

## SALSA (Issue 6) to BRCGS Global Standard START! (Issue 2) Transition Tool (F930)

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Document Scope: This document provides a tool to help sites transition from SALSA Food & Drink Production Standard (Issue 6) certification to BRCGS Global Standard START! (Issue 2) Intermediate certification. This tool can also be used by auditors for guidance.

Change log:

Version no.	Date	Description
1	03/06/2024	First version.

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Version 1

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## 1 Introduction

Welcome to the SALSA to START! Transition tool. Sites will find this useful when preparing to transition from SALSA to START! Intermediate level. START! Basic level requirements are very similar to SALSA and therefore we have not focused or included “Basic only” requirements in this tool.

It is essential to highlight that sites must ensure they comply with all requirements outlined in the START! Standard to achieve certification and not only the requirements listed in this tool. This tool is not a checklist. Where we refer to START! in this document we are referring to Global Standard START! (Issue 2) Intermediate requirements. Where we refer to SALSA – we are referring to SALSA Food & Drink Production Standard (Issue 6) requirements.

This transition tool is the outcome of a gap analysis conducted between SALSA and BRCGS. The gap analysis was conducted to determine the differences between the two standards.

This document has been agreed by both parties and provides guidance for sites wishing to transition from SALSA to the START! Intermediate level by helping them to assess their operations against the requirements and prepare for a certification audit.

Auditors may also find this document useful when auditing a site which is in the process of transitioning from SALSA to START! Intermediate level.

### 1.1 How to use the Transition Tool

This tool is designed to help assess a site's operations against the Intermediate level requirements of the START! programme when progressing from SALSA and to help prepare for a START! certification audit.

While this tool will be useful in preparing for a START! audit, it does not contain all the clauses in the Standard. It will not be accepted by auditors as evidence of an internal audit. It is the site's responsibility to ensure that they are prepared for their audit. This document should be seen as guidance only - providing a stepping stone to gain START! Intermediate level certification.

Completing this transition tool may help sites to be aware of any challenges which may affect their ability to progress from SALSA to START!.

### 1.2 Further Information

#### SALSA

Launched in 2007, SALSA is a food safety certification scheme for the UK's small food and drink producers. The SALSA standard supports producers in implementing practices and controls to produce consistently safe food by providing an audit that is appropriate and proportionate to their activities.

The SALSA standard is written by experienced food safety experts to reflect the legal requirements of UK food producers and suppliers and the enhanced expectations of 'best practice' of professional food buyers.

Self-funding, SALSA is a not-for-profit organisation intended to be affordable for smaller businesses. SALSA is a joint venture between three of the major trade associations representing the UK food chain:

- The Food and Drink Federation (FDF)
- The National Farmers Union (NFU)
- UK Hospitality (UKH)

The Institute of Food Science & Technology (IFST) moderates the scheme on behalf of the joint venture owners.

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For further information about the SALSA Food & Drink Production Standard, please visit the website.

[SALSA \(salsafood.co.uk\)](https://salsafood.co.uk)

## BRCGS

BRCGS is the leading provider of global supply chain assurance standards recognised by thousands of customers worldwide. BRCGS:

- is a GFSI market leader
- gives results you can trust
- offers the most rigorous schemes
- provides the best auditors

BRCGS was founded in 1996 by retailers who wanted to harmonise food safety standards across the supply chain. Today we are globally recognised across both food and non-food categories and operate third-party certification schemes across areas such as food, packaging materials and distribution. Our message is clear, we have the most rigorous schemes and the highest trained auditors giving you the best results possible.

The START! programme recognises and encourages the development of food safety systems in small sites where food safety management systems are immature. It has been developed in line with the full Global Standard Food Safety.

BRCGS START! gives you a clear path towards improved food safety standards as you grow.

For further information about the BRCGS START! programme, please visit the website.

[BRCGS \(brcgs.com/our-standards/start\)](https://brcgs.com/our-standards/start)

If sites have any further questions about the SALSA to BRCGS Transition Tool or BRCGS Global Standard START!, please do not hesitate to contact the team.

Email – [brcgs.enquiries@lgcgroup.com](mailto:brcgs.enquiries@lgcgroup.com)

The information in this document supersedes any previously published documents.

## 2 Requirements

The clauses listed in this document are the START! Intermediate level requirements that are not included or are only partially included in SALSA. A site will have to achieve compliance to all these requirements if transitioning from SALSA to START certification. Sites must therefore focus on these requirements to progress from being SALSA certificated to becoming START! certificated.

As an aid, the START! clauses are identified as 'Basic and Intermediate' or as 'Intermediate only'. This document does not include clauses identified for the Basic level only. The difference between the levels is outlined below.

START! Level	Description
<b>Basic and intermediate</b>	START! Basic level and START! Intermediate level requirements.
<b>Intermediate only</b>	START! Intermediate level requirements only, clauses are generally more challenging to evidence or comply with.

<b>1</b>	<b>Senior management commitment</b>		
<b>1.1</b>	<b>Senior management commitment and continual improvement</b>		
<b>Statement of intent</b>	The site's senior management shall demonstrate they are fully committed to the implementation of the requirements of the START! programme and to processes which facilitate continual improvement of food safety and quality management and the site's food safety and quality culture.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>1.1.1 Basic and Intermediate</b>	<p>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:</p> <ul style="list-style-type: none"> <li>signed by the person with overall responsibility for the site</li> <li>communicated to all staff.</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>be signed by the person with overall responsibility for the site</li> <li>be communicated to all staff</li> </ul>		

	<ul style="list-style-type: none"> <li>include commitment to continuously improve the site's food safety and quality culture.</li> </ul>		
<b>1.1.2</b> <b>Intermediate only</b>	<p>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. The plan shall include measures needed to achieve a positive culture change.</p>		
<b>1.1.3</b> <b>Basic and intermediate</b>	<p>The site's senior management shall ensure that clear objectives are defined to maintain and improve the safety, authenticity, legality and quality of products manufactured, in accordance with the food safety and quality policy and the START! programme.</p>		
<b>1.1.4</b> <b>Intermediate only</b>	<p>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 START! programme and objectives set in clause 1.1.3.</p>		
<b>1.1.7</b> <b>Basic and intermediate</b>	<p>The company's senior management shall provide the human and financial resources required to produce safe, authentic, legal products to the specified quality and in compliance with the requirements of the START! programme.</p>		
<b>1.1.8</b> <b>Intermediate only</b>	<p>The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews:</p> <ul style="list-style-type: none"> <li>scientific and technical developments</li> <li>industry codes of practice</li> <li>new risks to authenticity of raw materials</li> <li>all relevant legislation in the country where the product will be sold (where known).</li> </ul> <p>The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews relevant food safety legislation applicable to the production site and as applicable in the country where the product is intended for sale.</p>		
<b>1.1.11</b> <b>Basic and intermediate</b>	<p>The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the START! programme. Relevant departmental managers or their</p>		

	deputies shall be available as required during the audit.		
<b>1.1.12</b> <b>Basic and intermediate</b>	The site's senior management shall ensure that the root causes of any non-conformities against the START! programme identified at the previous audit have been effectively addressed to prevent recurrence.		
<b>1.2</b>	<b>Organisational structure, responsibilities and management authority</b>		
<b>Statement of intent</b>	The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>1.2.1</b> <b>Basic and intermediate</b>	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, authenticity, 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.		
<b>1.2.2</b> <b>Intermediate only</b>	The site's senior management shall ensure that all employees are aware of their responsibilities and work in accordance with site policies, procedures, work instructions and existing practices for activities undertaken.		
<b>1.2.4</b> <b>Basic and intermediate</b>	If the site does not have the appropriate in-house knowledge of food safety, authenticity, legality or quality, external expertise (e.g. food safety consultants) may be used; however the day-to-day management of the food safety systems shall remain the responsibility of the company.		
<b>2</b>	<b>The food safety plan – HACCP</b>		
<b>Statement of intent</b>	The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP principles.		
<b>2.4</b>	<b>Identify intended use (equivalent to Codex Alimentarius Step 3)</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>2.4.1</b> <b>Basic and intermediate</b>	The intended use of the product by the customer, and expected 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).		

2.5 Construct a process flow diagram (equivalent to Codex Alimentarius Step 4)			
Clause/Level	Requirements	Conforms	Comments
2.5.1 Basic and intermediate	<p>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.</p> <p>As a guide, this should include the following, although this is not an exhaustive list:</p> <ul style="list-style-type: none"> <li>• plan of premises and equipment layout</li> <li>• raw materials, including introduction of utilities and other contact materials (e.g. water, packaging)</li> <li>• sequence and interaction of all process steps</li> <li>• outsourced processes and subcontracted work</li> <li>• potential for process delay</li> <li>• rework and recycling</li> <li>• low-risk/high-risk/high-care area segregation</li> <li>• finished products, intermediate/semi-processed products, by-products and waste.</li> </ul>		
2.6 Verify flow diagram (equivalent to Codex Alimentarius Step 5)			
Clause/Level	Requirements	Conforms	Comments
2.6.1 Intermediate only	<p>The HACCP food safety team shall verify the accuracy of the flow diagrams by on-site audit at least annually, and whenever there are changes to the process, to ensure any changes have been considered as a part of the HACCP or food safety plan. Records of verified flow diagrams shall be maintained.</p>		
2.8 Determine the critical control points (CCPs) (equivalent to Codex Alimentarius Step 7, Principle 2)			
Clause/Level	Requirements	Conforms	Comments
2.8.1 Intermediate only	<p>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.</p>		



<b>2.10 Establish a monitoring system for each CCP (equivalent to Codex Alimentarius Step 9, Principle 4)</b>			
Clause/Level	Requirements	Conforms	Comments
<b>2.10.1</b> <b>Intermediate only</b>	<p>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:</p> <ul style="list-style-type: none"> <li>• online measurement</li> <li>• offline measurement</li> <li>• continuous measurement (e.g. thermographs, pH meters etc.).</li> </ul> <p>Where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product.</p>		
<b>2.11 Establish a corrective action plan (equivalent to Codex Alimentarius Step 10, Principle 5)</b>			
Clause/Level	Requirements	Conforms	Comments
<b>2.11.1</b> <b>Intermediate only</b>	<p>The HACCP food safety team shall specify and document the corrective actions to be taken when monitored results indicate a failure to meet a critical limit or when monitored results indicate a trend towards a 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.</p>		
<b>2.12 Validate the HACCP plan and establish verification procedures (equivalent to Codex Alimentarius Step 11, Principle 6)</b>			
Clause/Level	Requirements	Conforms	Comments
<b>2.12.2</b> <b>Intermediate only</b>	<p>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.</p> <p>Examples of verification activities include:</p> <ul style="list-style-type: none"> <li>• internal audits</li> <li>• review of records where acceptable limits have been exceeded</li> <li>• review of complaints by enforcement authorities or customers</li> <li>• review of incidents of product withdrawal or recall.</li> </ul>		

	Results of verification shall be recorded and communicated to the HACCP food safety team.		
<b>3</b>	<b>Food safety and quality management system</b>		
<b>3.5.3</b>	<b>Management of suppliers of services</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>3.5.3.1</b>  <b>Basic and Intermediate</b>	<p>Examples of services to consider:</p> <ul style="list-style-type: none"> <li>• pest control</li> <li>• laundry services</li> <li>• contracted cleaning</li> <li>• contracted servicing and maintenance of equipment</li> <li>• transport and distribution</li> <li>• off-site storage of ingredients or packaging (other than at the supplier's facilities) prior to delivery to the site</li> <li>• off-site packing of products</li> <li>• laboratory testing</li> <li>• catering services</li> <li>• waste management</li> <li>• providers of product safety training</li> <li>• product safety consultants</li> </ul>		
<b>3.5.4</b>	<b>Management of outsourced processing</b>		
<b>Statement of intent</b>	Where any intermediate process step (including production, processing or storage) 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 product safety, legality, quality or authenticity of the product.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>3.5.4.1</b>  <b>Intermediate only</b>	The company shall be able to demonstrate that, where part of the production process (i.e. any intermediate process step) is outsourced or undertaken off-site, and subsequently returned to the site, this has been declared to the customer and, where required, approval granted.		
<b>3.5.4.5</b>  <b>Basic and Intermediate</b>	<p>Any outsourced processing operations shall:</p> <ul style="list-style-type: none"> <li>• be undertaken in accordance with established contracts which clearly define any processing requirements</li> <li>• maintain product traceability.</li> </ul>		
<b>3.6</b>	<b>Specifications</b>		
<b>Statement of intent</b>	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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>

<b>3.6.3</b> <b>Intermediate only</b>	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.		
<b>3.10</b>	<b>Complaint-handling</b>		
<b>Statement of intent</b>	Customer complaints shall be handled effectively and information used to reduce recurring complaint levels.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>3.10.2</b> <b>Intermediate only</b>	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.		
<b>4</b>	<b>Site standards</b>		
<b>4.2</b>	<b>Food defence</b>		
<b>Statement of intent</b>	Systems shall protect products, premises and brands from malicious actions while under the control of the site.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.2.4</b> <b>Intermediate only</b>	Areas where a significant risk is identified shall be defined in the food defence plan, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging).  Staff shall be trained in food defence procedures.		
<b>4.4</b>	<b>Building fabric, raw material handling, preparation, processing, packing and storage areas</b>		
<b>Statement of intent</b>	The fabrication of the site, buildings and facilities shall be suitable for the intended purpose.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.4.7</b> <b>Basic and Intermediate</b>	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.		
<b>4.4.8</b>	Doors (both internal and external) shall be maintained in good condition.		

<b>Basic and Intermediate</b>	At a minimum: <ul style="list-style-type: none"> <li>external doors and dock levellers shall be close fitting or adequately proofed</li> <li>external doors to open product areas shall not be opened during production periods except in emergencies</li> <li>where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.</li> </ul>		
<b>4.4.9 Basic and Intermediate</b>	Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.		
<b>4.4.10 Basic and Intermediate</b>	Adequate ventilation and extraction shall be provided in product storage and processing environments to prevent condensation or excessive dust.		
<b>4.4.11 Basic and Intermediate</b>	Where plastic strip curtains are present, these shall be maintained in good condition, clean, fitted correctly (e.g. to prevent pest ingress or for temperature control), and shall not pose a food safety risk.		
<b>4.6</b>	<b>Equipment</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>Statement of intent</b>	All production and product-handling equipment shall be suitable for the intended purpose and shall be used to minimise the risk of contamination of product.		
<b>4.6.5 Intermediate only</b>	Food contact equipment that has been stored but is not in daily use shall be cleaned and, where necessary, disinfected prior to use.		
<b>4.7</b>	<b>Maintenance</b>		
<b>Statement of intent</b>	An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.7.3 Intermediate only</b>	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.		

<b>4.7.5</b> <b>Intermediate only</b>	Materials and parts used for equipment and plant maintenance shall be of an appropriate grade or quality.		
<b>4.8</b>	<b>Staff facilities</b>		
<b>Statement of intent</b>	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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.8.6</b> <b>Basic and Intermediate</b>	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.		
<b>4.9</b>	<b>Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas</b>		
<b>Statement of intent</b>	Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product.		
<b>4.9.2</b>	<b>Metal control</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.9.2.2</b> <b>Basic and Intermediate</b>	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.		
<b>4.9.3</b>	<b>Glass, brittle plastic, ceramics and similar materials</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.9.3.4</b>	Where they pose a risk to product, glass windows shall be protected against breakage.		

<b>Basic and Intermediate</b>			
<b>4.9.3.5</b> <b>Intermediate only</b>	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.		
<b>4.10</b>	<b>Foreign-body detection and removal equipment</b>		
<b>Statement of intent</b>	The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies		
<b>4.10.1</b>	<b>Selection and operation of foreign-body detection and removal equipment</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.10.1.4</b> <b>Basic and Intermediate</b>	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.		
<b>4.10.2</b>	<b>Filters and sieves</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.10.2.1</b> <b>Basic and Intermediate</b>	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.		
<b>4.10.2.2</b> <b>Basic and Intermediate</b>	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.		
<b>4.10.3</b>	<b>Metal detectors and X-ray equipment</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.10.3.2</b> <b>Basic and Intermediate</b>	The metal detector or X-ray equipment shall incorporate one of the following: <ul style="list-style-type: none"> <li>an automatic rejection device, for continuous in-line systems, which shall divert contaminated product either out of the product flow or to a secure unit accessible only to authorised personnel</li> </ul>		

	<ul style="list-style-type: none"> <li>a belt stop system with an alarm where the product cannot be automatically rejected (e.g. for very large packs)</li> <li>in-line detectors which identify the location of the contaminant to allow effective segregation of the affected product.</li> </ul>		
<b>4.10.6</b>	<b>Container cleanliness – glass jars, cans and other rigid containers</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.10.6.1</b> <b>Basic and Intermediate</b>	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.		
<b>4.10.7</b>	<b>Other foreign-body detection and removal equipment</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.10.7.1</b> <b>Basic and Intermediate</b>	Other foreign-body detection and removal equipment, such as gravity separation, fluid bed technology or aspirators, shall be checked in accordance with the manufacturer's instructions or recommendations.  Checks shall be documented.		
<b>4.11</b>	<b>Housekeeping and hygiene</b>		
<b>Statement of intent</b>	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.		
<b>4.11.7</b>	<b>Cleaning in place (CIP)</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.11.7.3</b> <b>Intermediate only</b>	The CIP equipment shall be maintained by suitably trained staff to ensure effective cleaning is carried out.		
<b>4.11.7.4</b> <b>Intermediate only</b>	CIP facilities, where used, shall be monitored at a defined frequency based on risk.		
<b>4.14</b>	<b>Pest management</b>		

<b>Statement of intent</b>	The whole site shall have an effective preventive pest management programme in place to minimise the risk of pest presence 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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.14.1</b> <b>Basic and Intermediate</b>	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 management programme to eliminate or manage the infestation so that it does not present a risk to products, raw materials or packaging.		
<b>4.14.3</b> <b>Basic and Intermediate</b>	Where a site undertakes its own pest management, it shall be able to effectively demonstrate that: <ul style="list-style-type: none"> <li>• 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</li> <li>• staff undertaking pest management activities meet any legal requirements for training or registration</li> <li>• sufficient resources are available to respond to any infestation issues</li> <li>• there is ready access to specialist technical knowledge when required</li> <li>• legislation governing the use of pest control products is understood and complied with</li> <li>• dedicated locked facilities are used for the storage of pesticides.</li> </ul>		
<b>4.15</b>	<b>Storage facilities</b>		
<b>Statement of intent</b>	All facilities used for the storage of raw materials, packaging, in-process products and finished products shall be suitable for purpose.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.15.4</b> <b>Basic and Intermediate</b>	Where controlled atmosphere storage is required, the storage conditions shall be specified and effectively controlled. Records shall be maintained of the storage conditions.		
<b>4.15.5</b>	Where storage outside is necessary, items shall be protected from contamination and deterioration. Items shall be checked for		



<b>Basic and Intermediate</b>	suitability before being brought into the factory.		
<b>4.16</b>	<b>Dispatch and transport</b>		
<b>Statement of intent</b>	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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>4.16.4</b>  <b>Basic and Intermediate</b>	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.		

<b>5</b>	<b>Product control</b>		
<b>5.1</b>	<b>Product design/development</b>		
<b>Statement of intent</b>	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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>5.1.2</b>  <b>Intermediate only</b>	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 team 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.		
<b>5.4</b>	<b>Product authenticity, claims and chain of custody</b>		
<b>Statement of intent</b>	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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>5.4.5</b>  <b>Intermediate only</b>	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.  The facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims.		

<b>5.5</b>	<b>Product packaging</b>		
<b>Statement of intent</b>	Product packaging and processes for the purchase of product packaging shall be appropriate for the intended use. Packaging shall be stored under conditions to prevent contamination and minimise deterioration.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>5.5.2</b>  <b>Basic and Intermediate</b>	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.		
<b>5.6</b>	<b>Product inspection, on-site product testing and laboratory testing</b>		
<b>Statement of intent</b>	The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, authenticity, legality and quality, using appropriate procedures, facilities and standards.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>5.6.2</b>  <b>Intermediate only</b>	<p>Test and inspection results shall be recorded and reviewed regularly to identify trends.</p> <p>The significance of on-site and laboratory results shall be understood and acted upon accordingly. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.</p> <p>Where legal limits apply, these shall be understood and appropriate action taken promptly to address any exceedance of these limits.</p> <p>Where applicable, the measurement uncertainty associated with laboratory test results shall be considered.</p>		
<b>5.6.3</b>  <b>Basic and Intermediate</b>	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.		
<b>5.6.4</b>  <b>Intermediate only</b>	Pathogen testing (including pathogens tested as part of the site's environmental monitoring programme) 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 contamination of products or production areas.		

<b>5.6.5</b> <b>Basic and Intermediate</b>	Where testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety.		
<b>5.7</b>	<b>Product release</b>		
<b>Statement of intent</b>	The site shall ensure that finished product is not released unless all agreed procedures have been followed.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>5.7.1</b> <b>Basic and Intermediate</b>	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.		
<b>6</b>	<b>Process control</b>		
<b>6.2</b>	<b>Labelling and pack control</b>		
<b>Statement of intent</b>	The management controls of product labelling activities shall ensure that products will be correctly labelled and coded.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>6.2.3 Basic and Intermediate</b>	<p>Procedures shall be in place to ensure that all products are packed into the correct packaging and correctly labelled.</p> <p>Procedures shall include checks:</p> <ul style="list-style-type: none"> <li>• at the start of packing</li> <li>• during the packing run</li> <li>• when changing batches of packaging materials</li> <li>• at the end of each production run.</li> </ul> <p>The checks shall also include verification of any printing carried out at the packing stage including, as appropriate:</p> <ul style="list-style-type: none"> <li>• date coding</li> <li>• batch coding</li> <li>• quantity indication</li> <li>• pricing information</li> <li>• bar coding</li> <li>• country of origin</li> <li>• allergen information</li> </ul>		
<b>7</b>	<b>Personnel</b>		
<b>7.1</b>	<b>Training: raw material handling, preparation, processing, packing and storage areas</b>		

<b>Statement of intent</b>	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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>7.1.1</b> <b>Basic and Intermediate</b>	All personnel, including agency-supplied staff, temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.		
<b>7.1.4</b> <b>Basic and Intermediate</b>	All 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.		
<b>7.2</b>	<b>Personal hygiene: raw material handling, preparation, processing, packing and storage areas</b>		
<b>Statement of intent</b>	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.		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>7.2.3</b> <b>Basic and Intermediate</b>	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.		
<b>8</b>	<b>High-risk, high-care and ambient high-care</b>		
<b>Clause/Level</b>	<b>Requirements</b>	<b>Conforms</b>	<b>Comments</b>
<b>Statement of intent</b>	The site shall be able to demonstrate that production facilities and controls are suitable to prevent pathogen contamination of products.		