



ECOLAB
FOOD SAFETY
INSTITUTE

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QUESTION:

I work in a confectionary manufacturing facility where we make hard candies and chewing gum. There were a few items in Part B of the Safe Quality Food (SQF) Food Safety Code for Manufacturing (ed. 8) which we chose not to comply with because either they did not apply to our operation or we had another way of managing the potential risk to our product and process. During our initial certification audit this week, the SQF auditor did not accept any of our exclusions even though we provided a detailed risk assessment for the exclusions prior to the audit and evidence to support the control was working during the audit. The auditor then stated that the Code did not allow for exclusions. Is this true?

ANSWER:

No. The auditor is not correct in this case. In 2.4.2.1, the SQF Code states exclusions are permitted as long as they are supported by a detailed risk analysis and provided that food safety is not compromised. The specific text is as follows:

The site shall ensure the Good Manufacturing Practices described in modules 3, 4, 9, 10 or 11 (as applicable) of this Food Safety Code are applied, or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures to ensure that food safety is not compromised.

In order to properly exclude a requirement, you need to do the following:

1. Determine if the requirement applies to your type of operation. If it does not, then that will automatically be excluded and you will simply speak to it during the audit. If it does apply, ask yourselves if meeting the requirement will help your business improve. If it will, comply with the requirement. If it will not, then seek to exclude it.

2. If you decide to exclude it, you need to document a detailed risk analysis and show food safety, and quality if you add the Quality Code, is not compromised. This can be documented in many ways, but be sure to include the following:

- a. Identify the requirement you are choosing to exclude.
- b. Identify the potential hazard the requirement is intended to control.
- c. Identify your alternate method of control.
- d. Prove your alternate method of control is working (validation).
- e. Prove your alternate method of control is being followed (verification).

As long as the items within the SQF Code (Module 2) which you excluded were not marked with an "M" for Mandatory, you can apply the same process above for those items as well. Those marked "M" cannot be excluded nor marked "not applicable" at audit.

Remember, it is up to you to provide evidence that excluding a requirement or implementing alternate control measures for an SQF requirement does not pose a risk to your operation.

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Every day, the Ecolab Technical Customer Service line receives hundreds of calls from customers seeking help on a wide variety of issues including the GFSI recognized programs like BRC Food, SQF, FSSC 22000. [Email us](#) your questions.

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ABOUT THE EXPERT



Dr. Tatiana Lorca manages food safety training programs for Ecolab. She is a registered SQF Trainer, FSMA/PCQI lead instructor and IHA approved HACCP Trainer. Previously, she was the technical manager for the SQF (Safe Quality Food) Institute, a division of the Food Marketing Institute. [Email Tatiana](#)

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