



SQE Tracker May 2010

New (May 10) Format		Corresponding Feb 08 Section	Additions to May 10	Deleted/moved from Feb 08
CHAPTER 1 – INTRODUCTION		CHAPTER 1 – INTRODUCTION	This document does not apply to farm operations. References to packaging suppliers Process expectation named changed to Process Guidelines, may be receive Requirements for Brokers/Distributors/Traders	pg. 2 Foreword removed
1.1- Confidentiality		CHAPTER 2 – Confidentiality	Kraft Foods employee auditors shall not be asked or required to sign confidentiality agreements as a prerequisite to gaining access for audits prior to or at any time during a quality audit. Kraft Foods employee auditors will not audit or inspect financial data, sales data (other than that directly related to Kraft Foods), or pricing data. Kraft Foods employee auditors will not inspect personnel data, other than data relating to qualifications or training of technical and professional personnel performing functions pertinent to the audit.	
1.2- Notifying Kraft Foods of Significant Events		5.2- Communication with Kraft Foods	Notification list increased to include the following <ul style="list-style-type: none"> • Inadvertent release from Hold of any material produced for Kraft Foods. • Notification by law enforcement or other authority of a potential product security event. • Identification of an unlabeled allergen in material produced for Kraft Foods. • Inability to deliver materials that meet Kraft Foods Specifications • Changes to suppliers processes and/or facilities that could have an impact on materials supplied to Kraft Foods. • In the event of a pathogen positive result, Kraft contracting representative and Kraft Corporate Quality and Food Safety & Microbiology must be notified, even if the specific lot is not sent to Kraft Foods. Additional Kraft Foods contact no.	
CHAPTER 2 – QUALITY SYSTEM CONTROLS		CHAPTER 4 - QUALITY MANAGEMENT SYSTEM		
2.1- Quality Management System and Documentation		4.1- General Requirements 4.2- Documentation Requirements	GMO requirements No ionized ingredients shall be used to make Kraft Foods materials.	



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2.2- Kraft Foods Audit/Inspection requirements		CHAPTER 3 – Kraft Foods auditor access and audit/inspection requirements	Reference to Audit Requirements added. Audit requirements table to be available from Kraft Foods Representative (or website?) Kraft will bear its own internal costs and the Supplier will bear all other audit costs (including those of the third-party auditors).	Moved to section 1.2 The Supplier shall immediately notify the Kraft Foods contracting representative by phone and email, when any material produced for Kraft Foods is directly or indirectly the subject of regulatory contact, investigation or action. This may include regulatory actions or product retrievals by an external regulatory body. This does not include routine inspections made on a regular basis unless such a visit reveals a material produced for Kraft Foods is not in compliance with applicable law or regulations. The Supplier shall immediately notify the Kraft Foods contracting representative of any voluntary or involuntary retrieval of a product, which may have an impact on Kraft Foods.
2.3- Internal Audits		8.2- Internal Audits	Rewording and formatting	Moved to section 1.2 The Supplier shall immediately notify the Kraft Foods contracting representative by phone and email, when any material produced for Kraft Foods is directly or indirectly the subject of regulatory contact, investigation or action. This may include regulatory actions or product retrievals by an external regulatory body. This does not include routine inspections made on a regular basis unless such a visit reveals a material produced for Kraft Foods is not in compliance with applicable law or regulations. The Supplier shall immediately notify the Kraft Foods contracting representative of any voluntary or involuntary retrieval of a product, which may have an impact on Kraft Foods.



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2.4- Regulatory Inspections and contacts		5.1- Regulatory Inspections and Contacts		Moved to section 1.2 The Supplier shall immediately notify the Kraft Foods contracting representative by phone and email, when any material produced for Kraft Foods is directly or indirectly the subject of regulatory contact, investigation or action. This may include regulatory actions or product retrievals by an external regulatory body. This does not include routine inspections made on a regular basis unless such a visit reveals a material produced for Kraft Foods is not in compliance with applicable law or regulations. The Supplier shall immediately notify the Kraft Foods contracting representative of any voluntary or involuntary retrieval of a product, which may have an impact on Kraft Foods.
2.5- Food Defense		7.2- Food Defense	Now mandatory for all regions. Requirements simplified	
2.6- Testing Controls: Laboratory Requirements		8.1- Laboratory Operational Requirements	Rewording and formatting	
2.7- Testing Controls: Measuring & Monitoring Equipment		7.12- Calibration of Measuring & Monitoring Equipment	Rewording and formatting	
2.8- Corrective and Preventive Action (CP&A)	RESOURCE DOC SECTION B: Corrective and Preventive Action (CP&A)	8.7- Corrective and Preventive Action (CP&A)	Rewording and formatting, creation of additional appendix	
CHAPTER 3 - FACILITY ENVIRONMENT CONTROLS				
3.1- Good Manufacturing Practices (GMP)		6.1- Good Manufacturing Practices (GMP)	Rewording and formatting, in combination with corresponding appendix	
3.2- Personnel Training		6.2- Competence, Awareness and Training	• GMOs. When appropriate, employees involved in handling GMO materials must be trained as to procedures for handling these products (e.g., preventing co-mingling, how to also handle non-GMO materials).	
3.3- Employee Illness and Communicable Disease		6.3- Employee Illness and Communicable Disease	Rewording and formatting	
3.4- Plant Structure		6.5- Plant Structure	Rewording and formatting, in combination with corresponding appendix	
3.5- Utilities Management		6.4- Utilities	Rewording and formatting, in combination with corresponding appendix	



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	Management		
3.6- Equipment Design & Validation	6.7- Equipment Design & Validation	Rewording and formatting, in combination with corresponding appendix	
3.7- Equipment Maintenance	SECTION H: Equipment Maintenance	6.6- Maintenance Controls	Rewording and formatting
3.8- Sanitation		6.9- Sanitation Controls	Rewording and formatting Additional requested requirements <ul style="list-style-type: none"> • Situations when prolonged equipment downtime can lead to microbiological growth. • Protocols for extending production runs beyond established sanitation cycle times. • Adequate product protection when sanitation activities occur adjacent to operating production areas shall be established. • Cleaning In Place/Cleaning Out of Place (CIP/COP) or Assisted Cleaning Systems (ACS). • Equipment that is wet cleaned which needs to be used in a dry condition. • Periodic cleaning of overhead structures, including scheduled frequencies and documentation. • Floor drain sanitation, including a facility map with the exact location of each drain. High pressure hoses shall not be used as these promote aerosol formation and potentially enhance the spreading of organisms. Cleaning of drains must not be performed during production. • Use of food grade cleaning, sanitizing, and disinfecting products. • Appropriate sanitation-related measurement devices (e.g., thermometers, gauges, meters, solution strengths, circulation velocity) shall be calibrated. Sanitation verification (after wet cleaning) updated - If the equipment is not in use, no clean equipment swab needs to be taken. Clean equipment swabs will be taken before the equipment is put back into use. Swab testing tables updated.
3.9- Pest Management		6.10- Pest Management	Complete rewording formatting. Significant additional requirements (too many to highlight)
3.10- Zoning		6.11- Zoning	Rewording and formatting, Zoning classification moved to Appendix Significant changes to appendix.



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3.11- Pathogen Environmental Monitoring		6.8- Pathogen Environmental Monitoring	<p>Program shall include</p> <ul style="list-style-type: none"> • Verify the effectiveness of controls for preventing cross-contamination, including Sanitation, GMPs, preventive maintenance, and plant traffic controls. • Provide for periodic training of personnel responsible for PEM activities. <p>The PEM requirement focuses on two specific pathogens, Salmonella sp. and Listeria monocytogenes, as well as indicator organisms which predict their presence in the processing environment.</p> <p>Routine sampling must take place during production, at least 3-4 hours after start-up.</p> <p>Whenever product contact surfaces are tested for pathogens, affected product lots shall be placed on Hold pending the test results (see Section 5.1-Hold & Release). In the event of a pathogen positive result, Kraft contracting representative and Kraft Corporate Quality and Food Safety & Microbiology must be notified, even if the specific lot is not sent to Kraft Foods. The Supplier shall conduct an investigation to identify the potential source and document all corrective actions. They shall also verify the effectiveness of the corrective actions.</p> <p>The PEM program shall minimally be reviewed every 2 years or whenever a change occurs</p>	Requirements for critical pathogen testing moved to section 4.4
CHAPTER 4 - PRODUCTION PROCESS CONTROLS		CHAPTER 7 – PRODUCT REALIZATION		
4.1- Specification Compliance and Contract Review		7.1- Specification Compliance and Contract Review	<p>If a pathogen test is required for the COA based on Kraft Foods specifications, the test must be performed by a laboratory approved by Kraft Foods (see Section 2.6 – Testing Controls: Laboratory Requirements). The COA from the approved laboratory must be supplied to Kraft.</p> <p>COA requirements moved from Appendix, including additional requirements</p> <p>The Supplier shall notify the Kraft Foods receiving locations if a lot is split between two or more Kraft Foods locations.</p> <p>Certificate of Analysis should be written in local language (language used in the delivered Kraft Foods plant) or at least in English.</p>	Reference to Continuing Pure Food Guarantee removed and appendix deleted
4.2- Hazard Analysis AND Critical Control Points (HACCP)		7.7- Hazard Analysis Critical Control Points (HACCP)	<p>Rewording</p> <p>When producing goods for Kraft Foods, the performance objective of all processes/technologies used to reduce target pathogenic organisms must be defined. Data demonstrating effective processing (capable processing) must be made available to Kraft Foods, upon request. Further, Supplier program requirements must include on-going verification of effectiveness conducted at a minimum frequency of every two years.</p>	



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4.3- Incoming Materials: Supplier Quality Management		7.5- Incoming Raw Materials, Ingredients and Packaging: Supplier Quality Management	Rewording and appendix added	
4.4- Incoming Materials: Inspection and Testing		7.6- Incoming Raw Materials, Ingredients and Packaging: Inspection and Testing	ensure compliance to chemical contaminants (pesticides residues, mycotoxins, etc.) and GMO regulation locally and in the destination to which they may be delivered. Additional requirements when pathogen testing marked as critical	
4.5- Traceability	RESOURCE DOC SECTION M: Traceability	7.10- Traceability	Rewording and appendix added according to GS1 requirements Criteria for information request updated (4 hours to provide requested information)	
4.6- Allergen Management		7.3- Allergen Management	Rewording and formatting, in combination with corresponding appendix	
4.7- Extraneous Matter	SECTION O: Detection and control of extraneous matter	7.8- Extraneous Matter Management	Rewording and appendix added. Additional metal detection requirements.	
4.8- Rework Control		8.3- Rework Control	Rewording and formatting	
4.9- Label Control		7.4- Label Control	Rewording and formatting	
4.10- Weight Control		7.9- Weight Control	Rewording and formatting	
4.11- Storage and Transportation	RESOURCE DOC SECTION P: Storage and Transportation	7.11- Storage and transportation	Rewording and appendix added	
CHAPTER 5 - SPECIAL SITUATIONS				
5.1- Hold & Release		8.4- Hold & Release	Rewording and formatting Examples of category I and II holds included	
5.2- Product Retrieval		8.6- Product Retrieval	Rewording and formatting	
5.3- Control and Disposition of Non-conforming Products		8.5- Control and Disposition of Non-conforming Products		
CHAPTER 6 - PACKAGING EXPECTATIONS				
6.1 Introduction		Part 1 Section 1 Introduction Part 2. Section 1 Introduction	Inclusion of Declaration of Compliance Reference to Global Supplier HAACP doc HAACP manual has been updated to include all packaging references previously in pSQE	
6.2 Expectations regarding		Part 1 Section 1	Rewording and formatting	



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transfer of constituents from a food contact material to food		Introduction Part 2. Section 1 Introduction		
6.2.1. Packaging Hygiene			New section	
6.2.2 Constituents from plastic materials		Part 2. 1.1	Rewording and formatting	removal of reference to epoxy coatings
6.2.3 Constituents from cellulose fiber materials		Part 2. 1.2	Rewording and updated of references	
6.2.4 Metal in contact with packaging		Part 2. 1.3	Rewording and formatting	
6.2.5 Recycled post consumer material		Part 2. 1.4	Rewording and formatting	
6.2.6 Consumer acceptance		Part 2. 1.5	Rewording and formatting	
6.2.7 Odor and Taste transfer		Part 2. 1.7	Rewording and formatting	
6.2.8 Residual solvents		Part 2. 1.6	Rewording and update of references	
6.2.9 Printing inks		New section	New section	
6.2.10 Printing in direct contact with food		Part 2. 1.8	Rewording and formatting	
6.2.11 Packaging Material Ingredients and Processing Aids derived from Allergenic and Genetically Modified Sources		Part 2. 1.9	Rewording and formatting	
6.2.12 Active and intelligent packaging			New section	
6.3 Expectations regarding environmental impact of packaging		Part 2. 2	Rewording and formatting Inclusion of requirements for deliver of material concerning toxic substances	
6.3.1 Minimization of heavy metals, and other N-classified substances		Part 2. 2.1	Rewording and formatting	
6.3.2 Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)			New section	
6.4 Packaging Component Information Sheet (PCIS)		Part 2. 3	Rewording and formatting	
6.5 Reference list of regulations and methods		Part 2. 4	References updaetd	
APPENDIX 1: DEFINITIONS		APPENDIX 1: DEFINITIONS	Inclusion of additional definitions, mainly form Old pSQE	



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SQE RESOURCE SUPPLEMENT				
SECTION A: FOOD DEFENSE				
SECTION B: CORRECTIVE AND PREVENTIVE ACTIONS (C&PA)		APPENDIX 11: FOOD DEFENSE	Simplification including new references.	
SECTION C: GOOD MANUFACTURING PRACTICES (GMPs)			New - simplification of section in main SQE with creation of new appendix	
SECTION D: PATHOGENS INVOLVED WITH COMMUNICABLE DISEASE		APPENDIX 2: GMP	Some additional points	
SECTION E: PLANT STRUCTURE		APPENDIX 3: PATHOGENS INVOLVED WITH COMMUNICABLE DISEASE	Rewording and formatting	
SECTION F: UTILITIES		APPENDIX 5: PLANT STRUCTURE	Rewording and formatting	
SECTION G: EQUIPMENT DESIGN		APPENDIX 4: UTILITIES	Additional requirements for Utilities chemicals	
SECTION H: EQUIPMENT MAINTENANCE		APPENDIX 6: EQUIPMENT DESIGN	Rewording and formatting	Passivation removed
SECTION I: SANITATION			New - simplification of section in main SQE with creation of new appendix	
SECTION J: PEST MANAGEMENT		APPENDIX 8: SANITATION	Rewording and formatting Sanitation Verification (after wet cleaning) If the equipment is not in use, no clean equipment swab needs to be taken. Clean equipment swabs will be taken before the equipment is put back into use. Update of swab testing tables	
SECTION K: ZONING		APPENDIX 9: PEST MANAGEMENT	Rewording and formatting	
SECTION L: PATHOGEN ENVIRONMENTAL MONITORING (PEM)		APPENDIX 10: ZONING	Additional infrastructure requirement. • Are effluent-and wastewater drains coming from product areas with potentially higher contamination risk separated (i.e. no connection between drains in red and other areas or back-flow prevention installed) Production zones changed.. Non-manufacturing zone:/High risk zone: / Controlled zone: / High control zone: Examples of different areas added	



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SECTION M: TRACEABILITY		APPENDIX 7: PATHOGEN ENVIRONMENTAL MONITORING (PEM)	Rewording and formatting with corresponding section in SQE	Impression method no longer valid, table removed
SECTION N: ALLERGEN MANAGEMENT			New - simplification of section in main SQE with creation of new appendix	
SECTION O: DETECTION AND CONTROL OF EXTRANEIOUS MATTER		APPENDIX 12: ALLERGEN MANAGEMENT	Rewording and formatting.	
SECTION P: STORAGE AND TRANSPORTATION			New - simplification of section in main SQE with creation of new appendix Additional Requirements. Magnets shall be checked against established operating limits and cleaned on a scheduled basis and the results documented.	
SECTION A: FOOD DEFENSE			New - simplification of section in main SQE with creation of new appendix	
SECTION B: CORRECTIVE AND PREVENTIVE ACTIONS (C&PA)		APPENDIX 11: FOOD DEFENSE	Simplification including new references.	