IFSQN

SQF CODE EDITION 8.1

Implementation Package
for Food Packaging
Manufacturers

IMPLEMENTATION WORKBOOK

International
Food Safety & Quality Network

This workbook is provided to assist in the implementation of your SQF Food Packaging Safety Management System Package.

The workbook is divided into 8 steps that are designed to assist you in implementing your food packaging safety management system effectively:

✓ Step One: Introducing the SQF Food Packaging Safety System
✓ Step Two: Senior Management Implementation
✓ Step Three: Food Packaging Safety Management Implementation
✓ Step Four: Good Manufacturing Practices Implementation
✓ Step Five: Project Planning
✓ Step Six: HACCP Implementation
✓ Step Seven: Training
✓ Step Eight: Final Steps to SQF Certification

Note: The IFSQN SQF Food Packaging Safety Management System Package includes a Start Up Guide which should be consulted to guide you through the contents of the package.
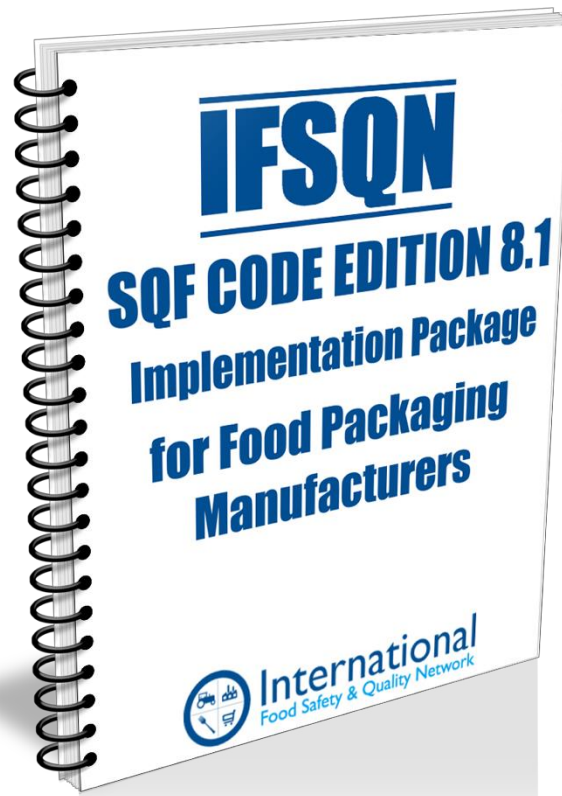
This Implementation Workbook compliments the IFSQN SQF Food Packaging Safety Management System Package which is an ideal package for organizations looking to meet the requirements of the SQF Food Safety Code for Manufacture of Food Packaging Edition 8

The IFSQN SQF Food Packaging Safety Management System Package contains:

✓ A comprehensive set of over 70 editable Food Packaging Safety Management System Procedures
✓ A range of 60 easy to use Record Templates
✓ Additional HACCP Manual including the HACCP Calculator
✓ Introduction to the SQF Food Packaging Safety Management System Training Modules
✓ Food Fraud Risk Assessment Tool
✓ Internal Auditor Training
✓ HACCP Training

And much more!

As a preliminary to Step 1 we recommend that you obtain a copy of the SQF Food Safety Code for Manufacture of Food Packaging Edition 8.1

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Step One: Introduction to SQF Food Safety Management System

Training Presentations for Module 2: SQF System Elements Manufacture of Food Packaging and Module 13: Good Manufacturing Practices for Production of Food Packaging are provided.

The presentations will introduce the SQF Food Packaging Safety Management System Package to the management team and explain how to start the process of implementing an SQF compliant Food Packaging Safety Management System.

Step Two: Senior Management Implementation

A Senior Management Implementation checklist is provided that establishes your Food Packaging Safety Management System fundamentals including Food Safety Policies and Objectives.

The checklist guides Senior Management:

- ✓ in planning the establishment of the FPSMS
- ✓ in providing adequate support to establish the FPSMS
- ✓ in ensuring there is adequate infrastructure and work environment
- ✓ in allocating responsibility and authority

This stage requires the Senior Management to meet and establish the foundations for the Food Safety Management System:

- ✓ Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Packaging Safety requirements
- ✓ Decide which Food Packaging Safety requirements the company should address and develop relevant policies.
- ✓ Based on the Food Safety Policy Management Policies establish Food Safety Objectives
- ✓ Define the scope and boundaries of the FPSMS
- ✓ Plan the establishment of the FPSMS using the project planner
- ✓ Provide adequate support to establish the FPSMS
- ✓ Ensure there is adequate infrastructure and work environment
- ✓ Allocate responsibility and authority
- ✓ Assess, plan and establish appropriate internal and external communication (including the food chain) channels

A meeting should now be coordinated involving all the Senior Management Team.

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Senior Management FSMS Implementation Meeting

<u>Date</u>

<u>Time</u>

<u>Venue</u>

<u>Agenda</u>

1. Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Packaging Safety requirements
2. Decide which Food Packaging Safety requirements the company should address and develop relevant policies.
3. Based on the Food Safety Policy Management Policies establish Food Safety Objectives
4. Define the scope and boundaries of the FPSMS
5. Plan the establishment of the FPSMS using the project planner
6. Provide adequate support to establish the FPSMS
7. Ensure there is adequate infrastructure and work environment
8. Allocate responsibility and authority
9. Assess, plan and establish appropriate internal and external communication (including the food chain) channels

<u>Attendees:</u>

Senior Management Team		
Job Title	**Name**	**Role in Team**
Managing Director		Chairman
Operations Manager		Operations Reporting
Quality 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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Senior Management FPSMS Implementation Checklist

The Senior Management FPSMS Implementation Meeting should follow the guidelines of the Senior Management Implementation Checklist:

	Senior management formulate a checklist of Customer, Regulatory, Statutory and other relevant Food Packaging Safety requirements	
Action (i)	Customer/Regulatory/Statutory/Other	Record Details
	XYZ Customer Requires this	
	SQF Code Edition 8.1 2019	
	Food Packaging Regulations	
	Senior Management decides which Food Packaging Safety requirements the company should address & develop relevant policies.	
Action (ii)	Requirement	Policy Details

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Food Safety Policy and Objectives

Food Safety Policy and Objectives

Food Safety Objectives

a) To maintain a standard of packaging manufacturing that complies with the SQF Food Safety Code for Manufacture of Food Packaging

b) To ensure that all food packaging is produced, stored, handled and transported in accordance with relevant legislative requirements.

c) To ensure that all premises used for the preparation of food packaging are registered with the appropriate Local Authority

d) To ensure that all risks associated with food packaging provision are reduced to a tolerable level

e) To ensure that all food packaging handlers have received basic food hygiene training

f) To ensure at all times that there is an authorized release of products only when they have been confirmed as complying with agreed specifications.

g) To ensure at all times that product released into the market place complies with relevant customer, statutory and regulatory requirements.

h) To endeavor, at all times, to maximize customer satisfaction and reduce complaint levels by 10% year on year.

i) To pro-actively promote and encourage a culture of continuous improvement within the company by measuring performance and taking action meet the following criteria:

- > 98% food safety audit score
- 100% investigation of incidences of ill health or injury.
- < 1% downgraded product
- > 99.9% compliance with microbiological criteria
- No major GMP non-conformances

Managing Director   ....

Date   ....

Document Reference QM 2.1.1 Food Safety Policy and Objectives
Revision 1   14th February 2020
Owned by: Quality Manager
Authorized By: Managing Director

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Senior Management provide adequate support to establish the FPSMS

Senior management establish and provide adequate support to establish the FSMS including the resource required to complete the implementation plan, establish, implement and maintain the Food Packaging Safety Management System, conduct Internal Audits and Monitor & Measure.

	Senior management provide adequate support to establish the FPSMS	
	Resource requirement	Details
Action (vi)	Food Packaging Safety Team Leader/SQF Practitioner	
	Food Packaging Safety Team	
	FPSMS Steering Group	
	Trainers	
	Internal Auditors	

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Key Personnel and Nominated Deputies

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

Senior Management Establish a Food Packaging Safety Team

Food Packaging Safety Team			
FPSMS Team	**Name**	**Position**	**Qualification**
FPSMS Team Leader			
FPSMS Assistant Leader			
FPSMS Team Members			

Senior Management Establish an Internal Audit Team

Internal Audit Team			
Team	**Name**	**Position**	**Qualification**
Team Leader			
Assistant Leader			
Team Members			

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Senior Management Establish a Product Recall/Crisis Management Team

Crisis Management/Product Recall Team			
Crisis	**Name**	**Crisis Coordinator**	**Contact Details**
Fire or Site evacuation		Safety Manager	
Flooding		Maintenance Manager	
Utility Supply failure		Maintenance Manager	
Storm Damage		Maintenance Manager	
IT systems failure		Operations Manager	
Water Supply Contamination		Quality Manager	
Breaches of security		General Manager	
Bomb Threat or Similar		General Manager	
Extortion or Sabotage		General Manager	
Hazardous Chemicals		Quality Manager	
Product quality or safety		Quality Manager	

Step Three: Food Packaging Safety Management System

The SQF Food Packaging Safety Management System Package contains a comprehensive top level Food Packaging Safety Management 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:

Food Packaging Safety Management System Procedures

QM 2.1.1 Food Safety Policy and Objectives
QM 2.1.2 Management Responsibility
QM 2.1.2A Appendix Organizational Chart
QM 2.1.2B Appendix Job Descriptions
QM 2.1.3 Management Review
QM 2.1.4 Complaint Management
QM 2.1.5 Crisis Management Planning
QM 2.2.1 Food Safety Management System
QM 2.2.2 Document Control
QM 2.2.3 Record Control
QM 2.3.1 Product Development
QM 2.3.2 Raw and Packaging Materials
QM 2.3.3 Contract Services
QM 2.3.4 Contract Manufacturers
QM 2.3.5 Finished Product Specifications
QM 2.4.1 Compliance with Food Legislation
QM 2.4.2 Good Manufacturing Practices
QM 2.4.3 Food Safety Plans
QM 2.4.4 Approved Supplier Program
QM 2.4.5 Control of Non-Conforming Product or Equipment
QM 2.4.6 Product Rework
QM 2.4.7 Product Release
QM 2.4.8 Environmental Monitoring
QM 2.5.1 Validation and Effectiveness
QM 2.5.2 Verification Activities
QM 2.5.3 Corrective Action and Preventative Action
QM 2.5.4 Product Sampling, Inspection and Analysis
QM 2.5.5 Internal Audits and Inspections
QM 2.6.1 Product Identification
QM 2.6.2 Product Traceability
QM 2.6.2 Identification and Traceability System – Appendix
QM 2.6.3 Product Withdrawal and Recall
QM 2.7.1 Food Defense Plan

QM 2.7.2 Food Fraud
QM 2.7.2A Food Fraud Raw Material Assessment Calculator
QM 2.8.1 Allergen Management
QM 2.9 Training
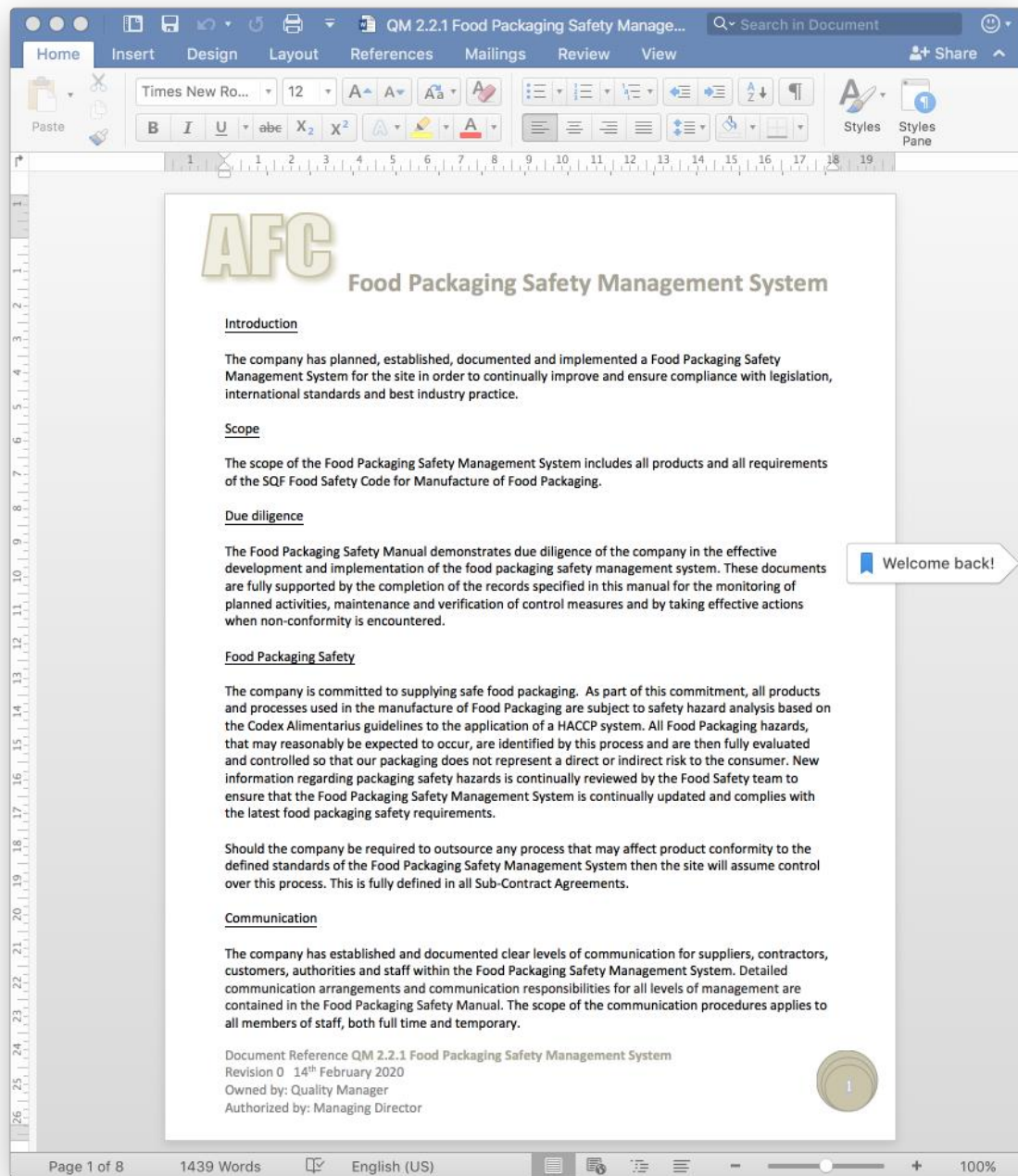
Project Plan

The Steering Group use the Excel Project Plan developed by Senior Management as a step by step guide to implementing the Food Safety Management System.
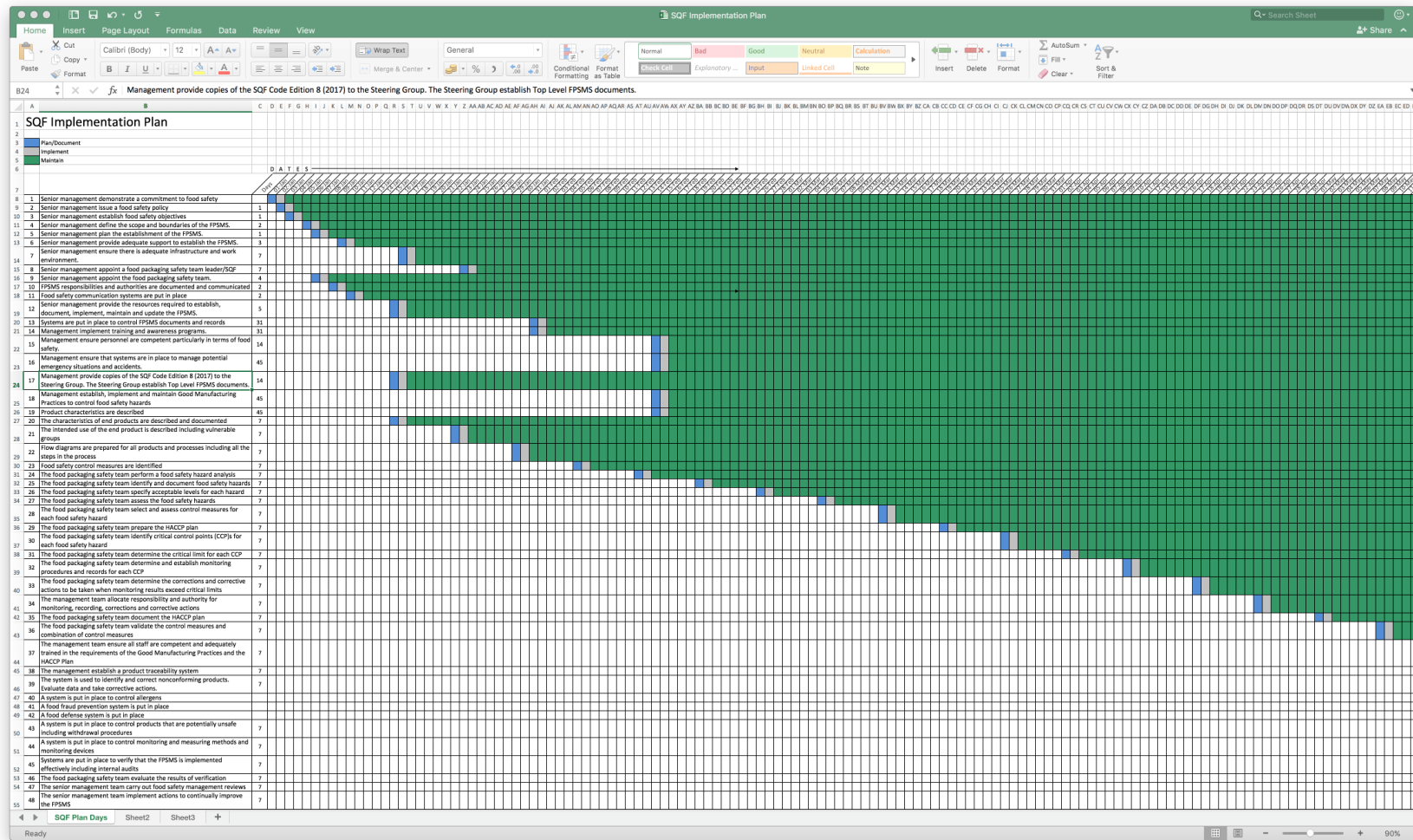
Project Planning Tasks	Responsibility	Comments	Due Date for Completion	Date Completed
1) Senior management demonstrate a commitment to food safety	Senior Management Team	Completed in Step 2		
2) Senior management issue a food safety policy	Senior Management Team	Completed in Step 2		
3) Senior management establish food safety objectives	Senior Management Team	Completed in Step 2		
4) Senior management define the scope and boundaries of the FPSMS.	Senior Management Team	Completed in Step 2		
5) Senior management plan the establishment of the FPSMS.	Senior Management Team	Completed in Step 2		
6) Senior management provide adequate support to establish the FPSMS.	Senior Management Team	Completed in Step 2		
7) Senior management ensure there is adequate infrastructure and work environment.	Senior Management Team	Completed in Step 2		
8) Senior management appoint a food packaging safety team leader/SQF Practitioner	Senior Management Team	Completed in Step 2		
9) Senior management appoint the food packaging safety team.	Senior Management Team	Completed in Step 2		
10) FPSMS responsibilities and authorities are documented and	Senior Management Team	Completed in Step 2		

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Step Six: HACCP Implementation Guide

Included in the package are QM 2.4.3 Food Safety Plans and supplementary HACCP documents in the HACCP Manual Folder including the Hazard Risk Management Planner:

Tasks 19 - 21

The HACCP study covers the process steps from:
Materials
Intake
Storage
Processing
Manufacture
Packing
Storage
Dispatch
Distribution

Scope is defined by consideration of the extent of the Food Packaging chain, product description and parameters, the intended consumer group and end-use.

Raw Materials

Specifications for all Raw Materials, including Ingredients and Product Contact Materials, are held in the purchased raw materials file. Specifications include sufficient detail for the identification and assessment of Food Packaging safety hazards. For each item the specification includes:

Biological, chemical and physical characteristics
Composition of formulated ingredients including additives and processing aids
Origin
Method of production
Delivery method
Storage conditions/requirements
Details of packaging
Preparation and/or handling before use or processing
Food Packaging Safety Acceptance criteria
Intended use

All specifications are maintained, updated and approved by the Food Packaging Safety Team leader who identifies legal Food Packaging safety requirements related to the items purchased. Raw material

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specifications are reviewed and updated if necessary when there is new design or redesign of the Food Packaging safety management system.

Product Description

The Food Packaging safety team document the finished product characteristics, including legal Food Packaging safety requirements, for the purpose of conducting the Hazard Analysis. The product description includes:

Product name
Composition
What the purchaser will do with it
Details of the packaging
How the product is processed or manufactured
Composition of the product
Chemical characteristics relevant for Food Packaging safety such as chemical migration
Biological characteristics relevant for Food Packaging safety
Physical characteristics relevant for Food Packaging safety including water vapor and gas permeability
Life
Prescribed storage temperature and conditions
Intended use and reasonably expected handling
Packaging
Target consumers
Possible unintended mishandling or misuse of the product
Where the product is stored
How the product is sold
Labelling Instructions for handling, preparation and usage
Prescribed delivery conditions

Finished product descriptions are reviewed and updated if necessary when there is new design or redesign of the Food Packaging Safety Management System.

Intended Use

The food packaging safety management team identify all possible uses for each product and process category including possible further processing and potential alternative use. Vulnerable consumer groups in particular are considered for each Food Packaging safety hazard.

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Flow Diagram Example
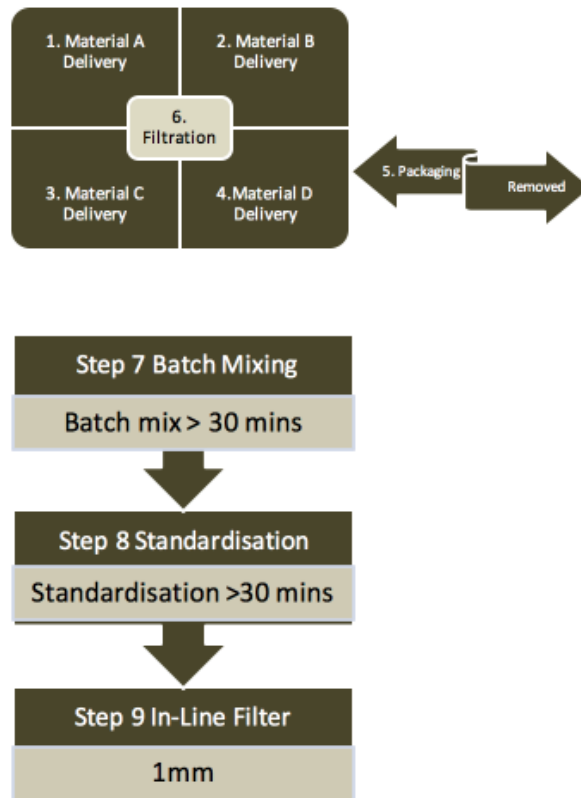
The steps in the process should be logged:

Task 35 The food packaging safety team document the HACCP plan

The Food Packaging Safety Team should complete the relevant columns in the Hazard Risk Management Planner Sheet:

Critical Limits	Monitoring Procedures	Corrective Action	Responsibility	HACCP Record
Minimum / Maximum acceptable levels to ensure condition is in control	- measurements to be taken (or observations) method of measurement - devices used (including applicable calibration procedures) - frequency of monitoring - responsibility and authority for monitoring and evaluation of the monitoring results	Action to be taken when outside of critical limits to regain control and ensure unsafe product is controlled	Who is taking the action	Where is it recorded

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The Food Packaging Safety Team should use the following Validation record as a template:

Control Measure Validation

Product Category			
Step Number			
Hazard			
Control Measure			
Validation Methods	**Applicable**		**Comments**
	Yes	**No**	
Third Party Scientific Validation			
Historical Knowledge			
Simulated Production Conditions			
Collection of Data in normal production			
Admissible in industrial practices			
Statistical Programs			
Mathematical Modelling			
Conclusion			
Internal Validation Required?			
If so by which method?			
CCP Confirmed			
Authorized by(Name):			
Signature:			

At this stage, you will now be able to complete Tasks 38 – 44 using the document templates provided:

Task 38: The management establish a product traceability system - QM 2.6.2 Product Traceability

Task 39: The system is used to identify and correct nonconforming products. Evaluate data and take corrective actions. - QM 2.4.5 Control of Non-Conforming Product or Equipment & QM 2.5.3 Corrective Action and Preventative Action

Task 40:   A system is put in place to control allergens - QM 2.8.1 Allergen Management

Task 41:   A food fraud prevention system is put in place - QM 2.7.2 Food Fraud

Task 42:   A food defense system is put in place - QM 2.7.1 Food Defense Plan

Task 43: A system is put in place to control products that are potentially unsafe including withdrawal procedures - QM 2.6.3 Product Withdrawal and Recall

Task 44: A system is put in place to control monitoring and measuring methods and monitoring devices - QM 13.2.9 Calibration

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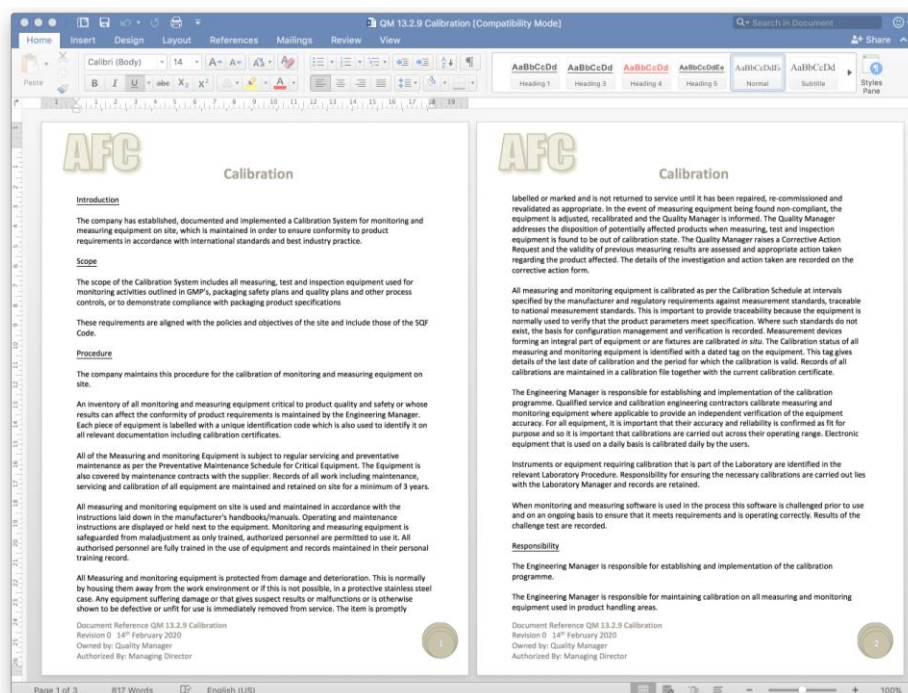
Step Seven: Training

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 safety responsibilities.

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

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

Basic SQF Code Training should be given to all staff and also include:

- ✓ Job/Task Performance
- ✓ Company Safety and Quality Policies and Procedures
- ✓ Good Manufacturing Practices
- ✓ Cleaning and Sanitation procedures
- ✓ HACCP
- ✓ Bio security and Food Defense
- ✓ Product Quality and Grading
- ✓ Chemical Control
- ✓ Hazard Communication
- ✓ Blood borne Pathogen
- ✓ Emergency Preparedness
- ✓ Employee Safety
- ✓ Safety Regulatory Requirements/Quality Regulatory Requirements

The Food Safety Team should receive extra training:

- ✓ Internal Audit Training (Conducted in Step Seven)
- ✓ HACCP Training

Remember all food packaging handlers should receive Basic Food Hygiene Training

HACCP Training

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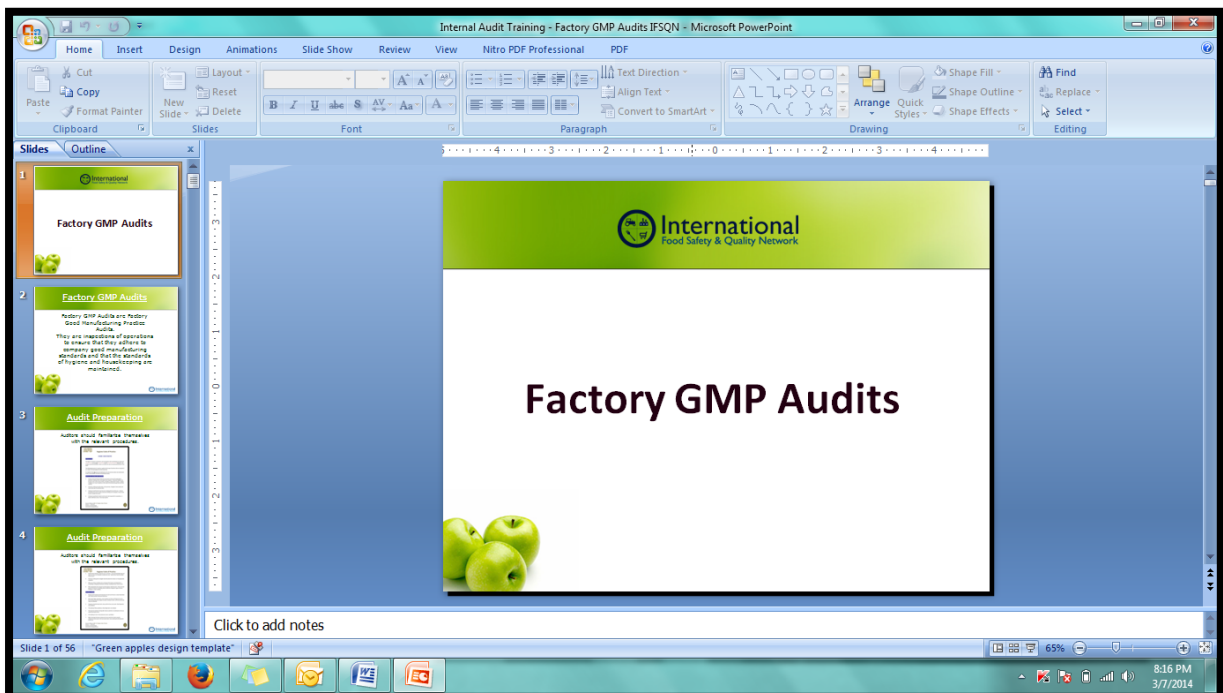

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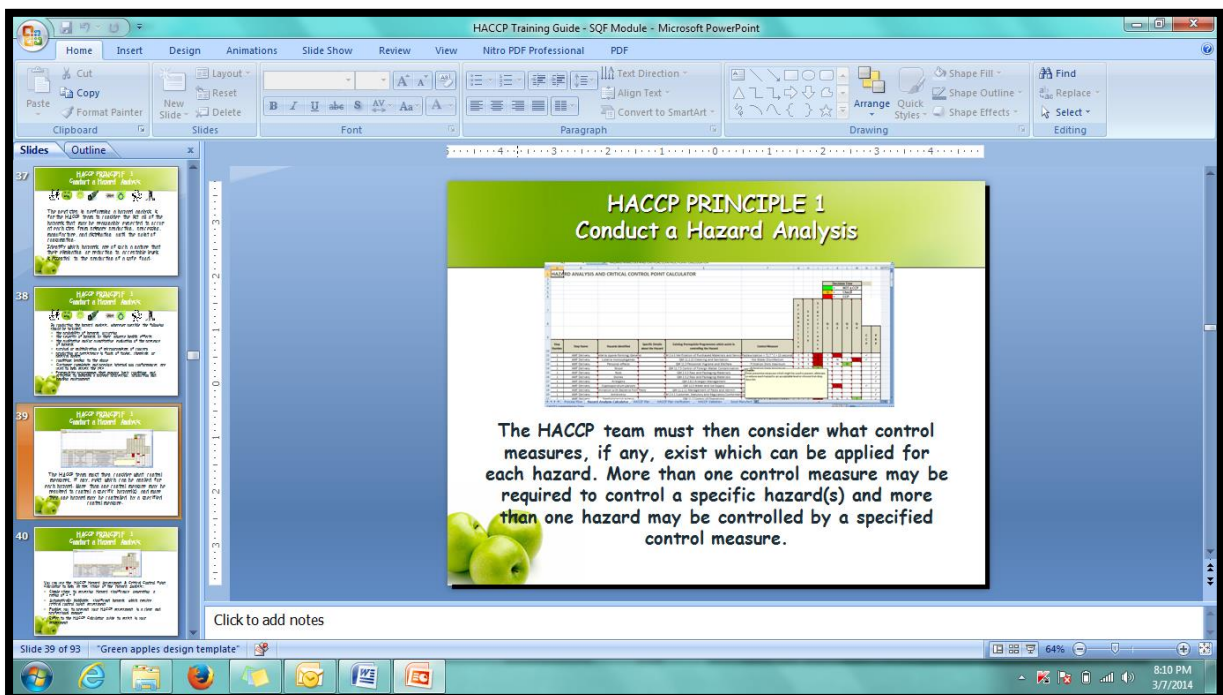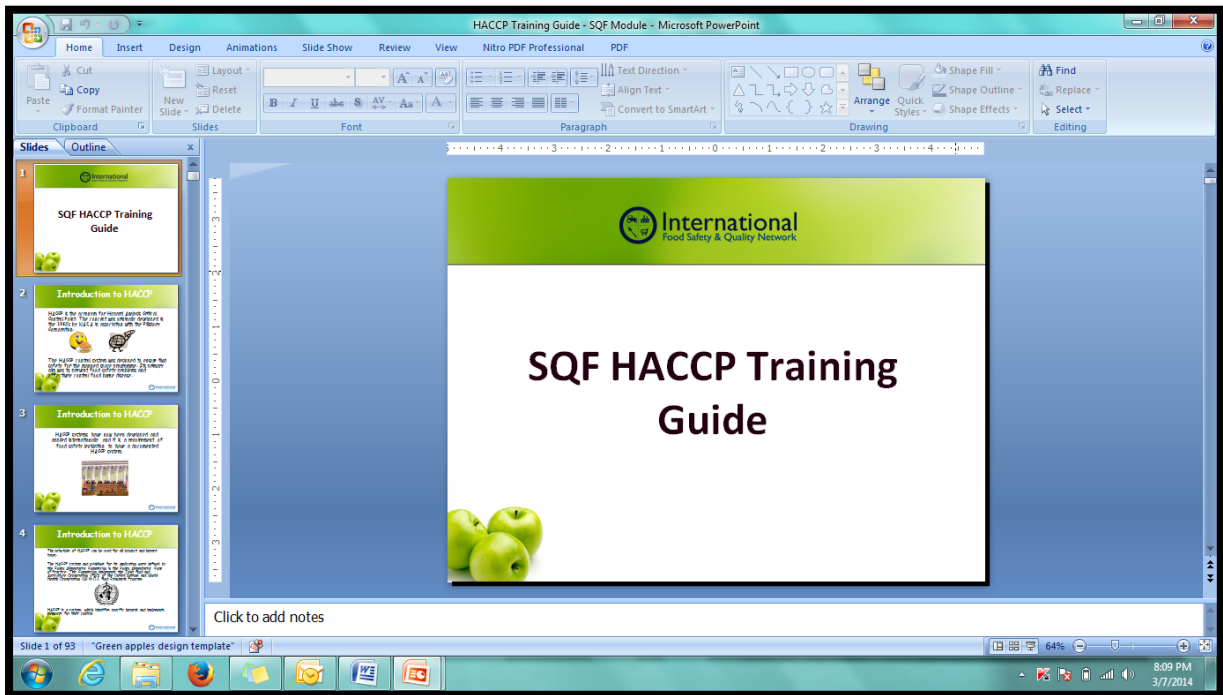
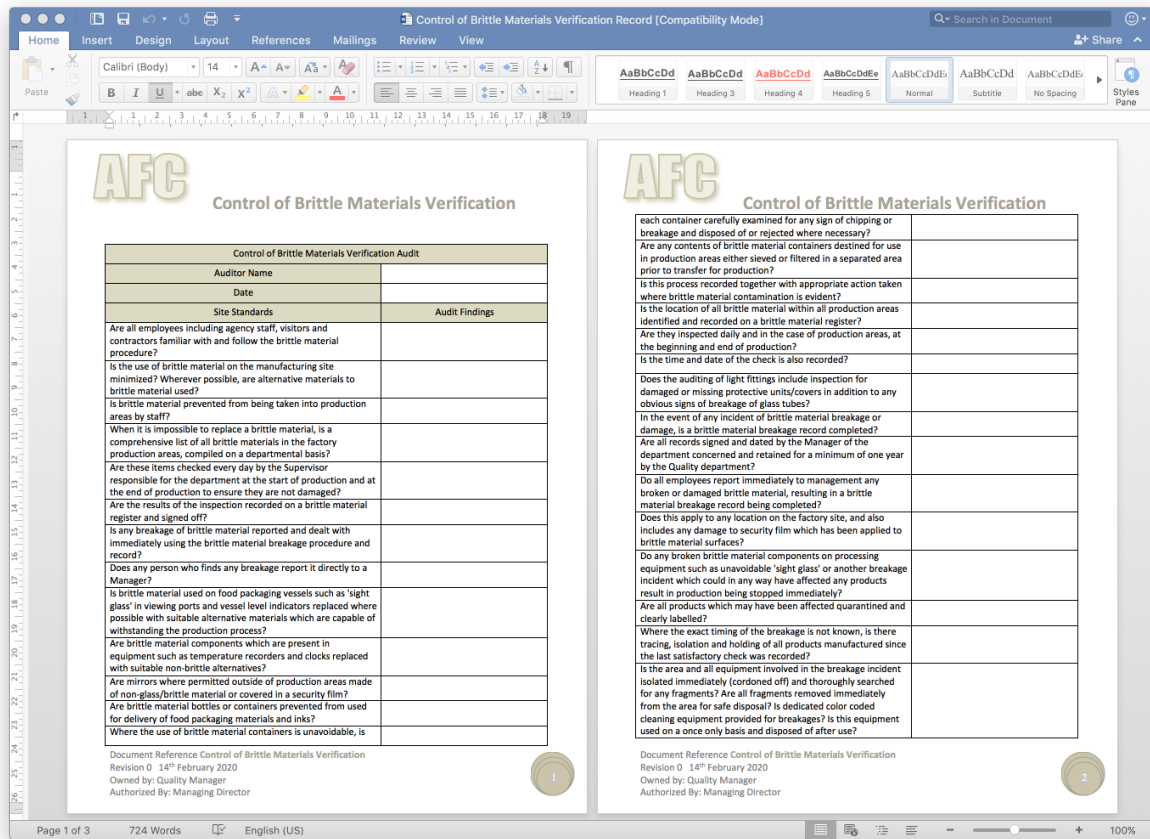## Internal Auditing Training & Checklists

Internal Auditor Training - An interactive and illustrated Internal Audit training presentation to train your Internal Audit procedure.
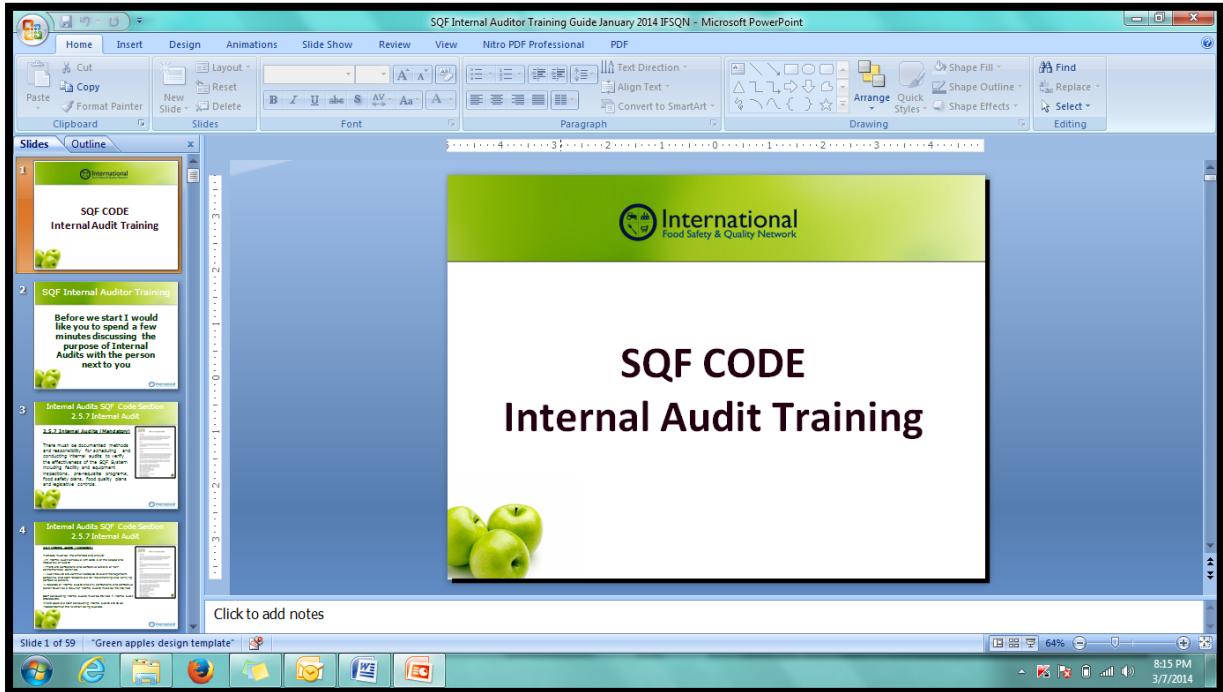
There is also a GMP audit training presentation provided.

Verification Record Example

Task 46 The food packaging safety team evaluate the results of verification activities

The Food Packaging Safety Team should define the methods, frequencies and responsibilities for verification activities. Verification activities should be put in place by the Food Packaging Safety Team to confirm the effective operation of the Food Packaging Safety Management System.

The aim of the evaluation of the results of verification activities by the Food Packaging Safety Team is to confirm that:

- ✓ Hazard Risk Management Plan is implemented and effective
- ✓ GMP(s) are implemented and effective
- ✓ Infrastructure and Maintenance standards are satisfactory
- ✓ Hazards are below identified acceptable levels
- ✓ All other procedures required for the effective operation of the Food Packaging Safety Management System are implemented and effective.

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<u>Senior Management Review Meeting Notification</u>

<u>Date</u>

<u>Time</u>

<u>Venue</u>

<u>Agenda</u>

1.   Review of the Food Packaging Safety Policy
2.   Review of Management Changes
3.   Minutes and Follow-up actions from previous review meetings
4.   Outstanding Non-conformances as a result of internal and external audits
5.   Results of external second and third-party audits
6.   Trend analysis of Customer and Supplier complaints
7.   Analysis of the results of verification activities including internal hygiene and Hazard Risk Management Plan verification audits
8.   Key Performance Indicators Review and trend analysis
9.   Emergencies and Accidents
10. Process performance and product conformity
11. Corrective and preventive action status
12. Food Safety incidents including allergen control and labelling, recalls, withdrawals, safety or legal issues
13. Review of planning and development of the processes needed for the realization of safe products including changes which could affect food safety and the Hazard Risk Management Plan (including legislation changes and scientific information)
14. Changes to policies and objectives
15. Communication activities and effectiveness of communication
16. Results of review and system updating
17. Review of Resources and effectiveness of Training
18. Recommended improvements
19. Customer Feedback and Sales levels are reviewed to give an indication of trends
20. A.O.B

Attendees:

Senior Management Team		
Job Title	**Name**	**Role in Team**
Managing Director		Chairman
Operations Manager		Operations Reporting
General Manager		Site Performance Reporting
Quality Manager		Food Packaging Safety Reporting SQF Practitioner
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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