



***Perry Johnson Registrars Food Safety, Inc.***

# SQF Certification Procedure

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PJRFSI offers certification services to companies seeking independent validation of their SQF Food Safety and Quality Management System, a detailed and rigorous process. This procedure details from start to finish the life cycle of the SQF certification process.

## CONTENTS

1.	References .....	3
2.	Definitions .....	4
3.	Request for Certification .....	5
4.	Scheduling Audits .....	8
5.	The Document Audit .....	9
6.	The Onsite Facility Audit (Certification, Surveillance, and Recertification Audits).....	10
7.	The Use of Information Communication Technology (ICT) in the Audit Process.....	13
8.	Audit Reporting and the Certification Decision.....	14
9.	Maintaining Certification: Surveillance and Recertification Audits .....	16
10.	Unannounced Audit Protocol.....	18
11.	Conditions for Suspending or Withdrawing Certification .....	18
12.	Supplier Requirement to Notify PJRFSI of Special Situations .....	20
13.	Promotion of SQF Certification by Supplier .....	21
14.	Conditions for Change of Certification Body (Transfers) .....	21
15.	Disputes and Appeals .....	22
16.	Confidentiality .....	22
17.	Multi-site Organizations .....	22
18.	Contingency Management.....	22

## 1 References

- 1.1. ISO/IEC 17065: Conformity Assessment – Requirements for Bodies Certifying Products, Processes and Services (latest revision)
- 1.2. Criteria for SQF Certification Bodies (latest edition)
- 1.3. Criteria for SQF Auditors (latest edition)
- 1.4. SQF Code (latest edition)
- 1.5. SQFI Quality Shield and Logo Rules of Use (latest edition)
- 1.6. FS-1 – Food Safety Certification Questionnaire/Client Application
- 1.7. F-207 – PJRFSI Food Safety Quote Approval and Audit Duration Justification Checklist
- 1.8. FS-3sqf – SQF Certification Agreement
- 1.9. FS-3tc – Terms and Conditions
- 1.10. PFCsqf-AP – SQF Audit Package Component Identification Key
- 1.11. PFCsqf-TL – SQF Audit Status and Timeline Monitoring Guidance
- 1.12. F-71fs65 – Certification Personnel Statement of Availability Form
- 1.13. F-163fsi – Audit Scheduling Acknowledgement Form
- 1.14. F-27fsi – Auditor Assignment Form
- 1.15. WBfs65 – Auditor Workbook with Opening/ Closing Meeting Minutes
- 1.16. F-184fs65-A – Audit Plan Template
- 1.17. F-18fsi – Customer Satisfaction Survey
- 1.18. F-38fsi – Auditor Evaluation (Client Feedback Form)
- 1.19. F-67fs65 - Audit Package Review Form – Food Safety Programs
- 1.20. F-67fs65-A, Audit Report Review Form - Food Safety Programs
- 1.21. F-211 – Food Safety Programs Corrective Action Extension Request Form
- 1.22. F-212 – Corrective Action Worksheet for Special Audits
- 1.23. F-144fsi Transfer of Certification Body Checklist
- 1.24. FS-102 Scope Approval/Exclusion/Revision Form
- 1.25. FS-108ict Virtual Audit Questionnaire
- 1.26. FS-228sqf – SQF Risk Assessment Form
- 1.27. FS-229sqf - SQF Risk Assessment and Approval Form
- 1.28. SOP-03sqf – Procedure for Publicizing/Advertising SQF Certification and Use of Certification Marks
- 1.29. SOP-10 – Dispute/Appeal Procedure
- 1.30. SQF Document and Facility Audit Checklists (latest edition)
- 1.31. SQF Database and Web Application User Guides (latest edition)
- 1.32. PJView – Perry Johnson Registrars Food Safety, Inc. client database and project management system

## 2 Definitions

- 2.1 SQF Code - The HACCP-based food safety and quality management system certification program published and licensed by the Safe Quality Food Institute (SQFI), a division of the Food Marketing Institute (FMI).
- 2.2 Supplier - The organization seeking SQF certification. Until a certification agreement for certification services is signed with PJRFSI, the Supplier is initially referred to as the Applicant.
- 2.3 Scope of Certification – a description of the certification which is sought by the Supplier and will be detailed in the Certificate (see definition of Certificate for further details). The scope includes: the SQF certification code (manufacturing, packaging, quality etc); the site-specific facility(ies) covered; the individual product line(s)/type(s) processed at the facility(ies) from raw material receipt to shipment of finished product; and those products' applicable SQF food sector categories (FSC). The scope of certification also specifies exclusions, if any, which must be agreed and approved by PJRFSI in advance of the Facility Certification Audit. The Food Safety Program Accreditation Manager approves the exclusions through the FS-102 Scope Approval/Exclusion/Revision Form.
- 2.4 Site - A Supplier's single physical address or facility, or a group of related facilities as allowed by scope guidelines in the SQF Code and/or provided by SQFI, which will be audited and granted a certificate.

- 2.5 Certificate - Certification of SQF Systems by PJRFSI is not a statement that PJRFSI guarantees the safety of the Supplier's products and/or services, or that the Supplier and the Supplier's products and/or services meet all food safety regulations at all times. However, based upon the evidence reviewed and observed by PJRFSI's Auditor(s) at the time the assessment was conducted, a Certificate affirms that the Supplier's food safety plans, according to the Supplier's Scope of Certification, appear to have been implemented in accordance with the HACCP method and applicable regulatory requirements and that those plans appear to have been verified and determined effective to manage food safety. It is also a statement of the Supplier's commitment to: produce safe, quality food; comply with the requirements of the SQF Code; and comply with applicable food legislation.
- 2.6 SQF Practitioner – An employee of the Supplier who has the required HACCP training and SQF competence as well as authorization from the Supplier's top management to be responsible for the Supplier's SQF food safety and quality management system as it pertains to the certification process. The SQF Practitioner is PJRFSI's primary point of contact with the facility.
- 2.7 Auditor – an employee or contractor of PJRFSI who is registered with the SQF Institute as an SQF Auditor or Contract Auditor and further qualified by PJRFSI to conduct SQF certification audits.
- 2.8 Pre-assessment - An informal and optional facility evaluation carried out by PJRFSI to assess a Supplier's overall SQF System and to determine the Supplier's readiness for an SQF certification audit.
- 2.9 Document Audit — An onsite or offsite audit of the Supplier's SQF food safety program documentation and procedures. The Document Audit is also referred to as the Desk Audit, the Document Review, or the Stage 1 Audit. The Document Audit is the first part of the certification process and may be conducted onsite or offsite.
- 2.10 Facility Audit – An onsite audit of the Supplier's overall SQF food safety program and facility conducted by a PJRFSI auditor. The Facility Audit can refer to the second part of the initial certification audit, also called the Stage 2 Audit. It can also refer to a Surveillance or Recertification Audit. A Facility Audit is always conducted onsite.
- 2.11 Technical Reviewer – individuals who are competent to review audit results and render certification recommendations.
- 2.12 Designee – a PJRFSI employee who is designated and trained to complete specific procedural functions on behalf of another PJRFSI position. Throughout this SOP-1sqf procedure, functions which may be completed by a designee will include the following references: “[position] or designee...” or “[position]/designee...”
- 2.13 Surveillance Audit – a six (6) month post-certification or post-recertification audit conducted by a PJRFSI Auditor to assess the continued effectiveness of a Supplier's implementation of the SQF Code according to the Supplier's scope of certification. Surveillance Audits are required by Suppliers with multi-site certification and by Suppliers who achieve only the minimum level of compliance at a Certification/Recertification Audit.
- 2.14 Recertification Audit – a twelve (12) month post-certification audit conducted by a PJRFSI Auditor to assess the continued effectiveness of a Supplier's SQF System in its entirety and to serve as the basis for re-qualifying the Supplier for continued certification.
- 2.15 SQF Guidance Documents – guidance documents are available for some SQF modules and food sector categories from the SQFI website (sqfi.com). The guidance documents are available to assist the supplier, but are not auditable documents. Where there is a divergence between the guidance document and the SQF Code, the SQF Code (English) prevails.
- 2.16 SQF Logo - The logo, as issued by SQF and authorized by PJRFSI for use by a Certified SQF Code for Manufacturing, Storage and Distribution, Retail, Primary, Food Packaging and Quality Supplier to

publicize SQF certified status. SQFI's guidance document, SQF Quality Shield and Logo Rules of Use, describes the rules regulating usage of the SQF Logo.

- 2.17 SQF Quality Shield – The SQF Trade Mark, as issued by SQF and authorized by PJRFSI for use only by a Certified Supplier to the SQF Code for Quality to publicize SQF Quality certified status. SQFI's guidance document, SQF Quality Shield and Logo Rules of Use, describes the rules regulating usage of the SQF Quality Shield.
- 2.18 SQF Web Application and Database Program, herein referred to as the SQF database – the online database and project management program maintained by SQFI and accessed by various SQF stakeholders including SQF scheme/program owners, certification bodies, suppliers, auditors, and buyers.
- 2.19 Information Communication Technology (ICT): Information and communication technology. The use of technology for gathering, storing, retrieving, processing, analyzing and transmitting information. It includes software and hardware such as smartphones, handheld devices, laptop computers, desktop computers, drones, video cameras, wearable technology, artificial intelligence, and others.

### **3 Request for Certification**

- 3.1 The Applicant initiates the certification process via a written or verbal request for information to PJRFSI.
- 3.2 In response, a PJRFSI Project/Sales Manager or the Food Safety Program Accreditation Manager or designee provides the Applicant with the FS-1 – Food Safety Certification Questionnaire/Client Application.
- 3.3 Duly Authorized representatives of the Applicant must complete and sign the Questionnaire/Application to provide PJRFSI with sufficient information required for the quotation/certification process.
- 3.4 Upon receipt of the signed application, PJRFSI's Food Safety Program Accreditation Manager or designee trained in SQF quoting procedures conducts and maintains records of an application review to ensure that:
  - a. certification requirements are clearly defined, documented, and understood;
  - b. any differences in understanding between PJRFSI and the Applicant are resolved; and
  - c. PJRFSI has the resources and competencies to perform the certification services sought by the applicant, and if not, PJRFSI's Food Safety Program Accreditation Manager or designee will reject the application until such time as the required resources and competencies are acquired.

The record of this review is the Food Safety Program Accreditation Manager or designee's signature at the bottom of the FS-1 Client Application and a completed F-207 – Food Safety Quote Approval and Audit Duration Justification Checklist.

- 3.5 If PJRFSI is not contracted with qualified and competent personnel registered with SQFI in the particular Food Sector Category(ies) (FSC) required by the Applicant, then PJRFSI refrains from providing the Applicant with a quotation, and notifies the Applicant accordingly, until such time that PJRFSI has recruited, screened, and signed an agreement with the required qualified and competent personnel. (Required qualified and competent personnel may include: an auditor; a team of auditors; or a combination of an auditor and a technical expert. See @SOP-17 for requirements and use of a technical expert.)
- 3.6 Based on the information furnished by the Applicant and input from the application review conducted by the Food Safety Program Accreditation Manager or designee, PJRFSI's Sales Coordinator or designee completes a quotation in the form of a certification agreement which identifies the scope of certification and details the costs of the certification audit and subsequent recertification audits. The required number of audit days is determined using the latest SQF Audit Duration Guidance with

consideration of the following possible deviations:

- 3.6.1 Possible reasons for increasing SQF audit duration include the following:
- a. complicated logistics involving more than one building/location where work is carried out
  - b. very large site for number of employees
  - c. older sites, not purpose built, with difficult material flow
  - d. in house laboratory
  - e. design and development activity
  - f. highly complex processes and/or diverse products
  - g. relatively high number of unique products, processes or activities, CCPs, PRPs, and OPRPs
  - h. likely complexity/components to the HACCP plan/studies
  - i. time consuming access procedures for high-risk areas
  - j. seasonal factors, e.g. harvesting, weather
  - k. staff speaking more than one language (requiring interpreter(s) or preventing individual auditors from working independently) \*
  - l. more than one shift per day, regularly scheduled weekend and/or night work
  - m. the extent of contractor engagement and deployment
  - n. the labor intensity of processes
  - o. high degree of variation in work practices
  - p. complex management structure
  - q. cultural factors e.g. requirement for a high degree of formality, additional meetings, etc.
  - r. implementation history of management system (or absence of)
  - s. a large number of internal or external complaints/incidents
  - t. the number of non-conformities recorded in previous audits
  - u. any difficulties experienced during the audit which require further evaluation
  - v. the quality of company preparation, documentation, etc.
  - w. additional or unusual statutory, regulatory, or license conditions
  - x. high degree of interest from interested parties e.g. competitors, regulators, community groups, unions
  - y. additional requirements for other programs/reports e.g. Ethical Sourcing, customer-specific checklists, etc.
  - z. complex reporting requirements set by specifiers/standard owners
  - aa. first visit by the auditor to the company

\* Interpreters will be provided by PJRFSI to ensure that competency and conflict of interest requirements are met.

- 3.6.2 Possible reasons for decreasing SQF audit duration include the following:
- a. modern purpose built plant
  - b. very small site for number of employees
  - c. abnormal number of employees for the processes involved, e.g. some plants in some developing countries
  - d. high degree of automation
  - e. simple, single process (e.g. packing)
  - f. limited product and process diversity
  - g. integration of other management systems in company
  - h. management system having a long history of effective implementation
  - i. high degree of demonstrated knowledge and commitment to the system
  - j. high degree of confidence in the effectiveness of the organization's internal audit, corrective and preventive action, and management review processes
  - k. Company well briefed and prepared to provide the evidence required (procedures, records, and other documentation)

3.6.3 Justification for quoted audit days is recorded on the F-207 Food Safety Quote Approval and Audit Duration Justification Checklist and must be approved by the Food Safety Program Accreditation Manager or designee.

3.6.4 Transfers are handled in accordance with Section 12 below.

- 3.6.5 PJRFSI may conduct SQF audits combined with other certification system audits or audit elements, as long as all program rules are met and the integrity of any one component of the combined audit is not compromised. PJRFSI does not, however, conduct any consulting or training in combination with SQF audit activity.
- 3.6.6 A pre-assessment is optional but encouraged for Suppliers, particularly those seeking initial certification to the applicable standard
- 3.7 The Project/Sales Manager provides the Applicant with a duly authorized copy of the SQF Certification Agreement (FS-3sqf) and the Terms and Conditions (FS-3tc). (In some cases, the Certification Agreement and Terms and Conditions are forwarded directly to the Applicant by PJRFSI's Sales Coordinator or the Food Safety Program Accreditation Manager /designee.) The Applicant then completes, signs, and returns a copy of the Certification Agreement bearing an original signature.
- 3.8 Signatures by both parties indicate mutual agreement of the Certification Agreement including the scope of certification and any exclusions, the certification costs, and the associated Terms and Conditions. After the Agreement is signed, amendments, agreed on by both parties, may be issued as necessary. However, once the certification Facility Audit has begun, the scope of the certification shall not be altered.
- 3.9 Receipt of the signed Certification Agreement and the first installment payment by the Applicant to PJRFSI is taken as an instruction to proceed in accordance with the SQF Certification Agreement and the Terms and Conditions. The Food Safety Program Accreditation Manager or designee sends the Applicant, hereafter referred to as the Supplier:
- a. A summarized version of the certification procedure;
  - b. SQF database guides for registering as a Supplier, accessing audit reports, and managing corrective action responses;
  - c. SQF Document and Facility Audit Checklists; and
  - d. as appropriate, any other guidance documents describing the audits or the certification process.
- 3.10 To be considered for SQF certification, suppliers are required to register in the SQF database. Registration is annual, and there is a fee per supplier site payable to SQFI at registration and renewal. Suppliers must register with SQFI prior to achieving certification, and must remain registered at all times to retain their certification; the supplier certificate will be invalid until the facility is properly registered in the assessment database.
- 3.11 The Food Safety Program Accreditation Manager or designee is responsible for monitoring and verifying the progress of the Supplier's certification program including but not limited to audit stage/type, audit/certification status, and timeline/due date performance for both Supplier and Certification Body (PJRFSI) activities. To support these monitoring and verification activities, the Food Safety Program Accreditation Manager or designee utilizes: the PFCsqf SQF Process Flow Chart; the PFCsqf-TL SQF Audit Status and Timeline Monitoring Guidance; PJRFSI's database, PJView; and the online SQF database.
- 3.12 If the requirements for certification change at any time and need retroactive implementation, PJRFSI's Food Safety Program Accreditation Manager or designee will ensure that the Supplier is notified as soon as possible by the most appropriate means and that the new requirements are followed/implemented at the next onsite audit activity or sooner if necessary.

## **4 Scheduling Audits**

- 4.1 Once the signed Certification Agreement (FS-3sqf) is received, The Food Safety Program Accreditation Manager or designee assigns an SQF registered auditor to the Supplier's audit program after verification that:

- a. The Auditor is registered with SQFI to audit all food sector categories in the Supplier's scope of certification;
  - b. The Auditor has had no prior relationship with the Supplier which would present a conflict of interest. The Auditor will confirm this by signing a F-71fs65 Certification Personnel Statement of Availability before completing the audit.
  - c. The Auditor has not performed the Supplier's last three (3) consecutive SQF certification cycles. (Please note that one certification cycle includes a Certification/Recertification audit and 6-month Surveillance Audit, if necessary, as well as any follow-up or special visits to verify corrective actions or the continued effectiveness of the SQF System.
- 4.2 The Supplier is assigned to an Food Safety Audit Program Coordinator (Scheduler) who will contact the Supplier's SQF Practitioner or other designated Management Representative to confirm tentative dates for the auditing activities (the initial certification cycle consists of a Stage 1 Document Audit and a Stage 2 Facility Audit). The Scheduler coordinates the desired dates with the availability of the assigned Auditor pre-selected by the SQF Program Accreditation Manager or designee. Often this process requires the Scheduler to contact the Supplier and the Auditor multiple times before mutually agreed upon dates can be scheduled for the auditing activities.
- 4.3 The Scheduler sends the Scheduled Audit Form to the auditor when the dates are confirmed and entered into PJview.
- 4.4 The Scheduler then sends the Supplier an Audit Scheduling Acknowledgement form (F-163fsi) or equivalent document for the Supplier to sign and return by fax which indicates:
- a. Supplier's acceptance of the proposed audit dates and time;
  - b. Supplier's acceptance of the proposed audit team whose background information is available upon request. The Supplier has the right to object in writing to the appointment of any particular auditor or technical expert providing the objection is valid, i.e. employee of a competitor, personal differences, etc.
  - c. Supplier's confirmation that all processes/procedures/activities will be ready by the proposed audit date.
- 4.5 The Scheduler then creates an Auditor Assignment Form (F-27fsi) and forwards it to the Auditor(s) after approval by relevant Customer Service Personnel.

## 5 The Document Audit

- 5.1 SQF Auditors utilize the latest SQF Code to conduct SQF audits, but will not add additional standards, criteria, or interpretation to the SQF audit. PJRFSI may seek additional guidance/interpretation from the SQF Institute's personnel as needed.
- 5.2 A comprehensive Document Review or Desk Audit of the Supplier's SQF System, sometimes referred to as the Stage 1 Audit, is conducted:
- a. upon initial certification;
  - b. when the Supplier discloses that there have been major changes to the company's SQF program, personnel, facility, and/or procedures;
  - c. when a change in the SQF Code necessitates a new documentation review;
  - d. or as determined by PJRFSI.
- 5.3 PJRFSI undertakes the Document Review to verify that:
- a. the Supplier's SQF System documentation meets the requirements of the SQF Code and is relevant to the scope of certification and the products processed there under;
  - b. an appropriately qualified SQF Practitioner is designated; and
  - c. The Food Safety Plan and the Food Quality Plan have been derived as required in the SQF Code and using an HACCP Method and have been developed, validated, and verified by the SQF Practitioner.



- 5.4 The Document Audit is conducted prior to the onsite Facility or Stage 2 portion of the Certification Audit and may be conducted onsite or offsite. If the Document Audit is conducted offsite, then the Supplier is responsible for sending a copy of their SQF program documentation and records to the Auditor in advance of the scheduled audit activity. If the Document Audit is conducted onsite, then the Supplier is expected to have these documents ready for review upon the Auditor's arrival at the facility. In some cases and regardless of whether the Document Audit will be conducted onsite or offsite, PJRFSI may require that the Supplier provide evidence of their readiness prior to the audit activity.
- 5.5 Within 30 days in advance of the Document Audit, the SQF Program Accreditation Manager or designee creates the offline audit report tool in the SQF database and releases it to the Auditor for use in documenting the results of the audit.
- 5.6 Regardless of where the Document Audit is conducted, the Auditor is responsible for creating an Audit Plan using the F-184fs65 Audit Plan Template and preparing the Audit Workbook (WBfs65). The Auditor provides the Supplier with a copy of the Audit Plan in advance of the Audit. If the Supplier and PJRFSI have agreed that an offsite Document Audit is possible, then the Auditor will conduct the opening and closing meetings (meetings agendas are found in the Audit Workbook) by telephone or web conference.
- 5.7 At the closing meeting, the Auditor leaves the Supplier, at a minimum, with a copy of nonconformities with due dates for corrective actions. See section @6.10 for a description of nonconformities.
- 5.8 Typically, corrective actions for Facility Audit major and minor nonconformities are due within 30 days. However, the Auditor has some flexibility in setting the due dates for Document Audit corrective actions based on: the nature of the corrective action requests and the time window remaining in advance of any scheduled Facility Audit. All Document Audit corrective actions, however, must be closed *prior to the start* of the Facility Audit.
- 5.9 The Auditor documents the results of the Document Audit in the SQF database offline audit tool report format and submits it to PJRFSI's Food Safety Program Accreditation Manager or designee to forward to a PJRFSI Technical Reviewer for a preliminary technical and grammatical review. (See @Section 7 for additional information about the reporting cycle).
- 5.10 PJRFSI's Technical Reviewers are required to complete and sign the F-71fs65 – Certification Personnel Statement of Availability prior to reviewing an audit report or package in order to confirm that they are impartial and free from any conflict of interest. Note: the Auditor who carried out the evaluation may not serve as the Technical Reviewer.
- 5.11 The PJRFSI Technical Reviewer conducts a preliminary technical and grammatical review of the audit report and documents the results of the review in the F-67fs65-A, Audit Report Review Form - Food Safety Programs, or an equivalent format. If needed, the audit report is returned to the Auditor for clarification or revision. A record of reviews is maintained using the F-67fs65 Audit Package Review Form – Food Safety Programs.
- 5.12 Once the preliminary review and approval of the report is complete and *within ten (10) calendar days from the last day of the Document Audit (the last day of the audit is Day 0)*, PJRFSI's Food Safety Program Accreditation Manager, Auditor, or designee, as appropriate, releases the audit report to the Supplier through SQF's database or other means as appropriate. If situations arise wherein the Supplier and/or PJRFSI's Technical Review team may require additional time to agree on the audit report findings, any delay in releasing the report within ten (10) calendar days will be justified and documented by the Food Safety Program Accreditation Manager or designee (F-67fs65).
- 5.13 The Supplier responds to all corrective actions by submitting a corrective action response and supporting evidence in the SQF database.
- 5.14 Within the SQF database, the Auditor verifies that the Supplier has appropriately addressed all corrective action requests from the Document Audit and then changes the status of each corrective

action request to closed. The Auditor is responsible for notifying the Supplier if any submitted corrective actions are unsatisfactory.

- 5.15 The onsite Facility Audit may be scheduled but it cannot be confirmed until all nonconformities from the Document Audit have been corrected by the Supplier.
- 5.16 A PJRFSI Technical Reviewer, assigned by PJRFSI's Food Safety Program Accreditation Manager or designee, reviews the Document Audit corrective action request closures and issues a recommendation as to whether the client is truly ready to proceed to the Facility Audit. The Technical Reviewer's recommendation is documented on the F-67fs65 Audit Package Review Form or equivalent format.
- 5.17 The Technical Reviewer or designee's recommendation that the Supplier is ready to proceed prompts the Food Safety Program Accreditation Manager or designee to notify the Supplier's Food Safety Audit Program Coordinator (Scheduler) at PJRFSI to schedule and/or confirm the Facility Audit with the Supplier.
- 5.18 If PJRFSI at any time prior to the Facility Audit determines that a modification to the contracted audit time is required due to a change in the Supplier's scope of certification or due to any other circumstances not previously known (typically changes are identified by the Auditor during the Document Audit), PJRFSI requires that the Supplier sign a certification agreement amendment. A signed certification agreement amendment and a completed FS-102 Scope Approval/Exclusion/Revision Form is also required when there is any change in the scope of certification (including certification code, products, FSCs, site address or addresses, Supplier name) even if there is no resulting change in the required audit time.

## **6 The Onsite Facility Audit (Certification, Surveillance, and Recertification Audits)**

- 6.1 This description of the Facility Audit is applicable to Certification, Surveillance, and Recertification Facility Audits. See @Section 8 for additional information about Surveillance and Recertification audits.
- 6.2 PJRFSI undertakes the Facility Audit to verify the effectiveness of the Supplier's SQF System in its entirety and to establish and verify, at the time the audit is conducted:
  - a. the effective interaction between all elements of the SQF System;
  - b. the effective identification and control of food safety hazards and food quality hazards as applicable to the Supplier's code of certification;
  - c. the Supplier's level of commitment to maintaining the effectiveness of the SQF System and to meeting their food safety regulatory and customer requirements.

The Facility Audit is *not* designed to affirm the safety and/or fitness of the Supplier's products and/or services or that the Supplier is operating in accordance with all food safety regulations at all times.

- 6.3 The Facility Audit is always conducted onsite when the main processes are operating. If a Supplier operates under seasonal conditions (a period in which the major processing activity is conducted over not more than five consecutive months), the Facility Audit shall be conducted during the peak operational part of the season. Where suppliers seek to include products from more than one season within their scope of certification, the supplier and certification body shall agree to conduct the initial certification audit during the highest risk and/or highest volume production operation. Documentation and records for other seasonal production shall be reviewed as part of the certification audit.
- 6.4 All corrective action requests from the Document Audit must be closed prior to the start of the Facility Audit. Supplier is also required to complete at least one internal audit and management review cycle prior to the start of the facility audit.
- 6.5 The Auditor is responsible for creating a Facility Audit Plan using the F-184fs65 and F-184fs65-A Audit Plan Templates and providing this plan to the Supplier in advance of the Facility Audit.

- 6.6 An opening meeting is held using the Opening Meeting Agenda found in the Auditor Workbook (WBfs65).
- 6.7 The Auditor(s) will audit the Supplier's processes where they occur and the audit will cover processing, storage, packaging, and formulation areas within the facility, the exterior of the facility, amenities, waste holding areas, interviewing key personnel within the facility, and on-floor or in-process record review. The Auditor(s) should use an interviewing technique which involves the open-ended questioning of various key personnel within the facility on the implementation of the SQF program. Audit evidence gathered through interviews should be verified by acquiring supporting information from independent sources, such as observations, records, and results of existing measurements. Mandatory elements of the SQF Code shall not be reported as "exempt" or "not applicable".
- 6.8 In relation to product inspection, PJRFSI shall ensure that: the relevant product standard requirement is adhered to; statistically proven lot sampling and sampling techniques with stated confidence levels are used for product sampling when applicable; and procedures are in place to ensure the integrity of sample selection, control, and traceability and testing is undertaken in an unbiased manner when applicable.
- 6.9 The audit team must record copious notes of conformity and nonconformity. Should objective evidence exist to support writing a nonconformity, the following format is used:
- a. Citation of the requirement(s) not being met
  - b. Statement of nonconformity
  - c. Objective evidence observed that supports the statement of nonconformity
- 6.10 PJRFSI defines the following categories of nonconformities and how each is addressed:
- 6.10.1 Critical nonconformity:
- a. Definitions:
    1. a breakdown of control(s) at a critical control point, pre-requisite program, or other process step whereby product safety is compromised and the breakdown is judged likely to cause a significant public health risk and/or where product is contaminated;
    2. failure to take corrective actions within the timeframe agreed between the Supplier and PJRFSI.
    3. systemic falsification of records relating to food safety controls and the SQF System.
  - b. A critical nonconformity confirmed during any Facility Audit (initial Certification, Recertification or Surveillance) results in a failed audit. (Critical nonconformities are not raised during Document Audits.)
  - b. Where a critical nonconformity is detected at a Surveillance or Recertification audit, PJRFSI suspends or withdraws the SQF Certificate. The criteria for dealing with suspensions and withdrawals of Certification are outlined in Section 9 of this document.
- 6.10.2 Major nonconformity:
- a. an omission or deficiency in the SQF System producing unsatisfactory conditions that carry a food safety or quality (as applicable) risk and are likely to result in a System element breakdown.
  - c. A major nonconformity shall be corrected and appropriate corrective action verified and closed out within thirty (30) days of the completion of the onsite audit (last day of audit is Day 0).

In circumstances where the corrective action involves structural change or where the

major nonconformity cannot be corrected due to seasonal conditions, or where there is no immediate threat to product safety or quality (as applicable), this period can be extended provided the corrective action time frame is acceptable to PJRFSI (see @6.10.5 regarding corrective action extension requests). Before or at the next Surveillance or Recertification audit, the Auditor verifies that appropriate corrective action was implemented.

6.10.3 Minor nonconformity:

- a. an omission or deficiency in the SQF System producing unsatisfactory conditions that if not addressed may lead to a food safety or quality (as applicable) risk but are not likely to cause a System element breakdown.
- b. A minor nonconformity shall be corrected, verified, and closed out within 30 days of the completion of the onsite audit. In circumstances where there is no immediate threat to product safety or quality (as applicable), PJRFSI may grant extensions (see @6.10.5 regarding corrective action extension requests). Before or at the next Surveillance or Recertification audit, the Auditor verifies that appropriate corrective action was implemented.

6.10.4 Extensions: In circumstances where there is no immediate threat to product safety or quality (as applicable), the Supplier may request an extension to close out a corrective action request. The Food Safety Program Accreditation Manager or designee provides the Supplier with PJRFSI's F-211 Food Safety Programs Corrective Action Extension Request Form which requires the Supplier to: justify the need for an extension; describe the intended corrective action and the interim containment; and commit to a date by when the corrective action will be completed. Suppliers should submit extension requests prior to or by the corrective action due date. The F-211 requires documented approval of the extension request with preliminary approval by the Auditor and secondary approval by a Technical Reviewer. Similarly, the F-211 provides for the documentation of the Supplier's completion of the corrective action as well as the Auditor's preliminary closure approval and a Technical Reviewer's final approval.

6.10.5 Failed Audits – When a Supplier fails a Facility Audit on the initial certification cycle, due to the type and/or number of nonconformities, the Supplier must complete another Facility Audit within six (6) months so that a new Document Audit is not required. Any Supplier who allows more than six (6) months to lapse since the initial failed audit must undergo a new Document Audit with PJRFSI.

- 6.11 Once the Auditor has made an observation during the audit, the Supplier, if possible, may take corrective action during the audit. However, the Auditor's rating must reflect the condition or status prior to the Supplier's corrective actions.
- 6.12 If the Auditor identifies a critical nonconformity during the course of the audit, s/he will contact PJRFSI's Food Safety Program Accreditation Manager or designee to discuss the observation and verify the rating. If the critical nonconformity is confirmed, PJRFSI's Food Safety Program Accreditation Manager or designee, in the case of Surveillance and Recertification audits, immediately suspends the Supplier's certificate until all corrections and corrective actions are verified (see @Section 9 on suspensions).
- 6.13 If the Auditor identifies a critical or major nonconformity during the course of the audit, s/he must also: notify the SQF Practitioner immediately; observe any corrections that the facility undertakes; and, circumstances permitting, complete the audit.
- 6.14 On audits where a team of auditors is required, if a member of the audit team identifies a suspected critical/major nonconformance during the course of the audit, s/he must notify the Lead Auditor immediately. Team members are expected to refrain from classifying nonconformities during the course of the audit. Classifying nonconformities is the responsibility of the Lead Auditor, who makes the final determination of nonconformities and their severity.

- 6.15 For multiple day audits, the Auditor holds a daily wrap-up meeting with the audit team and the SQF Practitioner to discuss a summary of the findings of that day. On the last day of the Facility Audit, the Auditor holds a closing meeting using the Closing Meeting Agenda. At a minimum, the Auditor leaves a copy of nonconformities with the Supplier.
- 6.16 The Auditor and/or other PJRFSI personnel are allowed to explain findings and/or clarify the requirements of the SQF Code but shall not give prescriptive advice or consultancy as part of the audit or the certification process. This does not preclude normal exchange of information with the Supplier.
- 6.17 The scheduler or appropriate designee seeks feedback from the Supplier by sending them the F-18fsi Customer Satisfaction Survey and F-38fsi Auditor Evaluation (Client Feedback Form) within approximately two weeks from the last day of the onsite facility audit.

## **7 The Use of Information Communication Technology (ICT) in the Audit Process**

- 7.1 SQF allows the use of ICT for Remote Activities. Remote activities are the actions that occur to collect objective evidence from a location other than the physical location of the audited organization as part of a full systems audit.
- 7.2 It can apply to initial certification, recertification and surveillance audits. It cannot be used with an unannounced audit. A minimum of half of the audit duration shall be on-site.
- 7.3 Prior to the remote activities, the PJRFSI determines the feasibility of using ICT methods with the site by sending the FS-108ict Virtual Audit Questionnaire to the site to fill out and return. After it is reviewed and approved by the Food Safety Program Accreditation Manager or Designee then a blended audit (an audit that has both remote activities and onsite portions) can be scheduled. The virtual audit button is marked in PJview and the remote activities will be designated on the F-27 Auditor Assignment Form.
- 7.4 PJRFSI will assign GoToMeeting as the ICT platform or the Food Safety Program Accreditation Manager or designee approves the use of a client's preferred secure platform.
- 7.5 Preference would be that the remote activities would occur prior to the on-site audit. There shall be no more than 30 days between the use of ICT activities and the completion of the on-site audit. Under extenuating circumstances, and the 30-day requirement cannot be met, the time period may be extended to no more than 90 days, but may not extend outside the audit recertification window.
- 7.6 Any non-conformances that were identified during the on-site or off-site audit process shall be closed out following the requirements in the relevant SQF Code. If an extension was granted and the remote and on-site audit activities were greater than 30-days apart then major non-conformances identified in any of the SQF Food Safety Codes shall be closed out within 30 days of the sited non-conformance. This shall be sited in the audit report.
- 7.7 The scope of certification description shall include the phrase, "Remote Activities" when remote activities are used. Where remote activities are used the audit plan and schedule shall reflect the type and activity used.
- 7.8 PJRFSI will schedule the same auditor to conduct the on-site and remote activities. If there is a need to use two different auditors for the remote activities and on-site audit then both auditors shall be qualified to conduct the audit under the site's scope of certification. PJRFSI will require the auditor that performs the remote activity to fill out the SQF Audit Report with evidence collected and the WB-fs65. The auditor that performs the onsite audit will be provided copies of the report and any NCRs prior to the audit. The onsite auditor will be required to fill out the rest of the audit report; updated the onsite audit plan and complete the WB-fs65.

## **8 Audit Reporting and the Certification Decision**

- 8.1 The Auditor documents the results of the Facility Audit using the latest version of the SQF Audit Report.

- 8.2 For **each** element of the audit report, the Auditor must:
- assess a rating of compliance, non-compliance, or exempt status
  - provide a concise comment using objective evidence to justify the rating (including exempts)
  - complete a corrective action request for all nonconformities observed

(Please note this is also applicable to the Document Audit report.)

- 8.3 SQF mandatory elements are indicated in the SQF Code and Checklists and may never be considered “exempt” or “not applicable.” The Auditor may use an “exempt” rating for questions in the following cases:
- when an audit element is not applicable, i.e. high risk audit questions in a low risk facility;
  - when a Supplier has requested in writing and received approval from PJRFSI (the Auditor and/or the Food Safety Program Accreditation Manager or designee as appropriate), *prior to the audit*, that certain operational elements (production lines, processes, and or facility premises) be exempt; or
  - when the initial question within a particular system element has already received a major or critical nonconformity rating, subsequent question(s) within that element which are tied to the initial question may be considered exempt. However, in the corrective action tab for the initial question, the corrective action request should require that the related exempt questions also be addressed.
- 8.4 The Auditor submits the audit report to PJRFSI's Food Safety Program Accreditation Manager or designee to forward to a Technical Reviewer for a preliminary technical and grammatical review.
- 8.5 PJRFSI's Technical Reviewers are required to sign the F-71fs65 (Certification Personnel Statement of Availability) prior to beginning a review of an audit report or package in order to confirm that they are impartial and free from any conflict of interest. Note: the Auditor who carried out the evaluation may not serve as the Technical Reviewer.
- 8.6 The PJRFSI Technical Reviewer conducts a preliminary technical and grammatical review of the audit package and documents it on the F-67fs65-A, Audit Report Review Form - Food Safety Programs, or an equivalent format. If needed the report is returned to the Auditor for clarification or revision. A record of reviews is maintained using the F-67fs65 Audit Package Review Form – Food Safety Programs.
- 8.7 Once the preliminary review and approval of the report is complete and *within ten (10) calendar days from the last day of the Facility Audit (the last day of the audit is Day 0)*, PJRFSI's Food Safety Program Accreditation Manager, Auditor, or designee, releases the audit report to the Supplier. If situations arise wherein the Supplier and/or PJRFSI's Technical Review team may require additional time to agree on the audit report findings, any delay in releasing the report within ten (10) calendar days will be justified and documented by the Food Safety Program Accreditation Manager or designee on the Audit Package Review Form (F-67fs65).
- 8.8 The Supplier responds to each nonconformity by submitting a corrective action response and supporting evidence to the auditor. The Supplier must respond and the auditor accepts the corrective action response and supporting evidence within the stipulated time frame: 30 days for major and minor calculated from the last day of the facility audit (see section @6.10). If the nonconformity(s) are not closed within the stipulated time the Supplier may have their existing certificates suspended and/or could result in a failed audit. Extensions may be granted at the discretion of PJRFSI (see @6.10.5).
- 8.9 The Auditor verifies that the Supplier has appropriately addressed all corrective action requests from the Facility Audit. The Auditor is responsible for notifying the Supplier if any submitted corrective actions are unsatisfactory.
- 8.10 When all corrective action requests have been closed, the Auditor sends the completed SQF Audit

Report and corrective action evidence to PJRFSI. The Food Safety Program Accreditation Manager or designee assigns a PJRFSI Technical Reviewer to complete the final corrective action request closure review by filling out the appropriate section of the F-67fs65 (Audit Package Review Form – Food Safety Programs) or equivalent format which includes the requirement to document a recommendation regarding certification for the Supplier. Note: the Auditor who carried out the evaluation may never serve as the Technical Reviewer.

- 8.11 In cases where the Technical Reviewer rejects the audit package, s/he or the Food Safety Program Accreditation Manager or designee is responsible for contacting the Auditor or Supplier for resolution. As appropriate, the Food Safety Program Accreditation Manager is responsible for any auditor re-training.
- 8.12 SQF Certification is awarded to Suppliers who achieve the minimum SQF compliance “C” audit rating or greater and with no outstanding non-conformities, except where extensions have been permitted and approved by PJRFSI. Certification of a Supplier’s SQF System by PJRFSI shall provide confidence that the System meets the specified requirements and that the Supplier has implemented and is maintaining and operating the SQF System effectively and in accordance with the scope specified on the Certificate.
- 8.13 *Within 45 calendar days (approximately six weeks) from the last date of the audit* (the last day of the audit is Day 0) and based on a final review of the complete audit package, PJRFSI’s Food Safety Program Accreditation Manager or designee renders a Certification Decision and documents it on the F-67fs65. Note: the Food Safety Program Accreditation Manager or designee who issues the Certification Decision must not have served as an Auditor(s) and/or a Technical Reviewer during any stage of the evaluation process for the particular Supplier.
- 8.14 If Certification is granted, PJRFSI’s Food Safety Program Accreditation Manager or designee creates the electronic Certificate in the latest SQFI and upload the final SQFI Audit Report to the SQF database. The Certificate is valid for twelve (12) months from the date the certification decision was taken.
- 8.15 When certification is granted, PJRFSI’s Food Safety Program Accreditation Manager or designee also provides the Supplier with:
- At least one paper copy of the Certificate (provided by the Certificate Dept.);
  - A statement detailing the duration of the Certification (certificate expiry date and SOP-01sqf);
  - The grounds upon which Certification may be suspended or withdrawn and the requirements for undertaking Surveillance and Recertification Audits and their frequency (SOP-01sqf);
  - Appropriate use of the Certificate and Certification Marks (SOP-03sqf); and
  - The Audit Report including the audit rating.
  - For Suppliers certified to the SQF Quality Code, an electronic copy of the SQF Quality Shield containing PJRFSI’s name and the Supplier’s certification number.

Delivery of the Certificate and other documents may be delayed until the Supplier has paid all outstanding invoices.

- 8.16 The SQF Audit Report remains the property of the Supplier. Only with the Supplier’s written authorization will PJRFSI release audit data to any entity except when mandated by law, statute, or the regulations of the SQF Institute or applicable accreditation bodies.
- 8.17 PJRFSI maintains a list of Certified Suppliers and their scopes of certification (PJRFSI Registry). This information is available to PJRFSI's accreditation bodies and the general public, at no charge, upon request.

## 9. Maintaining Certification: Surveillance and Recertification Audits

9.1 In order to maintain Certification, a Supplier is required to:

- attain the minimum compliance audit rating or greater (as defined in the SQF Code) at

Recertification audits;

- b. ensure that Surveillance and Recertification Audits occur within required timeframes;
- c. ensure all nonconformities are corrected within specified timeframes.

See @Section 9 of this document for more information on suspending and withdrawing certification.

- 9.2 The audit frequency following the initial Certification Audit is determined by the compliance rating achieved during the audit.
- a. Suppliers who achieve a “G” or “E” rating are audited on a twelve (12) month recertification schedule.
  - b. Six (6) month Surveillance Audits are required for Suppliers seeking multi-site certification and for those single site Suppliers who achieved the minimum compliance rating of “C” at their previous Certification or Recertification Audit. Surveillance Audits are required until an appropriate audit result is achieved allowing for an annual Recertification Audit schedule.
  - c. A new score and rating is issued at the surveillance audit; however the re-certification audit date is not affected.
- 9.3 Surveillance and Recertification Audits must be completed within thirty (30) days of their due date. The Supplier’s due date is based on *the last day of the initial Facility Certification Audit*. Surveillance Audits must be conducted within six (6) months from the Supplier’s due date +/-30 days. Recertification Audits are conducted within twelve (12) months from the Supplier’s due date +/-30 days. Whenever possible, Suppliers are encouraged to schedule their Recertification Audits within the 30-day window *prior to the due date* in order to allow the full amount of time for closing corrective action requests and the certification decision process without allowing a lapse in their certification.
- 9.4 If a supplier operates under seasonal conditions (a period in which the major processing activity is conducted over not more than five consecutive months), the Recertification Audit shall be conducted within thirty (30) calendar days either side of the anniversary of the last day of the initial certification audit. However, where there is a significant change in seasonal operations whereby the recertification audit sixty (60) day window cannot be met; the certification body and supplier shall temporarily reset the recertification audit date so that it falls during the peak operational part of the season.
- 9.5 Where the due surveillance audit date falls within the operational season, the conditions in 8.3 apply. Where the due date of the surveillance audit falls outside the operational season, the surveillance audit shall comprise a full review of the corrective actions from the last audit, to ensure preparedness for the next recertification audit.
- 9.6 When a Supplier has undergone a change in location or in their operations including an expanded scope of certification (including products and processes), PJRFSI determines whether an audit is required prior to the Supplier’s due date in order to maintain certification.
- 9.7 When a Supplier has undergone a change in scope that is a reduction of product or process, PJRFSI Food Safety Program Accreditation Manager will process a contract amendment and issue a new certificate with the reduced scope.
- 9.8 Surveillance and Recertification Audits typically follow the same process outlined for Stage 2 Facility Audits above. Both recertification and surveillance audits, a review of site documentation, including all changes to documentation, must also be included. While a review of the Supplier’s procedural documentation, as necessary, is incorporated as part of any onsite Facility Audit (Surveillance or Recertification), an independent Stage 1 Document Audit, as documented in a report, is omitted unless PJRFSI determines a full or partial Document Audit is warranted.
- 9.9 The purpose of both the Surveillance and Recertification Audits is to:
- a. verify the continued effectiveness of corrective actions taken for closed nonconformities from the previous audit(s);
  - b. verify that the SQF System continues to be implemented as documented;
  - c. consider any changes to the Supplier’s operations including the impact on the Supplier’s SQF



- System and take appropriate action;
- d. verify all critical steps remain under control;
  - e. verify the effective interaction between all SQF System elements and the System as a whole, particularly when any changes in the operation have occurred since the last audit;
  - f. verify that the Supplier continues to demonstrate a commitment to maintaining the effectiveness of the SQF System and to meeting regulatory and customer requirements; and
  - g. contribute to continued improvement of the Supplier's SQF System and business operation.
- 9.10 When assigned to complete a Surveillance or Recertification audit, the Auditor will access the previous audit report in order to ensure effective and strategic audit planning. A risk-based approach is employed to ensure that areas that were problematic on previous audits are prioritized for review on the given audit.
- 9.11 Where a nonconformity is found, it shall be corrected within the time agreed by PJRFSI (the Auditor and/or the Food Safety Program Accreditation Manager or designee as appropriate) and as follows:
- a. Minor nonconformities must be corrected within thirty (30) calendar days.
  - b. Major nonconformities must be corrected and appropriate corrective action verified within thirty (30) calendar days.
  - c. Critical nonconformities result in a failed audit and are handled according to Section 9 below, Conditions for Suspending or Withdrawing Certification.
- 9.12 In circumstances where the corrective action involves structural change or where the major nonconformity cannot be corrected due to seasonal conditions, and/or where there is no threat to product safety, extensions may be requested by the Supplier and, if approved, granted by PJRFSI. (See @6.10 for extension procedure).
- 9.13 If the site's recertification audit is due but the site is inaccessible due to COVID-19 restrictions, PJRFSI conducts a risk assessment to determine the risk to food safety and the site's SQF system by extending the certificate. The Scheduler sends the site the FS-228sqf to fill out and send back. A two hour risk assessment is then scheduled with an approved SQF auditor. See Section 18 for more details.
- 9.14 The auditor documents the information from the risk assessment information and conversation with the site on the FS-229sqf. A risk level (e.g. low/ high) is assigned for determining certificate extension. Examples of low and high-risk levels are below:
- Low. Then the PJRFSI must request a six (6) month extension to the recertification audit using the on-line form. The risk assessment must be completed before completing and submitting the request for extension
  - High. The PJRFSI should request additional information and conduct remote activities to determine if the risk can be lowered to permit an extension.
- 9.15 Once the extension is approved the Food Safety Program Assistant or designee request the extension in the SQF Change Request and Notification online form.
- 9.16 SQF will update the recertification date and expiration date in Repositrak and PJRFSI will reissue the certificate with the extended expiration date and send an electronic copy to the client. The recertification audit can be conducted anytime during the extension period. This is just a temporary extension and the re-audit window does not change for future audits.

## 10. Unannounced Recertification Audit

- 10.1 Within three (3) certification cycles the certification body shall conduct one (1) unannounced audit of the supplier. The unannounced audit shall occur in the supplier's facility within the sixty (60) day recertification window (i.e., the anniversary date of the initial certification audit +/- thirty (30) days). Currently certified SQF suppliers shall be required to undertake one (1) unannounced audit within the three (3) year certification cycle.

- 10.2 The supplier certification cycle begins with the initial certification audit date. Unannounced audits shall not be conducted on the initial audit or on a surveillance audit.
- 10.3 If a supplier changes certification bodies, the supplier's unannounced recertification audit schedule shall not change.
- 10.4 Multi-site suppliers are exempted from unannounced audits.
- 10.5 The date of the unannounced audit shall be determined by the certification body within the 60-day recertification audit window. The unannounced year shall be determined between the supplier and the certification body.
- 10.6 A defined blackout period shall be established by negotiation between the supplier and their certification body that prevents the unannounced recertification audit from occurring out of season or when the facility is not operating for legitimate business reasons.
- 10.7 Immediate suspension of the supplier certificate will occur in facilities that refuse entry to the auditor for an unannounced audit. Any subsequent audit to regain certification shall be conducted as an announced recertification audit. The supplier will be required to undergo a surveillance audit during certification cycle. PJRFSI will also declare the following certification cycle as the unannounced audit year.

## 11 Conditions for Suspending or Withdrawing Certification

- 11.1 PJRFSI is responsible for initiating the suspension and withdrawal of SQF Certificates. PJRFSI **suspends** the SQF Certificate where:
  - a. the Supplier receives an "F" or failed rating;
  - b. the Supplier fails to take corrective actions within agreed timeframes;
  - c. when upon investigation of a complaint regarding the Supplier, PJRFSI determines there has been a substantiated breakdown of the Supplier's SQF System or any other condition not in accordance with the SQF Code and/or other supporting documents; or
  - d. the Supplier fails to permit the next required audit, Surveillance or Recertification, to be conducted within the agreed timeframe.
  - e. Fails to permit an unannounced audit
  - f. Where in the opinion of the CB, fails to maintain the requirements of the SQF Code
- 11.2 Where the Supplier's Certificate is suspended, PJRFSI's Food Safety Program Accreditation Manager or designee immediately amends the Supplier's details on the SQF database to a "suspended" status indicating the reason for the suspension and the date of effect, and, in writing:
  - a. informs the Supplier by way an official letter sent by certified mail of the reasons for the action taken and the date of effect; and
  - b. requests that the Supplier provide to PJRFSI, within 48 hours of receiving notice of the suspension, a detailed corrective action plan outlining the corrective action to be taken; and
  - c. copies SQF's Compliance Manager on the suspension notice sent to the Supplier (notice must be provided to SQFI within 24 hours of the suspension).
- 11.3 Where the Supplier's Certificate is suspended:
  - a. within 30 days of receiving the Supplier's corrective action plan and by means of an onsite audit, PJRFSI verifies that the immediate correction has been taken (as applicable to 9.1.a-c).
  - b. where effective implementation of the corrective action plan has been verified, PJRFSI reinstates the Supplier's status in the SQF database and gives written notice to the Supplier and copies SQF's Senior Technical Director that the Supplier's Certificate is no longer suspended; and
  - c. not more than six (6) months after suspension, PJRFSI conducts the Supplier's Recertification Audit to verify the continued effectiveness of the corrective action plan and that the Supplier's SQF System is achieving stated objectives. The Supplier's recertification due date may be reset

based on this date. (Seasonal Suppliers may delay their Recertification Audit until the commencement of the new season.)

- 11.4 Where PJRFSI has suspended a Supplier's SQF Certificate, for the duration of the suspension, the Supplier:
- a. shall not represent itself as holding a SQF Certificate;
  - b. shall not use any goods, products, packaging, stationery, or other items that contain an SQF Quality Shield and/or Logo or that may indicate the Supplier holds a SQF Certificate; and
  - c. shall comply with the requirements outlined in the SQF Quality Shield and Logo Rules of Use.
- 11.5 PJRFSI **withdraws** the Certificate where the Supplier:
- a. has been placed under suspension and fails to submit corrective action plans or take corrective action within 48 hours of receiving notice of the suspension, or fails to take approved corrective action as determined by PJRFSI with the time frame specified;
  - b. has falsified its records;
  - c. fails to maintain the integrity of the SQF certificate;
  - d. fails to comply with its Certificate;
  - e. uses the SQF Logo and/or Quality Shield while under suspension and/or not in accordance with the SQF Quality Shield and Logo Rules of Use;
  - f. promotes excluded products or processes as covered by the certification;
  - g. has an administrator, receiver, receiver and manager, official manager or provisional liquidator appointed over its assets or where an order is made or a resolution passed for the winding up of the Supplier (except for the purposes of amalgamation or reconstruction) or the Supplier ceases to carry on business or becomes bankrupt, applies to take the benefit of any law for the relief of bankrupt or insolvent debtors or makes any arrangement or composition with its creditors.
- 11.6 Where the Supplier's Certificate is withdrawn, PJRFSI's Food Safety Program Accreditation Manager or designee as appropriate immediately amends the Supplier's details on the SQFI database to a "withdrawn" status indicating the reason for the withdrawal and the date of effect; and in writing:
- a. informs the Supplier that the SQF Certificate has been withdrawn, the reason for such action, and the date of effect;
  - b. instructs the Supplier to return the Certificate and electronic copies of the SQF Logo and/or Quality Shield, as applicable;
  - c. instructs the Supplier to comply with Supplier obligations regarding withdrawn certification as detailed in the SQF Quality Shield and Logo Rules of Use; and
  - d. copies SQF's Senior Technical Director on the withdrawal notice sent to the Supplier (notice must be provided to SQFI within 24 hours of the withdrawal).
- 11.7 A site that has their certificate withdrawn will not be permitted to apply for certification for twelve (12) months from the date the certificate was withdrawn by the SQFI certification body. The withdrawn site will be posted on the SQFI website (sqfi.com) for twelve (12) months.

## 12 Supplier Requirement to Notify PJRFSI of Special Situations

- 12.1 The Supplier is required to notify PJRFSI in writing and in a timely manner about any significant change(s), *actual or intended*, which include but are not limited to:
- a. changes in legal or commercial status including changes in name;
  - b. changes in ownership;
  - c. changes in key managerial, decision-making or technical staff;
  - d. changes in the number of employees;
  - e. changes in location and/or site address for the Supplier's operations;
  - f. damage to the site, e.g., damage by fire or natural disaster such as a flood;

- g. changes to the physical building(s) and/or processing operations and equipment;
- h. changes to the scope of certification (including expansion or reduction) in terms of products, processes, and/or facilities;
- i. changes in the Supplier's SQF System or factors influencing the Supplier's SQF System; and
- j. a food safety incident (see @10.2).

**12.2 If at any time based on available information, the Supplier becomes aware that concerns about actual or suspected threats to food safety exist which could require intervention to protect consumers' interests, Supplier must notify PJRFSI immediately. Upon identification that a food safety event requires public notification (such as a Class 1 or Class II recall), the Supplier shall, within twenty-four (24) hours of identifying the event, notify SQFI and Perry Johnson Registrars Food Safety Program Accreditation Manager in writing and by phone call:**

- a. Business hours M-F, 9-5 EST: 248-358-3388;**
- b. After hours and weekends: 248-648-0214**
- c. Email: [foodsafety@pjrfsi.com](mailto:foodsafety@pjrfsi.com);**
- d. SQFI at [foodsafetycrisis@sqfi.com](mailto:foodsafetycrisis@sqfi.com)**

- 12.3 Following notification of a food safety event by the Supplier, PJRFSI will notify SQF and any Accreditation Bodies, as necessary, within a further forty-eight (48) hours of any action PJRFSI intends to take to ensure the integrity of the certification.
- 12.4 When a certified Supplier relocates its business premises, the Supplier's Certificate is no longer valid until a successful initial certification audit (Stage 1 and Stage 2) of the new premises is conducted.
- 12.5 A certified Supplier must notify PJRFSI of any change in ownership with thirty (30) days of the effective change. When a certified Supplier's ownership changes but key staff responsible for the SQF System have been retained, PJRFSI confirms the continued effectiveness of the SQF System within sixty (60) days of the change of ownership by means of a site audit and upon confirmation, allows the Supplier to retain the existing audit frequency status and certification number. If significant changes in key personnel have occurred with the change in ownership, PJRFSI shall complete a full Facility Audit and the Supplier's audit frequency status will be based on this new audit activity.
- 12.6 PJRFSI reserves the right to conduct special audits during the course of the certification period, and as needed in response to changes/incidents as described in @10.1. See @10.4 for relocation of business premises. Where such changes may affect the conformity of the product(s) and/or the Supplier's SQF System, PJRFSI's Food Safety Program Accreditation Manager or designee as appropriate determines whether the announced changes require further investigation and schedules a special audit as necessary. The Auditor documents all nonconformities on the F-212 (Corrective Action Worksheet for Special Audits) and supplies this summary worksheet to the Supplier. The Supplier, in turn, documents all corrective actions taken in the Supplier sections of the F-212 and submits it along with corrective action evidence to the Auditor for approval. Following approval of all corrective actions, the Auditor submits the worksheet and corrective action evidence to the Food Safety Program Accreditation Manager or appropriate designee so that the special audit package may undergo technical review for final approval of corrective actions and a recommendation to maintain the Supplier's certified status and amend their certification details as necessary.
- 12.7 The Supplier must not promote products, processes, and/or facilities/sites which have not been covered in the scope of certification as audited and approved by PJRFSI. Unauthorized promotion will result in the withdrawal of the Certificate.
- 12.8 Where Supplier fails to notify PJRFSI of any of the above changes, PJRFSI may accordingly suspend or withdraw, as deemed appropriate, the Certificate and reserves the right to retroactively invalidate the Certificate effective as of the date the change occurred.

### 13 Promotion of SQF Certification by Supplier

When providing copies of any certification documents (certificates and audit reports) to interested parties, Suppliers shall reproduce those documents in their entirety or otherwise seek permission in writing from PJRFSI. Suppliers shall comply with the latest SQF Quality Shield and Logo Rules of Use issued by the SQF Institute and any additional requirements issued by PJRFSI regarding use of certification marks and promotion of certification. The proprietary names and logos of SQF, any applicable accreditation bodies, and PJRFSI shall not be used by the Supplier in any manner which could be misconstrued or defamatory to the respective parties and/or parties' brands. Any misuse of these proprietary names or logos by a certified Supplier or a Supplier seeking certification shall be reported to the interested parties and responded to with appropriate actions by PJRFSI.

### 14 Conditions for Change of Certification Body (Transfers)

- 14.1 A Certified Supplier shall ensure it has a certification body appointed at all times. A Certified Supplier may elect to cease being a client of a certification body (Former Certifier) and to have PJRFSI, as a New Certifier, undertake audits of its SQF System.
- 14.2 Where a Certified Supplier elects to transfer its Certificate to PJRFSI, PJRFSI's Food Safety Program Accreditation Manager or designee as appropriate undertakes a pre-transfer review of the Supplier's certification status and completes the F-144fsi, Transfer of Certification Body Checklist to:
- a. confirm the stage of the current certification cycle. Unless approval for transfer is obtained from SQF, a Supplier may *not* transfer under the following circumstances:
    1. the Supplier is in the initial certification cycle and has only successfully completed the Document Audit with the current Certifier. Transfer may occur after successful completion of the Facility Audit. Otherwise, the Supplier is required to repeat the Document Audit with a New Certifier.
    2. the Supplier achieved a "C" rating with the current Certifier and is required to undergo a Surveillance Audit. Transfer may occur after successful completion of the Surveillance Audit or through written approval by the SQFI Senior Technical Director.
  - b. confirm the Certificate is current, valid, and relates to the SQF System as Certified;
  - c. confirm the Supplier's Food Sector Category falls within the PJRFSI's Scope of Accreditation;
  - d. confirm that the Supplier has closed all non-conformities issued by the Former Certifier;
  - e. confirm any complaints received are addressed;
  - f. confirm unannounced audit cycle;
  - g. review the Supplier's Audit history (where the Supplier can demonstrate such history to the satisfaction of PJRFSI by way of copies of audit reports completed by any Former Certifier) and the impact of any outstanding nonconformities; and
  - h. confirm Certification under Former Certifier is not suspended or under threat of suspension or withdrawal.
- 14.3 Where a Supplier chooses to transfer to PJRFSI, the Certificate issued by the former Certification Body remains valid until the expected expiration date. As the New Certifier, PJRFSI:
- a. Food Safety Program Accreditation Manager or designee signs off on the completed F-144fsi.
  - b. conducts the required audit which was described by the Former Certification Body within timelines consistent with the SQF program audit frequency and certification requirements;
  - c. issues a new Certificate under PJRFSI and issues a new SQF Quality Shield (SQF Quality Code) which includes the name of PJRFSI; and

- d. ensures the Supplier retains its unique Certification number if requested.

## 15 Disputes and Appeals

Disputes and appeals are handled in accordance with SOP-10, PJR's Dispute/Appeal Procedure which is available upon request.

## 16 Confidentiality

PJRFSI, including all auditors, administrative staff, **Technical Reviewer**, Impartiality Committee, and any other employee or contractor, ensures that all records, data, and information received during the execution of an SQF audit remain confidential and the property of the Supplier. Only with the Supplier's written authorization will PJRFSI release audit data to any entity other than SQFI except when mandated by law, statute, or the regulations of accreditation bodies. In the event that disclosure of such information is required by law or statute, PJRFSI will disclose the information as required and inform the Certified Supplier in writing of such disclosure in a timely fashion.

**17 Multi-site Organizations:** see @SOP-01sqf – Annex A: SQF Multi-Site Certification Procedure and the SQF Code.

**18. Extraordinary Events/COVID-19:** If a scheduled audit cannot be conducted due to restrictions from COVID-19 or because PJRFSI auditor will not be able to travel to the site due to a travel ban then the PJRFSI Scheduler will send the client the FS-228sqf form to complete and send back. Once the completed FS-228sqf is received then an offsite risk assessment for .25 days offsite is scheduled.

An SQF lead auditor will conduct the risk assessment. They will include review of the FS-228sqf as well as hold a scheduled phone conversation with a representative from the site (SQF practitioner, quality manager, farm manager etc). The risk assessment will take into consideration years/certified/rating; low risk or high risk operation; absence of critical situations; legal or compliance pending; recalls; regular operating parameters; adequate crisis management program related to COVID-19; level of changes made since last audit; facility operating to scope of certification; changes to HACCP plan; effectiveness of FSMA as deemed by Management Review; level of changes to services or processes outsourced; customer complaint trends and actions; internal audit findings and closures; and supply chain impact and controls in place. A facility will receive a score in each category based on criteria outlined in FS-229sqf.

- A facility scoring from 15-50 will be deemed low risk and approved for extension
- A facility scoring from 51-66 will need additional clarification and follow up call before extension can be approved.
- A facility scoring above 67 will be deemed high risk and not approved for extension

The auditor will document their risk assessment on the FS-229sqf and indicate if the certificate can be extended due to low risk. Food Safety Program Assistant or designee will notify SQF through required channel and ask for certificate extension. Once approval is received from SQF PJRFSI certificate department will then issue a new electronic certificate with a new expiry date and send to the client. Food Safety Program Coordinator will upload the appropriate information into SQF database if applicable.