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● **Next steps:
Implementing new additional
requirements for FSSCv6**

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2.5.1 Management of services & purchased materials

- ✓ Category FII also needs a documented procedure detailing procurement in emergency situations (*Retail, wholesale & E-commerce*)
- ✓ Policy for procurement of animals, fish & seafood subject to control of prohibited substances covers categories **CO**, **CI**, **CIII** & **CIV**
- ✓ Specification review process covers **raw material** and **finished products** for food safety, **quality**, legal and customer requirements for categories **C**, **D**, **I**, **FII**, **G** and **K**
 - ✓ *Frequency of review not specified*
- ✓ Requirements for **category I** added to **establish criteria for the use of recycled packaging as a raw material into the production of finished packaging**



Recycling processes may increase the levels of chemicals in packaging, and this may present a migration risk to the consumer

2.5.2 Product labelling & printed materials: c) Claims

Claims need validation to demonstrate the accuracy and integrity of the claim



Allergen claims

Validation data may include:

- ✓ Raw material specifications
- ✓ Formulation / recipe

Verification data may include:

- ✓ Cleaning & changeover protocols
- ✓ Product release protocols
- ✓ Finished product allergen screening
- ✓ Traceability



Raw material status

Validation data may include:

- ✓ Certification to specific raw material programs
- ✓ Raw material specifications
- ✓ Formulation / recipe

Verification data may include:

- ✓ Traceability
- ✓ Mass balance

2.5.2 Product labelling & printed materials: d) artwork & print control – Category I

Procedure for approval of artwork standard or master
Processes to manage:

- ✓ Changes to artwork & print specifications
- ✓ Obsolete materials
- ✓ Approval of print runs against agreed standard
- ✓ Detection & identification of printing errors during run
- ✓ Effective segregation of different print variants
- ✓ Account for any unused printed products

Consider:

- ✓ *How is this currently done?*
- ✓ *Do we need to make changes to improve our processes?*
- ✓ *What evidence of compliance could you show for this?*



2.5.3 Food defense



- ✓ Documented threat assessment
- ✓ Define **methodology** (SSAFE, PAS 96, FDA)
- ✓ **Determine priority** of potential threats linked to processes and products within FSSC scope
- ✓ Implement **appropriate mitigation measures**
- ✓ Food defense plan based on threat assessment with mitigation measures and **verification procedures**

- ✓ Food defense plan:
 - ✓ **Implemented**, supported by FSMS
 - ✓ Compliant with legislation
 - ✓ **Covers process & products within scope**
- ✓ FSSC Guidance Document on Food Defense

Category FII to ensure their **suppliers have a food defense plan in place**

2.5.4 Food fraud mitigation

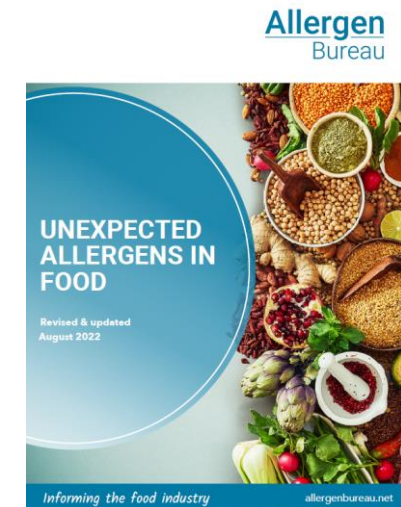
- ✓ Documented food fraud vulnerability assessment
- ✓ Define **methodology** used
- ✓ **Determine priorities** for processes and products
- ✓ Implement **appropriate mitigation measures**
- ✓ Food fraud mitigation plan based on vulnerability assessment with mitigation measures and **verification procedures**
- ✓ Food fraud mitigation plan:
 - ✓ **Implemented**, supported by FSMS
 - ✓ Compliant with legislation
 - ✓ **Covers process & products within scope**
- ✓ FSSC Guidance Document on Food Fraud Mitigation

Category FII to ensure their **suppliers have a food fraud mitigation plan in place**



2.5.6 Management of allergens a – d)

- ✓ **List of all allergens handled on site**
 - ✓ Raw materials, WIP, and finished products
 - ✓ Also consider NPD, vending machines and competitor samples
 - ✓ *Physically walk through all raw material and finished product storage areas to challenge list of allergens*
- ✓ Control measures to be based on the outcome of the allergen risk assessment
- ✓ Validation and verification of controls
 - ✓ **Specific verification testing for allergen cross-contamination** when products with different allergen profiles produced in same area
 - ✓ *Check production schedules to confirm/challenge product segregations in processing area*
 - ✓ **Frequency** of verification testing **based on risk**
 - ✓ **Type of verification** testing may include contact surfaces, product and air testing for airborne contamination



2.5.6 Management of allergens e - f)

Precautionary statements are not an excuse for poor GMP



Precautionary / warning labels

- ✓ Only used when **outcome of the risk assessment identifies allergen cross contamination** risk to consumer
 - ✓ Refer to allergen thresholds (eg. VITAL)
- ✓ Not to be used instead of **necessary allergen controls or verification testing**
- ✓ All personnel to be **trained in allergen awareness**
- ✓ **Specific training** for allergen controls relevant to work tasks
 - ✓ Allergen changeover protocols
 - ✓ Allergen cleaning
 - ✓ Allergen swab/protein tests
- ✓ **Annual review** of allergen management plan or following significant change impacting food safety, recall / withdrawal or when industry trends indicate contamination of similar products

2.5.7 Environmental monitoring

Risk-based environmental monitoring program for relevant pathogens, spoilage and indicator organisms

Procedure to evaluate effectiveness of all controls in compliance with legal and customer requirements

Data and trend analysis of environmental monitoring activities

Annual review or when significant changes, no positive test results obtained over a period of time, trend in out of spec, repeat pathogen detections, alerts or recalls

Health

How did US baby formula get contaminated with dangerous bacteria?



2.5.8 Food safety & quality culture

PAS 320:2023
Developing and sustaining a mature food safety culture – Guide



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Senior management establish, implement and maintain food safety and quality culture objectives

Inclusive of communication, training, employee feedback and engagement and performance measurement

Documented food safety and quality culture plan

Targets and timelines included in management review and continuous improvement



2.5.9 Quality control

Quality parameters & quality control procedures

- Quality policy and objectives
- Quality parameters for all products in scope
Analysis and evaluation of results of quality control parameters
- Inclusion of quality elements in internal audit program

QC procedures Line start-up & change-over

- QC procedures for unit, weight and volume to meet customer and legal requirements
- Line start up and changeover procedures
- Controls to ensure labelling and packaging from previous run are removed from the line

2.5.10 Transport, storage and warehousing

- Stock rotation
- Category C0 post slaughter time and temperature requirements
- Category FI transport and delivered of food under conditions to minimise potential for contamination
- Requirements for cleaning of transport tankers
 - Transportation of finished products
 - Receiving of raw materials



2.5.11 Hazard control and measures to prevent cross-contamination

Categories BIII, C & I

- Requirements for packaging that imparts or provides a functional effect on food

Category C0

- Requirements for inspection process at lairage and/or evisceration

Category D

- Procedures to manage use of ingredient/additives that can have adverse animal health impact

All categories excluding FII

- Risk assessment to determine need for and type of foreign body detection equipment
- Procedure for the management and use of the selected equipment
- Controls for foreign matter / breakage controls for metal, ceramic, brittle materials

2.5.13 Product design and development

Process for ongoing shelf-life verifications with frequency based on risk

Validate cooking instructions for ready to cook products

ALL NATURAL INGREDIENTS. MADE WITH 100% FISH FILLETS. LOW IN SATURATED FAT.

COOKING INSTRUCTIONS

NOTE: This frozen product is uncooked. As cooking appliances vary, always ensure product is steaming hot and cooked through before serving.

OVEN BAKE

TEMPERATURE	TIME
200°C	18 minutes

1. Preheat oven to 200°C.
2. Place Frozen Birds Eye Fish on a baking paper lined tray.
3. Bake for 18 minutes, carefully turning after 9 minutes.

NUTRITION INFORMATION

PER 100g	PER 100g	PER 100g
ENERGY	1000kJ	600kJ
PROTEIN	21g	12.5g
FAT, TOTAL	12.4g	6.5g
- SATURATED	1.5g	0.7g
- TRANS	0.0g	0.0g
- MONOSATURATED	1.4g	2.4g
- CHOLESTEROL	22mg	12mg
- SODIUM	95mg	54mg
- SUGAR	0.2g	0.1g
- FIBRE	1.0g	0.5g
CARBOHYDRATE	2.0g	1.0g
- SUGAR	1.4g	0.7g
NET ENERGY	1.0g	0.5g
SODIUM	100mg	200mg

* MAKE LESS THAN.

INGREDIENTS

Wildfarm pullock or New Zealand haddock fillets (51%), Crumb-coating (49%) (wheat flour, water, canola oil, wheat starch, capicola starch, potato starch, salt, glucose, wheat gluten, chive flour, yeast, sugar, black pepper).
Contains fish and wheat.

ALTHOUGH CARE IS TAKEN TO REMOVE BONES FROM THIS PRODUCT, SOME BONES MAY REMAIN.

KEEP FROZEN
STORE AT OR BELOW MINUS 18°C

Packed in Australia from at least 40% Australian ingredients

2.5.15 Equipment management

Requires **purchase specifications** addressing hygienic design, legal and customer requirements, intended use and product handled by the equipment
Consider ease of cleaning in addition to efficiency

Supplier evidence of compliance to purchase specification

Risk-based change management process for new equipment and/or changes to existing equipment including commissioning

Possible effects of equipment on existing systems to be assessed with adequate control measures determined and implemented



Technology in Motion.

IS622-17 Rev.1 27/08/2018

CERTIFICATE OF COMPLIANCE MATERIALS INTENDED FOR FOOD CONTACT

EU

Herewith we declare that the polyurethane belts

ELA-Food

manufactured by ELATECH s.r.l., via Fonte Solforosa, 1 Val Brembilla (BG), Italy

comply with the requirements of the following regulations:

- 1935/2004 on materials and articles intended to come into contact with food as amended.
- 10/2011 relating to plastic materials and articles intended to come into contact with foodstuffs as amended
- 2023/2006, good practices of manufacturing materials and objects which come into contact with foods
- D.M. 21/3/1973 e D.M. 31/5/2016

According to the above-mentioned regulations, ELA-Food respects the overall and specific migration limits for 2 hours at 70°C with ethanol 10% V/V (food simulant A), acetic acid 3% w/V (Food simulant B) and vegetable oil (Food simulant D2, with fat acids distribution that respects the values reported in the Regulation 10/2011)

ELA-Food belts are suitable to be used in contact with oily, fat, aqueous and acidic foods

This declaration relates exclusively to the products specified herein in the state in which they are placed on the market and it ceases to be valid if the belts are reworked/modified by customers later.

This warranty and all responsibilities connected to it are according to ELATECH® s.r.l.'s conditions of sale. This certificate of compliance has a validity of 2 years

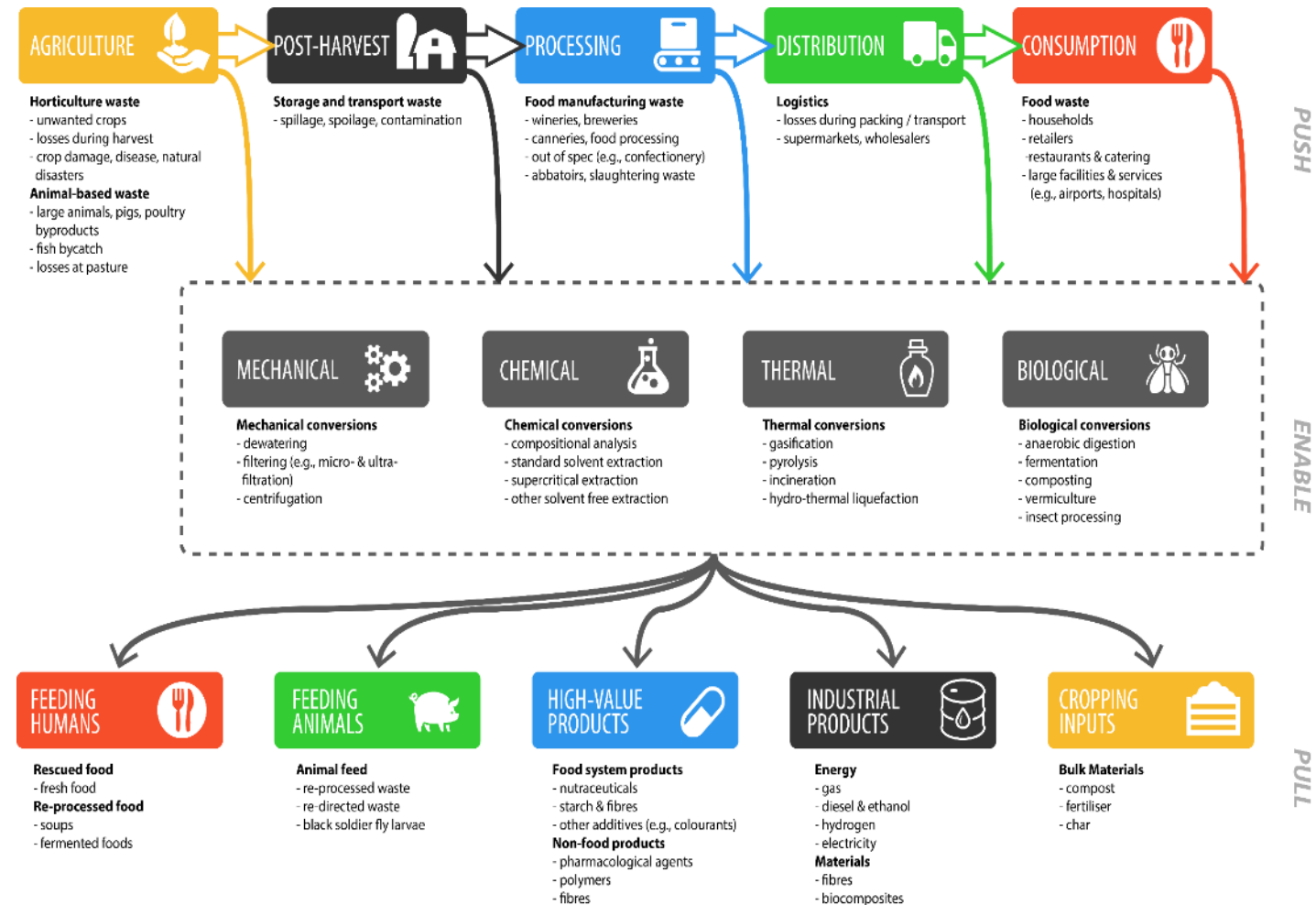
Issue Date 27/08/2018



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Cod.Fisc. e P.IVA IT02907330167 REA BG 341548 - Cap.Sociale (i.v.) € 99.000,00

2.5.16 Food loss and waste

- Policy and objectives detailing strategy to **reduce food loss and waste** within the organization and related supply chain
- Controls to manage products donated to food rescue organizations to ensure product safety is maintained
- Manage surplus products or by-products intended as animal feed/food to prevent contamination
- Comply with applicable legislation
- Food safety must be maintained



The aim is to reduce total food waste, not shift food waste from one part of the chain to another



2.5.17 Communication requirements

Add CB notification requirements to you emergency situation / recall protocols

Notify within 3 days for:

- Serious **events** impacting the FSMS, legality and/or integrity of certification
 - Natural or man made disasters
 - Cybersecurity breaches
- Serious **situations** where integrity of certification is at risk and/or the Foundation brought into disrepute
 - Public food safety events – recall, withdrawal, food poisoning outbreaks
 - Regulatory action against the business
 - Fraudulent activities and corruption

Key implementation tips

Think about the **intent** of each new requirement

- ✓ Why is this in the additional requirements?
- ✓ What do I need to do to comply?
- ✓ How can I demonstrate proof of compliance?

Breakdown the Scheme into requirements for:

- ✓ Documented procedures
- ✓ Risk based decisions
- ✓ Risk assessments
- ✓ Validation
- ✓ Verification
- ✓ Review

BSI courses for FSSC Understanding, Implementing, Internal Auditor and Lead Auditor have been revised for FSSCv6

