

SUPPLIER FOOD SAFETY CODE OF PRACTICE

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INTRODUCTION

Sodexo's Supplier Food Safety Code of Practice sets out the minimum food safety standards for food supplied into Sodexo. This Code of Practice lays down general and detailed requirements as to the standards required for:

- method of production
- environment standards required in which food is produced
- microbiological standards required for specific products

Suppliers are required to strive to meet these standards on a continuous basis as a condition of the supply agreement. For those suppliers where the production and/or logistics are sub contracted, these requirements are expected to be communicated to the sub contractor and monitored.

All food suppliers will be subject to a periodic audit, requirement to undertake a due diligence questionnaire or be asked to provide proof of certification to a recognised food safety and quality standard. All assessments are made against Sodexo's Code of Practice which suppliers are required to adhere to as outlined in this document. Sodexo reserve the right to audit a food supplier at any reasonable time without notice. Where a document based review is undertaken, in lieu of an audit, all documentation is to be supplied in English or accompanied by a translation into English.

It is the responsibility of the Supplier that its employees, sub-contractors, agents, officers or anyone acting on their behalf of the supplier comply with all and any applicable legislation, laws, codes of practice, good industry practice and prescribed standards relating to the provision of the Services (as may be in force from time to time). It is the Supplier's responsibility to ensure that it is not in breach of any of the foregoing. Compliance with the Sodexo Code of Practice shall not excuse the Supplier from this obligation.

The Code is divided into sections and is supplemented by product specific requirements and food product microbiological specifications.

The Code is based not only on minimum legislative requirements but on Industry Guides and good manufacturing practice. It is Sodexo policy to obtain only the best quality products from the most reputable suppliers.

This Code should be read in conjunction with Sodexo's Product Assurance Scheme.

Suppliers will be audited against this Sodexo Supplier Food Safety Code of Practice.

THE CODE

SECTION 1 HAZARD ANALYSIS CRITICAL CONTROL POINTS (HACCP)/FOOD SAFETY POLICY

A food safety policy should be developed and communicated to all staff. This may include information such as food safety information, quality policies, commitment to food safety.

A fully documented food safety management system must be available and appropriate to the type of products supplied. The HACCP system shall identify and control all food safety hazards at all stages in the production and distribution of food. The system must be fully operational and understood by all food handlers as appropriate to their job.

The system must be regularly monitored and kept under review. This is a key requirement and failure to demonstrate the operation of such a system will almost certainly result in a failed audit.

The format of the HACCP system will vary from one supplier to another and will be dependent on a number of issues, including the nature of product supplied and whether the supplier is a manufacturer or distributor. It is important when applying HACCP to be flexible where appropriate, given the context of the application, taking into account the nature and the size of the operation. However, whichever format is adopted the 7 principles of HACCP shall be followed:

1. Conduct a hazard analysis - identify all the potential hazards associated with each process step and consider any measures to control the hazards.
2. Identify the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels.
3. Establish critical limits at critical control points. Critical limits separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards.
4. Monitoring - establish and implement effective monitoring procedures at critical control points (CCPs).
5. Corrective actions - establish corrective actions when monitoring indicates that a critical control point is not under control.
6. Verification - establish procedures which shall be carried out regularly, to verify that the measures outlined in paragraphs 1 to 5 are working effectively.
7. Documentation and records - documentation and record keeping shall be sufficient to assist the company to verify that the HACCP controls are in place and maintained. Documents and records should be commensurate with the nature and size of the food business.

Through the HACCP system, the supplier must be able to demonstrate effective control of all operations undertaken. Suppliers will be required to integrate the prerequisite programs described in the following sections into a documented HACCP system.

More specifically, suppliers will be required to demonstrate, amongst other criteria, the following:

- Purchasing procedures including own supplier assessments
- Full product traceability, both in process and at the finished product stage
- Suppliers must demonstrate downstream and upstream traceability
- Process control, including foreign material control and, where appropriate, product temperature control and microbiological checks
- Stock rotation procedures
- Control of non-conformances, including corrective action procedures
- Handling, safe storage, packaging and distribution of the finished product
- Product recall procedure
- Management of returned products (where applicable)
- Staff training to an appropriate level
- Management of pest control
- Consideration of the potential for and temptation of fraud and/or adulteration of raw materials and finished product
- Allergen management

SECTION 2 PURCHASING

2.1 Product specifications

Specifications should be available for all products and materials purchased for use in the operation. Specifications should be agreed between the supplier and the purchaser and should form the criteria on which incoming inspection of purchased materials and services is based. Specifications should be available in an electronic format. New product specifications must be sent to Sodexo Purchasing department when there has been a change to an existing product/ingredient or when there is a new product/ingredient. Where the product is sourced as a core listed line, allergen information must also be updated to the dietetics' team.

2.2 Purchasing procedures

Purchases should only be made from approved suppliers.

It is essential that there is a clear assessment trail and supplier traceability system in place so that ingredients, including fully or partly prepared items, especially high risk foods, can be traced back to their origin if necessary. Consideration should be given to the complexity of the supply chain prior to arrival to site. Suppliers must be able to demonstrate this procedure to Sodexo at any time.

2.3 Own supplier assessments

The receipt of good quality, hygienically prepared foods and ingredients is essential to food safety. Therefore, suppliers must be assessed and approved in a systematic way. This may be by an audit, self – assessment questionnaire sent to the supplier, a 3rd party food safety accreditation certificate or a mixture of all. The frequency and type of assessment shall be based on risk. At some stage however a technical visit will be required, taking into account past performance, level of risk associated with the food supplied and the response received. All non-conformances identified must be followed up with the supplier and suitably closed out.

Repeat audits should be carried out according to a pre-determined risk analysis, and further visits may be required as a result of a complaint, eg, foreign material contamination, poor quality or wrong specification.

Records should be kept of all completed supplier audits and these should be readily available.

Where purchasing is controlled centrally on behalf of a multi-site operation, a list of approved suppliers, including the type of assessment and document and records of previous assessments should be held at each site.

2.4 Traceability

Suppliers must be able to demonstrate full product traceability from purchase through receipt of goods, during storage and any secondary handling and through distribution and supply to Sodexo. Ensure product or packs are labelled and/or coded. This will require detailed record keeping of batch numbers and codes. The traceability must also include details of any rework.

The supplier must be able to demonstrate by a desk top exercise through their own audits, product recall tests or in another way that their traceability system is valid and reliable. This should include upstream and downstream traceability.

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The supplier must be able to demonstrate by a desk top exercise through their own audits, product recall tests or in another way that their traceability system is valid and reliable. This should include upstream and downstream traceability.

2.5 **Product authenticity**

An assessment should be carried out on all food raw materials to assess the potential risk of fraud/adulteration/substitution, based on evidence sourced from verifiable sources such as trade associations, government sources. The assessment should be reviewed at least annually and kept under review reflecting threats to the supply chain. Where raw materials are identified as being at particular risk of fraud/adulteration/substitution, product assurance and/or testing procedures should be in place to minimise the risk.

SECTION 3 RECEIPT OF GOODS & STORAGE

3.1 Receipt of goods

On arrival, all food and associated packaging must be inspected for signs of physical damage, infestation and compliance with the order and agreed specification. Chilled or frozen materials must be checked for compliance with agreed delivery temperatures. These temperatures must be compliant with the relevant UK & Ireland legal requirements. Further visual, analytical, physical and organoleptic tests should be carried out as required, dependent upon the product specification. Results should be recorded in a format to enable full traceability.

Raw materials must not be released for use in production until the foregoing checks have been completed and a decision taken on suitability for use. Raw materials, intermediate products and finished goods must be stored in clean, designated areas under defined storage conditions and must not be stored in contact with the floor. Allergenic raw materials should be stored separately from other ingredients.

Packaging materials should be subjected to similar goods inwards inspection and checked for compliance with specifications agreed for material type, dimensions, print accuracy and legibility. Particular note should be taken of the cleanliness and freedom from contamination of packaging and absence of any signs of infestation. Packaging should not be used until all incoming checks have been completed. Packaging materials must be stored, covered, in a clean, designated area to avoid cross contamination.

3.2 Stock rotation

All raw materials should be used in strict rotation and therefore a system is needed to date mark or code goods received.

The same principles also apply to the rotation of intermediate products and mixes which should be similarly marked. All products must be carefully monitored to enable full product traceability throughout the production process.

3.3 Unpacking, waste removal

Separate areas should be identified for unpacking or decanting materials into containers which will be used in production areas. Generally, materials should not be transferred to production areas in their original packaging as they may be dirty or otherwise contaminated. Food containers should never be placed directly on the floor unless specifically designed for this purpose.

Partly used containers should not be permitted unless they can be effectively re-sealed. Paper sacks should always be emptied into intermediate containers because they cannot be sealed to an effective standard.

Intermediate containers should carry batch identification for traceability purposes. Empty packaging should be removed from unpacking or decanting areas as rapidly as possible, without passing into any preparation or production area.

3.4 Raw / Ready to eat segregation

In high risk food operations (i.e. ready to eat products which do not require further heat treatment prior to consumption) there must be total separation of ready to eat and raw products to avoid the risk of cross contamination. There must not be route through which product can be transferred from low risk to high risk except by the defined process.

Ingredients and packaging required to enter the high risk section of the plant should pass through an unpacking and decontamination process before entry.

3.5 Allergens

Consideration should be given to adequate controls regarding raw materials and allergen management. Any allergen containing raw material or intermediate product must be suitably identified and segregated. It is a requirement that allergens are considered as part of the HACCP study.

SECTION 4 PRODUCTION CONTROL

4.1 Master manufacturing instructions

Manufacturing instructions should be provided for all operations carried out and should be in sufficient detail to enable anyone unfamiliar with the operation to understand how to manufacture the product. They should include ingredients, allergen information, recipes, operations, machines to be used, process control parameters, packaging, storage and distribution. They should also include HACCP instructions as necessary.

4.2 Finished product specifications

Finished product specifications should exist for all products and should be regularly reviewed and, where necessary, updated. In some cases the finished product specification may be similar to the manufacturing instructions with the addition of information on packaging, delivery and storage conditions. Product specification shall include allergen information.

4.3 Date coding / Stock rotation

It will be necessary to ensure adequate date coding throughout the production process, especially where ingredients may be prepared or mixed at different times for inclusion in the finished product. Whichever system is adopted care should be taken to ensure any labels used do not present a risk of foreign material contamination.

4.4 Out of date food

Out of date ingredients or ingredients the shelf-life of which is so limited as to expire within the expected shelf-life of the finished product, must not be used.

In association with point 4.3 it is essential that a 'First In First Out' system be used throughout the food chain, from your own suppliers to despatch to Sodexo. No finished product which has exceeded, or is close to, its durability date may be used to supply Sodexo.

All out of date food must be clearly labelled prior to being destroyed. Relabeling with fresh dates will be viewed as fraud.

4.5 Contamination risks

Cross-contamination risks must be eliminated throughout the entire production process. Particular care must be taken to prevent contact between finished and 'raw' products. (Please refer to further guidance in the product specific supplement). Production planning must also consider potential cross contamination of allergens.

4.6 Chilled environment

For chilled production areas the temperature levels should be taken regularly, noting the calibration requirements of section 4.10. The target temperature and acceptable tolerance for each area should be included on the recording sheet, or displayed next to the indicating equipment so that it is immediately obvious if the temperature is outside normal limits.

Temperature records should indicate where a reading is outside specification and should contain a note of the action taken to correct the fault.

4.7 Material flow, hold-ups

Materials should generally flow through the process with a minimum of delay. Should there be a build-up of materials, the quantities transferred into production at any time should not exceed that required for proper flow.

Staff should not be permitted to defrost, unpack or unwrap more raw material than can be used in a reasonable time and should not produce intermediate batches in excess of immediate requirements.

4.8 **Intermediate storage**

Where there is a need to store part-prepared or intermediate product, such as ingredient mixes, the product should be treated as if it were a finished product, particularly with regard to temperature control and contamination risks.

Any partially processed materials or intermediate mixes should be stored in appropriate covered containers, and should be marked up with appropriate batch identification to ensure traceability. Rework should be controlled and its traceability included in any batch records.

4.9 **Breakdown procedures**

In the event of a plant breakdown causing part processed materials to be delayed a procedure is required to ensure that operators know what action to take. Depending upon the process involved, it may be important to keep intermediate mixes either above or below certain temperatures. Specific timescales should therefore be established after which mixes or unfinished product must be discarded. This must be documented and communicated to the operators.

4.10 **Calibration tests**

All weighing equipment used to control the composition of product and the quantity of product despatched must be calibrated at least weekly using suitable, stamped weights. Results must be recorded, and current certificates retained.

Calibration checks must be carried out on all temperature measuring equipment at least monthly as per your pre-requisite programme.

In all cases, records of calibrations and verifications are to be maintained. A documented procedure for all temperature monitoring is required as part of the suppliers haccp system.

4.11 **Temperature tests**

Having calibrated all temperature measuring equipment, regular checks should be made of the temperatures in all refrigerated intake, storage, preparation, production, finished product and despatch areas. All such checks should be recorded, unless an automatic, calibrated, recording system is in place, in which case a print out from the system must be fully available for inspection. Records should be available for inspection for at least a year, or the shelf life of the product, whichever is the longer.

When production is not continuous as a minimum temperature checks should be undertaken before the start of production. Actions taken as the result of refrigeration failure should be recorded.

4.12 **Shelf life testing**

Reference samples of all high risk chilled and frozen products or product types manufactured should be taken at suitable intervals and kept for the shelf life of the product. These samples should be examined during and at the end of the shelf life and the results used to review the shelf life declared.

4.13 **Weights and measures**

Records must be available to confirm the weights of product despatched and their composition. Records may be made manually from non-automated systems, or from print outs from in-line check weighing equipment. Reports from enforcement authorities should be available for inspection.

4.14 **Packaging materials**

Packaging materials should be suitable for the purpose and should be stored in a clean, designated area where they are secure against contamination and pest infestation. Boxes and cartons should be free from staples.

Packaging materials and packaging storage areas should never be used for any purpose other than that which is intended and certainly never be used to store cleaning materials or engineering parts and materials.

4.15 **Product labelling**

All products must be labelled in accordance with relevant legislation and the full labelling requirement for retail foods should be applied to food supplied to Sodexo. Labels should include:

- the name of the food
- preparation/cooking instructions
- allergen information
- storage conditions prior to opening
- storage conditions after opening
- the shelf-life on each individual portion
- the shelf life written in day/month/year
- the name and address of the supplier
- the quantity contained in the package
- the production date or code
- products previously frozen must also state for example 'Previously/Frozen – Do Not Re-Freeze'

'Use By' and 'Best Before' dates must be determined using a sound protocol. Where bar codes are applied to products they should conform to industry codes of practice.

All allergenic ingredients must be identified on the label according to relevant legislation. Where cross contamination from an allergen cannot be prevented the label will include a warning message. National guidelines or codes of practice must be applied when using such a warning statement.

If gelatine is used, the type (animal or vegetable) and the species (if animal: beef, pork, etc) must be specified.

Labels should be easily legible and in English.

4.16 **Laboratory testing of product**

Where Sodexo is supplied with high risk products (ready to eat foods that do not require further heat treatment prior to consumption), a microbiological sampling programme should be established to verify that products and processes meet both legal requirements and product specifications. All microbiological testing must use methods of analysis traceable to National Standards and be accredited by UKAS or CLAS. Any pathogen testing must take place in a laboratory completely isolated from production facilities.

In-house laboratories should have adequate staff that are qualified and experienced to a suitable level for the work undertaken. Results of all samples tested should be easily referenced to incoming inspection data.

While it is not necessarily practicable to test every batch of product or every surface after cleaning, regular laboratory analysis data can be accumulated to provide assurance about overall standards.

Tolerances for all specifications should be provided, together with a clear written procedure for the action to be taken when samples fall outside the tolerance levels, including provision of information to Sodexo on relevant products. In the event that results demonstrate unsafe or unfit product supplied to Sodexo, Sodexo must be informed via a telephone call to Supply Solutions and the relevant buyer.

4.17 **Changes to production site**

You must inform Sodexo Purchasing Vendor Governance department and buyer about any change to your production site, including change of location, and key personnel. You must also inform Sodexo if there are multiple sites supplying Sodexo.

SECTION 5 FOREIGN MATERIAL CONTROL

5.1 Foreign materials

Extreme care must be taken to ensure that the risks of contamination of the product from either the building, plant or raw materials are as low as is reasonably practicable.

Only materials and items which are essential for the operation in hand should be present in production and storage areas. This should include an absence of loose papers, unused or broken plant and equipment, personal items.

5.2 Use of wood

The use of bare wood as part of the structure should be avoided wherever possible and is not acceptable in food production areas unless it is properly covered or treated so as to make it easy to clean and prevent contamination hazards. Shelving or racking should be of metal or plastic. Wooden pallets or other containers shall be avoided in production and storage areas.

Raw materials or packaging materials delivered on wooden pallets should be transferred to plastic or metal alternatives before being taken into production areas. Products despatched on wooden pallets must not be packed in an area containing open food.

Wooden pallets shall be maintained in good condition.

5.3 Use of glass and brittle plastics

A clear documented policy concerning the use of glass and brittle plastics and breakage thereof must be in place. No glass must be taken into production areas where a breakage could result in contamination of food or equipment.

Wherever possible, raw materials should be supplied in containers composed of materials other than glass. Where this is not possible, a separate unpacking area should be provided away from the production area to transfer items into another container prior to use. Any product decanted from a damaged glass container must immediately be discarded.

Equipment or instruments containing glass must not be taken into production area and all permanently fixed gauges should have glass replaced by other materials. NB: items finished in vitreous enamel are similarly prohibited.

Where it is impossible to use an alternative to a breakable material, a glass or breakables register must be compiled and should note the location of all such materials. These should be regularly checked for damage or breakage, these checks must be recorded. Records must also be kept of all glass breakages and the actions taken.

5.4 Personnel

Personal belongings should not be taken into production areas. Protective clothing should have no outside pockets or buttons. Checks should be made on all fastenings following laundering to ensure that they are secure. Pens should be one piece, easily visible in the product and / or metal detectable.

Goggles, where used, should be shatterproof and of such design and construction that no small parts can become detached. Goggles and other PPE should be inspected regularly for damage. Where hearing protection is mandatory, or is provided for the comfort of the employees, it should consist of either linked plugs or muffs. Ear plugs should be metal detectable, blue and linked together with a plastic cord. Ear muffs should be kept clean. Where checks are made on these personal items, records should be maintained.

Production staff must be made aware of the need for vigilance during food operations and to check for potential foreign material contamination. Any foreign material contamination should be investigated. If identified as being sourced from a raw material, this should be used as part of the ongoing supplier monitoring programme.

5.5 **Metal detection**

Systems must be in place for controlling risks of metal contamination of food and must be identified within the HACCP process.

In the majority of circumstances, suppliers who manufacture or process food will be required to provide metal detection facilities, particularly where mechanical processes are involved, such as mixing, mincing, slicing or dicing. Suppliers who simply distribute a product should ensure that the product specification includes metal detection prior to despatch.

Metal detection systems should be placed as close to the finished product stage of the operation as possible, taking into account limitations of the packaging. Automatic rejection systems should be used where possible and these should also be checked for efficiency. An audible or visible alarm should always be part of the rejection system, and it should not be possible to re-start the system except by the use of a key, access to which should be restricted to authorised personnel.

Metal detection systems should be checked at least hourly to ensure they are operating correctly and at changes of product. Tests should be made with ferrous, non-ferrous and stainless steel test pieces, as supplied by the equipment manufacturer. For products containing aluminium as part of the packaging a ferrous-only test piece will be used.

Procedures should exist for dealing with rejected product, which must not be returned to the production flow, and the reason for rejection investigated and recorded. Records of checks should be kept together with records of investigations carried out to determine sources of contamination.

5.6 **Other foreign material control**

Dishcloths, metal scourers and wire wool must not be used.

Notice boards should be kept to a minimum and where provided, should be fitted with shatterproof plastic covers. Drawing pins (or similar) and adhesive tape should not be used to fix notices.

Recipes or operating instructions should be laminated. Papers required for record keeping should not be held together by paper clips or staples and should be kept in a plastic cover.

Cleaning equipment, conveyor belts and other breakable item, should be inspected regularly for damage and broken or fraying items replaced.

Maintenance and repairs to equipment should ideally happen outside of production times, however, where this is not possible, care should be taken to ensure that all items are accounted for and that the equipment and area have been cleaned to an acceptable level and there is no risk of foreign body contamination from maintenance plant or equipment.

SECTION 6 DISTRIBUTION

6.1 Stock rotation

A formal stock rotation system should be in use to ensure that products are distributed in correct sequence and with adequate product shelf life.

6.2 Finished products holding area

Finished products must be held in a defined area prior to despatch. The storage conditions for products will depend on the nature of the product and may be ambient, chilled or frozen. Finished product areas must not contain any other materials or be used as a general store. Stacking in warehouses should allow for inspection for signs of infestation.

6.3 Condition of outgoing loads

Outgoing loads should be inspected for general condition, labelling, pallets, stacking system, stretch or shrink wrapping and general appearance. Checks should include conformance to despatch documentation and, where appropriate, temperature before being despatched. Records of this final inspection should be kept.

Delivery cages must be loaded in such a manner that ensures products are protected from risk of contamination and physical damage. Distribution vehicles should be loaded (and unloaded) from enclosed or covered bays to protect the finished product. Ideally, loading hatches should form an effective seal between the vehicle and loading bay.

In most cases and in particularly for health and safety reasons, heavier goods will be stacked at the bottom of cages and lighter goods at the top.

6.4 Distribution traceability

Traceability systems should be such that it is possible to determine the destination of batches of finished product. This may be a manual system or part of a computerised distribution system.

Where product is made strictly to order, the order and despatch documentation must provide the necessary traceability.

6.5 Vehicle condition and cleanliness

All vehicles used for distribution should be appropriate for the type of product supplied and should comply with all relevant legislation and codes of practice. They should be kept in good condition and cleaned and maintained according to a planned schedule. Records should be kept of all cleaning and maintenance activities on vehicles.

Vehicles should be subject to regular inspection to ensure there are no risks of product contamination (e.g. from pests, taints or broken glass).

6.6 Vehicle refrigeration

Temperature controlled product should not be loaded on to vehicles until the temperature of the compartment is at or below the intended temperature for transport. This temperature should be recorded.

Where chilled or frozen products are being transported, regular checks should be made on the temperature of the vehicle during the distribution journey. Vehicle temperature checks should be taken before loading to ensure the normal operating temperature has been achieved. Where automatic temperature logging equipment and/or printing equipment is used a printout should be obtained at the end of each journey.

Refrigeration units on distribution vehicles should be covered by contract maintenance arrangements and appropriate records should be available. The temperature of chilled foods on delivery to Sodexo must be 5°C or colder. An allowance will be made for slight upward temperature variations which may arise during delivery rounds but product will be rejected if the delivery temperature exceeds 8°C, (5°C ROI). Frozen foods should be delivered at minus 18°C or colder.

Sodexo premises will reject food products if warmer than minus 15°C (-18°C ROI).

6.7 Control of returned food

A clear system must be in place for the management of returned foods whether due to incorrect ordering/picking or customer rejection. Returned foods shall be clearly identified and segregated from other products.

No foods returned due to temperature or other abuse (or customer rejection associated with such abuse) must be reused in any way to supply Sodexo.

Irrespective of the preceding paragraph, reuse of foods, including reworking, must be clearly identifiable and must only be done if in full compliance with a documented HACCP procedure.

Returned products must not be re-labelled in any guise and/or re-supplied to Sodexo.

6.8 Complaint procedure

A procedure must exist to deal with customer complaints and must provide for analysis of complaint data so that trends can be established and preventative action taken. The procedure must deal with the immediate problem of a defective product and seek to rectify the situation as rapidly as possible.

Following rectification of the immediate problem an investigation must be carried out into the cause of the problem and action decided upon to prevent a recurrence. Details of investigation and action taken should be recorded.

6.9 Product recall procedure

A fully documented product recall procedure must exist. This should provide details of employees in the company who are authorised to initiate a recall, how they may be contacted, how customers will be traced using the distribution traceability system and information about how customers suspected of having received defective product, will actually be contacted. Customers in this context may include distributors.

Preparation of standard recall notices which can be emailed or faxed to customers should be included in the system. The system should be tested annually and, where necessary, modified to ensure that it will work as intended should the need arise. A written record of the annual test should be retained.

The responsibility for initiating and progressing a recall lies with the supplier. Following a recall decision, regular progress reports are required as well as a written report to confirm the recall action taken, the investigation carried out to determine the cause of the problem and the action taken to prevent a recurrence. Communication of the complaint to the workforce is an important part of the investigation and preventing future incidents.

6.10 Communication of allergen information

All pre-packed food must contain allergen information on the product labels as defined in legislation. Allergen information must accompany any food supplied loose.

SECTION 7 STAFF TRAINING

7.1 Food hygiene and HACCP training

All food handling staff must be trained to a level which is commensurate with their work activities, but should generally be to at least the equivalent to Level 2 Award in Food Safety. This may be completed by one of the recognised bodies such as CIEH, RSPH, or may be in-house providing it is to the same level and includes an assessment of competence.

Records must be kept of all training and plans should be made to carry out formal refresher training at intervals of not more than three years.

Basic induction training should be carried out on commencement of employment and then more formally within the next three months. All new food handling staff should be closely supervised and placed into areas where there is less risk. Staff must not work in 'high risk' areas until they have been appropriately trained.

Records shall be maintained demonstrate that the staff in charge of controlling HACCP and implementing HACCP have had relevant training. Production staff shall be trained on critical control points relevant to them, e.g. temperature monitoring.

Procedures must be in place to ensure that agency or temporary employees who handle food are also appropriately trained for the task required and are closely supervised.

7.2 Enhanced food hygiene and HACCP training

Managers, supervisors, quality assurance and hygiene management staff should be trained to a higher level than basic, ie, Level 3 or 4. This should be appropriate to the nature of the product and the associated risks.

7.3 Distribution staff training

Distribution staff should be trained in food hygiene to a level appropriate to their duties. Where high risk chilled and frozen products are being delivered the training will normally be to the basic food hygiene certificate level.

7.4 Quality awareness training

All staff should be given training to enable them to carry out their jobs effectively. This will generally have a direct or indirect influence on quality.

Training plans should be prepared to highlight training needs, following discussions with employees, supervisors and management.

7.5 General communication of food safety information

Policy and other information affecting food safety or hygiene should be communicated to all staff in an appropriate manner. This may include information of food safety / quality policies, quality management, personal hygiene standards and food related diseases.

SECTION 8 ENVIRONMENTAL & MAINTENANCE STANDARDS

8.1 Design and layout of facilities

The design of facilities should allow sufficient space for the operation, in a suitable location away from sources of contamination and should have adequate services.

The layout of the facilities should present a logical flow of materials through the operation from raw material intake to finished product despatch. Properly designated areas should be provided for the various activities, including storage, processing and packing.

Clearly defined routes for employees are required together with appropriate staff facilities. The entire layout should be such that the risk of cross contamination of finished product by raw material is minimised. This may be achieved by the use of high and low care areas to separate personnel working with ready to eat and raw product.

8.2 Condition of machinery / utensils / equipment

All food contact surfaces must be food safe and easily cleanable. Non-contact surfaces should be easy to clean and if painted should be free of any flaking paint or rust. However, painted surfaces should not be used directly over open food. Stainless steel finishes are preferred.

Machines should be constructed to be easy to dismantle, inspect and clean. They should be substantially free of dead areas or traps where dirt and/or water may lodge. Supporting frames should be of sealed construction and horizontal cross members should be angled. Horizontal surfaces should be eliminated where possible.

Conveyors should not pass over open food. Conveyor surfaces should be smooth and should not be worn at the edges. Slat and hinge type conveyors should not be used in wet production areas.

Tanks and vessels should be suitable for the purpose and all inspection hatches tight fitting.

Pipework must be arranged so that there can be no product left in dead sections and should be self draining following cleaning. Lagged service pipes should be encased in sealed plastic or metal sleeve. Sieves and filters should be fitted in bulk handling and conveying systems and should be inspected regularly.

8.3 Condition of structural surfaces

The condition of structural surfaces must be suitable for the operation being undertaken and be in full compliance with legislation currently in force. In wet processing areas, surfaces will be smooth, impervious and easy to clean. In dry storage areas water resistance is less important but finishes should still be smooth and easy to clean.

8.4 Ventilation (air conditioning)

Where areas are required to be temperature controlled (all production and storage areas for perishable materials) the temperature should generally be maintained at or below 10°C. There should be temperature indicators clearly visible and temperatures achieved should be recorded.

Air supplied to high risk product areas should be under positive pressure and be microbiologically filtered. Pipework should be provided to carry away defrost water and condensate. It should terminate outside the controlled area and not be allowed to form pools on the floor.

8.5 **General temperature control**

In areas not requiring air conditioning, ventilation systems should be provided to create a comfortable working environment and to prevent a build-up of condensation. Processes generating heat or steam should have local extraction hoods or canopies. It is not acceptable to rely on open doors or windows and mechanical systems should be designed to provide for air flow without causing draughts.

General heating in production areas should be by warm air or radiation. Direct combustion heaters should not be used.

8.6 **Lighting standards**

Lighting must be adequate for the operation being carried out and must be protected with shatterproof covers / diffusers. Domestic or office type diffusers are generally not suitable and all lighting in wet processing areas should be sealed and waterproof. Lighting fixed in a suspended ceiling must be protected by a plastic panel which should be smooth and easy to clean on the underside.

For some types of halogen or high temperature lighting where it is not possible to fit plastic covers, a fine mesh cover should be provided to contain any breakages. Lights must be kept clean and should be included in cleaning schedules.

8.7 **Water supply**

Water for all uses (except indirectly in heat exchangers and for steam raising) must be potable and from a mains source, or treated and chlorinated if from any other source. Water from sources other than mains should be subject to regular microbiological and chemical analysis to confirm its quality. Results of mains water quality should be obtained from the supplier. Recycled water should not be used, except for indirect applications not associated with food processing. Water for cleaning purposes should be of potable quality. Water storage tanks should be covered and cleaned out on a regular basis. Fittings should be compliant with Water Supply (Water Fittings) Regulations 1999.

8.8 **Internal drainage and gullies**

Floors must be constructed so that water flows towards drains and prevents standing pools of water. Drainage channels should be wide, smoothly finished and fitted with removable covers which are non-corroding. They should be provided close to, but not under, machines likely to cause spillage. Kerbs should be provided around machines where there is likely to be heavy discharge of water or product on to the floor.

Grease / fat traps or other interceptors should be sited outside the production area and the cleaning of these must be included in the maintenance programme.

8.9 **Waste disposal arrangements**

Adequate waste disposal arrangements should be made for both food and non-food waste. Packaging and general waste should be kept in covered containers and contractual arrangements made for them to be emptied regularly.

Food waste should be stored in closed containers, preferably under chilled conditions, until it is collected, preferably daily. Areas for the storage of waste should be as far away from the premises as practicable and kept clean. This area should be included on the cleaning schedule.

8.10 **Waste disposal receptacles**

Waste disposal receptacles inside the plant should be clearly identifiable. They should be emptied frequently and cleaned according to a pre-determined plan.

Disposal bins for used paper towels should be sited at all wash stations and should be cleaned regularly. Plastic bags are recommended for the storage and transport of general and packaging waste from the production areas to the disposal points.

8.11 **Packaging waste**

Means must be available to determine and record the amount of packaging materials used and passed on to customers. Records must be kept of the weight of any packaging materials for which an obligation will be passed to Sodexo.

Sodexo will require by 31st January each year an accurate weight in metric tonnes of the amount of such materials supplied in the previous calendar year, whether or not suppliers are themselves obligated by the regulations. The materials concerned at present are plastic, aluminium, steel, glass, paper and cardboard.

8.12 **Pest control and prevention**

A documented pest control process should be available as part of your HACCP.

A pest control contract providing for at least six visits per year to inspect and treat for rodents and insects in all areas is required. The contractor must be a member of the British Pest Control Association. Only approved pesticides should be used and baits should be placed so that they are not disturbed by normal production activity and will not contaminate food. Written reports of findings should be provided by the contractor. Any recommendations on proofing and housekeeping matters reported by the contractor must be actioned.

Electronic insect killers should be sited inside the plant to deal with any flying insects that may enter the building. They should be regularly emptied and cleaned. Tubes should be changed annually, or in accordance with the date codes printed upon them, irrespective of whether they are still emitting visible light. The units should be positioned away from and not immediately above open food areas and advice should be sought from the suppliers about the optimum location and number.

Crawling insect and moth detectors should be used to measure activity before deciding on areas to be baited. Pest prevention is more effective than pest control and all staff should be aware of the principles of pest prevention. All areas should be kept free of rubbish; all exterior doors should be self-closing, well fitting and be kept closed. All open able windows should be suitably fly-screened. All maintenance work should be checked to ensure there are no access points for pests and all alterations or modifications to buildings and plant must be carried out with the aim of excluding pests. Possible access points should be examined regularly, including roof eaves, drainage gullies and gutters.

There should be no evidence of pest activity and any materials that have been damaged or contaminated by pests must be discarded.

8.13 **Dispatch area**

A defined despatch area should be provided which is preferably separate from the raw material intake area. Where there is a single intake and despatch area, only one activity should be carried on at any one time, or the area clearly divided.

The structure of despatch areas should be similar to intake areas, ideally with sealed docking facilities.

8.14 **External yards, etc.**

Yards should be of adequate size and accessibility to permit easy access to delivery and despatch vehicles, together with vehicles arriving to remove waste.

Yards should be kept in good repair, and should have adequate drainage. They should not be used to store unused plant and equipment, and raw materials and packaging should never be left stored in yard areas.

8.15 **Perimeter**

In addition to yards, the entire perimeter of the building should be kept clean and tidy. A concrete or paved apron of at least one metre in width should be maintained around the building and should be kept free of vegetation or other materials to deny harbourage to pests. Note should be taken of the activities of adjoining premises and the co-operation of neighbours may be required to prevent rubbish or other materials entering the site from nearby premises.

8.16 **Vehicle washing area (facilities)**

Facilities on site should be available to clean both the inside and outside of delivery vehicles. Power washers are preferable to clean the outside of vehicles and an area should be provided in the yard with adequate drainage for this activity.

Cleaning the inside of the vehicles depends on the product supplied but must be to a standard that will ensure food safety.

Cleaning schedules for vehicles should be prepared and the effectiveness of cleaning should be monitored and recorded.

8.17 **Planned maintenance schedules**

Planned or contract maintenance arrangements should exist for all key items of plant and equipment. Contract maintenance will generally include refrigeration and major items of production plant. The schedule or contract should specify the number and frequency of visits annually, together with a full description of what is covered and what is excluded. Internal planned maintenance procedures will include regular checks for breakage or damage to plant and equipment.

8.18 **Maintenance records**

All maintenance carried out on the plant or equipment should be recorded. In the case of work carried out by a contractor this may be in the form of invoices. Where work is carried out by an employee, a maintenance record should be kept, which as a minimum should record information on the date, time, location and nature of the work done.

8.19 **Pre/Re-commissioning checks**

Before any piece of equipment is put into production or returned to production following repair, it should be checked for engineering integrity and for appropriate hygiene standards by a suitably qualified person.

Checks should be carried out for loose nuts, bolts, screws, and for lubricants, swarf and tools. A signed record should be kept of the checks carried out.

8.20 **Breakdown procedures**

Written procedures should exist to deal with breakdowns. Rules should exist regarding working on breakdowns during production hours, and the minimum distance to be maintained between repair work and an operating production line, and in particular if work is above production areas or equipment. Whilst in storage or production areas maintenance staff must wear over clothing commensurate with ensuring food safety.

Attention should also be paid to any effect on the product caused by breakdown of plant or equipment.

8.21 **Air conditioning plant**

Air conditioning plant should be subject to separate maintenance, which should include appropriate dosing of wet cooling tower systems with anti bacterial and anti fungal treatments. Records should be kept of all such treatment, and water should be tested regularly for quality.

SECTION 9 CLEANING STANDARDS

9.1 **Cleaning schedules**

Documented cleaning schedules must be available and should cover all aspects of the operation, including yards, vehicles, and personnel facilities. As a minimum, a schedule should contain information about the frequency of cleaning, the materials to be used, methods of use, contact times, rinsing, safety and dilution rates of cleaning agents, the equipment to be used and the responsibility for the cleaning operation.

Schedules may be displayed in a prominent position in the production areas and should be appropriately protected.

9.2 **Monitoring systems**

Cleaning schedules should be monitored daily and a record kept. The record may be combined with the schedule or may be a separate document.

Details should be kept of all areas cleaned with an indication of any deviations from expected standards and the remedial action required. Monitoring records should be signed and retained for at least 3 months.

Cleaning standards should be assessed not only by daily visual checks but also by microbiological analysis using conventional swab techniques or approved rapid assessment techniques. Areas such as cutting boards, mincing, mixing, slicing and dispensing equipment should be subject to routine swabbing and bacteriological analysis to check the effectiveness of cleaning and sanitising procedures.

9.3 **General standard of cleanliness**

Cleanliness of the premises as a whole, including staff facilities, must be maintained to a very high standard with evidence of a clean as you go regime.

Sanitising must form part of all cleaning associated with food contact surfaces and equipment.

Areas such as cutting blocks, mincing, mixing, slicing and dispensing equipment should be subject to routine swabbing and bacteriological analysis to check the effectiveness of cleaning and sanitising procedures.

9.4 **Utensil washing**

Specific facilities should be provided for washing utensils and small machine parts. These should be provided with hot and cold running water, together with sinks or troughs of appropriate size to enable equipment to be washed properly. Detergent and sanitiser must be available and used.

9.5 **Segregation of utensil / hand washing**

Separate washing facilities must be provided for hand washing and cleaning utensils and these facilities should be marked accordingly. It should be made a disciplinary offence for anyone to use the incorrect facilities.

9.6 **Separate cleaning/food handlers**

Ideally, separate staff should be employed to carry out both production and general cleaning. This may be achieved by the use of contractors or by employed staff. Where contractors are used, a written agreement should exist which sets out the standards required and these should be monitored.

Where staff that are also food handlers are used to clean, they should change protective clothing between undertaking cleaning duties and food handling unless carrying out the task at the end of a shift. If they are required to take waste materials outside the production area, clean protective clothing must be worn on return to food handling duties.

All staff that have cleaning responsibilities must be suitably trained including chemical use and dilution, and cleaning processes.

9.7 **Housekeeping standards**

Housekeeping standards should be maintained to a high level. This should include a clean-as-you-go regime which prevents a build up of working 'dirt' around production machinery and keeps the amount of raw material in production areas to a minimum.

Good housekeeping also includes the prompt removal of packaging and food waste from the production area.

9.8 **Cleaning equipment maintenance / condition**

The type of cleaning and hence cleaning equipment will depend on local factors and may include foam, high pressure, in-place or manual. All cleaning equipment must be kept clean and in good repair. Cotton or other fabric cloths should be avoided as they are a common source of foreign material contamination.

Brushes should have nylon or otherwise 'non-absorbent' bristles and handles should not be made of wood. Colour coded equipment is preferred to minimise the risk of cross contamination, especially in high risk areas. Similarly, separate shovels should be used for food materials and waste products.

Defined storage areas should be provided for cleaning utensils, enabling them to be stored off the floor in suitable racks.

9.9 **Cleaning chemicals**

Chemicals available for cleaning should be suitable for the type of contamination to be removed, should be non-tainting, suitable for food industry use and be stored and used in accordance with the recommendations of the supplier.

Cleaning chemicals should be stored in a lockable cupboard or area with restricted access to nominated employees only.

9.10 **Application of COSHH**

Product data sheets containing information on health and safety should always be available where the cleaning chemicals are stored. Adequate and appropriate protective clothing should be provided and should be checked and cleaned regularly. Training should be provided for all employees using cleaning chemicals and records should be kept of the training given. In particular staff should be made aware of the risk to food which may be associated with the use of cleaning or other chemicals.

9.11 **Cleaning Checks and Analysis**

A system should be established to monitor and check the standards of cleaning, this should include a close out of issues. Results of the checks should be regularly analysed for trends. This should be documented.

SECTION 10 STAFF STANDARDS

10.1 Pre-employment medical screening

Food handling staff should not be employed before they have been medically screened. Screening may be carried out by means of a questionnaire or a medical examination and this will depend on the nature of product being handled.

In some circumstances a doctor may need to be consulted regarding the suitability of a food handler before employment is allowed to commence. Records of pre-employment screening should be retained.

10.2 Screening after certain illness

Employees must notify the company as soon as they become unfit for work through illness.

Employees who return to work following sickness absence should be required to complete a questionnaire to confirm that they are free of any respiratory, skin or gastro-intestinal conditions.

Where an employee has been suffering from one of the above conditions, employment should not be allowed to re-start until they have been symptom-free for 48 hours and/or have received clearance from a doctor.

10.3 Screening after foreign holidays

Employees should be required to declare when they have visited countries outside the UK either for holiday or other reasons. In such cases employees should complete a return to work declaration confirming that they have not suffered from any gastro-intestinal symptoms during the visit.

In all cases above staff should understand that to make a false declaration will be treated as a disciplinary matter.

10.4 Staff personal hygiene

All food handling staff should demonstrate good standards of personal hygiene, be of a tidy appearance and comply with all legal and company rules designated to provide for the production of safe food.

As with any food business regular hand washing is essential and staff must ensure that they wash their hands before starting work, after any break and frequently during the day.

10.5 Jewellery / make-up

Jewellery should not be permitted, except for a plain wedding ring. Jewellery worn for religious purposes should be covered or otherwise to protect the food from the risk of contamination.

Nail varnish, nail extensions, eyelash extensions, false eyelashes and similar items should not be worn and strong perfumes and after shaves should not be permitted.

Only prescription spectacles are allowed, and wearers of contact lenses should declare their use and both should undertake to report any loss at work.

10.6 Protective clothing

Protective clothing must be worn by all food handling staff and visitors. Protective clothing should be appropriate for the type of food being handled. Clothing should be of light colour with no outside pockets and be easily laundered. In some cases a range of colours may be needed to differentiate personnel in different areas, such as in high care.

Metal fastenings and buttons should be avoided. Checks should be made on all fastenings following laundering to ensure that they are secure. Garments should be of appropriate design to completely cover employees own clothing and any clothing such as thermal jackets supplied for cold environments.

Beards should be covered by snoods.

Suitable footwear should be provided and be waterproof for use in wet areas. Gloves should only be used where essential or for safety reasons and should be changed regularly. The use of disposable gloves is preferred. These should be changed and hands washed at appropriate time periods. Staff should remove their protective clothing before they use the toilet or take a meal or drink break.

Storage of clean laundry, if not in individual lockers, should be in a location where they are not exposed to the risk of contamination before use. Head coverings should either be capable of covering all the hair or should be worn in conjunction with a hair net to cover the hair completely. Hair nets should be colour coded. Hair grips or other devices should not be used to secure the head covering.

Layout of operations should be such that it is not possible to enter a preparation, production or packing area unless correct protective clothing is in use.

10.7 **Work clothing not taken home**

Protective clothing should not be taken away from the premises except to be cleaned by, for example, a laundry contractor. Footwear worn in production areas should not be worn to and from work.

10.8 **Access restrictions**

Staff should not be permitted to leave the premises to work outside unless protective clothing is changed as they re-enter the production area. This applies especially to staff taking waste outside for disposal.

10.9 **Hand washing facilities**

Suitable and sufficient hand washing facilities must be provided and will be appropriate for the type of business and nature of food being handled. They should be located close to, and ideally just before, the entrance to production areas, preferably in a lobby. Hand washing facilities must also be provided in all toilets.

Hand washing facilities should consist of a supply of running water at a temperature which is comfortable (around 45°C), supplied through a thermostatic mixer and controlled automatically (electronic eyes) or by knee or foot operated taps. Liquid bactericidal soap from a dispenser, and either centre pull or folded paper towels together with a foot operated pedal bin for used towels is required. Towels should be of a colour which contrasts with the colour of the product. Hot air dryers and linen towels are not permitted. After washing with soap, and drying, hand sanitisers are recommended.

10.10 **Nailbrushes**

Nailbrushes may be required in certain food business where hands can become particularly soiled. When provided, they should be of plastic and nylon construction and kept clean. A system for their regular cleaning, sanitation and inspection is needed. The condition of nailbrushes should be included in the monitoring of cleaning standards. Employee's nails should be kept short and clean.

10.11 **Smoking policy**

A smoking policy should be developed, to take account of the wishes of the workforce. Generally the long-term aim should be to make the entire site a non-smoking one. Smoking materials must not be taken into storage, preparation, production or packing areas and notices to that effect should be prominently displayed. Notices should also be displayed banning spitting, eating and drinking in food preparation and handling areas.

10.12 Toilet facilities

The number of toilets and wash basins should be appropriate to the number of employees. They must be maintained in good working order, kept in a clean hygienic condition, should be ventilated and should not open directly into a food room, storage or packing area.

The materials of construction and design should be such that they can be easily cleaned. Notices instructing staff to wash their hands after using the toilet should be prominently displayed on the rear of the door to each cubicle and in a position where it will be seen by employees leaving the toilets.

10.13 Showers

Showers should be provided for employees who are working in hot or dirty conditions. They should be maintained in a good state of repair. Showers, toilets and cloakrooms should be included in cleaning schedules.

10.14 Cloakrooms

Lockers and changing room facilities should be sufficient for the number of staff employed and should be constructed and maintained to a high level. All employees should have a locker in which to store outdoor clothes. Lockers should be kept in good order and rubbish should not be allowed to accumulate on, under or behind them.

Bins should be provided for dirty protective clothing removed at the end of the shift and should be stored while awaiting collection in such a way that it cannot contaminate clean clothing.

10.15 Canteen/refreshment facilities

A separate area should be provided for rest periods and for refreshments - food production areas must not be used.

10.16 First aid provision

Suitable and sufficient first aid facilities should be provided and it is recommended that at least one trained first aider should be available during production hours. Dressings should not be applied in production areas. First aid boxes should be regularly checked to ensure that the items are at the given stocking level and within the shelf life, if appropriate.

10.17 Wound dressing

Wounds should be dressed with blue, metal detectable waterproof plasters

If the injury is to a finger, a fingerstall should also be used. Pads and bandages should be covered with blue waterproof metal detectable tape if too bulky to be covered with a finger stall.

10.18 Accident recording and investigation

All accidents should be recorded, and investigated noting sufficient detail about the causes and nature. All dressings issued should be logged, and all staff who are given first aid treatment instructed to report the loss of any dressings immediately.

10.19 Hazard spotting

All staff should be encouraged to spot hazards to the product and to report problems, eg, poor housekeeping, risk of contamination from a machine part, or evidence of possible pest infestation.

Credit should be given to employees who identify and report potential, or actual, hazards.

10.20 Ergonomics

All work areas should be assessed to ensure that it is ergonomically sound to prevent staff suffering from muscular skeletal issues.

PRODUCT SPECIFIC CODES

WHOLESALE AND DISTRIBUTION

INTRODUCTION

This section identifies the areas of the code that are relevant to suppliers who solely store food and/or distribute food with no food manufacturing or repackaging activities. This includes importers, wholesale cash and carry companies, and wholesale distribution companies including retail and catering suppliers and delivered wholesale distributors.

Wholesale and distribution suppliers must comply with the requirements of sections 1 to 10 of this document. However, where no food processing takes place not all the requirements in section 4 are applicable.

BROKERS & AGENTS

INTRODUCTION

This section identifies the areas of the code that are relevant to suppliers who act as:

- Brokers – companies that purchase or ‘take title to’ products for resale to Sodexo
- Agents or non manufacturer service providers – companies that trade between a manufacturer or broker and Sodexo, but do not at any point own or ‘take title to’ the goods

Brokers and Agents must comply with the requirements of sections 1 to 10 of this document but excluding section 4.

SUPPLY OF TEMPERATURE STABLE (AMBIENT) PRODUCTS

INTRODUCTION

This section contains specific information regarding the supply of temperature stable products to Sodexo and must be read in conjunction with the requirements of sections 1 to 10 of this document.

Temperature stable products include those that are dried, canned, or otherwise processed so that bacteria are eliminated or bacterial activity is inhibited and will therefore have a prolonged shelf life.

The section is based not on minimum legislative requirements but on Industry Guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Purchasing

Every effort should be made to ensure, so far as reasonable practicable, that products are free from microbiological and foreign material contamination. Flours, pulses and specialty dried goods may be sources of pathogenic bacteria, such as Salmonella, E.coli and other pathogens. Nuts, dried fruits and snack products may be contaminated with moulds or pathogenic organisms, including mycotoxins. Therefore, all products must be purchased from reputable suppliers, preferably supported by a Certificate of Analysis to demonstrate the absence of pathogens.

SUPPLY OF BAKERY PRODUCTS

INTRODUCTION

This supplement contains specific information regarding the supply of bakery products to Sodexo and must be read in conjunction with the requirements of sections 1 to 10 of this document. Bakery products include whole and sliced bread, rolls and morning goods.

The supplement is based not on minimum legislative requirements but on Industry Guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Hazard Analysis Critical Control Points (HACCP)

Suppliers will need to demonstrate full product traceability, from purchase of raw ingredients, through manufacture and final delivery to Sodexo. This will require detailed records to be kept of batch numbers and codes.

Purchasing

Every effort should be made to ensure, so far as reasonable practicable, that ingredients are free from microbiological and foreign material contamination. Flour, seeds and grains, herbs and spices, and cocoa powder may be sources of pathogenic bacteria, such as Salmonella, E.coli and other pathogens. Nuts may be contaminated with pathogenic organisms, including mycotoxins. Therefore, such ingredients must be purchased from reputable suppliers, preferably supported by a Certificate of Analysis to demonstrate the absence of pathogens.

Production control

Only potable drinking water must be used as a food ingredient and should be monitored by a full chemical and microbiological analysis at least annually.

Extreme care must be taken in the control of allergens, e.g. nuts and their derivatives. Products containing an allergen must be clearly labelled and processing systems should be designed to avoid the risk of cross contamination. Where cross contamination cannot be avoided a warning should be applied to the product label, according to national guidelines and codes of practice.

Good cleaning and sanitation practices are essential to remove allergen residues from equipment and the food production environment.

Reworked ingredients/products may only be used if they are safe and free from contamination. Rework material should be stored in clearly labelled containers fitted with lids.

Foreign material control

Systems must be in place to avoid the risk of foreign material contamination. Removing the packaging from raw materials is a frequent source of contamination, especially paper, stitching string and plastic and therefore extreme care should be taken. The use of stapled boxes is unacceptable.

Plastic wrapping, bags, covers etc should be coloured, preferably blue, to heighten visibility and enable any contamination with such material to be removed.

In consultation with the nominated pest control contractor, effective measures must be implemented to control potential infestations of stored product pests, such as the Flour Moth.

Shelf-life

Provide criteria for establishing shelf stability for ingredients that go into the finished products. Bakery products with lower water activity, such as breads and cereals, are less at risk for shelf life related risks. Bakery products that have high water activity, such as quiches, cheesecakes or products with non-traditional ingredients, such as cheese bread or cream filled products can have problems if they are not handled properly.

Cleaning

Dry process areas/equipment should be dry-cleaned using scrapers and vacuum cleaners. Wet process areas/equipment should be cleaned using appropriate detergent sanitizers, drained and dried thoroughly. If complete drying is difficult then appropriate sanitizers and/or terminal disinfectants should be used. Please also refer to the guidelines in section 9.

SUPPLY OF DAIRY PRODUCTS

INTRODUCTION

This supplement contains specific information regarding the supply of dairy products to Sodexo and must be read in conjunction with the requirements of the sections 1 to 10 of this document.

Dairy products include milk and cream, yoghurt, cheese and eggs. The term 'dairy' used in this document refers to all such foods, unless indicated otherwise.

The supplement is based not on minimum legislative requirements but on industry guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Milk and dairy product establishments must be approved under European Union Regulation (EC) 853/2004. Regulation (EC) 853/2004 lays down specific hygiene requirements for food businesses dealing with foods of animal origin.

Hazard Analysis Critical Control Points (HACCP)

Temperature control of most dairy products is fundamental to food safety and must be maintained throughout the supply chain. Detailed records must be available.

Untreated milk and cream must not, under any circumstances, be supplied to Sodexo. Only Lion branded (UK) or Bord Bia (ROI) whole raw eggs are acceptable to be delivered into Sodexo units. Please refer to Banned and Restricted food product list in appendix 10.

Consumption of unpasteurised soft-cheeses poses a food safety risk to vulnerable people¹; the product must not be delivered in our units without a formal agreement by the Purchasing Team. Please refer to Banned and Restricted food product list in appendix 10.

Foreign material control

Only disposable cloths or wipes may be used for cleaning surfaces, utensils and equipment. Dishcloths, metal scourers and wire wool must not be used.

Systems must be in place to protect the finished product from risk of contamination with metal. In all operations involving mechanical processing the finished product must be screened using sensory metal detection facilities. It will not normally be necessary to have such systems in milk bottling and egg production plants.

Distribution

For short shelf life, perishable products, such as milk, unpasteurised cheeses, cream, and yoghurt, etc, a microbiological sampling programme should be established for testing both raw materials and finished product. Products supplied to Sodexo must not exceed the microbiological standards contained in Appendix 3.

¹ Vulnerable (high-risk) people include pregnant women, under 5's and over 60's and immunocompromised because of a medical condition or treatments.- including people with HIV/AIDS, cancer, diabetes, liver or kidney disease, transplant recipients (FSA, 2010).

Environmental standards

Physically segregated high and low risk areas, including personnel, materials and equipment may be required for some products, such as pasteurised egg, cheese, etc. In small, open plan premises where this may not be possible, partitions must be used to segregate activities. Only fully processed or sanitised food components should be allowed in 'high risk' production areas.

Cleaning

Hoses and pressure washers should be used with care as high water pressure can produce aerosols which spread contamination - pressure to 800 psi is sufficient.

SUPPLY OF FRESH FISH, FISH PRODUCTS & SHELLFISH

INTRODUCTION

This supplement contains specific information regarding the supply of fresh fish, fish products and shellfish to Sodexo and must be read in conjunction with the requirements of sections 1 to 10 of this document.

It is primarily aimed at those suppliers who purchase, process and pack wet fin fish, but in certain sections reference is also made to the supply of live bivalve molluscs and shellfish. The term 'fish' used in this document includes fresh fin fish, fish products and shellfish.

The supplement is based not on minimum legislative requirements but on industry guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Premises that handle or process fishery products and live bivalve molluscs must be approved under European Union Regulation (EC) 883/2004. Regulation (EC) 853/2004 lays down specific hygiene requirements for food businesses dealing with foods of animal origin.

Hazard Analysis Critical Control Points (HACCP)

Temperature control of fish is essential to food safety and must be maintained throughout the supply chain. Detailed records must be available.

Consumption of raw molluscs poses a food safety risk to vulnerable people²; the product must not be delivered in our units without a formal agreement by the Purchasing Team. Please refer to Banned and Restricted food product list in appendix 10.

Suppliers of live bivalve shellfish will need to demonstrate full traceability for every batch. Records relating to the hygiene conditions of the operation should be kept to demonstrate compliance with legal obligations. Including the address of purification centre, duration of purification and dates of entry and leaving the purification centre.

Purchasing

Fish and shellfish are some of the most perishable of foods and therefore it is essential that they are purchased from the most reputable suppliers. Products supplied to Sodexo must not exceed the microbiological standards contained in Appendix 4.

Fish should be purchased on a daily basis to ensure optimum quality and freshness. In most cases this will be from local port markets, but it is recognised that there may also be a need to purchase from remote sources. In either case, the raw material must be purchased in accordance with established product specifications, including those within the current edition of the Sustainable Seafood Purchasing Guide issued by Sodexo. Fish not meeting the raw material specification must not be accepted.

Scallops may only be sourced from and processed in the E.U. Prawns, bivalve molluscs and other shellfish supplied to Sodexo may only be sourced from E.U. grade 'A' or 'B' waters, or if outside the E.U., from E.U. licensed importers. Bivalve molluscs sourced from grade B waters, which are subject to low levels of bacterial contamination, must be purified or heat treated by an E.U. approved process before they can be supplied.

² Vulnerable (high-risk) people include pregnant women, under 5's and over 60's and immunocompromised because of a medical condition or treatments.- including people with HIV/AIDS, cancer, diabetes, liver or kidney disease, transplant recipients (FSA, 2010).

Receipt of goods & storage

After purchase the raw material should be transported to the processing unit as quickly as possible. If necessary, fish may need to be re-iced or re-boxed into clean plastic containers. The means of delivery or collection of the raw material must provide adequate protection for the fish, both in terms of quality and food safety.

The maximum temperature at which fresh fish must be held on delivery and in storage is 2°C. Frozen fish must be delivered at a temperature no greater than -15°C (-18°C ROI) and stored no greater than -18°C.

Frozen fish must be defrosted or tempered in a chilled environment not exceeding 5°C.

Production control

An adequate supply of clean fresh ice must be available at all times for icing products and re-icing stored fish. Plastic or corrosion-resistant metal scoops or shovels should be used for handling ice.

Only potable drinking water should be used for manufacturing ice, washing fish and cleaning surfaces.

Processing operations should be carried out as quickly as possible and should not exceed 30 minutes. It may be necessary to provide temperature controlled rooms in order to maintain product temperatures during processing. In the event of equipment failure, or during break times, products must be returned to chilled storage without delay.

Containers used for storing ice, products or partly processed products must be kept off the floor surface to avoid splashing and risk of contamination.

Whole fish should be washed in clean, flowing water before processing and after scaling or gutting operations. Fish should be allowed to drain after washing so that potentially contaminated water is not carried further into processing. 'Cleaned' fish must be kept completely separate from those which have not washed.

Knives and other cutting equipment must be in good condition and thoroughly sanitised after use. All cutting surfaces and utensils should be rinsed down regularly, especially between different species or in the event of contamination.

Separate workstations should be used for gutting and filleting to avoid cross-contamination. Products must be trimmed to remove fins, bones or discolouration and should be inspected closely for signs of contamination, including parasitic infestation and foreign material.

Offal and other waste material must be kept completely separate from processed fish and must not be allowed to accumulate in production areas.

Distribution

All products must be labelled in accordance with the current labelling regulations. Products that fall under the Fish labelling regulation must meet the requirements laid down in the regulation. This includes the following information: commercial name of the fish species; method of production, eg, whether the fish was caught at sea, in inland waters or farmed; and catch area (if caught) or country of origin (if farmed/cultivated).

Finished products should be packed in enclosed containers with sufficient ice to maintain the product below 2°C during distribution. Frozen products must be packed separately and maintained at -18°C, or colder.

Care must be taken to avoid the risk of contaminating the finished product. Under no circumstances must wet fish be allowed to drain or drip onto other types of fish or fish product. Secondary products, such as smoked fish, must be kept completely separate, as must those species which may taint other fish.

Staff standards

All food handling staff must wear protective clothing, which may be colour coded. Hair must be totally covered by hair nets and/or hats/protective helmets. In most cases Wellington boots or similar will be worn which must be kept clean. In areas where contamination is heavy, such as at gutting workstations, easily washable outer clothing must be provided, including waterproof aprons and/or leggings. Facilities must be available for washing footwear and aprons. Footbaths / boot washers must be kept clean. If chain-mail gloves, aprons etc. are provided, special care must be taken to ensure they are clean, sanitised daily and kept in good repair.

SUPPLY OF FROZEN PRODUCTS

INTRODUCTION

This supplement contains specific information regarding the supply of frozen products to Sodexo and must be read in conjunction with the requirements of the sections 1 to 10 of this document.

The requirements of this document are primarily aimed at manufacturers but also apply to stores, distributors and handlers of frozen foods. Manufacturers are also advised to follow the requirements of the product specific code of this document which is applicable to the frozen products manufactured, eg, meats, fishery or bakery products.

The supplement is based not on minimum legislative requirements but on industry guides and good manufacturing practice. It is our policy to obtain only the best quality products from the most reputable suppliers.

Production control

After processing or cooking, the food should be cooled quickly to below 10°C and thereafter frozen as quickly as reasonably possible. If food cannot be cooled immediately after cooking then it must be maintained at a temperature above 70°C until it can be cooled.

Immediately after cooling, the food should be frozen by a method which ensures that the temperature at the thermal centre passes quickly through the zone of maximum crystallisation. For most products this zone lies between -1°C and -5°C.

Suppliers who make, transport, store or sell quick frozen foodstuffs shall comply with the requirements laid down in the Quick Frozen Foodstuffs Regulation.

SUPPLY OF FRESH FRUIT & VEGETABLES

INTRODUCTION

This supplement contains specific information regarding the supply of fresh fruit and vegetables to Sodexo and must be read in conjunction with the requirements of sections 1 to 10 of this document.

The supplement is based not on minimum legislative requirements but on Industry Guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Purchasing

All products must be purchased from the most reputable suppliers and in accordance with Every effort should be made to ensure, so far as reasonable practicable, that products are free from microbiological, chemical and foreign material contamination. Fresh fruit and vegetables can have a very short shelf life and therefore need to be of the highest quality and be as fresh as possible.

Imports of fruit and vegetables (whether fresh, dried, tinned, processed or frozen) from countries outside the European Union (EU) must meet the same or equivalent food hygiene and compositional standards and procedures as food produced in the UK or other EU Member States.

Receipt of goods & storage

Products must be inspected closely on delivery for any contamination, poor quality or signs of infestation.

Care must also be taken to ensure that products are stored correctly to protect from physical damage and spoilage.

Distribution

Care must be taken to ensure that products are protected during distribution, from both contamination and physical damage.

SUPPLY OF FRESH MEAT

INTRODUCTION

This supplement contains specific information regarding the supply of fresh meat and meat products to Sodexo and must be read in conjunction with the requirements of sections 1 to 10 of this document.

The requirements of this document apply to red meat, poultry and game.

The supplement is based not on minimum legislative requirements but on Industry Guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Approved cutting plants supplying fresh meat to Sodexo are not permitted to supply ready to eat foods regardless of the origin of manufacture.

Meat plants must be approved under European Union Regulation (EC) 853/2004 unless they benefit from specific exemptions. Regulation (EC) 853/2004 lays down specific hygiene requirements for food businesses dealing with foods of animal origin.

Hazard Analysis Critical Control Points (HACCP)

Temperature control of meat is essential to food safety and must be maintained throughout the supply chain. Detailed records must be available.

Purchasing

All products must be purchased in accordance with the specifications contained within the current edition of the Sodexo Meat Buyers Guide.

Whatever the source, meat must be from animals that are slaughtered in accordance with current UK, ROI and/or EU regulations.

Imports of meat and meat products from countries outside the European Union (EU) must meet the same or equivalent food hygiene, compositional standards and procedures and animal health standards as food produced in the UK or other EU Member States.

All beef and beef products supplied to Sodexo must be sourced from heifer and steer meat between 15-24 months old that has been slaughtered at EU approved slaughterhouses. Under no circumstances must meat be supplied from either dairy cattle or that which has been mechanically reclaimed.

Receipt of goods & storage

The maximum temperature at which meat may be held during transport from primary producer to the supplier's premises, in storage and during production is 5°C for red meat (7°C during production), 4°C for poultry and 3°C for offal. The temperature of meat on delivery must be checked and recorded.

Frozen products must be delivered at a temperature no warmer than -15°C (-18°C ROI) and stored no warmer than -18°C. Frozen meat must be defrosted or tempered in a chilled environment not exceeding 5°C.

Separate areas should be provided for 'ageing' beef to avoid the risk of cross-contaminating other products.

Production control

The temperature of rooms in which meat is prepared and/or processed, such as dicing, mincing, cutting, boning, etc, must not exceed 12°C and should be carried out with minimum delay. In the event of equipment failure, products should be returned to chilled storage without delay.

Only potable drinking water should be used for washing and cleaning surfaces.

Separate chilled storage and preparation areas must be provided for poultry. Equipment and utensils used in these areas must be marked accordingly, preferably colour coded.

Secondary use of muslin cloth must be avoided. Cutting blocks must be cleaned and sanitised between operations involving different meat species.

Knives and other cutting equipment must be in good condition and sterilised frequently during and after use, especially between different species and during any breaks. The water temperature of knife sterilisers must be maintained above 82°C.

Labelling

Beef must be labelled in accordance to Regulation (EC) No. 1760/2000, Regulation (EC) No 820/97 and Regulation 1825/2000.

As a minimum the following indications must be shown on all beef labels in accordance to the BLS Guide for Beef Labelling:

1. A reference number or code
2. The name of the **Member State** or **non-EC country** in which the animal or group of animals were born
3. The name of the **Member State** or **non-EC country** in which the animal or group of animals were raised
4. *'Slaughtered in: [name of Member State or non-EC country]'*
5. Licence number of the slaughterhouse
6. *'Cutting/cut in: [name of Member State or non-EC country]'*
7. Licence number(s) of the cutting plant(s)

All minced beef should show the following indications:

1. A reference number or code
2. **Member State** or **non-EC country of slaughter**
3. **Member State** or **non-EC country of mincing**
4. If different from the country of mincing, the country where animals or group of animals have lived from birth to slaughter, **Origin: [name of member State and/or non-EC country] or 'Origin: Non- EC' if the country is outside the EC**

Or if you wish you the label may contain the same indications as a general beef product as listed in 1-7 above.

All meat products that have been previously frozen state 'Previously Frozen – Do Not Re-Freeze' on the label.

Delivery

In the majority of cases fresh meat will be delivered chilled to Sodexo operations. Products may only be supplied in a frozen condition if they have been blast frozen immediately at the end of processing or have been imported/received frozen and maintained at -18°C or colder throughout the supply chain. If a blast freezer is used it should be capable of reducing the product temperature from 3°C to -18°C within 3 hours.

Staff standards

In areas where contamination is heavy, such as boning lines, easily washable outer clothing must be provided, including waterproof aprons and/or leggings. Facilities must be available for washing footwear and aprons. Footbaths/boot washers must be kept clean.

Where chain-mail gloves, aprons, etc, are provided, special care must be taken to ensure they are clean, sanitised daily and kept in good repair.

SUPPLY OF READY TO EAT, COOKED, PREPARED & DELICATESSEN PRODUCTS

INTRODUCTION

This supplement contains specific information regarding the supply of cooked, prepared and delicatessen products to Sodexo and must be read in conjunction with the requirements of the sections 1 to 10 of this document.

Cooked products include those that may be consumed without further heat treatment, such as cooked meats, pasties, pies and similar savoury products. Delicatessen foods include those that are cured, preserved or otherwise treated so as to provide an extended shelf life. Prepared products include those that will normally be heat treated before consumption but should nevertheless be treated as though they were for immediate consumption. The term 'ready to eat' used in the remainder of this document includes all three food categories.

The supplement is based not on minimum legislative requirements but on industry guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Hazard Analysis Critical Control Points (HACCP)

Temperature control of 'high risk' ingredients is fundamental to the safe production of ready to eat products and this must be maintained throughout the supply chain. Detailed records must be available.

Production control

Products must be assembled with the minimum of delay and in temperature controlled rooms not exceeding 10°C. The product temperature must not exceed 8°C during assembly.

In the event of equipment failure, products must be returned to chilled storage without delay. High risk foods exceeding 8°C at any stage of manufacture must not be supplied to Sodexo.

Foreign material control

All finished products must be screened for possible metal contamination using appropriate metal detection facilities. Detector heads must be installed over a moving conveyor, linked to automatic rejection systems and be capable of detecting stainless steel. The sensitivity of the system will depend on numerous factors and therefore the equipment manufacturers must be consulted to ensure the system operates at the highest sensitivity for the products supplied.

Environmental standards

Environmental standards within premises producing cooked products must be of the highest standards and should be designed to allow a linear flow of raw material to finished product, avoiding potential risks of cross-contamination.

Physically segregated high and low risk areas, including personnel, materials and equipment should be provided. In small open plan premises where this may not be possible, partitions must be used to segregate activities. Only fully processed or sanitised food components should be allowed in high risk production areas.

Entry and exit of personnel in high/low risk must be through dedicated changing areas with established hygiene procedures regarding the use of protective clothing and, especially, hand washing.

Adequate ventilation and, if necessary, mechanical air extraction must be provided, especially in cooking areas. Ventilation systems in high risk areas should include air filtration conforming to BS EN 779:2002 specification and should maintain a positive pressure. Please also refer to the guidance in section 8.

Cleaning

Hoses and pressure washers should be used with care as high water pressure can produce aerosols which spread contamination - pressure to 800 psi is sufficient.

Staff standards

If rubber or plastic gloves are used for food production they must be disposable and should be discarded after each session and not used for multi-purpose preparation. The use of gloves does not avoid the need for hand washing.

SUPPLY OF SANDWICHES

INTRODUCTION

This supplement contains specific information regarding the supply of sandwiches and similar bread filled products to Sodexo and must be read in conjunction with the requirements of sections 1 to 10 of this document.

The supplement is based not on minimum legislative requirements but on industry guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Hazard Analysis Critical Control Points (HACCP)

Temperature control of 'high risk' ingredients is fundamental to the safe production of sandwiches and this must be maintained throughout the supply chain. Detailed records must be available.

Receipt of goods & storage

All whole eggs must be purchased pre-cooked from an approved supplier. Under no circumstances must raw eggs be used, either for cooking in-house or, especially, for use in made up products, such as mayonnaise.

Production control

Fruit and vegetables must be prepared in low risk areas before being passed into the main production area(s). Salad ingredients, such as lettuce, tomatoes, cucumber etc must be sanitised in a solution containing an appropriate level of disinfectant, which will reduce the bacterial loading to an acceptable level. Ingredients which carry a heavy bacterial loading, such as watercress must be pre-washed in an appropriate disinfecting solution. All are to have an appropriate dwell time to ensure that the disinfectant has the opportunity to be effective.

Regular checks should be carried out to ensure the required disinfectant concentrations are maintained.

Products must be assembled with the minimum of delay and in temperature controlled rooms not exceeding 10°C. The product temperature must not exceed 8°C during assembly.

In the event of equipment failure, products must be returned to chilled storage without delay. High risk foods which exceed 8°C at any stage of manufacture must not be supplied to Sodexo.

Foreign material control

Systems must be in place to avoid the risk of foreign material contamination. Wood and wooden handled equipment and utensils are not permitted in production areas. Plastic wrapping, bags, covers etc should be coloured, preferably blue, to heighten visibility and enable any contamination with such material to be removed.

Only disposable cloths or wipes must be used for cleaning surfaces, utensils and equipment. Dishcloths, scourers and wire wool must not be used.

All finished products must be screened for possible metal contamination using appropriate metal detection facilities. Detector heads must be installed over a moving conveyor, linked to automatic rejection systems and be capable of detecting stainless steel. The sensitivity of the system will depend on numerous factors and therefore the equipment manufacturers must be consulted to ensure the system operates at the highest sensitivity for the products supplied.

Distribution

A microbiological sampling programme should be established for testing both raw materials and finished product. Every main ingredient of the final product should be tested at least every two months. The microbiological standards contained in Appendix 9 must not be exceeded.

Environmental standards

In addition to the requirements set out in section 8, sandwich production units must have physically segregated high and low risk areas, including personnel, materials and equipment. Only fully processed or sanitised food components should be allowed in high risk production areas.

In high risk areas, ventilation systems should include air filtration should maintain a positive pressure.

Entry and exit of personnel in high/low risk must be through dedicated changing areas with established hygiene procedures, particularly with regard to hand washing and the use of protective clothing.

SUPPLY OF HONEY AND PRODUCTS CONTAINING HONEY

INTRODUCTION

This supplement contains specific information regarding the supply of honey and products containing honey to Sodexo and must be read in conjunction with the requirements of sections 1 to 10 of this document.

The supplement is based not on minimum legislative requirements but on industry guides and good manufacturing practice. It is Sodexo's policy to obtain only the best quality products from the most reputable suppliers.

Hazard Analysis Critical Control Point

Honey is a carrier for *C.botulinum*. If used industrially, large vats of honey can become anaerobic and allow *C.botulinum* to grow. Therefore specific controls must be put in place for controlling the growth of *C.botulinum* and this must be documented in your HACCP.

Production control

The following products require a positive release scheme to be in place prior to being released into Sodexo's supply chain:

- Honey where it's packaging creates an anaerobic environment, e.g. jars
- Any finished product containing honey where its packaging creates an anaerobic environment e.g. MAP packaging

GENERAL POLICIES

Food related allergies

Food allergies are becoming more common and many foods and ingredients are capable of causing reactions to certain vulnerable individuals. In extreme cases an anaphylactic reaction can occur which can prove fatal.

Sodexo recognises our responsibilities as a caterer with regards to managing allergens and the importance of providing our customers and clients with relevant information so that allergy sufferers can make appropriate choices.

Sodexo believes that our suppliers perform an important role in this communication process. Therefore all our suppliers are required to have a documented allergen management system in place to ensure the products that are supplied are not contaminated with allergens or where necessary are appropriately labelled.

Therefore all suppliers must provide detailed ingredient labelling on the packaging and product specifications this must identify any common allergens contained within the product. Catering staff are then in a position to inform customers on menus and provide relevant information on request.

Ethically produced food

Sodexo's Purchasing Department works closely with Safeguard in ensuring that we purchase safe food from approved sources of supply.

Where clients require food that is ethically produced the Purchasing Department will nominate suitable suppliers. These suppliers will be expected to provide ethically produced food including organic fruit and vegetables, free range eggs, red and white meat, fish and shellfish, from verifiable sources. Fair Trade products, eg, tea and coffee can also be obtained from suppliers who meet requirements on employment health and safety.

All Sodexo nominated suppliers are regularly audited by Safeguard and traceability as well as origin of raw materials is a key part of the audit.

Fair Trade policy

Sodexo is committed to well established food safety, health and safety and environmental policies and considers its supply chain as integral to the implementation of these policies.

Consequently we communicate with our suppliers on the content of these policies as part of our commitment to working in partnership with them.

Sodexo suppliers are regularly audited to ensure compliance with our standards and as part of this audit a review of how the supply chain is managed.

Imported products are also included in this process. To ensure that our clients are given the widest available choice we include within our supplier base, suppliers who have committed to Fair Trade Products by signing up to the Fair Trade Mark.

It is our objective to provide a supplier base that is suitable for our wide range of clients without compromising the high standards of food safety that we demand.

Genetically Modified Food (GMOs)

Food retailers and caterers are required to inform their customers which foods and ingredients, if any, contain or are produced from genetically modified food. The requirements are laid down in the (EC) 1829/2003 and (EC) 1830/2003 regulations.

Enforcement of these regulations are implemented in the UK by the way of Genetically Modified Food; GM Animal Feed and GMO (Traceability and Labelling) (England) Regulations 2004 (similar Regulations have been implemented in Northern Ireland, Scotland and Wales). GM food is still subject to the Food Labelling Regulations 1996 (as amended).

GMO is defined as *"food organisms that have been genetically engineered, foodstuffs that contain an ingredient of a genetically engineered organism or foodstuffs that have been produced using a processing aid made with the use of genetic engineering"*.

It is Sodexo's policy not to use genetically modified food as part of any meal supplied to our clients or customers. In order to comply with this policy and in particular where clients demand assurance that foods consumed are free of genetically modified ingredients, it is essential that suppliers conform to the following requirements;

- a. Provide to Sodexo information in writing as to whether foods they supply contain genetically modified ingredients. This must include an assessment of any upstream suppliers.
- b. Ensure by regular sampling and testing that foods which they supply is free from genetically modified ingredients comply with that specification.
- c. All products, which contain modified ingredients, must be labelled with appropriate information as if they were to be sold by retail. Such labelling shall be on the packaging of all 'saleable units'.

If GM foods are accidentally or unavoidably present in a food at low levels (no more than 0.9%), they need not be declared. In this case, the producer will be expected to show that they have taken appropriate steps to avoid the presence of GM food.

It is insufficient for a supplier to state that they do not knowingly use genetically modified food, as this will not enable Sodexo to demonstrate 'due diligence' in complying with the labelling regulations.

MICROBIOLOGICAL SPECIFICATION FOR MEAT & MEAT PRODUCTS

The following specifications are issued for the guidance of suppliers to Sodexo and relate to both frozen and chilled products. Sodexo expects that product supplied to them at the start of its shelf-life will reflect the standards of Good Manufacturing Practice (GMP) so that at the end of its stated shelf-life it will not exceed the maximum figure quoted in the third column in the tables below.

Aerobic Plate Counts (APC) are generally higher in minced meats / reformed products than on whole cuts but should still meet the GMP criteria.

RAW POULTRY		
Product Examples		
Whole birds, portions, minced / reformed poultry meat, marinated products		
Microbiological Criteria		
Organism	GMP	Maximum
APC	<10 ⁵ /g	10 ⁷ /g
<i>Pseudomonas</i> spp.	<10 ⁵ /g	10 ⁷ /g
Yeast (marinated products)	<10 ⁴ /g	10 ⁶ /g
Salmonella	ND in 25g**	ND in 25g**

RAW MEAT		
Product Examples		
Joints, mince, diced meats, offal, burgers, sausages, bacon, marinated products, cured products.		
Microbiological Criteria		
Organism	GMP	Maximum
APC	<10 ⁵ /g	10 ⁷ /g
<i>E. coli</i>	<10 ² /g	10 ⁴ /g
Yeasts (sausages & marinated products)	<10 ⁴ /g	10 ⁶ /g
Salmonella	ND in 25g**	ND in 25g**

** EU Regulations

MINCED MEAT *			
Microbiological Criteria			
Organism	GMP	Maximum	
APC	<5 x 10 ⁵ /g	5 x 10 ⁶ /g	At end of manufacturing
<i>E. coli</i>	<50/g	500/g	At end of manufacturing

MEAT PREPARATIONS *			
Microbiological Criteria			
Organism	GMP	Maximum	
<i>E. coli</i>	<500/g	5000/g	At end of manufacturing

MICROBIOLOGICAL SPECIFICATIONS FOR FISH, FISH PRODUCTS AND SHELLFISH

The following specifications are issued for the guidance of suppliers to Sodexo and relate to both frozen and chilled products. Sodexo expects that product supplied to them at the start of its shelf-life will reflect the standards of Good Manufacturing Practice (GMP) so that at the end of its stated shelf-life it will not exceed the maximum figure quoted in the third column in the tables below.

RAW FISH AND SHELLFISH		
Product Examples		
Whole, fillets, mussels, shellfish to be cooked		
Microbiological Criteria – Items to be cooked		
Organism/Toxin	GMP	Maximum
APC	<10 ⁶ /g	10 ⁷ /g
<i>E. coli</i>	<10/g	10 ³ /g
<i>E. coli</i> for live bivalve shellfish	<230/100g	<230/100g
<i>Salmonella spp.</i>	ND in 25g	ND in 25g
Yeasts (pickled/marinated)	<10 ⁴ /g	10 ⁶ /g
Histamine (scombroid fish)	<50ppm (<5mg/100g)	50ppm (5mg/100g)
PSP (bivalve mollusc flesh)	ND in 25g	<80µg/100g
DSP (bivalve mollusc flesh)	ND in bioassay	ND in bioassay

LIVE BIVALVE SHELLFISH		
Product Examples		
Oysters, clams, scallops		
Microbiological Criteria – Items to be eaten raw		
Organism/Toxin	GMP	Maximum
APC	<10 ⁶ /g	10 ⁷ /g
<i>E. coli</i> (bivalve mollusc flesh)	<230/100g	<230/100g
<i>Salmonella spp.</i> (bivalve mollusc flesh)	ND in 25g	ND in 25g
PSP (bivalve mollusc flesh)	ND in 25g	<80µg/100g
ASP (bivalve mollusc flesh)	<20mg/kg	<20mg/kg
DSP (okadaic acid, dinophysistoxins and pectenotoxins together)	ND in bioassay	<16µg/100g
DSP (yessotoxins)	ND in bioassay	<1mg/kg
DSP (azaspiracids)	ND in bioassay	<160mg/kg

READY TO EAT FISH & SHELLFISH

Product Examples

Smoked salmon, crustaceans, roll mop, herring, cold smoked, marinated or pickled (acidified) products, gravadlax, prawns

Microbiological Criteria

Organism/Toxin	GMP	Maximum
APC (salted or pickled fish)	NA	NA
APC (Smoked fish, gravadlax, Sushi)	<10 ⁶ /g	<10 ⁷ /g
APC (cooked chilled items, eg, hot smoked fish, shellfish out of shell, molluscs, crustaceans)	<10 ⁵ /g	<10 ⁷ /g
Yeasts (pickled/marinated)	<10 ⁴ /g	10 ⁶ /g
<i>E. coli</i>	<20/g	<100/g
Enterobacteriaceae	<100/g	10 ⁴ /g
<i>Salmonella</i> spp.	ND in 25g	ND in 25g
<i>V. parahaemolyticus</i> (warm water fish)	<20/g	<1000/g
<i>L. monocytogenes</i>	<10/g *	<100/g
<i>S. aureus</i>	<20/g	10³/g
Histamine (scombroid fish) See note below	<50ppm (<5mg/100g)	50ppm (5mg/100g)
PSP (bivalve mollusc flesh)	ND in 25g	<80µg/100g
DSP (bivalve mollusc flesh)	ND in bioassay	ND in bioassay

APC = Aerobic Plate Count

DSP = Diarrhetic Shellfish Poisoning

PSP = Paralytic Shellfish Poisoning

ND = Not Detected

* = Not detected in 25 g for certain long shelf-life products under refrigeration

EU Regulations specify histamine levels for fish species and products associated with high histidine content:

GMP <100mg/kg and Maximum <200mg/kg

For the same fish undergone enzyme maturation treatment in brine: GMP <200mg/kg and Maximum <400mg/kg

MICROBIOLOGICAL SPECIFICATION FOR BAKERY PRODUCTS

The following specifications are issued for the guidance of suppliers to Sodexo and relate to both frozen and chilled products. Sodexo expects that product supplied to them at the start of its shelf-life will reflect the standards of Good Manufacturing Practice (GMP) so that at the end of its stated shelf-life it will not exceed the maximum figure quoted in the third column in the tables below.

BAKERY READY-TO-EAT		
Product Examples, Ambient		
Bread and bakery products, confectionery products without diary cream		
Microbiological Criteria		
Organism	GMP	Maximum
<i>Salmonella</i> spp.	ND in 25g	ND in 25g
APC	<10 ⁴ /g	10 ⁶ /g
Enterobacteriaceae	<10 ² /g	10 ⁴ /g
Moulds	<10 ² /g	10 ⁴ /g
<i>S. aureus</i>	<20/g	10 ² /g

BAKERY TO BE COOKED		
Product Examples, Frozen or Chilled		
Bread dough, pastry, part-baked products, pasta		
Microbiological Criteria		
Organism	GMP	Maximum
<i>Salmonella</i> spp.	ND in 25g	ND in 25g
<i>S. aureus</i>	<20/g	10 ³ /g
<i>B. cereus</i>	<10 ² /g	10 ⁴ /g
<i>E. coli</i>	<10 ² /g	10 ³ /g
Lactic acid bacteria	<10 ⁵ /g	10 ⁷ /g

APC = Aerobic Plate Count

ND = Not Detected

MICROBIOLOGICAL SPECIFICATION FOR COOKED, PREPARED & DELICATESSEN PRODUCTS

The following specifications are issued for the guidance of suppliers to Sodexo and relate to both frozen and chilled products. Sodexo expects that product supplied to them at the start of its shelf-life will reflect the standards of Good Manufacturing Practice (GMP) so that at the end of its stated shelf-life it will not exceed the maximum figure quoted in the third column in the tables below.

COOKED, PREPARED & DELICATESSEN		
Product Examples, Frozen or Chilled		
Ready meals, cooked meats and fish products, pies, pasties, quiches, flans, fermented meats, cured meats, desserts		
Microbiological Criteria		
Organism	GMP	Maximum
<i>Salmonella</i> spp.	ND in 25g	ND in 25g
<i>L. monocytogenes</i>	<10/g **	<100/g
<i>C. perfringens</i> (cooked meat, vegetables, pulses)	<10/g	<10 ³ /g
<i>B. cereus</i>	<10 ³ /g	<10 ³ /g
<i>S. aureus</i>	<20 /g	<10 ² /g
<i>Campylobacter</i> spp.	ND in 25g	ND in 25g
VTEC (raw fermented meats)	ND in 25g	ND in 25g
<i>E. coli</i>	<20/g	<100/g
Enterobacteriaceae	<10 ² /g	10 ⁴ /g
APC (heat treated)	<10 ⁴ /g	10 ⁷ /g

** = Not detected in 25 g for certain long shelf-life products under refrigeration

MICROBIOLOGICAL SPECIFICATION FOR SANDWICH PRODUCTS

The following specifications are issued for the guidance of suppliers to Sodexo and relate to both frozen and chilled products. Sodexo expects that product supplied to them at the start of its shelf-life will reflect the standards of Good Manufacturing Practice (GMP) so that at the end of its stated shelf-life it will not exceed the maximum figure quoted in the third column in the tables below.

SANDWICHES		
Product Examples, Chilled		
Sandwiches and rolls with salad, sandwiches and rolls without salad		
Microbiological Criteria		
Organism	GMP	Maximum
<i>Salmonella</i> spp.	ND/25g	ND/25g
<i>L. monocytogenes</i>	ND/25g	ND/25g
<i>S. aureus</i>	<20/g	<10 ² /g
Enterobacteriaceae	<10 ² /g	<10 ³ /g
<i>E. coli</i>	<20/g	<10 ² /g
APC (without salad or cheese)	<10 ⁴ /g	<5x10 ⁴ /g
APC (with salad)	<10 ⁵ /g	<5x10 ⁵ /g
APC (with cheese)	NA	NA

APC = Aerobic Plate Count

ND = Not Detected

MICROBIOLOGICAL SPECIFICATION FOR DAIRY PRODUCTS

The following specifications are issued for the guidance of suppliers to Sodexo and relate to both frozen and chilled products. Sodexo expects that product supplied to them at the start of its shelf-life will reflect the standards of Good Manufacturing Practice (GMP) so that at the end of its stated shelf-life it will not exceed the maximum figure quoted in the forth column in the tables below.

DAIRY PRODUCTS			
Product Examples, Chilled or Frozen			
Liquid milk, cream, pasteurised and unpasteurised cheeses, ice cream, butter, yoghurts and other fermented dairy products			
Microbiological Criteria			
Product	Organism	GMP	Maximum
All	<i>Salmonella</i> spp	ND in 25ml/g	ND in 25ml/g
	<i>L. monocytogenes</i>	ND in 25ml/g	ND in 25ml/g
	<i>S. aureus</i>	<20 /ml /g	<10 ³ /ml /g
	VTEC (raw milk based products)	ND in 25ml/g	ND in 25ml/g
	<i>E. coli</i>	<20 /g	10 ² /g
	Enterobacteriaceae	<10 ² /g	10 ⁴ /g
Non fermented dairy products	APC	10 ⁵ /g	10 ⁷ /g
Fermented dairy products, ripened cheeses	APC	NA	NA

UHT MILK & DAIRY PRODUCTS
Product Examples, Ambient
Long life milks including flavoured products, milk shakes, sterilised milk
Microbiological Criteria- commercially sterile or equivalent

EGGS & EGG PRODUCTS		
Product Examples, Chilled or Frozen		
Liquid, frozen and dried eggs		
Microbiological Criteria		
Organism	GMP	Maximum
APC	5 x 10 ⁴ /ml /g	10 ⁵ /ml /g
Enterobacteriaceae	10 /ml /g	10 ² /ml /g
Staphylococci	<20 /ml /g	<10 ³ /g /ml
<i>Salmonella</i> spp.	ND /25g/ml	ND /25g/ml
<i>L. monocytogenes</i>	ND in 25ml/g	ND in 25ml/g

APC = Aerobic Plate Count

ND = Not Detected

MICROBIOLOGICAL SPECIFICATION FOR FRUIT AND VEGETABLES

The following specifications are issued for the guidance of suppliers to Sodexo and relate to both frozen and chilled products. Sodexo expects that product supplied to them at the start of its shelf-life will reflect the standards of Good Manufacturing Practice (GMP) so that at the end of its stated shelf-life it will not exceed the maximum figure quoted in the forth column in the tables below.

FRUIT & VEGETABLES			
Product Examples			
Prepared Salads, Stir-fry vegetables, blanched vegetables, fresh herbs, bean sprouts, raw fruit and raw vegetables.			
Microbiological Criteria			
Products	Organism	GMP	Maximum
Raw vegetables to be washed or cooked	Bacterial pathogens, APC, Enterobacteriaceae	Criteria for absence not generally applicable	
Prepared, Ready-to-eat	<i>Salmonella</i> spp.	ND in 25g	ND in 25g
	<i>L. monocytogenes</i>	<10 /g	<100 /g
	<i>B. cereus</i>	<10 ³ /g	<10 ⁴ /g
	<i>C. perfringens</i>	<10 /g	<10 ³ /g
	<i>S. aureus</i>	<20 /g	<10 ³ /g
	<i>E. coli</i>	<20 /g	<100 /g
	Enterobacteriaceae	<100 /g	<10 ⁴ /g
	APC (prepared salads)	<10 ⁶ /g	<10 ⁷ /g

APC = Aerobic Plate Count

ND = Not Detected

SODEXO UK & IRELAND BANNED AND RESTRICTED FOOD PRODUCTS LIST

The following food items are prohibited from being served at sites where Sodexo is responsible for the catering, either as a whole product or as part of a combined product or dish.

BANNED FOOD PRODUCTS			
	Category	Risk	Purchasing Information
All	Genetically modified organisms products (GMO)	Non-conformance with Sodexo's Supplier Code of Practice	For further information please contact Supply Solutions on 0870 066 4045 or email supply@sodexo.com
Dairy	Non Lion branded whole raw eggs (UK) Non Bord Bia whole raw eggs (ROI)	Possible presence of pathogen: <i>Salmonella</i>	
	Unpasteurised milk and cream	Possible presence of pathogen: <i>Listeria, Salmonella, E.coli, Campylobacter and Staphylococcus aureus</i>	
Fresh	Plants potted in soil, ie, potted herbs	Introduction of possible pathogens into a kitchen environment: <i>Listeria, Salmonella, E.coli</i>	
Grocery	'Homemade' Infused oils using vegetables/herbs and spices, eg, garlic, chilli, rosemary (Note: this advice does not affect manufactured oils available from nominated suppliers or homemade salad dressing for use on the day of production)	Possible presence of pathogen: <i>Clostridium Botulinum</i>	
Fresh	Raw beansprouts	Possible presence of pathogen: <i>Listeria, Salmonella, E.coli,</i>	

Fish	<p>Species that are specified as “Forbidden” in Sodexo’s Sustainable seafood European Purchasing guide:</p> <ul style="list-style-type: none"> ■ Black scabbard fish (<i>Aphanopus carbo</i>) ■ Nile perch (<i>Lates niloticus</i>) ■ Eel (<i>Anguilla anguilla</i>, <i>Anguilla japonica</i>, <i>Anguilla rostrata</i>) ■ Ling (<i>Molva molva</i>) ■ Orange roughy (<i>Hoplostethus atlanticus</i>) ■ Skate / Ray(<i>Raja</i> spp) ■ Grenadier (<i>Coryphaenoides rupestri</i>,/ <i>Macrourus berglax</i>) ■ Blue ling (<i>Molva dypteryg</i>) ■ Seabream (<i>Pagellus centradontus</i> or bogaraveo) ■ Tonguesole (<i>Cynoglossus senegalensis</i>) ■ Halibut, atlantic (<i>Hippoglossus hippoglossus</i>) ■ Marlin (<i>Makaira</i> spp) ■ Shark (Various) ■ Tuna, bluefin(<i>Thunnus thynnus</i>) ■ Atlantic Salmon, wild caught (<i>Salmo salar</i>) ■ Tusk (<i>Brosme brosme</i>) ■ Atlantic Wolffish (<i>Anarhichas lupus</i>) 	<p>Non-conformance with Sodexo’s Sustainable Seafood policy, which aims to increase the amount of fish and seafood sourced from sustainable sources (wild or aquaculture).</p> <p>The Sustainable seafood Purchasing guide provides further guidance on the supply of fresh, frozen or canned seafood.</p> <p>Sodexo no longer serves any seafood species which are identified in conjunction with the WWF³ as being “at risk” due to over exploitation.</p>	
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³ **WWF** is the world’s leading environmental organisation protecting endangered wildlife and environments, tackles climate change and promotes sustainable use of resources.

The following products must not be served to vulnerable¹ people either as a whole product or as part of a combined product or dish at sites where Sodexo is responsible for the catering.

RESTRICTED FOOD PRODUCTS							
	Category	Examples	Restriction	Risk	FSA Warning	Label Message	Safeguard Information
Dairy	Unpasteurised soft cheeses	Gruyere Camembert Lancashire Brie Buffalo - Mozzarella Maisies - Kebbuck Comte Waterloo – baby Others...	These products are prohibited from being used in units catering for children, or vulnerable people ⁴ .	Possible presence of pathogen: <i>Listeria</i> , <i>Salmonella</i> , <i>E.coli</i> , <i>Campylobacter</i> and <i>Staphylococcus aureus</i>	The Food Standards Agency strongly advises that these products should not be consumed by children, pregnant women, older people or those who are unwell or have chronic illness	Unpasteurised cheeses must be clearly described in the menu or on display, eg, goats cheese salad (contains unpasteurised cheese)	For further information and guidance please contact Safeguard on 0161 872 4781 or email safeguard@sodexo.com
Fish	Raw molluscs	Oyster Clams Scallops Mussels Whelks Others...	These products are prohibited from being used in units catering for children, or vulnerable persons ¹ .	Possible presence of pathogen: Norovirus, <i>Vibrio</i> , <i>Listeria</i> , <i>Cryptosporidium</i> , <i>E.coli</i>	The Food Standards Agency strongly advises that raw molluscs should not be consumed by children, pregnant women, older people or those who are unwell or have chronic illness. However it should be fine for these groups of people to eat all shellfish, including molluscs, that have been thoroughly cooked, because this usually kills any bacteria or viruses in them.	Raw molluscs must be clearly described in the menu or on display, eg, seafood salad, (contains "raw type of mollusc").	For further information and guidance please contact Safeguard on 0161 872 4781 or email safeguard@sodexo.com

⁴ Vulnerable (high-risk) people include pregnant women, under 5's and over 60's and immunocompromised because of a medical condition or treatments - including people with HIV/AIDS, cancer, diabetes, liver or kidney disease, transplant recipients (FSA, 2010).

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