CODE OF PRACTICE
AND TECHNICAL STANDARD

FOR

FOOD PROCESSORS AND SUPPLIERS
TO THE PUBLIC SECTOR

2013 Edition

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CONTENTS

Code of Practice

1.0 INTRODUCTION

1.1 This document outlines aspects of good manufacturing practice, storage and dispatch and where applicable legal requirements, which are standards required of food processors and suppliers that supply, or intend to supply food, ingredients and food related items to the Public Sector.

1.2 The objectives of the Code of Practice and Technical Standard are to:

- Enhance food safety
- Ensure consumer protection
- Strengthen consumer confidence and
- Improve cost effectiveness through the food supply chain

1.3 The Code of Practice and Technical Standard have been developed with the participation of technically competent personnel of interested parties and has been subject to formal review by the Independent Committee of STS.

1.4 The Code of Practice and Technical Standard shall be subject to period review and update, at least every three years, with the involvement of representatives of interested parties.

1.5 The latest Code of Practice will be down loadable from our supplier database. Food processors and suppliers will be notified by email of any update of the Codes of Practice and are recommended to download a copy for their records.

1.6 Compliance with the Code of Practice does not absolve food processors and suppliers from their legal obligations in terms of hygiene, safety or other food manufacturing criteria. Food processors and suppliers are advised to study the content of all pertinent legislation and guidance in full and to take heed of any proposed legislation that may necessitate changes in the sourcing, manufacturing, storage and distribution processes. Legal compliance must be demonstrated at all times.

1.7 Auditors, employed by Support, Training & Services Limited, must be allowed free access to all food production, preparation, storage and dispatch premises and vehicles, at any reasonable time, allowed to examine all relevant documentation and records. In addition product samples may be required for analysis by an independent UKAS accredited laboratory and this will be arranged by the STS auditor as part of the auditing process.

1.8 A copy of this Code of Practice and Technical Standard shall be held on site by the supplier.

1.9 The operative date of this issue of the Standard is 1 October 2013.

2.0 SCOPE OF STANDARD

2.1 This standard has been developed to cover all activities which may affect food safety, quality and legality of products being manufactured and/or stored and/or dispatched.

3.0 SCOPE OF AUDITED COMPANY OPERATIONS

3.1 The standard applies to companies providing manufacture and/or storage and/or dispatch of products. It can also be applied to those companies that operate a wholesale operation, where a company operates a wholesale business and has storage and dispatch facilities under its direct control. The standard will be applied to the whole operation. Where there is no associated manufacture or storage and dispatch premises at the audit location, the standard may be applied in part for the applicable clauses for wholesaling but the certification scope and certification documents should reflect that no manufacturing or storage and dispatch operations have been directly audited.

3.2 The manufacture and/or storage and/or dispatch operations to which the Standard may be applied can be at production, warehouse or administrative locations.

3.3 The dispatch of products may be by road, rail, air freight or ship. The audit of the dispatch activity is limited to the review of the transport vessel, and the loading of that vessel, but does not extend to beyond the audit location premises.

3.4 The standard covers food safety quality and legality for food products, which may be:

- Manufacture of ingredients for further processing
- Manufacture of finished products
- Manufacture of part prepared products e.g. cook-chill, souse vide, cook-freeze
- Warehousing of products, ambient, chill and frozen
- Storage and dispatch of own products
- Storage and dispatch of product produced by others
- Wholesale operation
- Head Office operation

NOTE: Head Office sites can only be certified as part of a programme of certification of associated manufacturing or storage and dictibution sites.

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

4.0 SCOPE OF APPLICABLE PRODUCTS

4.1 The scope covered by this Standard is for all food product commodities that may be purchased, utilised and consumed within Public Sector operations e.g. hospitals, schools, care homes, local authority premises.

4.2 This standard does not apply to:

- Live animals (except crustacea for human consumption)
- Loose or unprocessed bulk agricultural products

5.0 NON-APPLICABLE CLAUSES

5.1 There are some clauses that apply specifically to manufacturing operations and some others that are specific to storage facilities which may not be applicable to a site being audited. Wholesale operations which function from a remote office with no associated manufacturing or storage or dispatch facilities will be subject to audit only against the documentary aspects of the management control of the food commodities. Where elements of the standard are not pertinent to the scope of the sites activities these specific requirements may be excluded and will be identified as not applicable (N/A) in the final audit report. The final audit report will include comments on any clauses deemed as not applicable or excluded. The auditor will assess and decide on the applicability of any clauses that are perceived not applicable.

5.2 Operations shall be reviewed for their applicability to certification and the pertinent requirements of this Standard, especially where a company operates only part of the scope of the overall Standard.

5.3 Wherever an operation subcontracts activity that could impact on the safety, quality or legality of the food product, the contract and other documentary checks should be included in the audit process to confirm management control of the process.

5.4

6.0 AUDIT AND MONITORING PROCEDURES

6.1. On instructions an introduction pack will be sent to the food processor. The pre-audit questionnaire and terms of business should be completed and returned as soon as possible with copies of the last enforcement officer's report for food standards (ie composition and labelling), where appropriate, and food hygiene, Food Standards Agency report, where appropriate, and any notices served in the last twelve months so that the food processor's operation, location(s), size, existing controls and systems can be identified and the auditor prepared for the audit.

6.2. In respect of initial audits, the duration of the visit shall be determined having due regard to:

- The type of activity undertaken
- The product risk factor
- The condition under which the product is packaged and stored.
- The intended method of preparation of the food by the customer
- The number of sites to be audited and product range
- The number of employees/size of operation.

6.3. Following review of site details the food processor will be advised on the duration of the initial audit, the scope and fees. The audit date cannot be booked until full payment has been received.

6.4. Renewal of certification will include surveillance visits, which shall be executed at at a maximum frequency of 12 months. The duration of the surveillance visit shall be determined with due regard to:

- The findings of the previous visit
- The type of process(es) used
- The conditions under which the product(s) is stored and sold

- The method of preparation of the food by the customers
- The number of sites and products
- The number of employees/size of operation

6.5. Surveillance visits shall be executed every six months in respect of the following process or circumstances:

- Manufacturers of high risk ready-to-eat products e.g. sandwiches, sandwich fillings, soft cheese, pate, etc with regard to *Listeria monocytogenes*
- Handling of open/unpacked raw and cooked meat or meat products
- Cook-chill and sous-vide production
- Thermal processing, low acid foods
- Aseptic packaging, low acid foods

6.6. An additional surveillance visit may be required in the following circumstances:

- Relocation to new premises
- Modifications to the certified process
- New processes/products
- Outstanding non-conformances
- Product recall, withdrawal or incident

Client request

6.7. The audit shall ensure that the supplier has in place documentation and systems and can demonstrate compliance with this Standard. The evaluation shall be executed in three phases, a documentation review; and inspection of the premises and process; and the review of the implementation of the documented system supporting the processes. To maintain certification the Company shall be demonstrate commitment to ensuring and maintaining compliance with the requirements of this Standard at all times.

6.8. A minimum of 50% of the audit duration shall be spent physically auditing the site and processes. In respect of the report preparation, audit notes, sign off of any non-conformities and responding to issues post-audit a minimum off-site duration shall be 3 hours (½ day).

6.9. In the event that the Company becomes aware of possible legal proceedings with respect to product safety or legality, or is in receipt of a formal notice, the Company shall immediately notify STS. STS shall take appropriate steps to assess the situation and any implications for the certification and to take any appropriate action.

6.10. In the event that the Company becomes aware that pathogens including *Listeria monocytogenes* are detected in food and environmental samples, whether taken by the Company or another party, the Company shall immediately notify STS, and where appropriate the local authority, and keep STS informed in respect of the proposed corrective action and re-sampling results. STS shall take appropriate steps to assess the situation and any implications for the certification and to take any appropriate action.

6.11.

In the event of a product recall, withdrawal or incident, the Company shall inform the local authority, Food Standards Agency and STS immediately of the situation and provide details relating to the incident. STS shall take appropriate steps to assess the situation, have regard to any investigation by the local authority, and any implications on the certification and to take any appropriate action.

6.12. Prior to the commencement of the audit, an opening meeting will be held with nominated management from the Company to:

Introduce the auditor and company representatives

Ensure the scope, coverage and timing of the visit are clearly understood and personnel required are available

Ensure the Company representative(s) understand the audit purpose

Confirm that all findings will be treated in strict confidence.

Confirm that arrangements have been made for an office or base to be made available to the auditor.

(It is appreciated that the audit programme may need to be altered for unannounced audits).

6.13. Throughout the audit of the operation the Company Quality Assurance/Technical Manager or another appropriate manager should accompany the auditor.

6.14. As part of the audit, a closing meeting will be held with nominated management from the Company to:

Remind those present of the scope and objectives agreed at the opening meeting

Confirm the position with regard to any observations made to the supplier's representatives during the audit

Clearly provide in writing any non-compliance's noted during the audit against the requirements

Summarise the overall acceptability of the operation in the light of the non-compliances found thereby indicating the severity of those non-compliances. The auditor may propose a recommendation for certification status, but the final decision shall remain that of the certification body.

Agree an action plan for the supplier to correct the non-compliances against an appropriate timescale and agree follow up and confirmation of corrective actions ("appropriate" timescale will take into account the nature of the work and the ease of achieving compliance), e.g. cleaning/not completing records – immediate

Where appropriate, agree the date of the next audit.

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

There are three levels of non-conformity:

Critical:
There is a critical failure to comply with a clause of the standard, which presents an imminent food safety risk.

Major:
There is a substantial failure to comply with a clause of the standard, but does not present an imminent food safety, quality or legal risk.

Minor:
There is a minor failure to comply with a clause of the standard, but does not present a food safety, quality or legal risk.

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

6.16 In respect of major non-conformities:

(a) for initial certification the Company shall not gain certification. There shall be a full re-evaluation, at the Company's expense, carried out to demonstrate compliance

(b) for a renewal of certification surveillance evaluation, major non-conformities shall be corrected within 28 days to ensure renewed certification. A certificate shall not be issued until the Company has provided satisfactory objective evidence. In the case of five or more major non-conformities, or where evidence can only be demonstrated on site, a further re-evaluation shall be necessary to demonstrate compliance, at the Company's expense.

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

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

Approved	Where the organisation assessed has no non-conformances or whilst it does not fully satisfy the requirements of this standard it can demonstrate an acceptable level of control of the products supplied or processes undertaken, the non-conformities raised do not present an imminent risk, can be corrected within 28 days and the company commits to meeting this timescale.
Not Approved	Where the non-conformances identified are of such a nature or extent that the imminent safety and/or legality of the product or processes undertaken cannot be assured (critical) Where a major non-conformity is raised during the initial assessment

6.19 For certified companies, where deemed appropriate, further visits, product sampling and/or information requests to validate continued certification may be carried out. These visits may take the form of announced or unannounced visits to either undertake a full or part evaluation. Unannounced audits may be undertaken at the specific request of a client; following notified incidents, recalls or withdrawals; in the case of reoccurring or serious food complaints and/or concerns raised by enforcement authorities.

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

(a) failure to progress re-evaluation in a timely manner
(b) critical non-conformity
(c) failure to provide objective evidence in respect of non-conformities, or arrange re-evaluation to assess compliance, in a timely manner
(d) failure to maintain standards confirmed by further visits (announced or unannounced), product sampling or information provided
(e) failure to allow the STS auditor unencumbered access to all appropriate areas and documents
(f) serious or re-occurring food complaints
(g) withholding information in respect of enforcement action

(h) failure to notify STS in respect of legal action or product recall, withdrawal or incident
(i) where enforcement authorities are preparing/taking legal action
(j) product contamination

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

(a) one copy to the nominated company representative

(b) one copy to each public sector agency, as appropriate

(c) on demand by any Trust, hospital etc.

(d) to enforcement authorities, as required

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

6.23 The re-evaluation audit shall be undertaken before the expiry of the appropriate evaluation frequency in order to maintain certification.

6.24 The evaluation report and associated information shall be stored safety and securely for a period of five years by STS.

6.25 Whilst the certificate is issued to the Company, it remains the property of Support, Training & Services Limited and must be returned on request.

6.26 If certification is withdrawn, suspended or not maintained, the Company must withdraw from displaying the certificate and remove all reference from publicity material, etc.

6.27 Products produced, stored or dispatched under this Code of Practice and Technical Standard shall not be labelled, marked or described in a manner, which implies that they meet this standard.

6.28 Support, Training & Services Limited operates a complaints and appeals procedure, details of which are available on request.

7.0 Auditor Qualifications, Training and Experience

7.1 Qualification

7.1.1 The Auditor shall have undertaken such further education that shall enable them to register as an Environmental Health Practitioner with the Chartered Institute of Environmental Health or comparable qualifications.

7.2 Training

7.2.1 The auditor shall have successfully completed a QMS lead assessor course or the BRC third party auditor course and have undergone a supervised period of training in practical assessment.

7.2.2 The auditor shall have successfully completed training in HACCP based on the principles from Codex Alimentarius and be able to demonstrate competence in the understanding and application of HACCP principles.

7.3 Experience

7.3.1 The auditor shall have a minimum of five years experience relevant to the food industry.

7.3.2 The auditor shall perform a minimum of five relevant audits per year. Where an auditor has not achieved the minimum in any twelve month period they shall be subject to re-assessment by a Lead Auditor.

7.3.3 Each auditor will be assessed by a competent Lead Auditor in the sector every twenty-four months unless they have been assessed by an external body e.g. UKAS in that time.

7.4 Training Records

7.4.1 Records shall be maintained to demonstrate that every auditor has appropriate and up-to-date training and experience for the particular fields for which they are considered competent.

TECHNICAL STANDARD – FOOD PROCESSORS AND SUPPLIERS

8.0 Food Safety Management System

8.1 General Requirements

8.1.1 The Company shall have a food safety management system, which is based on the principles of Hazard Analysis Critical Control Point (HACCP), which shall be documented, maintained, implemented and continually improved. The system will have a scope appropriate to the range of business activities to be covered, including documented procedures or specific reference to them and describing the interaction of the related processes.

8.1.2 The Company shall have a clear, concise and documented food safety policy statement and objectives that specifies the extent of the organisation's commitment to meet the safety, legality and quality needs of its products.

8.1.3 The food safety management system shall be developed, reviewed and managed by a competent, experienced and appropriately trained team, which should include representation from all appropriate areas of the business.

8.1.4 The food safety management system shall have management and staff commitment to the implementation, development and improvement of the system.

8.1.5 The Company shall establish and document a clear organisational structure that unambiguously defines and documents job function, responsibilities and reporting relationships, especially in respect of activities which affect product safety, legality and quality.

8.1.6 The Company shall use Codex Alimentarius HACCP principles to:

Undertake a comprehensive hazard analysis
Determine the Critical Control Points (CCPs)
Establish critical limits
Establish a system, to monitor control of the CCPs

Establish the corrective actions to be taken when monitoring indicates that a particular CCP is not under control
Establish procedures of validation and verification to confirm that the HACCP system is working effectively, including audit of the HACCP system
Establish documentation concerning all procedures and records appropriate to these principles and their application, having regard to the nature and size of the business.

8.1.7 The Company shall incorporate into their food safety management system (or provide a separate document), a clearly defined and documented quality management system incorporating a quality policy statement, which shall state the company's intentions to meet its obligations to produce quality products that meet safety and legal requirements.

8.1.8 The food safety management system shall document a prerequisite programme, including Good Manufacturing Practice, Personal Hygiene, Training, Pest Control, Structure and Equipment and Cleaning.

8.1.9 The Company's senior management shall review the effectiveness of the food safety management system at appropriate planned intervals, to ensure its continuing suitability, adequacy and effectiveness. Such a review will evaluate the need for changes to the food safety management system, including the food safety policy and the quality policy.

8.1.10 Verification checks shall be undertaken to demonstrate that the documented procedures are working reliably. Verification shall be undertaken periodically at frequencies sufficient to show that all procedures are operating effectively, whenever new or amended procedures are put in place and following maintenance work.

8.2 Resource Management

8.2.1 The Company's senior management shall determine and provide, in a timely manner, all the resources necessary to implement, maintain and improve the process of the food safety management system and to address customer satisfaction.

8.3 Document Control

8.3.1 The Company shall ensure that all documents and records required to demonstrate the effective operation and control of its processes and its management of product safety, legality and quality, are securely stored, effectively controlled and readily accessible when needed.

8.3.2 The company shall maintain a system of documentation control which ensures all documents are properly authorised; obsolete documents are rescinded and replaced, where appropriate, with a revised version; and that replaced documents are retained for an established period to respond to any safety, legality and quality issues.

8.4 Specifications

8.4.1 The Company shall ensure that comprehensive specifications are maintained, authorised and regularly reviewed, in respect of:

- raw materials (including packaging)
- intermediate products
- finished products

8.4.2 The specifications to be securely stored and made readily accessible when needed.

8.4.3 Specifications shall be authorised and, where appropriate, be agreed with relevant parties.

8.5 Procedures

8.5.1 The Company shall ensure that comprehensive procedures and/or work instructions are documented, maintained, implemented and reviewed for all process and operations having an impact on product safety, legality and quality. Such documentation to be securely stored and readily accessible when needed.

8.6 Records

8.6.1 The Company shall ensure that comprehensive records are maintained in accordance with the food safety management system and specifically in respect of the records required in accordance with the HACCP assessment (including analysts certificates for food standards and traceability). Such documentation to be securely stored and readily accessible when needed.

8.6.2 The Company shall ensure that all records are retained for an established period to respond to any safety, legality and quality issues.

8.7 Internal Audit

8.7.1 The Company shall have an internal audit system in place in relation to all systems and procedures, which impact upon product safety, legality and quality.

8.7.2 The internal audit frequency shall be programmed in relation to the risks associated with the activity

8.7.3 The results of all programmed internal audits and associated corrective actions shall be maintained and the results bought to the attention of the management responsible for the activity audited, for necessary action.

8.7.4 Any corrective actions required following an internal audit should have a timescale for completion. On completion a record of the corrective action taken and date completed shall be retained with the appropriate internal audit record.

8.7.5 Where alternative corrective action is taken or timescales are not achieved a record of the circumstances and/or amended timescale should be retained with the appropriate internal audit record.

8.7.6 Internal auditors shall be idependent of the ares they are to audit and have completed suitable training.

8.8 Corrective Action

8.8.1 The Company shall ensure that procedures for the determination and implementation of corrective action in the event of any non-conformance

relating to product safety, legality and quality are prepared and documented and that all such documentation is securely stored and readily accessible when needed.

8.9 Control of Non-conformity

8.9.1 The Company shall ensure that procedures for the control of any product, which does not conform to safety, legality and quality requirements, are prepared and documented and that all such documentation is securely stored and readily accessible when needed.

8.10 Product Release

8.10.1 The Company shall ensure that procedures for appropriate product release are prepared and documented and that such documentation is securely stored and readily accessible when needed.

8.11 Purchasing and Contracted Services

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

8.11.2 The Company shall operate procedures for the selection, approval and continued monitoring of its suppliers, which impact upon product safety, legality and quality. The results of evaluations and follow up actions shall be recorded, records to be retained for a period established to respond to any safety, legality and quality issues.

8.11.3 Where the Company undertake their own physical assessment of its suppliers they shall demonstrate that the auditor is suitably trained and experienced.

8.12 Product Identification and Traceability

8.12.1 The Company shall develop and maintain appropriate procedures and systems to ensure the identification, at any stage of processing or production and any out sourced product, ingredient or service. Such procedures to be documented and such documentation to be securely stored and readily accessible when needed.

8.12.2 The Company shall develop and maintain appropriate procedures and systems to ensure the identification of the purchaser and delivery destination for all products supplied. Such procedures to be documented and such documentation to be securely stored and readily accessible when needed.

8.12.3 In respect of meat products traceability is to be available to the manufacturer back to the farm and periodically, according to risk, a traceability exercise back to the farm is to be undertaken.

8.12.4 In respect of product wholesalers they must be able to demonstrate that their suppliers/manufacturers maintain traceability back to the farm in respect of meat products. Periodically, according to risk, the distributor should request from their supplier/manufacturer a traceability exercise back to the farm.

8.13 Complaint Handling

8.13.1 The Company shall develop, maintain and implement an effective system, for the management of product complaints. The system to be documented and such documentation to be securely stored and readily accessible when needed.

8.13.2 The Company shall periodically review product complaint data, according to risk and frequency of complaints, especially re-occurring issues, to identify any trends and evidence of shortcomings in food safety, legality and quality. Such reviews to be documented with any corrective action taken to prevent a reoccurrence.

8.14 Product Recall, Product Withdrawal and Incident Management

8.14.1 The Company shall develop, maintain and implement effective incident management procedures for product withdrawal and recall in the case of product safety, legality and quality . The procedure is to be documented and such documentation to be securely stored and readily accessible when needed. A list of key contacts in the event of a recall shall be maintained.

8.14.2 The procedure shall be regularly tested according to risk (at least yearly) to ensure its effectiveness and a record of the test and any necessary corrective action retained.

8.14.3 The procedure shall be regularly reviewed and, if necessary, revised having regard to any test results and legislative changes.

8.14.4 The Company shall ensure that any product withdrawn or recalled is either suitably disposed of so as to ensure it cannot re-enter the food chain or is suitably treated or reworked to ensure it complies with food safety requirements.

8.14.5 In respect of any product recall, product withdrawal and incident, the Company shall immediately notify the certifying body, LA and FSA.

8.13.6 Comprehensive documentation of any product withdrawal or recall is to be maintained, including the minutes/action notes of the recall/incident team, notices issued to the press, customers, etc., product supplied, customers supplied, product accounted for and the method of disposal and verification of such action.

8.15 Control of Measuring and Monitoring Devices

8.15.1 The Company shall identify the measurements impacting upon food safety, legality and quality and the measuring and monitoring devices required to assure product safety, legality and quality and methods to assure calibration and accuracy.

8.15.2 The Company shall document the measuring and monitoring devices requiring calibration and the frequency of calibration to assure product safety, legality and quality. The Company shall maintain records of calibration and such records to be securely stored and readily accessible when needed.

8.16 Product Analysis

8.16.1 The Company shall establish, implement and maintain a sampling plan to ensure that product and ingredient analysis critical to the confirmation of product safety, legality and quality is undertaken. The plan shall include shelf-

life testing and environmental sampling. In respect of composition, authenticity and product description (eg content, nutritional values, fat content, etc.) testing should be carried out periodically according to risk or to validate any claim. In respect of the manufacture and handling of high risk ready-to-eat products with regard to *Listeria monocytogenes* the shelf-life testing shall reflect the temperatures stored in client premises, including four hours storage in ambient conditions. Tests should also be undertaken to demonstrate the outcome of temperature abuse during storage by the customer.

8.16.2 The analysis shall conform to recognised standards. The certificates of conformity from the laboratory shall stipulate the standard methods utilised and any departure from these standards.

8.16.3 The analysis shall be undertaken by a laboratory that has gained and maintained recognised laboratory accreditation, e.g. UKAS. The certificates of conformity from the laboratory should clarify which examinations are covered by the accreditation and which are excluded.

8.16.4 Where analysis is undertaken directly by Company personnel, the Company shall demonstrate that the personnel are suitably qualified and/or trained to carry out such work.

8.16.5 Where analysis is undertaken at the same location as the food production, the company shall ensure the necessary controls to prevent product, plant or personnel contamination are implemented and documented as part of the HACCP plan.

8.16.6 The Company shall establish “physical” properties, microbiological standards, food standards, quality and composition standards, where appropriate, for the products and ingredients, having regard to any legislative requirements and good manufacturing practice.

8.16.7 Manufactured products that support the growth and multiplication of *Listeria monocytogenes* to be sampled as part of the sampling plan and the critical limit for manufacturer to be set as absence. Any sample failing to meet this standard, including those taken by other parties, must be notified to STS immediately.

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

8.16.9 The Company shall have in place a detailed action plan to respond to any sample failures.

8.16.10 Where a product, ingredient, shelf-life test or environmental sample fails to meet the “physical”, microbiological and/or chemical standards, the Company shall document the corrective action and the steps taken to prevent a reoccurrence and contact the LA and FSA, where appropriate. Full details and corrective action to be notified to STS, in a timely manner.

9.0 Establishment: Design and Facilities

9.1 Location

9.1.1 The site shall be located and maintained so as to prevent contamination and enable the production of safe and legal products.

9.1.2 Establishments shall be located in areas, which are free from objectionable odours, smoke, dust or other contaminations and are not subject to flooding.

9.1.3 All grounds within the site shall be finished and maintained to an appropriate standard.

9.1.4 Such roadways and areas serving the establishment, which are within its boundaries, shall be suitably surfaced, well maintained, provided with appropriate drainage and kept in a clean condition.

9.2 Layout and Product Flow

9.2.1 Premises and plant shall be designed, constructed and maintained to control the risk of product contamination and to comply with relevant legislation.

9.2.2 Buildings and facilities shall be of sound construction and maintained in good repair.

9.2.3 Working space shall be provided to allow for satisfactory performance of all operations.

9.2.4 The design shall be such as to permit easy and effective cleaning and disinfection. The flow of cleaning and disinfection shall ensure that utensils etc. leaving the disinfection process enter a clean area fully protected against any source of recontamination.

9.2.5 The building and facilities shall be designed to prevent the entrance and harbourage of pests and the entry of environmental contaminants such as smoke, dust etc.

9.2.6 Building and facilities shall be designed to provide separation, by partition, location or other effective means, between those operations, which may result in, cross contamination or, in the case of meat, cross species contamination. Physical separation shall be achieved when handling raw and ready-to-eat foods.

9.2.7 Where, for example, vacuum packing of ready-to-eat foods is carried out, the vacuum packing machine shall be located in a designated area where there is no risk from cross contamination.

9.2.8 Buildings and facilities shall be designed to facilitate hygienic operations by means of a regulated flow in the process from the arrival of the raw material and packaging at the premises to the finished product, and shall provide for appropriate temperature conditions for the processes and the product.

9.3 Fabrication (raw material handling, preparation, processing, packing and storage areas)

9.3.1 The fabrication of the site, buildings and facilities shall be suitable and appropriate for the intended use.

9.3.2 Floors

9.3.2.1 Floors shall be designed, constructed and finished to provide a surface which is waterproof, non absorbent, cleanable, slip-resistant as appropriate, without crevices and should be easy to clean and disinfect.

9.3.2.2 Floors shall be designed to withstand cleaning materials and methods and to avoid standing water.

9.3.2.3 Where floor drainage is provided, floors shall have appropriate falls to the drains.

9.3.2.4 Floors and, where fitted, drainage shall be maintained in a good state of repair.

9.3.2.5 Floor drainage, where fitted, shall be designed to minimise the risk of product contamination, including the provision of trapped outlets.

9.3.3 Walls

9.3.3.1 Walls shall be designed, constructed and finished to provide a surface which is waterproof, non absorbent, cleanable and light coloured, where appropriate.

9.3.3.2 Angles between walls, ceilings and floors shall be sealed and coved to facilitate cleaning.

9.3.3.3 Where walls are subject to damage from moveable equipment, protection shall be fitted to corners and other exposed areas.

9.3.3.4 Walls shall be designed to withstand cleaning materials and methods.

9.3.3.5 Walls shall be maintained in a good state of repair.

9.3.4 Ceiling/Overheads

9.3.4.1 Ceilings shall be designed, constructed and finished to prevent the accumulation of dirt and minimise condensation, mould development and flaking and should facilitate cleaning.

9.3.4.2 Where a ceiling void is provided, access shall be provided to facilitate maintenance, cleaning and inspection for pest activity.

9.3.4.3 Ceiling shall be designed to withstand cleaning materials and methods.

9.3.4.4 Ceilings shall be maintained in a good state of repair.

9.3.4.5 Overhead structures and fittings shall be designed, constructed and installed in such a manner as to minimise product contamination either directly or indirectly and shall not hamper cleaning operations. They shall be designed and finished so as to prevent the accumulation of dirt and minimise condensation, mould development and flaking.

9.3.4.6 Open product shall be protected from contamination when it passes under or runs adjoining to staircases or walkways.

9.3.5 Windows and Other Openings

9.3.5.1 Windows and other openings in food rooms shall be designed and constructed to avoid accumulation of dirt and facilitate cleaning.

9.3.5.2 Where windows are designed to be opened for ventilation purposes they shall be appropriately screened to prevent the entry of pests.

9.3.5.3 Where screens are fitted to openable windows, they shall be easily removable for cleaning and kept in a good state of repair.

9.3.5.4 Internal window sills, if fitted, shall be sloped to prevent the use as shelves.

9.3.6 Doors

9.3.6.1 Doors shall have a smooth, non absorbent surface and be designed to facilitate cleaning.

9.3.6.2 External doors shall be close fitting and appropriately proofed against the entry of pests.

9.3.6.3 External doors shall be kept shut when not in use, with self-closing devices fitted, where appropriate.

9.3.7 Other Structures

9.3.7.1 Stairs, lift cages and auxiliary structures such as platforms, ladders, chutes, shall be so situated and constructed as to minimise the risk of product contamination.

9.3.7.2 Chutes shall be constructed with inspection and cleaning hatches.

9.4 Services

9.4.1 All services shall be designed, constructed and maintained to control the risk of product contamination.

9.4.2 Water Supply

9.4.2.1 An ample supply of potable water, under pressure and of suitable temperature shall be available with facilities for its storage, where necessary, and distribution and with appropriate protection against contamination.

9.4.2.2 The safety and quality of water, steam or ice that is used as a product ingredient or comes in contact with food or food handling equipment shall be regularly monitored to ensue that it presents no risk to product safety and meets specified quality and microbiological requirements.

9.4.3 Effluent and Waste Disposal

9.4.3.1 The facility shall have an efficient and effective effluent disposal system which shall at all times be maintained in good order and repair.

9.4.3.2 All effluent lines (including the sewer systems) shall be large enough to carry peak loads and shall be so constructed and located as to avoid the risk of contamination of water supplies and food production, handling and storage areas.

9.4.3.3 Appropriate systems shall be in place for the collation, collection and disposal of waste materials.

9.4.3.4 Appropriate facilities shall be provided for the storage of waste and inedible materials prior to removal from the facility. These facilities shall be designed to prevent access to waste or inedible material by pests and to avoid contamination of food, personnel, water supply, equipment, buildings or roadways on the premises.

9.4.3.5 Systems shall be in place to minimise the accumulation of waste in production areas. As a minimum, at the end of production all waste will be removed from production areas.

9.4.3.6 Waste containers should be clearly identified, suitably constructed to allow sanitisation, lidded and locked where necessary.

9.4.3.7 Waste and effluent disposal shall meet legislative requirements.

9.4.4 Compressed Air or Gas

9.4.4.1 Compressed air or gas that comes into contact with food, food equipment or packaging shall be regularly monitored and shall not present a risk to product safety, legality or quality.

9.4.5 Staff Facilities, Changing Facilities and Toilets

9.4.5.1 Staff facilities shall be designed and operated so as to minimise food safety risks.

9.4.5.2 Where specific workwear is required, changing facilities shall be provided for all personnel, including staff, visitors or contractors, prior to entry into food handling areas.

9.4.5.3 Where a high care or high risk operation is undertaken, separate and specially designed changing facilities should be provided at the point of entry.

9.4.5.4 in the case of raw meat, where different species are handled colour-coded aprons etc should be provided to reduce the risk of cross- species contamination.

9.4.5.5 Where appropriate, changing facilities shall be sited to allow personnel direct access, without recourse to any external area, to the food handling area.

9.4.5.6 Adequate toilets shall beprovided,o designed to ensure hygienic removal of waste water. These areas shall be well lit, ventilated and, where appropriate, heated.

9.4.5.7 Toilets shall not open directly into food handling areas.

9.4.5.8 Hand washing facilities with hot and cold water or water at a suitably controlled temperatures, a suitable hand cleansing preparation and suitable hygienic means of drying hands, shall be provided adjacent to the toilets.

9.4.5.9 Where paper towels are used waste receptacles shall be provided near to each washing facility.

9.4.5.10 Notices shall be displayed in toilets directing personnel to wash their hands after using the toilet.

9.4.6 Hand Washing Facilities in Processing Areas

9.4.6.1 Appropriately located facilities for hand washing and drying shall be provided wherever the process demands.

9.4.6.2 Hot and cold running water or running water at a suitably controlled temperature, a suitable hand cleaning preparation and suitable hygienic means of drying hands shall be provided.

9.4.6.3 Where paper towels are used waste receptacles shall be provided near to each washing facility.

9.4.6.4 Taps and dispensers shall be of the non hand operative type.

9.4.6.5 At entry points to high care or high risk operations and any other hand wash locations within such areas, facilities for hand disinfection shall be provided.

9.4.7 Disinfection Facilities

9.4.7.1 Facilities for cleaning and disinfection, where appropriate, of the structure, working implements and equipment shall be provided.

9.4.7.2 These facilities shall be constructed of corrosion resistant materials, capable of being easily cleaned and fitted with means of supplying a constant supply of hot and cold water or running water at a suitably controlled temperature.

9.4.7.3 Where appropriate, chemicals shall be automatically dosed to ensure the correct dilution. .

9.4.7.4 Facilities shall be separated from production areas so as to minimise the risk of product contamination. Separate facilities and cleaning materials shall be provided for disinfection of equipment used for raw and ready-to-eat foods.

9.4.8 Lighting

9.4.8.1 Adequate natural and/or artificial lighting shall be provided throughout the establishment.

9.4.8.2 All light bulbs and fittings, including those on electric fly killer devices, shall be protected by shatterproof diffusers or sleeve covers or fitted with shatterproof tubes or other suitable protection where they present a risk of product contamination in the event of breakage.

9.4.9 Air Conditioning/Ventilation

9.4.9.1 Where necessary ventilation shall be provided to prevent excessive build up of heat, steam, condensation and dust and to remove contaminated air. Ventilation should be designed to dry surfaces after wet cleaning

9.4.9.2 The direction of the air flow within the establishment shall never be from a low risk to a high risk/high care area.

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

9.4.9.4 Screens, filters and ducting shall be easily removable/accessible for cleaning and maintenance.

9.4.9.5 Where appropriate, positive air pressure systems shall be in place.

9.5 Equipment and Utensils

9.5.1 Equipment (including pipes and ducts) and utensils shall be suitably designed for the intended purpose and shall be used so as to minimise food safety risks.

9.5.2 All equipment shall be properly specified before commission and shall be constructed, maintained, serviced and operated to produce safe and legal product.

9.5.3 All equipment shall be so positioned or be mobile so as to provide access for cleaning and servicing.

9.5.4 Under no circumstances shall it be considered safe to use the same complex equipment such as vacuum packing machines, slicers, mincers, etc for both raw and ready-to-eat foods.

9.5.5 Separate chopping boards and utensils shall be used for raw and ready-to-eat foods.

9.5.6 Where different species of meat are handled separate equipment shall be provided or effective sanitation in place, including the use of colour-coded bins or containers.

9.5.7 All equipment and utensils used in food handling areas and which may come into contact with food shall be made of material which does not transmit toxic substances, odour or taste, is non absorbent, is resistant to corrosion, and is capable of withstanding repeated cleaning and disinfection. Surfaces shall be free from pits and crevices and the use of nuts and bolts should be prohibited.

9.5.8 The use of different materials in such a way that contact or chemical corrosion can occur shall be avoided.

9.6 Maintenance

9.6.1 A system of planned preventative maintenance shall be in place covering all items of equipment and utensils which are critical to product safety, legality and quality.

9.6.2 The building, equipment, utensils and all other physical facilities in the establishment, including drains, shall be maintained in good repair and in an orderly condition.

9.6.3 The safety and legality of product or product in production shall not be jeopardised during maintenance operations.

9.6.4 Tools for maintenance or equipment adjustment which are stored in production areas shall either be kept on a shadow board or a locked toolkit when not in use. Care shall be taken to ensure tools are always replaced after use and periodic checks are undertaken to ensure all tools are correctly stored and maintained clean.

9.6.5 When a machine or line is out of use for maintenance work, a sign or signs shall be clearly displayed to inform personnel.

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

9.7 Housekeeping, Cleaning and Hygiene

9.7.1 Appropriate standards of housekeeping, cleaning and disinfection shall be maintained at all times to ensure that the equipment and environment are maintained in a hygienic condition.

9.7.2 The company shall ensure that cleaning and disinfection procedures are in place that will ensure effective removal of *E. coli O157* and other pathogens from all surfaces and equipment involved in food preparation.

9.7.3 In order to ensure the adequate disinfection of surfaces, the company shall utilise disinfection products that meet as a minimum the specifications of one of the following standards

BS EN 1276:1997
BS EN 13697:2001

Where a sanitiser is utilised to achieve disinfection a two stage approach shall be utilised, the sanitiser used in both stages of the cleaning and disinfection process.

9.7.4 Where commercial grade dishwashers are utilised for small equipment the water tank shall maintain a water temperature of at least 80ºC and provide a contact time of at least 15 seconds.

9.7.5 Cleaning practices shall be undertaken so as to minimise the risk of product contamination using dedicated cleaning tools. Separate cleaning materials for use in high care/risk areas shall be provided, and materials for use in such areas shall be stored in designated areas accessible by staff in a way that ensures that their clothing and hands are not contaminated when storing or removing materials.

9.7.6 A permanent cleaning schedule shall be drawn up for each establishment, service, plant and equipment to ensure that all areas are appropriately cleaned and that critical areas, equipment and materials are designated for special attention and/or sanitation. The schedule shall identify the responsibilities, the minimum frequency the area or equipment to be cleaned,the method to be used, the chemicals to be utilised, concentrations, health and safety requirements and protective clothing to be worn.

9.7.7 Cleaning standards shall be monitored and verified and records maintained.

9.7.8 The effectiveness of the cleaning and sanitation procedures shall be verified and recorded.

9.7.9 Cleaning chemicals shall be fit for purpose, food grade, clearly labelled and used in accordance with the manufacturer's instructions.

9.7.10 Bulk cleaning chemicals, cleaning materials and other potentially hazardous substances shall not be stored in a food room, preferably in a secure storage area. Chemicals in use within a food room shall be stored so as not to present a risk of product contamination.

9.7.11 Appropriate precautions shall be taken to prevent product from being contaminated during the cleaning or disinfection operations. Any residues of these agents on a food contact surface shall be removed by thorough rinsing, before the area or equipment is again used for handling food, unless the agent is specifically verified acceptable for food contact.

9.7.12 Appropriate cleaning equipment shall be provided, maintained in a clean condition and a good state of repair. Where appropriate, equipment shall be colour coded according to the area or task. Wooden equipment shall not be utilised.

9.8 Pest Control

9.8.1 The Company shall have in place a system for controlling and eliminating the risk of pest infestation on the site.

9.8.2 There shall be an effective and continuous programme for the prevention, control and eradication of pests which shall be undertaken by suitably trained and competent personnel.

9.8.3 Establishments shall be regularly inspected for evidence of infestation and to identify any proofing works necessary to prevent the entry of pests.

9.8.4 Should pests gain entrance to the establishment, eradication measures shall be instigated. Control measures involving treatment with chemical, physical or biological agents, shall only be undertaken by or under the direct supervision of personnel who have a thorough understanding of the potential hazards which may arise. Safety data sheets shall be available on site for all pesticides utilised.

9.8.5 Where bait boxes, traps or other control measures are placed within the establishment or surrounding area, regular checks on these and an up to date plan of all such locations shall be maintained. Such equipment shall not be placed so that it presents a risk of product contamination.

9.8.6 Where electric fly killers and pheromone traps are provided, they shall be correctly sited, regularly emptied and cleaned and tubes to the electric fly killers replaced when necessary. All such light tubes shall be of a shatterproof design or so protected as to ensure no risk of glass contamination.

9.8.7 Raw materials, packaging andproduct, during all stages of production to finished product, shall be stored so as to minimise the risk of infestation. Product shall be stored away from walls and off the floor, where appropriate, to allow for pest control inspections and treatment as necessary.

9.8.8 Incoming raw materials and packaging shall be thoroughly inspected on arrival for the absence of pest infestation and reflected in monitoring records. Second hand or reconditioned machinery shall be inspection for the absence of pest infestation prior to installation.

9.8.9 Drains, downpipes and ventilation pipes shall, where appropriate, be fitted with screens, balloons and water traps to prevent the entry of pests.

9.8.10 Where equipment is vulnerable to infestation regular inspections shall be undertaken to determine absence of infestation. Obsolete equipment shall be either removed from the premises or suitably stored and monitored to reduce the risk of infestation/harbourage.

9.8.11 Records shall be maintained of all inspections, infestations or sightings, treatments, etc. and details of any housekeeping or proofing works required. In the case of the latter, action taken by the company shall be recorded and signed off on completion.

9.8.12 Periodically and at least annually, the records and results of inspections, etc. shall be reviewed to identify any trends. Records of the review shall be maintained.

10.0 PERSONNEL: HEALTH AND HYGIENE REQUIREMENTS

10.1 Training

10.1.1 The Company shall ensure that all employees are appropriately trained, instructed and supervised in food safety principles and practices, commensurate with their work activity.

10.1.2 Those responsible for the development and maintenance of the HACCP plan shall receive adequate training in the application of the HACCP principle.

10.1.3 A documented standard of training for all employees who come into contact with food, food equipment or enter a food room shall be maintained, specifying requirements in respect of induction, subsequent and refresher training.

10.1.4 All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and subsequently at a level commensurate with their work activity and be appropriately supervised throughout the working period.

10.1.5 Records of the training received by each member of staff to be maintained up to date.

10.1.6 Periodically, and when there are significant changes to the product, process or HACCP, the training programme, methods of training and its application in the work environment shall be reviewed and any necessary modification or changes made to the programme.

10.2 Health Screening

10.2.1 The Company shall ensure that medical screening procedures are in place for all employees, visitors and contractors, who will be working in or visiting areas where product safety could be compromised.

10.2.2 Persons who come into contact with food, food equipment or enter food rooms shall, prior to employment, complete a comprehensive medical questionnaire, which shall be examined by a competent person to determine suitability for the food handling tasks. If appropriate a medical examination shall be undertaken.

10.2.3 Food handlers returning to work after sickness or returning from a trip abroad shall, where appropriate, complete a review medical questionnaire to ensure

their suitability for the food handling tasks and that they have not had contact with persons suffering from food poisoning symptoms.

10.2.4 The management shall take care to ensure that no person, while known or suspected to be suffering from, or to be a carrier of, a disease likely to be transmitted through or on food, or while afflicted with infected wounds, skin infections, sores or with diarrhoea or vomiting, is permitted to work in any food handling area in any capacity in which there is any likelihood of such a person directly or indirectly contaminating food with pathogenic micro-organisms. A documented procedure shall be in place and notified to all appropriate personnel to ensure that any person so affected shall immediately report the matter to the management.

10.2.5 Where the Company is aware of a food handler suffering from an infectious disease, the Company shall notify the Local Authority proper officer and exclude the person from work involving food until medical clearance has been provided in writing.

10.3 Injuries

10.3.1 Any person who has a cut or wound shall not continue to handle food or food contact surfaces until the injury is completely protected by a water proof covering which is firmly secured and which is conspicuous in colour. Appropriate first-aid facilities shall be provided for this purpose.

10.3.2 In cases where metal detection facilities exist the waterproof covering shall include a detectable strip. The plasters used for cuts and grazes shall be regularly tested through a metal detector.

10.4 Washing of Hands

10.4.1 Any person, while on duty in a food handling area, shall wash their hands frequently and thoroughly with a suitable hand cleaning preparation (liquid hand wash that has disinfectant properties conforming to the European standard BS EN 1499:1997) with hot and cold water or running water at a suitably controlled temperature. Hands shall always be washed before commencing work, immediately after using the toilet, after handling contaminated material and whenever else necessary. After handling any material, which might be contaminated with food poisoning bacteria (for example, after handling packed or unpacked raw meat and before handling packed or unpacked cooked meat), hands shall be washed and disinfected immediately. Notices requiring hand washing shall be displayed. There shall be appropriate training and supervision to ensure compliance with this requirement.

10.4.2 Hands shall not come into contact with taps after they have been washed.

10.4.3 The effectiveness of hygiene procedures with regard to hands should be checked and verified periodically.

10.4.4 Gloves, if used in the handling of food product, shall be maintained in a sound, clean and sanitary condition. Where appropriate, gloves shall be coloured to aid detection. The wearing of gloves does not exempt the food handler from having thoroughly washed hands. Gloves shall be changed whenever dirty, damaged or where they may present a risk of product contamination.

10.4.5 Where hygienic hand rubs are utilised to BS EN 1500, they shall not replace

effective hand washing..

10.5 Personal Cleanliness/Protective Clothing

10.5.1 Every person entering a food handling area shall maintain a high degree of personal cleanliness and shall at all times while so engaged wear suitable company issued protective clothing including, where applicable, head covering and footwear, all of which articles shall be cleansable unless designed to be disposed of and shall be maintained in a clean damage free condition, consistent with the nature of the work in which the person is engaged.

10.5.2 Where the facility includes both low risk and high risk/high care operations, clearly distinguishable protective clothing shall be provided for each operation so as to reduce the risk of cross contamination.

10.5.3 For high risk/high care operations clean protective clothing shall be located at the point of entry into the high risk/high care area(s). On leaving the high risk/high care area protective clothing shall always be removed in the designated changing area even when leaving to utilise the toilet or staff facilities.

10.5.4 Protective clothing, including headwear and footwear, shall be stored so that at no time is there the potential for contamination from outdoor clothing, shoes, etc. removed by the operative.

10.5.5 Laundering of protective clothing shall either be undertaken in-house or by an approved contractor. Suitable controls shall be exercised during the laundering process to ensure that at no time is the protective clothing exposed to a risk of contamination and, in the case of in-house facilities, that the facilities are maintained separate from food handling areas and present no risk of contamination to food products or ingredients..

10.5.6 Disposable clothing shall be disposed of after each use, including hairnets or mob hats.

10.5.7 Hairnets shall, in the case of metal detection, be detectable. The hairnet shall be regularly tested through a metal detector and records kept.

10.5.8 All hair shall be fully contained to prevent product contamination.

10.5.9 Gloves, if worn, shall be subject to appropriate control to avoid product contamination.

10.5.10 Smoking shall only be permitted in designated areas which shall be clearly labelled.

10.5.11 Protective clothing shall not be worn outside of the production areas, for example during smoking or eating, when there is a risk of product or packaging contamination.

10.5.12 Beards shall, where appropriate, be contained in a snood.

10.5.13 Suitable footwear shall, at all times, be worn within the factory area.

10.6 Jewellery, Nail Varnish, etc

10.6.1 The Company shall have a policy which clearly specifies the type of jewellery allowed to be worn for ethnic, medical or religious reasons and the controls in place to effectively minimise the risk of contamination.

10.6.2 Every person engaged in handling open food shall not wear jewellery or watches other than one piece plain sleeper earrings and/or a plain band ring. Such jewellery shall be kept in a good state of repair and clean. In respect of body piercing and studs an assessment of the risk of product contamination shall be undertaken and necessary controls instigated.

10.6.3 Nail varnish shall not be worn by staff handling open food.

10.6.4 Excessive make up, perfume or aftershave shall not be worn and make up shall be limited so as to reduce the risk of product contamination.

10.6.5 Fingernails shall be kept short, clean and unvarnished. Any type of false fingernails shall not be permitted.

10.7 Personal Behaviour

10.7.1 Any behaviour which could result in contamination of food, such as eating, drinking, use of tobacco, chewing, hand to mouth contact or any unhygienic practices, such as spitting, shall be prohibited in food handling areas.

10.7.2 Eating and drinking shall only be permitted in designated areas. Suitable storage facilities shall be provided, if appropriate, for personnel to store personal food and drink so that it is not introduced into production or changing areas.

10.7.3 Personal items including car keys, mobile phones or accessories, bags, etc. shall not be brought into food production areas where there is a risk of product contamination.

10.8 Visitors and Contractors

10.8.1 Precautions shall be taken to prevent visitors and contractors to food handling areas from contaminating food**.** These shall include, where necessary, the provision of protective clothing and completion of a medical questionnaire and adoption of Company rules as to personal hygiene.

10.9 Supervision

6.9.1 Responsibility for ensuring compliance by all personnel with all requirements of this section shall be specifically allocated to competent supervisory personnel.

11.0 PRODUCT CONTROL

11.1 Product Development and Control

11.1.1 A hazard analysis study shall be undertaken during product development in accordance with the principles of HACCP.

11.1.2 All products and/or processes shall have in place a comprehensive hazard analysis in accordance with the principles of HACCP.

11.1.3 The Company shall ensure that personnel involved in the hazard analysis study have appropriate product specific knowledge and expertise for the development of an effective HACCP plan. Where resources are not available within the Company, expert advice shall be obtained from other sources.

11.1.4 Where appropriate, the Company will establish a multidisciplinary team to undertake the hazard analysis study.

11.1.5 The scope of the HACCP plan shall be identified. The scope shall describe which segments of the food chain are involved and the general classes of hazards to be addressed.

11.1.6 A full description of the product shall be drawn up, including relevant safety information, for example, composition, physical/chemical structure and the inherent properties of the product (including water activity (a_w), pH, etc.), microcidal/static treatments (heat treatment, freezing, brining, smoking, etc.), packaging, durability and storage conditions and, where appropriate, method of distribution.

11.1.7 In developing the HACCP plan regard shall be given to the intended use of the product by the end user or consumer and if any special precautions should be taken in respect of the increased risk to vulnerable groups, for example elderly care in hospitals and nursing homes.

11.1.8 A flow diagram shall be constructed by the HACCP team to cover all the steps and stages of the operation.

11.1.9 Confirmation of the flow diagram shall be undertaken during all steps and stages and hours of operation to demonstrate it accurately reflects operational practice.

11.1.10 The HACCP team shall list all the hazards that may reasonably be expected to occur at each step and stage from receipt of raw materials and packaging until the point of consumption. The HACCP team shall, by conducting a hazard analysis, identify which hazards are of such a nature that their elimination or reduction to an acceptable level is essential to the production of safe and legal food.

11.1.11 The HACCP team shall, by the application of a decision tree, or such other method applicable to the type of product or production, determine which steps and/or stages are critical to food safety and legality.

11.1.12 For each identified Critical Control Point (CCP) the HACCP team shall establish a critical limit which shall be specified and validated.

11.1.13 The HACCP team shall establish scheduled measurement or observation to monitor each CCP relative to its critical limits. Such monitoring, where possible, shall be able to detect loss of control in a timely manner so that adjustments can be made prior to the loss of control.

11.1.14 The HACCP team shall establish corrective action specific to each CCP in order to deal with deviations when they occur and to ensure the CCP has been bought under control.

11.1.15 The HACCP team shall establish procedures for periodic, and at least annual verification of the HACCP plan including, as appropriate:

- Review of the HACCP system and its records
- Review of deviations and product dispositions
- Confirmation that CCPs are under control

11.1.16 The HACCP team shall establish documentation and record keeping appropriate to the HACCP principles and their application having regard to the nature and size of the business.

11.1.17 All records and documents associated with the monitoring of CCPs shall be signed by the person(s) doing the monitoring and by a person responsible for the review of such documents and records.

11.1.18 The HACCP team shall, where appropriate, undertake factory trials and product testing to verify the HACCP, product formulation and manufacturing process are capable of producing a safe legal product.

11.1.19 Product shelf life shall be established, taking into account raw ingredients, product formulation, packaging, storage, distribution and the end user or consumer.

11.1.20 It is vital that representative samples are stored and handled to reflect the reasonable foreseeable conditions of distribution, storage and use. Chilled products should be stored during the shelf-life trials at 8ºC and held for a period of four hours at ambient temperature prior to sampling for *Listeria monocytogenes*.

11.1.21 Shelf life trials shall be undertaken and trial results documented and retained.

11.1.22 Whenever the product constituents, formulation or processing changes, the shelf life data shall be reviewed and further shelf life trials undertaken to verify the shelf life.

11.2 Physical, Chemical, Biological and Metallic Contamination Risk

11.2.1 Appropriate facilities and procedures shall be in place to prevent, as far as reasonably practicable, the risk of physical, chemical or biological contamination of product.

11.2.2 The structure and equipment shall be maintained in a good state of repair in order to prevent the risk of physical contamination of product.

11.2.3 Maintenance work shall be undertaken with care in order to prevent the risk of physical contamination of product. At the conclusion of any maintenance work, procedures shall be in place to ensure that no product contamination risks exist.

11.2.4 Any glass or brittle perspex/plastic forming part of the structure and/or food processing equipment, where there is a potential risk of product contamination, shall be recorded on a glass/brittle perspex/plastic register which shall be maintained up to date.

11.2.5 Where a glass/brittle perspex/plastic register is maintained, inspections shall be carried out to assess the state of the glass or brittle perspex at a frequency determined by risk assessment.

11.2.6 Any glass windows above or adjoining areas where open food is being handled shall be protected against breakage.

11.2.7 Where glass, brittle perspex/plastic or glass bottle packaging presents a possible risk of product contamination by breakage, a documented policy shall be in place for the action to be taken in the case of breakage.

11.2.8 A record shall be retained of all glass or brittle perspex/plastic breakages that posed a risk of product, packaging or machinery contamination.

11.2.9 The use of wooden equipment or wood within the structure, where it presents a possible risk of product contamination, should be replaced or eliminated.

11.2.10 Where wooden pallets are used by suppliers or for finished product each pallet shall be suitably lined to present a barrier between the wood and the product.

11.2.11 Wooden pallets shall be inspected before use, whilst in storage areas and post use for any damage which may result in physical contamination. Any damaged pallets shall be removed from storage and production areas where they present a risk of product contamination.

11.2.12 Wooden pallets shall not be permitted in food production areas.

11.2.13 Bulk storage of cleaning chemicals shall not be permitted in rooms or areas where food and/or packaging materials are stored or processed.

11.2.14 Cleaning chemicals for daily use shall not be stored in close proximity to food and/or packaging so as to present a risk of contamination.

11.2.15 Procedures shall be in placed to prevent contamination and cross contamination of raw materials, packaging, and product in production and finished product.

11.2.16 In high risk/high care areas where there is a risk of microbiological contamination or bacterial proliferation, the processing and handling of food in these areas shall be appropriate to minimise the risk of product contamination or bacterial proliferation.

11.2.17 The Company shall ensure appropriate controls are put in place to eliminate or minimise the risk of metal or other physical contamination (for example stones from the field, stalks, and insects).

11.2.18 The Company shall identify the need for metal or other detection equipment as part of their HACCP assessment. The HACCP assessment shall identify those steps or stages which are critical and establish critical limits for detection having regard to the nature of the food and the process.

11.2.19 The Company shall document the procedures for corrective action, machinery adjustment, calibration, periodic testing and record keeping. These shall include the quarantine and re-testing of all product passed through the detector since the last acceptable test and the control and destruction of the rejected product.

11.2.20 Where product is automatically rejected into a bin or other such container the container shall be kept locked during production periods and only opened by authorised personnel to remove or assess rejected product.

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

11.2.22 The rejected product shall be removed to a secure container which shall be clearly labelled as non-conforming product to prevent any misuse of the product.

11.2.23 Where in-line detectors incorporate the deflection of the rejected product to a separate container, the container shall either be colour coded or clearly labelled as non-conforming product to prevent any misuse of the product.

11.3 Raw Materials

11.3.1 All deliveries shall be inspected by a competent person to ensure that they meet the product specification. Any non conforming product should be prevented from unintended use.

11.3.2 In respect of temperature sensitive deliveries the temperature shall be taken using a suitable calibrated thermometer, sanitised as appropriate, and recorded.

11.3.3 Records of delivery checks shall be maintained. Receipt documentation and product labelling shall facilitate traceability and stock rotation.

11.3.4 Items shall be stored under such conditions that shall preclude the contamination with and/or proliferation of micro-organisms and protected against deterioration of the product or damage to the container/packaging. Facilities should provide protection to ingredients packaging and final products from dusts, condensation, drains or waste.

11.3.5 During storage, periodic inspection shall take place to ensure fitness for human consumption, stock rotation is maintained and that product is utilised in sequence.

11.3.6 In respect of temperature sensitive items a system shall be in place to demonstrate effective temperature control during the delivery procedure and storage.

11.4 Product Handling

11.4.1 Where raw materials are handled which are known allergens, care shall be exercised at all stages and steps of the process to eliminate the risk of product cross contamination.

11.4.2 Where a finished product is labelled to indicate freedom from an allergen or the product holds a special designation, for example organic, Halal, product certified or vegetarian, documented procedures shall be implemented to ensure the prevention of product contamination .

11.4.3 The Company shall undertake a risk assessment of raw materials and the production process to identify the likelihood of contamination by known allergens or the likelihood of loss of identify–preserved status, for example organic, and shall put in place control measures to ensure product safety, legality and quality are maintained.

11.4.4 Where cooked meat products (or ready to eat products) are stored, handled or processed, separation from raw meat shall be maintained at all times.

11.5 Stock Management

11.5.1 Procedures shall be in place to ensure materials and products are used in the correct order and within the allocated shelf life, ensuring that the shelf-life extends beyond the shelf-life of the finished product, where appropriate.

11.5.2 Product labelling shall facilitate correct stock rotation. Product decanted from its original packaging will be clearly labelled to facilitate correct stock rotation.

11.5.3 Decanted product shelf life shall be determined according to the suppliers coding and taking into account the method and location of subsequent storage.

11.5.4 Storage bins/containers shall only be utilised for the storage of product with the same batch code/date code to facilitate correct stock rotation and traceability.

11.6 Non-conforming Product

11.6.1 The Company shall ensure that all out of specification raw materials, product in production, finished product and packaging is identified, quarantined and clearly labelled.

11.6.2 In the case of finished product subject to approval for release, a clear system of labelling or stock location shall be utilised to indicate product awaiting release and released product.

11.6.3 In the case of product subject to scanning or detection equipment for the detection of physical contamination a clear system of labelling or stock location shall be utilised to indicate product subject to scanning or detection since the last satisfactory test of the equipment.

11.6.4 All non-conforming product shall be handled or disposed of in accordance with Company documented procedures by authorised personnel, and is only handled by registered contractors.

11.6.5 Where non-conforming product is subject to disposal or for alternative use, for example animal feed, the Company shall ensure that appropriate steps are taken to ensure that the product cannot re-enter the food chain.

11.6.6 Where appropriate, corrective action shall be taken to avoid a reoccurrence of non conformance. A record of corrective action shall be maintained.

11.7 Product Labelling

11.7.1 Product shall be clearly labelled in accordance with current legal requirements.

11.7.2 Each container shall be embossed or otherwise permanently marked in code or in clear to indicate the producing factory and the lot. Individual/bulk packs shall be traceable to source and where applicable carry the following information:

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

11.7.3 Product which can support the growth of *Listeria monocytogenes* shall display a recommended storage temperature of 5ºC or below, although the Company may specify a temperature below 5ºC.

11.8 Packaging

11.8.1 Packaging shall be inspected on delivery to ensure that it meets the product specification. Packaging outside of the specification shall be quarantined and clearly labelled as non-conformity product.

11.8.2 All packaging shall be appropriate for the product to be packed and for the expected conditions of storage/use and shall not transmit to the product any objectionable substances.

11.8.3 Packaging shall be stored under conditions, which shall minimise the risk of contamination and deterioration. Wrapping and packaging materials for ready-to-eat foods shall be stored in a designated clean area designed to protect it from cross-contamination and accessible by staff in a way that ensures their clothing and hands are not contaminated when loading or removing materials.

11.8.4 Packaging shall be removed from any outer wrapping, boxes, etc. away from production areas so as to eliminate the risk of contamination.

11.8.5 Once decanted any containers which will be directly in contact with food shall either be stored in blue plastic bags or inverted so as to eliminate the risk of contamination. Similar controls shall be exercised in respect of lids, caps or covers.

11.8.6 Any part used packaging materials shall be suitably protected from the risk of contamination.

11.8.7 Product containers shall not be used for any purpose which may lead to contamination of the product. Where appropriate, containers shall be inspected immediately prior to use to ensure that they are in a satisfactory condition.

11.8.8 Only packaging materials required for immediate use shall be kept in the packing or filling area.

11.8.9 Where cooked meat products (or ready to eat products), as well as raw meat are supplied, product shall be suitably packaged so as to prevent the spillage of blood or cross contamination.

11.9 Product Release

11.9.1 The Company shall ensure that product is only released by authorised personnel who shall observe all release procedures.

12.0 Production

12.1 Production Control

12.1.1 The Company shall maintain and operate procedures that are capable of producing consistent safe, legal and quality products from raw ingredients assembly to finished product packing.

12.1.2 All steps or stages in the production process shall be performed without unnecessary delay and under conditions which shall prevent the possibility of contamination or deterioration of, or the development of proliferation of micro-organisms in the raw ingredients, intermediate and/or finished product.

12.1.3 Where temperature and/or time control of raw materials, intermediate and/or finished product, process and/or environment is critical to product safety, legality and quality, this shall be controlled, monitored and recorded having regard to the risk. Where electronic monitoring is utilised it shall monitor, at an appropriate, frequency, the process/product status and be linked to a suitable failure alarm system.

12.1.4 Production shall be in accordance with the Company Food Safety Management System and HACCP assessment. Ongoing process validation and verification shall be undertaken in accordance with these systems to demonstrate control of critical issues in respect of safety, legality and quality issues.

12.1.5 Appropriate supervision by technically competent personnel shall be maintained at all times.

12.1.6 Equipment and utensils utilised in a high risk/high care production area shall be clearly distinguishable from similar equipment and utensils utilised in low risk areas.

12.1.7 Separate equipment and utensil cleaning and disinfection facilities shall be provided for a high risk/high care production area and a low risk area.

12,1,8 Where raw meat of different species is processed separate preparation areas and equipment shall be maintained at all times. Where, due to the size of the operation, this cannot be achieved, separation shall be achieved by time and a deep clean and disinfection to be undertaken before a different species is processed. Surface testing shall be undertaken to validate the effectiveness of the cleaning and disinfection process and cleaning protocols shall extend to personnel and associated work wear.

12.1.9 Where meat or meat products are produced as “Kosher” or “Halal” controls shall be exercised and validated to confirm such claims

12.1.10 The processing of horse carcases, offal, cuts or any processed meat is not permitted in production or preparation areas utilised for other species of meat.

13.0 Dispatch

12.1 All vehicles used shall be suitable for the purpose, maintained in good repair and maintained in a clean and hygienic condition.

13.2 Hygiene and maintenance procedures shall be documented and records maintained.

13.3 The food product shall be transported under conditions that shall preclude the contamination with and/or proliferation of micro-organisms, and protect against physical and chemical contamination, deterioration or damage to the container/ packaging, as applicable.

13.4 Where raw and cooked meat products (or ready to eat products) are supplied, separation shall be maintained during picking and loading so as to eliminate

the risk of cross contamination.

13.5 All vehicles, containers, etc. used for transportation shall be free from infestation, odours, potential foreign bodies, oil and grease and accumulation of dirt or debris.

13.6 In respect of temperature sensitive food products a system shall be in place to demonstrate effective temperature control at all stages, including picking, loading and transportation. In respect of product which can support the growth of *Listeria monocytogenes* the temperature shall be 5ºC or below.

13.7 Refrigerated or temperature controlled transport shall be capable of maintaining product temperatures within specification.

13.8 Refrigerated or temperature controlled transport shall incorporate temperature data logging devices which can be interrogated, or provide a printout, to confirm the time/temperature conditions throughout the transportation process, or a system shall be in place to validate the temperature of the product regularly throughout the transportation process.

13.9 Where the material to be transported is susceptible to weather damage, vehicles shall be loaded and unloaded in covered or docking bays.

13.10 Procedures shall be in place in the event of a vehicle or refrigeration unit breakdown. All such incidents shall be recorded, including details of the corrective action taken in respect of the food product. In the case of temperature failure procedures shall be in place to establish the safety status of the product prior to further deliveries.

13.11 Where returns, non-conforming product and/or food complaint samples are returned on a delivery vehicle a secure storage facility shall be provided on the vehicle or all products shall be clearly labelled and segregated to eliminate the risk of product contamination or re-issue.

13.12 In respect of the use of cages, etc. for mixed product transportation, care shall be exercised to ensure the cage is stable when loaded and product is not subject to damage or contamination during transportation.

13.13 Where a vehicle is used to transport raw and processed products, procedures shall be implemented to prevent cross contamination.`

13.14 Maintenance equipment (e.g. oil, petrol, etc.) for transportation shall not be stored in an area where food is handled.

13.15 Hand washing or hand sanitising facilities shall be provided on vehicles to ensure hand cleanliness after handling raw meat and before handling cooked meat (or ready to eat products).

14.0

Definitions

Accreditation	Procedure by which an authoritative body gives formal recognition of the competence of a certification body to provide certification services, against an international standard
Accreditation body	Agency having jurisdiction to formally recognise the competence of a certification body to provide certification services
Allergen	Food causing an adverse reaction that is mediated by an immunological response
Analysis	Laboratory and/or “in house” measurement or assessment
Audit	A systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives
Certification	Procedure by which accredited certification bodies, based on an audit, provide written or equivalent assurance that food safety management systems and their implementation conform to requirements
Certification body	Provider of certification services, accredited to do so by an accreditation body
Certification standard	A normative document, established by consensus and approved by a recognised body, that provides, for common and repeated use, rules, guidelines or characteristics for activities or their results, aimed at the achievement of the optimum degree of order in a given context
Certification system	A system that has its own rules of procedure and management for carrying our certification
Cleaning	The removal of soil, food residues, dirt, grease or other objectionable matter
Company	The person, firm, Company or other entity whom has a contract with the Public Sector to supply food products
Contamination	The occurrence of any objectionable matter in the product
Control measure	Any action and activity that can be used to prevent or eliminate a food safety hazard or reduce it to an acceptable level

Critical Control Point	A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level
Disinfection	The reduction, without adversely affecting the food, by means of hygienically satisfactory chemical agents and/or physical methods, of the number of micro-organisms to a level that will not lead to harmful contamination of food
Establishment	Any building(s) or area(s) in which food is handled and the surroundings under the control of the same management
	A detrimental reaction, often delayed, to a food, beverage or food additive or compound in food, that produces symptoms in one or more body organs and systoms, but is not a true food allergy.
Food Related Products	Includes any product or item likely to come into contact with the food in the manufacture, distribution and supply chain
Food sensitivity	An adverse reaction in humans either caused by allergens or as a result of food intolerance. The following foodstuffs and products derived from them are considered to be allergens or causing food intolerance: • Peanuts • Tree nuts (almonds, brazils, chestnuts, hazelnuts, macadamia nuts, pecans, pine nuts, pistachios, walnuts) • Eggs • Fish • Cow's milk (including lactose) • Crustacea, molluscs, shellfish • Sesame seeds • Soya • Sulphite • Cereals containing gluten (wheat, rye, barley, oats, spelt or their hybridised strains) • Celery • Mustard • Lupin • Molluscs
Hazards	A biological, chemical or physical agent in, or in contact with food, with the potential to cause an adverse health effect
Hazard Analysis and Critical Control Point System	A system which identifies, evaluates and controls hazards, which are significant for food safety
High Risk Area	An area where there is a high risk of contamination or where the risk of growth from any contamination is high, thereby posing a risk to health. The area must be physically segregated, designed to a high standard of hygiene, where practices relating to personnel, ingredients, equipment, packaging and environment aim to prevent product contamination by micro-organisms

High Risk Operation	An operation where there is a significant risk of contamination of ready to eat product by micro-organisms, thereby posing a risk to health. The processing or handling of food in these areas must be appropriate to prevent product contamination by micro-organisms
Hygiene	Means all measures to ensure the safety and wholesomeness of food during preparation, processing, manufacture, packaging, storage, transportation, distribution, handling and supply
Inspection	Examination of systems for control of food safety, in order to verify that they conform to requirements
Low Risk Operations	An operation where the processing or handling of foods presents least or minimum risk of product contamination or growth of micro-organisms, or where the subsequent processing or preparation of the product by the consumer will ensure product safety
Lot	Means a definitive quantity of commodity produced under essentially the same conditions
Non Conformity	Deviation of product or process from specified requirements, or the absence of, or failure to implement and maintain, one or more required management systems elements, or a situation which would, on the basis of available objective evidence, raise significant doubt as to the conformity of what the supplier is supplying
Packaging Material	Any containers such as cans, bottles, cartons, boxes, cases and sacks, or wrapping and covering material such as foil, film, metal, paper, wax paper and cloth
Pest	Any animal or insect capable of directly or indirectly contaminating food
Primary Production	Food product that is similar in nature to its natural state, but may have been: ➢ Packed ➢ Washed ➢ Trimmed (not cut into pieces) ➢ Undergone any process not defined under the definition of "processed food"

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

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

Requirements Criteria set down in a conforming standard related to food safety