials or salt product that does not comply with specifications. This procedure must include Identification of the batches affected and the prevention of release. There must also be a segregation of batches affected and communication with relevant parties who may have received part or all of the batches. If the product is to be accepted by the customer with a concession then this must be confirmed in writing. Records of all actions must be kept. If the material is downgraded or reprocessed then these actions must be recorded and approved by the responsible manager. Risk assessment consideration must be given to the process.

There must be an evaluation of the cause of the non-conformance and corrective action to avoid repetition. These actions must be reviewed by the responsible manager.

There must be adequate facilities for the storage of contaminated product which clearly allows segregation of this material from the main salt product process and storage facilities.

4.7 Contamination - Edible Salt Product

Where appropriate, allergens must be considered as contamination risk and records must be kept to demonstrate risk assessment consideration and consequent action and the controls put in place.

4.8 Water Used For the Process and Cleaning - Edible Salt Products

A risk assessment must be carried out for any water that comes into contact with the salt products or any process / handling equipment and this must be documented.

No waste water may be incorporated into salt products unless a risk assessment study shows this to be safe and any necessary treatment is undertaken prior to use.

Material recovered from interceptors may only be incorporated into salt products where risk assessment studies confirm it will not adversely affect the salt product.

Participants must either carry out water quality tests or receive test results from their water provider at a frequency dictated by the risk assessment study. Records of water quality tests must be maintained.

Where additives (such as water softeners, anti-corrosion agents, etc.) are included in water that will come into contact with salt products, either as water or steam these additives must be considered in the risk assessment study. Any dosing systems into boilers must be calibrated and controlled to ensure the correct level of addition. Records of additive dosing must be maintained.

Separate water systems (e.g. fire control reservoirs) must be identified and must not connect with, or allow reflux into, water used for processing or cleaning.

4.9 Waste Management

Materials which are contaminants to the salt product being manufactured and are not raw materials to the process must be categorised as "waste" and handled as such. Any materials considered to be waste must be visually identified as such and promptly segregated in a manner that will eliminate the likelihood of accidental or inadvertent use.

Waste must not be collected or stored in any area or container that may be used for salt products or raw materials.

Areas or containers used to store waste must be segregated and covered as appropriate. Such waste containers must be clearly identified and be stored away from raw material and salt product storage or production areas.

Waste must be removed from site as frequently as practical and disposed of legally. Records must be kept of disposal occurrences.

Waste water disposal must ensure no contamination occurs of salt products or raw materials. Environmental pollution must be considered and prevented when considering waste water disposal.

Any dust generated must be considered for recycling or waste disposal. Odour contamination must also be considered.

4.10 Environment

Participants must have a nominated person responsible for environmental matters ('Environmental Manager'). The Environmental Manager may be known by another title and also have other duties and responsibilities. The Environmental Manager must have appropriate authority to carry out this function effectively.

The participant's Environmental Policy must be geared towards the nature of the business and its impact on the environment. It must be appropriate to the nature, scale and environmental impacts of the organisation's activities, products and services.

It must include a commitment to continual improvement and prevention of pollution in addition to a commitment to comply with relevant environmental legislation and regulations.

It must include a framework for reviewing environmental performance and be implemented and communicated to all employees and be made available to the public.

The target must be to minimize waste, especially hazardous waste, and whenever possible recycle materials. Any waste will be disposed of through safe and responsible methods.

The company must be committed to reducing emissions from industrial processes.

The company will conduct a periodic self-evaluation of the performance in implementing these principles and in complying with all applicable laws and regulations.

4.11 Packaging & Pallets

Where packaging and pallets are used they must be suitable for the salt product being handled and shall be stored in a suitable environment to minimise the risk of contamination.

The packing process must minimise the risk of contamination of the product from equipment and the environment. Labelling must comply with National Legislation and marks must be clear to ensure identification of batches can be maintained throughout storage, loading and delivery, where appropriate. Similarly weight marking must be accurate and clear. Suppliers of packaging consumables must be considered and included in the supplier approval records. Storage of packaged material must be in a clean and dry environment with clear segregation by closed doors from outside environment and production processes.

4.12 Pest Control

As appropriate to the salt products being marketed participants must take active measures to control and limit pest activity throughout the supply chain for which they are responsible. Risk assessment methods must be appropriate and identify potential problems with all the relevant classes of pests (e.g. birds, insects, reptiles and mammals) whether they are wild, feral or domestic. Under all circumstances, records must be available to show that risks from the appropriate pests are adequately managed and consistently under control.

4.13 Pest Control - Edible Salt Products

Wherever possible, pests must be excluded from the areas surrounding stores and processing plants. Where there is a risk from pests, access points must be proofed against their entry. In addition doors must be kept closed whenever possible and proofed against these pests when closed. Buildings must be kept in good repair and condition to prevent pest access and to eliminate potential breeding sites. Holes, drains and other places where pests are likely to gain access must be considered. Where external sealing is appropriate but not possible measures such as mesh screens must be in place to reduce the possibility of pest entry. External hygiene of buildings must be considered when reviewing harbourage and access for pests.

Pest infestations must be dealt with promptly and records kept of the actions. Preventative action to prevent future similar occurrences must be considered.

Appropriately qualified and trained personnel must carry out any control treatment required.

In cases where shooting is undertaken as part of the pest control programme the nature of the ammunition must be considered in the risk assessment study (e.g. lead shot is toxic).

All bait containers must be fixed in their intended position to maintain the planned location of the bait unless there is a specific reason why this is not appropriate. In such a case records must indicate the reasoning.

Consideration of the risks associated with open bait containers and loose baits must be made as securely contained bait is preferable to prevent contamination.

Pest control procedures must be documented and must ensure that no illegal materials are used.

Pest control records must include details of specific areas of the operational site and any poisons used, including safety data sheets, qualifications of personnel involved in pest control activities, site plans indicating the location of any bait stations and the baits with which they are charged, records of any pests found and details of corrective actions implemented.

Storage of pest control products must be considered when assessing risks of contamination of salt products.

4.14 Glass & Brittle Materials

Participants must ensure that glass and brittle materials are not a hazard to salt products. Where total exclusion of glass and brittle materials from processing and storage areas is not practical, formal procedures must be implemented to minimise the risk of any breakages and to ensure that should breakages occur there would be no contamination of salt products.

It may be necessary to protect light fixtures in process and storage areas to minimise the chance of salt products being contaminated in the event of breakage. If glass is a critical risk to the finished product then bottles and other glassware must be excluded from production, processing and storage areas unless specifically required under sampling procedures.

Where highlighted as critical risks all breakages of glass and brittle materials in process and storage areas must be reported and records must show how risks to salt products safety have been managed.

If glass and brittle materials are a contamination risk, those in the fabric of the plant must be routinely checked and a record of the inspections kept demonstrating the status at any time. Where glass is being protected then the nature of the protection material must be identified and be included in the register. Records must be kept including locations and dates of inspection.

4.15 Glass & Brittle Materials - Edible Salt Products

Following any breakage, cleaning equipment such as brushes that may become contaminated with broken glass or brittle materials, must be disposed of after use unless effective controls are in place to ensure that any subsequent use will not adversely affect salt products or raw materials. Records of incidents must be kept.

5. CUSTOMER RELATIONSHIPS

5.1 Sales Specifications

Sales specifications may be in accordance with a recognised industry standard or description or be included in a contract developed by the participant and the purchaser of the salt products.

All documentation must clearly state the unique product name, specification, quantity and collection/delivery period. All terms must be precise, including the specification. Where any items added to the product are cumulatively in excess of 5% of the total, the additions must be clearly marked, documented and declared to the customer.

Participants must ensure that all salt products supplied meet the agreed specifications. In all cases, the salt provided must be demonstrably equivalent to those contracted for supply.

The participant must inform the purchaser in the contract or specification of any specific transport, storage or usage requirements necessary to maintain the salt product characteristics.

Participants must be able to demonstrate appropriate methods for confirming and recording the type, quantity and specification of orders received.

6. TEST PROCEDURES

6.1 Inspection, Sampling and Analysis

Participants must have appropriate inspection regimes in place. Where relevant, inspections must include assessment of colour, physical form, contamination and compliance with specification.

6.2 Sampling

Sampling schedules must be the responsibility of the designated Quality Manager. Details of the location, method, quantity and frequencies of sampling must be documented and appropriate for the salt product. Sampling techniques and frequencies must be adequate to ensure the true representation of the salt product. Personnel training for sampling must be adequate and recorded. Samples must be retained for a documented and an appropriate period before disposal. Samples must be stored safely and labelled to assist with traceability. Disposal must be safe and appropriate.

6.3 Sampling - Edible Salt Products

There must be written procedures of the sampling methods to be applied. In order to assess the food grade quality of sodium chloride (salt) the Codex Standard for Food Grade Salt, Section 3: "Essential Composition and Quality Factors" should be used.

A blended bulk sample is produced in such a way that it is representative of the lot or consignment. It will be composed of a proportion of samples drawn from the lot or consignment to be analysed.

Acceptance criterion is on the basis that the mean value obtained from analyses of those blended bulk samples must comply with the provision in the standard.

Sampling may be carried out by "random sampling" or by "systematic sampling". The choice of the method to be used depends on the nature of the lot (for example: if the packages are marked with successive numbers, systematic sampling may be suitable).

6.4 Test Schedule

Where analysis is appropriate to the salt material being sold and therefore carried out, participants must be able to demonstrate that adequate tests are being undertaken using methodology that is appropriate to the raw materials and salt products concerned. The risk assessment study may have identified some or all of the tests required. The designated Quality Manager must be responsible for all the testing being carried out.

The test methodology must be robust enough to ensure the salt products concerned achieve the required standards and must show consideration of volumes and potential risks.

Testing Laboratories must be competent for the tests required and the methods of analysis employed in these laboratories must be appropriate for the salt products being tested.

Test results must be reviewed by an authorised and competent person(s) with responsibility for ensuring that both raw materials and salt products meet specified parameters. The parameters for acceptance or rejection of both raw materials and salt products must be clearly defined. When rejections occur the cause of the rejection must be investigated and actions taken to prevent reoccurrence. Any rejected material may need to be reviewed for a plant contamination and a rejected product recall being instigated. Records of all actions must be kept including the end destination of

rejected and recalled product. Following review it may be appropriate to increase the frequency of sampling and testing to prevent reoccurrence.

The test schedule must consider retention of samples and the most appropriate safe storage condition.

Appropriate method of disposal of samples must also be documented.

6.5 Analyses - Edible Salt Product

Edible salt products will have a testing schedule based on the regular testing requirements of Codex

Salt may also be fortified with various trace vitamins and minerals but these must comply with customer specifications. Participants must have evidence of the limits and demonstrate by test records that they are continuously compliant. The addition of the fortified material must be controlled such that the quantity added is consistent with the formulation.

A microbiological analysis schedule will be required for edible salt

6.6 Certificates of Conformity

If certificates of conformity are required by the customer specifications these must be accurate depending on customer requirements.

7. DISTRIBUTION

7.1 Transport

There must be documented procedures to maintain product safety and quality during loading and transportation. There must also be clear records of despatch to allow traceability of product throughout. Participants must adopt procedures that reflect the different risks associated with the carriage of packaged and bulk goods.

All means of transport (whether bulk, container or packaged and road, rail or water) whether owned or contracted by other businesses to carry salt products must be appropriate and adequately controlled with specific regard to potential contamination. They must meet customer requirements and be in line with the participant's quality procedures.

Records of despatches must be kept and include details of loading from specific sources of salt product throughout the supply-chain. Records of specific trailer or container identification and approval as suitable for loading, weight loaded and date must be kept. If specific requirements or restrictions are expected of the haulage vehicle then this must be included in the contract terms exchanged and agreed.

Where the means of land transport is contracted to a third party, businesses must take reasonable precautions to avoid potential hazards and contamination dependant on the type of salt product being carried.

If concurrent cargoes are carried on any vehicles the potential for contamination must be considered before use.

Inspections must be made to validate the cleanliness and suitability of the load carrying area Consideration must be given to previous loads carried on the vehicle as these may be unsuitable for current loading to take place.

There must be maintenance procedures and records for all loading equipment, vehicles, hoses etc.

Similar records are expected to be kept when water transport is involved.

7.2 Transport – Edible Salt Products

Haulage companies may be certificated to BRC Storage and Distribution but the scope of their certification must relate to salt in order to be recognised.

Where cleanliness is important an inspection must be carried out with records available to demonstrate suitability of vehicles before loading except in the case of bulk tankers where inspection is not practical. Where third party or customer's own vehicles are used, the participant must ensure that the haulier has appropriate procedures to minimise the risk of contamination. If the vehicle is not suitable or adequate records are not available, then the customer must approve loading in writing. Records of such approvals in writing must be kept.

7.3 Traceability

Where appropriate, traceability must be possible for all salt products. Participants must be able to demonstrate traceability for all the materials utilised to produce salt products. This will require the ability to produce a traceability trail for each salt product back to the point in the supply chain necessary to control any hazards identified in the risk assessment for each raw material.

Records of traces must be kept to demonstrate that an effective system exists and trace is possible. Although the business need not hold all relevant traceability records for materials, they must be capable of accessing such records if required to do so. The trace must include all areas of the plant and there must be a system ensuring the traceability of all products.

7.4 Complaints Procedure

Participants must document and include systems for recording the characteristics of all complaints, allocating responsibility for managing complaints, recording the name of complaining customers including the salt product under complaint.

The cause of the complaint must be investigated and recording of any actions taken to address complaints. Records must also be kept of actions taken to prevent the problem reoccurring.

7.5 Recall Procedure

Participants must have a documented recall procedure that ensures customers can be informed promptly in the event of any irregularity that may adversely affect salt products. The procedure must detail responsibilities and actions to be taken in the event of a recall. The procedure must include identification of all despatches involved. There must be records of the outcome of the investigation, locations of recipients and the source of the recalled material and destination and disposal or reprocessing action taken.

There must be a formal assessment by the quality manager before any reprocessing is carried out.

7.6 Recall Procedure - Edible Salt Products

An annual recall test must be carried out and recorded. The recall test is effectively a traceability exercise to demonstrate that despatches of salt product can be identified and traced to individual customers.

8. AUDIT PROCEDURES

8.1 Internal Audits

These audits are to check systems are operating as intended. The internal audits must confirm operations of procedures in relation to this standard, the business risk assessment, legislation and customer satisfaction including all relevant activities.

Participants must have a documented procedure for internal auditing. Internal auditing procedures must require the participant to carry out a programme of planned internal audits to check that procedures are effective. The frequency of audits must be based on a risk assessment. The outcome of internal audits must be formally reported to the appropriate management responsible for the area audited and a record kept of any aspects where the operations are not in compliance with operational requirements. Such areas of non-compliance must be corrected and audit report records signed off by an authorised person to indicate that problems have been corrected satisfactorily.

All personnel carrying out internal audits must be trained to carry out such audits and be able to demonstrate their effectiveness in the role.

9. PRODUCT MARKING

9.1 Labelling

Where packaged product is for onward resale to the public, each bag or IBC of salt must be labelled with:

- an accurate identification of the product contained in the bag
- the weight of the contents marked on the bag.

(For example, a mixture of salt and sand must show the percentage of each which it contains.)

9.2 Labelling - Edible Salt Product

Name "salt" and declared as "Food Grade" or "Cooking Salt" or "Table Salt".

Where salt is used as a carrier for one or more nutrients, and sold as such for public health reasons, the name of the product shall be declared properly on the label, for example "salt fluoridated", "salt iodated", "salt iodized", "salt fortified with iron", "salt fortified with vitamins" and so on, as appropriate.

An indication of either the origin, according to the description or the method of production may be declared on the label, provided such indication does not mislead or deceive the consumer.

Information for non-retail containers shall either be given on the container or in accompanying documents, except that the name of the product, lot identification and name and address of the manufacturer or packer shall appear on the container. However, lot identification and the name and address of the manufacturer or packer may be replaced by an identification mark, provided that such mark is clearly identifiable with the accompanying documents.

9.3 Use of SaltAS logo

The SaltAS Certification Mark may only be used in the form shown below. Certification marks may only be used on company stationery, literature and advertisements - They may not be shown on vehicles, buildings and/or flags. The mark may also be used on the product itself and primary packaging. The mark must not be used on laboratory test, calibration or inspection reports.



Appendix 1

<u>Definitions</u>, <u>Specifications</u>, <u>Accreditations and Legislation</u>

Definitions

Salt is NaCl - Sodium Chloride.

Anti-Caking Agents are added to salt to aid free flowing. They have statutory requirements and must be REACH approved.

Specifications

BS3247:2011 specifies the salt used for highway winter maintenance.

BS 998:1990 - Specification for vacuum salt for food use.

BS EN 973:2009 - Chemicals used for treatment of water intended for human consumption.

Sodium chloride for regeneration of ion exchangers

Accreditations

ISO 22000 Food safety standards

ISO 9001 Quality standards

BRC Compliance – British Retail Consortium Standard.

FEMAS Feed material assurance scheme.

UFAS

Codex STAN 150-1985 Food Grade Salt

Legislation

Relevant Weights and Measures Act

Product Marking

VOSA

All other relevant statutory requirements.

Participants must demonstrate knowledge of all the relevant legislation pertaining to salt products the participant produces, handles or stores. The business must be able to demonstrate compliance with all the relevant legislation. In addition the SaltAS business must be able to demonstrate that they have systems and procedures in place that ensure they remain up-to-date with regulatory requirements and any salt issues relevant to the salt products they supply.

Appendix 2

PRODUCT INTEGRITY RISK ASSESSMENT

PRODUCT SAFETY MANAGEMENT - Risk Assessment

Understanding potential hazards is essential in the production process and it will be expected that a risk assessment study is carried out and fully documented.

Commitment to the risk assessment. A formal risk assessment must be carried out with the aim of identifying and controlling hazards that might adversely affect the quality of any salt products supplied. Risk assessments must be carried out in accordance with recognised RISK ASSESSMENT principles such as those outlined by the Codex Alimentarius Commission of the World Health Organisation in 'Recommended International Code of Practice General Principles of Food Hygiene – CAC/RCP 1- 1969, Rev. 4 – 2003'

<u>Risk Assessment Scope</u> must be defined in the risk assessment document.

<u>Prerequisites.</u> For practical purpose participants may wish to recognise 'prerequisites' for the risk assessment system they implement (i.e. specified, formal procedures that control potential hazards on a site-wide basis, such as: pest control, glass policies, training etc. Any prerequisites used must be defined as part of the risk assessment plan and included in the annual auditing schedule.

<u>Risk assessment Team</u> The risk assessment team must include personnel from all of the relevant operations and functions within the company and at least one member with demonstrably effective Risk Assessment training. The team members must be recorded in the risk assessment document.

<u>Specifications</u> Each salt product must have a written description and specification that is made available to purchasers and potential purchasers of the material offered by the participant.

<u>All process steps</u> The team must identify all process steps involved in the production process and supply chain through to the transfer of ownership of the goods to the customer. This must be illustrated by using a flow diagram which shows each step in the process.

<u>Hazard Analysis.</u> A hazard analysis must be carried out and recorded for each process step to identify all hazards which may affect the salt product. A separate hazard analysis must be carried out for each product. The hazards considered must include Physical, Chemical and Microbiological.

<u>Control Measures</u> must be documented for each specific hazard identified. Each control measure must be robust enough to prevent the occurrence of the identified hazard.

<u>Identify CCP</u> (Critical Control Point) Control measures that are essential in detecting and eliminating hazards (i.e. the hazard would not be detected or removed at any later stage in the operation) must be regarded as Critical Control Points (CCPs) and must be identified as such within the study.

<u>Establish Critical Limits</u> The risk assessment team must identify the critical limits for all of the hazards that have been identified as CCPs and be able to show the basis on which the suitability of these limits is based.

<u>Monitoring</u> The CCPs in the operation and the salt products themselves must be inspected and sampled (monitored) to ensure identified hazards remain under control. Monitoring must be implemented in accordance with a documented schedule and all results of inspections and sampling must be recorded.

<u>Corrective actions</u> Participants must record action to be taken when critical limits are breached and ensure that these actions deal with both the cause of the problem and the consequences of the problem.

<u>Risk Assessment Review</u> At least one complete risk assessment review must be carried out each year and must include any prerequisites established as part of the risk assessment plan. A record must be kept of risk assessment reviews showing the risk assessment team findings and any actions implemented. A review must also take place whenever a Critical Limit is breached to ensure sufficient controls are in place.