



FOOD SAFETY STANDARD FOR SUPPLIERS

Issue No. 3
April 2005

FOOD SERVICE SUPPLIER QUALITY ASSURANCE POLICY

It is the policy of Spotless to provide clear standards for supplier quality assurance in the market we serve. The Spotless Quality Assurance Standard includes as the minimum requirement the national uniform food safety legislation developed by Food Standards Australia New Zealand (FSANZ).

Supplier compliance will be determined through effective inspections by Spotless staff and by audits conducted by approved independent third party auditors of the Spotless Quality Assurance Standard. Through this policy, our objectives are:

- Compliance with or better than the statutory/regulatory standards set by government.
- The provision of safe quality foods to our customers.
- The participation of all Spotless food handlers in managing supplier food safety compliance.
- Provision of quality safe food along the food chain from source to receipt by Spotless.

The ultimate responsibility of overseeing these objectives rests with the Board of Directors of Spotless, however the Managing Director is responsible for the direct management of Supplier Food Services Quality assurance.

The responsibility for branch food service supplier quality assurance belongs to Spotless location management.

The responsibilities and objectives outlined in this policy have my personal commitment. I seek the commitment of all Spotless team members and Suppliers to ensure Spotless achieves the highest of standards in regard to supplier food safety quality assurance.

Yours faithfully



Peter A Wilson
Managing Director

April, 2005

Table of Contents

1.	EXPLANATION OF THE STANDARD	4
2.	GLOSSARY OF TERMS	6
3.	DOCUMENT CONTROL	9
4.	HACCP	12
5.	GOOD HYGIENE PRACTICES	15
6.	GOOD MANUFACTURING POLICIES	18
7.	CALIBRATION.....	21
8.	TRAINING	23
9.	CLEANING	25
10.	PEST CONTROL.....	27
11.	PRODUCT IDENTIFICATION & TRACEABILITY	29
12.	APPROVED SUPPLIER PROGRAM.....	31
13.	LABELLING.....	33
14.	ALLERGEN IDENTIFICATION & CONTROL	34
15.	ENVIRONMENT, GROUNDS, SERVICES & BUILDINGS.....	36
16.	PREVENTIVE MAINTENANCE	37
17.	RECALL PROCEDURES	39
18.	EVIDENCE OF COMMITMENT TO CONTINUOUS IMPROVEMENT.....	41

1. Explanation of the Standard

Spotless Services Australia Limited is committed to providing the customer with a product and service that is of the highest quality and safety.

In order to meet the requirements of the customer, a Standard for the receipt, storage and handling, production and distribution have been developed.

To ensure Spotless Services is protected against product quality and safety defects; you will be required to have product liability insurance.

To ensure you can provide Spotless Services with the products required, all products will be clearly defined within an agreed product specification.

The Standard requires that you use the internationally recognised Codex Alimentarius Commissions HACCP guidelines to identify all significant hazards. You are required to effectively prevent, reduce or eliminate all food quality and food safety hazards occurring.

Support systems that cover, but are not limited to, issues such as training, good manufacturing practice, pest control and product recall will be developed to aid in the implementation of an effective HACCP program.

Implementation of this Standard will provide Spotless Services with a high level of confidence in your ability to produce and supply a product of consistent quality and safety. This standard will ensure that you are compliant with the regulatory requirements.

Distributors of potentially hazardous foods will have specific requirements of their suppliers that are listed in this Standard. Liquor suppliers must either meet the requirements of this Standard or demonstrate third party Certification under another HACCP based Standard, which has been audited by a food safety auditor.

You will be expected to work towards implementing and maintaining this Standard in the form of a Quality Management System, to continue to supply Spotless Services.

Once the system is developed, documented and implemented, you will be expected to prove your system works ie. the effectiveness of the system. Verification will be undertaken by suitably trained and skilled internal auditors.

The system will also need to be verified by a Spotless Services nominated external auditing body to ensure compliance with the Standard. On successful completion of this verification, you will be granted certification to the Standard. This certification will specifically identify the products, processes and premises that you have nominated for certification.

Verification to the certification of the Standard will be ongoing and conducted regularly. Suppliers of products classified as High-risk will be audited twice per annum and Low-risk suppliers once per annum.

To ensure that HACCP is well understood and the principles are effectively implemented by you, it is strongly recommended that at least one person from your organisation undertake formal HACCP training. The training should provide you with some form of recognised certification at the successful completion of the course.

This Standard has been created to provide you with the requirements that you must implement and a reasoning that describes what is involved and why it is important.

We look forward to your commitment and cooperation to achieving this Standard. The result is you providing us with a safe, quality and reliable product that customers will enjoy repeatedly.

Chris Anderson
Group General Manager - Procurement
Spotless Group Ltd

2. Glossary of Terms

ALLERGEN - A material or product that, when introduced to sensitive populations, brings on a negative health effect to the consumer. These health effects can be potentially fatal.

AUDIT - Systematic and independent examination to determine whether specified safety and quality activities have been implemented and are being adhered to.

COMPLIANCE - The ability to meet the requirements of a standard, guideline or documented policy.

CONTROL POINT - Any point or step or operation in a process where the process or hazard can be controlled.

CORRECTIVE ACTION - Action taken to regain control over a process that is outside the specified critical limits or action taken to identify, review and dispose of any discrepancies.

CRITICAL CONTROL POINT - Any point where loss of control leads to an unacceptable health risk.

CRITICAL LIMIT - A tolerance that must not be exceeded, to ensure the control point does not initiate a hazard.

FLOW CHART - A document that visually portrays the process of manufacture of a product from first to last process control step. The document uses basic shapes that identify general processes connected by arrows to show the direction of manufacture. All major inputs and manufacturing steps are identified on this flow chart.

FOOD SAFETY AUDITOR - a person who is Certified by the RABQSA to conduct food safety audits.

FORM - A formatted document outlining areas of monitoring for which observations and data is to be recorded.

FREQUENCY - The amount of times and activity is to occur within a given time.

HACCP - Hazard Analysis and Critical Control Point. The process of identifying and assessing product and production related hazards, and the process of controlling and monitoring them.

HACCP AUDIT TABLE - All documented critical control points and their monitoring and corrective actions formatted into a table.

HACCP PLAN - The documented process flow diagrams, product description and intended use, hazard analysis tables, HACCP audit tables and verification schedules for a product and process.

HALAL - Primarily a product that does not contain pork or its derivatives and alcohol or its derivatives. A product which meets all requirements of Muslim Food Law.

HARBOURAGE - A place where pests and vermin can nest and breed.

HAZARD - Any physical, chemical, microbiological or quality property that can alter, taint, damage or render useless, any critical property of a product or process, which may result in a risk to health and safety.

HYGIENE - The cleanliness or property of health of a particular person, surface, product or process.

IMPLEMENTED - The act of putting into place all procedures, documents and activities by distributing documents, providing training and assessing the effectiveness of programs.

KOSHER - Primarily any product that does not contain any animal product originating from a beast of cloven hoof, any fish that has scales, any crustacean, any dairy product or any product containing insects or its derivatives. A product, which meets all requirements of Jewish Food Law.

LIKELIHOOD - The chance that an event will occur.

MATERIAL SAFETY DATA SHEET - A document that outlines the physical properties of a chemical or compound. It clearly identifies any risks and effects to human health and any first aid and emergency procedures with which to treat or contain the material.

NUTRITIONAL ANALYSIS - Results that indicate the level of nutrition, sustenance or goodness contained within a determined serving of product.

ORGANISATION - A company, industry, group of companies or a business with a registered trade name.

POTENTIALLY HAZARDOUS FOODS - means food that must be kept at certain temperatures to minimise the growth of any harmful micro-organisms that may be present in the food, or to prevent formation of toxins in the food.

PROCEDURE - A document describing the structure or rules with which a process is to be followed.

PRODUCT DESCRIPTION AND INTENDED USE - A document that identifies the unique characteristics or properties of a group of similar products.

PRODUCT SPECIFICATION - A legal document that specifically addresses all unique properties of an individual product, including its quality, safety, legal and labelling parameters.

QUALITY - Fitness for purpose. A product or service that can consistently meet the specific requirements of the consumer.

QUALITY CONTROL POINT - Any point in a process where loss of control leads to a consumer complaint or product return. These actions may require compensation in the form of monies or exchange and furnishing of product(s).

RECORD - A form that has documented data or observations recorded on it.

SEVERITY - How bad an effect will be on health or product quality.

THIRD PARTY AUDIT AGENCY - a business which has been accredited to Certify other businesses via an independent audit process using suitably qualified auditors. For the purposes of the Spotless Standard the auditors must be either full or senior food safety auditors Certified by the RABQSA..

SIGNIFICANCE - The importance of the effect to health and to the business.

VALIDATION - The act of providing documented evidence through research, results or theoretical values that a particular property of the product can be met.

VERIFICATION - A detailed examination of the Food Safety plans to determine if they are documented, implemented and effective.

WORK INSTRUCTION - A detailed document outlining specific duties that makes up a process or group of duties.

3. Document Control

Requirements

The organisation shall develop, document and implement a manual that includes:

- **A quality food safety policy**
The policy shall outline the organisation objectives for supply and the goals to achieve the required standards, it should also outline the commitment to continuous improvement. This shall be signed by the Manager with executive responsibility.
- **Organisation structure, job descriptions and responsibilities**
The organisation shall define peoples responsibilities with respect to food safety and quality. Job descriptions or equivalent documentation will identify, clearly, what the duties and responsibilities of the employee are and their responsibility to the Standard and their inter-relationships in the organisation. A designated person shall be defined as the managements representative for food safety and quality matters.
- **A document register**
Any document that is created to meet the requirement of this Standard, be it a procedure, work instruction, operating procedure, form or reference, will be controlled to ensure only the most current version is available to all staff. Each document shall be authorised by the designated management representative. This information will be recorded in a register that covers all this information.
- **An amendments register**
Registers or equivalent shall be kept for all documents, procedures, forms and records that are contained within the manual and are identified as being developed for the standard. A register will be kept for any changes that occur to any documentation identified in the manual.
- **Liability insurance policy**
The organisation will purchase liability insurance to cover both product and public indemnity to a total value of no less than AUS\$10 million.
- **A customer complaints procedure**
All customer complaints will be recorded and investigated to identify the cause and the appropriate action to rectify the complaint. All corrective actions, correspondence and investigations will be documented, controlled and kept for review. This shall include all feedback regarding food safety issues as well as quality.
- **Corrective and preventative actions procedure**
A procedure shall be developed, documented and implemented to identify any problems that arise as a result of normal work practices, reviews or complaints. The procedure shall address how the problem is investigated to

determine the root cause of the problem and immediate actions taken as well as preventative action taken to eliminate future occurrences, how it shall be addressed and who will address it. When the corrective action has been completed, it shall be reviewed for effectiveness and the results documented.

- **A document control procedure**

The organisation shall describe how the documentation, identified in the manual, is developed, documented, circulated, reviewed, amended, identified and stored to ensure that only the most current version is available to all staff. The procedure will describe how all documentation is protected from theft, damage or loss.

Records for the verification of these procedures and any corrective actions to problems identified shall be kept by the organisation.

Reasoning

For an organisation to be able to demonstrate that it can effectively control its product and services that are critical to the quality and safety, they will need to document how this is done. The documenting and implementing of procedures, work instructions, forms and specifications provides a number of functions to the business, those being:

- To provide a direction for employees to consistently work and aim,
- To create a training tool for which to induct new employees and retrain or multiskill existing employees,
- To provide both the customer and the organisation a clear description of the products and services offered,
- To identify all critical quality and safety parameters involved with the provision of goods and services offered,
- To give external auditors objective evidence that the processes are capable of being controlled.

Product and public liability provides financial and legal protection for the organisation against consumer dissatisfaction.

Customer complaints provide feedback to the organisation about the quality and safety of the product or service offered to the consumer. It is a tool for the investigation of complaints, to ensure a quick, accurate and effective resolution to the problem. It also demonstrates to external auditors that the organisation is able to recognise and deal with problems that occur with their customers.

Document control is the means by which an organisation provides relevant and current information about procedures, products and services to both the employees of the organisation and the customer.

It is a requirement that only the most current and controlled documents are available for use. It is recognised that over time, procedures, directives, products and services change and the documentation will change to reflect this. To avoid any confusion, misconception or dissatisfaction, all outdated and superceded documents shall be removed from use or circulation.

4. HACCP

Requirements

The organisation shall develop, document and implement:

- **Codex principles and guidelines to identify, assess and control any hazards that can affect the quality and safety of the product or service.**

The documentation shall contain the seven principles of HACCP, which are:

- To conduct a hazard analysis
 - Determine the Critical Control Points
 - Establish critical limit(s)
 - Establish a system to monitor control of the CCP
 - Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control
 - Establish procedures for verification to confirm that the HACCP system is working effectively
 - Establish documentation concerning all procedures and records appropriate to these principles and their application
- **Finished product specifications**
Specifications must be developed for each individual product or product type and service covered by the scope of the certification. The specifications must be agreed to by both supplier and customer.
- **Product Description and Intended Use**
A document will be developed that covers the following issues:
 - Description
 - Composition
 - Method of preservation
 - Packaging - primary and secondary
 - Storage and handling
 - Distribution
 - Shelf life
 - Intended use
 - Special labelling
 - Sensitive consumers
 - Final mode of consumption

The document will be developed to provide a general description of similar categories or groups of products. Each product different category or group will require a separate document.

- **Flow Chart.**

The production process will be identified in a flow chart identifying all major process steps and their inputs.

Critical control points and quality control points will be identified on the flow charts.

Where a product or process requires a specific step procedure or handling method, a new flow chart will be developed.

- **The organisation shall include a documented hazard analysis for each flow chart or process.**

The organisation shall ensure that the hazard analysis is documented showing the:

- Step
- Hazard
- Cause of the hazard
- Significance
- Severity
- Likelihood
- Control measure

- **The organisation shall include a documented HACCP audit table addressubg each flow chart or process.**

The audit table will include the:

- Step
- Hazard
- Determined critical control points and quality control points.
- Critical limit
- Monitoring procedure - what, how, when, where, who
- Corrective action - product and who is responsible; process and who is responsible.
- All records kept

- **The organisation shall include a verification schedule.**

The verification will include the:

- Activity
- Frequency of verification
- Person responsible for verification
- All records kept

The verification schedule will include the routine review of all elements of HACCP and the support programs outlined in this Standard.

Records for the verification of these procedures and any corrective actions to problems identified shall be kept by the organisation.

Reasoning

The organisation must be able to demonstrate that it has identified and assessed all quality and safety risks to the product because of activities conducted on site.

Once the hazards have been assessed for significance, they should be determined as to whether they can be controlled, reduced or eliminated at any previous or following step. If they cannot, then they shall be determined as critical control points (CCP's) and quality control points (QCP's).

All CCP's and QCP's shall then be assigned a critical limit by which they can operate within, this shall be monitored to ensure it remains within the limits.

If the critical limits are exceeded, the organisation shall ensure that the corrective action for the product and process is determined, conducted and recorded.

To ensure that the HACCP system remains relevant and effective, a routine review of all documentation, activities and support programs shall be conducted. The organisation must be able to demonstrate to external auditors that the system has been implemented and is effective. This shall be done by keeping records of any monitoring activities, corrective actions, verification activities and validation results.

Typical verification activities that must be followed (where appropriate) to ensure the system is effective are:

- Microbial Testing
- Chemical Testing
- Swabbing
- Shelf Life Validation - microbiological and food quality
- Physical Assessment of Product Against Specification
- Regular Internal Audits
- On - Site Review
- Review of Customer Complaints
- CCP Appropriateness
- Re-validation Of Critical Limits
- Review of Monitoring & Corrective Actions
- Audit of Support Programs
- HACCP Plan Audit
- Review of Changes to Documentation

Where the shelf life of a product is being routinely verified, they must first be validated to ensure that the product can meet these requirements.

To demonstrate that any critical limits, used by the product and process, are not placed at risk, all limits, data and safety values should be validated by the collection of data, testing results, theoretical values, guidelines and industry standards.

5. Good Hygiene Practices

Requirements

To ensure that the product or service is not compromised by the employees and their practices, the organisation shall develop, document and implement a procedure to control any associated risks.

The document shall, where applicable, include the following:

- **Personnel health policy**

The policy shall identify how staff is to dress, act and clean themselves whilst on site, to minimise any risk to the product safety or quality. It should identify the organisations policy on clothing, hair/beard nets, handwashing, returning to work from breaks, staff cleanliness, coughing and sneezing.

The wearing of make-up, cosmetics, false fingernails or nail polish will be assessed and documented.

- **Illness and injury policy**

The organisation shall identify how it handles any employee who is affected by cold, flu or other contagious illness. Where an employee has cuts, abrasion or other open wound, the organisation shall document a procedure to ensure that the employee does not expose the product to any risk.

- **Clothing and jewellery policy**

The organisation shall ensure that the product is not contaminated by any foreign objects such as jewellery or items carried on clothing.

Where uniforms are worn, a policy shall be developed to cover the use, storage and cleaning of these.

Where gloves are worn, a policy shall be developed to ensure the gloves are changed frequently or when contaminated, and in what areas gloves shall be used.

- **Induction program**

All employees shall be made aware of the organisations policies on hygiene practices and shall sign a document stating that they have understood these terms. The induction shall be covered extensively under training procedures, but will be outlined in the hygiene policy.

- **Eating, drinking and smoking policy**

To avoid any tainting, spoilage or contamination of product, the organisation will document a procedure to define where staff can eat, drink and smoke. This policy shall ensure that there will be no risk to product quality or safety, by controlling activities to areas outside of production.

- **Staff movement policy**

Where staff move throughout the site as part of their duties, they may introduce the risk of product contamination from other environments on or around the site. The organisation should identify any potential risks because of staff movements and implement a procedure for its control.

- **Visitor policy**

Where visitors, including sub-contractors, are moving through or about an environment, they may cross-contaminate the product or the environment. The organisation shall document a procedure for control.

- **Cross contamination risk procedures**

In the event that production of goods can cause a cross contamination from other ingredients or equipment, a procedure shall be developed to reduce or eliminate the risk.

A procedure shall be developed to ensure all staff are following the policies developed. This can be in the form of a checklist, and audit procedure or another observation technique. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records for the verification of these procedures and any corrective actions to problems identified shall be kept by the organisation.

Reasoning

People and their practices introduce a number of risks to the production of a food or service. These risks should be realised and reduced or eliminated to ensure the product's integrity is protected.

The way people are dressed, their personal appearance and their habits should be controlled by documenting a set of procedures by which an employee is to follow.

If people conduct work duties whilst affected with an illness or an undressed wound, they present a serious microbiological risk to the product. These employees should be removed from duties, which are exposed to the product, until the illness or injury has cleared. In some instances, a medical examination of the employee may be required to confirm the employee's fitness for work.

The provision of areas for employee breaks, should be of a suitable condition and location to ensure that any hazards are not introduced from break activities or any reintroduction of hazards from the environment in which they break.

Good Hygiene Practice activities shall be routinely monitored and reviewed to ensure effectiveness. Where any verification activities are conducted, they shall be recorded and kept.

Any problems identified, as a result of these verification activities will be recorded, acted upon and the resolution recorded and kept for review.

The keeping of records provides objective evidence to external auditors, that the organisation is able to control any hazards associated with personnel and their activities and the organisation is able to rectify any problems associated with these activities.

6. Good Manufacturing Policies

Requirements

To ensure the quality and safety of products and services offered to the consumer, the organisation must develop, document and implement a procedure that ensures practices are appropriate and maintained throughout the process.

The procedure will specifically refer to the following:

- **Receival of potentially hazardous foods**
When receiving potentially hazardous foods, temperatures of chilled foods must be below 5°C and temperatures of hot foods must be above 60°C. Frozen food must be frozen. A procedure for receival of potentially hazardous foods shall be developed and documented. Records of receival temperatures shall be kept.
- **Waste identification and control**
Where a waste or by-product is generated as a result of the process, it should be effectively identified to ensure that it cannot be reintroduced into the process or finished product.
- **Storage of Chemicals**
Any chemicals used on site that can taint or harm the product shall be isolated from any production environment. A procedure for the control of these chemicals shall be developed and documented. Where necessary, these chemicals shall be placed under secured storage and are released to authorised personnel only.
- **Dropped product policy**
Any product that is dropped on the floor or another non-food grade or sanitised surface should be discarded or treated in a manner that effectively eliminates any contamination to product or process.
- **Glass policy**
Glass poses a critical foreign object contamination risk to the product. A policy will be developed outlining the use of any glass on site. Where glass forms the basis of the construction or lighting of the site, practices shall be put in place to remove or reduce the threat of glass contamination. Where the removal of glass from a work environment is not practical, a procedure will be developed to control the hazard in the event of any glass breakage.
- **Wood policy**
These policies should be developed to help reduce or prevent the use or introduction of foreign objects to product. The policies should state quite clearly whether these materials are acceptable for use within the processing environment.

- **Stock rotation policy**
In order to protect the quality and safety of product being offered to consumers, there should be an adequate stock rotation policy in place to ensure that the oldest products and materials are used first and within their 'used by' date for product with 'use by'.
- **Temperature controls/actual temperature monitoring processes**
Temperature is one of the main hazards in a processing environment. In order to control, reduce or eliminate the hazard caused by inadequate temperature controls, a procedure should be developed to state what monitoring is required, how often, where and at what temperature.
- **Use of signs**
Signs help remind the employees of their obligations to food safety and quality by employing practices and techniques. There should be a policy to state the type of signage that will be used and where it will be used. Signage should not be displayed in a manner that creates a hazard.
- **Water quality**
Water quality can affect the safety or quality of a product or service and should be considered for organisations that are using recycled, treated, or non-town water supplies.

A procedure shall be developed to ensure all staff are following the policies developed. This can be in the form of a checklist, and audit procedure or another observation technique. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

- **Transport**
Potentially hazardous chilled foods must be delivered at temperatures below 5°C; and potentially hazardous hot food must be delivered above 60°C. Frozen food must be delivered frozen.

A procedure shall be developed to ensure that the temperature of transportation of these foods is maintained. This may be in the form of a driver logbook or similar. Verification activities must be developed and documented. This may be through the use of dataloggers at specified frequencies.

Records of verification and any corrective actions shall be kept.

Reasoning

The policies outlined above ensure that the product being produced minimal exposure to hazards caused whilst on site and during transportation.

It provides clear guidelines for employees, who directly handle or can have a direct affect on the quality or safety of the product, to follow to ensure minimal risk to the product.

The guidelines form part of the manufacturing requirements for the production of the finished product. They can be used also a training aid to induct new employees or retrain existing employees.

Signage helps remind workers of the policies adopted by the organisation and should be placed in prominent and sensible positions where they will have maximum effect.

Waste control reduces the likelihood of pest harbourage and improves the housekeeping of the site, again reducing the likelihood of product contamination.

By documenting these procedures, the organisation has a set of parameters with which to verify the effectiveness of foreign contamination control and gives external auditors objective evidence that the company can identify potential hazards and monitor and manage these.

7. Calibration

Requirements

The organisation shall develop, document and implement a procedure to ensure that all equipment used to inspect, measure or test the product at a critical control point or a quality control point is reading accurately.

The procedure will address the following:

- **List of inspection, test and measuring equipment**
All measurement, inspection, test and monitoring equipment that is critical to the quality and/or safety of the product will be recorded. The list of this equipment will identify each individual item, its accuracy and its location. In some cases special storage of equipment may be required in order to preserve its accuracy.
- **Schedule of calibration checks and full calibrations**
The organisation will list all equipment that is used in the testing of product and the frequency with which it is tested. Included in this listing of equipment shall be the accuracy to which each piece of equipment reliably works. This is generally the manufacturers requirement unless the accuracy can be increased because of some internal procedure.
- **Procedures for calibration**
If any calibration of equipment is conducted by the organisation, then there will be a set of procedures or work instructions developed to demonstrate the method. These methods will be of an acceptable or recognised standard used within industry. Equipment used to verify or calibrate IMTE should be certified as traceable to a National or International Standard where one exists and if one does not exist the basis of calibration shall be documented
- **Replacement policy for equipment out of calibration**
Where a piece of equipment is found to be out of calibration, it must be identified in a manner that distinguishes it from any operational equipment and shall be removed from service. A policy outlining this procedure will be documented.
- **Investigation of any product found to be inspected, tested or measured on equipment that is out of calibration**
When a piece of equipment is found to be out of calibration a procedure should be developed to address both the replacement or correction of the equipment and the retest or investigation of any product that may have been tested on this equipment. The corrective action should be recorded, and reviewed routinely.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine

shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

When testing all products against parameters that have been deemed essential or critical, as defined by the HACCP analysis, it is important that the equipment is reading true.

The frequency of testing will be determined by the criticality of the result, the amount of use the piece of equipment receives, the location and the range of values at which the product is tested at.

By completing a list of all equipment, it gives the organisation an indication of the amount of equipment that performs an essential role and creates part of the preventive maintenance schedule.

The difference between calibration checks and full calibration should be understood and documented.

A calibration check will be a daily or weekly check of the accuracy of the reading of a piece of equipment. For example, a daily check of a scale by using a standard weight to check the reading.

A full calibration of equipment will be conducted, usually, by an external contractor or agency such as the Department of Trade Weights and Measures. These calibrations will be conducted annually or biannually and a certificate will be provided as to the accuracy of the equipment.

Types of equipment that shall be calibrated on-site include hand-held temperature probes, thermometers, coolroom gauges, pH probes, scales, density meters, viscometers, load cells, weighbridges, etc.

8. Training

Requirements

The organisation will ensure that all activities, duties or other functions that have an effect on the quality or safety of the product or service, or an activity that is identified as a CCP or QCP, are conducted by suitably trained staff.

The procedure will address the following:

- **Quality Food Safety assurance of staff**
- **Identification of training needs**
At least one person from the business shall have attended a HACCP training course and a record of the training shall be kept.

When hiring or training staff, it is important that all staff hold the relevant skills and qualifications. A regular review of staff training levels and requirements will ensure that as staff change roles and functions, all critical operations will be performed by skilled staff.

- **A training schedule**
An organisation should develop a training program identifying all staff and the available training offered by the company. Training shall be recorded and ongoing needs assessed and documented.
- **Training procedures**
Where specific training procedures are employed, the organisation shall document these. Areas where specific training may be required are production techniques, sampling techniques or analysis methods.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified.

Records of the verification and any corrective actions shall be kept.

Reasoning

Training ensures that employees are suitably skilled to consistently undertake the tasks performed. In areas where the quality or safety of the product can be compromised because of inadequate handling or testing methods, training is essential and will be conducted.

By reviewing training of employees, the organisation is able to identify any shortcomings in the skills of its employees. Where employees change positions or take on new roles or rotate shifts, training should ensure that the employees are adequately skilled.

Keeping records of training provides the organisation with a history of training events and provides external auditors objective evidence of activities performed.

9. Cleaning

Requirements

The organisation shall develop, document and implement a procedure for the cleaning of all equipment, utensils and surfaces that come into contact or may present a risk to food surfaces or products.

The procedure will address the following:

- **Use of hot water**
Where appropriate, the use of hot water, in conjunction with cleaning chemicals, provides an effective means of reducing microbial and chemical contaminants. This shall be documented in the cleaning schedule.
- **Proper drainage**
Proper drainage ensures that water does not pool and create a potential microbiological hazard. The organisation shall implement a system for the removal of loose water from floors and equipment.
- **Cleaning schedule identifying all equipment and premise requirements**
- **Cleaning equipment and chemicals used including Material Safety Data Sheets (MSDS)**
- **Cleaning procedures**
To ensure all equipment, premises and surfaces are effectively cleaned and sanitised, the organisation shall create a list of cleaning, the chemicals used (where necessary), the methods used and the frequency of cleaning.

All chemicals used for cleaning and sanitising must be accompanied by a material safety data sheet and proof of suitability for use in a food environment.

- **“Between batch” cleaning procedure**
Cleaning between batches may be particularly important when changing between Kosher and non-Kosher, Halal and non-Halal, and allergen and non-allergen products. Where the quality of a product can be affected by contamination by previous batches, the organisation must define a procedure for the clean down in between batches.
- **Commercially laundered protective clothing**
Where company uniforms are provided and cleaning is arranged, a documented policy in line with personal hygiene requirements shall be written outlining the frequency of cleaning and the frequency of changing uniforms.
- **Swab test verification**
- **Cleaning and swab testing records**
To ensure the cleaning program has been effective swab testing, where applicable, will be carried out. The organisation will document a routine

testing program for swabbing of surfaces where food preparation or production occurs.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Cleaning of premises, plant and equipment reduces the risk of chemical, physical and microbiological contamination. Personnel involved with the cleaning program must be aware of the potential risk of using chemicals, and using chemicals outside the required dosage.

The organisation must ensure the cleaning program has been effective. This is conducted by the use of swabbing kits or other such methods. Swabbing is a requirement of high-risk industries such as meat and dairy processing, aseptic production and packaging, seafood processing, etc.

In some cases, low risk processing may be required to conduct swabbing results. Bakeries, fruit & vegetable processing, etc are areas where swabbing ensures processing surfaces do not contaminate product. Where the processing of a product results in large amounts of dirt, dusts, mud, liquids or other materials that would return exceptionally high swab or hygiene results, these businesses would not benefit from hygiene swabbing.

Records should be kept to prove cleaning and verification has occurred. Where problems with the cleaning program have been identified, corrective action must be taken to prevent contamination. Records of the corrective action are to be kept.

10. Pest Control

Requirements

The organisation must ensure that products or services are protected from pest infestation and contamination. The organisation shall develop clearly outlined procedures:

The procedures shall include:

- **Contractor credentials**
Pest control, where contracted, should be conducted by qualified and credentialed personnel. This documentation will be retained by the organisation.
- **Pest control schedule**
- **Bait maps**
To ensure the entire premises are controlled routinely to minimise the risk of pests, a schedule of treatments shall be developed. The schedule should address such issues as electric insect killers, strip curtains, air curtains, in-house pest control, contractor review. To aid in the application and verification of pest control, a bait map shall be provided depicting the type of control and the area it is being applied.
- **Chemicals used and Material Safety Data Sheets (MSDS)**
Any pest control chemical used on site will be accompanied with a material safety data sheet and proof of suitability for use within a food production environment.
- **Pest control procedures and records**
- **Pest sightings**
Where pest control is handled by the organisation or in conjunction with an external contractor, procedures will be written depicting the type of control used. Where sightings are made between pest control, these shall be recorded and any appropriate actions taken will be recorded.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Pests pose physical, microbiological and in some cases a chemical threat to product quality and safety. The control of pests will reduce the likelihood that product integrity will be compromised.

Pests can be an environmental, housekeeping or purchase related problem which should be addressed.

The organisation must ensure the pest control system is effective. A system of monitoring, auditing or review will need to be developed and any shortcomings or problems identified by this monitoring is to be acted upon and recorded.

11. Product Identification & Traceability

Requirements

To ensure the product or service offered by the organisation can be identified at receipt, at all stages of processing and upon delivery and use, a documented procedure will be implemented.

The procedure shall address the following:

- **Identification of incoming ingredients and/or products**
- **Traceability to Customers (eg Spotless outlets who receive it)**
- **Traceability back to growers and/or suppliers**
Organisations must be able to identify the supplier of the individual items purchased by the company. A procedure shall be implemented to ensure that supplier and product details are captured upon delivery.
- **Batch ingredient identification and control**
- **Identification and control of “work in progress”**
- **Reworked product**
To ensure the quality, safety, and integrity of the product is maintained during production, all batched or semi-manufactured and reworked products will be adequately identified and recorded. A procedure will be written detailing how the product is identified, handled and stored to ensure individual batch identities.
- **Packaging policy**
The organisation must ensure the integrity of product is maintained and easily identifiable from its packaging. The procedure must identify how the product is packed, identified and handled to ensure quality and safety.
- **Waste bins unique and clearly identified**
Where waste is generated during manufacture, storage or handling, this waste shall be contained and identified to ensure it does not contaminate the product or is able to reenter the manufacture process.

A procedure will be written identifying how waste is identified and handled. At no stage will waste be contained or identified using raw or finished product packaging and labelling.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Loss of identification of materials and product poses a threat to quality and safety of the finished product or service. Traceability ensures that the correct product is delivered to the correct customer at the right time in the right quantities.

Where multiple batches are being manufactured simultaneously, the risk of mishandling and compromising of product significantly increases. With the correct labelling, handling and storage of material and product, the risks are significantly reduced.

Identification of product reduces the extent of a recall in the event of a serious problem; it also helps to identify where the problem occurred during the storage, handling, processing and delivery stages.

Where problems are identified, actions shall be taken and records shall be kept, documenting the type of action and the product details. These shall be routinely reviewed to analyse trends that might be developing.

12. Approved Supplier Program

Requirements

Where a material, service or input is identified as having the potential to affect the quality or safety of the end product or service, the supplier shall be assessed to ascertain a high level of confidence in their product or service.

This process shall be documented and implemented and will address the following:

- **Quality assurance of suppliers to manufacturers/processors**
- **Means by which the incoming goods or services are evaluated**
- **Methods for monitoring performance**

The organisation shall ensure that a procedure is documented and implemented that depicts how it assesses its suppliers of materials and safety or quality critical services. The procedure shall identify how suppliers become approved and to what level of approval, whether provisional, a class, b class, etc. The procedure will identify how often the suppliers are evaluated and if monitoring at each delivery or supply is required.

Distributors of potentially hazardous foods (those foods requiring temperature control) shall ensure that their suppliers of those foods are quality assured under a HACCP based third party food safety audit process. The third party audit agency must be recognised by Spotless Services Ltd and the third party auditor must be a registered food safety full auditor who is Certified with the RBAQSA. Records of Certification of the suppliers of potentially hazardous foods shall be kept.

- **Approved supplier list**
- **Record keeping**

Where a supplier has been assessed, records of this assessment shall be kept and the determination of their status identified. For suppliers that reach approval status, a list or equivalent will be generated outlining the company name, products/services provided, approval status and review date.

- **Product testing/sampling frequency**

At routine intervals, the organisation shall verify the materials offered by inspecting the goods and assessing against the specifications. This will be contained in a documented procedure.

- **Raw material specifications**

Where necessary the organisation will request specifications from its suppliers, of all raw materials used in the production of the finished goods. All documentation obtained by the organisation will be retained and review periodically.

The procedure shall outline the products or services to be assessed, the sampling plan for these products or services and the frequency of this testing.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Products and services offered to an organisation can pose a serious threat to the quality and safety of the finished product. Often the hazards are “bought in”, and are not easily removed by production techniques.

For these reasons, suppliers must demonstrate their ability to deliver a product or service to a standard acceptable and agreed to by the organisation. It is the organisation’s responsibility to ensure the supplier can provide a product or service that does not compromise the quality and safety of their product.

Distributors of potentially hazardous foods do not have control over the manufacturing and/or preparation of those foods. For this reason it is important that the business can provide a high level of confidence in the safety of production of these foods. The only acceptable means of demonstrating confidence is to ensure that these suppliers have processes which are being controlled through the HACCP method, and which has been independently audited by suitably qualified auditors. A list of acceptable third party audit agencies which meet this criteria can be obtained from your contact at Spotless Services.

Companies that provide a service can present a definite quality or safety hazard to the product. For these reasons, any service that can affect the quality or safety of a product by introducing a chemical, foreign object, physical component or activity, shall be controlled.

Examples of such services are:

- Pest contractors, where chemicals and baits are introduced.
- Cleaning contractors, where again chemicals are used.
- Calibration services, which ensure the accuracy of equipment.
- Waste removal contractors, where rubbish provides harbourage and food for pests.
- Transport services, where goods are being carried with other products and not necessarily food, are being transported together.

Where problems are identified because of assessment of material, product or supplier, the appropriate corrective action should be undertaken and records of the problem and the corrective action documented.

13. Labelling

Requirements

The organisation shall ensure the products offered to the consumers meet all relevant Australian regulatory labelling requirements.

A procedure shall be developed, documented and implemented to include the following:

- **Compliance with State Trades, Weights & Measures legislation**
- **Compliance with the Australian Food Standards Code labelling requirements**
- **Inclusion of nutritional analysis information (where applicable)**
- **Labelling of allergens (where applicable)**

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Labelling often provides the consumer information about the composition, quality and safety of the product and for this reason the information contained on the packaging and specifications must be accurate and informative.

Nutritional analysis offers the consumer dietary information about the product, ingredient listing describes the composition and allergen labelling addresses issues for sensitive populations.

Any statement made on the packaging must be substantiated and able to be backed up by documented evidence.

Where statements are made about the country of origin, these must prescribe to the requirements outlined by the Trade Practices Act and the Food Standards Code, which must be able to be substantiated.

14. Allergen Identification & Control

Requirements

Allergen identification and monitoring for products offered to consumers, where applicable, will be established by the organisation.

The procedure for the identification, monitoring and management of allergens shall be developed, documented and implemented.

The procedure shall address the following:

- **Identification and maintenance of a list of allergens within the production of foods**
Where allergens are present as raw materials, these and the products with which they are added must be identified on a list.
- **Methods for management and procedures for control**
- **Control of rework**
Procedures must be developed for the handling of allergens within production. Methods for production scheduling, between production clean downs and separate line allocated shall be identified.

Where rework is used, procedures must indicate how it is control to prevent contamination of non-allergenic products.

- **Record keeping**
Records must be kept depicting the type of allergen, where it was used or reworked and the individual product labelling during production.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Allergens present a very real threat to immuno-compromised consumers. The information provided by the supplier is the only means a consumer can determine the safety of the product.

Allergens that must legally be declared on packaging are categorised into the following groups:

- Cereals containing gluten
- Wheat

- Rye
- Barley
- Oats
- Spelt and hybridised grains
- Crustacea and their products
- Egg and egg products
- Fish and fish products
- Milk and milk products
- Nuts and sesame seeds and their products
- Peanuts and soybeans and their products
- Sulphite in concentrations of 10mg/kg or more

It is the responsibility of the organisation to ensure that the consumer is at no risk from the use or consumption of their product. The organisation will take all efforts to identify, monitor and reduce the hazards associated with allergens.

Packaging must be labelled with an allergen warning where required.

15. Environment, Grounds, Services & Buildings

Requirements

The organisation will ensure the plant; premises and its surrounds pose no immediate threat to the quality or safety of the product or service offered.

To ensure the hazards are reduced or eliminated, a procedure will be developed, documented and implemented to cover the following:

- **Status of exterior building and surrounds, including areas of harbourage for pests, siting of waste control, litter control, loading and delivery dock areas**
- **Status of walls, drains, floors and ceilings, amenities, lighting, footbaths, etc**
- **Status of ventilation, fork lifts, service piping, water, etc**
- **Site security - visitors, sub-contractors, ex-employees**

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

The organisation must identify any risks introduced by the premises and its surrounds. Often the area chosen for the construction of a manufacture plant should be assessed.

Neighbours, water, gas, electricity, transport and accessibility affect the quality and safety of products.

The organisation must ensure that the premises meet local building standards and any other industry requirement. The placement of fittings, services and plant should aid in the cleaning and housekeeping of the site and reduce the likelihood of harbourage of pests and foreign contamination.

There must be adequate facilities for the storage of chemicals, materials and product to ensure quality and safety. Personnel should be allocated adequate areas for changing, cleaning and eating. Amenities must be sanitary and accessible; ensuring that access route to these does not cause cross contamination to other people, processes or product.

Where problems are identified from the inspection of these requirements, corrective action must be undertaken and documented.

16. Preventive Maintenance

Requirements

To ensure that all plant, premises and equipment are in a condition that does not present a hazard to food quality and safety, the organisation will develop, document and implement a preventive maintenance program.

The procedure shall include the following:

- **Equipment and building maintenance repair procedures**
- **Non-routine maintenance**
The organisation must ensure that all plant and equipment is maintained to avoid compromising the quality and safety of the product. Where non-routine or breakdown maintenance occurs corrective action should be taken and recorded. A schedule will be developed outlining the equipment for routine maintenance, the type of maintenance and the materials required for maintenance.
- **Work order system in place, including disposition of ingredients and work in-progress in the event of unscheduled maintenance**
A system will be developed to prioritise the maintenance required. Where production shall be affected as a result of the routine and non-routine maintenance, procedures shall be developed to handle materials, in-progress and finished product.
- **Controls for maintenance equipment including hot and cold equipment, cooking and cooling equipment, pressurised equipment, etc**
Where specialised handling is required for the maintenance of equipment, this shall be documented in the procedure.
- **Record keeping**
Records will need to be established to capture the work undertaken on premises, plant and equipment. This will be reviewed routinely to analyse any potential concerns with equipment capability or maintenance/breakdown trends occurring.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Preventive maintenance reduces the likelihood of equipment, premises and plant affecting the production of the product.

Breakdowns can mean a halt to a process which could potentially compromise the product quality and safety and procedures should be written to handle this situation. It should identify who is contacted, what happens to work-in-progress, how it is identified and how the problem is determined and rectified.

When performing routine maintenance, consideration must be given to the types of lubricants, additives and chemicals used for service. Tools used and any by-product generated from servicing should be addressed.

Chemicals used by maintenance, that contact food directly or indirectly must be food grade. Material Safety Data Sheets need to be available to show that these chemicals are appropriate and how they should be handled and stored.

Preventive maintenance records help to establish trends when allocating budgets, equipment and personnel to functions of manufacture. It also provides objective evidence to external auditors that maintenance can be controlled and is effective.

17. Recall Procedures

Requirements

The organisation must develop an appropriate product recall procedure for all product that is outside the control of the consumer, based on FSANZ recall protocol.

The procedure shall include the following:

- **Written procedures for both product withdrawal and product recall**
The procedure will identify the difference between a product withdrawal and a product recall. It shall identify the people responsible for investigation, how it is investigated and how it shall be handled.
- **Internal responsibility and external notification lists and 24hr contacts**
People who are directly responsible for conducting a recall or withdrawal, notifying authorities and conducting an assessment must be listed with contact numbers.
- **Contact details for Spotless & Government Authorities**
- **Recall procedure including mock recalls**
- **Record keeping**
The organisation will ensure that the recall procedure is effective by performing a mock recall at least annually.

All activities relating to a recall or withdrawal will be documented and reviewed to determine its effectiveness. Records must document who was contacted, what the problem was, who acted upon it and how it was resolved.

The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification, recall and any subsequent actions shall be kept.

Reasoning

A product recall procedure is the last action an organisation can take to protect its consumers from any potential or imminent harm. A recall can also protect an organisations image from faulty or affected product, that does not present a harm to the consumer.

Product recalls can be generated because of a quality or safety issue.

The organisation must appoint a team to appropriately handle a recall. This team must be suitably skilled or trained to handle the recall and any potential media liaisons.

By testing the system with a mock recall, the organisation can ensure that the recall or withdrawal is timely, efficient and minimises harm to both the consumer and the organisation.

Product recall can be tested from the raw material back to the supplier, from the raw material forward to the customer and from the customer back to the raw material and supplier.

The product recall system can be modelled on a recognised industry guideline, such as the Food Standards Australia New Zealand (FSANZ) Product Recall Guidelines.

It should describe who is notified in the event of a recall and how the media is to be included, where necessary. Often the recall can be conducted without the need to inform the media or other authorities of the action.

18. Evidence of Commitment to Continuous Improvement

Requirements

The organisation must recognise that the systems for quality and safety are continuously changing and continuous improvement is necessary.

A procedure shall be developed, documented and implemented to demonstrate how the company undergoes review.

The procedure shall include:

- **Regular reviews to demonstrate continuous improvement.**
The procedure will ensure that activities are in place to verify the effectiveness of the procedure and to correct any problems that are identified. This can be done by developing checklists, compiling statistics, and conducting internal audits or other such method. Any verification activity must be routinely conducted. This routine shall be developed and documented, preferably within the verification schedule.

Records of the verification and any corrective actions shall be kept.

Reasoning

Quality and safety is not stagnant, as processes, products and equipment change and the system must change to encompass these innovations.

An organisation should routinely inspect its own processes to assess if they are appropriate and effective. All reviews should be performed by adequately skilled or trained employees. The frequency of review will be determined by the complexity of the procedure and the level of risk to the quality and safety of the product.

Where a problem is identified as a result of the review activities, these shall be appropriately actioned and recorded.

Any reviews or corrective actions shall be presented to management or other staff with executive responsibility for review.