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DETAILED CHANGES TO THE REQUIREMENTS

The following tables highlight the changes to the requirements between Issue 7 and Issue 8 and provide a brief commentary on the reasons for each change, where applicable.

Changes from Issue 7 have been highlighted in red text in the column headed 'Issue 8'. Please note, however, that it is the responsibility of the site to study all the requirements of the Standard to ensure that these are understood and that suitable processes are in place to ensure compliance.

1 SENIOR MANAGEMENT COMMITMENT

1.1 SENIORMANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		**STATEMENT OF INTENT**		
The site's senior management shall demonstrate they are fully committed to the implementation of the requirements of the Global Standard for Food Safety and to processes which facilitate continual improvement of food safety and quality management.		The site's senior management shall demonstrate they are fully committed to the implementation of the requirements of the Global Standard for Food Safety and to processes which facilitate continual improvement of food safety and quality management.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
1.1.1	The site shall have a documented policy which states the site's intention to meet its obligation to produce safe and legal products to the specified quality and its responsibility to its customers. This shall be: ● signed by the person with overall responsibility for the site ● communicated to all staff.	1.1.1	The site shall have a documented policy which states the site's intention to meet its obligation to produce safe, legal and authentic products to the specified quality, and its responsibility to its customers. This shall be: ● signed by the person with overall responsibility for the site ● communicated to all staff.	'Authentic' added to reflect the need for the prevention of food fraud to be included within the company's activities.

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		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		1.1.2	The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. This shall include: ● defined activities involving all sections of the site that have an impact on product safety ● an action plan indicating how the activities will be undertaken and measured, and the intended timescales ● a review of the effectiveness of completed activities.	The product safety culture which prevails at the site is fundamental in the ongoing management of product safety. Therefore, this new clause requires the site to introduce and implement a plan for the development and continuing improvement of a product safety culture.
1.1.2	The site's senior management shall ensure that clear objectives are defined to maintain and improve the safety, legality and quality of products manufactured, in accordance with the food safety and quality policy and this Standard. These objectives shall be: ● documented and include targets or clear measures of success ● clearly communicated to relevant staff ● monitored and results reported at least quarterly to site senior management.	1.1.3	The site's senior management shall ensure that clear objectives are defined to maintain and improve the safety, legality and quality of products manufactured, in accordance with the food safety and quality policy and this Standard. These objectives shall be: ● documented and include targets or clear measures of success ● clearly communicated to relevant staff ● monitored and results reported at least quarterly to site senior management.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
1.1.3	Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals, annually as a minimum, to review the site performance against the Standard and objectives set in clause 1.1.2. The review process shall include the evaluation of: ● previous management review action plans and timeframes ● results of internal, second-party and/or third-party audits ● customer complaints and results of any customer feedback ● incidents, corrective actions, out-of-specification results and non-conforming materials ● review of the management of the systems for HACCP, food defence and authenticity ● resource requirements. Records of the meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed timescales.	1.1.4	Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals, annually at a minimum, to review the site performance against the Standard and objectives set in clause 1.1.3. The review process shall include the evaluation of: ● previous management review action plans and timeframes ● the results of internal, second-party and/or third-party audits ● any objectives that have not been met, to understand the underlying reasons. This information shall be used when setting future objectives and to facilitate continual improvement ● any customer complaints and the results of any customer feedback ● any incidents (including both recalls and withdrawals), corrective actions, out-of- specification results and non-conforming materials ● the effectiveness of the systems for HACCP, food defence and authenticity ● resource requirements. Records of the meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed timescales.	Two new bullet points have been added. The first is to highlight that where objectives are not met, understanding the reasons for failure can be a useful lesson for the site and for the setting of future objectives. The second is to clarify that HACCP, food defence and food fraud (product authenticity) should be included in the scope of these meetings

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
1.1.4	The site shall have a demonstrable meeting programme which enables food safety, legality and quality issues to be brought to the attention of senior management at least monthly and allows for the resolution of issues requiring immediate action.	1.1.5	The site shall have a demonstrable meeting programme which enables food safety, legality, integrity and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly. Employees shall be aware of the need to report any evidence of unsafe or out-of-specification product or raw materials, to a designated manager to enable the resolution of issues requiring immediate action.	Text added to provide clarity relating to the mechanisms for reporting and dealing with those issues relating to product safety which require immediate action.
		1.1.6	The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, integrity, quality and legality. The mechanism (e.g. the relevant telephone number) for reporting concerns must be clearly communicated to staff. The company's senior management shall have a process for assessing any concerns raised. Records of the assessment and, where appropriate, actions taken, shall be documented.	This new clause establishes the need for a systemto report food safety and integrity concerns to senior management.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
1.1.5	The company's senior management shall provide the human and financial resources required to produce food safely and in compliance with the requirements of this Standard.	1.1.7	The company's senior management shall provide the human and financial resources required to produce food safely and in compliance with the requirements of this Standard.	Colour-coding on the clause has been amended to recognise that the auditor may audit activities during the facility audit which lead to discussions regarding resources. For example, if major maintenance hasn't been completed, this may be because of poor maintenance processes (e.g. work schedules) or it may be because of a lack of resource to complete the maintenance.
1.1.6	The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews: ● scientific and technical developments ● industry codes of practice ● new risks to authenticity of raw materials ● all relevant legislation applicable in the country of raw material supply, production and, where known, the country where the product will be sold.	1.1.8	The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews: ● scientific and technical developments ● industry codes of practice ● new risks to authenticity of raw materials ● all relevant legislation in the country where the product will be sold (where known).	

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1.1.7	The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRC website.	1.1.9	The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRC Global Standards website.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
1.1.8	Where the site is certificated to the Standard it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate.	1.1.10	Where the site is certificated to the Standard, it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate.	
1.1.9	The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for Global Standard for Food Safety certification. Relevant departmental managers or their deputies shall be available as required during the audit.	1.1.11	The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard. Relevant departmental managers or their deputies shall be available as required during the audit.	
1.1.10	The site's senior management shall ensure that the root causes of non-conformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence.	1.1.12	The site's senior management shall ensure that the root causes of any non-conformities against the Standard identified at the previous audit have been effectively addressed to prevent recurrence.	
		1.1.13	The BRC Global Standards logo and references to certification status shall only be used in accordance with the conditions of use detailed in the audit protocol section (Part III, section 5.6) of the Standard.	The BRC Global Standards certification logo and references to certification status must only be used in accordance with protocol rules; for example, they may not be added to consumer-facing packaging.

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1.2 ORGANISATIONAL STRUCTURE, RESPONSIBILITIES AND MANAGEMENT AUTHORITY

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality.		The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
1.2.1	The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure food safety, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	1.2.1	The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure food safety, integrity, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	
1.2.2	The site's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instructions.	1.2.2	The site's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instructions.	

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2 THE FOOD SAFETY PLAN – HACCP

ISSUE 7	ISSUE 8	
STATEMENT OF INTENT	STATEMENT OF INTENT	COMMENTS
The company shall have a fully implemented and effective food safety plan based on Codex Alimentarius HACCP principles.	The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP principles.	Some countries (e.g. the US) have introduced regulatory requirements that incorporate all of the HACCP processes outlined by the Codex Alimentarius but use different terminology. The specific terminology within the Standard, such as HACCP, prerequisites or critical control points, are intended to utilise the most commonly used global terminology to describe expectations. Sites are not required to use the specific terminology of the Standard, but are expected to fully meet the requirements.

2.1 THE HACCP FOOD SAFETY TEAM (EQUIVALENT TO CODEX ALIMENTARIUS STEP 1)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.1.1	The HACCP plan shall be developed and managed by a multi-disciplinary food safety team that includes those responsible for quality/technical, production operations, engineering and other relevant functions. The team leader shall have an in-depth knowledge of HACCP and be able to demonstrate competence and experience. The team members shall have specific knowledge of HACCP and relevant knowledge of product, process and associated hazards. In the event of the site not having appropriate in-house knowledge, external expertise may be used, but day-to-day management of the food safety system shall remain the responsibility of the company.	2.1.1	The HACCP or food safety plan shall be developed and managed by a multi-disciplinary food safety team that includes those responsible for quality assurance, technical management, production operations, engineering and other relevant functions. The team leader shall have an in-depth knowledge of Codex HACCP principles (or equivalent) and be able to demonstrate competence, experience and training. Where there is a legal requirement for specific training, this shall be in place. The team members shall have specific knowledge of HACCP and relevant knowledge of products, processes and associated hazards. In the event of the site not having the appropriate in-house knowledge, external expertise may be used, but day-to-day management of the food safety system shall remain the responsibility of the company.	Team leader's knowledge, experience and training expanded.
2.1.2	The scope of each HACCP plan, including the products and processes covered, shall be defined.	2.1.2	The scope of each HACCP or food safety plan, including the products and processes covered, shall be defined.	

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2.2 PREREQUISITE PROGRAMMES

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.2.1	The site shall establish and maintain environmental and operational programmes necessary to create an environment suitable to produce safe and legal food products (prerequisite programmes). As a guide these may include the following, although this is not an exhaustive list: ● cleaning and sanitising ● pest control ● maintenance programmes for equipment and buildings ● personal hygiene requirements ● staff training ● purchasing ● transportation arrangements ● processesto prevent cross-contamination ● allergen controls. The control measures and monitoring procedures for the prerequisite programmes must be clearly documented and shall be included within the development and reviews of the HACCP.	2.2.1	The site shall establish and maintain environmental and operational programmes necessary to create an environment suitable to produce safe and legal food products (prerequisite programmes). As a guide these may include the following, although this is not an exhaustive list: ● cleaning and sanitising ● pest management ● maintenance programmes for equipment and buildings ● personal hygiene requirements ● staff training ● purchasing ● transportation arrangements ● processesto prevent cross-contamination ● allergen controls. The control measures and monitoring procedures for the prerequisite programmes must be clearly documented and shall be included within the development and reviews of the HACCP or food safety plan.	

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2.3 DESCRIBE THE PRODUCT (EQUIVALENT TO CODEX ALIMENTARIUS STEP 2)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.3.1	A full description for each product or group of products shall be developed, which includes all relevant information on food safety. As a guide, this may include the following, although this is not an exhaustive list: ● composition (e.g. raw materials, ingredients, allergens, recipe) ● origin of ingredients ● physical or chemical properties that impact food safety (e.g. pH, a_w) ● treatment and processing (e.g. cooking, cooling) ● packaging system (e.g. modified atmosphere, vacuum) ● storage and distribution conditions (e.g. chilled, ambient) ● target safe shelf life under prescribed storage and usage conditions.	2.3.1	A full description for each product or group of products shall be developed, which includes all relevant information on food safety. As a guide, this may include the following, although this is not an exhaustive list: ● composition (e.g. raw materials, ingredients, allergens, recipe) ● origin of ingredients ● physical or chemical properties that impact food safety (e.g. pH, a_w) ● treatment and processing (e.g. cooking, cooling) ● packaging system (e.g. modified atmosphere, vacuum) ● storage and distribution conditions (e.g. chilled, ambient) ● maximum safe shelf life under prescribed storage and usage conditions.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.3.2	All relevant information needed to conduct the hazard analysis shall be collected, maintained, documented and updated. The company will ensure that the HACCP plan is based on comprehensive information sources, which are referenced and available on request. As a guide, this may include the following, although this is not an exhaustive list: ● the latest scientific literature ● historical and known hazards associated with specific food products ● relevant codes of practice ● recognised guidelines ● food safety legislation relevant for the production and sale of products ● customer requirements.	2.3.2	All relevant information needed to conduct the hazard analysis shall be collected, maintained, documented and updated. The company will ensure that the HACCP or food safety plan is based on comprehensive information sources, which are referenced and available on request. As a guide, this may include the following, although this is not an exhaustive list: ● the latest scientific literature ● historical and known hazards associated with specific food products ● relevant codes of practice ● recognised guidelines ● food safety legislation relevant for the production and sale of products ● customer requirements.	

2.4 IDENTIFY INTENDED USE (EQUIVALENT TO CODEX ALIMENTARIUS STEP 3)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.4.1	The intended use of the product by the customer, and any known alternative use, shall be described, defining the consumer target groups, including the suitability of the product for vulnerable groups of the population (e.g. infants, elderly, allergy sufferers).	2.4.1	The intended use of the product by the customer, and any known alternative use, shall be described, defining the consumer target groups, including the suitability of the product for vulnerable groups of the population (e.g. infants, elderly, allergy sufferers).	

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2.5 CONSTRUCT A PROCESS FLOW DIAGRAM (EQUIVALENT TO CODEX ALIMENTARIUS STEP 4)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.5.1	A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP scope, from raw material receipt through to processing, storage and distribution. As a guide, this should include the following, although this is not an exhaustive list: ● plan of premises and equipment layout ● raw materials including introduction of utilities and other contact materials (e.g. water, packaging) ● sequence and interaction of all process steps ● outsourced processes and subcontracted work ● potential for process delay ● rework and recycling ● low-risk/high-risk/ high-care area segregation ● finished products, intermediate/semi-processed products, by-products and waste.	2.5.1	A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP or food safety plan scope, from raw material receipt through to processing, storage and distribution. As a guide, this should include the following, although this is not an exhaustive list: ● plan of premises and equipment layout ● raw materials, including introduction of utilities and other contact materials (e.g. water, packaging) ● sequence and interaction of all process steps ● outsourced processes and subcontracted work ● potential for process delay ● rework and recycling ● low-risk/high-risk/ high-care area segregation ● finished products, intermediate/semi-processed products, by-products and waste.	

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2.6 VERIFY FLOW DIAGRAM (EQUIVALENT TO CODEX ALIMENTARIUS STEP 5)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.6.1	The HACCP food safety team shall verify the accuracy of the flow diagrams by on-site audit and challenge at least annually. Daily and seasonal variations shall be considered and evaluated. Records of verified flow diagrams shall be maintained.	2.6.1	The HACCP food safety team shall verify the accuracy of the flow diagrams by on-site audit and challenge at least annually. Daily and seasonal variations shall be considered and evaluated. Records of verified flow diagrams shall be maintained.	Colour-coding amended to reflect the fact that auditors will compare the flow diagram with the actual practices operating in the production area.

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2.7 LIST ALL POTENTIAL HAZARDS ASSOCIATED WITH EACH PROCESS STEP, CONDUCT A HAZARD ANALYSIS AND CONSIDER ANY MEASURES TO CONTROL IDENTIFIED HAZARDS (EQUIVALENT TO CODEX ALIMENTARIUS STEP 6, PRINCIPLE 1)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.7.1	The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and allergen risks (refer to clause 5.3). It shall also take account of the preceding and following steps in the process chain.	2.7.1	The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and consideration of the following types of hazard: ● microbiological ● physical contamination ● chemical and radiological contamination ● fraud (e.g. substitution or deliberate/intentional adulteration) ● malicious contamination of products ● allergen risks (see clause 5.3). It shall also take account of the preceding and following steps in the process chain.	Typical types of hazard have been added for clarity.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.7.2	The HACCP food safety team shall conduct a hazard analysis to identify hazards which need to be prevented, eliminated or reduced to acceptable levels. Consideration shall be given to the following: ● likely occurrence of hazard ● severity of the effects on consumer safety ● vulnerability of those exposed ● survival and multiplication of micro-organisms of specific concern to the product ● presence or production of toxins, chemicals or foreign bodies ● contamination of raw materials, intermediate/ semi-processed product, or finished product. Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.	2.7.2	The HACCP food safety team shall conduct a hazard analysis to identify hazards which need to be prevented, eliminated or reduced to acceptable levels. Consideration shall be given to the following: ● likely occurrence of hazard ● severity of the effects on consumer safety ● vulnerability of those exposed ● survival and multiplication of micro-organisms of specific concern to the product ● presence or production of toxins, chemicals or foreign bodies ● contamination of raw materials, intermediate/ semi-processed product, or finished product. Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented	
2.7.3	The HACCP food safety team shall consider the control measures necessary to prevent or eliminate a food safety hazard or reduce it to an acceptable level. Where the control is achieved through existing prerequisite programmes, this shall be stated and the adequacy of the programme to control the specific hazard validated. Consideration may be given to using more than one control measure.	2.7.3	The HACCP food safety team shall consider the control measures necessary to prevent or eliminate a food safety hazard or reduce it to an acceptable level. Where the control is achieved through existing prerequisite programmes, this shall be stated and the adequacy of the programme to control the specific hazard validated. Consideration may be given to using more than one control measure.	

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2.8 DETERMINE THE CRITICAL CONTROL POINTS (CCPS) (EQUIVALENT TO CODEX ALIMENTARIUS STEP 7, PRINCIPLE 2)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.8.1	For each hazard that requires control, control points shall be reviewed to identify those that are critical. This requires a logical approach and may be facilitated by use of a decision tree. Critical control points (CCPs) shall be those control points which are required in order to prevent or eliminate a food safety hazard or reduce it to an acceptable level. If a hazard is identified at a step where control is necessary for safety but the control does not exist, the product or process shall be modified at that step, or at an earlier step, to provide a control measure.	2.8.1	For each hazard that requires control, control points shall be reviewed to identify those that are critical. This requires a logical approach and may be facilitated by use of a decision tree. Critical control points (CCPs) shall be those control points which are required in order to prevent or eliminate a food safety hazard or reduce it to an acceptable level. If a hazard is identified at a step where control is necessary for safety but the control does not exist, the product or process shall be modified at that step, or at an earlier step, to provide a control measure.	

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2.9 ESTABLISH CRITICAL LIMITS FOR EACH CCP (EQUIVALENT TO CODEX ALIMENTARIUS STEP 8, PRINCIPLE 3)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.9.1	For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control. Critical limits shall be: ● measurable wherever possible (e.g. time, temperature, pH) ● supported by clear guidance or examples where measures are subjective (e.g. photographs).	2.9.1	For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control. Critical limits shall be: ● measurable wherever possible (e.g. time, temperature, pH) ● supported by clear guidance or examples where measures are subjective (e.g. photographs).	
2.9.2	The HACCP food safety team shall validate each CCP. Documented evidence shall show that the control measures selected and critical limits identified are capable of consistently controlling the hazard to the specified acceptable level.	2.9.2	The HACCP food safety team shall validate each CCP. Documented evidence shall show that the control measures selected and critical limits identified are capable of consistently controlling the hazard to the specified acceptable level.	

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2.10 ESTABLISH A MONITORING SYSTEM FOR EACH CCP (EQUIVALENT TO CODEX ALIMENTARIUS STEP 9, PRINCIPLE 4)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.10.1	A monitoring procedure shall be established for each CCP to ensure compliance with critical limits. The monitoring system shall be able to detect loss of control of CCPs and wherever possible provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list: ● on-line measurement ● off-line measurement ● continuous measurement (e.g. thermographs, pH meters etc.). Where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product.	2.10.1	A monitoring procedure shall be established for each CCP to ensure compliance with critical limits. The monitoring system shall be able to detect loss of control of CCPs and, wherever possible, provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list: ● online measurement ● offline measurement ● continuous measurement (e.g. thermographs, pH meters etc.). Where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product.	
2.10.2	Records associated with the monitoring of each CCP shall include the date, time and result of measurement and shall be signed by the person responsible for the monitoring and verified, when appropriate, by an authorised person. Where records are in electronic form there shall be evidence that records have been checked and verified.	2.10.2	Records associated with the monitoring of each CCP shall include the date, time and result of measurement and shall be signed by the person responsible for the monitoring and verified, when appropriate, by an authorised person. Where records are in electronic form, there shall be evidence that records have been checked and verified.	

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2.11 ESTABLISH A CORRECTIVE ACTION PLAN (EQUIVALENT TO CODEX ALIMENTARIUS STEP 10, PRINCIPLE 5)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.11.1	The HACCP food safety team shall specify and document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate a trend towards loss of control. This shall include the action to be taken by nominated personnel with regard to any products that have been manufactured during the period when the process was out of control.	2.11.1	The HACCP food safety team shall specify and document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate a trend towards loss of control. This shall include the action to be taken by nominated personnel with regard to any products that have been manufactured during the period when the process was out of control.	

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2.12 ESTABLISH VERIFICATION PROCEDURES (EQUIVALENT TO CODEX ALIMENTARIUS STEP 11, PRINCIPLE 6)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.12.1	Procedures of verification shall be established to confirm that the HACCP plan, including controls managed by prerequisite programmes, continues to be effective. Examples of verification activities include: ● internal audits ● review of records where acceptable limits have been exceeded ● review of complaints by enforcement authorities or customers ● review of incidents of product withdrawal or recall. Results of verification shall be recorded and communicated to the HACCP food safety team.	2.12.1	Procedures of verification shall be established to confirm that the HACCP or food safety plan, including controls managed by prerequisite programmes, continues to be effective. Examples of verification activities include: ● internal audits ● review of records where acceptable limits have been exceeded ● review of complaints by enforcement authorities or customers ● review of incidents of product withdrawal or recall. Results of verification shall be recorded and communicated to the HACCP food safety team.	

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2.13 HACCP DOCUMENTATION AND RECORD-KEEPING (EQUIVALENT TO CODEX ALIMENTARIUS STEP 12, PRINCIPLE 7)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.13.1	Documentation and record keeping shall be sufficient to enable the site to verify that the HACCP controls, including controls managed by prerequisite programmes, are in place and maintained.	2.13.1	Documentation and record-keeping shall be sufficient to enable the site to verify that the HACCP and food safety controls, including controls managed by prerequisite programmes, are in place and maintained.	

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2.14 REVIEW THE HACCP PLAN

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
2.14.1	The HACCP food safety team shall review the HACCP plan and prerequisite programmes at least annually and prior to any changes which may affect product safety. As a guide, these may include the following, although this is not an exhaustive list: ● change in raw materials or supplier of raw materials ● change in ingredients/ recipe ● change in processing conditions, processflow or equipment ● change in packaging, storage or distribution conditions ● change in consumer use ● emergence of a new risk (e.g. known adulteration of an ingredient) ● following a recall ● new developments in scientific information associated with ingredients, process or product. Appropriate changes resulting from the review shall be incorporated into the HACCP plan and/or prerequisite programmes, fully documented and validation recorded.	2.14.1	The HACCP food safety team shall review the HACCP or food safety plan and prerequisite programmes at least annually and prior to any changes which may affect food safety. As a guide, these may include the following, although this is not an exhaustive list: ● change in raw materials or supplier of raw materials ● change in ingredients/ recipe ● change in processing conditions, processflow or equipment ● change in packaging, storage or distribution conditions ● change in consumer use ● emergence of a new risk (e.g. known adulteration of an ingredient or other relevant, published information, such as the recall of a similar product) ● review following a recall ● new developments in scientific information associated with ingredients, process or product. Appropriate changes resulting from the review shall be incorporated into the HACCP or food safety plan and/or prerequisite programmes, fully documented and the validation recorded. Where appropriate, the changes shall also be reflected in the company's product safety policy and food safety objectives.	Updated to reflect the GFSI benchmark requirement.

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3 FOOD SAFETY AND QUALITY MANAGEMENT SYSTEM

3.1 FOOD SAFETY AND QUALITY MANUAL

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The company's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe product.		The company's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe product.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.1.1	The site's documented procedures, working methods and practices shall be collated in the form of a printed or electronic quality manual.	3.1.1	The site's procedures, working methods and practices shall be collated in the form of a printed or electronic quality manual.	'Documented' removed – see 'Documented procedures' in the Introduction for a full explanation.
3.1.2	The food safety and quality manual shall be fully implemented and the manual or relevant components shall be readily available to relevant staff.	3.1.2	The food safety and quality manual shall be fully implemented and the manual or relevant components shall be readily available to relevant staff.	
3.1.3	All procedures and work instructions shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. This shall include the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (e.g. there are issues of literacy or foreign language).	3.1.3	All procedures and work instructions shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. This shall include the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (e.g. there are issues of literacy or foreign language).	

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3.2 DOCUMENTATION CONTROL (NOW DOCUMENT CONTROL)

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The company shall operate an effective document control system to ensure that only the correct versions of documents, including recording forms, are available and in use.		The company shall operate an effective document control system to ensure that only the correct versions of documents, including recording forms, are available and in use.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.2.1	The company shall have a procedure to manage documents which form part of the food safety and quality system. This shall include: ● a list of all controlled documents indicating the latest version number ● the method for the identification and authorisation of controlled documents ● a record of the reason for any changes or amendments to documents ● the system for the replacement of existing documents when these are updated.	3.2.1	The company shall have a procedure to manage documents which form part of the food safety and quality system. This shall include: ● a list of all controlled documents indicating the latest version number ● the method for the identification and authorisation of controlled documents ● a record of the reason for any changes or amendments to documents ● the system for the replacement of existing documents when these are updated. Where documents are stored in electronic form these shall also be: ● stored securely (e.g. with authorised access, control of amendments, or password protected) ● backed up to prevent loss.	Effective management of documentation must include electronic systems as well as printed documents.

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3.3 RECORD COMPLETION AND MAINTENANCE

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.		The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.3.1	Records shall be legible, maintained in good condition and retrievable. Any alterations to records shall be authorised and justification for alteration shall be recorded. Where records are in electronic form these shall be suitably backed up to prevent loss.	3.3.1	Records shall be legible, maintained in good condition and retrievable. Any alterations to records shall be authorised and justification for the alteration shall be recorded. Where records are in electronic form these shall also be: ● stored securely (e.g. with authorised access, control of amendments, or password protected) ● suitably backed up to prevent loss.	Effective management of records must include electronic systems as well as printed documents.
3.3.2	Records shall be retained for a defined period with consideration given to: ● any legal or customer requirements ● the shelf life of the product. This shall take into account, where it is specified on the label, the possibility that shelf life may be extended by the consumer (e.g. by freezing). As a minimum, records shall be retained for the shelf life of the product plus 12 months.	3.3.2	Records shall be retained for a defined period with consideration given to: ● any legal or customer requirements ● the shelf life of the product. This shall take into account, where it is specified on the label, the possibility that shelf life may be extended by the consumer (e.g. by freezing). At a minimum, records shall be retained for the shelf life of the product plus 12 months.	

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3.4 INTERNAL AUDITS

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		**STATEMENT OF INTENT**		
The company shall be able to demonstrate it verifies the effective application of the food safety plan and the implementation of the requirements of the Global Standard for Food Safety.		The company shall be able to demonstrate that it verifies the effective application of the food safety plan and the implementation of the requirements of the Global Standard for Food Safety.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
3.4.1	There shall be a scheduled programme of internal audits throughout the year with a scope which covers the implementation of the HACCP programme, prerequisite programmes and procedures implemented to achieve this Standard. The scope and frequency of the audits shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least annually.	3.4.1	There shall be a scheduled programme of internal audits. At a minimum, the programme shall include at least four different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities shall be covered at least once each year. At a minimum, the scope of the internal audit programme shall include the: ● HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification) ● prerequisite programmes (e.g. hygiene, pest control) ● food defence and food fraud prevention plans ● procedures implemented to achieve the Standard. Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HACCP or food safety plan.	Non-conformities from Issue 7 suggest that the design of an effective, robust internal audit programme is not well understood. The requirements have been substantially rephrased to add clarity on the expectations of the Standard. Additional explanation is available in the BRC Global Standard for Food Safety Issue 8 Interpretation Guideline.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.4.2	Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be independent (i.e. not audit their own work).	3.4.2	Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be independent (e.g. not audit their own work).	
3.4.3	The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and the results shall be reported to the personnel responsible for the activity audited. Corrective actions and timescales for their implementation shall be agreed and completion of the actions verified.	3.4.3	The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and include objective evidence of the findings. The results shall be reported to the personnel responsible for the activity audited. Corrective and preventive actions, and timescales for their implementation, shall be agreed and their completion verified.	Slightly amended – recording objective evidence is an important feature of audits, as this provides due diligence information which may be required at a later date.
3.4.4	In addition to the internal audit programme there shall be a programme of documented inspections to ensure that the factory environment and processing equipment is maintained in a suitable condition for food production. These inspections shall include: ● hygiene inspections to assess cleaning and housekeeping performance ● fabrication inspections to identify risks to the product from the building or equipment. The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas.	3.4.4	In addition to the internal audit programme, there shall be a separate programme of documented inspections to ensure that the factory environment and processing equipment are maintained in a suitable condition for food production. At a minimum, these inspections shall include: ● hygiene inspections to assess cleaning and housekeeping performance ● fabrication inspections to identify risks to the product from the building or equipment. The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas.	These inspections are in addition to the internal audit programme outlined in clauses 3.4.1–3.4.3. Sites may find it useful to consider the glossary definition of an inspection as outlined in the Standard.

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3.5 SUPPLIER AND RAW MATERIAL APPROVAL AND PERFORMANCE MONITORING

3.5.1 MANAGEMENT OF SUPPLIERS OF RAW MATERIALS AND PACKAGING

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
The company shall have an effective supplier approval and monitoring system to ensure that any potential risks from raw materials (including packaging) to the safety, authenticity, legality and quality of the final product are understood and managed.		The company shall have an effective supplier approval and monitoring system to ensure that any potential risks from raw materials (including primary packaging) to the safety, authenticity, legality and quality of the final product are understood and managed.		The working group reviewed the glossary definition of raw material to ensure that it was consistently applied throughout the Standard, particularly in this section.
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
3.5.1.1	The company shall undertake a documented risk assessment of each raw material or group of raw materials including packaging to identify potential risks to product safety, legality and quality. This shall take into account the potential for: ● allergen contamination ● foreign-body risks ● microbiological contamination ● chemical contamination ● substitution or fraud (see clause 5.4.2). Consideration shall also be given to the significance of a raw material to the quality of the final product. The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring. The risk assessments shall be reviewed at least annually.	3.5.1.1	The company shall undertake a documented risk assessment of each raw material or group of raw materials including primary packaging to identify potential risks to product safety, legality and quality. This shall take into account the potential for: ● allergen contamination ● foreign-body risks ● microbiological contamination ● chemical contamination ● variety or species cross-contamination ● substitution or fraud (see clause 5.4.2) ● any risks associated with raw materials which are subject to legislative control. Consideration shall also be given to the significance of a raw material to the quality of the final product. The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.	Prohibited substances added to reflect the GFSI benchmark requirement. Requirements for risk assessments have been revised to ensure that reviews are completed when required, but that the process remains practicable for sites handling a large number of raw materials.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.5.1.1 *cont.*		3.5.1.1 *cont.*	The risk assessment for a raw material shall be updated: ● when there is a change in a raw material, the processing of a raw material, or the supplier of a raw material ● if a new risk emerges ● following a product recall or withdrawal, where a specific raw material has been implicated ● at least every 3 years.	

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3.5.1.2	The company shall have a documented supplier approval and ongoing monitoring procedure to ensure that all suppliers of raw materials, including packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval and monitoring procedure shall be based on risk and include one or a combination of: ● certification (e.g. to BRC Global Standards or other GFSI-recognised scheme) ● supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor or, for suppliers assessed as low risk only, supplier questionnaires.	3.5.1.2	The company shall have a documented supplier approval procedure to ensure that all suppliers of raw materials, including primary packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval procedure shall be based on risk and include either one or a combination of: ● a valid certification to the applicable BRC Global Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased ● supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. Where the supplier audit is completed by a second or third party, the company shall be able to:	Initial supplier approval and ongoing monitoring and approval processes have been divided into separate clauses to reflect the fact that there are often different requirements for these activities. Ongoing monitoring and approval is now covered in clause 3.5.1.3. Certificates used as evidence in supplier approval processes must be valid and the accuracy of the information received from the supplier must be confirmed. For example, the BRC Directory (www.brcdirectory.com) can be used to confirm the supplier's certification status and that the product scope includes the raw materials purchased by the site.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.5.1.2 *cont.*	Where approval is based on questionnaires, these shall be reissued at least every 3 years and suppliers will be required to notify the site of any significant changes in the interim. The site shall have an up-to-date list of approved suppliers.	3.5.1.2 *cont.*	– demonstrate the competency of the auditor – confirm that the scope of the audit includes product safety, traceability, HACCP review and good manufacturing practices – obtain and review a copy of the full audit report **or** ● where a valid risk-based justification is provided and the supplier is assessed as low risk only, a completed supplier questionnaire may be used for initial approval. The questionnaire shall have a scope that includes product safety, traceability, HACCP review and good manufacturing practices, and it shall have been reviewed and verified by a demonstrably competent person.	The requirements have been amended to recognise that some supplier audits may be completed by third parties. These audits may be accepted in the absence of the site completing its own audit, providing that: ● the competency of the auditor is appropriate for the type of product and standard of audit conducted ● at a minimum, the scope of the audit addresses product safety, traceability, HACCP and good manufacturing practices ● a copy of the full audit report is available – not just a certificate. Finally, the requirements have also been amended for low-risk products to be initially approved by supplier questionnaire.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		3.5.1.3	There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented. Where approval is based on questionnaires, these shall be reissued at least every 3 years and suppliers shall be required to notify the site of any significant changes in the interim, including any change in certification status. Records of the review shall be kept.	Ongoing monitoring of suppliers was originally part of clause 3.5.1.2 but has now been included as a separate clause to ensure that sites can select appropriate methods for both initial and ongoing supplier approval.
		3.5.1.4	The site shall have an up-to-date list or database of approved suppliers. This may be on paper (hard copy) or it may be controlled on an electronic system. The list or relevant components of the database shall be readily available to the relevant staff (e.g. at goods receipt).	Originally part of clause 3.5.1.2 but now included as a separate clause. It is important that the list is used, where relevant, within the site. For example, goods receipt staff must be able to check that deliveries are from approved suppliers or new product development teams must be able to readily identify approved suppliers.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.5.1.3	Where raw materials are purchased from agents or brokers, the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material. Information to enable the approval of the manufacturer, packer or consolidator, as in clause 3.5.1.2, shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is themselves certificated to the BRC Global Standard for Agents and Brokers.	3.5.1.5	Where raw materials (including primary packaging) are purchased from companies that are not the manufacturer, packer or consolidator (e.g. purchased from an agent, broker or wholesaler), the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material. Information to enable the approval of the manufacturer, packer or consolidator, as in clauses 3.5.1.1 and 3.5.1.2, shall be obtained from the agent/ broker or directly from the supplier, unless the agent/ broker is themselves certificated to a BRC Standard (e.g. BRC Global Standard for Agents and Brokers) or a standard benchmarked by GFSI.	Amended to make it clear that this clause applies whenever a food raw material is purchased from an organisation that is not the manufacturer, processor, packer or consolidator.
		3.5.1.6	The company shall ensure that its suppliers of raw materials (including primary packaging) have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test.	Requirement moved from Issue 7, clause 3.9.3 as the activity usually forms part of the supplier approval process.

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			Where a raw material is received directly from a farm or fish farm, further verification of the farm's traceability system is not mandatory.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.5.1.4	The procedures shall define how exceptions to the supplier approval processes in clause 3.5.1.2 are handled (e.g. where raw material suppliers are prescribed by a customer) or where information for effective supplier approval is not available (e.g. bulk agricultural commodity products) and instead product testing is used to verify product quality and safety. When a site produces customer-branded product the relevant exceptions shall be identified to the customer.	3.5.1.7	The procedures shall define how exceptions to the supplier approval processes in clause 3.5.1.2 are handled (e.g. where raw material suppliers are prescribed by a customer) or where information for effective supplier approval is not available (e.g. bulk agricultural commodity products) and instead product testing is used to verify product quality and safety. When a site produces customer-branded product, the customer shall be made aware of the relevant exceptions.	

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3.5.2 RAW MATERIAL AND PACKAGING ACCEPTANCE, MONITORING AND MANAGEMENT PROCEDURES

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
Controls on the acceptance of raw materials including packaging shall ensure that these do not compromise the safety, legality or quality of products and where appropriate any claims of authenticity.		Controls on the acceptance of raw materials (including primary packaging) shall ensure that these do not compromise the safety, legality or quality of products and where appropriate any claims of authenticity.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
3.5.2.1	The company shall have a documented procedure for the acceptance of raw materials and packaging on receipt based upon the risk assessment (clause 3.5.1.1). Raw material including packaging acceptance and its release for use shall be based on one or a combination of: ● product sampling and testing ● visual inspection on receipt ● certificates of analysis – specific to the consignment ● certificates of conformance. A list of raw materials including packaging and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined, implemented and reviewed.	3.5.2.1	The company shall have a procedure for the acceptance of raw materials and primary packaging on receipt based upon the risk assessment (clause 3.5.1.1). Acceptance of raw materials (including primary packaging) and their release for use shall be based on either one or a combination of: ● product sampling and testing ● visual inspection on receipt ● certificates of analysis (specific to the consignment) ● certificates of conformance. A list of raw materials (including primary packaging) and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined, implemented and reviewed.	'Documented' removed – see 'Documented procedures' in the Introduction for a full explanation.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		3.5.2.2	Procedures shall be in place to ensure that approved changes to raw materials (including primary packaging) are communicated to goods receipt personnel and that only the correct version of the raw material is accepted. For example, when labels or printed packaging have been amended, only the correct version should be accepted and released into production.	New clause reflecting the need for change control procedures for raw materials which ensure that only the correct versions are accepted and released into production. For example, if labels or printed packaging have changed and obsolete packaging continues to be accepted, this may lead to the packing of products into incorrect packaging.
		3.5.2.3	Where the site is in receipt of live animals, there shall be an inspection by a suitably competent individual at lairage and post mortem to ensure that the animals are fit for human consumption.	New clause recognising the need for additional checks where the site is in receipt of live animals.

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3.5.3 MANAGEMENT OF SUPPLIERS OF SERVICES

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
The company shall be able to demonstrate that where services are outsourced the service is appropriate and any risks presented to food safety, legality and quality have been evaluated to ensure effective controls are in place.		The company shall be able to demonstrate that where services are outsourced, the service is appropriate and any risks presented to food safety, legality and quality have been evaluated to ensure effective controls are in place.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
3.5.3.1	There shall be a documented procedure for the approval and monitoring of suppliers of services. Such services shall include, as appropriate: ● pest control ● laundry services ● contracted cleaning ● contracted servicing and maintenance of equipment ● transport and distribution ● off-site storage of ingredients, packaging or products ● laboratory testing ● catering services ● waste management.	3.5.3.1	There shall be a procedure for the approval and monitoring of suppliers of services. Such services shall include, as appropriate: ● pest control ● laundry services ● contracted cleaning ● contracted servicing and maintenance of equipment ● transport and distribution ● off-site storage of ingredients, packaging or products ● off-site packing of products ● laboratory testing ● catering services ● waste management. This approval and monitoring process shall be risk-based and take into consideration: ● risk to the safety and quality of products ● compliance with any specific legal requirements ● potential risks to the security of the product (i.e. risks identified in the vulnerability and food defence assessments).	Additional information on which to base approval and monitoring.

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3.5.3.2	Contracts or formal agreements shall exist with the suppliers of services that clearly define service expectations and ensure potential food safety risks associated with the service have been addressed.	3.5.3.2	Contracts or formal agreements shall exist with the suppliers of services that clearly define service expectations and ensure that the potential food safety risks associated with the service have been addressed.	

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3.5.4 MANAGEMENT OF OUTSOURCED PROCESSING AND PACKING (NOW MANAGEMENT OF OUTSOURCED PROCESSING)

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		**STATEMENT OF INTENT**		
Where any process step in the manufacture or packing of a product which is included within the scope of certification is subcontracted to a third party or undertaken at another site, this shall be managed to ensure it does not compromise the safety, legality, quality or authenticity of the product.		Where any process step in the manufacture of a product is outsourced to a third party or undertaken at another site, this shall be managed to ensure it does not compromise the safety, legality, quality or authenticity of the product.		Outsourced or subcontracted processes occur when a partially processed product is sent to another site for a process step(s) before being returned to the site for completion of the production/ packing operation. It is vital that the site manages this process to ensure that product safety is maintained and that customers have visibility of these activities when they occur. Packing of products by third parties (e.g. contract packing) has been removed from this section as this should not form part of the scope of the audit (the packing site is encouraged to have its own certification).
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
3.5.4.1	The company shall be able to demonstrate that where part of the production process or final packing is outsourced and undertaken off-site this has been declared to the brand owner and, where required, approval granted.	3.5.4.1	The company shall be able to demonstrate that, where part of the production process or any part of the final packing is outsourced and undertaken off-site, this has been declared to the brand owner and, where required, approval granted.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.5.4.2	The company shall ensure that subcontractors are approved and monitored by successful completion of either: ● certification to the applicable BRC Global Standard for Food Safety or other GFSI-recognised scheme ● a documented site audit with a scope to include product safety, traceability, HACCP review and good manufacturing practices by an experienced and demonstrably competent product safety auditor.	3.5.4.2	The company shall ensure that outsourced processors are approved and monitored, to ensure that they effectively manage risks to product safety and quality and are operating effective traceability processes. The approval and monitoring procedure shall be based on risk and include either one or a combination of: ● a valid certification to the applicable BRC Global Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased **or** ● supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. Where this supplier audit is completed by a second or third party, the company shall be able to: – demonstrate the competency of the auditor – confirm that the scope of the audit includes product safety, traceability, HACCP review and good manufacturing practices	This requirement mirrors the wording used in Issue 8, clause 3.5.1.2for the approval of suppliers of raw materials.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.5.4.2 *cont.*		3.5.4.2 *cont.*	● obtain and review a copy of the full audit report. There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented. Records of the review shall be kept.	
3.5.4.3	Any outsourced processing or packing operations shall: ● be undertaken in accordance with established contracts which clearly define any processing and/or packing requirements and product specification ● maintain product traceability.	3.5.4.3	Any outsourced processing operations shall: ● be undertaken in accordance with established contracts which clearly define any processing and/or packing requirements and product specification ● maintain product traceability.	
3.5.4.4	The company shall establish inspection and test procedures for products where part of the processing or packing have been outsourced, including visual, chemical and/or microbiological testing, dependent on risk assessment.	3.5.4.4	The company shall establish inspection and test procedures for products where part of the processing has been outsourced, including visual, chemical and/or microbiological testing. The frequency and methods of inspection or testing shall depend on risk assessment.	

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3.6 SPECIFICATIONS

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
Specifications shall exist for raw materials including packaging, finished products and any product or service which could affect the integrity of the finished product.		Specifications shall exist for raw materials (including primary packaging), finished products and any product or service which could affect the integrity of the finished product.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.6.1	Specifications for raw materials and packaging shall be adequate and accurate and ensure compliance with relevant safety and legislative requirements. The specifications shall include defined limits for relevant attributes of the material which may affect the quality or safety of the final products (e.g. chemical, microbiological or physical standards).	3.6.1	Specifications for raw materials and primary packaging shall be adequate and accurate and ensure compliance with relevant safety and legislative requirements. The specifications shall include defined limits for relevant attributes of the material which may affect the quality or safety of the final products (e.g. chemical, microbiological or physical standards).	
3.6.2	Accurate, up-to-date specifications shall be available for all finished products. These shall include key data to meet customer and legal requirements and assist the user in the safe usage of the product.	3.6.2	Accurate, up-to-date specifications shall be available for all finished products. These may be in the form of a printed or electronic document, or part of an online specification system. They shall include key data to meet customer and legal requirements and assist the user in the safe usage of the product.	There has been a misconception that sites must have printed documentation to comply with the Standard. This clause has therefore been amended to make it clear that, while documents may be printed, they are equally acceptable in electronic form, and in the case of specifications, they may form part of an online specification database.

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				The important point is that, regardless of format, all the relevant information must be available to the staff who need to use it, in the appropriate factory locations.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.6.3	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that it has taken steps to ensure formal agreement is in place.	3.6.3	Where the company is manufacturing customer-branded products, it shall seek formal agreement of the finished product specifications. Where specifications are not formally agreed then the company shall be able to demonstrate that it has taken steps to ensure formal agreement is in place.	Slight amendment to clarify that formal agreement should be between the site and the brand owner of the product.
3.6.4	Specifications shall be reviewed whenever products change (e.g. ingredients, processing method) or at least every 3 years. The date of review and the approval of any changes shall be recorded.	3.6.4	Specification review shall be sufficiently frequent to ensure that data is current or at a minimum every 3 years, taking into account product changes, suppliers, regulations and other risks. Reviews and changes shall be documented.	Requirement amended to ensure that the specification review is both practicable and effective.

3.7 CORRECTIVE AND PREVENTIVE ACTIONS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The site shall be able to demonstrate that it uses the information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence.		The site shall be able to demonstrate that it uses the information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.7.1	The site shall have a documented procedure for handling and correcting failures identified in the food safety and quality system.	3.7.1	The site shall have a procedure for handling and correcting failures identified in the food safety and quality management system.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.7.2	Where a non-conformity places the safety, legality or quality of products at risk this shall be investigated and recorded including: ● clear documentation of the non-conformity ● assessment of consequences by a suitably competent and authorised person ● the action to address the immediate issue ● an appropriate timescale for correction ● the person responsible for correction ● verification that the correction has been implemented and is effective ● identification of the root cause of the non-conformity and implementation of any necessary actions to prevent recurrence.	3.7.2	Where a non-conformity places the safety, legality or quality of products at risk, this shall be investigated and recorded including: ● clear documentation of the non-conformity ● assessment of consequences by a suitably competent and authorised person ● the action to address the immediate issue ● an appropriate timescale for correction ● the person responsible for correction ● verification that the correction has been implemented and is effective.	Final bullet point in Issue 7 moved to form new clause 3.7.3 in Issue 8.
		3.7.3	The site shall have a procedure for the completion of root cause analysis. At a minimum root cause analysis shall be used to implement ongoing improvements and to prevent recurrence of non-conformities when: ● analysis of non-conformities for trends shows there has been a significant increase in a type of non-conformity ● a non-conformity places the safety, legality or quality of a product at risk.	New clause combining the bullet point previously in clause 3.7.2 in Issue 7 with the need to assess non-conforming products for trends and, where appropriate, to complete root cause analysis so that preventive action can be introduced.

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3.8 CONTROL OF NON-CONFORMING PRODUCT

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The site shall ensure that any out-of-specification product is effectively managed to prevent unauthorised release.		The site shall ensure that any out-of-specification product is effectively managed to prevent unauthorised release.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.8.1	There shall be documented procedures for managing non-conforming products. These procedures shall include: ● the requirement for staff to identify and report a potentially non-conforming product ● clear identification of a non-conforming product (e.g. direct labelling or the use of IT systems) ● secure storage to prevent accidental release (e.g. physical or computer-based isolation) ● referral to the brand owner where required ● defined responsibilities for decision making on the use or disposal of products appropriate to the issue (e.g. destruction, reworking, downgrading to an alternative label or acceptance by concession) ● records of the decision on the use or disposal of the product ● records of destruction where a product is destroyed for food safety reasons.	3.8.1	There shall be procedures for managing non-conforming products. These procedures shall include: ● the requirement for staff to identify and report a potentially non-conforming product ● clear identification of a non-conforming product (e.g. direct labelling or the use of IT systems) ● secure storage to prevent accidental release (e.g. physical or computer-based isolation) ● referral to the brand owner where required ● defined responsibilities for decision-making on the use or disposal of products appropriate to the issue (e.g. destruction, reworking, downgrading to an alternative label or acceptance by concession) ● records of the decision on the use or disposal of the product ● records of destruction where a product is destroyed for food safety reasons.	

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3.9 TRACEABILITY

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The site shall be able to trace all raw material product lots (including packaging) from its suppliers through all stages of processing and dispatch to its customers and vice versa.		The site shall be able to trace all raw material product lots (including primary packaging) from its suppliers through all stages of processing and dispatch to its customers and vice versa.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
		3.9.1	The site shall have a documented traceability procedure designed to maintain traceability throughout the site's processes. At a minimum this shall include: ● how the traceability system works ● the labelling and records required.	New clause to ensure that sites have a formal traceability procedure.
3.9.1	Identification of raw materials, including primary and any other relevant packaging, processing aids, intermediate/ semi-processed products, part-used materials, finished products and materials pending investigation shall be adequate to ensure traceability.	3.9.2	Identification of raw materials (including primary packaging), intermediate/semi-processed products, part-used materials, finished products and materials pending investigation shall be adequate to ensure traceability.	The definition of raw material has been clarified throughout the Standard (see glossary in the Standard for full definition). Therefore, it is no longer necessary to list all the individual items that need traceability within each clause as these are clearly contained in the definition.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.9.2	The site shall test the traceability system across the range of product groups to ensure traceability can be determined from raw material including primary packaging to finished product and vice versa, including quantity check/ mass balance. This shall occur at a predetermined frequency, as a minimum annually, and results shall be retained for inspection. Full traceability should be achievable within 4 hours.	3.9.3	The site shall test the traceability system across the range of product groups to ensure traceability can be determined from the supplier of raw material (including primary packaging) to the finished product and vice versa, including quantity check/ mass balance. The traceability test shall include a summary of the documents that should be referenced during the test, and clearly show the links between them. The test shall occur at a predetermined frequency, at a minimum annually, and results shall be retained for inspection. Traceability should be achievable within 4 hours.	
3.9.3	The company shall ensure that its suppliers of raw materials have an effective traceability system. Where a supplier has been approved based on a questionnaire, instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test. Where a raw material is received directly from a farm or fish farm, further verification of the farm's traceability system is not mandatory.			Moved to Issue 8, clause 3.5.1.6, to highlight that this process should form part of the supplier approval process.
3.9.4	Where rework or any reworking operation is performed, traceability shall be maintained.	3.9.4	Where rework or any reworking operation is performed, traceability shall be maintained.	

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3.10 COMPLAINT-HANDLING

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Customer complaints shall be handled effectively and information used to reduce recurring complaint levels.		Customer complaints shall be handled effectively and information used to reduce recurring complaint levels.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.10.1	All complaints shall be recorded, investigated and the results of the investigation of the issue recorded where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.	3.10.1	All complaints shall be recorded, investigated and the results of the investigation of the issue recorded where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.	
3.10.2	Complaint data shall be analysed for significant trends. Where there has been a significant increase in a complaint or a serious complaint, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.	3.10.2	Complaint data shall be analysed for significant trends. Where there has been a significant increase in a complaint or a serious complaint, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.	

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3.11 MANAGEMENT OF INCIDENTS, PRODUCT WITHDRAWAL AND PRODUCT RECALL

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
The company shall have a plan and system in place to manage incidents effectively and enable the withdrawal and recall of products should this be required.		The company shall have a plan and system in place to manage incidents effectively and enable the withdrawal and recall of products should this be required.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
3.11.1	The company shall have documented procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality. This shall include consideration of contingency plans to maintain product safety, quality and legality. Incidents may include: ● disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications ● events such as fire, flood or natural disaster ● malicious contamination or sabotage. Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products.	3.11.1	The company shall have procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality. This shall include consideration of contingency plans to maintain product safety, quality and legality. Incidents may include: ● disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications ● events such as fire, flood or natural disaster ● malicious contamination or sabotage ● failure of, or attacks against, digital cyber-security. Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products.	New bullet point added to reflect the increasing prevalence of cyber-crimes.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.11.2	The company shall have a documented product withdrawal and recall procedure. This shall include as a minimum: ● identification of key personnel constituting the recall management team, with clearly identified responsibilities ● guidelines for deciding whether a product needs to be recalled or withdrawn and the records to be maintained ● an up-to-date list of key contacts (including out-of-hours contact details) or reference to the location of such a list (e.g. recall management team, emergency services, suppliers, customers, certification body, regulatory authority) ● a communication plan including the provision of information to customers, consumers and regulatory authorities in a timely manner ● details of external agencies providing advice and support as necessary (e.g. specialist laboratories, regulatory authority and legal expertise) ● a plan to handle the logistics of product traceability, recovery or disposal of affected product, and stock reconciliation. The procedure shall be capable of being operated at any time.	3.11.2	The company shall have a documented product withdrawal and recall procedure. This shall include, at a minimum: ● identification of key personnel constituting the recall management team, with clearly identified responsibilities ● guidelines for deciding whether a product needs to be recalled or withdrawn and the records to be maintained ● an up-to-date list of key contacts (including out-of-hours contact details) or reference to the location of such a list (e.g. recall management team, emergency services, suppliers, customers, certification body, regulatory authority) ● a communication plan including the provision of information to customers, consumers and regulatory authorities in a timely manner ● details of external agencies providing advice and support as necessary (e.g. specialist laboratories, regulatory authority and legal expertise) ● a plan to handle the logistics of product traceability, recovery or disposal of affected product, and stock reconciliation ● a plan to record timings of key activities ● a plan to conduct root cause analysis and to implement ongoing improvements, to avoid recurrence. The procedure shall be capable of being operated at any time.	Timings of decisions and actions can provide due diligence information where, for example, a regulatory authority requires evidence of timely actions. This can be used as part of the evidence for compliance with clause 3.11.3 (testing the recall procedures) and to demonstrate continual improvement. Root cause analysis should be used to identify meaningful preventive action to avoid recurrence of the situation that led to the withdrawal or recall.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
3.11.3	The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.	3.11.3	The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.	
3.11.4	In the event of a product recall, the certification body issuing the current certificate for the site against this Standard shall be informed within 3 working days of the decision to issue a recall.	3.11.4	In the event of a significant food safety incident, including a product recall or regulatory food safety non-conformity (e.g. a regulatory enforcement notice), the certification body issuing the current certificate for the site against this Standard shall be informed within 3 working days.	Clause amended to make it clear that the certification body should be contacted in the event of a significant food safety incident, not just a recall.

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3.12 REMOVED

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The company shall ensure that any customer-specific policies or requirements are understood, implemented and clearly communicated to relevant staff and, where appropriate, suppliers of raw materials, packaging and services.				This section has been removed as it is particularly difficult to audit (relies on auditors knowing all the customers and their specific policies). BRC Global Standards will continue to develop methods to assist specifiers in addressing concerns that relate to the auditing of individual codes of practice.
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
3.12.1	Where a company is requested to follow specific customer requirements, codes of practice, methods of working etc., these shall be made known to relevant staff within the site and implemented.			
3.12.2	Effective processes shall be in place for communicating customer-specific requirements to the suppliers of raw materials and services as applicable.			

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4 SITE STANDARDS

4.1 EXTERNAL STANDARDS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The production site shall be of suitable size, location and construction, and be maintained to reduce the risk of contamination and facilitate the production of safe and legal finished products.		The production site shall be of suitable size, location and construction, and be maintained to reduce the risk of contamination and facilitate the production of safe and legal finished products.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.1.1	Consideration shall be given to local activities and the site environment, which may have an adverse impact on finished product integrity, and measures shall be taken to prevent contamination. Where measures have been put into place to protect the site (from potential contaminants, flooding etc.), they shall be reviewed in response to any changes.	4.1.1	Consideration shall be given to local activities and the site environment, which may have an adverse impact on finished product integrity, and measures shall be taken to prevent contamination. Where measures have been put into place to protect the site (from potential contaminants, flooding etc.), they shall be reviewed in response to any changes.	
4.1.2	The external areas shall be maintained in good order. Where buildings are surrounded by grassed or planted areas, they shall be regularly tended and well maintained. External traffic routes under site control shall be suitably surfaced and maintained in good repair to avoid contamination of the product.	4.1.2	The external areas shall be maintained in good order. Where grassed or planted areas are located near buildings, they shall be regularly tended and well maintained. External traffic routes under site control shall be suitably surfaced and maintained in good repair to mitigate the risk of contamination of the product.	
4.1.3	The building fabric shall be maintained to minimise potential for product contamination (e.g. elimination of bird roosting sites, sealing gaps around pipes to prevent pest entry, ingress of water and other contaminants).	4.1.3	The building fabric shall be maintained to minimise potential for product contamination (e.g. elimination of bird-roosting sites, sealing gaps around pipes to prevent pest entry, ingress of water and other contaminants).	

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4.2 SECURITY (NOW SITE SECURITY AND FOOD DEFENCE)

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		**STATEMENT OF INTENT**		
Security systems shall ensure that products are protected from theft or malicious contamination while under the control of the site.		Systems shall protect products, premises and brands from malicious actions while under the control of the site.		The topics of site security and food defence have developed considerably since the publication of Issue 7. Therefore, this section has been expanded to reflect current good practice.
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
4.2.1	The company shall undertake a documented assessment of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. Areas shall be assessed according to risk; sensitive or restricted areas shall be defined, clearly marked, monitored and controlled. Identified security arrangements to reduce risks shall be implemented and reviewed at least annually.	4.2.1	The company shall undertake a documented risk assessment (threat assessment) of the potential risks to products from any deliberate attempt to inflict contamination or damage. This threat assessment shall include both internal and external threats. The output from this assessment shall be a documented threat assessment plan. This plan shall be kept under review to reflect changing circumstances and market intelligence. It shall be formally reviewed at least annually and whenever: ● a new risk emerges (e.g. a new threat is publicised or identified) ● an incident occurs, where product security or food defence is implicated.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.2.2	Measures shall be in place to ensure only authorised personnel have access to production and storage areas, and access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be in place. Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.	4.2.2	Where raw materials or products are identified as being at particular risk, the threat assessment plan shall include controls to mitigate these risks. Where prevention is not sufficient or possible, systems shall be in place to identify any tampering. These controls shall be monitored, the results documented, and the controls reviewed at least annually.	New clause 4.2.2 for Issue 8. Part of Issue 7 clause 4.2.2 has been moved to Issue 8 clause 4.2.3.
4.2.3	External storage tanks, silos and any intake pipes with an external opening shall be locked.	4.2.3	Areas where a significant risk is identified shall be defined, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging). Policies and systems shall be in place to ensure that only authorised personnel have access to production and storage areas, and that access to the site by employees, contractors and visitors is controlled. A visitor recording system shall be in place. Staff shall be trained in site security procedures and food defence.	The information in Issue 7 clause 4.2.3 has been transferred to the interpretation guideline for Issue 8. This is because the new clause 4.2.3 in Issue 8 has a wider remit. The original clause in Issue 7 is an example of the action that might be taken to address a risk within the new clause.
4.2.4	Where required by legislation, the site shall be registered with, or be approved by, the appropriate authority.	4.2.4	Where required by legislation, the site shall maintain appropriate registrations with the relevant authorities.	

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4.3 LAYOUT, PRODUCT FLOW AND SEGREGATION

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with relevant legislation.		The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with relevant legislation.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.3.1	There shall be a map of the site which designates areas (zones) where product is at different levels of risk from contamination; that is: ● high-risk areas ● high-care areas ● ambient high-care areas ● low-risk areas ● enclosed product areas ● non-product areas. See Appendix 2 for guidelines on defining the production risk zones. This zoning shall be taken into account when determining the prerequisite programmes for the particular areas of the site.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.1.1.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.3.2	The site map(s) shall define: ● access points for personnel ● access points for raw materials (including packaging) ● routes of movement for personnel ● routes of movement for raw materials ● routes for the removal of waste ● routes for the movement of rework ● location of any staff facilities including changing rooms, toilets, canteens and smoking areas ● production process flow.	4.3.1	There shall be a map of the site. At a minimum, this map shall define: ● access points for personnel ● access points for raw materials (including packaging), semi-finished products and open products ● routes of movement for personnel ● routes of movement for raw materials (including packaging) ● routes for the removal of waste ● routes for the movement of rework ● location of any staff facilities, including changing rooms, toilets, canteens and smoking areas ● production process flows.	
4.3.3	Contractors and visitors, including drivers, shall be made aware of all procedures for access to premises and the requirements of the areas they are visiting, with special reference to hazards and potential product contamination. Contractors working in product processing or storage areas shall be the responsibility of a nominated person.	4.3.2	Contractors and visitors, including drivers, shall be made aware of all procedures for access to premises and the requirements of the areas they are visiting, with special reference to hazards and potential product contamination. Contractors working in product processing or storage areas shall be the responsibility of a nominated person.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.3.4	The movement of personnel, raw materials, packaging, rework and/or waste shall not compromise the safety of products. The process flow, together with the use of demonstrably effective procedures, shall be in place to minimise the risk of the contamination of raw materials, intermediate/ semi-processed products, packaging and finished products.	4.3.3	The movement of personnel, raw materials, packaging, rework and/or waste shall not compromise the safety of products. The process flow, together with the use of demonstrably effective procedures, shall be in place to minimise the risk of the contamination of raw materials, intermediate/ semi-processed products, packaging and finished products.	
4.3.5	Where high-risk areas are part of the manufacturing site, there shall be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials (including packaging), equipment, personnel, waste, airflow, air quality and utilities provision (including drains). The location of transfer points shall not compromise the segregation between high-risk areas and other areas of the factory. Practices shall be in place to minimise risk of product contamination (e.g. the disinfection of materials on entry).			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.1.2.

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.3.6	Where high-care areas are part of the manufacturing site there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials (including packaging), equipment, personnel, waste, airflow, air quality and utilities provision (including drains). Where physical barriers are not in place, the site shall have undertaken a documented risk assessment of the potential for cross-contamination, and effective, validated processes shall be in place to protect products from contamination.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.1.3.
4.3.7	Where ambient high-care areas are required a documented risk assessment shall be completed to determine the risk of cross-contamination with pathogens. The risk assessment shall take into account the potential sources of microbiological contamination and include: ● the raw materials and products ● flow of raw materials, packaging, products, equipment, personnel and waste ● airflow and air quality ● utilities (including drains). Effective processes shall be in place to protect the final product from this contamination. These processes may include segregation, management of process flow or other controls.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.1.4.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.3.8	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe hygienic conditions.	4.3.4	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe hygienic conditions.	
4.3.9	Temporary structures constructed during building work or refurbishment etc. shall be designed and located to avoid pest harbourage and ensure the safety and quality of products.	4.3.5	Temporary structures constructed during building work or refurbishment etc. shall be designed and located to avoid pest harbourage and ensure the safety and quality of products.	

4.4 BUILDING FABRIC, RAW MATERIAL HANDLING, PREPARATION, PROCESSING, PACKING AND STORAGEAREAS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The fabrication of the site, buildings and facilities shall be suitable for the intended purpose.		The fabrication of the site, buildings and facilities shall be suitable for the intended purpose.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.4.1	Walls shall be finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.	4.4.1	Walls shall be finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.	
4.4.2	Floors shall be suitably hard wearing to meet the demands of the process, and withstand cleaning materials and methods. They shall be impervious, be maintained in good repair and facilitate cleaning.	4.4.2	Floors shall be suitably hard-wearing to meet the demands of the process, and withstand cleaning materials and methods. They shall be impervious, be maintained in good repair and facilitate cleaning.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.4.3	Drainage, where provided, shall be sited, designed and maintained to minimise risk of product contamination and not compromise product safety. Machinery and piping shall be arranged so that, wherever feasible, process waste water goes directly to drain. Where significant amounts of water are used, or direct piping to drain is not feasible, floors shall have adequate falls to cope with the flow of any water or effluent towards suitable drainage.	4.4.3	Drainage, where provided, shall be sited, designed and maintained to minimise risk of product contamination and not compromise product safety. Machinery and piping shall be arranged so that, wherever feasible, process waste water goes directly to drain. Where significant amounts of water are used, or direct piping to drain is not feasible, floors shall have adequate falls to cope with the flow of any water or effluent towards suitable drainage.	
4.4.4	Where sites include high-risk or high-care facilities, there shall be a map of the drains for these areas which shows the direction of flow and location of any equipment fitted to prevent the back-up of waste water. The flow of drains shall not present a risk of contamination of the high-risk/care area.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.2.1.
4.4.5	Ceilings and overheads shall be constructed, finished and maintained to prevent the risk of product contamination.	4.4.4	Ceilings and overheads shall be constructed, finished and maintained to prevent the risk of product contamination.	
4.4.6	Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed.	4.4.5	Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		4.4.6	Where elevated walkways are adjacent to or pass over production lines, they shall be: ● designed to prevent contamination of products and production lines ● easy to clean ● correctly maintained.	New requirement designed to ensure that products are not inadvertently contaminated where elevated walkways pass over production lines.
4.4.7	Where there is a risk to product, windows, and roof glazing which is designed to be opened for ventilation purposes, shall be adequately screened to prevent the ingress of pests.	4.4.7	Where there is a risk to product, windows and roof glazing which are designed to be opened for ventilation purposes shall be adequately screened to prevent the ingress of pests.	
4.4.8	Where they pose a risk to product, glass windows shall be protected against breakage.			Feedback during the consultation highlighted that most sites complete this activity as part of their glass controls. Therefore, the requirement has been relocated to Issue 8, clause 4.9.3.4 to form a complete section on glass control.
4.4.9	Doors shall be maintained in good condition: ● External doors and dock levellers shall be close fitting or adequately proofed. ● External doors to open product areas shall not be opened during production periods except in emergencies. Where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.	4.4.8	Doors (both internal and external) shall be maintained in good condition. At a minimum: ● external doors and dock levellers shall be close fitting or adequately proofed ● external doors to open product areas shall not be opened during production periods except in emergencies ● where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.	Clarification added to ensure that all doors are correctly managed.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.4.10	Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.	4.4.9	Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.	
4.4.11	Where they constitute a risk to product, bulbs and strip lights – including those on electric fly-killer devices – shall be adequately protected. Where full protection cannot be provided, alternative management such as wire-mesh screens or monitoring procedures shall be in place.			Feedback during the consultation highlighted that most sites complete this activity as part of their glass controls. Therefore, the requirement has been relocated to Issue 8, clause 4.9.3.5 to form a complete section on glass control.
4.4.12	Adequate ventilation and extraction shall be provided in product storage and processing environments to prevent condensation or excessive dust.	4.4.10	Adequate ventilation and extraction shall be provided in product storage and processing environments to prevent condensation or excessive dust.	
4.4.13	High-risk areas shall be supplied with sufficient changes of filtered air. The filter specification used and frequency of air changes shall be documented. This shall be based on a risk assessment, taking into account the source of the air and the requirement to maintain a positive air pressure relative to the surrounding areas.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.2.2.

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4.5 UTILITIES – WATER, ICE, AIR AND OTHER GASES

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Utilities used within the production and storage areas shall be monitored to effectively control the risk of product contamination.		Utilities used within the production and storage areas shall be monitored to effectively control the risk of product contamination.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.5.1	All water used as a raw material in the manufacture of processed food, the preparation of product, hand-washing or for equipment or plant cleaning shall be supplied in sufficient quantity, be potable at point of use or pose no risk of contamination according to applicable legislation. The microbiological and chemical quality of water shall be analysed at least annually. The sampling points, scope of the test and frequency of analysis shall be based on risk, taking into account the source of the water, on-site storage and distribution facilities, previous sample history and usage.	4.5.1	All water (including ice and steam) used as a raw material in the manufacture of processed food, the preparation of product, hand-washing or for equipment or plant cleaning shall be supplied in sufficient quantity, be potable at point of use or pose no risk of contamination according to applicable legislation. The microbiological and chemical quality of water shall be analysed at least annually. The sampling points, scope of the test and frequency of analysis shall be based on risk, taking into account the source of the water, on-site storage and distribution facilities, previous sample history and usage.	All water, whether in liquid form, ice or steam, requires the control when used as a raw material or comes into direct contact with product.
4.5.2	An up-to-date schematic diagram shall be available of the water distribution system on site, including holding tanks, water treatment and water recycling as appropriate. The diagram shall be used as a basis for water sampling and the management of water quality.	4.5.2	An up-to-date schematic diagram shall be available of the water distribution system on site, including holding tanks, water treatment and water recycling as appropriate. The diagram shall be used as a basis for water sampling and the management of water quality.	

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4.5.3	Where legislation specifically permits the use of water which may not be potable for initial product cleaning (e.g. for the storage/washing of fish), the water shall meet the designated legal requirements for this operation.			Legislative requirements are fully covered in Issue 8, clause 4.5.1. Therefore this separate clause is no longer required and has been removed from Issue 8.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.5.4	Air, other gases and steam used directly in contact with, or as an ingredient in, products shall be monitored to ensure this does not represent a contamination risk. Compressed air used directly in contact with the product shall be filtered.	4.5.3	Air and other gases used as an ingredient or that are in direct contact with products shall be monitored to ensure this does not represent a contamination risk. Compressed air that is in direct contact with the product shall be filtered at point of use.	Steam removed from this clause as this is fully covered by Issue 8, clause 4.5.1. Additional wording provided for clarity.

4.6 EQUIPMENT

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
All food-processing equipment shall be suitable for the intended purpose and shall be used to minimise the risk of contamination of product.		All food-processing equipment shall be suitable for the intended purpose and shall be used to minimise the risk of contamination of product.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.6.1	All equipment shall be constructed of appropriate materials. The design and placement of equipment shall ensure it can be effectively cleaned and maintained.	4.6.1	All equipment shall be constructed of appropriate materials. The design and placement of equipment shall ensure it can be effectively cleaned and maintained.	
4.6.2	Equipment which is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable.	4.6.2	Equipment that is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable.	

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4.7 MAINTENANCE

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.		An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.7.1	There shall be a documented planned maintenance schedule or condition monitoring system which includes all plant and processing equipment. The maintenance requirements shall be defined when commissioning new equipment.	4.7.1	There shall be a documented planned maintenance schedule or condition monitoring system which includes all plant and processing equipment. The maintenance requirements shall be defined when commissioning new equipment.	
4.7.2	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment damage, the equipment shall be inspected at predetermined intervals, inspection results documented and appropriate action taken.	4.7.2	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment damage, the equipment shall be inspected at predetermined intervals, the inspection results documented and appropriate action taken.	
4.7.3	Where temporary repairs are made, these shall be controlled to ensure the safety or legality of a product is not jeopardised. These temporary measures shall be permanently repaired as soon as practicable and within a defined timescale.	4.7.3	Where temporary repairs are made, these shall be documented and controlled to ensure that the safety or legality of products is not jeopardised. These temporary measures shall be permanently repaired as soon as practicable and within a defined timescale.	Record-keeping is important in this situation and is therefore highlighted within the clause.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.7.4	The site shall ensure that the safety or legality of product is not jeopardised during maintenance and subsequent cleaning operations. Maintenance work shall be followed by a documented hygiene clearance procedure, which records that product contamination hazards have been removed from machinery and equipment.	4.7.4	The site shall ensure that the safety or legality of products is not jeopardised during maintenance and subsequent cleaning operations. Maintenance work shall be followed by a documented hygiene clearance procedure. Equipment and machinery shall be inspected by an authorised member of staff to confirm the removal of contamination hazards, before being accepted back into operation.	To avoid potential contamination, good practice is to inspect equipment prior to its acceptance back into production.
4.7.5	Maintenance activities undertaken in high-risk and high-care areas shall respect the segregation requirements of the area. Wherever possible tools and equipment shall be dedicated for use in the area and be retained in the area.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.3.1.
4.7.6	Materials used for equipment and plant maintenance and that pose a risk by direct or indirect contact with raw materials, intermediate and finished products, such as lubricating oil, shall be food grade and of a known allergen status.	4.7.5	Materials and parts used for equipment and plant maintenance shall be of an appropriate grade or quality. Those materials (such as lubricating oil) that pose a risk by direct or indirect contact with raw materials (including primary packaging), intermediate products and finished products shall be food grade and of a known allergen status.	Clause rephrased to add clarity to the expectations.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.7.7	Engineering workshops shall be kept clean and tidy and controls shall be in place to prevent transfer of engineering debris to production or storage areas.	4.7.6	Engineering workshops shall be kept clean and tidy, and controls shall be in place to prevent transfer of engineering debris to production or storage areas.	

4.8 STAFF FACILITIES

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Staff facilities shall be sufficient to accommodate the required number of personnel, and shall be designed and operated to minimise the risk of product contamination. The facilities shall be maintained in good and clean condition.		Staff facilities shall be sufficient to accommodate the required number of personnel, and shall be designed and operated to minimise the risk of product contamination. The facilities shall be maintained in good and clean condition.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.8.1	Designated changing facilities shall be provided for all personnel, whether staff, visitor or contractor. These shall be sited to allow direct access to the production, packing or storage areas without recourse to any external area. Where this is not possible, a risk assessment shall be carried out and procedures implemented accordingly (e.g. the provision of cleaning facilities for footwear).	4.8.1	Designated changing facilities shall be provided for all personnel, whether staff, visitor or contractor. These shall be sited to allow direct access to the production, packing or storage areas without recourse to any external area. Where this is not possible, a risk assessment shall be carried out and procedures implemented accordingly (e.g. the provision of cleaning facilities for footwear).	
4.8.2	Storage facilities of sufficient size to accommodate personal items shall be provided for all personnel who work in raw material handling, preparation, processing, packing and storage areas.	4.8.2	Storage facilities of sufficient size to accommodate personal items shall be provided for all personnel who work in raw material handling, preparation, processing, packing and storage areas.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.8.3	Outdoor clothing and other personal items shall be stored separately from production clothing within the changing facilities. Facilities shall be available to separate clean and dirty production clothing.	4.8.3	Outdoor clothing and other personal items shall be stored separately from production clothing within the changing facilities. Facilities shall be available to separate clean and dirty production clothing.	
4.8.4	Where an operation includes a high-risk area, personnel shall enter via a specially designated changing facility at the entrance to the high-risk area. The changing facilities shall meet the following requirements: ● Clear instructions shall be provided for the order of changing into and out of dedicated protective clothes to prevent the contamination of clean clothing. ● Protective clothing shall be visually distinctive from that worn in other areas and shall not be worn outside the high-risk area. ● Hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing (i.e. hand-washing after hair covering and footwear has been put on, but before handling clean protective clothing). ● Prior to entry to high-risk areas, hand-washing and disinfection shall be provided and used.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.4.1.

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.8.4 *cont.*	• Dedicated footwear shall be provided to be worn in the high-risk area with an effective system to segregate areas for wearing high-risk and other footwear (i.e. a barrier or bench system). By exception the use of boot-wash facilities is accepted where these demonstrably provide an effective control of footwear to prevent the introduction of pathogenic material into high-risk areas. A programme of environmental monitoring shall be established to assess the effectiveness of footwear controls.			
4.8.5	Where an operation includes a high-care area, personnel shall enter via a specially designated changing facility with arrangements to ensure that protective clothing will not be contaminated before entry to the high-care area. This shall incorporate the following requirements: • Clear instructions for the order of changing into and out of dedicated protective clothes to prevent the contamination of clean clothing. • Site-provided footwear shall not be worn outside the factory. • Protective clothing shall be visually distinctive from that worn in lower risk areas and shall not be worn outside of the high-care area.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.4.1.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.8.5 *cont.*	• Hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing. • On entry to high-care areas, hand-washing and disinfection shall be provided and used. There shall be an effective control of footwear to prevent the introduction of pathogens into high-care areas. This may be by a controlled change of footwear before entering the area or by the use of controlled and managed boot-wash facilities. A programme of environmental monitoring shall be established to assess the effectiveness of footwear controls.			
4.8.6	Suitable and sufficient hand-washing facilities shall be provided at access to, and at other appropriate points within, production areas. Such hand-washing facilities shall provide as a minimum: • advisory signs to prompt hand-washing • a sufficient quantity of water at a suitable temperature • water taps with hands-free operation • liquid/foam soap • single-use towels or suitably designed and located air driers.	4.8.4	Suitable and sufficient hand-washing facilities shall be provided at access to, and at other appropriate points within, production areas. Such hand-washing facilities shall provide, at a minimum: • advisory signs to prompt hand-washing • a sufficient quantity of water at a suitable temperature • water taps with hands-free operation • liquid/foam soap • single-use towels or suitably designed and located air driers.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.8.7	Toilets shall be adequately segregated and shall not open directly into production or packing areas. Toilets shall be provided with hand-washing facilities comprising: ● basins with soap and water at a suitable temperature ● adequate hand-drying facilities ● advisory signs to prompt hand-washing. Where hand-washing facilities within toilet facilities are the only facilities provided before re-entering production, the requirements of clause 4.8.6 shall apply and signs shall be in place to direct people to hand-washing facilities before entering production.	4.8.5	Toilets shall be adequately segregated and shall not open directly into production or packing areas. Toilets shall be provided with hand-washing facilities comprising: ● basins with soap and water at a suitable temperature ● adequate hand-drying facilities ● advisory signs to prompt hand-washing. Where hand-washing facilities within toilet facilities are the only facilities provided before re-entering production, the requirements of clause 4.8.4 shall apply and signs shall be in place to direct people to hand-washing facilities before entering production.	
4.8.8	Where smoking is allowed under national law, designated controlled smoking areas shall be provided which are both isolated from production areas to an extent that ensures smoke cannot reach the product and fitted with sufficient extraction to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall be provided at smoking facilities, both inside and at exterior locations. Electronic cigarettes shall not be permitted to be used or brought into production or storage areas.	4.8.6	Where smoking is allowed under national law, designated controlled smoking areas shall be provided which are both isolated from production areas to an extent that ensures smoke cannot reach the product and fitted with sufficient extraction to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall be provided at smoking facilities, both inside and at exterior locations. Electronic cigarettes shall not be permitted to be used or brought into production or storage areas.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.8.9	All food brought into manufacturing premises by staff shall be appropriately stored in a clean and hygienic state. No food shall be taken into storage, processing or production areas. Where eating of food is allowed outside during breaks, this shall be in suitable designated areas with appropriate control of waste.	4.8.7	All food brought into manufacturing premises by staff shall be appropriately stored in a clean and hygienic state. No food shall be taken into storage, processing or production areas. Where eating of food is allowed outside during breaks, this shall be in suitable designated areas with appropriate control of waste.	
4.8.10	Where catering facilities are provided on the premises, they shall be suitably controlled to prevent contamination of products (e.g. as a source of food poisoning or introduction of allergenic material to the site).	4.8.8	Where catering facilities (including vending machines) are provided on the premises, they shall be suitably controlled to prevent contamination of products (e.g. as a source of food poisoning or introduction of allergenic material to the site).	

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4.9 CHEMICAL AND PHYSICAL PRODUCT CONTAMINATION CONTROL: RAW MATERIAL HANDLING, PREPARATION, PROCESSING, PACKING AND STORAGE AREAS

ISSUE 7	ISSUE 8	
STATEMENT OF INTENT	STATEMENT OF INTENT	COMMENTS
Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product.	Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product.	

4.9.1 CHEMICAL CONTROL

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.9.1.1	Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination. These shall include as a minimum: ● an approved list of chemicals for purchase ● availability of material safety data sheets and specifications ● confirmation of suitability for use in a food-processing environment ● avoidance of strongly scented products ● the labelling and/or identification of containers of chemicals at all times ● a designated storage area with restricted access to authorised personnel ● use by trained personnel only.	4.9.1.1	Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination. These shall include, at a minimum: ● an approved list of chemicals for purchase ● availability of material safety data sheets and specifications ● confirmation of suitability for use in a food-processing environment ● avoidance of strongly scented products ● the labelling and/or identification of containers of chemicals at all times ● a designated storage area with restricted access to authorised personnel ● use by trained personnel only.	
4.9.1.2	Where strongly scented or taint-forming materials have to be used, for instance for building work, procedures shall be in place to prevent the risk of taint contamination of products.	4.9.1.2	Where strongly scented or taint-forming materials have to be used, for instance for building work, procedures shall be in place to prevent the risk of taint contamination of products.	

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4.9.2 METAL CONTROL

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.9.2.1	There shall be a documented policy for the control of the use of sharp metal implements including knives, cutting blades on equipment, needles and wires. This shall include a record of inspection for damage and the investigation of any lost items. Snap-off-blade knives shall not be used.	4.9.2.1	There shall be a documented policy for the controlled use and storage of sharp metal implements including knives, cutting blades on equipment, needles and wires. This shall include a record of inspection for damage and the investigation of any lost items. Snap-off blade knives shall not be used.	
4.9.2.2	The purchase of ingredients and packaging which use staples or other foreign-body hazards as part of the packaging materials shall be avoided. Staples, paper clips and drawing pins shall not be used in open product areas. Where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimise the risk of product contamination.	4.9.2.2	The purchase of ingredients and packaging which use staples or other foreign-body hazards as part of the packaging materials shall be avoided. Staples, paper clips and drawing pins shall not be used in open product areas. Where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimise the risk of product contamination.	

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4.9.3 GLASS, BRITTLE PLASTIC, CERAMICS AND SIMILAR MATERIALS

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.9.3.1	Glass or other brittle materials shall be excluded or protected against breakage in areas where open products are handled or there is a risk of product contamination.	4.9.3.1	Glass or other brittle materials shall be excluded or protected against breakage in areas where open products are handled or there is a risk of product contamination.	
4.9.3.2	Documented procedures for handling glass and other brittle materials (other than product packaging) shall be in place where open products are handled or there is a risk of product contamination. These procedures shall include as a minimum: ● a list of items detailing location, number, type and condition ● recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product ● details on cleaning or replacing items to minimise potential for product contamination.	4.9.3.2	Procedures for handling glass and other brittle materials (other than product packaging) shall be in place where open products are handled or there is a risk of product contamination. These procedures shall include, at a minimum: ● a list of items detailing location, number, type and condition ● recorded checks of the condition of items, carried out at a specified frequency that is based on the level of risk to the product ● details on cleaning or replacing items to minimise the potential for product contamination.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.9.3.3	Documented procedures detailing the action to be taken in case of breakage of glass or other brittle items shall be implemented and include the following: ● quarantining the products and production area that were potentially affected ● cleaning the production area ● inspecting the production area and authorising to continue production ● changing of workwear and inspection of footwear ● specifying those staff authorised to carry out the above points ● recording the breakage incident.	4.9.3.3	Procedures detailing the action to be taken in case of breakage of glass or other brittle items shall be implemented and include the following: ● training of staff in the correct procedure ● quarantining the products and production area that were potentially affected ● cleaning the production area ● inspecting the production area and authorising production to continue ● changing of workwear and inspection of footwear ● specifying those staff authorised to carry out the above points ● recording the breakage incident ● safely disposing of contaminated product.	
		4.9.3.4	Where they pose a risk to product, glass windows shall be protected against breakage.	Relocated from Issue 7, clause 4.4.8.
		4.9.3.5	Where they pose a risk to product, bulbs and strip lights (including those on electric fly-killer devices) shall be adequately protected. Where full protection cannot be provided, alternative management such as wire-mesh screens or monitoring procedures shall be in place.	Relocated from Issue 7, clause 4.4.11.

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4.9.4 PRODUCTS PACKED INTO GLASS OR OTHER BRITTLE CONTAINERS

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.9.4.1	The storage of the containers shall be segregated from the storage of raw materials, product or other packaging.	4.9.4.1	The storage of the containers shall be segregated from the storage of raw materials, product or other packaging.	
4.9.4.2	Systems shall be in place to manage container breakages between the container cleaning/ inspection point and container closure. This shall include, as a minimum, documented instructions which ensure: ● the removal and disposal of at-risk products in the vicinity of the breakage; this may be specific for different equipment or areas of the production line ● the effective cleaningof the line or equipment which may be contaminated by fragments of the container; cleaning shall not result in the further dispersal of fragments, for instance by the use of high pressure water or air ● the use of dedicated, clearly identifiable cleaning equipment (e.g. colour coded) for removal of container breakages; such equipment shall be stored separately from other cleaning equipment ● the use of dedicated, accessible, lidded waste containers for the collection of damaged containers and fragments	4.9.4.2	Systems shall be in place to manage container breakages between the container cleaning/ inspection point and container closure. This shall include, at a minimum, documented instructions which ensure: ● the removal and disposal of at-risk products in the vicinity of the breakage; this may be specific for different equipment or areas of the production line ● the effective cleaningof the line or equipment which may be contaminated by fragments of the container; cleaning shall not result in the further dispersal of fragments, for instance by the use of high-pressure water or air ● the use of dedicated, clearly identifiable cleaning equipment (e.g. colour-coded) for removal of container breakages; such equipment shall be stored separately from other cleaning equipment ● the use of dedicated, accessible, lidded waste containers for the collection of damaged containers and fragments	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.9.4.2 *cont.*	• a documented inspection of production equipment is undertaken following the cleaning of a breakage to ensure cleaning has effectively removed any risk of further contamination • authorisation isgiven for production to restart following cleaning • the area around theline is kept clear ofbroken glass.		• a documented inspection of production equipment is undertaken following the cleaning of a breakage to ensure cleaning has effectively removed any risk of further contamination • authorisation isgiven for production to restart following cleaning • the area around theline is kept clear ofbroken glass.	
4.9.4.3	Records shall be maintained of all container breakages on the line. Where no breakages have occurred during a production period, this shall also be recorded. This record shall be reviewed to identify trends and potential line or container improvements.	4.9.4.3	Records shall be maintained of all container breakages on the line. Where no breakages have occurred during a production period, this shall also be recorded. This record shall be reviewed to identify trends and potential line or container improvements.	

4.9.5 WOOD

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.9.5.1	Wood should not be used in open product areas except where this is a process requirement (e.g. maturation of products in wood). Where the use of wood cannot be avoided, the condition of wood shall be continually monitored to ensure it is in good condition and free from damage or splinters which could contaminate products.	4.9.5.1	Wood should not be used in open product areas except where this is a process requirement (e.g. maturation of products in wood). Where the use of wood cannot be avoided, the condition of wood shall be continually monitored to ensure it is in good condition and free from damage or splinters which could contaminate products.	

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4.9.6 OTHER PHYSICAL CONTAMINANTS

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		4.9.6.1	Procedures shall be in place to prevent physical contamination of raw materials by raw material packaging (e.g. during debagging and deboxing procedures to remove the packaging).	New requirement to prevent potential contamination issues with debagging and deboxing.
		4.9.6.2	Pens used in open product areas shall be controlled to minimise the risk of physical contamination (e.g. designed without small parts and detectable by foreign-body detection equipment).	New requirement to prevent potential contamination issues related to pens in the production environment.

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4.10 FOREIGN-BODY DETECTION AND REMOVAL EQUIPMENT

ISSUE 7	ISSUE 8	
STATEMENT OF INTENT	STATEMENT OF INTENT	COMMENTS
The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies.	The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies.	

4.10.1 SELECTION AND OPERATION OF FOREIGN-BODY DETECTION AND REMOVAL EQUIPMENT

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.1.1	A documented assessment in association with the HACCP study shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign-body contamination. Typical equipment to be considered may include: ● filters ● sieves ● metal detection ● magnets ● optical sorting equipment ● X-ray detection equipment ● other physical separation equipment (e.g. gravity separation, fluid bed technology).	4.10.1.1	A documented assessment in association with the HACCP study shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign-body contamination. Typical equipment to be considered may include: ● filters ● sieves ● metal detection ● magnets ● optical sorting equipment ● X-ray detection equipment ● other physical separation equipment (e.g. gravity separation, fluid bed technology).	
4.10.1.2	The type, location and sensitivity of the detection and/or removal method shall be specified as part of the site's documented system. Industry best practice shall be applied with regard to the nature of the ingredient, material, product and/or the packed product. The location of the equipment or any other factors influencing the sensitivity of the equipment shall be validated and justified.	4.10.1.2	The type, location and sensitivity of the detection and/or removal method shall be specified as part of the site's documented system. Industry best practice shall be applied with regard to the nature of the ingredient, material, product and/or the packed product. The location of the equipment or any other factors influencing the sensitivity of the equipment shall be validated and justified.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.1.3	The site shall ensure that the frequency of the testing of the foreign-body detection and/or removal equipment is defined and takes into consideration: ● specific customer requirements ● the site's ability to identify, hold and prevent the release of any affected materials, should the equipment fail.	4.10.1.3	The site shall ensure that the frequency of the testing of the foreign-body detection and/or removal equipment is defined and takes into consideration: ● specific customer requirements ● the site's ability to identify, hold and prevent the release of any affected materials, should the equipment fail. The site shall establish and implement corrective action and reporting procedures in the event of a failure of the foreign-body detector and/or removal equipment. Action shall include a combination of isolation, quarantining and re-inspection of all products produced since the last successful test or inspection.	Additional text relocated from Issue 7, clause 4.10.3.5 to emphasise that corrective actions are required whenever there is a failure of the foreign-body detector/removal equipment (it was previously located in the section dealing only with metal detectors).
4.10.1.4	Where foreign material is detected or removed by the equipment, the source of any unexpected material shall be investigated. Information on rejected materials shall be used to identify trends and where possible instigate preventive action to reduce the occurrence of contamination by the foreign material.	4.10.1.4	Where foreign material is detected or removed by the equipment, the source of any unexpected material shall be investigated. Information on rejected materials shall be used to identify trends and, where possible, instigate preventive action to reduce the occurrence of contamination by the foreign material.	

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4.10.2 FILTERS AND SIEVES

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.2.1	Filters and sieves used for foreign-body control shall be of a specified mesh size or gauge and designed to provide the maximum practical protection for the product. Material retained or removed by the system shall be examined and recorded to identify contamination risks.	4.10.2.1	Filters and sieves used for foreign-body control shall be of a specified mesh size or gauge and designed to provide the maximum practical protection for the product.	Final sentence removed as it overlaps with clause 4.10.1.4, which applies to all foreign bodies.
4.10.2.2	Filters and sieves shall be regularly inspected or tested for damage on a documented frequency based on risk. Records shall be maintained of the checks. Where defective filters or sieves are identified this shall be recorded and the potential for contamination of products investigated and appropriate action taken.	4.10.2.2	Filters and sieves shall be regularly inspected or tested for damage at a documented frequency based on risk. Records shall be maintained of the checks. Where defective filters or sieves are identified this shall be recorded and the potential for contamination of products investigated and appropriate action taken.	

4.10.3 METAL DETECTORS AND X-RAY EQUIPMENT

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.3.1	Metal detection equipment shall be in place unless risk assessment demonstrates that this does not improve the protection of final products from metal contamination. Where metal detectors are not used justification shall be documented. The absence of metal detection would only normally be based on the use of an alternative, more effective method of protection (e.g. use of X-ray, fine sieves or filtration of products).	4.10.3.1	Metal detection equipment shall be in place unless risk assessment demonstrates that this does not improve the protection of final products from metal contamination. Where metal detectors are not used justification shall be documented. The absence of metal detection would only normally be based on the use of an alternative, more effective method of protection (e.g. use of X-ray, fine sieves or filtration of products).	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.3.2	The metal detector or X-ray equipment shall incorporate one of the following: ● an automatic rejection device, for continuous in-line systems, which shall either divert contaminated product out of the product flow or to a secure unit accessible only to authorised personnel ● a belt stop system with an alarm where the product cannot be automatically rejected (e.g. for very large packs) ● in-line detectors which identify the location of the contaminant to allow effective segregation of the affected product.	4.10.3.2	The metal detector or X-ray equipment shall incorporate one of the following: ● an automatic rejection device, for continuous in-line systems, which shall either divert contaminated product out of the product flow or to a secure unit accessible only to authorised personnel ● a belt stop system with an alarm where the product cannot be automatically rejected (e.g. for very large packs) ● in-line detectors which identify the location of the contaminant to allow effective segregation of the affected product.	
4.10.3.3	The site shall establish and implement documented procedures for the operation and testing of the metal detection or X-ray equipment. This shall include as a minimum: ● responsibilities for the testing of equipment ● the operating effectiveness and sensitivity of the equipment and any variation to this for particular products ● the methods and frequency of checking the detector ● recording of the results of checks.	4.10.3.3	The site shall establish and implement procedures for the operation and testing of the metal detection or X-ray equipment. This shall include, at a minimum: ● responsibilities for the testing of equipment ● the operating effectiveness and sensitivity of the equipment and any variation to this for particular products ● the methods and frequency of checking the detector ● recording of the results of checks.	As per previous comments – the glossary in the Standard confirms that all procedures must be documented; therefore it is not necessary to state 'documented' in every clause, as the glossary has already confirmed this as a requirement.

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.10.3.4	Metal detector checking procedures shall be based on good practice and shall as a minimum include the following: ● Use of test pieces incorporating a sphere of metal of a known diameter selected on the basis of risk. The test pieces shall be marked with the size and type of test material contained. ● Tests carried out using separate test pieces containing ferrous metal, stainless steel and typically non- ferrous metal, unless the product is within a foil container where ferrous only may be applicable. ● A test that both the detection and rejection mechanisms are working effectively under normal working conditions. ● Checks that test the memory/reset function of the metal detector by passing successive test packs through the unit at typical line operating speed. ● Checks of failsafe systems fitted to the detection and rejection systems. In addition, where metal detectors are incorporated on conveyors, the test piece shall be passed as close as possible to the centre of the metal detector aperture and wherever possible be carried out by inserting the test piece within a clearly identified sample pack of the food being produced at the time of the test.	4.10.3.4	Metal detector testing procedures shall, at a minimum, include: ● use of test pieces incorporating a sphere of metal of a known diameter selected on the basis of risk. The test pieces shall be marked with the size and type of test material contained ● tests carried out using separate test pieces containing ferrous metal, stainless steel and typically non- ferrous metal, unless the product is within a foil container where a ferrous-only test may be applicable ● a test to prove that both the detection and rejection mechanisms are working effectively under normal working conditions ● tests of the metal detector by passing successive test packs through the unit at typical line operating speed ● checks of failsafe systems fitted to the detection and rejection systems. In addition, where metal detectors are incorporated on conveyors, the test piece shall be passed as close as possible to the centre of the metal detector aperture. Wherever possible, the test piece shall be inserted within a clearly identified sample pack of the food being produced at the time of the test.	Slight rewording to clarify expectations.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.3.4 *cont.*	Where in-line metal detectors are used the test piece shall be placed in the product flow wherever this is possible and the correct timing of the rejection system to remove identified contamination shall be validated.	4.10.3.4 *cont.*	Where in-line metal detectors are used, the test piece shall be placed in the product flow wherever this is possible and the correct timing of the rejection system to remove identified contamination shall be validated. Testing of in-line metal detectors shall be completed during both line start-up and at the end of the production period.	
4.10.3.5	The site shall establish and implement corrective action and reporting procedures in the event of the testing procedure identifying any failure of the foreign-body detector. Action shall include a combination of isolation, quarantining and re-inspection of all product produced since the last successful test.			Relocated to Issue 8, clause 4.10.1.3, as this should apply to all foreign-body detectors/removal equipment and not be limited to metal detectors.

4.10.4 MAGNETS

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.4.1	The type, location and strength of magnets shall be fully documented. Documented procedures shall be in place for the inspection, cleaning, strength testing and integrity checks. Records of all checks shall be maintained.	4.10.4.1	The type, location and strength of magnets shall be fully documented. Procedures shall be in place for the inspection, cleaning, strength testing and integrity checks. Records of all checks shall be maintained.	

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4.10.5 OPTICAL SORTING EQUIPMENT

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.5.1	Each unit shall be checked in accordance with the manufacturer's instructions or recommendations. Checks shall be documented.	4.10.5.1	Each unit shall be checked in accordance with the manufacturer's instructions or recommendations. Checks shall be documented.	

4.10.6 CONTAINER CLEANLINESS - GLASS JARS, CANS AND OTHER RIGID CONTAINERS

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.10.6.1	Based on risk assessment, procedures shall be implemented to minimise foreign-body contamination originating with the packaging container (e.g. jars, cans and other pre-formed rigid containers). This may include the use of covered conveyors, container inversion and foreign-body removal through rinsing with water or air jets.	4.10.6.1	Based on risk assessment, procedures shall be implemented to minimise foreign-body contamination originating from the packaging container (e.g. jars, cans and other pre-formed rigid containers). This may include the use of covered conveyors, container inversion and foreign-body removal through rinsing with water or air jets.	
4.10.6.2	The effectiveness of the container cleaning equipment shall be checked and recorded during each production. Where the system incorporates a rejection system for dirty or damaged containers, the check shall incorporate a test of both the detection and effective rejection of the test container.	4.10.6.2	The effectiveness of the container-cleaning equipment shall be checked and recorded during each production. Where the system incorporates a rejection system for dirty or damaged containers, the check shall incorporate a test of both the detection and effective rejection of the test container.	

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4.11 HOUSEKEEPING AND HYGIENE

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
Housekeeping and cleaning systems shall be in place which ensure appropriate standards of hygiene are maintained at all times and the risk of product contamination is minimised.		Housekeeping and cleaning systems shall be in place which ensure appropriate standards of hygiene are maintained at all times and the risk of product contamination is minimised.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.11.1	The premises and equipment shall be maintained in a clean and hygienic condition.	4.11.1	The premises and equipment shall be maintained in a clean and hygienic condition.	
4.11.2	Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures for processing equipment, food contact surfaces and environmental cleaning in high-care/high-risk areas shall as a minimum include the: ● responsibility for cleaning ● item/area to be cleaned ● frequency of cleaning ● method of cleaning, including dismantling equipment for cleaning purposes where required ● cleaning chemicals and concentrations ● cleaning materials to be used ● cleaning records and responsibility for verification. The frequency and methods of cleaning shall be based on risk. The procedures shall be implemented to ensure appropriate standards of cleaning are achieved.	4.11.2	Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures for the processing equipment and food contact surfaces shall, at a minimum, include: ● responsibility for cleaning ● item/area to be cleaned ● frequency of cleaning ● method of cleaning, including dismantling equipment for cleaning purposes where required ● cleaning chemicals and concentrations ● cleaning materials to be used ● cleaning records and responsibility for verification. The frequency and methods of cleaning shall be based on risk. The procedures shall be implemented to ensure appropriate standards of cleaning are achieved.	To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.5.1.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.3	As a minimum for food contact surfaces, processing equipment and for environmental cleaning in high-care/high-risk areas, limits of acceptable and unacceptable cleaning performance shall be defined. This shall be based on the potential hazards (e.g. microbiological, allergen, foreign-body contamination or product-to-product contamination). Acceptable levels of cleaning may be defined by visual appearance, ATP bioluminescence techniques (see glossary), microbiological testing or chemical testing as appropriate. Where cleaning procedures are part of a defined prerequisite plan to control the risk of a specific hazard the cleaning and disinfection procedures and frequency shall be validated and records maintained. This shall include the risk from cleaning chemical residues on food contact surfaces.	4.11.3	Limits of acceptable and unacceptable cleaning performance shall be defined for food contact surfaces and processing equipment. These limits shall be based on the potential hazards relevant to the product or processing area (e.g. microbiological, allergen, foreign-body contamination or product-to-product contamination). Therefore, acceptable levels of cleaning may be defined by visual appearance, ATP bioluminescence techniques (see glossary), microbiological testing, allergen testing or chemical testing as appropriate. The site shall define the corrective action to be taken when monitored results are outside of the acceptable limits. Where cleaning procedures are part of a defined prerequisite plan to control the risk of a specific hazard, the cleaning and disinfection procedures and their frequency shall be validated and records maintained. This shall include the risk from cleaning chemical residues on food contact surfaces.	To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.5.2.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.4	The resources for undertaking cleaning shall be available. Where it is necessary to dismantle equipment for cleaning purposes or to enter large equipment for cleaning, this shall be appropriately scheduled and, where necessary, planned for non-production periods. Cleaning staff shall be adequately trained or engineering support provided where access within equipment is required for cleaning.	4.11.4	The resources for undertaking cleaning shall be available. Where it is necessary to dismantle equipment for cleaning purposes or to enter large equipment for cleaning, this shall be appropriately scheduled and, where necessary, planned for non-production periods. Cleaning staff shall be adequately trained or engineering support provided where access within equipment is required for cleaning.	
4.11.5	The cleanliness of equipment shall be checked before equipment is released back into production. The results of checks on cleaning, including visual, analytical and microbiological checks, shall be recorded and used to identify trends in cleaning performance and instigate improvements where required.	4.11.5	The cleanliness of equipment shall be checked before equipment is released back into production. The results of checks on cleaning, including visual, analytical and microbiological checks, shall be recorded and used to identify trends in cleaning performance and to instigate improvements where required.	
4.11.6	Cleaning equipment shall be: ● hygienically designed and fit for purpose ● suitably identified for intended use (e.g. colour coded or labelled) ● cleaned and stored in a hygienic manner to prevent contamination. Equipment used for cleaning in high-care and high-risk areas shall be visually distinctive and dedicated for use in that area.	4.11.6	Cleaning equipment shall be: ● hygienically designed and fit for purpose ● suitably identified for intended use (e.g. colour-coded or labelled) ● cleaned and stored in a hygienic manner to prevent contamination.	To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.5.3.

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4.11.7 CLEANING IN PLACE (CIP)

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.7.1	Cleaning-in-place (CIP) facilities, where used, shall be monitored and maintained to ensure their effective operation.	4.11.7.1	All CIP equipment shall be designed and constructed to ensure effective operation. This shall include: ● validation confirming the correct design and operation of the system ● an up-to-date schematic diagram of the layout of the CIP system ● where rinse solutions are recovered and reused, an assessment of the risk of cross-contamination (e.g. due to the re-introduction of allergen). Alterations or additions to the CIP system shall be authorised by a suitably competent individual before changes are made. A record of changes shall be maintained. The system shall be revalidated at a frequency based on risk, and following any alteration or addition.	Section 4.11.7 has been substantively rewritten to add clarity to the requirements. Significant information has also been added to the interpretation guideline for Issue 8, highlighting key aspects of the CIP systems that should be managed.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.7.2	A schematic diagram of the layout of the CIP system including process piping circuits shall be available. There shall be an inspection report or other validation that: ● systems are hygienically designed with no dead areas, limited interruptions to flow streams and good system drain ability ● scavenge/return pumps are operated to ensure that there is no build-up of CIP solutions in the vessels ● spray balls and rotating spray devices effectively clean vessels by providing full surface coverage and are periodically inspected for blockages ● CIP equipment has adequate separation from active product lines (e.g. through the use of double seat valves, manually controlled links, blanks in pipework or make-or-break connections with proxy switches as interlocks) to prevent or safeguard against cross-contamination. The system shall be revalidated following alterations or additions to the CIP equipment. A log of changes to the CIP system shall be maintained.	4.11.7.2	Limits of acceptable and unacceptable performance for key process parameters shall be defined to ensure the removal of target hazards (e.g. soil, allergens, micro-organisms, spores). At a minimum these parameters shall include: ● times for each stage ● detergent concentrations ● flow rate and pressure ● temperatures. These shall be validated and records of the validation maintained.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.7.3	The CIP equipment shall be operated to ensure effective cleaning is carried out: ● The process parameters, time, detergent concentrations, flow rate and temperatures shall be defined to ensure removal of the appropriate target hazard (e.g. soil, allergens, vegetative micro-organisms, spores). This shall be validated and records of the validation maintained. ● Detergent concentrations shall be checked routinely. ● CIP process verification shall be undertaken by analysis of rinse waters and/or first product through the line for the presence of cleaning fluids or by tests of ATP (bioluminescence techniques), allergens or micro-organisms as appropriate. ● Detergent tanks shall be kept stocked up and a log maintained of when these are drained, cleaned, filled and emptied. Recovered post-rinse solutions shall be monitored for a build-up of carry-over from the detergent tanks. ● Filters, where fitted, shall be cleaned and inspected at a defined frequency.	4.11.7.3	The CIP equipment shall be maintained by suitably trained staff to ensure effective cleaning is carried out. This shall include: ● detergent concentrations shall be checked routinely ● recovered post-rinse solutions shall be monitored for build-up of carry-over from the detergent tanks ● filters, where fitted, shall be cleaned and inspected at a defined frequency ● where used, flexible hoses shall be stored hygienically when not in use, and inspected at a defined frequency to ensure that they are in good condition.	

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CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		4.11.7.4	CIP facilities, where used, shall be monitored at a defined frequency based on risk. This may include: ● monitoring of process parameters defined in clause 4.11.7.2 ● ensuring correct connections, piping and settings are in place ● confirming the process is operating correctly (e.g. valves opening/ closing sequentially) ● ensuring effective completion of the cleaning cycle ● monitoring for effective results, including draining where required. Procedures shall define the action to be taken if monitoring indicates that processing is outside the defined limits.	

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4.11.8 ENVIRONMENTAL MONITORING

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
		Risk-based environmental monitoring programmes shall be in place for pathogens or spoilage organisms. At a minimum, these shall include all production areas with open and ready-to-eat products.		Issue 8 of the Standard contains an entirely new section (4.11.8) on the requirements for environmental monitoring. These have been added to ensure that where sites have production areas containing open products, there is suitable monitoring (and where needed, control) of micro-organisms (pathogen and/or spoilage) that may be present in the factory and could therefore represent a risk to product.
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
		4.11.8.1	The design of the environmental monitoring programme shall be based on risk, and at a minimum include: ● sampling protocol ● identification of sample locations ● frequency of tests ● target organism(s) (e.g. pathogens, spoilage organisms and/or indicator organisms) ● test methods (e.g. settle plates, rapid testing and swabs) ● recording and evaluation of results. The programme and its associated procedures shall be documented.	
		4.11.8.2	Appropriate control limits shall be defined for the environmental monitoring programme. The company shall document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate an upward trend of positive results.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		4.11.8.3	The company shall review the environmental monitoring programme at least annually and whenever there are: ● changes in processing conditions, processflow or equipment ● new developments in scientific information ● failures of the programme to identify a significant issue (e.g. regulatory authority tests identifying positive results which the site programme did not) ● product failures (products with positive tests) ● consistently negative results (e.g. a site witha long history of negative results should review its programme to consider whether the correct parts of the factory are being tested, whether the testing is being conducted correctly, whether the tests are for the appropriate organisms, etc.).	

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4.12 WASTE/WASTE DISPOSAL

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests.		Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.12.1	Where licensing is required by law for the removal of waste, it shall be removed by licensed contractors and records of removal shall be maintained and available for audit.	4.12.1	Where licensing is required by law for the removal of waste, it shall be removed by licensed contractors and records of removal shall be maintained and available for audit.	
4.12.2	External waste collection containers and rooms housing waste facilities shall be managed to minimise risk. These shall be: ● clearly identified ● designed for ease of use and effective cleaning ● well maintained to allow cleaning and, where required, disinfection ● emptied at appropriate frequencies ● covered or doors kept closed as appropriate.	4.12.2	Internal and external waste collection containers and rooms housing waste facilities shall be managed to minimise risk. These shall be: ● clearly identified ● designed for ease of use and effective cleaning ● well maintained to allow cleaning and, where required, disinfection ● emptied at appropriate frequencies. External waste containers shall be covered or doors kept closed as appropriate.	Minor amendment to highlight that all waste containers need to be managed to ensure that they cannot be a source of product contamination.
4.12.3	If unsafe products or substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in secure product or waste disposal and shall provide records which include the quantity of waste collected for destruction or disposal.	4.12.3	If unsafe products or substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in secure product or waste disposal and shall provide records which include the quantity of waste collected for destruction or disposal.	

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4.13 MANAGEMENT OF SURPLUS FOOD AND PRODUCTS FOR ANIMAL FEED

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Effective processes shall be in place to ensure the safety and legality of by-products of the primary processing activity of the site.		Effective processes shall be in place to ensure the safety and legality of by-products of the primary processing activity of the site.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.13.1	Surplus customer-branded products shall be disposed of in accordance with customer-specific requirements. Customer brand names shall be removed from packed surplus products under the control of the factory before the product enters the supply chain unless authorised otherwise by the customer.	4.13.1	Surplus customer-branded products shall be disposed of in accordance with customer-specific requirements. Customer brand names shall be removed from packed surplus products under the control of the factory before the product enters the supply chain, unless otherwise authorised by the customer.	
4.13.2	Where customer-branded products which do not meet specification are sold to staff or passed on to charities or other organisations this shall be with the prior consent of the brand owner. Processes shall be in place to ensure that all products are fit for consumption and meet legal requirements.	4.13.2	Where customer-branded products which do not meet specifications are sold to staff or passed on to charities or other organisations, this shall be with the prior consent of the brand owner. Processes shall be in place to ensure that all products are fit for consumption and meet legal requirements.	
4.13.3	By-products and downgraded/surplus products intended for animal feed shall be segregated from waste and protected from contamination during storage. Products for animal feed shall be managed in accordance with relevant legislative requirements.	4.13.3	By-products and downgraded/surplus products intended for animal feed shall be segregated from waste and protected from contamination during storage. Products for animal feed shall be managed in accordance with the relevant legislative requirements.	

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4.14 PEST CONTROL (NOW PEST MANAGEMENT)

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
The whole site shall have an effective preventive pest control programme in place to minimise the risk of infestation and there shall be the resources available to respond rapidly to any issues which occur to prevent risk to products.		The whole site shall have an effective preventive pest management programme in place to minimise the risk of infestation and resources shall be available to respond rapidly to any issues which occur to prevent risk to products. Pest management programmes shall comply with all applicable legislation.		Terminology has been reviewed throughout this section. In particular, 'pest control' is the term used when there is a pest on site or in buildings, whereas 'pest management' describes the majority of site activities that are designed to prevent pest activity.
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.14.1	If pest activity is identified it shall not present a risk of contamination to products, raw materials or packaging. The presence of any infestation on site shall be identified in pest control records and be part of an effective pest management programme to eliminate or manage the infestation such that it does not present a risk to products, raw materials or packaging.	4.14.1	If pest activity is identified, it shall not present a risk of contamination to products, raw materials or packaging. The presence of any infestation on site shall be documented in pest management records and be part of an effective pest control programme to eliminate or manage the infestation so that it does not present a risk to products, raw materials or packaging.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.14.2	The site shall either contract the services of a competent pest control organisation, or shall have appropriately trained staff, for the regular inspection and treatment of the site to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and shall be documented. Where the services of a pest control contractor are employed, the service scope shall be clearly defined and reflect the activities of the site.	4.14.2	The site shall either contract the services of a competent pest management organisation or have appropriately trained staff for the regular inspection and treatment of the site to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and shall be documented. The risk assessment shall be reviewed whenever: ● there are changes to the building or production processes which could have an impact on the pest management programme ● there has been a significant pest issue. Where the services of a pest management contractor are employed, the service scope shall be clearly defined and reflect the activities of the site. Service provision regardless of the source shall meet with all applicable regulatory requirements.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.14.3	Where a site undertakes its own pest control, it shall be able to effectively demonstrate that: ● pest control operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site ● staff undertaking pest control activities meet any legal requirements for training or registration ● sufficient resources are available to respond to any infestation issues ● there is ready access to specialist technical knowledge when required ● legislation governing the use of pest control products is understood ● dedicated locked facilities are used for the storage of pesticides.	4.14.3	Where a site undertakes its own pest management, it shall be able to effectively demonstrate that: ● pest management operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site ● staff undertaking pest management activities meet any legal requirements for training or registration ● sufficient resources are available to respond to any infestation issues ● there is ready access to specialist technical knowledge when required ● legislation governing the use of pest control products is understood and complied with ● dedicated locked facilities are used for the storage of pesticides.	

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.14.4	Pest control documentation and records shall be maintained. This shall include as a minimum: ● an up-to-date plan of the full site, identifying numbered pest control device locations ● identification of the baits and/or monitoring devices on site ● clearly defined responsibilities for site management and for the contractor ● details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies ● any observed pest activity ● details of pest control treatments undertaken.	4.14.4	Pest management documentation and records shall be maintained. At a minimum, this shall include: ● an up-to-date plan of the full site, identifying pest control devices and their locations ● identification of the baits and/or monitoring devices on site ● clearly defined responsibilities for the site management and the contractor ● details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies ● any observed pest activity ● details of pest control treatments undertaken. Records may be on paper (hard copy) or controlled on an electronic system (e.g. an online reporting system).	Pest control devices must be identifiable and their locations known. Many regions complete this using numbered devices, each one being allocated to a specific location. This is an effective way of meeting the requirement, but other options are acceptable where they achieve the same aim (i.e. ensuring that all devices can be accounted for, and their correct locations are known). As with all documents (see 'Documented procedures' in the Introduction), hard copy (paper), electronic and online records are all acceptable.
4.14.5	Bait stations or other rodent control devices shall be appropriately located and maintained to prevent contamination risk to product. Toxic rodent baits shall not be used within production or storage areas where open product is present except when treating an active infestation. Where toxic baits are used these shall be secured. Any missing bait stations shall be recorded, reviewed and investigated.	4.14.5	Bait stations or other rodent monitoring or control devices shall be appropriately located and maintained to prevent contamination risk to product. Toxic rodent baits shall not be used within production or storage areas where open product is present except when treating an active infestation. Where toxic baits are used, these shall be secured. Any missing bait stations shall be recorded, reviewed and investigated.	

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CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.14.6	Fly-killing devices and/or pheromone traps shall be correctly sited and operational. If there is a danger of insects being expelled from a fly-killing extermination device and contaminating the product, alternative systems and equipment shall be used.	4.14.6	Insect-killing devices, pheromone traps and/or other insect monitoring devices shall be appropriately sited and operational. If there is a danger of insects being expelled from a fly-killing extermination device and contaminating the product, alternative systems and equipment shall be used.	
		4.14.7	The site shall have adequate measures in place to prevent birds from entering buildings or roosting above loading or unloading areas.	New requirement to ensure that consideration of bird pests is part of the pest management programme.
4.14.7	In the event of infestation, or evidence of pest activity, immediate action shall be taken to identify at-risk product and to minimise the risk of product contamination. Any potentially affected products should be subject to the non-conforming product procedure.	4.14.8	In the event of infestation, or evidence of pest activity, immediate action shall be taken to identify at-risk products and to minimise the risk of product contamination. Any potentially affected products should be subject to the non-conforming product procedure.	
4.14.8	Records of pest control inspections, pest proofing and hygiene recommendations and actions taken shall be maintained. It shall be the responsibility of the site to ensure that all of the relevant recommendations made by its contractor or in-house expert are carried out in a timely manner.	4.14.9	Records of pest management inspections, pest proofing and hygiene recommendations and actions taken shall be maintained. It shall be the responsibility of the site to ensure that all of the relevant recommendations made by its contractor or in-house expert are carried out in a timely manner.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.14.9	An in-depth, documented pest control survey shall be undertaken at a frequency based on risk, but as a minimum annually, by a pest control expert to review the pest control measures in place. The survey shall: ● provide an in-depth inspection of the facility for pest activity ● review the existing pest control measures in place and make any recommendations for change. The timing of the survey shall be such as to allow access to equipment for inspection where a risk of stored product insect infestation exists.	4.14.10	An in-depth, documented pest management survey shall be undertaken at a frequency based on risk, but at least annually, by a pest control expert to review the pest management measures in place. The survey shall: ● provide an in-depth inspection of the facility for pest activity ● review the existing pest management measures in place and make any recommendations for change. The survey shall be timed to allow access to equipment for inspection where a risk of stored product insect infestation exists.	
4.14.10	Results of pest control inspections shall be assessed and analysed for trends on a regular basis, but, as a minimum: ● in the event of an infestation ● annually. This shall include a catch analysis from trapping devices to identify problem areas. The analysis shall be used as a basis for improving the pest control procedures.	4.14.11	Results of pest management inspections shall be assessed and analysed for trends on a regular basis. At a minimum, results of inspections shall be analysed: ● annually or ● in the event of an infestation. The analysis shall include results from trapping and monitoring devices to identify problem areas. The analysis shall be used as a basis for improving the pest management procedures.	
4.14.11	Employees shall understand the signs of pest activity and be aware of the need to report any evidence of pest activity to a designated manager.	4.14.12	Employees shall understand the signs of pest activity and be aware of the need to report any evidence of pest activity to a designated manager.	

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4.15 STORAGE FACILITIES

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
All facilities used for the storage of raw materials, packaging, in-process products and finished products shall be suitable for its purpose.		All facilities used for the storage of raw materials, packaging, in-process products and finished products shall be suitable for purpose.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
4.15.1	Documented procedures to maintain product safety and quality during storage shall be developed on the basis of risk assessment, understood by relevant staff and implemented accordingly. These may include, as appropriate: ● managing chilled and frozen product transfer between temperature-controlled areas ● segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) or taint uptake ● storing materials off the floor and away from walls ● specific handling or stacking requirements to prevent product damage.	4.15.1	Procedures to maintain product safety and quality during storage shall be developed on the basis of risk assessment, understood by relevant staff and implemented accordingly. These may include, as appropriate: ● managing chilled and frozen product transfer between temperature-controlled areas ● segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) or taint uptake ● storing materials off the floor and away from walls ● specific handling or stacking requirements to prevent product damage.	
4.15.2	Where appropriate, packaging shall be stored away from other raw materials and finished product. Any part-used packaging materials suitable for use shall be effectively protected from contamination and clearly identified to maintain traceability before being returned to an appropriate storage area. Obsolete packaging shall be stored in a separate area and systems shall be in place to prevent accidental use.	4.15.2	Where appropriate, packaging shall be stored away from other raw materials and finished product. Any part-used packaging materials suitable for use shall be effectively protected from contamination and clearly identified to maintain traceability before being returned to an appropriate storage area.	The final sentence has been deleted, because a new clause (5.5.3) has been introduced to give further detail on the expectations surrounding the management of obsolete packaging.

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.15.3	Where temperature control is required, the storage area shall be capable of maintaining product temperature within specification and operated to ensure specified temperatures are maintained. Temperature recording equipment with suitable temperature alarms shall be fitted to all storage facilities or there shall be a system of recorded manual temperature checks, typically on at least a 4-hourly basis or at a frequency which allows for intervention before product temperatures exceed defined limits for the safety, legality or quality of products.	4.15.3	Where temperature control is required (e.g. for raw materials, semi-finished materials or final products), the storage area shall be capable of maintaining product temperature within specification and operated to ensure specified temperatures are maintained. Temperature recording equipment with suitable temperature alarms shall be fitted to all storage facilities or there shall be a system of recorded manual temperature checks, typically on at least a 4-hourly basis or at a frequency which allows for intervention before product temperatures exceed defined limits for the safety, legality or quality of products.	
4.15.4	Where controlled atmosphere storage is required, the storage conditions shall be specified and effectively controlled. Records shall be maintained of the storage conditions.	4.15.4	Where controlled atmosphere storage is required, the storage conditions shall be specified and effectively controlled. Records shall be maintained of the storage conditions.	
4.15.5	Where storage outside is necessary, items shall be protected from contamination and deterioration. Items shall be checked for suitability before being brought into the factory.	4.15.5	Where storage outside is necessary, items shall be protected from contamination and deterioration. Items shall be checked for suitability before being brought into the factory.	
4.15.6	The site shall facilitate correct stock rotation of raw materials, intermediate products and finished products in storage and ensure materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life.	4.15.6	The site shall facilitate correct stock rotation of raw materials, intermediate products and finished products in storage and ensure that materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life.	

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4.16 DISPATCH AND TRANSPORT

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Procedures shall be in place to ensure that the management of dispatch and of the vehicles and containers used for transporting products from the site do not present a risk to the safety, security or quality of the products.		Procedures shall be in place to ensure that the management of dispatch and of the vehicles and containers used for transporting products from the site do not present a risk to the safety, security or quality of the products.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.16.1	Documented procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include, as appropriate: ● controlling temperature of loading dock areas ● the use of covered bays for vehicle loading or unloading ● securing loads on pallets to prevent movement during transit ● inspection of loads prior to dispatch.	4.16.1	Procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include, as appropriate: ● controlling temperature of loading dock areas and vehicles ● the use of covered bays for vehicle loading or unloading ● securing loads on pallets to prevent movement during transit ● inspection of loads prior to dispatch.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.16.2	All vehicles or containers used for the dispatch of products shall be inspected prior to loading to ensure that they are fit for purpose. This shall ensure that they are: ● in a clean condition ● free from strong odours which may cause taint to products ● in a suitable condition to prevent damage to products during transit ● equipped to ensure any temperature requirements can be maintained. Records of inspections shall be maintained.	4.16.2	All vehicles or containers used for the transport of raw materials and the dispatch of products shall be fit for purpose. This shall ensure that they are: ● in a clean condition ● free from strong odours which may cause taint to products ● in a suitable condition to prevent damage to products during transit ● equipped to ensure any temperature requirements can be maintained throughout transportation. Records of inspections shall be maintained.	Vehicles used for the transport of raw materials also form an important aspect of transport control. All sites need to check raw-material vehicles (usually as part of the goods receipt process) to ensure that they are suitable and that there is no obvious source of contamination (such as spillages, pest activity or taints). However, this inspection will have an even greater relevance where the site is also responsible for the raw-material vehicles (e.g. fresh-produce pack houses that arrange transport from farm to pack house).
4.16.3	Where temperature control is required, the transport shall be capable of maintaining product temperature within specification, under minimum and maximum load. Temperature data-logging devices which can be interrogated to confirm time/ temperature conditions or a system to monitor and record at predetermined frequencies the correct operation of refrigeration equipment shall be used and records maintained.	4.16.3	Where temperature control is required, the transport shall be capable of maintaining product temperature within specification, under minimum and maximum load. Temperature data-logging devices which can be interrogated to confirm time/ temperature conditions or a system to monitor and record at predetermined frequencies the correct operation of refrigeration equipment shall be used and records maintained.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.16.4	Maintenance systems and documented cleaning procedures shall be available for all vehicles and equipment used for loading/unloading. There shall be records of the measures taken.	4.16.4	Maintenance systems and documented cleaning procedures shall be available for all vehicles and equipment used for loading/unloading. There shall be records of the measures taken.	
4.16.5	The company shall have documented procedures for the transport of products, which shall include: ● any restrictions on the use of mixed loads ● requirements for the security of products during transit, particularly when vehicles are parked and unattended ● clear instructions in the case of vehicle breakdown, accident or failure of refrigeration systems, which ensure the safety of the products is assessed and records maintained.	4.16.5	The company shall have procedures for the transport of products, which shall include: ● any restrictions on the use of mixed loads ● requirements for the security of products during transit, particularly when vehicles are parked and unattended ● clear instructions in the case of vehicle breakdown, accident or failure of refrigeration systems, which ensure that the safety of the products is assessed and records maintained.	
4.16.6	Where the company employs third-party contractors, all the requirements specified in this section shall be clearly defined in the contract and verified or the contracted company shall be certificated to the Global Standard for Storage and Distribution or similar GFSI-recognised scheme.	4.16.6	Where the company employs third-party contractors, all the requirements specified in this section shall be clearly defined in the contract or terms and conditions and verified, or the contracted company shall be certificated to the Global Standard for Storage and Distribution or similar GFSI-recognised scheme.	

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5 PRODUCT CONTROL

5.1 PRODUCT DESIGN/DEVELOPMENT

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Product design and development procedures shall be in place for new products or processes and any changes to product, packaging or manufacturing processes to ensure that safe and legal products are produced.		Product design and development procedures shall be in place for new products or processes and any changes to product, packaging or manufacturing processes to ensure that safe and legal products are produced.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
5.1.1	The company shall provide clear guidelines on any restrictions to the scope of new product developments to control the introduction of hazards which would be unacceptable to the site or customers (e.g. the introduction of allergens, glass packaging or microbiological risks).	5.1.1	The company shall provide clear guidelines on any restrictions to the scope of new product developments to control the introduction of hazards which would be unacceptable to the site or customers (e.g. the introduction of allergens, glass packaging or microbiological risks).	
5.1.2	All new products and changes to product formulation, packaging or methods of processing shall be formally approved by the HACCP team leader or authorised HACCP committee member. This shall ensure that hazards have been assessed and suitable controls, identified through the HACCP system, are implemented. This approval shall be granted before products are introduced into the factory environment.	5.1.2	All new products and changes to product formulation, packaging or methods of processing shall be formally approved by the HACCP team leader or authorised HACCP committee member. This shall ensure that hazards have been assessed and suitable controls, identified through the HACCP system, are implemented. This approval shall be granted before products are introduced into the factory environment.	
5.1.3	Trials using production equipment shall be carried out where it is necessary to validate that product formulation and manufacturing processes are capable of producing a safe product of the required quality.	5.1.3	Trials using production equipment shall be carried out where it is necessary to validate that product formulation and manufacturing processes are capable of producing a safe product of the required quality.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.1.4	Shelf-life trials shall be undertaken using documented protocols reflecting conditions experienced during storage, transport and handling. Results shall be recorded and retained and shall confirm compliance with relevant microbiological, chemical and organoleptic criteria. Where shelf-life trials prior to production are impractical, for instance for some long-life products, a documented science-based justification for the assigned shelf life shall be produced.	5.1.4	Initial shelf-life trials shall be undertaken using documented protocols that reflect conditions expected during manufacture, storage, transport/ distribution, use and handling to determine product shelf life. Results shall be recorded and retained and shall confirm compliance with the relevant microbiological, chemical and organoleptic criteria/ sensory analysis. Where shelf-life trials prior to production are impractical, for instance for some long-life products, a documented science-based justification for the assigned shelf life shall be produced.	

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5.2 PRODUCT LABELLING

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
Product labelling shall comply with the appropriate legal requirements and contain information to enable the safe handling, display, storage and preparation of the product within the food supply chain or by the customer.		Product labelling shall comply with the appropriate legal requirements and contain information to enable the safe handling, display, storage and preparation of the product within the food supply chain or by the customer.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
5.2.1	All products shall be labelled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer. There shall be a process to verify that ingredient and allergen labelling is correct based on the product recipe and ingredient specifications.	5.2.1	All products shall be labelled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer. There shall be a process to verify that ingredient and allergen labelling is correct based on the product recipe and ingredient specifications.	
5.2.2	There shall be effective processes in place to ensure that labelling information is reviewed whenever changes occur to: ● the product recipe ● raw materials ● the supplier of raw materials ● the country of origin of raw materials ● legislation.	5.2.2	There shall be effective processes in place to ensure that labelling information is reviewed whenever changes occur to: ● the product recipe ● raw materials ● the supplier of raw materials ● the country of origin of raw materials ● legislation.	
5.2.3	Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. a nutritional claim, reduced sugar), the company shall ensure that the product formulation and production process is fully validated to meet the stated claim.	5.2.3	Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. a nutritional claim, reduced sugar), the company shall ensure that the product formulation and production process are fully validated to meet the stated claim.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.2.4	Where the label information is the responsibility of a customer or a nominated third party the company shall provide: ● information to enable the label to be accurately created ● information whenever a change occurs which may affect the label information.	5.2.4	Where the label information is the responsibility of a customer or a nominated third party, the company shall provide information: ● to enable the label to be accurately created ● whenever a change occurs which may affect the label information.	
		5.2.5	Where cooking instructions are provided to ensure product safety, they shall be fully validated to ensure that, when the product is cooked according to the instructions, a safe, ready-to-eat product is consistently produced.	New requirement to ensure that customer cooking instructions are validated and will consistently produce a product which is safe to eat. The protocol for high-risk, high-care and ambient high-care areas (see Appendix 2 in the Standard) specifically refers to this clause in relation to products that require a full customer cook prior to consumption.

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5.3 MANAGEMENT OF ALLERGENS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
The site shall have a system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling in the country of sale.		The site shall have a system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling in the country of sale.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
5.3.1	The site shall carry out an assessment of raw materials to establish the presence and likelihood of contamination by allergens. This shall include review of raw material specifications and, where required, obtain additional information from suppliers, for example through questionnaires to understand the allergen status of the raw material, its ingredients and the factory in which it is produced.	5.3.1	The site shall carry out an assessment of raw materials to establish the presence and likelihood of contamination by allergens (see glossary). This shall include a review of the raw material specifications and, where required, the acquisition of additional information from suppliers (e.g. through questionnaires to understand the allergen status of the raw material, its ingredients and the factory in which it is produced).	
5.3.2	The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products, and any new product development ingredients or products.	5.3.2	The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products, and any new product development ingredients or products.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.3.3	A documented risk assessment shall be carried out to identify routes of contamination and establish documented policies and procedures for handling raw materials, intermediate and finished products to ensure cross-contamination is avoided. This shall include: ● consideration of the physical state of the allergenic material (i.e. powder, liquid, particulate) ● identification of potential points of cross-contamination through the process flow ● assessment of the risk of allergen cross-contamination at each process step ● identification of suitable controls to reduce or eliminate the risk of cross-contamination.	5.3.3	A documented risk assessment shall be carried out to identify routes of contamination and establish documented policies and procedures for handling raw materials and intermediate and finished products to ensure cross-contamination (cross-contact) is avoided. This assessment shall include: ● consideration of the physical state of the allergenic material (i.e. powder, liquid, particulate) ● identification of potential points of cross-contamination (cross-contact) through the process flow ● assessment of the risk of allergen cross-contamination (cross-contact) at each process step ● identification of suitable controls to reduce or eliminate the risk of cross-contamination (cross-contact).	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.3.4	Documented procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination into products not containing the allergen. This shall include as appropriate: ● physical or time segregation while allergen-containing materials are being stored, processed or packed ● the use of separate or additional protective overclothing when handling allergenic materials ● use of identified, dedicated equipment and utensils for processing ● scheduling of production to reduce changes between products containing an allergen and products not containing the allergen ● systems to restrict the movement of airborne dust containing allergenic material ● waste handling and spillage controls ● restrictions on food brought onto site by staff, visitors, contractors and for catering purposes.	5.3.4	Procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination (cross-contact) of products not containing the allergen. These shall include, as appropriate: ● physical or time segregation while allergen-containing materials are being stored, processed or packed ● the use of separate or additional protective overclothing when handling allergenic materials ● use of identified, dedicated equipment and utensils for processing ● scheduling of production to reduce changes between products containing an allergen and products not containing the allergen ● systems to restrict the movement of airborne dust containing allergenic material ● waste handling and spillage controls ● restrictions on food brought onto site by staff, visitors and contractors and for catering purposes.	

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5.3.5	Where rework is used, or reworking operations are carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen.	5.3.5	Where rework is used, or reworking operations are carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.3.6	Where the nature of the production process is such that cross-contamination from an allergen cannot be prevented, a warning should be included on the label. National guidelines or codes of practice shall be used when making such a warning statement.	5.3.6	Where a justified, risk-based assessment demonstrates that the nature of the production process is such that cross-contamination (cross-contact) from an allergen cannot be prevented, a warning should be included on the label. National guidelines or codes of practice shall be used when making such a warning statement.	Allergen warnings should be used only when there is a justified reason. Allergen cross-contamination (cross-contact) warning labels (e.g. may contain allergen X) should not be used to avoid good production processes that minimise the risk of cross-contamination (cross-contact).
5.3.7	Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers, the site shall ensure that the production process is fully validated to meet the stated claim and the effectiveness of the process is routinely verified. This shall be documented.	5.3.7	Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers, the site shall ensure that the production process is fully validated to meet the stated claim and the effectiveness of the process is routinely verified. This shall be documented.	
5.3.8	Equipment or area cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination by allergens. The cleaning methods shall be validated to ensure they are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use.	5.3.8	Equipment or area-cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination (cross-contact) by allergens. The cleaning methods shall be validated to ensure that they are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use.	

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5.4 PRODUCT AUTHENTICITY, CLAIMS AND CHAIN OF CUSTODY

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated food raw materials and to ensure that all product descriptions and claims are legal, accurate and verified.		Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated food raw materials and to ensure that all product descriptions and claims are legal, accurate and verified.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
5.4.1	The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of raw materials. Such information may come from: ● trade associations ● government sources ● private resource centres.	5.4.1	The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of raw materials (i.e. fraudulent raw materials). Such information may come from, for example: ● trade associations ● government sources ● private resource centres.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.4.2	A documented vulnerability assessment shall be carried out on all food raw materials or groups of raw materials to assess the potential risk of adulteration or substitution. This shall take into account: ● historical evidence of substitution or adulteration ● economic factors which may make adulteration or substitution more attractive ● ease of access to raw materials through the supply chain ● sophistication of routine testing to identify adulterants ● nature of the raw material. The vulnerability assessment shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risk. It shall be formally reviewed annually.	5.4.2	A documented vulnerability assessment shall be carried out on all food raw materials or groups of raw materials to assess the potential risk of adulteration or substitution. This shall take into account: ● historical evidence of substitution or adulteration ● economic factors which may make adulteration or substitution more attractive ● ease of access to raw materials through the supply chain ● sophistication of routine testing to identify adulterants ● the nature of the raw material. The output from this assessment shall be a documented vulnerability assessment plan. This plan shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risks. It shall be formally reviewed annually.	The key output from the vulnerability risk assessment is a documented vulnerability assessment plan, which is kept up to date to reflect any changes in the risk to raw materials. This plan will also include details of any controls or actions taken, where a raw material is identified as being at risk (see Issue 8, clause 5.4.3).
5.4.3	Where raw materials are identified as being at particular risk of adulteration or substitution appropriate assurance and/or testing processes shall be in place to reduce the risk.	5.4.3	Where raw materials are identified as being at particular risk of adulteration or substitution, the vulnerability assessment plan shall include appropriate assurance and/or testing processes to mitigate the identified risks.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.4.4	Where products are labelled or claims are made on finished packs which are dependent on a status of a raw material including: ● specific provenance or origin ● breed/varietal claims ● assured status (e.g. GlobalGAP) ● genetically modified organism (GMO) status ● identity preserved ● named specific trademarked ingredients the status of each batch of the raw material shall be verified. The facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims. The site shall undertake documented mass balance tests at a frequency to meet the particular scheme requirements or at least every 6 months in the absence of a scheme-specific requirement.	5.4.4	Where products are labelled or claims are made on finished packs which are dependent on the status of a raw material, the status of each batch of the raw material shall be verified. These claims include: ● specific provenance or origin ● breed/varietal claims ● assured status (e.g. GlobalG.A.P.) ● genetically modified organism (GMO) status ● identity preserved ● named specific trademarked ingredients. The facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims. The site shall undertake documented mass balance tests at a frequency to meet the particular scheme requirements or at least every 6 months in the absence of a scheme-specific requirement.	
5.4.5	Where claims are made about the methods of production (e.g. organic, Halal, Kosher) the site shall maintain the necessary certification status in order to make such a claim.	5.4.5	Where claims are made about the methods of production (e.g. organic, halal, kosher) the site shall maintain the necessary certification status in order to make such a claim.	

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5.4.6		The process flow for the production of products where claims are made shall be documented and potential areas for contamination or loss of identity identified. Appropriate controls shall be established to ensure the integrity of the product claims.	5.4.6	The process flow for the production of products where claims are made shall be documented and potential areas for contamination or loss of identity identified. Appropriate controls shall be established to ensure the integrity of the product claims.	

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5.5 PRODUCT PACKAGING

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
Product packaging shall be appropriate for the intended use and shall be stored under conditions to prevent contamination and minimise deterioration.		Product packaging shall be appropriate for the intended use and shall be stored under conditions to prevent contamination and minimise deterioration.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
5.5.1	When purchasing or specifying food contact packaging the supplier of packaging materials shall be made aware of any particular characteristics of the food (e.g. high fat content, pH or usage conditions such as microwaving) which may affect packaging suitability. Certificates of conformity or other evidence shall be available for product packaging to confirm it complies with relevant food safety legislation and is suitable for its intended use.	5.5.1	When purchasing or specifying primary packaging, the supplier of packaging materials shall be made aware of any particular characteristics of the food (e.g. high fat content, pH, usage conditions such as microwaving, other packaging used on the product) which may affect packaging suitability. Certificates of conformity or other evidence shall be available for primary packaging to confirm it complies with applicable food safety legislation and is suitable for its intended use.	Reference to food contact has been removed and replaced with a reference to primary packaging. There are numerous examples of migration from packaging other than food contact (e.g. from inks used on external labels). It is therefore important that the site considers the potential risk from all primary packaging, and addresses this in consultation with its packaging supplier(s).
5.5.2	Product liners and bags purchased by the company for use in direct contact with ingredients, or work in process, shall be appropriately coloured and resistant to tearing to prevent accidental contamination.	5.5.2	Product liners and bags purchased by the company for use in direct contact with ingredients, or work in process, shall be appropriately coloured (e.g. contrasting colour to the product) and resistant to tearing to prevent accidental contamination.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		5.5.3	The company shall have a procedure to manage obsolete packaging (including labels). This shall include: ● mechanisms to prevent accidental use of obsolete packaging ● control and disposal of obsolete packaging ● appropriate procedures for the disposal of obsolete printed materials (e.g. rendering trademarked materials unusable).	New requirement to ensure that processes are in place to prevent obsolete packaging being used inadvertently.

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5.6 PRODUCT INSPECTION AND LABORATORY TESTING

ISSUE 7	ISSUE 8	COMMENTS
STATEMENT OF INTENT	STATEMENT OF INTENT	
The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, legality and quality, using appropriate procedures, facilities and standards.	The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, legality, integrity and quality, using appropriate procedures, facilities and standards.	'Integrity' has been added to the statement of intent as testing may form part of a vulnerability assessment plan and the site would therefore need to ensure the reliability of such tests.

5.6.1 PRODUCT INSPECTION AND TESTING

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.6.1.1	There shall be a scheduled programme of testing covering products and the processing environment, which may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, frequency and specified limits shall be documented.	5.6.1.1	There shall be a scheduled programme of product testing which may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, frequency and specified limits shall be documented.	'Processing environment' has been removed, as this is now covered separately in Issue 8, section 4.11.8.
5.6.1.2	Test and inspection results shall be recorded and reviewed regularly to identify trends. The significance of external laboratory results shall be understood and acted upon accordingly. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.	5.6.1.2	Test and inspection results shall be recorded and reviewed regularly to identify trends. The significance of external laboratory results shall be understood and acted upon accordingly. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
5.6.1.3	The site shall ensure that a system of ongoing shelf-life assessment is in place. This shall be based on risk and shall include sensory analysis and, as applicable, microbiological testing and relevant chemical factors such as pH and a_w. Records and results from shelf-life tests shall verify the shelf-life period indicated on the product.	5.6.1.3	The site shall ensure that a system of validation and ongoing verification of the shelf life is in place. This shall be based on risk and shall include sensory analysis and, as applicable, microbiological testing and relevant chemical factors such as pH and a_w. Records and results from shelf-life tests shall verify the shelf-life period indicated on the product.	Rephrased to provide clarity and to distinguish this requirement from the shelf-life assessments completed in Issue 8, clause 5.1.4.

5.6.2 LABORATORY TESTING

ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
5.6.2.1	Pathogen testing shall be subcontracted to an external laboratory or, where conducted internally, the laboratory facility shall be fully segregated from the production and storage areas and have operating procedures to prevent any risk of product contamination.	5.6.2.1	Pathogen testing (including pathogens tested as part of the environmental testing) shall be subcontracted to an external laboratory or, where conducted internally, the laboratory facility shall be fully segregated from the production and storage areas and have operating procedures to prevent any risk of product contamination.	Reference to environmental testing added, as Issue 8, section 4.11.8 requires environmental testing to be completed, and similar controls are needed for these tests as for other product tests.

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
5.6.2.2	Where routine testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. Controls shall be documented, implemented and shall include consideration of: ● design and operation of drainage and ventilation systems ● access and security of the facility ● movement of laboratory personnel ● protective clothing arrangements ● processes for obtaining product samples ● disposal of laboratory waste.	5.6.2.2	Where routine testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. Controls shall be documented, implemented and include consideration of: ● design and operation of drainage and ventilation systems ● access and security of the facility ● movement of laboratory personnel ● protective clothing arrangements ● processes for obtaining product samples ● disposal of laboratory waste.	
5.6.2.3	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO/IEC 17025. Documented justification shall be available where accredited methods are not undertaken.	5.6.2.3	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO/IEC 17025. Documented justification shall be available where accredited methods are not undertaken.	

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
5.6.2.4	Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in clause 5.6.2.3. These shall include: ● use of recognised test methods, where available ● documented testing procedures ● ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required ● use of a system to verify the accuracy of test results (e.g. ring or proficiency testing) ● use of appropriately calibrated and maintained equipment.	5.6.2.4	Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in clause 5.6.2.3. These shall include: ● use of recognised test methods, where available ● documented testing procedures ● ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required ● use of a system to verify the accuracy of test results (e.g. ring or proficiency testing) ● use of appropriately calibrated and maintained equipment.	
		5.6.2.5	The significance of laboratory results shall be understood and acted upon accordingly. Appropriate action shall be taken promptly to address any unsatisfactory results or trends. Where legal limits apply, these shall be understood and appropriate action taken promptly to address any exceedance of these limits.	New requirement – it is important to ensure that the results of laboratory tests are reviewed by staff who understand the significance of the results and can, if necessary, implement action in a timely manner.

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5.7 PRODUCT RELEASE

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
The site shall ensure that finished product is not released unless all agreed procedures have been followed.		The site shall ensure that finished product is not released unless all agreed procedures have been followed.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
5.7.1	Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and release authorised.	5.7.1	Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and the release has been authorised.	

5.8 PET FOOD

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
		The site shall ensure that pet food products are safe and fit for intended use.		New section for pet food manufacturers to ensure that Issue 8 aligns with good practice and the new GFSI benchmark for pet food.
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
		5.8.1	The site shall ensure pet food is formulated/ designed for the intended use (e.g. where products are designed for complete diet or as a complementary product).	To ensure the formulation is appropriate for its intended use. This requirement is for pet food manufacturers who make pet food for more than one species of animal and therefore need additional ingredient controls.
		5.8.2	Where a site's product range includes pet food products for different animal species, the site shall have specific procedures for the management of any ingredients, raw materials, products or rework that could be harmful to unintended recipients.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		5.8.3	Where the site manufactures, processes or packs pet food products that contain medicinal substances, the site shall have specific procedures for the management of the medicated raw materials and finished products. At a minimum, these procedures shall include: ● identification of medication-containing materials handled on site. These can be raw materials, processing aids, intermediate and finished products, rework or any new product or product development ingredients ● mechanisms to ensure the correct concentrations of medicinal substances in finished products ● procedures (e.g. cleaning procedures) to prevent contamination of non-medicated pet food with materials containing medicinal substances ● specific procedures to ensure the correct labelling of medicated pet food.	This requirement is for pet food manufacturers who make pet food that contains medicated substances and therefore need specific controls of the medicated substance(s).

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6 PROCESS CONTROL

6.1 CONTROL OF OPERATIONS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The site shall operate to documented procedures and/or work instructions that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan.		The site shall operate to procedures and/or work instructions that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP food safety plan.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
6.1.1	Documented process specifications and work instructions shall be available for the key processes in the production of products to ensure product safety, legality and quality. The specifications as appropriate shall include: ● recipes – including identification of any allergens ● mixing instructions, speed, time ● equipment process settings ● cooking times and temperatures ● cooling times and temperatures ● labelling instructions ● coding and shelf-life marking ● any additional critical control points identified in the HACCP plan. Process specifications shall be in accordance with the agreed finished product specification.	6.1.1	Documented process specifications and work instructions/procedures shall be available for the key processes in the production of products to ensure product safety, legality and quality. The specifications/procedures as appropriate shall include: ● recipes – including identification of any allergens ● mixing instructions, speed, time ● equipment process settings ● cooking times and temperatures ● cooling times and temperatures ● labelling instructions ● coding and shelf-life marking ● any additional critical control points identified in the HACCP or food safety plan. Process specifications shall be in accordance with the agreed finished product specification.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		6.1.2	Where equipment settings are critical to the safety or legality of the product, changes to the equipment settings shall only be completed by trained and authorised staff. Where applicable, controls shall be password-protected or otherwise restricted.	New clause to address the fact that in several areas (e.g. metal detection and verification equipment) controls are required to make changes to the equipment settings.
6.1.2	Process monitoring, such as of temperature, time, pressure and chemical properties, shall be implemented, adequately controlled and recorded to ensure that product is produced within the required process specification.	6.1.3	Process monitoring, such as of temperature, time, pressure and chemical properties, shall be implemented, adequately controlled and recorded to ensure that product is produced within the required process specification.	
6.1.3	In circumstances where process parameters or product quality are controlled by in-line monitoring devices, these shall be linked to a suitable failure alert system that is routinely tested.	6.1.4	In circumstances where process parameters or product quality are controlled by in-line monitoring devices, these shall be linked to a suitable failure alert system that is routinely tested.	
6.1.4 6.1.5	Where variation in processing conditions may occur within equipment critical to the safety or quality of products, the processing characteristics shall be validated and verified at a frequency based on risk and performance of equipment (e.g. heat distribution in retorts, ovens and processing vessels; temperature distribution in freezers and cold stores). In the case of equipment failure or deviation of the process from specification, procedures shall be in place to establish the safety status and quality of the product to determine the action to be taken.	6.1.5 6.1.6	Where variation in processing conditions may occur within equipment critical to the safety or quality of products, the processing characteristics shall be validated and verified at a frequency based on risk and performance of equipment (e.g. heat distribution in retorts, ovens and processing vessels; temperature distribution in freezers and cold stores). In the case of equipment failure or deviation of the process from specification, procedures shall be in place to establish the safety status and quality of the product to determine the action to be taken.	

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6.2 LABELLING AND PACKCONTROL

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The management controls of product labelling activities shall ensure that products will be correctly labelled and coded.		The management controls of product labelling activities shall ensure that products will be correctly labelled and coded.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
6.2.1	There shall be a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packaging machines. Where off-line coding or printing of packaging materials occurs, checks shall be in place that only correctly printed material is available at the packaging machines.	6.2.1	There shall be a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packing machines. Where offline coding or printing of packaging materials occurs: ● setting and amendments to the printer parameters (e.g. the input of, or changes to, date codes) shall only be completed by an authorised member of staff ● controls shall be in place to ensure that only correctly printed material is available at the packing machines.	
6.2.2	Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleared and are ready for production. Documented checks shall be carried out at product changes to ensure all products and packaging from the previous production have been removed from the line before changing to the next production.	6.2.2	Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleared and are ready for production. Documented checks shall be carried out at product changes to ensure that all products and packaging from the previous production have been removed from the line before changing to the next production.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
6.2.3	Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labelled. These shall include checks: ● at the start of packing ● during the packing run ● when changing batches of packaging materials ● at the end of each production run. The checks shall also include verification of any printing carried out at the packing stage including, as appropriate: ● date coding ● batch coding ● quantity indication ● pricing information ● bar coding ● country of origin.	6.2.3	Procedures shall be in place to ensure that all products are packed into the correct packaging and correctly labelled. These shall include checks: ● at the start of packing ● during the packing run ● when changing batches of packaging materials ● at the end of each production run. The checks shall also include verification of any printing carried out at the packing stage including, as appropriate: ● date coding ● batch coding ● quantity indication ● pricing information ● bar coding ● country of origin ● allergen information.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
6.2.4	Where on-line vision equipment is used to check product labels and printing, procedures shall be in place to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification.	6.2.4	Where online verification equipment (e.g. bar code scanners) is used to check product labels and printing, the site shall establish and implement procedures for the operation and testing of the equipment to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification. At a minimum, testing of the equipment shall be completed at: ● the start of the packing run ● the end of the packing run ● a frequency based on the site's ability to identify, hold and prevent the release of any implicated materials should the equipment fail (e.g. during the packing run or when changing batches of packaging materials). The site shall establish and implement procedures in the event of a failure in the online verification equipment (e.g. a documented and trained manual checking procedure).	Requirement rephrased to provide clarity on good practice and the expectations of the Standard.

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6.3 QUANTITY - WEIGHT, VOLUME AND NUMBER CONTROL

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
The site shall operate a quantity control system which conforms to legal requirements in the country where the product is sold and any additional industry sector codes or specified customer requirements.		The site shall operate a quantity control system which conforms to legal requirements in the country where the product is sold and any additional industry sector codes or specified customer requirements.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
6.3.1	The frequency and methodology of quantity checking shall meet the requirements of appropriate legislation governing quantity verification, and records of checks shall be retained.	6.3.1	The frequency and methodology of quantity checking shall meet the requirements of the appropriate legislation governing quantity verification, and records of checks shall be retained.	
6.3.2	Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product must conform to customer requirements and records shall be maintained.	6.3.2	Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product must conform to customer requirements and records shall be maintained.	
		6.3.3	Where used, the site shall establish procedures for the operation and testing of online check weighers. At a minimum, this shall include: ● consideration of any legal requirements ● responsibilities for testing the equipment ● operating effectiveness and any variations for particular products ● methods and frequency of testing the check weighers ● records of the test results.	New requirement for the management of check weighers.

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6.4 CALIBRATION AND CONTROL OF MEASURING AND MONITORING DEVICES

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The site shall be able to demonstrate that measuring equipment is sufficiently accurate and reliable to provide confidence in measurement results.		The site shall be able to demonstrate that measuring equipment is sufficiently accurate and reliable to provide confidence in measurement results.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
6.4.1	The site shall identify and control measuring equipment used to monitor critical control points, product safety and legality. This shall include as a minimum: ● a documented list of equipment and its location ● an identification code and calibration due date ● prevention from adjustment by unauthorised staff ● protection from damage, deterioration or misuse.	6.4.1	The site shall identify and control measuring equipment used to monitor critical control points and product safety, legality and quality. This shall include, at a minimum: ● a documented list of equipment and its location ● an identification code and calibration due date ● prevention from adjustment by unauthorised staff ● protection from damage, deterioration or misuse.	
6.4.2	All identified measuring devices, including new equipment, shall be checked and where necessary adjusted: ● at a predetermined frequency, based on risk assessment ● to a defined method traceable to a recognised national or international standard where possible. Results shall be documented. Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform.	6.4.2	All identified measuring devices, including new equipment, shall be checked and, where necessary, adjusted: ● at a predetermined frequency, based on risk assessment ● to a defined method traceable to a recognised national or international standard where possible. Results shall be documented. Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
6.4.3	Reference measuring equipment shall be calibrated and traceable to a recognised national or international standard and records maintained. The uncertainty of calibration shall be considered when equipment is used to assess critical limits.	6.4.3	Reference measuring equipment shall be calibrated and traceable to a recognised national or international standard and records maintained. The uncertainty of calibration shall be considered when equipment is used to assess critical limits.	
6.4.4	Procedures shall be in place to record actions to be taken when the prescribed measuring devices are found not to be operating within specified limits. Where the safety or legality of products is based on equipment found to be inaccurate, action shall be taken to ensure at-risk product is not offered for sale.	6.4.4	Procedures shall be in place to record actions to be taken when the prescribed measuring devices are found not to be operating within specified limits. Where the safety or legality of products is based on equipment found to be inaccurate, action shall be taken to ensure at-risk product is not offered for sale.	

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7 PERSONNEL

7.1 TRAINING: RAW MATERIAL HANDLING, PREPARATION, PROCESSING, PACKING AND STORAGE AREAS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification.		The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
7.1.1	All relevant personnel, including agency-supplied staff, temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.	7.1.1	All relevant personnel, including agency-supplied staff, temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.	
7.1.2	Where personnel are engaged in activities relating to critical control points, relevant training and competency assessment shall be in place.	7.1.2	Where personnel are engaged in activities relating to critical control points, relevant training and competency assessment shall be in place.	
7.1.3	The site shall put in place documented programmes covering the training needs of relevant personnel. These shall include as a minimum: ● identifying the necessary competencies for specific roles ● providing training or other action to ensure staff have the necessary competencies ● reviewing the effectiveness of training ● the delivery of training in the appropriate language of trainees.	7.1.3	The site shall put in place documented programmes covering the training needs of relevant personnel. These shall include, at a minimum: ● identifying the necessary competencies for specific roles ● providing training or other action to ensure staff have the necessary competencies ● reviewing the effectiveness of training ● delivery of training in the appropriate language of trainees.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
7.1.4	All relevant personnel, including engineers, agency-supplied staff and temporary staff and contractors, shall have received general allergen awareness training and be trained in the site's allergen-handling procedures.	7.1.4	All relevant personnel, including engineers, agency-supplied staff, temporary staff and contractors, shall have received general allergen awareness training and be trained in the site's allergen-handling procedures.	
		7.1.5	All relevant personnel (including relevant agency-supplied staff, temporary staff and contractors) shall have received training on the site's labelling and packing processes which are designed to ensure the correct labelling and packing of products.	New requirement highlighting the need for sites to ensure that staff involved with labelling and packing processes have received appropriate training.
7.1.5	Records of all training shall be available. This shall include as a minimum: ● the name of the trainee and confirmation of attendance ● the date and duration of the training ● the title or course contents, as appropriate ● the training provider. Where training is undertaken by agencies on behalf of the company, records of the training shall be available.	7.1.6	Records of all training shall be available. These shall include, at a minimum: ● the name of the trainee and confirmation of attendance ● the date and duration of the training ● the title or course contents, as appropriate ● the training provider ● for internal courses, a reference to the material, work instruction or procedure that is used in the training. Where training is undertaken by agencies on behalf of the company, records of the training shall be available.	A new bullet point has been added so that when internal training is completed, there should be reference to the work instruction or procedure. This is an important aid to change control (i.e. when the procedure is updated or changes, it becomes immediately apparent who will need to be re-trained in the new content).
7.1.6	The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.	7.1.7	The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.	

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7.2 PERSONAL HYGIENE: RAW MATERIAL HANDLING, PREPARATION, PROCESSING, PACKING AND STORAGE AREAS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		**STATEMENT OF INTENT**		**COMMENTS**
The site's personal hygiene standards shall be developed to minimise the risk of product contamination from personnel, be appropriate to the products produced and be adopted by all personnel, including agency-supplied staff, contractors and visitors to the production facility.		The site's personal hygiene standards shall be developed to minimise the risk of product contamination from personnel, be appropriate to the products produced and be adopted by all personnel, including agency-supplied staff, contractors and visitors to the production facility.		
CLAUSE	**REQUIREMENTS**	**CLAUSE**	**REQUIREMENTS**	
7.2.1	The requirements for personal hygiene shall be documented and communicated to all personnel. This shall include as a minimum the following requirements: ● watches shall not be worn ● jewellery shall not be worn, with the exception of a plain wedding ring or wedding wristband ● rings and studs in exposed parts of the body, such as ears, noses, tongues and eyebrows, shall not be worn ● fingernails shall be kept short, clean and unvarnished ● false fingernails and nail art shall not be permitted ● excessive perfume or aftershave shall not be worn. Compliance with the requirements shall be checked routinely.	7.2.1	The requirements for personal hygiene shall be documented and communicated to all personnel. These shall include, at a minimum, the following: ● watches shall not be worn ● jewellery shall not be worn, with the exception of a plain wedding ring, wedding wristband or medical alert jewellery ● rings and studs in exposed parts of the body, such as ears, noses and eyebrows, shall not be worn ● fingernails shall be kept short, clean and unvarnished ● false fingernails and nail art shall not be permitted ● excessive perfume or aftershave shall not be worn. Compliance with the requirements shall be checked routinely.	
7.2.2	Hand-washing shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.	7.2.2	Hand-washing shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
7.2.3	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue) and contains a metal detectable strip. These shall be site issued and monitored. Where appropriate, in addition to the plaster, a glove shall be worn.	7.2.3	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue) and contains a metal detectable strip. These shall be site-issued and monitored. Where appropriate, in addition to the plaster, a glove shall be worn.	
7.2.4	Where metal detection equipment is used, a sample from each batch of plasters shall be successfully tested through the equipment and records shall be kept.	7.2.4	Where metal detection equipment is used, a sample from each batch of plasters shall be successfully tested through the equipment and records shall be kept.	
7.2.5	Processes and written instructions for staff shall be in place to control the use and storage of personal medicines, so as to minimise the risk of product contamination.	7.2.5	Processes and written instructions for staff shall be in place to control the use and storage of personal medicines, so as to minimise the risk of product contamination.	

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7.3 MEDICAL SCREENING

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
The company shall have procedures in place to ensure that employees, agency staff, contractors or visitors are not a source of transmission of food-borne diseases to products.		The company shall have procedures in place to ensure that employees, agency staff, contractors or visitors are not a source of transmission of food-borne diseases to products.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
7.3.1	The site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working with open food. The site shall have a procedure which enables notification by employees, including temporary employees, of any relevant symptoms, infection, disease or condition with which they may have been in contact or be suffering from.	7.3.1	The site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working with open food. The site shall have a procedure which enables notification by employees, including temporary employees, of any relevant symptoms, infection, disease or condition with which they may have been in contact or be suffering from.	
7.3.2	Where there may be a risk to product safety, visitors and contractors shall be made aware of the types of symptoms, infection, disease or condition which would prevent a person visiting areas with open food. Where permitted by law, visitors shall be required to complete a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to entering the raw material, preparation, processing, packing and storage areas.	7.3.2	Where there may be a risk to product safety, visitors and contractors shall be made aware of the types of symptoms, infection, disease or condition which would prevent a person visiting areas with open food. Where permitted by law, visitors shall be required to complete a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to entering the raw material, preparation, processing, packing and storage areas.	

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7.3.3	There shall be documented procedures for employees, contractors and visitors relating to action to be taken where they may be suffering from or have been in contact with an infectious disease. Expert medical advice shall be sought where required.	7.3.3	There shall be procedures for employees, contractors and visitors relating to action to be taken where they may be suffering from or have been in contact with an infectious disease. Expert medical advice shall be sought where required.	

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7.4 PROTECTIVE CLOTHING: EMPLOYEES OR VISITORS TO PRODUCTION AREAS

ISSUE 7		ISSUE 8		
STATEMENT OF INTENT		STATEMENT OF INTENT		COMMENTS
Suitable site-issued protective clothing shall be worn by employees, contractors or visitors working in or entering production areas.		Suitable site-issued protective clothing shall be worn by employees, contractors or visitors working in or entering production areas.		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
7.4.1	The company shall document and communicate to all employees (including agency and temporary personnel), contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. high-care or high-risk areas). This shall also include policies relating to the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, use of canteen and smoking areas).	7.4.1	The company shall document and communicate to all employees (including agency and temporary personnel), contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. production areas, storage areas etc.). This shall also include policies relating to the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, and use of canteen and smoking areas).	Reference to high-risk and high-care areas removed. To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements.
7.4.2	Protective clothing shall be available that: ● is provided in sufficient numbers for each employee ● is of suitable design to prevent contamination of the product (as a minimum containing no external pockets above the waist or sewn-on buttons) ● fully contains all scalp hair to prevent product contamination ● includes snoods for beards and moustaches, where required, to prevent product contamination.	7.4.2	Protective clothing shall be available that: ● is provided in sufficient numbers for each employee ● is of suitable design to prevent contamination of the product (at a minimum containing no external pockets above the waist or sewn-on buttons) ● fully contains all scalp hair to prevent product contamination ● includes snoods for beards and moustaches, where required, to prevent product contamination.	

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
7.4.3	Laundering of protective clothing shall take place by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure: ● adequate segregation between dirty and cleaned clothes ● effective cleaning of the protective clothing ● protective clothing for high-risk or high-care areas is commercially sterile following the washing and drying process ● cleaned clothes are supplied protected from contamination until use (e.g. by the use of covers or bags). Washing of protective clothing by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.	7.4.3	Laundering of protective clothing shall take place by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure: ● adequate segregation between dirty and cleaned clothes ● effective cleaning of the protective clothing ● cleaned clothes are supplied protected from contamination until use (e.g. by the use of covers or bags). Washing of protective clothing by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.	Reference to high-risk and high-care areas removed. To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.7.1.
7.4.4	Where protective clothing for high-care or high-risk areas is cleaned by a contracted or in-house laundry, this shall be audited either directly or by a third party. The frequency of these audits should be based on risk.			To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.7.2.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
7.4.5	Protective clothing shall be changed at an appropriate frequency, based on risk. For high-risk and high-care areas the protective clothing shall be changed at least daily.	7.4.4	Protective clothing shall be changed at an appropriate frequency, based on risk.	Reference to high-risk and high-care areas removed. To assist sites with the application of controls for products requiring high-risk, high-care and ambient high-care processing environments, Issue 8 contains a new section (section 8) which collates all of these requirements. See Issue 8, clause 8.7.3.
7.4.6	If gloves are used, they shall be replaced regularly. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive colour (blue where possible), be intact and not shed loose fibres.	7.4.5	If gloves are used, they shall be replaced regularly. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive colour (blue where possible), be intact and not shed loose fibres.	
7.4.7	Where items of personal protective clothing that are not suitable for laundering are provided (such as chain mail, gloves and aprons), these shall be cleaned and sanitised at a frequency based on risk.	7.4.6	Where items of personal protective clothing that are not suitable for laundering are provided (such as chain mail, gloves and aprons), these shall be cleaned and sanitised at a frequency based on risk.	

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8 HIGH-RISK, HIGH-CARE AND AMBIENT HIGH-CARE PRODUCTION RISK ZONES (NEW)

Please note that for the purposesof this document we have repeated the high-risk, high-care and ambient high-care clauses that were located in different sectionsof Issue 7 for easy comparison with the wording for Issue 8.

Where a site produces products that require handling in high-risk, high-care and/or ambient high-care production facilities (see Appendix 2 in the Standard for the definition of products that require these facilities), all the relevant requirements from sections 1–7 of the Standard must be fulfilled in addition to the requirements in this section.

8.1 LAYOUT, PRODUCT FLOW AND SEGREGATION IN HIGH-RISK, HIGH-CARE AND AMBIENT HIGH-CARE ZONES

ISSUE 7		ISSUE 8		COMMENTS
STATEMENT OF INTENT		STATEMENT OF INTENT		
		The site shall be able to demonstrate that production facilities and controls are suitable to prevent pathogen contamination of products.		New statement of intent for section 8.
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
4.3.1	There shall be a map of the site which designates areas (zones) where product is at different levels of risk from contamination; that is: ● high-risk areas ● high-care areas ● ambient high-care areas ● low-risk areas ● enclosed product areas ● non-product areas. See Appendix 2 for guidelines on defining the production risk zones. This zoning shall be taken into account when determining the prerequisite programmes for the particular areas of the site.	8.1.1	The map of the site (see clause 4.3.1) shall include areas (zones) where the product is at different levels of risk from contamination. The map shall show: ● high-risk areas ● high-care areas ● ambient high-care areas ● low-risk areas ● enclosed product areas ● non-product areas. See Appendix 2 for guidelines on defining the production risk zones. This zoning shall be taken into account when determining the prerequisite programmes for the particular areas of the site.	Relocated from Issue 7, clause 4.3.1. Reference to Appendix 2 is to the appendix in the Standard (not reproduced here).

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.3.5	Where high-risk areas are part of the manufacturing site, there shall be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials (including packaging), equipment, personnel, waste, airflow, air quality and utilities provision (including drains). The location of transfer points shall not compromise the segregation between high-risk areas and other areas of the factory. Practices shall be in place to minimise risk of product contamination (e.g. the disinfection of materials on entry).	8.1.2	Where high-risk areas are part of the manufacturing site, there shall be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, the nature of the materials (including packaging), the equipment, the personnel, the disposal of waste, the flow of air, the air quality, and the provision of utilities (including drains). The location of transfer points shall not compromise the segregation between high-risk areas and other areas of the factory. Practices shall be in place to minimise the risk of product contamination (e.g. the disinfection of materials on entry).	Relocated from Issue 7, clause 4.3.5.
4.3.6	Where high-care areas are part of the manufacturing site there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials (including packaging), equipment, personnel, waste, airflow, air quality and utilities provision (including drains). Where physical barriers are not in place, the site shall have undertaken a documented risk assessment of the potential for cross-contamination, and effective, validated processes shall be in place to protect products from contamination.	8.1.3	Where high-care areas are part of the manufacturing site, there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, the nature of materials (including packaging), the equipment, the personnel, the disposal of waste, the flow of air, the air quality, and the provision of utilities (including drains). Where physical barriers are not in place, the site shall have undertaken a documented risk assessment of the potential for cross-contamination, and effective, validated processes shall be in place to protect products from contamination.	Relocated from Issue 7, clause 4.3.6.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.3.7	Where ambient high-care areas are required a documented risk assessment shall be completed to determine the risk of cross-contamination with pathogens. The risk assessment shall take into account the potential sources of microbiological contamination and include: ● the raw materials and products ● flow of raw materials, packaging, products, equipment, personnel and waste ● airflow and air quality ● utilities (including drains). Effective processes shall be in place to protect the final product from this contamination. These processes may include segregation, management of process flow or other controls.	8.1.4	Where ambient high-care areas are required, a documented risk assessment shall be completed to determine the risk of cross-contamination with pathogens. The risk assessment shall take into account the potential sources of microbiological contamination and include: ● the raw materials and products ● the flow of raw materials, packaging, products, equipment, personnel and waste ● air flow and quality ● the provision and location of utilities (including drains). Effective processes shall be in place to protect the final product from microbiological contamination. These processes may include segregation, management of process flow or other controls.	Relocated from Issue 7, clause 4.3.7.

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8.2 BUILDING FABRIC IN HIGH-RISK AND HIGH-CARE ZONES

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.4.4	Where sites include high-risk or high-care facilities, there shall be a map of the drains for these areas which shows the direction of flow and location of any equipment fitted to prevent the back-up of waste water. The flow of drains shall not present a risk of contamination of the high-risk/care area.	8.2.1	Where sites include high-risk or high-care facilities, there shall be a map of the drains for these areas which shows the direction of flow and the location of any equipment fitted to prevent the back-up of waste water. The flow from drains shall not present a risk of contamination to the high-risk/care area.	Relocated from Issue 7, clause 4.4.4.
4.4.13	High-risk areas shall be supplied with sufficient changes of filtered air. The filter specification used and frequency of air changes shall be documented. This shall be based on a risk assessment, taking into account the source of the air and the requirement to maintain a positive air pressure relative to the surrounding areas.	8.2.2	High-risk areas shall be supplied with sufficient changes of filtered air. The filter specification used and frequency of air changes shall be documented, based on a risk assessment that takes into account the source of the air and the requirement to maintain a positive air pressure relative to the surrounding areas.	Relocated from Issue 7, clause 4.4.13.

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8.3 MAINTENANCE IN HIGH-RISK AND HIGH-CARE ZONES

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.7.5	Maintenance activities undertaken in high-risk and high-care areas shall respect the segregation requirements of the area. Wherever possible tools and equipment shall be dedicated for use in the area and be retained in the area.	8.3.1	Maintenance activities undertaken in high-risk and high-care areas shall respect the segregation requirements of the area. Wherever possible, tools and equipment shall be dedicated for use in that area and retained in the same.	Relocated from Issue 7, clause 4.7.5.
		8.3.2	Where equipment is removed from the high-risk or high-care area, the site shall have a procedure to ensure the cleanliness and removal of contamination hazards before being accepted back into the area. Records of acceptance back into the area shall be maintained.	New requirement highlighting the need for controls when accepting equipment back into a high-risk or high-care area so that it doesn't inadvertently become a source of microbiological contamination.
		8.3.3	Where portable equipment (e.g. handheld devices) is used in high-risk or high-care areas, these items shall either be: ● visually distinctive and dedicated for use in that area **or** ● have specific procedures (e.g. a full clean) to ensure that their use does not result in contamination.	New requirement to ensure that the site has suitable procedures for portable handheld devices so that they do not inadvertently become a source of microbiological contamination.

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8.4 STAFF FACILITIES FOR HIGH-RISK AND HIGH-CARE ZONES

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.8.4	Where an operation includes a high-risk area, personnel shall enter via a specially designated changing facility at the entrance to the high-risk area. The changing facilities shall meet the following requirements: ● Clear instructions shall be provided for the order of changing into and out of dedicated protective clothes to prevent the contamination of clean clothing. ● Protective clothing shall be visually distinctive from that worn in other areas and shall not be worn outside the high-risk area. ● Hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing (i.e. hand-washing after hair covering and footwear has been put on, but before handling clean protective clothing). ● Prior to entry to high-risk areas, hand-washing and disinfection shall be provided and used.	8.4.1	Where an operation includes a high-risk or high-care area, personnel shall enter via a specially designated changing facility at the entrance to the area. The changing facilities shall incorporate the following: ● clear instructions for the order of changing into and out of dedicated protective clothes to prevent the contamination of clean clothing ● protective clothing that is visually distinct from that worn in other areas and which shall not be worn outside the area ● a hand-washing routine during the changing procedure to prevent contamination of the clean clothing (i.e. hand-washing after hair covering and footwear have been put on, but before handling clean protective clothing) ● provision and use of hand-washing and disinfection facilities. At a minimum these shall be: – prior to entry for high-risk areas – on entry for high-care areas ● dedicated site footwear that is provided by the site and which shall not be worn outside the factory	Issue 7 clauses 4.8.4 and 4.8.5 have been combined to form a single clause on staff facilities.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.8.4 *cont.*	• Dedicated footwear shall be provided to be worn in the high-risk area with an effective system to segregate areas for wearing high-risk and other footwear (i.e. a barrier or bench system). By exception the use of boot-wash facilities is accepted where these demonstrably provide an effective control of footwear to prevent the introduction of pathogenic material into high-risk areas. A programme of environmental monitoring shall be established to assess the effectiveness of footwear controls.	8.4.1 *cont.*	• an effective control of footwear to prevent the introduction of pathogens into the area. Control may be by segregation and a controlled change of footwear before entering the area (such as a barrier or bench system) or by the use of controlled and managed boot-wash facilities where these demonstrably provide an effective control of footwear to prevent the introduction of pathogens into the area. A programme of environmental monitoring shall be used to assess the effectiveness of footwear controls.	
4.8.5	Where an operation includes a high-care area, personnel shall enter via a specially designated changing facility with arrangements to ensure that protective clothing will not be contaminated before entry to the high-care area. This shall incorporate the following requirements: • Clear instructions for the order of changing into and out of dedicated protective clothes to prevent the contamination of clean clothing. • Site-provided footwear shall not be worn outside the factory. • Protective clothing shall be visually distinctive from that worn in lower risk areas and shall not be worn outside of the high-care area.			

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.8.5 *cont.*	• Hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing. • On entry to high-care areas, hand-washing and disinfection shall be provided and used. There shall be an effective control of footwear to prevent the introduction of pathogens into high-care areas. This may be by a controlled change of footwear before entering the area or by the use of controlled and managed boot-wash facilities. A programme of environmental monitoring shall be established to assess the effectiveness of footwear controls.			

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8.5 HOUSEKEEPING AND HYGIENE IN HIGH-RISK AND HIGH-CARE ZONES

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.2	Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures for processing equipment, food contact surfaces and environmental cleaning in high-care/high-risk areas shall as a minimum include the: ● responsibility for cleaning ● item/area to be cleaned ● frequency of cleaning ● method of cleaning, including dismantling equipment for cleaning purposes where required ● cleaning chemicals and concentrations ● cleaning materials to be used ● cleaning records and responsibility for verification. The frequency and methods of cleaning shall be based on risk. The procedures shall be implemented to ensure appropriate standards of cleaning are achieved.	8.5.1	Environmental cleaning procedures in high-care/ high-risk areas shall, at a minimum, include: ● responsibility for cleaning ● item/area to be cleaned ● frequency of cleaning ● method of cleaning, including dismantling equipment for cleaning purposes where required ● cleaning chemicals and concentrations ● cleaning materials to be used ● cleaning records and responsibility for verification. The frequency and methods of cleaning shall be based on risk, and the procedures shall be implemented to ensure that appropriate standards of cleaning are achieved.	Cleaning procedures for high-risk and high-care areas were previously covered within Issue 7, section 4.11, but cleaning of these areas has now been transferred to this new section.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.3	As a minimum for food contact surfaces, processing equipment and for environmental cleaning in high-care/high-risk areas, limits of acceptable and unacceptable cleaning performance shall be defined. This shall be based on the potential hazards (e.g. microbiological, allergen, foreign-body contamination or product-to-product contamination). Acceptable levels of cleaning may be defined by visual appearance, ATP bioluminescence techniques (see glossary), microbiological testing or chemical testing as appropriate. Where cleaning procedures are part of a defined prerequisite plan to control the risk of a specific hazard the cleaning and disinfection procedures and frequency shall be validated and records maintained. This shall include the risk from cleaning chemical residues on food contact surfaces.	8.5.2	Microbiological limits for acceptable and unacceptable cleaning performance shall be defined for high-risk/ high-care production risk zones. These limits shall be based on the potential hazards relevant to the product or processing area. Therefore, acceptable levels of cleaning may be defined by visual appearance, ATP bioluminescence techniques (see glossary), microbiological testing, allergen testing or chemical testing as appropriate. The site shall define the corrective action to be taken when monitored results are outside of the acceptable limits. Where cleaning procedures are part of a defined prerequisite plan to control the risk of a specific hazard, the cleaning and disinfection procedures and frequencies shall be validated and records maintained. This shall include the risk from cleaning chemical residues on food contact surfaces.	Acceptable limits for cleaning of high-risk and high-care areas were previously covered within Issue 7, section 4.11, but these have now been transferred to this new section.

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ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
4.11.6	Cleaning equipment shall be: ● hygienically designed and fit for purpose ● suitably identified for intended use (e.g. colour coded or labelled) ● cleaned and stored in a hygienic manner to prevent contamination. Equipment used for cleaning in high-care and high-risk areas shall be visually distinctive and dedicated for use in that area.	8.5.3	Equipment used for cleaning in high-care and high-risk areas shall be visually distinctive and dedicated for use in that area.	Cleaning equipment for high-risk and high-care areas was previously covered within Issue 7, section 4.11, but this has now been transferred to this new section.

8.6 WASTE/WASTE DISPOSAL IN HIGH-RISK, HIGH-CARE ZONES

ISSUE 7		ISSUE 8		
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	COMMENTS
		8.6.1	Waste disposal systems shall ensure that the risk of contamination of products is minimised through the control of potential cross-contamination. Risk assessment shall consider the movement and flow of waste and waste containers. For example, waste bins should be dedicated to either high-risk or high-care areas and not be moved between different production risk zones.	New requirement to ensure that the waste management system is controlled to prevent the potential for waste collection activities to be a route of contamination in high-risk and high-care areas.

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8.7 PROTECTIVE CLOTHING IN HIGH-RISK AND HIGH-CARE ZONES

ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
7.4.3	Laundering of protective clothing shall take place by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure: ● adequate segregation between dirty and cleaned clothes ● effective cleaning of the protective clothing ● protective clothing for high-risk or high-care areas is commercially sterile following the washing and drying process ● cleaned clothes are supplied protected from contamination until use (e.g. by the use of covers or bags). Washing of protective clothing by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.	8.7.1	Laundering of protective clothing for high-risk and high-care areas shall be by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure: ● adequate segregation between dirty and cleaned clothes ● adequate segregation between clothes for high-risk, high-care and low-risk areas etc. ● effective cleaning of the protective clothing ● commercial sterilisation of the protective clothing following the washing and drying process ● protection of the cleaned clothes from contamination until use (e.g. by the use of covers or bags).	Laundering for high-risk and high-care areas was previously covered within Issue 7, clause 7.4.3, but this has now been transferred to this new section.
7.4.4	Where protective clothing for high-care or high-risk areas is cleaned by a contracted or in-house laundry, this shall be audited either directly or by a third party. The frequency of these audits should be based on risk.	8.7.2	Where protective clothing for high-care or high-risk areas is cleaned by a contracted or in-house laundry, the laundry shall be audited either directly or by a third party. The frequency of these audits shall be based on risk.	Laundries for high-risk and high-care areas were previously covered within Issue 7, clause 7.4.4, but these have now been transferred to this new section.

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ISSUE 7		ISSUE 8		COMMENTS
CLAUSE	REQUIREMENTS	CLAUSE	REQUIREMENTS	
7.4.5	Protective clothing shall be changed at an appropriate frequency, based on risk. For high-risk and high-care areas the protective clothing shall be changed at least daily.	8.7.3	Protective clothing for use in high-risk and high-care areas shall be changed at an appropriate frequency based on risk, and at a minimum daily.	Changes of protective clothing for high-risk and high-care areas were previously covered within Issue 7, clause 7.4.5, but these have now been transferred to this new section.