Starbucks

Standards for Food Suppliers

2nd Edition

May 15, 2013

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Introduction

Suppliers requirements:

The Starbucks Coffee Company Standards for Food Suppliers have been established to: clarify the minimum requirements for any business entities manufacturing, processing, packing or holding food to Starbucks Company; and to ensure that suppliers consistently deliver products that are safe, legally compliant with all applicable codes and regulations (locally and in countries where the products are intended to be commercialized), and conformed to agreed quality specifications.

Independently to these minimum requirements, the suppliers shall always comply with local government regulations and codes. In the unlikely event that local regulations or circumstances are contrary to Starbucks Coffee Company expectations, the supplier shall seek for a written variance grant from a Starbucks Coffee Company officer (at least Vice President level). Request and response to request shall be documented.

Starbucks recognizes all GFSI benchmarked standards and associated certifications (i.e. BRC, Global Standards, SQF 2000, FSSC 22000, IFS) and will consider that food suppliers holding a valid GFSI benchmark certificate from an accredited certification body, relevant to the business engaged with Starbucks, meets Starbucks food safety and quality minimum expectations.

Compliance assessment:

Present day – Dec 31st 2004:

Food manufacturers that are not yet certified to a GFSI benchmarked scheme should adjust their system and practices and prepare their path to certification. In the meantime, Starbucks will continue with its current approval and verification program, which may include a questionnaire, review of 3rd party certification and facility assessment performed by a Starbucks employee or by a designated external audit provider.

Effective as of June 1, 2015:

Starbucks expects that all its food suppliers' manufacturing facilities providing Starbucks branded products, Starbucks implied products (i.e. with no brand identification) or custom made products, will be certified to a GFSI benchmarked scheme by June 1, 2015.

Supplier manufacturing facilities providing Starbucks branded products, Starbucks implied products (i.e. with no brand identification) or custom made products, that are not certified to a GFSI benchmarked scheme by an accredited certification body will be audited, at the supplier's cost, by an external audit provider designated by Starbucks.

For food suppliers that are not included in the scope of the above two paragraphs, Starbucks will continue with its current approval and verification program, which may include a questionnaire, review of 3rd party certification and facility assessment performed by a Starbucks employee or by a designated external audit provider.

Evidence of compliance with Starbucks Standards for Food Suppliers will not eliminate Starbucks audit, but those assessments will be more focused on Starbucks relevant products and associated processes compliance rather than on system compliance. Starbucks assessment frequency and protocol will be determined by the type of products supplied, by the supplier certification scheme, grade/level and service provider and by the performance history with Starbucks.

Section 1: Management system and commitment

The supplier shall have a Food Safety Management System that is documented, implemented, maintained, continually improved and supported by its senior management. The food safety management system shall include the following elements:

1.1 Food safety policy

- The supplier shall have a documented food safety policy statement and objectives specifying the extent of the supplier's commitment to consistently produce safe, legal products, compliant to the specifications of its customers.
- The policy shall be signed by the person with overall responsibility for the site. Evidence must show policy has been effectively communicated to all staff.
- The food safety policy shall be associated to clear objectives, targets and measures of success that are monitored and reported at a defined frequency.

1.2 Food safety and quality manual and documents

- The supplier shall have a Food Safety Manual or documented Quality Management System. The scope should be appropriate to the range of business activities covered, including documented procedures to related process steps.
- Documents shall be reviewed and approved by a designated, trained personnel
- A master document (or equivalent if using an electronic system) shall identify the current version of documents
- Documents shall be available and current at all locations where they are needed to support the effective execution of operations.
- Records shall be genuine, readily available and complete
- Records shall be completed by operators and verified by a relevant supervisor or relevant employee in an authoritative position
- All records (processes and products) shall be retained for a period of at least 12 months beyond the unopened shelf life of the product.

1.3 Management responsibility

- The supplier shall establish a clear organizational structure, which unambiguously defines and documents the job functions, responsibilities and reporting relationships of at least those staff whose activities affect food safety.
- Absence coverage shall be clearly identified for all positions relevant to food safety and quality.
- The designated leader for food safety and quality shall be independent and report to a manager whose objectives encompass food safety and quality.

1.4 Management commitment and resource management

- The supplier's senior management shall provide evidence of their commitment to establish, implement, maintain and improve the food safety system.
- Senior management shall regularly be trained to food safety and quality management relevant topics. Schedules and records shall be available to demonstrate attendance.
- Key evidence from senior management to demonstrate commitment may include but is not limited to the following:
    - Determining and providing, in a timely manner all the resources, human and financial, needed to implement, maintain and continuously improve the food safety system
    - Senior management with food safety knowledge and involvement into relevant food safety activities

1.5 Management review

- The supplier's senior management shall review the verification of the food safety system, HACCP Plan or HACCP based plans, at planned intervals, to ensure their continuing suitability, adequacy and effectiveness. The HACCP Plan shall also be reviewed in the event of any change that impacts food safety. Such a review shall evaluate the need for changes to the food safety system, including the food safety policy and food safety objectives.
- Monitored measures and results associated to the food safety policy and its objectives shall be reported to the supplier's senior management at least on a quarterly basis and shall lead to timely, documented actions as well as verification activities to ensure those actions were effective and that issues have been resolved.

1.6 Internal and external audit

- Internal audits shall be scheduled and carried out on a frequent basis, covering the entire facility and all aspects of the quality management system.
- All internal auditors shall be trained in audit techniques and independent of the audit area.
- An external, 3rd party food safety inspection shall be conducted on an annual basis.
- Results of internal and external audit shall be documented.
- Corrective actions planning and implementation should begin immediately upon the receipt of 3rd party audit results and evidence must show them to be effective and shall be implemented within the permitted timeframe provided by the auditor or certification body.

1.7 Product complaint handling

- All complaints shall be recorded, investigated and the results of the investigation and root cause of the issue recorded where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.
- Complaint data shall be analyzed for significant trends and used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.

1.8 Corrective action

- The company shall be able to demonstrate that they use the information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence.
- The company shall have a documented procedure for handling non-conformances identified within the scope their quality management system
- Corrective actions shall be clear, assigned to a suitably competent and authorized person, able to address the immediate issue and have the ability to prevent re-occurrence sustainably.
- A documented verification shall be in place to ensure that corrective actions are implemented and are effective.

1.9 Traceability

- The company shall be able to trace all raw material product lots (including packaging) from their supplier through all stages of processing and dispatch to their customer and vice versa.
- Identification of raw materials, including primary and any other relevant packaging and processing aids, intermediate/semi-processed products, part-used materials, finished products and material pending investigation, shall be adequate to ensure traceability. Lots shall be clearly defined.
- The company shall test the traceability system across the range of product groups to ensure traceability can be determined from raw material to finished product and vice versa, including quantity check/mass balance. This shall occur at a predetermined frequency and results shall be retained for inspection. The test shall take place at least annually. This traceability exercise should be achievable within 4 hours and identify 100% of product.
- Where rework or carryover is performed, traceability shall be maintained.

1.10 Control of non-conforming product

- The company shall ensure that any out-of-specification product is effectively identified, and quarantined to prevent accidental release.
- The company shall ensure that responsibilities are clearly defined for decision making on the use or disposal of products appropriate to the issue, e.g. destruction, reworking, downgrading to an alternative label or acceptance by concession
- Decisions and associated actions are recorded

1.11 Management of incidents, product withdrawal and product recall

- The company shall have a plan and system in place to effectively manage food safety and / or quality incidents and enable the effective withdrawal and recall of products should this be required. This shall include as a minimum:
    - Identification of key personnel constituting the recall management team, with clearly identified responsibilities
    - Guidelines for deciding whether a product needs to be recalled or withdrawn and the records to be maintained

    - An up-to-date list of key contacts or reference to the location of such a list, e.g. recall management team, emergency services, suppliers, customer, Certification Body, regulatory authority
    - Communication plan including the provision of information to customer, consumers and regulatory authorities in a timely manner
    - Details of external agencies providing advice and support as necessary, e.g. specialist laboratories, regulatory authority and legal expertise
- The procedure shall be capable of being operated at any time.
- The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.

1.12 Food defense

- A food security/food defense program shall be in place and annually assessed. This program aims to protect food products from intentional adulteration (microbiological, chemical, physical or other) and includes physical, personal and operational security measures.
- Measures shall be in place to ensure only authorized personnel have access to production and storage areas and access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be in place. Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.

Section 2: Personnel

The supplier shall define, implement and document good practices relevant to all personnel, employees, agency staff, contractors and visitors, to ensure that personnel activities are not a source or a vector of product contamination.

2.1 Training

- All relevant personnel, including temporary staff and contractors, shall be appropriately trained prior to commencing work, adequately supervised throughout the working period and retrained as needed. The training shall include as a minimum basic hygiene and relevant operations.
- Where personnel are engaged in activities relating to critical control points, relevant training and competency assessment shall be in place.
- Training records shall be kept and include name of trainer, trainees, title and content of the course, date and duration.
- Activities shall be taken and documented to demonstrate the effectiveness of the training

2.2 Personal Hygiene

- The requirements for personal hygiene shall be documented, adequately communicated to all personnel and enforced at all time.
- Watches shall not be worn.
- Jewelry shall not be worn, with the exception of a plain wedding ring or wedding wristband. In the event of such exception, the ring or wristband shall be completely covered
- Rings and studs in exposed parts of the body, such as ears, nose, tongues and eyebrows, shall not be worn.
- Fingernails shall be kept short, clean and unvarnished. False fingernails shall not be permitted.
- Excessive perfume or aftershave shall not be worn.
- Hand cleaning shall be performed on entry to the production areas and at a frequency that is appropriate to minimize the risk of product contamination.
- All cuts, open wounds or lesions on exposed skin shall be covered by an appropriately colored bandage that is different from the product color (preferably blue) and containing a metal detectable strip. These shall be company issued and monitored. Where appropriate, in addition to the plaster, a glove shall be worn.
- Where metal detection equipment is used, a sample from each batch of bandage shall be successfully tested through the equipment and records shall be kept.
- Processes and written instructions for staff shall be in place to control the use and storage of personal medicines, so as to minimize the risk of product contamination.

2.3 Medical Screening

- The company shall have a procedure which enables notification by employees, including temporary employees, of any relevant infection, disease or condition with which they may have been in contact or be suffering from.
- Where there may be a risk to product safety, visitors and contractors shall be required to complete a health questionnaire or otherwise confirm that they are not suffering from a condition which may put product safety at risk, prior to entering the raw material, preparation, processing, packing and storage areas.
- There shall be documented procedures for employees, contractors and visitors, relating to action to be taken where they may be suffering from or have been in contact with an infectious disease. Expert medical advice shall be sought where required.

2.4 Protective Clothing – Employees or visitors to production areas

- The company shall document and communicate to all employees, contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. high-care or low-risk areas). This shall also include policies relating to the wearing of protective clothing away from production environment (e.g. removal before entering toilets, use of canteen and smoking areas).
- Protective clothing shall be designed to prevent contamination of the product (as a minimum containing no external pockets above the waist or sewn on buttons)

- Scalp and facial hair shall be fully contained to prevent product contamination in food handling areas.
- Laundering of protective clothing shall take place by an approved contracted or in-house laundry using a validated process.
- If gloves are used, there should be a process in place to effectively manage their condition so as not to pose any potential food safety risk to product. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive color (blue where possible), be intact and not shed loose fibers.

Section 3: Facility and Equipment Control

3.1 External standards

- The production site shall be of suitable size, location, construction and design to reduce the risk of contamination and facilitate the production of safe and legal finished products.
- The production site shall have all appropriate registrations and / or certifications to conduct business and manufacture food product
- External areas shall be maintained in good order. (e.g. elimination of bird roosting sites, sealing gaps around pipes to prevent pest entry, ingress of water and other contaminants, grass and planted areas are tended).

3.2 Layout, product flow and segregation

- The product flow from intake to dispatch shall be arranged to prevent product contamination
- The premises shall allow sufficient working space storage to enable all operations to be carried out under hygienic conditions.
- Physical barriers or effective procedures shall be in place between high and low risk operations to minimize the risk of product contamination.
- Segregation shall take into account the flow of product, nature of materials, equipment, personnel, airflow and services.
- The flow of waste shall be organized to minimize product contamination.

3.3 Building infrastructure

- The fabrication of the site, buildings and facilities shall be suitable for the intended purpose.
- Walls shall be constructed, finished and maintained to prevent the accumulation of dirt, minimize condensation and mold growth, and facilitate cleaning.
- Wall/floor junctions shall be designed and maintained to facilitate cleaning. Floors shall be suitably hard wearing to meet the demands of the process, and withstand cleaning materials and methods. They shall be impervious and maintained in good repair.
- Drainage shall be sited, designed and maintained to minimize risk of product contamination and not compromise product safety. Drains shall flow away from high-risk areas.

- Drains shall be of a design that enables effective cleaning.
- Ceilings and overheads shall be constructed, finished and maintained to prevent the accumulation of dirt and facilitate cleaning and be made of a material suitable for the production environment.
- Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed and designed for permanent placement.
- Where there is a risk to product, windows, and roof glazing which is designed to be opened for ventilation purposes, shall be adequately screened to prevent the ingress of pests.
- Where they pose a risk to product, glass windows shall be resistant to breakage and designed to be contained in the event of breakage.
- Doors shall be maintained in good condition. External doors and dock levelers shall be close fitting or adequately sealed to prevent the ingress of environment concerns or pests.
- Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.
- Where they constitute a potential risk to product; Bulbs and strip lights – including those on electric fly-killer devices – shall be protected. Where full protection cannot be provided, alternative management such as wire mesh screens or monitoring procedures shall be in place.
- Adequate ventilation and extraction shall be provided in product storage and processing environments to control condensation or excessive dust.
- Screened or filtered air and positive pressure systems shall be in place in high risk areas and adequately maintained.

3.4 Utilities – water, ice, air and other gases

- All water used as a raw material in the manufacture of processed food, the preparation of product, or for equipment or plant cleaning shall be supplied in sufficient volume and pressure, be potable at point of use or pose no risk of contamination according to applicable legislation. The microbiological and chemical quality of water shall be analyzed at least annually.
- An up-to-date plan shall be available of the water distribution system on site, including holding tanks, water treatment and water recycling as appropriate. The plan shall be used as a basis for water sampling and the management of water quality.
- Air, other gases and steam used directly in contact with or as an ingredient in products shall be monitored to ensure this does not represent a contamination risk. Compressed air used directly in contact with the product shall be filtered.

3.5 Equipment

- All food processing equipment shall be suitable for the intended purpose and shall be constructed of appropriate materials.
- The design and placement of equipment shall ensure it can be effectively cleaned and maintained.

- Equipment in direct contact with food shall be suitable for food contact and meet legal requirements where applicable.
- All equipment shall be adequately maintained, serviced and operated to produce safe products.

3.6 Maintenance

- A documented system of planned maintenance shall be in place covering all items of equipment which are critical to product safety.
- In case of issues, technical support shall be immediately available (e.g. a minimum of one engineer on site during production).
- Maintenance shall be carried out in a manner to minimize the risk of contamination of products.
- Outside contractors and engineers involved in the maintenance or repair activities shall be made aware of, and adhere to, the site hygiene standards.
- Tools used in high risk areas shall be dedicated to that area or shall be decontaminated on entry to the high risk area.
- The site shall maintain a spare library or ensure that spare parts can be obtained in a timely manner for all equipment that is critical to product safety.
- Maintenance work shall be followed by a hygiene clearance procedure that ensures that product contamination hazards have been removed from machinery and equipment. On completion of any maintenance work, machinery and equipment shall be clean and free from contamination hazards.
- A system shall be in place to ensure that all parts removed and all tolls used during maintenance are accounted for.
- Lubricating oil and paints shall be suitable for the intended use (food grade where applicable).

3.7 Staff facilities

- Personal items shall be stored separately from workwear within the changing facilities. Facilities shall be available to separate clean and dirty workwear (where applicable).
- Suitable and sufficient hand washing facilities shall be provided at all access points to the food handling areas and appropriate points within the production area. The hand washing facilities shall provide as a minimum: sufficient quantity of water at an appropriate temperature, liquid soap, single-use towels or suitably designed and located air driers, hand washing instructions.
- Toilets shall be segregated and shall not open directly into food preparation, handling or storage areas
- All changing rooms shall be adequately equipped and maintained to minimize the risk of food contamination.
- Where provided, in-house catering facilities shall be controlled to prevent contamination of products and covered by internal audits.
- Where an operation includes a high-risk area, personnel shall enter via a specially designated changing facility with arrangements to ensure that protective clothing will not be contaminated

before entry to the high-care area. The changing facilities shall incorporate the following requirements:

- clear instructions for the order of changing into dedicated protective clothes to prevent the contamination of clean clothing
- dedicated footwear, by exception shoe coverings shall be provided for visitors only to be worn in the high-care area
- an effective system shall be provided to segregate areas for wearing high-care from other footwear (e.g. a barrier or bench system) or there shall be an effective boot wash on entrance to the high-care area
- protective clothing shall be visually distinctive from that worn in lower risk areas and shall not be worn outside of the high-care area
- hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing
- Upon entry to high-care areas, hand-washing and disinfection shall be provided.

- Where smoking is permitted by law, designated controlled smoking areas shall be provided which are both isolated from production areas to an extent that ensures smoke cannot reach the product and fitted with sufficient extraction to the exterior of the building.

3.8 Storage Facilities

- All facilities used for the storage of ingredients, packaging, in-process product and finished products shall be clean, well-organized and suitable for its purpose. Products shall be raised from the floor, covered and away from the walls.
- A risk assessment shall be developed to prevent relevant cross-contamination during receiving, storage and handling activities and practices shall ensure no cross contamination of product occur during those operations.
  - Segregation shall be in place with regards to allergens, raw/cooked products
  - Based on applicable legislation, claims and customer requirements, segregation may be in place with regards to religion related programs (Kosher. Halal), diet preference (vegetarian/non vegetarian), GMO/Non-GMO, and allergens.
- Receipt documents, product identification and / or facility design shall facilitate correct stock rotation of raw materials, intermediate products and finished products in storage and ensure materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life.

3.9 Dispatch and Transport

- Documented procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include as appropriate:
  - controlling temperature of loading dock areas
  - securing loads on pallets to prevent movement during transit
  - inspection of loads prior to dispatch

- All vehicles used for the transports of raw materials, including packaging, and finished goods, shall be suitable, hygienic and in good repair. Records shall be complete and demonstrate on-going compliance.
- Chilled/frozen products shall be transported with appropriate vehicles capable to maintain products required temperature during the entire transport. The temperature of the vehicles and/or of the products they transport shall be monitored and documented to ensure and demonstrate compliance.
- Maintenance systems (preventive maintenance and repair) and documented cleaning procedures shall be maintained for all vehicles and equipment used for loading/unloading (e.g. hoses connecting to silo installations). There shall be records of the measures taken.
- The company shall have documented procedures for the transport of products, which shall include:
    - any restrictions on the use of mixed loads,
    - requirements for the security of products during transit, particularly when vehicles are parked and unattended,
    - clear instructions in the case of vehicle breakdown,
      accident or failure of refrigeration systems which ensure the safety of the products is assessed and records maintained.

Section 4: Environment control

4.1 Plant hygiene

- Housekeeping and cleaning systems shall be in place which ensure appropriate standards of hygiene are maintained at all times and the risk of product contamination is minimized.
- Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures shall as a minimum include the:
    - responsibility for cleaning
    - item/area to be cleaned
    - frequency of cleaning
    - method of cleaning, including dismantling equipment for cleaning purposes where required
    - cleaning chemical and concentrations
    - cleaning materials to be used
    - cleaning records and responsibility for verification.

  The frequency and methods of cleaning shall be based on risk.

- The effectiveness of the cleaning procedures and practices shall be clearly defined based on potential hazards (limits of acceptable and unacceptable microbiological and allergens levels),

verified through visual hygiene audits and swabbing programs (ATP bioluminescence techniques, microbiological testing or chemical testing as appropriate.) and documented. Records shall be used to identify trends in cleaning performance and instigate improvements where required.

- Cleaning equipment shall be fit for purpose, suitably identified for intended use, e.g. color coded or labeled, cleaned, sanitized and stored in a hygienic manner to prevent contamination.
- There shall be a maintenance for sanitation program developed to ensure good working condition of all sanitation equipment and utensils.
- Equipment used for cleaning in high-care and high-risk areas shall be dedicated for use in that area.
- Dry cleaning techniques (vacuum cleaning or squeegees) shall be used during in-production cleaning to minimize the opportunity to cross-contaminate through aerosols.
- Any cleaning procedure which results in the creation of condensation must be identified and steps shall be taken to dry and sanitize affected areas before production starts.

4.2 Waste/Waste Disposal

- Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of product contamination and the attraction of pests.
- In the production areas, there shall be effective procedures in place to minimize the accumulation of waste.
- External waste collection containers and rooms housing waste facilities shall be clearly identified, designed for ease of use and effective cleaning, well-maintained to allow cleaning and, where required; Disinfection, emptied at appropriate frequencies, covered or doors kept closed as appropriate.
- Where licensing is required for the disposal of categorized waste, it shall be removed by licensed contractors and records of disposal shall be maintained and available for audit.

4.3 Pest Control

- The company shall either contract the services of a competent pest control organization, or shall have appropriately trained staff, for the regular inspection and treatment of the site to deter and eradicate infestation. Training records and certificates, when applicable, shall be in place to demonstrate their competency.
- If the company uses a contract service, they shall have a valid pest control contract which clearly defines the service provided and reflects the activity of the site.
- Qualified pest control activities shall be conducted at least on a monthly basis.
- Pest control documentation and records shall be maintained. This shall include as a minimum:
- an up-to-date plan of the full site identifying numbered pest control device locations
    - identification of the baits and/or monitoring devices on site
    - clearly defined responsibilities for site management and for the contractor

    - details of pest control products used, including instructions for their effective use and action to be taken in case of emergencies
    - any observed pest activity
    - details of pest control treatments undertaken.
    - Trend analysis, recommendations and actions taken to prevent reoccurrence.
- Electric fly killing devices and/or pheromone traps shall be correctly sited and operational.

Section 5: Supply control

5.1 Supplier approval and performance monitoring

- Procedures for the selection, approval and monitoring of suppliers shall be in place.
- The procedures shall define how exceptions are handled (e.g. where raw material suppliers are prescribed by a customer or where products are purchased from agents and direct audit or monitoring has not been undertaken).
- Supplier shall be able to demonstrate that materials are only purchased from approved sources.
- All new suppliers shall be assessed initially by means of self-questionnaires, audits or certifications by third parties.
- All suppliers shall be periodically assessed. The frequency of this assessment shall be based on the vendor rating of the supplier (rating may consider product risk, past assessment or issues).
- In the event that suppliers monitoring activities identify opportunities for improvements, relevant actions shall be defined, implemented, verified for their effectiveness and documented.
- All suppliers of produce should assure that commodities have met all appropriate Good Agriculture Practice and Good Handling Practice Requirements conducted by an approved auditing organization.

5.2 Raw material and packaging specifications

- Specifications for all food contact packaging shall be available and evidence that packaging conforms to food grade standards shall be available.
- Specifications for all raw materials shall be available, adequate, accurate and ensure compliance with relevant food safety and legislative requirements.
- Changes to food contact packaging or raw materials used for Starbucks product, shall not be made without the approval of Starbucks assigned authority.

5.3 Raw material and packaging approval and monitoring

- Integrity checks on the packaging of all incoming goods shall be carried out.

- All incoming goods shall be checked and recorded on receipt to ensure compliance with specification. Checks shall be executed by a trained personnel and shall at least include:
    - Temperature (for temperature sensitive products)
    - Date checks
    - Visual checks (clear accept/reject criteria)
- Temperature controlled products shall not be accepted if the temperature is above legal requirements.
- A procedure shall be in place to ensure that all out of specification incoming goods are quarantined and clearly labeled to prevent these products from being used.
- Certificates of Analysis for products requirement microbiological assessment shall be held on file.

5.4 Outsourcing

- Where the company chooses to outsource any process that may affect food safety, the company shall ensure control over such processes. Control of such outsourced processes shall be identified, documented, and monitored within the food safety management system.

Section 6: Product control

6.1 Product Design/Development

- The company shall provide clear guidelines on any restrictions to the scope of new product developments to control the introduction of hazards which would be unacceptable to the company or customers (e.g. the introduction of allergens glass packaging or microbiological risks).
- All new products and changes to product formulation, packaging or methods of processing shall be formally approved by the HACCP team leader or authorized HACCP committee member.
- Trials using production equipment shall be carried out where it is necessary to validate that product formulation and manufacturing processes are capable to producing a safe product of the required quality.
- Shelf-life trials shall be undertaken using documented protocols reflecting conditions experienced during storage and handling. Results shall be recorded and retained and shall confirm compliance with relevant microbiological, chemical and organoleptic criteria. Shelf life studies shall incorporate predictable abuse (storage/handling/temperature). Where shelf-life trials prior to production are impractical, for instance for some long-life product, a documented science-based justification for the assigned shelf life shall be produced.
- All products shall be labeled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer. There shall be a process to verify that ingredient and allergen labeling is correct based on the product recipe.

- Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. a nutritional claim, reduced sugar), the company shall ensure that the product formulation and production process is fully validated to meet the stated claim.

6.2 Finished product specifications

- Specifications shall be available for all finished products. These shall either be in the agreed format of the customer or, in the case of branded products, include key data to meet legal requirements and assist the customer in the safe usage of the product.
- Changes to Starbucks Coffee Company's finished products specifications, associated processes, food contact packaging or ingredients shall not be made without the approval of Starbucks assigned authority.

6.3 Chemical and physical product contamination control

- Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product.
- There shall be an approved list of chemicals for purchase.
- Chemical specifications and material safety data sheets shall be available for all chemicals on the suppliers property
- All cleaning chemicals shall be segregated in secure storage with restricted access to authorized persons and properly labeled.
- Wood used in processing area shall be maintained so as not to pose a potential food safety risk.
- Metal detection devices shall be in place on all lines, unless a risk assessment demonstrates that this does not improve the protection of final products from metal contamination. The metal detector shall have a line stop, alarm or verified rejection system to signify the present of metal contamination.
- When appropriate, there must be adequate systems in place for the removal of physical product risks (magnet, filter, sieve, X-ray, optical sorting equipment). Each system shall have documented validation and verification that proves its effectiveness.
- Glass or other brittle materials shall be excluded or protected against breakage in areas where open products are handled or there is a risk of product contamination. All glass windows should be designed and maintained so as not to pose a potential risk to product.
- Documented procedures for handling glass and other brittle materials shall be in place and implemented to ensure that necessary precautions are taken. Procedures shall include as a minimum:
    - a list of items detailing location, number, type and condition
    - recorded checks of items, carried out at a specified frequency that is based on the level of risk to the product
    - detail on cleaning or replacing items to minimize potential for product contamination.
- Documented procedures detailing the action to be taken in case of breakage of glass or other brittle items shall be implemented and include the following:
    - quarantining the products and production area that were potentially affected

    - cleaning the production area
    - inspecting the production area and authorizing to continue production
    - changing of workwear and inspection of footwear
    - specifying those staff authorized to carry out the above points
    - record of the breakage incident.
- A knife control policy, for facilities that require them in production or handling areas, shall be in place to ensure that all broken knifes are immediately identified and the necessary actions are taken to prevent the contamination of the products.

6.4 Management of Allergens

- The company shall carry out an assessment of raw materials to establish the presence and likelihood of contamination by allergens. This shall include review of raw material specifications and, where required, obtain additional information from suppliers, for example through questionnaires to understand the allergen status of the raw material, its ingredients and the factory in which it is produced.
- The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products and any new product development ingredients or products.
- Routes of contamination shall be risk assessed and procedures for handling raw materials, intermediate and finished products documented to ensure cross contamination is avoided.
- Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers, the company shall ensure that the production process is fully validated to meet the stated claim. This shall be documented.
- Equipment or area cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination by allergens. The cleaning methods shall be validated to ensure they are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use.
- All relevant personnel, including engineers, temporary staff and contractors, shall have received general allergen awareness training and be trained in the company's allergen handling procedures.
- An effective system of documented checks shall be in place at line start-up, following product changeover and changes in batches of packaging to ensure that the labels applied are correct for the products packed.

6.5 Product Inspection and Laboratory Testing

- There shall be a defined program of product inspection and testing. This may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, frequency and specified limits shall be documented.

- Test and inspection results shall be recorded and reviewed regularly to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.
- Where testing laboratories are present on the manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. Documented controls shall include:
    - Design and operations of drainage and ventilation system
    - Access and security of the testing facility
    - Movement of laboratory personnel
    - Protective clothing arrangements
    - Disposal of laboratory waste
- Onsite laboratories must operate in accordance with Good Laboratory Practices including:
    - Use of recognized test methods
    - Documented testing procedures
    - Ensuring staff are suitably qualified/trained and competent to carry out the analysis required
    - Use of a system to verify the accuracy of test results
    - Use of appropriately calibrated and maintained equipment.
- Where an external laboratory is used for product analysis, the laboratory should accredited to ISO 17025 or equivalent.
- The company shall ensure that finished product is not released unless all agreed procedures have been followed.
- Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and release authorized.

Samples of every production shall be retained at the production premises for the duration of the shelf life.

Section 7: Process control

7.1 Control of Operations

- Documented process specifications and work instructions shall be available for the key processes in the production of products to ensure product safety, legality and quality. The specifications as appropriate shall include but not limited to:
    - recipes – including identification of any allergens
    - mixing instructions, speed, time
    - equipment process settings
    - cooking times and temperatures
    - cooling times and temperatures

    - labeling instructions
    - coding and shelf life marking
    - any additional control points
- Process monitoring, such as of temperature, time, pressure and chemical properties, shall be implemented, adequately controlled and recorded to ensure that product is produced within the required process specification.
- In circumstances where process parameters are controlled by in-line monitoring devices, these shall be linked to a suitable failure alert system that is routinely tested.
- Where variation in processing conditions may occur within equipment critical to the safety or quality of products, the processing characteristics shall be validated at a frequency based on risk and performance of equipment (e.g. heat distribution in retorts, ovens and processing vessels; temperature distribution in freezers and cold storage).
- In the case of equipment failure or deviation of the process from specification, procedures shall be in place to establish the safety status and quality of the product to determine the action to be taken.
- Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleaned and are ready for production. Documented checks shall be carried out at product changes to ensure all products and packaging from the previous production has been removed from the line before changing to the next production.
- Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labeled. These shall include checks at the start of packing, during the packaging run, following packaging changes and when changing batches of packaging materials, in order to ensure that correct packaging materials are used. The procedures shall also include verification of any code information or other printing carried out at the packing store.

7.2 Temperature control

- All temperature recording equipment shall be regularly calibrated to a recognized and / or certified standard. Where a traceable calibration is not possible, the company shall demonstrate the method and rationale of the standardization carried out.
- All temperature control equipment shall be checked on an on-going basis. Where temperature recording equipment is used, this shall be linked to a failure alert system which alerts the management.
- All food and beverage components must be maintained within their specified temperature range. All perishable foods shall be stored chilled.
- All food handling areas shall be kept at a temperature to ensure that the product maintains its safety and quality throughout its shelf life.

7.3 Quantity – Weight, Volume and Number Control

- The company shall operate a quantity control system which conforms to legal requirements in the country where the product is sold and any additional industry sector codes or specified customer requirement.
- The frequency and methodology of quantity checking shall meet the requirements of appropriate legislation governing quantity verification, and records of checks shall be maintained.
- Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product must conform to customer requirements and records shall be maintained.

7.4 Calibration and Control of Measuring and Monitoring Devices

- The company shall be able to demonstrate that measuring and monitoring equipment is sufficiently accurate and reliable to provide confidence in measurement results.
- All measuring equipment used to control Critical Control Points shall be calibrated to a recognized and / or certified standard.

Section 8: HACCP

8.1 Assemble the HACCP team

- The HACCP plan shall be developed and managed by a multi-disciplinary food safety team that includes those responsible for quality/technical, production operations, engineering and other relevant functions.
- The team leader shall have an in-depth knowledge of HACCP and be able to demonstrate competence and experience.
- The team members shall have specific knowledge of HACCP and relevant knowledge of product, process and associated hazards.
- In the event of the company not having appropriate in-house knowledge, external expertise may be used, but day-to-day management of the food safety system shall remain the responsibility of the company.

8.2 Describe the products in scope

- The scope of each HACCP plan, including the products and processes covered, shall be defined. The HACCP plan shall cover all Starbucks Coffee Company products.
- For each product or group of products a full description shall be developed, which includes all relevant information on food safety.

- All relevant information needed to conduct the hazard analysis shall be collected, maintained, documented and updated. The company will ensure that the HACCP plan is based on comprehensive information sources, which are referenced and available on request.

8.3 Describe the intended use

- The intended use of the product by the customer shall be described, defining the consumer target groups, including the suitability of the product for vulnerable groups of the population (e.g. infants, elderly, and allergy sufferers).

8.4 Develop a flow diagram

- A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP scope, from raw material receipt through to processing, storage and distribution.

8.5 Verify the flow diagram

- The HACCP food safety team shall verify the accuracy of the flow diagrams by on-site audit and challenge at least annually. Daily and seasonal variations shall be considered and evaluated. Records of verification of flow diagrams shall be maintained.

8.6 Conduct a hazard analysis

- The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and allergen risks (refer to clause 5.2). It shall also take account of the preceding and following steps in the process chain.
- The HACCP food safety team shall conduct a hazard analysis to identify hazards which need to be prevented, eliminated or reduced to acceptable levels. In addition to all applicable regulatory requirements, consideration shall be given to the following:
    - likely occurrence of hazard
    - severity of the effects on consumer safety
    - vulnerability of those exposed
    - survival and multiplication of micro-organisms of specific concern to the product
    - presence or production of toxins, chemicals or foreign bodies
    - contamination of raw materials, intermediate/semi-processed product, or finished product.
- Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.
- The HACCP food safety team shall consider the control measures necessary to prevent or eliminate a food safety hazard or reduce it to an acceptable level. Where the control is achieved through existing prerequisite programs, this shall be stated and the adequacy of the program to control the hazard validated. Consideration may be given to using more than one control measure.

8.7 Determine critical control points

- For each hazard that requires control, control points shall be reviewed to identify those that are critical. This requires a logical approach and may be facilitated by use of a decision tree. CCPs shall be those control points which are required in order to prevent or eliminate a food safety hazard or reduce it to an acceptable level. If a hazard is identified at a step where control is necessary for safety but the control does not exist, the product or process shall be modified at that step, or at an earlier or later step, to provide a control measure.

8.8 Establish critical limits

- For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control.
- The HACCP food safety team shall validate each CCP. Documented evidence shall show that the control measures selected and critical limits identified are capable of consistently controlling the hazard to the specified acceptable level.

8.9 Establish a monitoring system for each CCP

- A monitoring procedure shall be established for each CCP to ensure compliance with critical limits. The monitoring system shall be able to detect loss of control of CCPs and wherever possible provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list:
    - online measurement
    - offline measurement
    - continuous measurement, (e.g. thermographs, pH meters etc.)
    - where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product.
- Records associated with the monitoring of each CCP shall include the date, time and result of measurement and shall be signed by the person responsible for the monitoring and verified, as appropriate, by an authorized person. Where records are in electronic form there shall be evidence that records have been checked and verified.

8.10 Establish a corrective action plan

- The HACCP food safety team shall specify and document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate a trend towards loss of control. This shall include the action to be taken by nominated personnel with regard to any products that have been manufactured during the period when the process was out of control.

8.11 Establish verification procedures

- Procedures of verification shall be established to confirm that the HACCP plan, including controls managed by prerequisite programs, are effective. Examples of verification activities include:
    - internal audits

- review of records where acceptable limits have been exceeded
- review of complaints by enforcement authorities or customers
- periodic review of incidents of product withdrawal or recall.
- Results of verification shall be recorded and communicated to the HACCP food safety team.

8.12 HACCP documentation and record keeping

- Documentation and record keeping shall be sufficient to enable the company to verify that the HACCP controls, including controls managed by prerequisite programs, are in place and maintained.

8.13 Review and maintenance of the HACCP plan

- The HACCP food safety team shall review the HACCP plan and prerequisite programs at least annually and prior to any changes which may affect product safety. As a guide, these may include the following, although this is not an exhaustive list:

Section 9: Audit Rating

9.1 Deviation classification

Deviations observed during a Starbucks audit can be classified into 3 levels of severity:

- Minor:
  - There is a spot deviation from the standards but that deviation does not represent an immediate risk for food safety or quality.
  - Examples: A corrective action plan is not dated or was not checked for effectiveness. a cleaning opportunities was found in a low risk zone.
  - Minor count for 1 point
- Major:
  - There is a repeated, structural or severe deviation from the standard, that may represent a food safety risk or will likely lead to product quality issues.
  - Examples: The HACCP hazard analysis omits relevant hazards. An employee was seen not washing hands when entering high risk zone, Chemical concentration checks are not measured adequately, CP records deviations left unattended, loss of traceability.
  - Major count for 3 points
- Critical:
  - There is a severe, repeated and/or structural deviation from standards that could have an imminent food safety impact:
  - Examples: Severe pre-ops food contact equipment not cleaned and not detected by pre-ops crew, sign of rodent in the high risk area, CCP deviation records unattended, records are falsified
  - Critical count for 10 points

9.2 Section rating

Each of the standard section will be rated with one of the following rating:

1. Complies with Starbucks requirements: No more than 3 deviation points observed (i.e. no more than 3 minors or 1 major)
2. Opportunities to improve compliance: No more than 9 deviation points observed (i.e no more than 3 majors or 9 minors or a combination)
3. Immediate improvement required: 10 deviation points or more observed

9.3 Audit rating

- The overall audit rating is equal to the lowest section rating

S9.4 Actions associated to audit rating

Rating	New vendor	Existing vendor
Complies with Starbucks requirements	Approved – Continuous improvement is always expected.	Continuous improvement is always expected.
Opportunities to improve compliance	Not approved – until evidence are provided that non-compliances have been addressed	Must establish a corrective action plan within 2 weeks of being audited. Upon approval of the corrective action plan by Starbucks, the company shall implement and report evidence that the corrective actions are effective . Failure to demonstrate improvement will trigger a re-audit at vendor's cost.
Immediate improvement required	Not approved – The vendor must be re-audited.	Must be re-audited within 3 months. 2 consecutive "immediate improvement required" rating will lead to temporary or definitive termination.