INDEPENDENT INSPECTION STANDARD

Elevated GMP/GWP

Food Safety, Product Safety and Quality Systems

Food Manufacturing | Packaging Materials | Storage and Distribution

ISO/IEC 17020 Accreditation-Alignment Edition

Designed for use within a competent, impartial and consistently operated inspection-body management system.

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Document Control

Control	Current information
Standard owner	Turpin Auditing and Consulting
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Supersedes	TAC Elevated GMP/GWP Supplier Assurance Standard, Issue 1
Related controlled documents	Scheme Operations Manual; quality management system; competence program; approved report forms; accreditation claims procedure
Review cycle	At least annually and whenever material regulatory, scientific, accreditation or industry changes occur
Controlled status	The current controlled copy is maintained by Turpin Auditing and Consulting

Accreditation status and limitation

This Standard is designed for operation within an inspection-body management system aligned to ISO/IEC 17020:2026. The Standard alone does not establish, grant or guarantee accreditation. An inspection may be represented as accredited only after the inspection body has received formal accreditation and only when the activity, location, personnel, method and report fall within the granted scope.

Accreditation boundary: The site requirements in this Standard define what is inspected. ISO/IEC 17020 and the controlled inspection-body procedures define how TAC demonstrates competence, impartiality and consistent operation.

Independent status

This is an independent supplier assurance inspection standard. It is not owned, endorsed or administered by, GFSI, FDA, CFIA or another regulatory or certification body. An inspection against this Standard is not GFSI certification and does not replace a regulatory inspection, customer requirement or certification to an applicable certification program.

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Disclaimer

This Standard provides supplier assurance criteria based on recognized good manufacturing, warehousing, distribution and product-safety practices. It is not legal advice. Each site remains responsible for compliance with applicable laws, permits, product requirements and customer specifications. Conclusions are based on the conditions, records, activities and evidence available during the inspection period and on the sampling described in the report.

Contents

Purpose and Use

The T.A.C Independent Inspection Standard establishes an elevated GMP/GWP framework for organizations that manufacture food, manufacture or convert packaging materials, or store and distribute food and associated materials. It sits above a basic facility inspection by requiring documented systems, effective implementation, objective evidence, verification and continual improvement.

Bridge principle: A conforming site must do more than maintain acceptable physical conditions. It must demonstrate that controls are defined, implemented, monitored, corrected when they fail and periodically verified for effectiveness.

Terminology and normative language

For this Standard, inspection is the conformity-assessment service and audit is the systematic method used to obtain and evaluate evidence. The terms auditor and inspector may therefore refer to the same authorized person. “Shall” identifies a requirement, “should” identifies a recommendation, and “may” identifies permission. Requirements marked [F] are fundamental.

Inspection applications and eligibility

Application	Accreditation eligibility
Supplier approval	Potentially eligible when within the granted scope and after contract, competence and impartiality review.
Surveillance	Potentially eligible when performed as a defined inspection activity within the granted scope.
Focused inspection or re-inspection	Potentially eligible when scope, method and reporting remain within the granted scope.
Gap assessment	Not represented as an accredited inspection result.
Self-assessment	Internal use only; not an independent accredited inspection.
Consulting or implementation support	Not an inspection and not represented as accredited.

Inspection scope selection

Sections 1-8 form the common core and apply to every inspection. At least one sector module shall be selected: 9A Food Manufacturing, 9B Packaging Materials, or 9C Storage and Distribution. More than one module may apply at mixed-activity sites. The contract and inspection plan shall identify products or materials, processes, storage conditions, buildings, shifts, outsourced activities, boundaries and justified exclusions.

Contract review and inspection eligibility

Before accepting work, the inspection body shall confirm that the requested scope is defined, the method is suitable, competent and authorized personnel are available, applicable legal and customer criteria are identified, sufficient time can be assigned, and any impartiality threat can be eliminated or acceptably controlled. Work shall not be represented as accredited when these conditions are not met.

Impartiality and conflicts of interest

T.A.C shall complete and document an impartiality review before assignment. An inspector or technical reviewer shall not participate where employment, financial interest, recent consulting, design, implementation, advocacy, close personal relationship or another connection creates an unacceptable threat to objective judgment. Specific safeguards, assignment restrictions and review intervals shall be defined in the Scheme Operations Manual.

Requirement status

Marking	Meaning
[F]	Fundamental requirement. A major failure prevents final approval until corrective action is accepted; a critical failure causes an automatic Not Approved result.
No marking	Core or supporting requirement assessed according to risk, implementation and objective evidence.
Not applicable	Permitted only when outside the defined scope and an objective justification is recorded and accepted during technical review.

Evidence period

The inspector shall normally review evidence from the previous 12 months or since the prior inspection, whichever is shorter. Initial inspections should ordinarily include at least three months of implementation records. If an activity did not occur, the inspector shall evaluate whether a suitable documented and tested system is available.

Inspection Protocol and Rating

The inspection combines physical examination, employee interviews, observation of practices, review of documented programs and records, and trace-back or challenge exercises. Conclusions are based on objective evidence and risk to product safety, legality, quality, integrity and continued system effectiveness.

Inspection planning and duration

A documented, risk-based method shall determine inspection duration and sampling. Factors shall include site size and complexity; products, processes and modules; number of buildings and shifts; open-product and high-risk activities; outsourced operations; regulatory and customer risk; prior performance; and whether all relevant activities are operating. Additions, reductions and changes to planned time shall be justified and recorded. The standard audit will be 8 hours and adjusted as needed based on the direction of the auditor at the time of the audit.

Inspection plan and conduct

The inspection plan shall cover the agreed scope, opening and closing meetings, facility and process examination, interviews, records, traceability or challenge activity, and applicable shifts and modules. The inspector shall follow evidence to areas of greatest risk and may expand sampling where conditions indicate loss of control.

Sampling and limitations

Inspection is sample-based and does not prove continuous conformity. The report shall identify representative samples and material limitations. If unavailable activities, records, personnel or areas prevent a supportable conclusion, the inspection shall be recorded as incomplete or no final Statement of Inspection Result shall be issued.

Finding classifications

Classification	Definition
Conforming	The requirement is effectively documented and implemented, with adequate evidence of continued control.
Observation	An advisory improvement opportunity that is not a nonconformity and does not affect the score.
Minor	An isolated or limited lapse that does not create significant doubt about product conformity or system effectiveness.
Major	A substantial failure, repeated lapse or missing system element that creates significant doubt about product conformity or effective control.
Critical	A failure involving actual or imminent unsafe, illegal or materially misrepresented product; loss of a critical safety control; deliberate falsification; or another condition requiring immediate action.
Not applicable	The requirement is demonstrably outside the documented inspection scope.

Repeated and systemic findings

A repeated minor against the same requirement or control from the prior inspection shall normally be classified as major unless a documented technical justification supports another classification. Multiple related minor failures may be combined as a major when they demonstrate a systemic breakdown. The report shall retain the objective evidence and classification rationale.

Clause scoring

Result	Points
Conforming	4
Observation	4; no deduction
Minor	3
Major	1
Critical	0 and automatic Not Approved
Not applicable	Excluded from available points

Each domain percentage equals points earned divided by available points for applicable clauses. The domain percentage is multiplied by the domain weight, and the final score is the sum of weighted domain scores. When two or more modules apply, the 15 percent module weight shall be divided in the inspection plan according to the significance of the activities.

Domain weights

Domain	Weight
1 Leadership, responsibility and culture	8%
2 Hazard, risk, legal and security management	12%
3 Product safety and quality management system	12%
4 Supplier, service-provider and material control	8%
5 Site, utilities, equipment and maintenance	12%
6 Personnel, training and GMP practices	8%
7 Sanitation, chemical, pest and environmental controls	12%
8 Receiving, storage, traceability, dispatch and transport	13%
Applicable sector module(s)	15%
Total	100%

Inspection ratings

Rating	Score	Additional conditions
Superior	94-100%	No critical findings and no open major findings.
Good	86-93%	No critical findings and no more than one major finding.
Satisfactory	77-85%	No critical findings and no more than three major findings; approval remains conditional until major findings are closed.
Not Approved	Below 77%	Also applies to any critical finding, more than three major findings, or failure to close a major fundamental finding.

Decision rule and customer approval

The score and rating shall be assigned only by the published rules in this Standard. The rating is the inspection conclusion; it does not compel a customer to approve a supplier. Customer approval, listing and purchasing decisions remain separate and may include requirements outside this Standard.

Corrective action and closure

For every nonconformity, the site shall provide correction, root cause where appropriate, corrective action, assigned responsibility, completion date and objective evidence. Unless the customer program sets a shorter period, evidence shall be submitted within 30 calendar days. Critical findings require immediate containment and customer notification and normally require a full or focused re-inspection.

Independent technical review and authorization

Before final issue, a competent person who was not a member of the inspection team shall review the scope, evidence, findings, not-applicable decisions, score, rating, corrective-action status, accreditation eligibility and report completeness. The reviewer shall have authority to require clarification or correction. A final report or Statement of Inspection Result shall not be issued until this review is completed and the result is authorized.

Statement of Inspection Result

After applicable closure and technical-review requirements are met, TAC may issue a Statement of Inspection Result identifying the site, scope, exclusions, inspection dates, announced or unannounced status, rating and finding totals. The statement reflects the conditions and evidence assessed on the stated date or dates. It is not a certificate of regulatory compliance, product certification or BRCGS/GFSI certification. A customer program may expect reassessment within 12 months, but the statement does not represent continuing conformity or carry a 12-month certification validity period.

Reports and accreditation claims

Every final report shall clearly identify whether the inspection was performed within an accredited scope. Accreditation symbols and claims shall be used only after formal grant, in accordance with the accreditation body's rules and TAC's controlled claims procedure. Accredited and non-accredited activities shall not be presented in a manner that could mislead the reader.

Appeals and complaints

A site may appeal a finding or rating in writing within five business days of report issuance. The appeal shall identify the disputed requirement and provide objective evidence. Appeals and complaints shall be handled through documented processes by persons independent of the matter under review, with decisions and reasons recorded. Submitting an appeal or complaint shall not result in discriminatory action.

1 Leadership, Responsibility and Product-Safety Culture

Senior management shall establish clear direction, accountability and resources so that product safety, legality, quality and integrity are consistently protected.

1.1 [F] Policy and product-safety culture. Senior management shall establish, sign and maintain a policy committing the site to provide safe, legal, authentic and quality-conforming products or services and to meet applicable customer requirements. The policy shall be communicated to all personnel.

1.2 Objectives, resources and management review. Measurable objectives shall be established for relevant functions. Performance shall be reviewed at least quarterly and shall include trends such as audit results, complaints, incidents, corrective actions, training, hygiene performance and supplier performance. Senior management shall provide adequate competent personnel, time, facilities, equipment, training and financial resources to implement and improve the requirements of this Standard. Senior management shall conduct a documented management review at least annually. The review shall evaluate objectives, prior actions, internal and external audits, complaints, incidents and recalls, hazard or risk plans, supplier performance, food defense and fraud controls, corrective-action effectiveness, culture activities, resources and opportunities for improvement.

1.3 Organization and accountability. An organization structure shall identify responsibilities, reporting relationships and authority for personnel whose work affects product safety, legality, quality or integrity. Deputies shall be identified for key roles.

1.4 Operational escalation and reporting concerns. The site shall maintain a meeting or escalation process that enables product-safety, legality, quality and integrity concerns to reach responsible management promptly. Decisions and actions shall be recorded and tracked. Personnel shall be provided a method to report product-safety, legality, quality or integrity concerns without retaliation. Reports shall be evaluated and addressed by authorized management.

1.5 Legal and customer requirements. The site shall identify applicable legal, regulatory, permit, registration, customer and code-of-practice requirements and maintain a method for receiving, evaluating and implementing relevant changes.

1.6 Change management. Planned changes to products, materials, suppliers, processes, equipment, utilities, software, facilities or services shall be risk assessed, approved and communicated before implementation. Validation, training, document updates and post-implementation review shall be completed as applicable.

1.7 Regulatory inspection readiness. A documented process shall define authorized contacts, accompaniment, record and sample handling, photography or recording practices where legally permitted, escalation and follow-up for regulatory inspections or official visits.

2 Hazard, Risk, Legal and Security Management

The site shall use a documented, risk-based system to identify significant hazards and threats and establish controls appropriate to its products, materials, processes, storage and distribution activities.

2.1 [F] Hazard and risk assessment. A documented hazard and risk assessment appropriate to the site and sector shall be developed, implemented and maintained. Food manufacturing shall use HACCP or a legally applicable preventive-control approach; packaging operations shall use a product-safety hazard and risk analysis; storage and distribution operations shall assess hazards associated with products, conditions and services.

2.2 Competent team and process description. The assessment shall be developed and maintained by a multidisciplinary team with appropriate knowledge of products, processes, equipment, microbiology or chemistry as relevant, allergens, intended use and applicable legal requirements. A trained team leader and deputy shall be identified. The assessment shall define the products or materials, composition, intended use, customer or consumer group, storage and distribution conditions, shelf life or service life, packaging, relevant claims and foreseeable misuse. Current flow diagrams shall cover each process, movement, storage step, rework or return path, outsourced activity and relevant utility interface. Flow diagrams shall be verified on site at least annually and after material change.

2.3 Hazard identification and control measures. The assessment shall consider biological, chemical, physical, allergen, radiological where relevant, fraud, malicious contamination, legal, quality and product-integrity hazards reasonably associated with the activity. Controls shall be selected based on risk and shall identify responsibility, monitoring or checks, acceptance criteria, records, response to failure and verification. Critical control points, preventive controls or other essential controls shall be clearly distinguished.

2.4 Limits, monitoring and deviation response. Where safety or legality depends on an operational limit, validated or legally supported limits shall be defined. Monitoring shall be capable of detecting loss of control in time to prevent release or distribution of affected product. Documented actions shall define containment, identification of affected product, correction, investigation, authorized disposition, restoration of control and prevention of recurrence following failure of an essential control.

2.5 Validation and verification. Control measures shall be validated before implementation and after changes that may affect effectiveness. The overall plan shall be verified at least annually and after a significant incident, change, new information or evidence of ineffective control.

2.6 [F] Product defense. A documented vulnerability assessment and product-defense plan shall identify credible intentional contamination, tampering, sabotage or theft risks. Access, visitor, contractor, vehicle, utility, information and high-risk-area controls shall be implemented, tested and reviewed at least annually.

2.7 Fraud and authenticity. Where the site purchases, handles, converts, manufactures or represents materials or products susceptible to substitution, dilution, counterfeiting or false claims, a documented vulnerability assessment and mitigation plan shall be maintained.

2.8 Business continuity. Contingency plans shall address disruption of water, power, refrigeration, compressed air, information systems, communications, labor, transportation, security and other services necessary to protect product and maintain traceability.

2.9 [F] Incident, withdrawal and recall. The site shall maintain a documented incident-management, withdrawal and recall process covering decision authority, product identification, traceability, notification, communication, recovery, disposition and effectiveness review. The system shall be tested at least annually.

2.10 Emergency contacts. Current contact information shall be maintained for responsible managers, customers, regulatory authorities, laboratories, emergency services and essential service providers. Contact lists and escalation expectations shall be tested or verified at least annually.

3 Product Safety and Quality Management System

Documented systems and reliable records shall demonstrate that requirements are controlled, implemented, independently checked and improved.

3.1 System, document and record control. Policies, procedures, work instructions, forms and reference materials required to operate the product-safety and quality system shall be organized, current, readily accessible and appropriate to the language and literacy needs of users. Documents shall be approved before issue, uniquely identified, version controlled, reviewed at a defined frequency, available at points of use and removed or clearly identified when obsolete. Changes and reasons for change shall be traceable. Records shall be legible, genuine, accurate, completed at the time of activity and protected from unauthorized alteration, loss or deterioration. Retention periods shall meet legal, customer and product-life requirements.

3.2 [F] Internal audit program. A documented, risk-based internal audit program shall cover all applicable requirements and activities at least annually. Auditors shall be competent and sufficiently independent of the activity audited.

3.3 Facility inspections and audit action. Documented inspections shall evaluate personnel practices, product handling, housekeeping, sanitation, equipment, building fabric, utilities, pest risks and grounds. Open-product and higher-risk areas shall be inspected at least monthly; other product areas shall be inspected at a risk-based frequency not less than quarterly. Internal audit and inspection results shall identify objective evidence, responsibility and required completion dates. Positive practices and recurring failures shall be communicated to responsible management.

3.4 [F] Corrective and preventive action. Nonconformities, significant deviations and recurring trends shall be corrected and investigated to determine root cause. Actions shall address cause, responsibility and completion date, and shall be verified for effective implementation and prevention of recurrence.

3.5 Complaints, trends and improvement. Complaints shall be recorded, assessed for product-safety, legal, quality and integrity significance, investigated to an appropriate depth, trended and used to identify corrective or preventive action. Relevant data shall be periodically analyzed to identify deterioration, recurrence, emerging risk and improvement opportunities. Actions resulting from trend analysis shall be documented and followed to completion.

3.6 Specifications and requirement review. Current, authorized specifications shall define requirements for raw materials, ingredients, packaging materials, processing aids, finished products, storage conditions, transport and contracted services as applicable. Customer and contractual requirements shall be reviewed before acceptance and after change to confirm that the site has the capability and controls necessary to meet them.

3.7 Nonconforming product, hold and release. A documented system shall identify, segregate or electronically control, assess and dispose of nonconforming or suspect product and materials. Status shall be clear and inadvertent use or release shall be prevented. Positive hold, testing hold and other restricted-status product shall be released only by authorized personnel after all defined criteria and records have been satisfactorily completed.

3.8 Laboratory and testing controls. Tests used to make product-safety, legal or release decisions shall use suitable methods and competent personnel. External laboratories shall be accredited to a relevant standard or otherwise demonstrate competence where accreditation is not legally or contractually required.

3.9 Data integrity and electronic systems. Electronic records and systems used for product status, monitoring, traceability, formulation, label or process control shall have authorized access, backup, recovery, change control and protection against unauthorized alteration.

4 Supplier, Service-Provider and Material Control

Purchased materials and services shall be approved and monitored according to their potential effect on product safety, legality, quality and integrity.

4.1 [F] Supplier approval and evidence. A documented, risk-based procedure shall approve and monitor suppliers of raw materials, ingredients, packaging, processing aids and other product-contact materials. Approval shall be completed before routine purchase or use. Approval shall use one or more suitable methods such as recognized certification, supplier audit, documented questionnaire, compliance history, analytical testing, certificate review or other technically justified evidence. A current list or controlled system shall identify approved suppliers, materials or services, approval status, restrictions and review dates.

4.2 Emergency purchasing. Emergency or one-time purchases from unapproved sources shall be authorized, risk assessed and subject to enhanced receipt, verification or testing controls before use.

4.3 Supplier performance monitoring. Supplier performance shall be reviewed at a defined frequency using relevant data such as conformity, complaints, delivery, test results, incidents, audit results, certification status and responsiveness to corrective action.

4.4 Service providers and agreements. Providers of transport, warehousing, pest management, sanitation, waste, laundry, laboratories, calibration, maintenance, temporary labor, software or outsourced processing shall be approved and monitored according to risk. Written agreements shall define relevant service scope, responsibilities, product conditions, hygiene, security, traceability, records, notification of incidents and change, and access for monitoring or audit.

4.5 Compliance information and material status. Certificates of analysis, conformity declarations, food-contact statements, allergen information, safety data, regulatory documentation or other required information shall be available, current and linked to the supplied material where applicable. Incoming materials shall be identified and controlled by lot, batch or other suitable code. Approval, quarantine, rejection, allergen, food-contact and other relevant status shall remain clear through use or dispatch.

4.6 Supplier change notification. Suppliers shall be required to notify the site of changes that may affect composition, source, site of manufacture, processing, food-contact status, allergen profile, specification, certification or legal compliance.

4.7 Claims and chain of custody. Where products or materials carry origin, sustainability, identity-preserved, religious, organic, non-GMO, recycled-content or other claims, evidence and segregation shall support the claim throughout the site's control.

4.8 Outsourced processing. Outsourced manufacturing, conversion, packing, rework, inspection or storage activities shall be included in the site's risk assessment, specifications, approval, traceability, change management and performance monitoring.

5 Site, Utilities, Equipment and Maintenance

Facilities, utilities and equipment shall be designed, located, maintained and controlled to protect products and enable effective hygiene, inspection and operations.

5.1 Location, grounds and site map. The site shall assess external contamination, flooding, neighboring activity, airborne material and pest risks. Grounds, access routes, vegetation, drainage and waste areas shall be maintained to minimize risk. A current site plan shall identify buildings, product and material areas, risk zones, employee facilities, waste, chemical storage, utilities, water systems, pest devices, traffic patterns and relevant product or personnel flows.

5.2 Product and personnel flow. Layout, barriers, zoning and working practices shall prevent contamination, cross-contact, mix-up and unauthorized access during receipt, production, storage, rework, returns and dispatch.

5.3 Building fabric and drainage. Floors, walls, wall-floor junctions, ceilings, overheads, drains, doors, windows and structural surfaces shall be sound, cleanable and maintained without holes, flaking material, uncontrolled leaks, condensation or other contamination hazards. Drainage shall be adequate for the activity. Standing water, backflow, aerosol generation and transfer of contamination from drains shall be prevented or controlled.

5.4 Loading protection and pest proofing. Loading, unloading and external movement shall protect susceptible materials and products from precipitation, standing water, dust, pests, temperature abuse and other environmental damage. Openings, penetrations, doors, dock equipment and service entries shall be sealed, screened or otherwise controlled to prevent pest entry while permitting safe operation.

5.5 Lighting and brittle materials. Lighting shall support safe operation, inspection and cleaning. Glass, brittle plastic, ceramic and similar materials in product areas shall be excluded, protected or controlled through an inventory, inspection and breakage procedure.

5.6 Ventilation and air quality. Ventilation, air movement, extraction and filtration shall be suitable for the product and process risk. Condensation, mold, fumes, dust and transfer of airborne contamination between zones shall be prevented.

5.7 Water, ice, steam and backflow. Water used as an ingredient, product-contact medium, cleaning medium or source for product-contact ice or steam shall be from an approved source and meet applicable microbiological and chemical requirements. Verification and sampling shall be based on risk and law. Water and utility systems shall be designed and maintained to prevent backflow, back-siphonage and cross-connections. Required devices shall be identified, inspected and tested at defined frequencies.

5.8 Personnel facilities. Toilets, handwashing, changing, locker, break and welfare facilities shall be sufficient, clean and located so they do not create contamination risk. Toilets shall not open directly into exposed-product areas.

5.9 Equipment suitability and hygienic design. Equipment, utensils, racks, pallets and material-handling devices shall be suitable for intended use, cleanable, maintained and constructed of materials that do not contaminate or damage product.

5.10 Preventive maintenance and temporary repairs. A documented program shall cover production, packaging, storage, transport, utilities, monitoring devices, building fabric and grounds. Work shall be prioritized according to product risk and completed within defined timeframes. Temporary repairs shall be controlled, documented, safe, readily cleanable where necessary and assigned a time limit for permanent correction. Tape, string, cardboard, wire or similar materials shall not be used as uncontrolled permanent repairs.

5.11 Maintenance hygiene, parts and lubricants. Maintenance activity shall protect exposed product and product-contact surfaces. Tools, parts and debris shall be controlled, and affected equipment or areas shall be cleaned, inspected and formally released before use. Maintenance materials, lubricants, tools and small parts shall be identified, appropriately stored and controlled. Food-grade or product-compatible materials shall be used where incidental contact is reasonably foreseeable.

5.12 Calibration and out-of-tolerance equipment. Measuring and monitoring devices affecting safety, legality or quality shall be identified, protected and calibrated or verified at defined frequencies against traceable standards where available. A documented assessment shall determine the effect on product and records when measuring or monitoring equipment is found outside acceptable limits. Affected product shall be controlled and corrective action recorded.

5.13 Refrigeration and controlled utilities. Refrigeration, controlled-atmosphere, compressed-air and other essential systems shall be maintained and monitored according to risk. Alarm, leak, failure and emergency-response arrangements shall be defined.

5.14 Outdoor storage and waste infrastructure. Outdoor storage shall be minimized and justified by risk assessment. Materials shall be protected, identified, inspected and stored on suitable surfaces with drainage and pest controls. Waste, recycling and by-product areas and containers shall be designed, located, identified and maintained to prevent leakage, pest attraction, product confusion and unauthorized recovery.

6 Personnel, Training and GMP Practices

Personnel, visitors and contractors shall be competent and shall follow hygiene and working practices appropriate to the products, materials and areas they enter.

6.1 Training program and instruction before work. A documented program shall identify induction, job-specific, GMP/GWP, product safety, food defense, allergen, chemical, emergency and refresher training needs according to role and risk. Personnel shall receive necessary instruction and supervision before working without direct oversight. Refresher training shall be completed at least annually or more frequently where risk, change or performance indicates.

6.2 Competence and temporary personnel. Training records shall identify the person, date, subject, trainer and method. Competence shall be evaluated through observation, questioning, testing, demonstration or performance review. Temporary, agency and contracted personnel shall receive role-appropriate training and supervision. Their competence and compliance shall be monitored.

6.3 Health reporting and personal hygiene. Personnel and relevant visitors shall report symptoms, diagnoses, exposure or conditions that could contaminate product. Restrictions, return-to-work and confidential handling shall comply with applicable law. Handwashing, bathing where relevant, hair and facial-hair restraint, glove use and other hygiene practices shall be defined by area and risk and consistently followed.

6.4 Protective clothing. Suitable protective clothing shall be provided, stored, worn, changed and laundered at frequencies that prevent contamination. Clean and used clothing shall be segregated where necessary.

6.5 Personal items, eating and tobacco use. Jewelry, watches, phones, medicines, keys, tools and personal belongings shall be restricted and controlled according to product and foreign-material risk. Eating, drinking, chewing, smoking and vaping shall be restricted to designated areas. Waste and movement from these areas shall be controlled.

6.6 Cuts and dressings. Cuts and grazes shall be covered with site-issued, detectable dressings where exposed product or food-contact materials are handled. Issuance and loss shall be controlled.

6.7 Visitors and drivers. Visitors, drivers and regulatory personnel shall be informed of applicable hygiene, security, illness and movement rules. Untrained persons shall be escorted where required by risk.

6.8 Practice verification. Supervisors and internal inspections shall verify personnel practices. Noncompliance shall be corrected promptly and recurring behavior shall trigger investigation, retraining or other effective action.

7 Sanitation, Chemical, Pest and Environmental Controls

The site shall maintain sanitary conditions through risk-based cleaning, chemical control, environmental monitoring, integrated pest management and waste control.

7.1 [F] Sanitation program and procedures. A documented master sanitation and housekeeping program shall cover equipment, utensils, structures, product areas, storage, vehicles, employee facilities, grounds and periodic cleaning tasks. Responsibilities and verification shall be defined. Procedures shall identify the item or area, responsible person, method, tools, chemicals, concentration, temperature, contact time, disassembly and reassembly where applicable, frequency, records and acceptance criteria.

7.2 Cleaning validation and verification. Cleaning methods affecting allergen, microbiological, chemical or other product-safety risks shall be validated before routine use and after significant change. Completion and effectiveness shall be verified using methods appropriate to risk, including visual inspection, pre-operational inspection, ATP, allergen testing, microbiological testing or other suitable measures.

7.3 Cleaning tools and zoning. Cleaning tools shall be suitable, maintained, stored hygienically and segregated or visually identified for incompatible zones such as restrooms, drains, floors, allergen areas and product-contact surfaces.

7.4 Chemical approval, concentration and use. Chemicals shall be approved for intended use, identified, accompanied by current safety and technical information, stored securely and segregated, dispensed into labeled containers and disposed of legally. Chemical concentration, temperature, contact time and application shall follow the approved label, technical instruction or validated procedure. Where concentration affects effectiveness or safety, it shall be checked and recorded.

7.5 Water, compressed air and dry-cleaning practices. Use of water, high pressure, compressed air, sweeping and other cleaning methods shall be controlled to prevent aerosols, spread of contamination, damage or contamination of product and packaging. Where water creates microbial or quality risk, dry-cleaning methods, controlled wet cleaning and documented restart criteria shall be established.

7.6 Environmental monitoring and response. A documented environmental monitoring program shall be implemented where risk assessment, product type, process exposure or law indicates. The program shall define organisms or indicators, zones, sites, frequency, methods, laboratory, limits and actions. Environmental results shall be reviewed for trends and investigated when limits, patterns or pathogen findings indicate loss of control. Corrective actions shall address product impact, intensified sampling, harborage and verification. Potentially affected product shall be placed on hold when a positive or unacceptable result may affect conformity. Disposition and release shall be authorized and supported by the investigation; repeat testing shall not be used solely to invalidate an unfavorable result.

7.7 Integrated pest management. A written, site-specific integrated pest management program shall prevent entry and harborage, monitor activity and provide timely correction. The program shall be based on a documented assessment and current site conditions.

7.8 Competent pest service. Pest management shall be performed by licensed or otherwise legally authorized and competent personnel. Contracts shall define responsibilities, frequency, devices, approved chemicals, emergency contacts, records and recommendations.

7.9 Pest survey, map and devices. A current site survey and device map shall support risk-based placement. Devices shall be suitable, secured where necessary, inspected at defined frequencies and positioned so they do not contaminate product or attract pests into sensitive areas.

7.10 Pesticide and bait control. Pesticides and rodenticides shall be approved, labeled, stored and applied according to law and label directions. Application records shall identify material, registration where applicable, target pest, amount, location, method, date and applicator.

7.11 Pest sightings and trends. Personnel shall be trained to report pest evidence. Sightings, catches, species, locations, structural conditions and recommendations shall be trended and used to verify corrective-action effectiveness.

7.12 Birds and wildlife. Bird, animal and non-target wildlife access, nesting, feeding and contamination shall be prevented. Evidence affecting product shall trigger immediate containment, cleaning, assessment and correction.

7.13 Waste and employee areas. Waste and recycling shall be identified, segregated and removed at a frequency that prevents contamination, odor, microbial growth and pest attraction. Containers in exposed-product areas shall be suitable and covered where necessary. Breakrooms, restrooms, lockers, offices, laboratories, battery-charging and other support areas shall be cleaned and maintained so they do not compromise product areas.

8 Receiving, Storage, Traceability, Dispatch and Transport

Product and materials shall remain identified, protected, within specification and traceable from receipt through storage, internal movement, dispatch and transportation.

8.1 Receiving inspection, rejection and quarantine. Incoming vehicles, containers, bulk systems, materials and products shall be inspected according to risk for cleanliness, integrity, damage, infestation, contamination, temperature, seals, prior load information and required documentation. Unacceptable or suspect deliveries shall be rejected or placed under controlled status. The reason, affected lot, decision and disposition shall be documented.

8.2 Bulk receiving. Bulk intake points, lines, caps, hoses, couplings, filters and hatches shall be identified, secured, protected and inspected. Prior-load, wash or cleanliness evidence shall be obtained where relevant.

8.3 Storage practices, status and segregation. Materials and products shall be stored on suitable pallets, slip sheets or racking; protected from floor, wall, overhead and environmental contamination; and arranged to permit inspection, cleaning, stock control and pest monitoring. Allergen, chemical, maintenance, rejected, returned, rework, food-contact, non-food and other incompatible materials shall be identified and segregated physically or by an effective controlled system.

8.4 Stock rotation and environmental conditions. A documented FIFO, FEFO or other justified stock-rotation system shall be used. Aged, slow-moving and insect-susceptible materials shall be identified and inspected at a risk-based frequency. Specified temperature, humidity and other environmental limits shall be established and maintained. Sensors shall be suitably located, and storage areas shall be mapped or otherwise evaluated to identify worst-case conditions.

8.5 Monitoring and alarms. Conditions affecting product safety or quality shall be monitored at a frequency capable of detecting loss of control. Alarms shall be tested, access to records maintained and corrective actions documented.

8.6 Sampling and internal movement. Sampling procedures shall protect product, preserve lot identity, use suitable equipment and prevent contamination. Opened containers shall be resealed, identified and returned to controlled status. Materials moved between locations, vessels, lines, work areas or warehouses shall retain identity, lot status, storage conditions and traceability.

8.7 Product handling and returns. Handling, stacking, forklifts, clamps, conveyors, picking and staging shall prevent damage, contamination, allergen cross-contact, mix-up and temperature abuse. Returned product shall be identified, segregated, assessed by authorized personnel and released, reworked or disposed of according to documented criteria. Traceability and reason for return shall be retained.

8.8 Loading and transport controls. Loading areas, vehicles and containers shall be inspected and documented before loading. Where temperature is controlled, vehicles shall be preconditioned as needed and capable of maintaining specification. Transport agreements shall define cleanliness, previous-load restrictions, segregation, temperature, loading, security, records, breakdown, delay, incident response and responsibility for sanitary conditions.

8.9 [F] Traceability system. The site shall trace each lot or defined unit to the immediate supplier and immediate customer and through all internal receipt, processing, repacking, storage, hold, rework and dispatch activities. Packaging and processing aids affecting conformity shall be included.

8.10 Traceability and recall exercises. The traceability system shall be tested at least twice each year across representative product groups and activities. Exercises shall include reconciliation or mass balance and should be completed within four hours unless a stricter legal or customer requirement applies. At least annually, the site shall test decision-making, contact, notification, recovery, reconciliation and disposition elements of its withdrawal or recall plan. Gaps shall be corrected and effectiveness verified.

8.11 Distribution records and load security. Records shall identify product, lot or code, quantity, status, dispatch date, carrier or conveyance and initial delivery location. Records shall support rapid retrieval and legal traceability requirements. Loads and product-access areas shall be secured against tampering, theft and unauthorized access. Seals or other controls shall be verified where used, and discrepancies shall be investigated before acceptance or release.

8.12 Transport temperature, cleaning and prior loads. Where transport conditions affect conformity, continuous monitoring or a validated alternative shall demonstrate conditions throughout the journey. Excursions shall be evaluated by authorized personnel before release. Owned, leased and contracted vehicles shall be cleaned and inspected at risk-based frequencies. Previous loads shall be evaluated when they could introduce allergen, chemical, odor, pest or microbiological risk.

8.13 Breakdown and delay. Documented contingency arrangements shall protect product during vehicle, refrigeration, route, power or communication failure. Product status and decisions shall remain traceable.

8.14 Destruction and surplus product. Unsafe, obsolete, customer-branded or controlled product and packaging transferred for destruction shall remain secure and traceable. Destruction evidence and authorization shall be retained.

8.15 By-products and animal feed. By-products or downgraded materials intended for animal feed shall be identified, segregated, protected from contamination and pest attraction, and handled in accordance with applicable law.

9A Food Manufacturing Module

Food manufacturing sites shall control hazards arising from ingredients, formulation, processing, exposed product, rework, labeling and finished-product release.

Applicability: This module is audited in addition to Sections 1-8 when the activity is included in the audit scope. Requirements may be rated not applicable only when the auditor records an objective, scope-based justification.

M1 [F] Food safety plan and prerequisite programs. A written food safety plan based on Codex HACCP principles or applicable preventive-control law shall cover all products and processes in scope and shall be prepared or overseen by a properly qualified person. Prerequisite programs necessary to support the hazard analysis shall be documented, implemented and verified. The relationship between prerequisite programs and identified hazards shall be clear.

M2 Process-flow verification. Flow diagrams shall include receiving, preparation, processing, delays, rework, waste, utilities, packaging, storage and dispatch and shall be verified while operations are occurring.

M3 Process specifications and essential controls. Validated or technically supported process parameters, tolerances, equipment settings and product criteria shall be available to operators and reflected in production records. CCPs and other preventive or essential controls shall have defined limits, monitoring responsibility, method, frequency, records, corrective action and verification.

M4 Process deviations. Deviation procedures shall identify affected product back to the last acceptable check, place product under control, restore the process, determine disposition and investigate cause.

M5 Foreign-material assessment and device operation. A documented assessment shall determine the need and location for sieves, filters, magnets, metal detection, X-ray, optical sorting or other controls. Controls shall be located at the last practical effective point where appropriate. Foreign-material devices shall reject or otherwise control suspect product, prevent unauthorized adjustment and be challenged at defined frequencies using suitable test pieces or verification methods.

M6 Foreign-material failure, screens and magnets. Failure procedures shall isolate and reassess product produced since the last acceptable check, identify the contaminant source, restore control and document authorized release or disposition. Screens, filters, strainers and magnets shall be identified, inspected and maintained. Damage or unexpected material shall trigger product assessment and investigation.

M7 [F] Allergen controls and changeover. All allergens present in materials, rework, processing aids, employee food and other credible sources shall be identified. Controls shall address supplier information, storage, scheduling, movement, utensils, rework, cleaning, verification and labeling. Changeover and cleaning procedures shall prevent allergen carryover. Methods shall be validated and routinely verified at frequencies based on risk.

M8 Formula, recipe, label and packaging control. Authorized formulations and recipes shall be current and protected from unauthorized change. Ingredient identity, quantity and addition shall be verified and traceable. Labels and packaging shall be approved against the current formulation, specification and destination-market requirements. Changes shall be reviewed by competent authorized personnel.

M9 Line clearance and coding. At start-up, changeover and end of run, the site shall verify removal of obsolete materials and correct product, packaging, lot, date, allergen, barcode and other variable information.

M10 Work-in-process and rework. WIP and rework shall be identified, protected, time or temperature controlled where needed, lot traceable and used only under authorized, compatible conditions.

M11 Product-contact containers and utensils. Containers, utensils, scoops, pens and small tools shall be suitable, clean, identifiable and controlled to prevent cross-contact, contamination and foreign material.

M12 High-risk zoning and environmental monitoring. Where product supports pathogen growth or is exposed after a lethality or control step, zoning, barriers, personnel movement, air, cleaning, equipment and environmental monitoring shall be based on documented risk. Facilities producing exposed ready-to-eat food shall maintain an environmental pathogen or indicator program unless a documented scientific assessment demonstrates that it is not applicable.

M13 Product testing, release and disposition. Sampling plans, methods, laboratories, specifications and release rules shall be defined. Product shall remain on hold when results are required for release. Finished product shall not be released until required process, testing, label, coding, quantity, packaging and record checks are complete and authorized.

M14 Shelf life. Shelf life and storage instructions shall be supported by validation, history, testing or other technically justified evidence and reviewed after relevant change.

M15 Product development and trials. New products, trials and changes shall be assessed for hazards, allergens, legality, process capability, cleaning, labeling, shelf life, traceability and customer requirements before commercial release.

M16 Packaging integrity. Seal, closure, vacuum, modified-atmosphere, container or other packaging-integrity controls affecting safety or shelf life shall have defined criteria, monitoring and response.

9B Packaging Materials Module

Packaging manufacturers and converters shall ensure that materials are suitable, legal, hygienic, correctly printed or formed, protected from mix-up and traceable for their intended food or product-contact use.

Applicability: This module is audited in addition to Sections 1-8 when the activity is included in the audit scope. Requirements may be rated not applicable only when the auditor records an objective, scope-based justification.

P1 [F] Packaging HARA and intended use. A documented HARA shall evaluate product-safety, legality, quality and integrity risks associated with raw materials, conversion, printing, coatings, storage, transport and the packaging's intended use. Specifications shall identify whether packaging is direct food contact, indirect contact or non-contact and shall define foreseeable food type, temperature, time, barrier, functional and customer-use conditions.

P2 Material composition and raw-material control. Composition, additives and restrictions shall be known to the extent necessary to demonstrate legal and customer compliance. Required declarations, supporting documentation and conditions of use shall be current. Paper, board, polymers, films, foil, glass, metal, inks, coatings, adhesives, additives and recycled inputs shall be approved, specified, identified and traceable.

P3 Inks, coatings, adhesives, solvents and migration. Storage, mixing, issue, use and disposal shall prevent use of incorrect, obsolete or unsuitable materials and shall control migration, set-off, odor, taint, curing and residual-solvent risks where relevant. Testing, supplier declarations, calculations or other technically justified evidence shall demonstrate suitability for intended food-contact and use conditions where applicable.

P4 Recycled and recovered materials. Recycled, reprocessed or recovered materials shall be risk assessed and controlled for source, contamination, composition, traceability, legal compliance and customer acceptance.

P5 Artwork, copy, print and tooling control. Customer artwork, specifications and master copy shall be formally approved and version controlled. Responsibilities for text, allergen, legal, barcode and graphic content shall be defined. Printing plates, cylinders, screens, dies, digital files and other product-specific tooling shall be identified, protected, issued and removed under controlled conditions to prevent unauthorized or obsolete use.

P6 Line clearance and mix-up prevention. Start-up and changeover controls shall remove prior materials, waste, labels, tooling and documents and verify the correct job, substrate, print, code and packing configuration.

P7 Process parameters and in-process inspection. Critical conversion, curing, drying, lamination, coating, forming, sealing, sterilization or other process parameters shall be defined, monitored and recorded where they affect conformity. Inspection and testing shall verify dimensions, color, print, registration, barcode, adhesion, seal, strength, cleanliness, coating, quantity and functional characteristics according to specification and risk.

P8 Automated inspection systems. Vision, barcode, camera and automated rejection systems shall be challenged at defined frequencies, protected from unauthorized adjustment and linked to response procedures.

P9 Foreign-material prevention. Blades, knives, needles, staples, fasteners, fragments and other foreign-material risks shall be controlled. Issuance, condition, breakage and reconciliation shall be documented where appropriate.

P10 Hygiene zoning. Hygiene controls, clothing, cleaning, material protection, air and personnel movement shall reflect the intended use and contamination sensitivity of the packaging.

P11 Samples and finished-product protection. Where required by risk, specification or customer agreement, representative production samples shall be identified, protected and retained for a defined period. Packaging shall be adequately wrapped, sealed, labeled, palletized and stored to prevent contamination, damage, odor absorption, mix-up and deterioration.

P12 Traceability and reconciliation. Traceability shall link finished packaging to raw materials, inks, coatings, tooling or artwork version, production line, date and relevant process records. Printed or customer-branded material quantities shall be reconciled where diversion or mix-up risk exists.

P13 Customer property. Customer-owned artwork, tooling, materials, files and samples shall be identified, protected and reported if lost, damaged, obsolete or unsuitable.

P14 Nonconforming and obsolete print. Rejected, obsolete, overrun and customer-branded packaging shall be securely controlled and rendered unusable or destroyed according to authorization and customer requirements.

P15 Product defense and fraudulent material. The site shall control unauthorized access, counterfeit or substituted materials, theft of branded packaging and misuse of customer intellectual property according to assessed risk.

P16 Change notification. Customers shall be notified and approval obtained where required before changes to composition, source, manufacturing site, process, tooling, artwork, food-contact status or recycled content.

9C Storage and Distribution Module

Warehouses, distribution centers, cross-docks and transport operations shall maintain product condition, identity, security and traceability throughout storage and movement.

Applicability: This module is audited in addition to Sections 1-8 when the activity is included in the audit scope. Requirements may be rated not applicable only when the auditor records an objective, scope-based justification.

D1 [F] Product, service and customer requirements. The site shall assess hazards associated with product categories, packaging condition, storage environment, handling, cross-docking, picking, repacking, transport and outsourced services. Contracts or specifications shall define storage, handling, temperature, humidity, segregation, rotation, transport, security, reporting and emergency expectations.

D2 Warehouse zoning and receipt. Layout and status controls shall segregate food, packaging, chemicals, allergens, damaged goods, returns, waste, non-food products and other incompatible materials. Receipt checks shall verify vehicle cleanliness, structural condition, pests, odors, prior-load risk, seal, load stability, product integrity, identification and required environmental conditions.

D3 Storage configuration. Stacking, rack loading, pallet quality, clearances, aisle access and material-handling practices shall protect product and enable cleaning, inspection, rotation and emergency access.

D4 Temperature mapping, alarms and response. Temperature-controlled rooms, trailers and systems shall be mapped or otherwise validated under representative worst-case conditions. Sensor locations and alarm limits shall reflect the results. Alarms shall be tested at a defined frequency. Response shall identify affected stock, excursion duration, product assessment, authorized disposition and restoration of control.

D5 Picking and cross-docking. Picking, consolidation, staging and loading systems shall maintain product identity, lot status, rotation, customer requirements and order accuracy. Cross-docked product shall remain protected, identified, traceable and within specified environmental conditions. Staging time, segregation, inspection and transfer responsibility shall be defined.

D6 E-commerce and parcel fulfillment. Where products are packed for parcel shipment, the site shall control order accuracy, compatible products, protective packaging, temperature media, substitutions, delivery time and seasonal conditions.

D7 Returns and damaged stock. Returned, refused, recalled, damaged or leaked product shall be segregated, assessed and dispositioned by authorized personnel. Salvage shall not compromise safety, legality or customer ownership.

D8 Transport-provider, vehicle and trailer management. Carriers and brokers shall be approved according to product risk and monitored for equipment, cleaning, temperature capability, security, training, legal compliance and incident performance. Owned or controlled vehicles and refrigeration units shall be maintained, inspected and cleaned. Repairs shall not introduce contamination or compromise temperature control.

D9 Previous loads and sanitation. Previous-load restrictions and cleaning evidence shall be defined for relevant products. Loads presenting allergen, chemical, odor, pest or microbiological risk shall not be accepted without effective controls.

D10 Journey conditions. Routes, duration, seasonal conditions, loading pattern, door openings and refrigeration capability shall be considered when establishing transport controls.

D11 Load security and seals. Seal issue, application, recording, verification and discrepancy response shall be controlled where seals are used. Unauthorized access or broken seals shall trigger documented assessment.

D12 Breakdown and incident response. Vehicle failure, refrigeration loss, accident, delay, rejected delivery and security events shall be communicated promptly and managed under documented product-protection and disposition procedures.

D13 Open-product or repacking activities. Open-product handling, repacking, relabeling, inspection or other added services shall be separately scoped, risk assessed and controlled using applicable food-manufacturing or packaging requirements.

D14 Automation and warehouse systems. Warehouse-management systems, robotics, scanners and automated status or location controls shall be validated for intended function, access controlled, backed up and subject to contingency plans.

D15 Customer-owned product. Ownership, status, location, damage, loss and disposition of customer product shall remain identifiable and shall be reported according to agreement.

Appendix A - Definitions

Term	Definition
Audit	A systematic, independent and documented process for obtaining objective evidence and evaluating conformity to defined requirements.
Correction	Action taken to eliminate a detected nonconformity or immediately control its effect.
Corrective action	Action taken to eliminate the cause of a nonconformity and prevent recurrence.
Food safety plan	A documented HACCP or legally applicable hazard-analysis and preventive-control system for food manufacturing, processing, packing or holding.
Fundamental requirement	A requirement central to the effectiveness of the Standard and identified by [F].
HARA	Hazard and risk analysis used to evaluate product-safety, legal, quality and integrity risks, particularly for packaging materials and non-food operations.
Open product	Food, food-contact packaging or another sensitive material exposed to the surrounding environment and not fully protected by sealed packaging.
Product	Food, ingredient, packaging material, finished packaging, customer-owned goods or other material included in the audit scope.
Product safety	Controls necessary to prevent a product from causing harm or becoming unsuitable for its intended and foreseeable use.
Service provider	An external organization providing an activity that may affect product conformity, including transport, storage, pest management, sanitation, laboratory, maintenance or labor.
Site	The buildings, grounds, operations, personnel and controlled activities included within the defined audit scope.
Validation	Obtaining evidence that a control measure or combination of measures is capable of effectively controlling the identified hazard or risk.
Verification	Application of methods, procedures, tests or evaluations, in addition to monitoring, to determine whether a control operates as intended.

Appendix B - Indicative Critical Findings

Critical classification depends on objective evidence, scope, product status and actual or imminent risk. The following examples are indicative and are not automatically critical in every circumstance:

B.1 Actual contamination. Direct contamination of exposed product or product-contact material by sewage, glass, pesticide, animal feces, pathogen or another hazardous material without effective containment.

B.2 Loss of critical control. Failure to monitor or correct loss of a CCP, preventive control or equivalent essential control where affected product may have been released.

B.3 Undeclared allergen. Release or imminent release of product with an undeclared allergen or materially incorrect allergen information.

B.4 Pathogen release. Release of product subject to a confirmed unacceptable pathogen result, or repeat testing used solely to disregard the original result.

B.5 Deliberate falsification. Intentional falsification of safety, legality, traceability, monitoring, test or disposition records.

B.6 Recall incapability. Inability to identify or control affected product during an actual incident when immediate action is required.

B.7 Illegal or unsafe operation. A condition that makes continued manufacture, storage or distribution unlawful and creates an immediate product-safety risk.

B.8 Uncontrolled malicious act. Evidence of deliberate contamination, tampering or unauthorized access affecting product with no effective containment.

Appendix C - Common Inspection Evidence

Control area	Examples of objective evidence
Leadership	Policy; objectives; culture plan; organization chart; management review; meeting records; resource decisions.
Risk management	HACCP or HARA; flow diagrams; validation; verification; defense and fraud assessments; incident and continuity plans.
Management system	Controlled procedures; record-retention rules; internal audits; GMP/GWP inspections; complaints; corrective actions; trend reports.
Suppliers	Approved lists; risk assessments; audits; questionnaires; certifications; specifications; declarations; performance reviews; agreements.
Site and equipment	Site map; maintenance schedule; work orders; glass register; water records; calibration; utility and alarm checks.
Personnel	Training matrix; induction; competence checks; illness rules; clothing and laundry controls; visitor and contractor records.
Sanitation and pest	Master schedule; procedures; chemical records; cleaning validation and verification; environmental monitoring; pest maps and trends.
Operations	Receiving and dispatch records; temperature records; stock status; vehicle checks; prior loads; traceability and recall exercises.
Manufacturing	Process records; CCP or preventive-control monitoring; allergen controls; line clearance; foreign-material checks; testing and release.
Packaging	HARA; composition and food-contact evidence; artwork approval; print and tooling control; inspection; samples; reconciliation.
Distribution	Temperature mapping; alarm checks; carrier approval; route and journey controls; seals; cross-dock or e-commerce records.

Appendix D - Applicability Matrix

Requirement group	Food manufacturing	Packaging materials	Storage/distribution
Sections 1-8 common core	Required	Required	Required
9A Food Manufacturing	Required	When food processing is conducted	When open-product processing or food manufacture is conducted
9B Packaging Materials	When packaging is manufactured or converted	Required	When packaging is manufactured, converted or printed
9C Storage and Distribution	When separate warehousing or distribution services are material to scope	When separate warehousing or distribution services are material to scope	Required
Open-product controls	According to product and zone risk	According to intended-use and hygiene risk	Required when product is exposed or repacked
Temperature-controlled controls	When product or process requires	When material conformity requires	When product or customer requires

Appendix E - Reference Framework

This independent Standard was developed with consideration of the following public regulatory and industry frameworks. References identify source frameworks only; they do not incorporate copyrighted certification requirements or create endorsement.

E.1 Codex Alimentarius. General Principles of Food Hygiene, CXC 1-1969, including the HACCP system and guidelines for its application.

E.2 United States food regulation. 21 CFR Part 117, Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food.

E.3 United States sanitary transport. 21 CFR Part 1, Subpart O, Sanitary Transportation of Human and Animal Food, where applicable.

E.4 Canada. Safe Food for Canadians Regulations, including applicable preventive-control, preventive-control-plan and traceability requirements.

E.5 Mexico. NOM-251-SSA1-2009, Prácticas de higiene para el proceso de alimentos, bebidas o suplementos alimenticios, as applicable.

E.6 BRCGS Food Safety. Global Standard Food Safety, Issue 9, and current mandatory position statements.

E.7 BRCGS Packaging Materials. Global Standard Packaging Materials, Issue 7, and current mandatory position statements.

E.8 BRCGS Storage and Distribution. Global Standard Storage and Distribution, Issue 4, and current mandatory position statements.

Regulatory precedence: Where a legal, regulatory, permit, customer or product-specific requirement is stricter than this Standard, the stricter applicable requirement shall control. Sites are responsible for maintaining current official sources.

Appendix F - Inspection Report Content

Report element	Minimum expectation
Site and scope	Legal and trading name; address; activities; products or materials; modules; shifts; buildings; exclusions and justification.
Inspection information	Date; duration; auditor(s); announced or unannounced status; site representatives; records period reviewed.
Site profile	Employee count; facility size; principal processes; storage conditions; major customers or markets where relevant.
Objective evidence	Representative records, observations, interviews, traceability exercise and process or facility areas assessed.
Findings	Clause; classification; clear statement of requirement failure; objective evidence; affected product, area or record period.
Results	Domain scores; weighted total; finding totals; rating; conditions preventing approval; required corrective-action deadline.
Scope limitations	Unavailable activities, records, personnel or areas and the effect on audit confidence or result.
Authorization	Auditor authorization, technical review where required and final statement status after corrective-action closure.

Appendix G - Accreditation and Claims Controls

Control	Normative requirement
Inspection body	The legal entity or defined part of a legal entity responsible for inspection decisions, reports and conformity statements.
Accredited inspection	An inspection performed after formal grant and entirely within the inspection body's accredited scope.
Non-accredited service	A gap assessment, self-assessment, consulting engagement or other activity outside the accredited scope; it shall be clearly identified and shall not imply accreditation.
Independence	Inspection assignments shall satisfy the independence classification and safeguards accepted by the accreditation body. Unacceptable threats shall cause reassignment, additional safeguards or refusal of the work.
Competence	Inspectors, technical reviewers and authorizers shall be approved for the applicable sector, process, module and role before performing unsupervised work.
Method control	This Standard, worksheets, sampling instructions, scoring logic and report forms shall be controlled and validated before use and after material change.
Accreditation claims	No report, website, proposal, statement or mark shall imply accreditation before grant or beyond the granted scope.
Mixed-scope reports	Reports containing both accredited and non-accredited activities shall clearly distinguish them and comply with the accreditation body's symbol and claims rules.
Confidentiality	Client and site information shall be protected, and any legal or contractual disclosure shall be handled through the controlled confidentiality procedure.
Records	Inspection and decision records shall be identifiable, traceable, secure, retrievable and retained for the period defined by law, contract and the management system.
Prohibited representation: Publication or use of this Standard shall not be described as accreditation, certification, GFSI recognition, BRCGS certification, regulatory approval or product certification.	

Appendix H - Supporting Management-System Documents

The following documents are necessary to operate this Standard as an accreditation-ready inspection program. They form part of TAC's management system but do not change the 131 site requirements.

Controlled document or process	Purpose
Scheme Operations Manual	Defines inspection types, scope rules, duration, sampling, workflow, independence safeguards and authorization.
Quality management system	Controls organization, responsibilities, risks, documents, records, data and consistent operation.
Impartiality procedure and risk register	Identifies, evaluates, treats and periodically reviews threats to impartiality and independence.
Contract-review procedure	Confirms scope, method, competence, resources, time, legal criteria and accreditation eligibility before acceptance.
Competence matrix and authorization records	Defines qualification, training, witnessed assessment, monitoring and authorization by sector and role.
Inspection duration and sampling method	Provides reproducible risk factors, minimum coverage, adjustment rules and required records.
Technical-review and decision procedure	Ensures independent review, correction, authorization and control of final conclusions.
Report and statement forms	Controls required content, unique identification, revisions, signatures and accredited-scope declarations.
Complaints and appeals procedure	Provides independent, timely and documented review without discriminatory action.
Accreditation symbol and claims procedure	Prevents misleading use and separates accredited from non-accredited work.
Internal audit and management review	Evaluates conformity and effectiveness of the management system and inspection operations.
Corrective-action and improvement process	Controls investigation, cause analysis, correction, effectiveness review and prevention of recurrence.