

FSSC 22000 Food Packaging Safety Management System Implementation Workbook



This FSSC 22000 Implementation Workbook compliments our comprehensive FSSC 22000 Packaging Food Packaging Safety Management System package and guides you on the path to achieving FSSC 22000 Certification.

We have written this workbook to assist in the implementation of your Food Packaging Safety Management System. The workbook is divided into 9 steps that are designed to assist you in implementing your Food Packaging Safety Management System effectively:

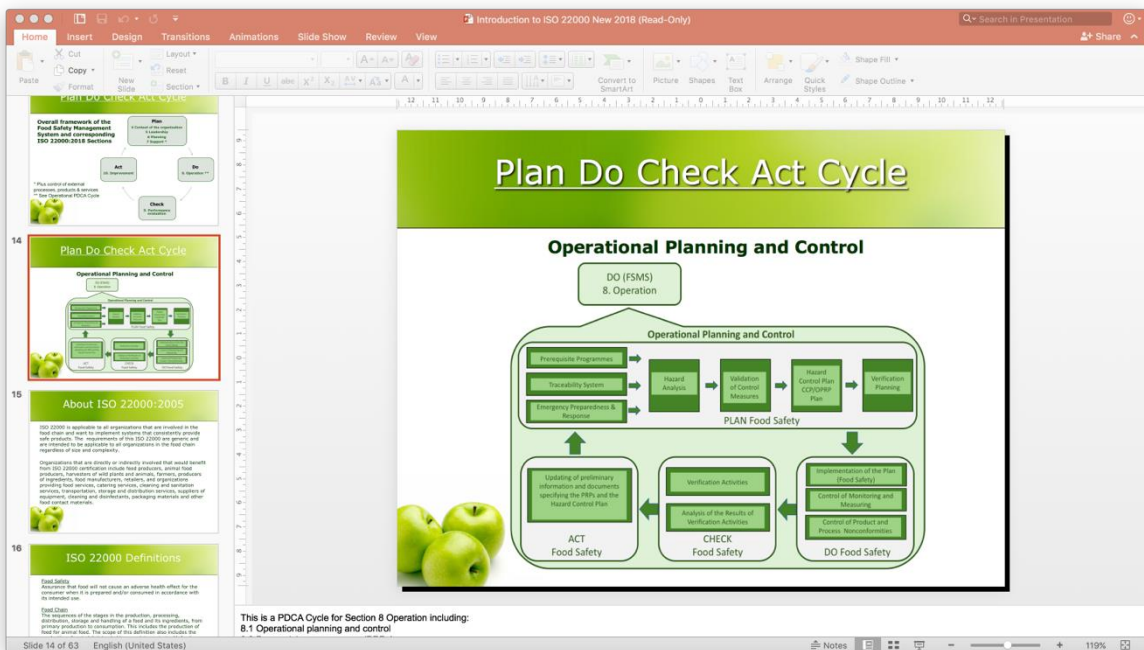
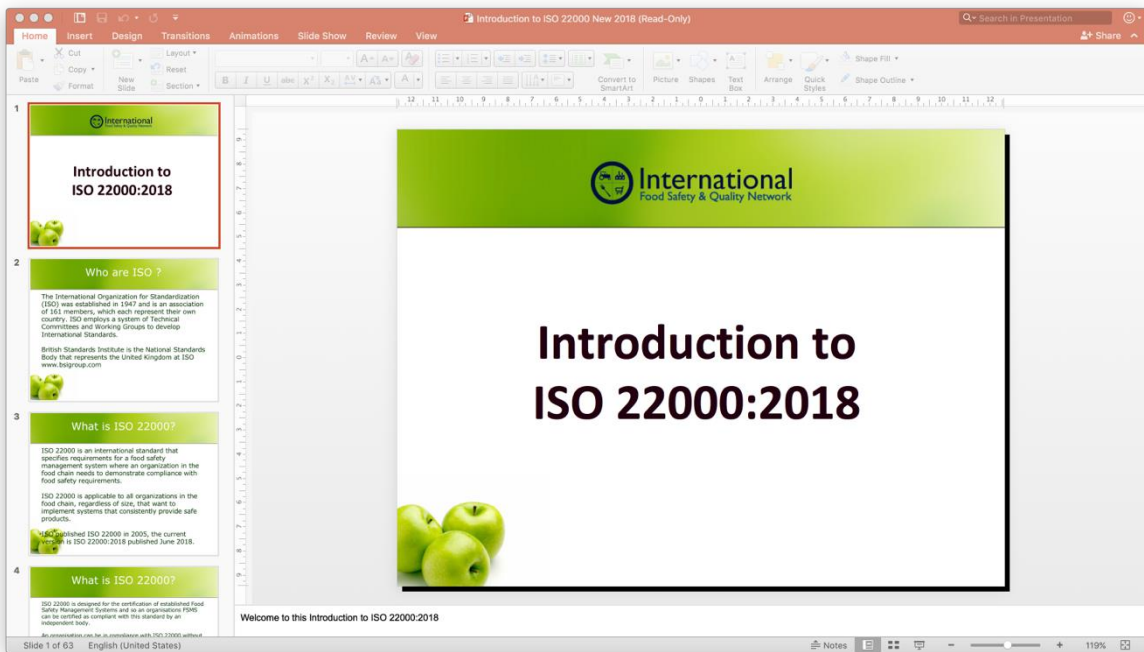
- ✓ Step One: ISO 22000 & ISO 22002-4 Familiarisation
- ✓ Step Two: GAP Analysis
- ✓ Step Three: Senior Management Implementation
- ✓ Step Four: Project 22000
- ✓ Step Five: Food Packaging Safety Management System
- ✓ Step Six: HACCP Implementation
- ✓ Step Seven: Internal Auditing Training & Checklists
- ✓ Step Eight: Review and Updating
- ✓ Step Nine: Final Steps to FSSC 22000 Certification

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Step One: ISO 22000 & ISO 22002-4 Familiarisation

Training: Introduction to ISO 22000

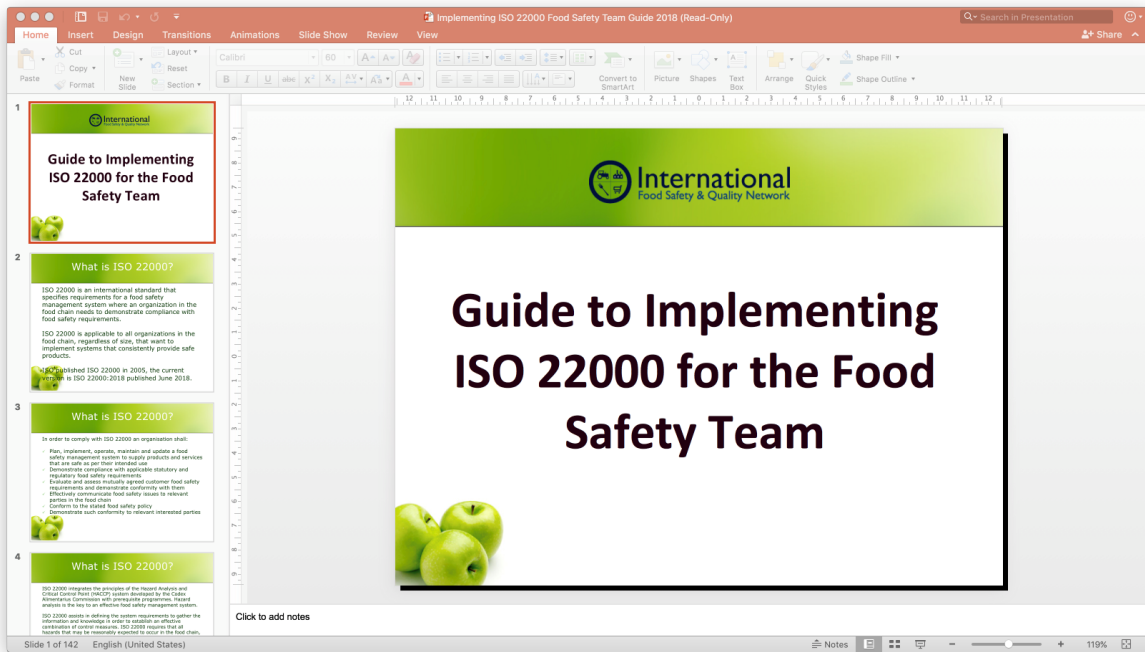
This PowerPoint presentation will introduce the ISO 22000 standard to the management team and explain exactly how to start the process of implementing an ISO 22000 compliant Food Packaging Safety Management System.



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Food Safety Team: ISO 22000 Implementation Guide

The Food Safety Team: ISO 22000 Implementation Guide PowerPoint presentation supplied with the system explains to the Food Safety Team their role in implementing an ISO 22000:2018 compliant Food Safety Management System.



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Top Management FSMS Implementation Meeting

Date/Time

Venue

Agenda

1. Determine external and internal issues that are relevant and affect its ability to achieve the intended result(s) of its FSMS
2. Determine the interested parties (Customer, Regulatory, Statutory and other) that are relevant to the FSMS
3. Determine Customer, Regulatory, Statutory and other relevant Food Safety requirements
4. Define the scope and boundaries of the FSMS
5. Develop a Food Safety Policy
6. Based on the Food Safety Policy establish Food Safety Objectives
7. Plan the establishment of the FSMS using the project planner
8. Provide adequate support to establish the FSMS
9. Ensure there is adequate infrastructure and work environment
10. Allocate responsibility and authority
11. Assess, plan and establish appropriate internal and external communication (including the food chain) channels

Attendees:

Top Management Team		
Job Title	Name	Role in Team
Managing Director		Chairman
General Manager		Deputy Chair
Operations Manager		Operations Reporting
Technical Manager		Food Safety and Quality Reporting Management Representative
Planning Manager		Planning and Capacity Reporting
Distribution Manager		Distribution Reporting
Maintenance Manager		Services and Engineering Provision
Finance Manager		Financial Reporting
Human Resources Manager		Resource reporting

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Top Management: Determine external and internal issues that are relevant and affect its ability to achieve the intended result(s) of its FSMS

Top Management need to determine the internal and external issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS. In order to achieve this aim Top Management should out an Organization Analysis considering external and internal issues, including legal, technological, competitive, market, cultural, social and economic environments, cybersecurity and food fraud, food defence and intentional contamination, knowledge and performance of the organization.

This analysis can be carried out using the FSMS 4.1 Organization Risk Analysis Tool included in the package:

Organizational Risk Analysis							
Area of Issue	Description	Internal External	Positive Negative	International National Regional Local	Risk Level	Proposed Action	Timescale Priority
Legal	Issues complying with FSMA	Internal	Negative	National	High	Bring in external resource to assist in FSMA compliance	Priority
Technological	Technology out of date	Internal	Negative	International	Medium	Renew out of Date Technology	
Competition	Lack of Competition	External	Positive	Regional	Low	Increased Marketing	
Market	Only Short Term Customer Contracts	External	Negative	International	High	Seek Longer Term for Customer Contracts	Priority
Cultural	Product of Religious, ethical or moral significance	External	Negative	Local	Low	Also look to Products not of Religious, ethical or moral significance	
Social	Need for Seasonal Workers	Internal	Negative	Local	High	Contract Seasonal Workers	Priority
Economic environments	Harvest Failure	External	Negative	National	Medium	Look for Alternative Supplies	
Food fraud	Economically motivated adulteration (EMA)	External	Negative	International	Medium	Increased Supplier Assurance & Product Testing	
Food defence, Cybersecurity & Intentional contamination	Premises located in a politically or socially sensitive area	Internal	Negative	Local	High	Increase Security Short Term. Long Term look to relocate.	Priority
Knowledge (Organization)	Lack of Technical Skills	Internal	Negative	Local	Medium	Recruit Technical Skills	
Performance (Organization)	Unreliable Operations	Internal	Negative	Local	High	Project Implementation Operational Efficiency	Priority

The FSMS 4.1 Organization Risk Analysis Tool allows Top Management to summarise the Analysis by Area of Issue; Description of Issue; Whether Internal or External; Whether Positive or Negative; Whether International, National, Regional or Local; Risk Level; Proposed Action; Timescale and Priority.

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Top Management FSMS Implementation Checklist

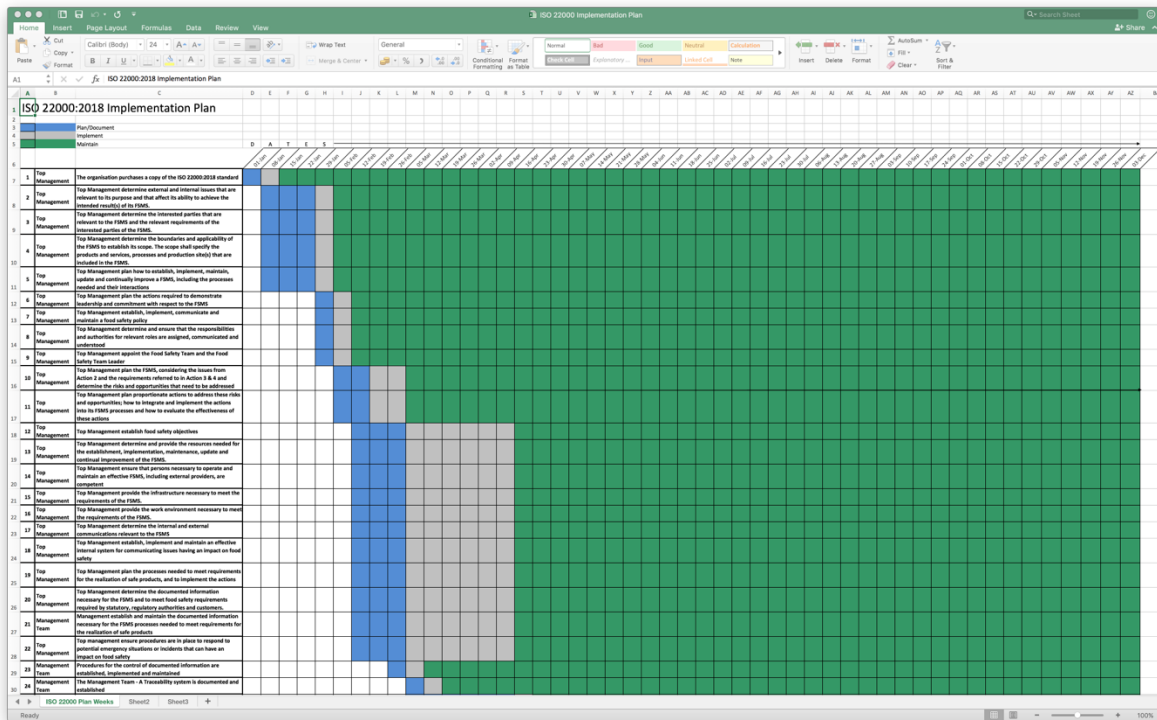
The Top Management FSMS Implementation Meeting should follow the guidelines of the Top Management Implementation Checklist:


1	Top Management determine external and internal issues that are relevant and affect its ability to achieve the intended result(s) of its FSMS	
	External & Internal Issues	Actions to address risks and opportunities
2	Top Management Determine the interested parties (Customer, Regulatory, Statutory and Other) that are relevant to the FSMS.	
	Interested Parties (Customer, Regulatory, Statutory and Other)	Details

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Top Management Establish the Project Plan

Using the Excel Project Planner Top Management adapt the template supplied with the system to establish a Project Plan.





ISO 22000:2018 Implementation Plan

Step	Responsible Team	Implementation Task
1	Top Management	The organisation purchases a copy of the ISO 22000:2018 standard
2	Top Management	Top Management determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS.
3	Top Management	Top Management determine the interested parties that are relevant to the FSMS and the relevant requirements of the interested parties of the FSMS.
4	Top Management	Top Management determine the boundaries and applicability of the FSMS to establish its scope. The scope shall specify the products and services, processes and production site(s) that are included in the FSMS.
5	Top Management	Top Management plan how to establish, implement, maintain, update and continually improve a FSMS, including the processes needed and their interactions
6	Top Management	Top Management plan the actions required to demonstrate leadership and commitment with respect to the FSMS
7	Top Management	Top Management establish, implement, communicate and maintain a food safety policy
8	Top Management	Top Management determine and ensure that the responsibilities and authorities for relevant roles are assigned, communicated and understood
9	Top Management	Top Management appoint the Food Safety Team and the Food Safety Team Leader
10	Top Management	Top Management plan the FSMS, considering the issues from Action 2 and the requirements referred to in Action 3 & 4 and determine the risks and opportunities that need to be addressed
11	Top Management	Top Management plan proportionate actions to address these risks and opportunities; how to integrate and implement the actions into its FSMS processes and how to evaluate the effectiveness of these actions
12	Top Management	Top Management establish food safety objectives
13	Top Management	Top Management determine and provide the resources needed for the establishment, implementation, maintenance, update and continual improvement of the FSMS.

Document Reference FSMS 8 ISO 22000:2018 Implementation Plan
 Revision 1 22nd June 2018
 Owned by: Production Manager
 Authorised By: Technical Manager

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Workbook

- External communication and liaison regarding the management systems.

Site and Departmental Annual Objectives and targets are agreed and documented in the Management Review minutes.

Objectives of the food safety management system and planning to achieve them

For Objectives Top Management need to define:

- what will be done
- what resources will be required
- who will be responsible
- when it will be completed
- how the results will be evaluated.

Key Personnel and Nominated Deputies

Job Title	Job Holder	Nominated Deputy
Emergency Response Coordinator		
General Manager		
Operations Manager		
Production Manager		
Warehouse Manager		
Maintenance Manager		
Factory Safety Manager		
Human Resource Manager		
Quality Manager		
Packing Manager		
Technical Manager (Food Safety Team Leader)		
Goods Receipt Manager		
Design and Development Manager		
Planning Manager		
Customer Service Manager		
Laboratory Manager		
Distribution Manager		

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Top Management establish Communication Channels

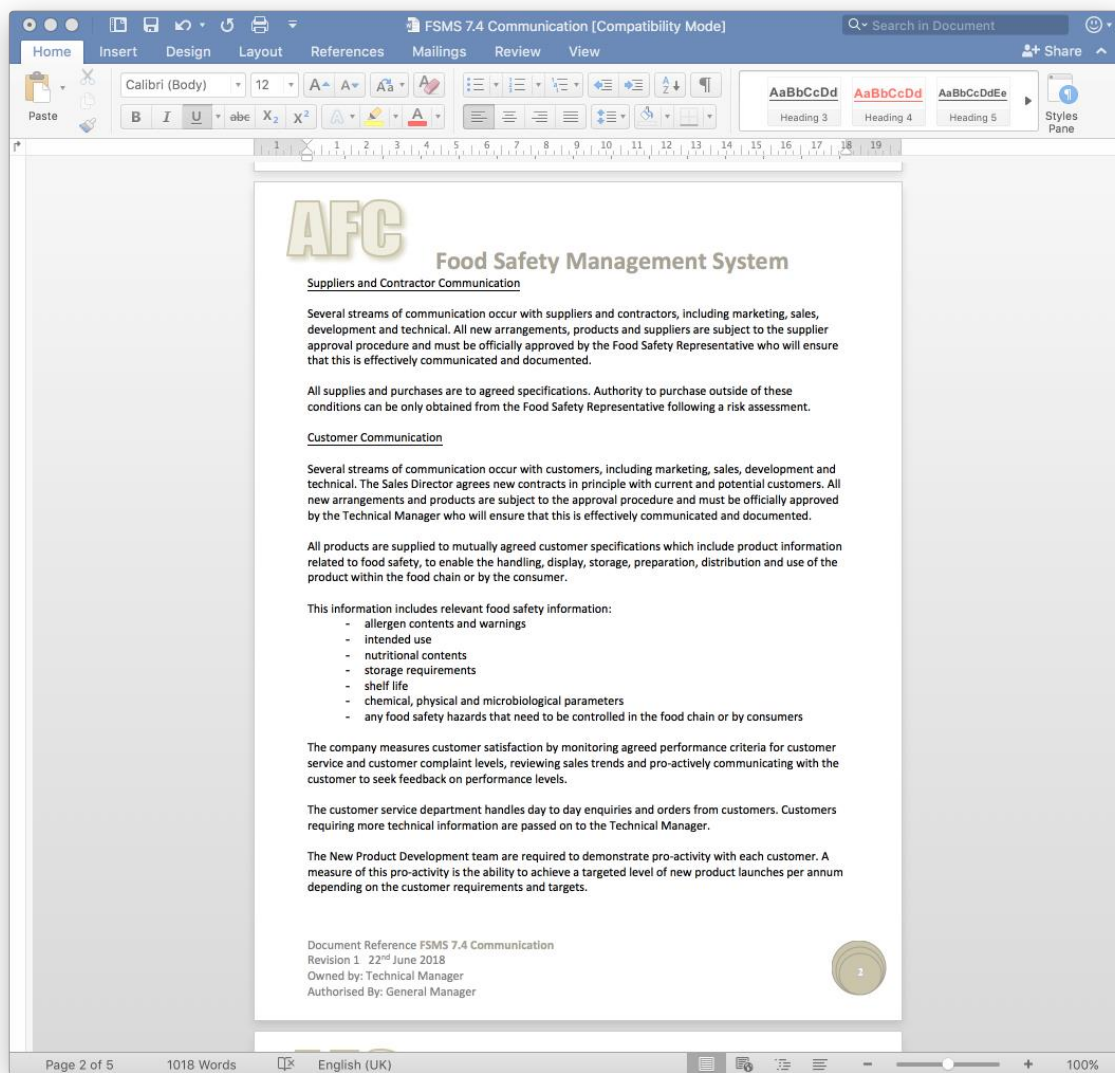
Top Management must establish and document clear levels of communication for suppliers, contractors, customers, food authorities and staff within the food safety management system. Detailed communication arrangements and food safety communication responsibilities for all levels of management should contained in the food safety and quality manual. The communication procedures should apply to all members of staff, both full time and temporary.

Procedures should be in place to address communication including:

Suppliers and Contractor Communication

Customer Communication

Food Authority Communication



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Workbook

Top management assess plan and establish appropriate internal and external communication (including the food chain) channels		
Communication required	Details	Responsibility

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Step Four: Project 22000

A significant part of the implementation process is training. Job Descriptions should be available for all staff and they should be briefed and aware of their Food Packaging Safety responsibilities.

A training matrix and plans should be drawn up for all staff and the relevant training given based on responsibility and authority.

Staff Training Matrix



Employee Number	Employee Name	Job Title	Training Course																											
			Introduction to ISO 22000	Understanding ISO 22000	Food Safety for ISO 22000 Implementation Guide	ISO 22000 Document Requirement Guide	Prerequisite Training	Colony QMS Training	HACCP Training	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course Details Here	Training Course	
1	John Smith		1/1/20																											
2																														
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We have provided a Staff Training Matrix Template in Microsoft Excel Format.

For each employee and individual training record should be completed. QMR 002 Training Record is provided in the documentation pack as a template:

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QMR 002 Training Record

Period Training Required	Details of Internal Training or External Training Course	Dates of Training	Signed (Trainee)	Assessed as Competent Signed (Trainer)
Weeks 1 - 4	Induction			
	Food Safety & Quality Policy Briefing			
	Food Safety & Quality Objectives			
	Health and Safety Procedure			
	Records monitoring and control			
Weeks 5 - 13	Environment and Waste Management			
	Packing Procedure			
	Operating Procedure			
	Loading Procedure			
	Labelling Procedure			

Document Reference Training Record QMR 002
Revision 1 8th May 2017
Owned by: Technical Manager
Authorised by: General Manager

Period Training Required	Details of Internal Training or External Training Course	Dates of Training	Signed (Trainee)	Assessed as Competent Signed (Trainer)
Months 3 - 6	Management skills (inc. one to one training, communication skills)			
Months 6 - 12	Management skills (inc. one to one training, communication skills)			

Basic ISO 22000 Training should be given to all staff:

- ✓ Part of Introduction to ISO 22000

The Food Packaging Safety Team should receive extra training:

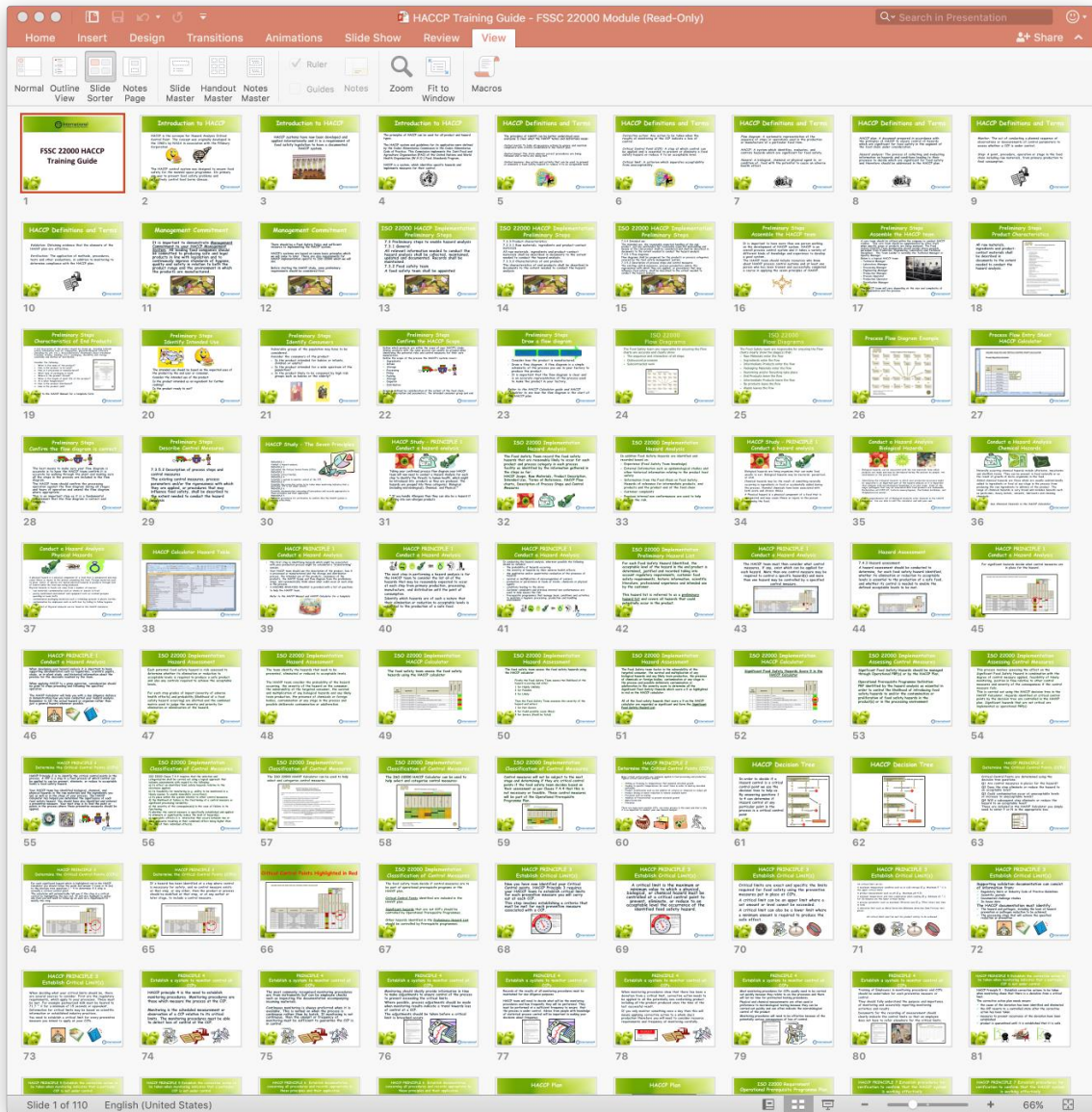
- ✓ Food Packaging Safety Team: ISO 22000 Implementation Guide
- ✓ Prerequisite Training
- ✓ HACCP Training

Remember all food packaging handlers should receive Basic Food Hygiene Training

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HACCP Training

An interactive and illustrated PowerPoint HACCP training presentation is supplied to train your Food Packaging Safety team in the preliminary steps to a Hazard analysis, the principles of HACCP and how to utilise the HACCP calculator in implementing your HACCP system.



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Steering Group Take Control of the Project

This contains the project tools you need to implement your FSSC 22000 compliant Food Packaging Safety Management System. At this stage:

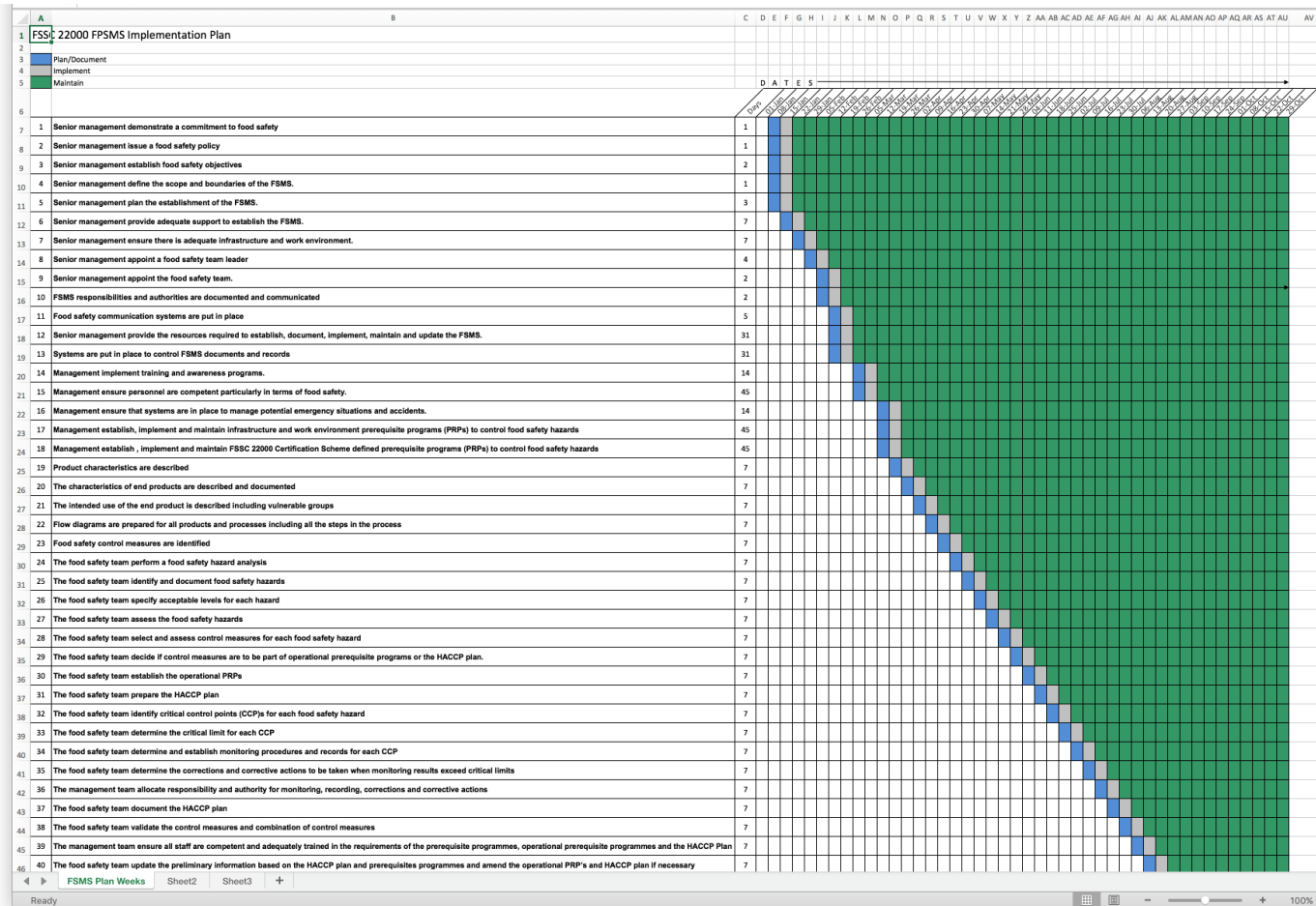
- ✓ Steering Group are established and briefed
- ✓ The Steering Group take control of the Project Plan established by Senior Management

Food Packaging Safety Management System Steering Group			
FPSMS Team Member	Name	Position	Qualification
FPSMS Team Leader			
FPSMS Assistant Leader			
FPSMS Team Members			

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Project Plan

The Steering Group use the Excel Project Plan developed by Senior Management as a step by step guide to implementing the Food Packaging Safety Management System.



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Project Planning Tasks		Responsibility	Comments	Due Date for Completion	Date Completed
1	The organisation purchases a copy of the ISO 22000:2018 standard	Top Management			
2	Top Management determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS.	Top Management			
3	Top Management determine the interested parties that are relevant to the FSMS and the relevant requirements of the interested parties of the FSMS.	Top Management			
4	Top Management determine the boundaries and applicability of the FSMS to establish its scope. The scope shall specify the products and services, processes and production site(s) that are included in the FSMS.	Top Management			
5	Top Management plan how to establish, implement, maintain, update and continually improve a FSMS, including the processes needed and their interactions	Top Management			
6	Top Management plan the actions	Top Management			

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Food Packaging Safety Manual

The Food Packaging Safety Quality Manual contains comprehensive top level procedures templates that form the foundations of your Food Packaging Safety Management System so you don't have to spend 1,000's of hours writing compliant procedures:

4 Context of the organization

FSMS 4.1 Understanding the organization and its context

FSMS 4.2 Understanding the needs and expectations of interested parties

FSMS 4.3 Determining the scope of the food safety management system

FSMS 4.4 Food safety management system

The screenshot shows a Microsoft Word document in Compatibility Mode. The document title is "FSMS 4.1 Understanding the organization and its context". The content includes the AFC logo, the title "Food Safety Management System", and section "4.1 Understanding the organization and its context". The text describes the company's determination of internal and external issues. Below the text is a table titled "Organization Analysis" with columns for "Area of Issue", "Description", "Internal External", "Positive Negative", and "International National Regional Local". The table lists various areas of issue such as Legal, Technological, Competition, Market, Cultural, Social, Economic environments, Cybersecurity, Food fraud, Food defence, Intentional contamination, Knowledge (Organization), and Performance (Organization). At the bottom, there is a footer with document reference, revision date (22nd June 2018), and ownership information.

AFC Food Safety Management System

4.1 Understanding the organization and its context

The company has determined internal and external issues that are relevant to its purpose and that affect its ability to achieve the intended result(s) of its FSMS. In order to achieve this aim Top Management have carried out an Organization Analysis considering external and internal issues, including legal, technological, competitive, market, cultural, social and economic environments, cybersecurity and food fraud, food defence and intentional contamination, knowledge and performance of the organization.

Area of Issue	Description	Organization Analysis		
		Internal External	Positive Negative	International National Regional Local
Legal				
Technological				
Competition				
Market				
Cultural				
Social				
Economic environments				
Cybersecurity				
Food fraud				
Food defence				
Intentional contamination				
Knowledge (Organization)				
Performance (Organization)				

Top management are responsible for identifying, reviewing and updating information related to these external and internal issues.

Document Reference FSMS 4.1 Understanding the organization and its context
Revision 1 22nd June 2018
Owned by: Technical Manager
Authorised By: General Manager

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Organizational Risk Analysis							
Area of Issue	Description	Internal External	Positive Negative	International National Regional Local	Risk Level	Proposed Action	Timescale Priority
Legal	Issues complying with FSMA	Internal	Negative	National	High	Bring in external resource to assist in FSMA compliance	Priority
Technological	Technology out of date	Internal	Negative	International	Medium	Renew out of Date Technology	
Competition	Lack of Competition	External	Positive	Regional	Low	Increased Marketing	
Market	Only Short Term Customer Contracts	External	Negative	International	High	Seek Longer Term for Customer Contracts	Priority
Cultural	Product of Religious, ethical or moral significance	External	Negative	Local	Low	Also look to Products not of Religious, ethical or moral significance	
Social	Need for Seasonal Workers	Internal	Negative	Local	High	Contract Seasonal Workers	Priority
Economic environments	Harvest Failure	External	Negative	National	Medium	Look for Alternative Supplies	
Food fraud	Economically motivated adulteration (EMA)	External	Negative	International	Medium	Increased Supplier Assurance & Product Testing	
Food defence, Cybersecurity & Intentional contamination	Premises located in a politically or socially sensitive area	Internal	Negative	Local	High	Increase Security Short Term. Long Term look to relocate.	Priority
Knowledge (Organization)	Lack of Technical Skills	Internal	Negative	Local	Medium	Recruit Technical Skills	
Performance (Organization)	Unreliable Operations	Internal	Negative	Local	High	Project Implementation Operational Efficiency	Priority

AFC
Food Safety Management System

4.2 Understanding the needs and expectations of interested parties

Top management has determined relevant interested parties and the food safety requirements of those interested parties so that the company has confidence in its ability to consistently provide products and services that meet applicable statutory, regulatory and customer requirements.

Category	Food Safety Requirement	International National Regional Local
Statutory		International
Statutory		National
Statutory		Regional
Statutory		Local
Regulatory		International
Regulatory		National
Regulatory		Regional
Regulatory		Local
Customer 1		International
Customer 2		National
Customer 3		Regional
Customer 4		Local
Customer 5		

Top management are responsible for identifying, reviewing and updating information related to the interested parties and their requirements.

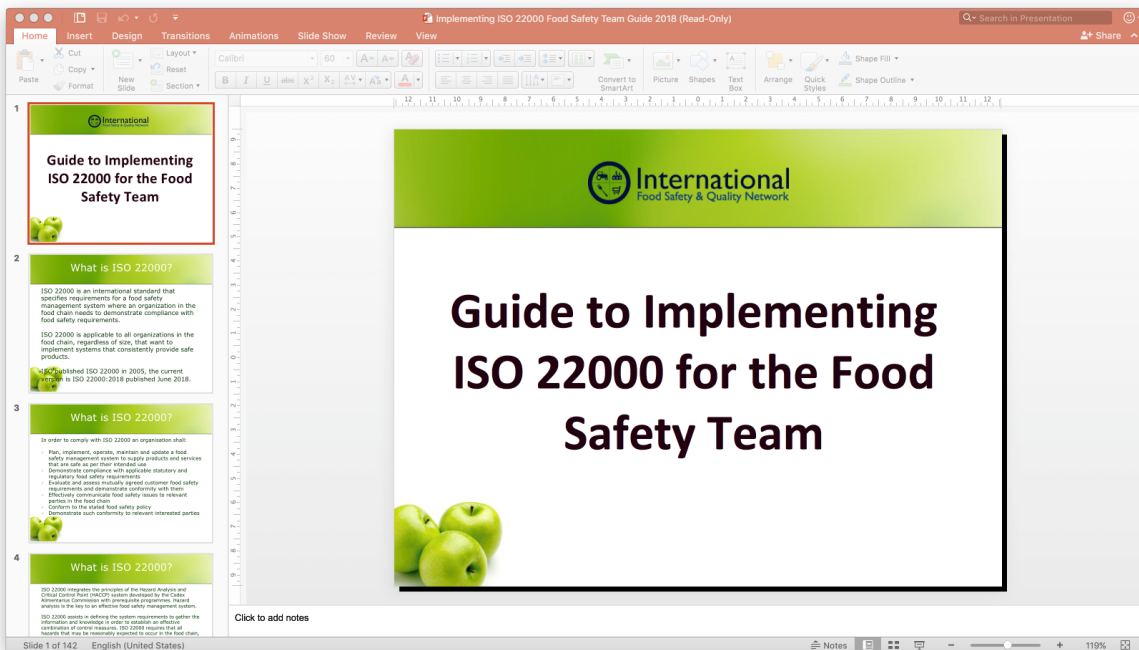
Document Reference FSMS 4.2 Understanding the needs and expectations of interested parties
Revision 1 22nd June 2018
Owned by: Technical Manager
Authorised By: General Manager

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Step Six: HACCP Implementation

We will now go through a step by step guide to implementing your HACCP using the HACCP Calculator. It is advisable that all involved particularly the Food Safety/HACCP Team view the following training presentations first:

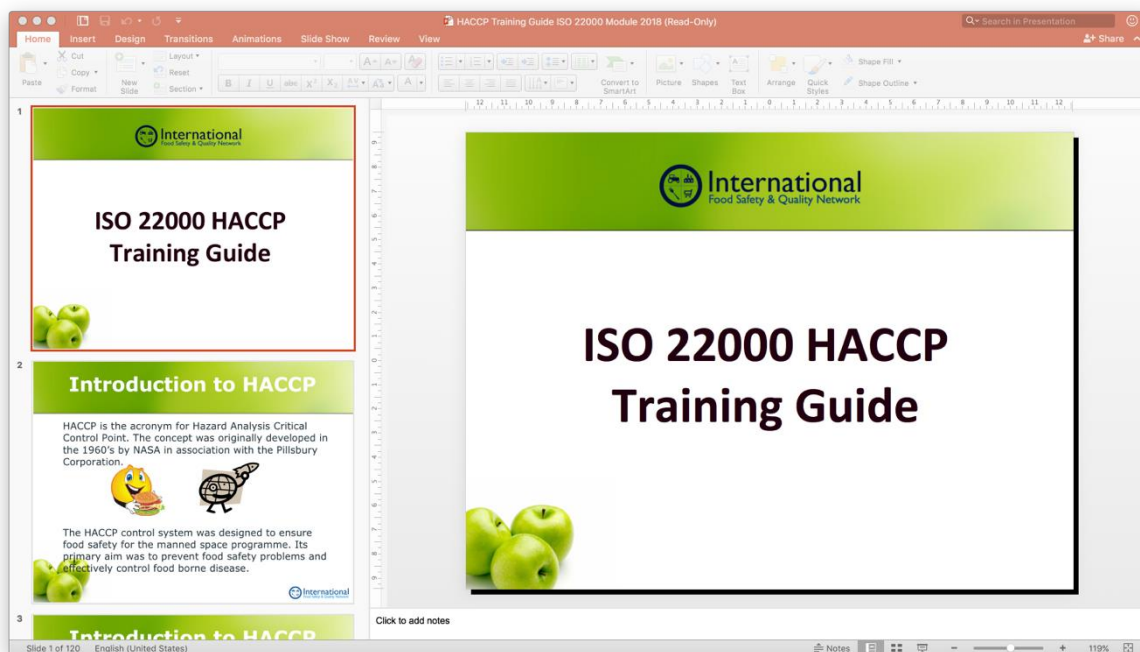
Food Safety Team: ISO 22000 Implementation Guide



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HACCP Training

An illustrated PowerPoint HACCP training presentation is supplied to train your food safety team.



The HACCP documents should be edited and procedures implemented by the Food Safety Team as per the plan.

8.5 Hazard control

FSMS 8.5.1 Preliminary steps to enable hazard analysis

FSMS 8.5.2 Hazard analysis

FSMS 8.5.3 Validation of control measure(s) and combinations of control measures

FSMS 8.5.4 Hazard control plan (HACCP/OPRP plan)

FSMS 8.6 Updating the information specifying the PRPs and the hazard control plan

FSMS 8.8 Verification related to PRPs and the hazard control plan

The Management Team will also be editing implementing procedures:

FSMS 8.1 Operational planning and control

FSMS 8.3 Traceability system

FSMS 8.4 Emergency preparedness and response

FSMS 8.7 Control of monitoring and measuring

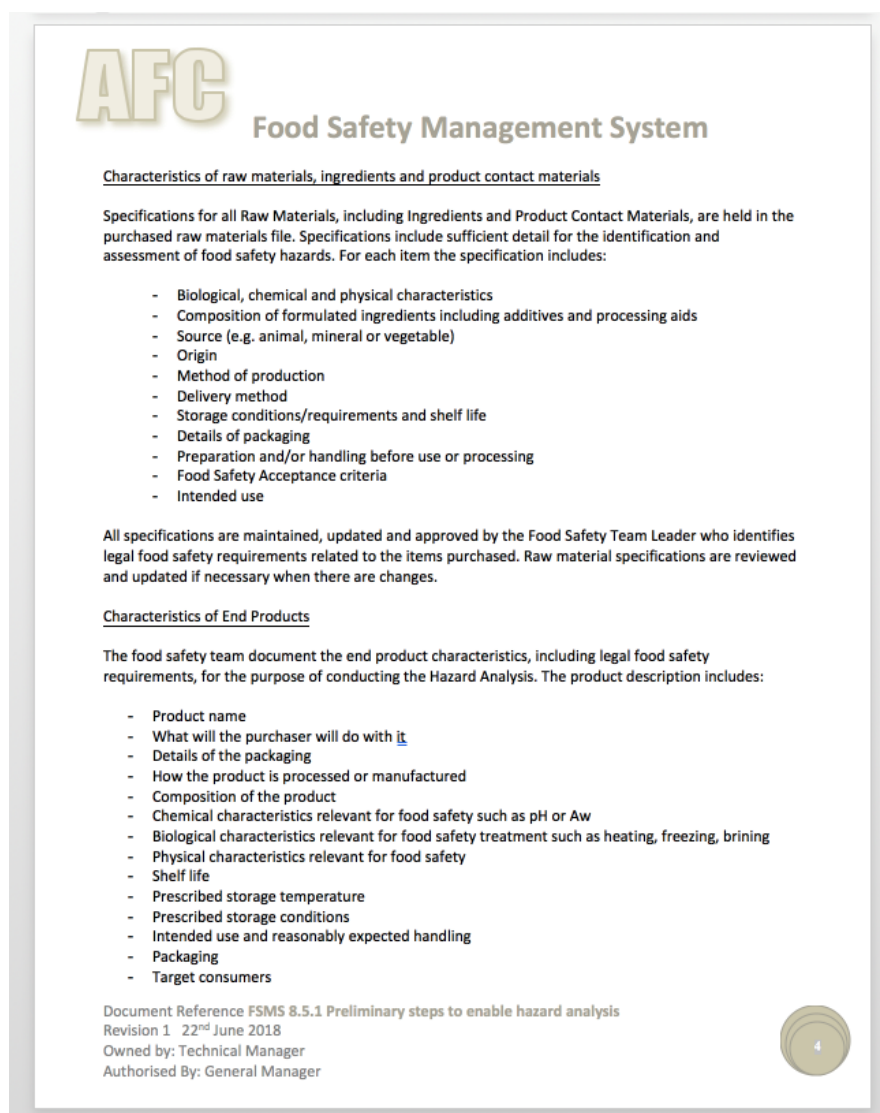
FSMS 8.9 Control of product and process nonconformities

FSMS 8.9.5 Withdrawal/recall

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8.5 Hazard control

The Food Safety Team should follow, edit and maintain HACCP document FSMS 8.5.1 Preliminary steps to enable hazard analysis



This document covers the following:

HACCP (Food Safety) Team

HACCP Scope

Characteristics of raw materials, ingredients and product contact materials

Characteristics of End Products

Intended Use

Preparation of the flow diagrams

The flow chart is confirmed physically on site by the Food Safety team who conduct a walk through verifying all steps in the process flow chart.

Description of processes and process environment

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Internal Audit Checklists

There is a checklist for each section of the ISO 22000 standard plus sample verification records for prerequisite programmes.

ISO 22000:2018 Audit Checklist

ISO 22000 Food Safety Management System Requirements Internal Audit	
ISO 22000 Clause	Audit Findings
8 Operation	
8.1 Operational planning and control	
Does the organization plan, implement, control, maintain and update the processes needed to meet requirements for the realization of safe products, and to implement the actions determined in 6.1, by:	
- establishing criteria for the processes?	
- implementing control of the processes in accordance with the criteria?	
- keeping documented information to the extent necessary to have the confidence to demonstrate that the processes have been carried out as planned?	
Does the organization control planned changes and review the consequences of unintended changes, taking action to mitigate any adverse effects, as necessary?	
Does the organization ensure that outsourced processes are controlled (see 7.1.6)?	
8.2 Prerequisite programmes (PRPs)	
8.2.1 Has the organization established, implemented, maintained and updated PRP(s) to facilitate the prevention and/or reduction of contaminants (including food safety hazards) in the products, product processing and work environment?	
8.2.2 Are the PRP(s):	
- appropriate to the organization and its context with regard to food safety?	
- appropriate to the size and type of the operation and the nature of the products being manufactured and/or handled?	
- implemented across the entire production system, either as programmes applicable in general or as programmes applicable to a	

Document Reference ISO 22000:2018 Audit Checklist 8 Operation
 Revision 1 21st June 2018
 Owned by: Technical Manager
 Authorised By: General Manager

ISO 22000 & ISO 22002-1 Audit Plan with Risk Rating

Step Eight: Review and Updating

Top Management and the Management Team follow procedures:

9 Performance evaluation

FSMS 9.1 Monitoring, measurement, analysis and evaluation

FSMS 9.3 Management review

10 Improvement

FSMS 10 Improvement

FSMS 9.1 Monitoring, measurement, analysis and evaluation

AFC Food Safety Management System

9.1 Monitoring, measurement, analysis and evaluation

Measuring and Monitoring

The company has identified and implemented the monitoring, measurement, and analytical processes required to maintain the food safety management system.

Measurement and Monitoring Procedures have been established, documented and implemented to meet Hazard Control Plan and PRP requirements.

Hazard Control Plan and PRP requirements are defined in the HACCP Manual and individual PRP procedures. The establishment of Hazard Control Plan control measures, monitoring procedures, critical control points, control limits, OPRPs, action criteria, corrections and corrective actions are documented in Hazard Control Plans and the HACCP Manual.

Quality requirements for measurement and monitoring have been designed using a similar approach to hazard analysis in identifying the monitoring, measurement, and analytical processes required to maintain product conformity to requirements. All the monitoring, measurement, and analytical processes required have been planned by following the process below which identifies the specific processes at each stage of manufacturing:

Stage 1	A flow diagram is prepared of the steps in the process. An analysis is conducted by identifying control options
Stage 2	The Control Points in the process are identified
Stage 3	Monitoring, measurement and analytical limits which must be met to ensure control are established
Stage 4	Measurement, monitoring and analysis procedures are established and scheduled for each stage.
Stage 5	The corrective action to be taken when limits are exceeded are established.
Stage 6	All procedures and records appropriate to the monitoring, measurement and analysis processes including acceptable limits at each stage are documented and implemented in a Product Control Plan. Methodology and Standard tests are specified in the Industry Code of Practice.
Stage 7	Verification that the monitoring, measurement and analysis processes are working effectively is carried out.

This system considers each stage of the process from ingredient intake to product despatch. Releases of ingredients, in-process and finished product are controlled and documented by authorised personnel.

Document Reference FSMS 9.1 Monitoring, measurement, analysis and evaluation
Revision 1 22nd June 2018
Owned by: Technical Manager
Authorised By: General Manager

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mitigate any adverse effects, as necessary?	
Does the organization ensure that outsourced processes are controlled (see 7.1.6)?	
8.2 Prerequisite programmes (PRPs)	
8.2.1 Has the organization established, implemented, maintained and updated PRP(s) to facilitate the prevention and/or reduction of contaminants (including food safety hazards) in the products, product processing and work environment.?	
8.2.2 Are the PRP(s):	
- appropriate to the organization and its context with regard to food safety?	
- appropriate to the size and type of the operation and the nature of the products being manufactured and/or handled?	
- implemented across the entire production system, either as programmes applicable in general or as programmes applicable to a particular product or process?	
- approved by the food safety team?	
8.2.3 When selecting and/or establishing PRP(s), does the organization ensure that applicable statutory, regulatory and mutually agreed customer requirements are identified?	
Has the organization considered:	
- the applicable part of the ISO/TS 22002 series?	
- applicable standards, codes of practice and guidelines?	
8.2.4 When establishing PRP(s) has the organization considered:	
- construction, lay-out of buildings and associated utilities?	
- lay-out of premises, including zoning, workspace and employee facilities?	
- supplies of air, water, energy and other utilities?	
- pest control, waste and sewage disposal and supporting services?	
- the suitability of equipment and its accessibility for cleaning and maintenance?	
- supplier approval and assurance processes (e.g. raw materials, ingredients, chemicals)	

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Does the plan comply with applicable legislation?			
Is the plan kept up-to-date?			
<u>2.5.5 Logo Use – Relevant to certified organizations</u>			
<u>2.5.6 Management of Allergens (Categories C, E, FI, G, I & K)</u>			
Is there a documented allergen management plan in place that includes:			
A risk assessment addressing potential sources of allergen cross-contamination?			
Control measures to reduce or eliminate the risk of cross contamination?			
<u>2.5.7 Environmental monitoring (for categories C, I and K only)</u>			
Is there a risk-based environmental monitoring program?			
Is there a documented procedure for the evaluation of the effectiveness of all controls on preventing contamination from the manufacturing environment?			
Does the documented procedure include, at a minimum, the evaluation of microbiological and allergen controls present			
<u>Formulation of Products (for category D)</u>			
<u>Transport and Delivery (for category FI only)</u>			