1. Purpose

The purpose of the documents is to define the requirements for food safety management systems, HACCP based programs, and manufacturing practices for food suppliers.

2. Scope

State the intended scope of the document. The following should be defined:

- Region: Global
- Product type: Food, Beverage, Consumer Packaged Goods
- Brand: Starbucks, SBC, Tazo, Teavana, La Boulange
- GQFS&R groups the document is applicable to Product QA

3. Terms and Definitions

Term	Definition
HACCP	Hazard Analysis Critical Control Point
FDA	Food and Drug Administration
USDA	United States Department of Agriculture
QMS	Quality Monitoring Scheme
LEMP	Listeria Environmental Monitoring Program

4. Roles and Responsibilities

Role	Responsibility
Supplier	Ensure manufacturing site conformance to the Starbucks standards for Food Suppliers
Quality SME	Assess and verify supplier conformance to the requirements in this document

5. References / Attachments

Document Number	Document Title
Attachment 1	Standards for Food Suppliers
Attachment 2	Grower-Level Food Safety for Fresh Produce

6. Revision History

Revision	Description of Changes
1	Initial Registration in Intelex System. Previous revisions in legacy system. Updates: Guidelines were updated to include LEMP expectations for High Risk Food Assemblers.

Attachment 1, Standards for Food Suppliers

Starbucks
Standards for Food Suppliers

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 for Starbucks Company; and to ensure that suppliers consistently deliver products which are safe and legally compliant with all applicable codes and regulations (locally, and in countries where the products are intended to be commercialized), and conform to agreed quality specifications.

Independent 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 a written variance grant from a Starbucks Coffee Company officer (Vice President Level or higher). Request and response to request shall be documented.

Starbucks recognizes all GFSI-benchmarked standards and associated certifications and will consider that food suppliers holding a valid GFSI-benchmarked certificate from an accredited certification body, relevant to the business engaged with Starbucks, meet Starbucks food safety and quality minimum expectations.

Compliance assessment:

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.

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

For food suppliers which 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 the Starbucks audit, but those assessments will be more heavily 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; the supplier certification scheme; grade/level and service provider; & the performance history with Starbucks.

Starbucks and its service providers shall have access to any facility, warehouse, plant, or site where the Products, or any ingredients or components that are used to manufacture and produce the Products, are manufactured, grown, processed, converted, and/or stored to inspect

and audit the Products and the activities being performed by Seller, and to ensure Seller's compliance with this Agreement. Seller shall provide such information requested by Starbucks or its service provider in connection with any audit, inspection, or assessment of Seller, its Affiliates, suppliers, subcontractors, service providers, and representatives and their compliance with this Agreement. Seller will cooperate with these inspections. Seller shall cause all of its Affiliates, suppliers, subcontractors, service providers, and representatives to comply and cooperate with any audit or inspection conducted by Starbucks or its service provider. Seller will implement any reasonable corrective action requested by Starbucks resulting from any inspection. (Ref: Starbucks Standard Terms and Conditions)

Production facilities may be audited by a third party auditor appointed by Starbucks. The audit will assess the Supplier's compliance with Starbucks Food Standards. The Supplier shall bear the cost and expense related to such audit. (Ref: Starbucks Requirements)

These Starbucks Standards for Food Suppliers are subject to the definitive master purchase agreement between the supplier and Starbucks or, if not definitive agreement is in effect, Starbucks Standard Terms and Conditions of Purchase, which are accessible at http://www.starbucks.com/business/suppliers/standardtermsandconditions ("Agreement").

Without limiting the generality of the terms in the Agreement, the supplier acknowledges and agrees that the following acts or omissions shall constitute a material breach of the Agreement:

1. Failure to implement a HACCP program that is reasonably satisfactory to Starbucks.

2. The supplier's refusal to grant Starbucks access to the supplier's facilities to conduct audits.

3. The reckless or grossly negligent handling of food products by the supplier, its employees, agents, and/or contractors.

4. Willful or intentional misconduct by the supplier, its employees, agents, and/or contractors.

5. The suspension, cancellation, or revocation of necessary registrations, permits or licenses in order for the supplier to handle, store, manufacture, and produce food products.

6. Failure to notify Starbucks that the supplier has been or is subject to an inspection or investigation by FDA, USDA, or local health department.

7. Failure to notify Starbucks of (i) any food safety incident or activity at a facility where Starbucks' products are handled, stored, manufactured, or produced, or (ii) any detection or discovery of product adulteration, including, but not limited to foreign material, pathogenic bacteria, undisclosed allergens or ingredients. Failure to notify Starbucks in advance of a Public Press Release impacting Starbucks products.

8. Failure to notify Starbucks of any material and adverse findings by the supplier's third party auditor with respect to the sanitation and safety of any facility where Starbucks' products are handled, stored, manufactured, or produced.

9. Failure to undertake remedial measures as mutually agreed upon in a written corrective action plan.

1 Management System and Commitment

The supplier shall have a Food Safety Management System which 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

1.1.1 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. In addition, high Risk, ready to eat (RTE) suppliers shall have a policy for LEMP which can either be a standalone document or may be incorporated into assembler's food safety standard.
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.

1.1.2 The food safety policy shall be associated to clear objectives, targets and measures of success which are monitored and reported at a defined frequency.

1.2 Food safety and quality manual and document

1.2.1 The supplier shall have a Food Safety Manual and/or documented Quality Management System. The scope should be appropriate to the range of business activities covered, including documented procedures to related process steps.

1.2.2 The Food Safety Manual and/or documented Quality Management System shall be fully implemented and the manual or relevant components shall be readily available to key staff.

1.3 Document Control and Record Retention

1.3.1 The company shall have a procedure to manage documents which are part of the food safety and quality system. This shall include:

- The method for the identification and authorization of controlled documents
- A record of the reason for any changes or amendments to documents
- A system for the replacement of existing documents after an update is made; documents shall be reviewed and approved by designated and trained personnel

1.3.2 All procedures and work instructions shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate staff. This shall include the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (if, for example, there are issues of literacy or foreign language). Documents shall be available and current at all locations where they are needed to support the effective execution of operations.

1.3.3 Records shall be permanent, genuine, readily available and complete.

1.3.4 All records (processes and products) and test reports shall be retained for a period of at least 12 months beyond the unopened shelf life of the product or in compliance with regulatory requirements (whichever is longer).

1.3.5 The company shall store records in a manner which protects against damage, loss or environmental disasters.

1.4 Management responsibility

1.4.1 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.

1.4.2 Absence coverage shall be clearly identified for all positions relevant to food safety and quality.

1.4.3 The designated leader for food safety and quality shall be independent and report to a manager whose objectives encompass food safety and quality.

1.5 Management commitment and resource management

1.5.1 The supplier's senior management shall provide evidence of their commitment to establish, implement, maintain and improve the food safety system, this includes LEMP for high-risk RTE suppliers. Key evidence that demonstrates commitment includes but is not limited to:

- Determining and providing, in a timely manner, all the resources, human and financial, needed to implement, maintain and continuously improve the food safety system

- Engagement of key food safety and quality personnel in prioritization of capital expenditures
- Senior management with food safety knowledge and involvement into relevant food safety activities

1.5.2 Senior management shall regularly be trained to food safety and quality management relevant topics. Schedules and records shall be available to demonstrate attendance.

1.6 Management review

1.6.1 The supplier's senior management shall review the verification of the food safety system, HACCP Plan or HACCP based plans, and LEMP (only applicable to high risk, RTE suppliers) at planned intervals, but at a minimum annual frequency, 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.

1.6.2 Monitored measures and results associated with the food safety policy and its objectives shall be reported to the supplier's senior management on at least on a quarterly basis and shall lead to timely, documented actions, when necessary, as well as verification activities to ensure those actions were effective and that issues have been resolved.

1.6.3 The company shall have a demonstrable meeting program which enables food safety, legality and quality issues to be brought to the attention of senior management at least monthly and allows for the resolution of issues requiring immediate action.

1.7 Internal and external audit

1.7.1 Internal audits shall be scheduled and carried out on a frequent basis, covering the entire facility and all aspects of the quality management system, prerequisite programs, HACCP plan, and if applicable, LEMP.
The scope and frequency of the audits shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least annually.

1.7.2 In addition to the internal audit program, there shall be a program of documented inspections to ensure that the factory environment and processing equipment is maintained in a suitable condition for food production. The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas. Inspections shall include:

- Hygiene inspections to assess cleaning, personnel and housekeeping performance

- Facility inspections to identify risks to product from the building or equipment

1.7.3 All internal auditors shall be trained in audit techniques and independent of the audit area.

1.7.4 An external, 3rd party food safety inspection shall be conducted on an annual basis.

1.7.5 Results of internal and external audit shall be documented.

1.7.6 Corrective and preventive actions planning and implementation should begin immediately upon the receipt of internal and external audit results. Evidence must show them to be effective and shall be implemented within the permitted timeframe provided by the auditor or certification body and compliant to the requirements in the *Corrective and preventative action* section of this standard.

1.8 Product complaint handling

1.8.1 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 effectively by appropriately trained staff.

1.8.2 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.

1.9 Corrective and preventive action

1.9.1 The company shall be able to demonstrate that they use the information from identified failures in the food safety and quality management system to take necessary actions and prevent recurrence.
The company shall have a documented procedure for handling non-conformances identified within the scope of their quality management system.
High risk RTE food assemblers shall have a documented plan in place and detail corrective actions for *Listeria* spp. and/or *Listeria monocytogenes* positives. For positives found in zone 1 the plan shall require the destruction of contaminated product.
Responses to *Listeria* spp. positives for zones 1 to 4 at high-risk RTE assembler facilities:

- Immediate actions shall be taken upon finding Listeria spp. including cleaning and sanitation.
- Sanitation, GMP and maintenance records shall be examined by the LEMP team as part of the Investigation.
- Sampling frequencies shall be increased, until achieving a minimum of 3 consecutive negative swab results.
- LEMP team shall review sanitary design(s) of equipment(s), process flow and history of sampling results for reoccurring positive(s).

- The facility shall document the destruction of contaminated products (Zone 1 only).
- Investigational re-samplings (including vectoring) shall be performed in response to Listeria positive(s).
- Swabs from investigational sampling shall not be composited.
- The LEMP team shall examine historical results from the affected site to analyze trends and patterns to identify the root cause of Listeria spp. positive(s).

1.9.2 Actions shall be clear, assigned to suitably competent and authorized persons, able to address the immediate issue and have the ability to prevent recurrence sustainably.

1.9.3 Action completion timelines should reflect prioritization based on food safety and quality risks identified.

1.9.4 A documented verification shall be in place to ensure that actions are implemented and are effective.

1.10 Traceability

1.10.1 The company shall be able to trace all raw material product lots (including packaging) from their supplier through all stages of processing and distribution to their customer and vice versa.

1.10.2 Identification of raw materials, including primary and any other relevant packaging and processing aids, work-in-process/semi-processed products, partially-used materials, finished products and material pending investigation, shall be adequate to ensure traceability. Lots shall be clearly defined.

1.10.3 The company shall test the traceability system across the range of product groups to ensure traceability. This shall occur at a predetermined frequency and results shall be retained for inspection. The test shall take place at least annually. Key components required for each of these exercise scenarios include:

- Quantity check or mass balance
- Rework or carryover performed
- Waste, including that which is diverted for animal feed

1.10.4 This traceability exercise should be achievable within 4 hours and identify 98 - 102 % of product. Traceability exercises should include the following scenarios, at minimum:

- Forward trace and backward trace from packaging to finished product (accounting for distribution into Starbucks' network)
- Forward trace and backward trace from raw material to finished product (accounting for distribution into Starbucks' network)

1.10.5 When recovery exceeds 4 hours or falls outside of 98 - 102%, root cause analysis shall be performed and preventive actions identified and completed.

1.11 Control of nonconforming product

1.11.1 The company shall ensure that any out-of-specification product is effectively identified, and quarantined to prevent accidental release. A method for reconciliation of quantities quarantined shall be in place and procedures should exist to control the disposition of quarantined product.

1.11.2 The company shall ensure that responsibilities are clearly defined for decision making on the use or disposal of products appropriate to the issue (for example, destruction, reworking, downgrading to an alternative label or acceptance by concession).

1.11.3 Decisions and associated actions are recorded.

1.12 Management of incidents, product withdrawal and product recall

1.12.1 The company shall have documented procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality. This shall include consideration of contingency plans to maintain business continuity. Incidents may include:

- Disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications
- Events such as fire, flood or natural disaster
- Malicious contamination or sabotage

1.12.2 Where products which have been released from the site may be affected by an incident, consideration shall be given to the need to withdraw or recall products. In the event of a recall impacting Starbucks product, Starbucks will be notified immediately of the decision to issue a recall.

1.12.3 The company shall have a documented 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
- Guidance for evaluation of product disposition in the event of a facility shutdown or production disruption
- Contingency plans for order fulfillment in the event that production is disrupted
- An up-to-date list of key contacts or reference to the location of such a list; for example, recall management teams, emergency services, suppliers, customers, certification bodies, and regulatory authorities
- 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 (for example, specialist laboratories, regulatory authority and legal expertise)

1.12.4 Procedure shall be capable of being operated at any time.

1.12.5 Tests shall be performed at least annually of the product recall and withdrawal procedures to ensure their effective execution. Results of the test shall be:

- retained
- include timings of key activities
- be used (along with results from actual recalls) to review the procedure and implement improvements as necessary

1.13 Food defense

1.13.1 A food security/food defense program shall be in place to protect food products from intentional adulteration (microbiological, chemical, physical or other) and includes physical, personal and operational security measures.

1.13.2 All staff shall be trained in food defense and site security procedures annually. Staff must be trained to report unidentified or unknown visitors.

1.13.3 The facility shall conduct an annual vulnerability assessment. Results shall be documented and corrective actions should comply with the Preventive and Corrective Actions Policy.

1.13.4 Measures shall be in place to ensure only authorized personnel have access to computer systems, production and storage areas. Access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be in place.

1.13.5 Where required by legislation, the site shall be registered with, or be approved by, the appropriate authority.

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

2.1.1 All relevant personnel, including temporary staff and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.

2.1.2 Training requirements relevant to employee roles or job responsibilities shall be developed with minimum frequencies for refresher training.

2.1.3 Records of all training shall be available. This shall include, as a minimum:

- The name(s) of the trainee(s) and confirmation of attendance
- The date and duration of the training
- The title or course contents, as appropriate
- The training provider

2.1.4 Where training is undertaken by agencies on behalf of the company, records of the training shall be available.

2.1.5 The company shall routinely review the competencies of its staff. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job training.

2.1.6 Where personnel are engaged in activities relating to HACCP, relevant training and competency assessments shall be in place.

2.1.7 Activities shall be taken and documented to demonstrate the effectiveness of the training.

2.2 Personal Hygiene

2.2.1 The requirements for personal hygiene shall be documented, adequately communicated to all personnel and enforced at all times.

- Watches shall not be worn
- Jewelry shall not be worn, with the exception of a plain wedding ring (i.e. no stones) or wedding wristband; in the event of such exception, the ring or wristband shall be completely covered; medical alert bracelets and necklaces may be worn with written notice to personnel resources
- 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 worn
- Excessive perfume or aftershave shall not be worn

2.2.2 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.

2.2.3 Hand washing areas shall be provided at location appropriate to facilitate good hand washing practices. The hand washing facilities shall provide, as a minimum:

- Sufficient quantity of water at an appropriate temperature
- Soap
- Hands-free single-use towels or suitably designed, maintained and placed air driers
- Hands-free sinks
- Hand washing instructions

2.2.4 All cuts, open wounds or lesions on exposed skin shall be covered by an appropriately colored bandage that is distinct from the product color and contains a metal detectable strip; these shall be company- issued and monitored. Where appropriate, in addition to the bandage, a glove shall be worn.

2.2.5 Where metal detection equipment is used, a sample from each lot of bandages shall be successfully tested and detected through the equipment; records shall be kept.

2.2.6 Personal medication shall not be allowed within production areas. 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

2.3.1 The company shall have a procedure which requires notification by employees, temporary employees, visitors and contractors of any relevant infection, disease or condition with which they may have been in contact or be suffering from. Individuals suffering from conditions which may have a negative impact on food safety will not be allowed in food manufacturing areas.

2.3.2 Where there may be a risk to product safety, visitors and contractors shall be required to confirm that they are not suffering from a condition which may put product safety at risk, prior to entering the raw material, preparation, processing, packaging and storage areas.

2.3.3 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

2.4.1 The company shall document and communicate to all employees, contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (for example, high-care or low-risk areas). This shall also include policies relating to the wearing of protective clothing away from the production environment (for example, removal before entering toilets, use of canteen and smoking areas).

2.4.2 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)

2.4.3 Scalp and facial hair shall be fully contained to prevent product contamination in food handling areas.

2.4.4 Laundering of protective clothing shall take place by an approved contractor or in-house laundry using a validated process.

2.4.5 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, be intact and not shed loose fibers.

3 Facility and Equipment Control

3.1 External facility standards

3.1.1 The facility 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.

3.1.2 The facility site shall have all appropriate registrations and/or certifications to conduct business and manufacture food product.

3.1.3 External grounds shall be maintained in a clean and orderly manner and shall conform to the requirements in the *Pest Control* section of this Standard.

3.1.4 Drainage shall be adequate to prevent ingress of water or other contaminants into the facility.

3.1.5 Waste treatment and disposal must be adequate and maintained so they do not constitute a source of contamination in areas where food is exposed and shall conform to the requirements in the *Waste/Waste Disposal* section of this Standard.

3.2 Layout, product flow and segregation

3.2.1 The product flow from receiving to shipping shall be arranged to prevent product contamination.

3.2.2 The premises shall allow sufficient working space and storage to enable all operations to be carried out under hygienic conditions.

3.2.3 Physical barriers or effective procedures shall be in place between high- and low-risk operations to minimize the risk of product contamination.

3.2.4 Segregation shall take into account the flow of product, nature of materials, equipment, personnel, airflow and services.

3.2.5 The flow of waste shall be organized to minimize product contamination.

3.2.6 There shall be a site plan which designates areas where product is at different levels of risk from contamination; that is:

- Enclosed product areas
- Low-risk areas (contain only components/foods which are shelf stable and do not normally support the growth of pathogens)
- High-care areas (contain only components/foods which have undergone a process to reduce any microbiological contamination; components/foods are considered ready-to-eat and require temperature limits to control pathogen growth)
- High-risk areas (contain only components/foods which have undergone a cook or similar process to achieve a six log reduction for *Listeria*; components/foods are considered ready-to-eat and require temperature limits to control pathogen growth)

3.2.7 The site plan shall define:

- Access points for personnel and travel routes
- Location of staff facilities and routes to the facilities from places of work
- Production process flow (including raw materials and packaging)
- Routes for the removal of waste
- Routes for the movement of rework

If it is necessary to allow access across production areas, designated walkways shall be provided which ensure there is adequate segregation from materials. All production areas shall be designed and positioned, where possible, so that movement of personnel is through simple, logical routes. The movement of waste and rework shall not compromise the safety of products.

3.2.8 In low-risk areas, the process flow, together with the use of demonstrably effective procedures, shall be in place to minimize the risk of the contamination of raw materials, work-in-process products, packaging and finished products.

3.2.9 Where high-care areas are part of the manufacturing site, there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials, equipment, personnel, waste, airflow, air quality and utilities provision. Where physical barriers are not in place, the site shall have undertaken a full evaluation of the risks of cross-contamination, and alternative effective processes shall be in place to protect products from contamination.

3.2.10 Where high-risk areas are part of the manufacturing site, there shall be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, nature of materials, equipment, personnel, waste, airflow, air quality and utilities provision. The location of transfer points shall not compromise the segregation between high-risk areas and other areas of the factory. Practices shall be in place to minimize risk of product contamination.

3.2.11 Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly, under safe hygienic conditions.

3.2.12 Temporary structures constructed during building work or refurbishment, etc., shall be designed and located to avoid pest harborage, and ensure the safety and quality of products.

3.3 Building infrastructure

3.3.1 The construction of the site, buildings and structure shall be suitable for the intended purpose.

3.3.2 Walls shall be constructed, finished and maintained to prevent the accumulation of dirt, minimize condensation and mold growth, and facilitate cleaning.

3.3.3 Wall/floor junctions shall be designed and maintained to facilitate cleaning. Floors shall be suitable for the intended use, and withstand cleaning materials and methods. They shall be impervious and maintained in good repair.

3.3.4 Drainage shall be located and designed to minimize risk to product safety and enable effective cleaning. Drains shall flow away from high-risk and high-care areas.

3.3.5 All water systems must be protected against backflow. Backflow prevention devices shall be installed on all water and steam lines in the processing facility and tested annually.

3.3.6 All conduit or pipes used for the transport of food or raw materials shall be designed to facilitate free flow and prevent product accumulation (for example, within dead ends, cracks and crevices).

3.3.7 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.

3.3.8 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.

3.3.9 Where there is a risk to product, windows and rooftop ventilation shall be adequately screened and covered to prevent the ingress of pests and any contamination from outside.

3.3.10 Doors shall be maintained in good condition. External doors and dock levelers shall be close-fitting or adequately sealed to prevent the ingress of environmental concerns or pests.

3.3.11 Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning.

3.3.12 Bulbs and strip lights shall be protected in product handling areas. Where full protection cannot be provided, alternative management such as wire screens or monitoring procedures shall be in place.

3.3.13 Adequate ventilation and remediation shall be provided in product storage and processing environments to control condensation or excessive dust.

3.3.14 Location of exposed ventilation, heating and cooling equipment shall facilitate cleaning and maintenance and shall not pose a risk to food safety.

3.3.15 Screened or filtered air and positive pressure systems shall be in place in high-risk and high-care areas and adequately maintained.

3.4 Utilities – water, ice, air and other gases

3.4.1 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, and pose no risk of contamination, according to applicable legislation. The microbiological and chemical quality of water shall be analyzed at least annually.

3.4.2 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.

3.4.3 Air, other gases and steam used directly in contact with or as an ingredient in products and food contact surfaces shall be monitored to ensure this does not represent a contamination risk. Compressed air used directly in contact with the product shall be filtered and tested for chemical and biological contaminants annually.

3.5 Equipment

3.5.1 All food processing equipment shall be suitable for the intended purpose, shall be constructed of appropriate materials and not pose a risk to food quality or safety.

3.5.2 The design and placement of equipment shall ensure it can be effectively cleaned and maintained.

3.5.3 Equipment or structures in direct contact with food or over food shall pose no risk to food quality or safety and meet legal requirements, where applicable.

3.6 Maintenance

3.6.1 All equipment shall be adequately maintained, serviced and operated to produce safe products.

3.6.2 A documented system of planned maintenance shall be in place covering all items of equipment which are critical to product safety and quality.

3.6.3 In case of issues, technical support shall be immediately available (for example, a minimum of one maintenance employee on site during production).

3.6.4 Maintenance and construction activities 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.

3.6.5 Tools used in high-risk and high-care areas shall be dedicated to that area or shall be decontaminated upon entry to the area.

3.6.6 The site shall maintain a spare parts library or ensure that spare parts can be obtained in a timely manner for all equipment which is critical to product safety.

3.6.7 Maintenance work shall be followed by a hygiene clearance procedure that ensures that product contamination hazards have been removed from machinery and equipment. Upon completion of any maintenance work, machinery and equipment shall be clean and free from contamination hazards.

3.6.8 A system shall be in place to ensure that all parts removed and all tools used during maintenance are accounted for, following completion of maintenance activities.

3.6.9 Lubricating oil and paints shall be suitable for the intended use (food grade, where applicable).
Chemicals used for maintenance activities shall conform to the requirements in the *Chemical contaminant control* section of this standard.

3.6.10 In addition to any planned maintenance program, where there is a risk of product contamination by foreign bodies arising from equipment damage, the equipment shall be inspected at predetermined intervals, inspection results documented and appropriate action taken.

3.6.11 Where temporary repairs are made, processes and materials shall be controlled to ensure the safety or legality of product is not jeopardized (for example, no tape, cardboard, string, etc.). All temporary repairs shall indicate a date and the initials of the individual making the temporary repair for follow-up at a later time. These temporary measures shall be permanently repaired as soon as practical, and within a defined timeline.

3.6.12 Inoperable, defective or inaccurate equipment shall be documented in a maintenance log and tagged (segregated, when possible) to avoid accidental use.

3.6.13 Engineering workshops shall be kept clean and tidy and controls shall be in place to prevent contamination risks to the product. Equipment and storage areas shall be elevated up from the floor to facilitate inspection and cleaning.

3.7 Staff facilities

3.7.1 Personal items shall be stored separately from uniforms within the changing areas. Accommodations shall be available to separate clean and dirty uniforms (where applicable).

3.7.2 Toilets shall be segregated and shall not open directly into food preparation, handling or storage areas.

3.7.3 All changing rooms shall be adequately equipped and maintained to minimize the risk of food contamination.

3.7.4 Where provided, in-house catering facilities shall be controlled to prevent contamination of products and covered within internal audits.

3.7.5 Where an operation includes a high-risk or high-care 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 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 and/or high-risk area
- An effective system shall be provided to segregate areas for wearing high-care and/or high-risk footwear from other footwear (for example, a barrier or bench system) or there shall be an effective boot wash on entrance to the high-care and/or high-risk area
- Protective clothing shall be visually distinctive from that worn in lower risk areas and shall not be worn outside of the high-care and/or high-risk area
- Hand-washing during the changing procedure shall be incorporated to prevent contamination of the clean protective clothing
- Upon entry to high-care and/or high-risk areas, hand-washing and disinfection shall be provided

3.7.6 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 smoke removal systems to the exterior of the building.

3.7.7 All personal food brought into manufacturing premises by staff shall be appropriately stored in a clean and hygienic state. No personal food shall be taken into storage, processing or production areas. When designated outdoor

eating areas are permitted, the area shall be of suitable location and condition, with appropriate control of waste.

3.8 Storage Facilities

3.8.1 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. All items shall be raised from the floor, covered and away from the walls. Temperature control shall conform to the requirements in the *Temperature control* section of this Standard.

3.8.2 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 occurs during these operations.

3.8.3 Segregation shall be in place with regards to allergens, and raw versus cooked products. When vertical shelving or racks are used, product shall be protected from overhead allergen, microbiological, chemical and physical contamination sources.

3.8.4 Based on applicable legislation, claims and customer requirements, segregation may be in place with regards to religion-related programs (for example, Kosher or Halal), dietary preference (vegetarian/non-vegetarian), GMO/Non-GMO, and allergens.

3.8.5 Receipt documents, product identification and facility design shall facilitate correct stock rotation of raw materials, work-in-process products and finished products in storage. Materials shall be depleted in the correct order relative to their manufacturing date or expiration date and within the prescribed shelf life.

3.8.6 Where the company employs third party contractors, all the requirements specified in this section shall be clearly defined in the contract and verified, or the contracted company shall be certificated to the GFSI Standard for Storage and Distribution or a similar internationally-recognized Standard.

3.9 Dispatch and Transport

3.9.1 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 shipping
- 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

- Compliance to Frozen and Refrigerated Cold Chain Standards for Suppliers

3.9.2 All vehicles used for the transports of raw materials, including packaging, and finished goods, shall be suitable, hygienic, in good repair and free of visible infestation; inspections shall be complete and records are available to demonstrate on-going compliance

3.9.3 Traceability shall be ensured during transportation. There shall be a clear record of shipping and receipt of goods and materials demonstrating that sufficient checks have been completed during the transfer of goods.

3.9.4 Where the company employs third-party contractors, all the requirements specified in this section shall be clearly defined in the contract and verified or the contracted company shall be certified to a Global Food Safety Initiative benchmark for Storage and Distribution or similar internationally-recognized standard.

4 Environmental control

4.1 Cleaning and Sanitation

4.1.1 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.

4.1.2 Documented cleaning procedures shall be in place and maintained for the building, plant and all equipment. Cleaning procedures shall, as a minimum, describe:

- Personnel responsible for cleaning activities
- 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
- Frequencies and methods for cleaning based upon risk

4.1.3 The effectiveness of the cleaning procedures and practices shall be clearly defined based on potential hazards (limits of acceptable and unacceptable microbiological and allergen levels), verified through post-sanitation visual hygiene audits and swabbing programs (ATP bioluminescence techniques, microbiological testing, allergen protein-specific swabs or chemical testing, as appropriate) and documented. Records shall be used to identify trends in cleaning performance and instigate improvements where required.

4.1.4 All chemicals shall be applied according to prescribed directions and verified for adequacy (concentration, quantities and application) regularly.

4.1.5 Cleaning equipment shall be fit for purpose, suitably identified for intended use (for example, color-coded or labeled), cleaned, sanitized and stored in a hygienic manner to prevent contamination.
There shall be a maintenance program for sanitation equipment to ensure good working condition of all sanitation equipment and utensils. The maintenance program shall conform to the *Maintenance* section of this Standard.

4.1.6 Equipment used for cleaning in high-care and high-risk areas shall be dedicated for use in that area.

4.1.7 Dry cleaning techniques (vacuum cleaning or squeegees) shall be used during in-production cleaning to minimize the risk of cross-contamination through aerosols.

4.1.8 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.

4.1.9 The resources for undertaking cleaning shall be available. Where it is necessary to dismantle equipment for cleaning purposes or to enter large equipment for cleaning, this shall be appropriately scheduled and, where necessary, planned for non-production periods. Cleaning staff shall be adequately trained or engineering support provided where access within equipment is required for cleaning.

4.1.10 Clean-in-place (CIP) equipment, where used, must be accounted for in the sanitation program.

4.2 Waste/Waste Disposal

4.2.1 Waste and waste containers shall be managed, identified, collected, removed and disposed of in a manner which prevents contamination of products and production areas.

4.2.2 Waste management and removal services shall be contracted by an approved service provider. Labeled materials, products, or printed packaging designated as waste shall be disposed in a manner to ensure trademarks cannot be reused.

Waste disposal shall be managed in accordance with applicable legal requirements.

4.3 Pest Control

4.3.1 The company shall either contract the services of a licensed pest control organization, or shall have a certified pest control operator on 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.

4.3.2 Qualified pest control activities shall be conducted on at least a monthly basis.

4.3.3 Toxic bait is prohibited for use in the building interior. Any toxic bait stored on the premises must be stored securely, with access to designated individuals only and tracked with an inventory control log.

4.3.4 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, including quantities and locations applied
- Trend analysis, recommendations and actions taken to prevent reoccurrence
- Electric insect light devices and/or pheromone traps shall be correctly located and operational; electric insect electrocuting devices may not be located in processing areas, storage areas or passages used for movement of food, packaging material, processing equipment or tools

4.3.5 In the event of infestation, or evidence of pest activity, action shall be taken to eliminate the hazard based on predetermined actionable limits. Any potentially affected products should be quarantined in a manner that adequately protects unaffected product, and subject to the nonconforming product procedure. All

actions shall be clearly documented, signed and dated by the individual performing the work.

4.3.6 An in-depth, documented pest control verification shall be undertaken at a frequency based on risk, but, at minimum, quarterly, by a pest control expert and supplier representative to review the pest control measures in place.

4.4 Environmental Monitoring

4.4.1 Environmental Monitoring for all Commodities (High Risk RTE Food Assemblers are exempt from these expectations, instead they must meet environmental monitoring requirements from 4.4.2)

4.4.1.1 Documented environmental monitoring procedures shall be in place and maintained for plants and all equipment. Procedures shall, as a minimum include:

- Facility map designating processing areas and denoting levels of product risk; a distinction between monitoring practices for food contact surfaces and above, areas/equipment adjacent to food contact surfaces within processing areas and non-food contact surfaces outside of processing areas must be maintained
- Applicable pathogens or indicator organisms to test
- Number of samples to be taken and a schedule that clearly identifies the frequency of sampling in all locations; maps and location descriptions must clearly describe the sites to be sampled
- Baseline limits
- Corrective action plans for positive swabs or when limits are exceeded
- Responsible individuals and method of sampling and testing; if using an external laboratory, they must be accredited
- Test methods (selection should be from official or industry-recognized methods)
- Monitored risks through this program dually considered within the facility's HACCP plan

4.4.1.2 Facility shall not test for pathogenic organisms in food contact zones without Starbucks knowledge.

4.4.2 Listeria Environmental Monitoring Program (LEMP) Expectations for High Risk Ready to Eat (RTE) Food Suppliers.

4.4.2.1 There shall be a trained, cross functional LEMP team with clearly defined roles and responsibilities. This team is responsible for reviewing and updating LEMP on a predetermined frequency.

4.4.2.2 The facility shall use Listeria spp. as an indicator for increasing the likelihood of finding Listeria monocytogenes niches

4.4.2.3 Environmental monitoring plans shall be in place and include the following:

- Sampling sites, broken down by zones (1 through 4) shall be clearly defined
- There shall be a facility map designating processing areas and denoting levels of product risk; a distinction between monitoring practices for food contact surfaces and above, areas/equipment adjacent to food contact surfaces, non-food contact surfaces within processing areas and non-food contact surfaces outside of processing areas must be maintained. The map shall indicate the location of all positive samples sites.
- Sampling sites shall be sampled in rotation to cover the zones in a specified timeframe and be performed across all times and shifts of the production on a rotating schedule.
- Operational sampling of zones shall occur at a minimum designated time, after the onset of production. When equipment cannot be accessed for operational sampling, they shall be performed at the end of production or prior to cleaning or when the equipment is idle.
- After swabbing Zone 1 surfaces(s) or collecting food samples for *Listeria* spp., including *L. monocytogenes* testing, the food processing line(s) shall be cleaned and sanitized prior to beginning production of new batch.
- Procedures shall include information as applicable to prevent cross-contamination of samples

4.4.2.4 The facility shall have procedures for collecting and handling samples that defines the following:

- Samples shall be taken by trained and designated individual(s)
- When possible, swabs shall be taken from cleanest (Zones 1 and 2) to dirtiest (Zones 3 or 4) area [Please refer to GMA guidance document “Listeria monocytogenes Guidance on Environmental Monitoring and Corrective Actions in At-risk Foods” for definition of zones].
- Minimum sampling area shall be defined for large surfaces. Example - 12 * 12 inches.

- For small or irregularly shaped areas, the entire surface area shall be sampled.
- Sample swabs shall be held refrigerated and tested within 24 hours. If sample swabs are routinely held at refrigeration temperatures for longer than 24 hours, evidence of validation that this practice will not affect results should be in place.
- Under exceptional circumstances, swabs may be held refrigerated and tested within 48 hours of sampling. Exceptional circumstances include swabs taken in a weekend/holiday.
- The facility shall be compliant with sampling guidelines from US FDA or USDA or any equivalent international regulatory agency depending on the jurisdiction.

4.4.2.5 Swab results shall be reviewed by a designated individual upon receiving data from the lab.

- While testing zone 1 or foods for *Listeria* spp. or *L monocytogenes*, Starbucks products associated with that line(s) shall be released only upon receiving confirmation of negative results.
- Positive results shall be handled in accordance with the *Non-conforming product* section of this standard. Starbucks QA shall be notified immediately upon receiving positive results for *Listeria* spp. on zone 1 surface(s) or in Starbucks products. Decisions and associated actions shall be documented and communicated to the Starbucks QA team.

4.4.2.6 Special Circumstances (Planned/Unplanned Events)

Facility shall have clearly defined procedures to be followed in response to planned or unplanned events. Special circumstances include construction, water leaks, natural disasters, major equipment breakdown, equipment installation, etc.

- The sampling frequency, site and number of swabs shall be altered in response to planned or unplanned event(s).
- The LEMP team shall review the situation and decide if it is appropriate to revert to routine sampling.
- All corrective actions (as per normal protocol) shall be followed in response to *Listeria* positive(s).

5 Supply control

5.1 Supplier approval and performance monitoring

5.1.1 The supplier shall have a documented supplier approval program and ongoing monitoring procedures to ensure that suppliers are manufacturing products under hygienic conditions, effectively manage risks to raw material quality and safety,

and are operating effective traceability processes. The approval and monitoring procedure shall be based on one, or a combination of, the following:

- Supplier audits
- Third party audits or certification (for example, GFSI-certified schemes)
- Supplier questionnaires

5.1.2 The procedures shall define how exceptions are handled (for example, where products are purchased from agents and direct audit or monitoring has not been undertaken, or where production schedules necessitate a truncated approval process).

5.1.3 The supplier shall be able to demonstrate that materials are only purchased from approved sources.

5.1.4 All suppliers and service providers shall be periodically reassessed. The frequency of this reassessment shall be based on a risk assessment of the supplier or materials supplied.

5.1.5 Where approval is based on questionnaires, these shall be reissued at a minimum frequency of every three years and suppliers will be required to notify the site of any significant changes in the interim.

5.1.6 Consideration shall also be given to the significance of a raw material on the quality of the final product. The risk assessment shall form the basis for the raw material acceptance and testing procedure, and for the processes adopted for supplier approval and monitoring.

5.1.7 In the event that supplier monitoring activities identify deficiencies, relevant actions shall be defined, implemented, verified for their effectiveness and documented.

5.1.8 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.

5.1.9 Contracts or formal agreements shall exist with the service provider which clearly define service expectations and ensure potential food safety risks associated with the service have been addressed. Service providers shall conform to the *Personnel* section of this Standard.

5.2 Raw material and packaging specifications

5.2.1 Specifications shall be available, adequate, accurate and demonstrate compliance to relevant regulatory requirements. Specifications and procedures shall, as a minimum, include:

- Conformance to food grade standards for all food contact packaging specifications
- Compliance with relevant food safety requirements for all raw material specifications
- Approval of all changes to food contact packaging or raw materials used for Starbucks' product by a Starbucks' assigned authority.

5.3 Raw material and packaging approval and monitoring

5.3.1 The supplier shall have a documented procedure for the acceptance of raw materials and packaging upon receipt. Raw material acceptance and its release for use shall be based on one, or a combination of, the following:

- Visual inspection on receipt with clearly defined accept or reject criteria
- Acceptable product and trailer temperatures for all temperature-controlled materials
- Certificates of conformance – specific to each lot
- Certificates of analysis – specific to each lot
- Purchase from an approved supplier
- Product date and/or expiry checks
- Integrity checks on the packaging of all incoming goods
- Product sampling and testing to verify compliance to specification

5.3.2 A list of raw materials and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined.

5.3.3 Temperature-controlled products shall not be accepted if the temperature is above legal requirements.

5.3.4 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.

5.3.5 Certificates of Analysis for products requiring microbiological assessment shall be held on file.

5.3.6 Ingredient or work-in-process contact liners used by the supplier shall be appropriately colored to be distinct from product and resistant to tearing to prevent accidental contamination.

5.4 Outsourcing

5.4.1 The supplier shall ensure that approval and monitoring of subcontractors conforms to the Supplier Approval and Performance Monitoring section of this Standard.

5.4.2 The supplier shall establish inspection and test procedures for outsourced product upon return, including visual, chemical and/or microbiological testing, dependent on risk assessment.

5.4.3 Any outsourced processing operations shall:

- Be undertaken in accordance with established contracts which clearly define any processing requirements and product specification
- Undergo annual audits by the supplier and/or maintain a GFSI certification for that facility
- Maintain product traceability

6 Product control

6.1 Product Design/Development

6.1.1 The supplier 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 supplier or customers (for example, the introduction of allergens, glass packaging or microbiological risks).

6.1.2 All new products, raw materials and changes to product formulation, packaging or methods of processing shall be formally approved by the HACCP team leader or authorized HACCP committee member prior to use within the facility.

6.1.3 Trials using production equipment shall be carried out where it is necessary to verify that product formulation and manufacturing processes are capable of producing a safe product of the required quality.

6.1.4 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.

6.1.5 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. Label review for compliance shall be documented, signed and dated by the responsible individual.

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

6.2 Finished product specifications

6.2.1 Starbucks formatted specifications shall be available for all finished products. In the case of third party branded products, specifications shall include key data to meet legal requirements and assist the customer in the safe usage of the product.

6.2.2 Changes to Starbucks Coffee Company's finished products specifications, associated processes, food contact packaging or ingredients shall not be made without the approval of Starbuck's assigned authority.

6.3 Chemical contaminant control

6.3.1 Processes shall be in place to manage the use, storage and handling of chemicals to prevent chemical contamination. These shall include, as a minimum:

- An approved list of chemicals for purchase

- Availability of safety data sheets (SDS; formerly, MSDS) and specifications
- Confirmation of suitability for use in a food processing environment
- Avoidance of strongly-scented products
- The labelling and/or identification of containers of chemicals at all times
- Segregated and secure storage with restricted access to authorized personnel
- Segregation of food-contact and non-food-contact chemicals
- Chemical inventory records
- Procedures for use by trained personnel only

6.3.2 Where strongly scented or taint-forming materials have to be used (for instance, for building work) procedures shall be in place to prevent the risk of contamination of products.

6.4 Physical contaminant control

6.4.1 Where appropriate, there must be adequate systems in place to protect product from glass or brittle material contamination.
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

6.4.2 Documented procedures for handling glass and other brittle materials shall be in place and implemented to ensure that necessary precautions are taken; procedures shall, at minimum, include:

- A list of items, detailing location, number, type and condition
- Recorded checks of items, carried out at a specified frequency, which is based on the level of risk to the product
- Details on cleaning or replacing items to minimize potential for product contamination
- Instructions for handling breakage that covers quarantining product, cleaning of area, disposal/changing of PPE used during clean up
- Inspection for post clean-up

6.4.3 When metal equipment is used, there must be adequate systems in place to protect product from metal contamination:

- There shall be a documented policy to the control of the use of sharp metal implements, including knives; knives employing snap-off blades shall be prohibited within the facility; the policy shall include a record of inspection for damage and the investigation of any loss or damage of the aforementioned items
- When appropriate, policies describing visual inspection of cutting blades, needles and cutting wires on equipment shall supplement existing maintenance policies

6.4.4 When appropriate, there must be adequate systems in place for the control of physical product risks (for example, magnets, filters, sieves or optical sorting equipment). Systems shall, as a minimum:

- Be documented on the HACCP plan and have verification that demonstrates their effectiveness
- Be subject to regular checks to confirm the integrity of systems and records of such checks

6.4.5 Wood pallets used in processing areas shall be maintained to control potential food safety risks. The supplier must document standards to identify pallets which may be used and guidelines for pallets which present a threat to food safety and must be discarded. Where wood pallets are permitted, employees must have documented training on the standard. Slip sheets shall be used with wood pallets.

6.4.6 Where metal detectors or X-ray equipment are used, this shall be situated at the latest practical step in the process flow and, wherever possible, after the product has been packaged.
Metal detection devices shall be in place on all lines, unless a risk assessment demonstrates that this does not provide additional protection from metal contamination to finished products.

6.4.7 The supplier shall establish and implement documented procedures for the operation and testing of the metal detector or X-ray equipment. This shall include, as a minimum:

- Individuals responsible for the testing of equipment and frequency of tests
- Activities to monitor the operating effectiveness and sensitivity of the detection and rejection mechanisms (and any variation to this for particular products)
- The methods and frequency of checking the detector
- Requirements for cleaning of test pieces to prevent contamination of other products

6.4.8 The detector operation shall be checked with the use of test pieces incorporating a sphere of metal (ferrous metal, stainless steel and non-ferrous metal) of a known diameter; test pieces shall be marked with the size and type of test material contained.

6.4.9 Metal detector test pieces shall be passed through the center of the aperture and, when possible, inserted inside a clearly marked sample of the food produced or, in the case of in-line equipment, within the product flow

6.4.10 Checks shall be performed that test the memory/reset function of the metal detector by passing successive test packs through the unit.
Results of checks shall be recorded.

6.4.11 The metal detector or X-ray equipment shall incorporate one of the following:

- An automatic rejection device, for continuous in-line systems, which shall divert contaminated product out of the product flow (optionally, to a secure unit accessible only to authorized personnel)
- A line stop or verified rejection system and an alarm (either visual or audible) to signify the detection of metal contamination

6.4.12 In-line detectors which identify the location of the contaminant shall be operated to allow effective segregation of the affected product.

6.4.13 Based on risk assessment, procedures shall be implemented to minimize foreign material contamination originating with the packaging container (for example, jars, cans and other pre-formed rigid containers).

- This may include the use of covered conveyors, container inversion and foreign material removal through rinsing with water or air jets
- The purchase of ingredients and packaging which use staples or other foreign-body hazards as part of the packaging materials shall be avoided; where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimize the risk of product contamination

6.4.14 The effectiveness of the container cleaning equipment shall be checked and recorded during each production. Where the system incorporates a rejection system for dirty or damaged containers, the check shall incorporate a test of both the detection and effective rejection of the test container.

6.4.15 Staples, thumb tacks, pins and paper clips shall not be used in open product areas.

6.4.16 A system for documenting, investigating and preventing the introduction of found foreign material to the food stream must be available. Foreign material findings will be trended to identify additional opportunities for their prevention and elimination.

6.5 Management of Allergens

6.5.1 Documented procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination into products not containing the allergen. This shall include, as appropriate:

- Physical or time segregation while allergen-containing materials are being stored, processed or packed
- The use of separate or additional protective uniforms when handling allergenic materials
- Use of identified, dedicated equipment and utensils for processing
- Scheduling of production to reduce changes between products containing an allergen and products not containing the allergen
- Systems to restrict the movement of airborne dust containing allergenic material

- Process flow procedures to prevent cross-contamination during raw material or finished product movement
- Waste handling and spillage controls
- Restrictions on food brought onto site by staff, visitors, contractors and for catering purposes
- Storage conditions must prevent cross-contamination and conform to the requirements found in the *Storage facilities* section of this Standard

6.5.2 The supplier shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, work-in-process and finished products and any new product development ingredients or products.

6.5.3 The supplier 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, obtaining 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.

6.5.4 Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers, the supplier shall ensure that the production process is fully validated to meet the stated claim. This shall be documented.

6.5.5 Routes of contamination shall be risk-assessed, and procedures for handling raw materials, work-in-process and finished products documented to ensure cross-contamination is avoided.

6.5.6 Procedures for return of non-allergen-containing raw materials, after exposure to allergens during production and processing activities, into storage shall be in place.

6.5.7 Where rework is used, or reworking operations carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen.

6.5.8 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 with protein-specific testing. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single-use or effectively cleaned after use.

6.5.9 All relevant personnel, including engineers, temporary staff and contractors, shall have received general allergen awareness training and be trained in the supplier's allergen handling procedures.

6.5.10 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.

6.5.11 Where the nature of the production process is such that cross-contamination from an allergen cannot be prevented, a warning shall be included on the label.

National guidelines or codes of practice shall be used when making such a warning statement.

6.6 Product Inspection and Laboratory Testing

6.6.1 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. Where applicable, product safety testing shall conform to requirements outlined by Starbucks.

6.6.2 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.

6.6.3 Procedures shall be in place to ensure reliability of laboratory results and conformance to Good Laboratory Practices. These shall include:

- Use of recognized and validated test methods, where available (For LEMP methods shall be validated and recognized)
- 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 (for example, ring or proficiency testing)
- Use of appropriately calibrated and maintained equipment
- Appropriate disposition of food products entering the lab to prevent reintroduction to the production environment and storage facilities

6.6.4 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

6.6.5 Where an external laboratory is used for product/swab analysis, the laboratory should be accredited to ISO 17025 or equivalent. For Listeria testing, the testing lab shall be accredited and the scope of the accreditation shall cover the applicable microbiological testing.

6.6.6 The supplier shall ensure that finished product is not released unless all agreed procedures have been followed.

6.6.7 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.

6.6.8 Test records shall conform to the applicable document control and record retention requirements of this standard.

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

7 Process control

7.1 Control of Operations

7.1.1 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 are 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

7.1.2 Process monitoring, such as temperature, time, pressure and chemical properties, shall be implemented, adequately controlled and recorded to ensure that product is produced within the required process specification.

7.1.3 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.

7.1.4 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 (for example, heat distribution in retorts, ovens and processing vessels; temperature distribution in freezers and cold storage).

7.1.5 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.

7.1.6 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, are in good operating condition 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.

7.1.7 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

7.2.1 All temperature recording equipment shall be in good operating condition and conform to the requirements in the *Calibration and Control of Measuring and Monitoring Devices* section of this Standard.

7.2.2 Where temperature control is required, the temperature shall be monitored and documentation available.

7.2.3 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. Action and/or verification records shall be available.

7.2.4 All food and beverage components must be maintained within their specified temperature range. All perishable foods shall be stored chilled.

7.2.5 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

7.3.1 The supplier 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.

7.3.2 The frequency and methodology of quantity checking shall meet the requirements of appropriate legislation governing quantity verification, and records of checks shall be maintained.

7.3.3 Where the quantity of the product is not governed by legislative requirements (for example, bulk product), the product must conform to customer requirements and records shall be maintained.

7.4 Calibration and Control of Measuring and Monitoring Devices

7.4.1 Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform. All identified measuring devices, including new equipment, shall be calibrated at a predetermined frequency based on risk assessment and to a defined method traceable to a recognized national or international standard, where possible. Where a traceable calibration is not possible, the supplier shall demonstrate the method and rationale of the standardization carried out.
Results shall be documented and if calibration is outsourced, calibration certificates must be available.

7.4.2 Equipment shall be labeled with identification codes and calibration due dates. The company shall have documented procedures that include:

- A documented list of equipment and its location
- Identification of equipment used to monitor CCP
- Methods for prevention from adjustment by unauthorized staff
- Methods for protection from damage, deterioration or misuse

7.4.3 Verification procedures shall be in place to ensure equipment is of a suitable accuracy for the measurements it is required to perform. Frequency of checks shall be based on risk assessment.

7.4.4 Procedures shall be in place to record actions to be taken when the prescribed measuring and monitoring devices are found not to be operating within specified limits.
Where the safety or legality of products is based on equipment found to be inaccurate, action shall to be taken to ensure at-risk product is not offered for sale. Non-compliant equipment must comply with maintenance requirement of this standard to prevent accidental use.

8 HACCP

8.1 Assemble the HACCP team

8.1.1 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.

8.1.2 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. Relevant records must be available to demonstrate each team members training and qualification.
In the event of the supplier 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 supplier.

8.2 Describe the products in scope

8.2.1 The scope of each HACCP plan, including the products and processes covered, shall be defined. HACCP plans shall exist for all Starbucks Coffee Company products produced at the facility.

8.2.2 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 supplier 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

8.3.1 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 (for example, infants, elderly and allergy sufferers).

8.3.2 Information regarding storage and handling requirements, further processing requirements, and exclusions to the product shall be described.

8.4 Develop a flow diagram

8.4.1 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 and packaging receipt through processing, storage and distribution. The flow diagram must include inputs and outputs from the process (for example, waste, animal feed, etc.).

8.4.2 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.

8.5 Conduct a hazard analysis

8.5.1 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 all raw materials, those introduced during the process or surviving the process steps, and allergen risks (see *Management of Allergens* within the Standard). It shall also take into account the preceding and following steps in the process chain.

8.5.2 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, growth and/or toxin formation of micro-organisms of specific concern to the product
- Chemical (including allergen) or foreign object contamination of raw materials, work-in-process/semi-processed product, or finished product

8.5.3 Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.

8.5.4 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 and documented. Consideration may be given to using more than one control measure.

8.6 Determine critical control points

8.6.1 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.

8.7 Establish critical limits

8.7.1 For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control.

8.7.2 The HACCP food safety team shall validate each CCP. Documentation of validation shall be based upon scientific principles, known standards or recognized bodies of knowledge.

8.7.3 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.

8.8 Establish a monitoring system for each CCP

8.8.1 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
- Where discontinuous measurement is used, the system shall ensure that the sample taken is representative of the batch of product

8.8.2 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.
Employees responsible for recording or verifying records of CCPs must conform to the *Personnel Training* portion of the Standard.

8.8.3 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.

8.9 Establish a corrective action plan

8.9.1 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.

8.10 Establish verification procedures

8.10.1 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

8.10.2 Product shall not be released for shipment until verification of all CCPs have been completed and approved by a second trained individual.

8.11 HACCP documentation and record keeping

8.11.1 Documentation and record keeping shall be sufficient to enable the supplier to verify that the HACCP controls, including controls managed by prerequisite programs (aka mandatory elements), are in place and maintained.

8.11.2 Deviations from HACCP Plans must be clearly documented; preventive and corrective actions taken must be documented.
Documentation and record keeping shall comply with the Document control and record retention section of this standard.

8.12 Review and maintenance of the HACCP plan

8.12.1 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. Appropriate changes resulting from the review shall be incorporated into the HACCP plan. As a guide, these may include the following, although this is not an exhaustive list:

- Change in raw materials or supplier of raw materials
- Change in ingredients and/or recipe
- Change in processing conditions or equipment
- Change in packaging, storage or distribution conditions
- Change in consumer use
- Emergence of a new risk (for example, Change to the facility's allergen program)
- Developments in scientific information associated with ingredients, process or product

8.12.2 Procedures must be in place to assess when Food Safety Systems are not operating effectively.

8.12.3 The scope of the annual review must be documented, and signature and date recorded for each individual participating in the review.

9 Audit Rating

9.1 Nonconformity classification

Nonconformities observed during a Starbucks audit are classified into 3 severity levels:

Minor**:**

- There is a spot deviation from a clause that 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 (for example, a cleaning deficiency was cited in a low-risk zone)
- Minor nonconformities are a 1 percent deduction from the audit score
- Supplier must provide evidence of corrective action within 30 days of receiving the audit report

Major:

- There is a repeated, structural or severe deviation that may represent a food safety risk or will likely lead to product quality issues
- Examples: The Hazard Analysis within a HACCP plan omits relevant hazards; an employee failed to wash their hands when entering a high-risk or high-care zone; chemical concentration checks are not measured adequately; CP records deviations are not corrected; loss of traceability; a minor conformity from a previous audit that was not adequately addressed
- Major nonconformities are a 3 percent deduction from audit score
- Corrective action should be performed within 15 days of receiving the audit report and Starbucks will determine if root cause analysis is needed. If corrective action plans will exceed that time frame, Starbucks approval is needed.

Critical:

- There is a severe, repeated and/or structural deviation that has a food safety impact
- Examples: Severe sanitation deficiencies during pre-operational inspection of food contact equipment with no corrective actions, evidence of pests in a high risk area, CCP deviation unaddressed, falsified records, observed product contamination
- Critical nonconformities are a 50 percent deduction from audit score

- Supplier must submit their immediate corrective action plan within 1 day and root cause analysis is required.

9.2 Underperforming audits

Audits with scores of ≤ 70% will be considered underperforming and will require a facility re-audit within 6 months of the initial audit. Two consecutive failed audits may lead to a potential loss of business.

Attachment 2, Grower-Level Food Safety for Fresh Produce*

*Fresh Produce is defined as fresh vegetable, fruit, and sprout crops.

A. Audits required for all companies who grow, harvest, package or further process fresh produce:

Good Agricultural Practices (GAP) Part 1

- Growers shall have a Good Agricultural Practices (GAP) audit for every ranch each year. The ranch audit is divided into sections that correspond to areas of potential contamination risk in the field operation. These areas include: ranch history, adjacent land use, fertilizer usage, water usage and its sources, pest control, harvest practices, employee safety and food security. A ranch is defined as a parcel of ground with the following characteristics: common management, common water supply and continuous grounds.

  The Global GAP audit standard is preferred, however Starbucks will accept harmonized GAP Audits from the following: (Primus GFS, USDA, Asco, Equicert, NCSI, SCS, SGS, and NSF). Any other non-recognized third party audit company must be approved by Starbucks.

- Harvest Crews of the commodities listed above shall be covered by the GAP audits listed above and shall address this key area of food safety; for a GAP audit to be accepted by Starbucks. A comprehensive food safety program must be created as the direct result of a HACCP risk assessment of each ranch, greenhouse & or field prior to harvest: key areas that shall be covered are: GMP's for employees, employee safety and hygiene, harvest best practices and food security. This key aspect of Food Safety and Quality falls directly under the oversight of seller of the commodity.

  Packing Houses, Cooling / Cold Storage & Distribution: (HACCP Based) Part 2

- The packing house, Cooling / Cold Storage & Distribution areas of the GAP audit are GMP focused and the risk assessment ties back to the HACCP Fundamentals. The commodity in this scenario undergoes the following: sorting, washing, packaging, cooling and shipping. Since the handling of produce is minimal, the HACCP based standards for these operations fall more adequately into Good Manufacturing Practices area of food safety. The audit focuses on: pest control, equipment sanitation, employee hygiene practices, traceability and proper packaging, labeling and storage and all other operational practices that ensure food safety of the product.

  Processing with HACCP [GFSI]

- The Processing audit is required to be performed each year. Processing is defined as: cutting, blending, pureeing, juicing or other more extensive manipulation of the commodity. Starbucks will accept only GFSI based Food Safety Certification for this handling of the product. More GFSI information can be found in the "Starbucks" Standards for Food Suppliers.

Commodities

- High-care commodities such as alfalfa sprouts, bean sprouts, wheat grass and clover sprouts fall into a special category for Starbucks. The audit for this special category is a result of best practices learned in the past several years through interface with academia, food safety consultants and industry. This audit will be conducted by Starbucks or a 3rd party on behalf of Starbucks
- Medium risk commodities such as: leafy greens, celery, other vegetables will have certain specialized requirements that are commodity specific which shall be defined in the product specification. One example of this is a pre-harvest microbiological field testing prior to harvest. Requirements will vary pending on commodity history and vendor history.
- Lower risk commodities such as: citrus and root vegetables shall be monitored but pre-harvest requirements tend are less comprehensive due to the nature of the product. Each commodity will be handled on a case by case basis and the requirements will be clearly defined in the product specification.

Additional Starbucks Audits:

- Based on risk and commodity, Starbucks may elect to conduct its own audits of the supplier. They include:
  - Verification audit - for medium to low risk commodities such as citrus.
  - Starbuck's GAP audit - for high risk commodities such as leafy greens and/or suppliers not meeting expectations
  - Sprout audit – for suppliers of sprouts, wheat grass and similar commodities
- For the Starbucks Risk assessment grid see section 10.13

Audit Scoring:

- Audits will be scored on a 100 point total basis with an 80% minimum acceptance for an initial audit with corrective actions. After approval for Starbucks the expectation minimum score of 85% is set, with continuous improvement expected.

Corrective actions:

- 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

B. Specifications:

- All individual commodities shall have Starbucks approved specifications that Starbucks will purchase and receive product against as stringent guidelines. The specification will cover the following: product description, physical description based upon intended use, organoleptic preferences, color, size, shape, count per pound or other descriptive measures. In most cases the starting base will be the USDA grade A standard but it shall be modified through consultation with the Vendor, Starbucks Procurement, R&D, Global Quality, Food Safety & Regulatory affairs.

C. Required Microbial Testing:

- Microbial testing requirements will be commodity specific and will be included in the specification. Pre-Harvest microbiological testing will be required for High-care commodities. Pathogens will be tested for and shall be identified along with: sampling pattern, sampling plan composting plan and specific microbiological methods identified by Starbucks. Presumptive results, if confirmed positive, harvest for that field or designated lots covered in the sampling shall be eliminated. Starbucks will only accept laboratory results from accredited ISO 17025 laboratories, running FDA, BAM certified methods.

- Finished product micro testing will be handled on an "adhoc" basis and will be identified in the specification.

D. Required Chemical Testing:

- Pesticide, Herbicide, fungicide testing results shall be available to Starbucks if requested.

- Other Chemical analysis shall be required on an as-needed basis and shall be commodity specific. These requirements shall be included in the specification. (for example, heavy metals, brix)

E. Required Foreign Material Control:

- Metal Detection, X-Ray, Laser Sorting shall be used whenever prudent for food safety purposes to ensure that foreign material is adequately controlled. Further examples include: glass & hard plastic policy, roper location of conveyors, covered work areas so that product is not exposed to an open environment may be warranted. Each situation may be evaluated on a case by case basis.

F. Packing Material:

- Suppliers shall have a program in place to approve and monitor all packaging material. Packaging material shall acceptable for food use and shall meet all industry standards. Letters of guarantee & appropriate 3rd party audits shall be available upon request.
- Storage of packing material shall not compromise the safety or integrity of the product.

G. Pest Control:

- Pest Control programs are required and must be monitored, controlled and applied by licensed personnel. Maps, chemicals used and frequency of applied chemicals shall be documented. Chemical storage shall be a reasonable distance from the commodity and all chemicals must be properly labeled at all times.

H. Glove Policy:

- Starbucks requires that if gloves are used they must be managed with a strict glove policy. Disposable gloves should be used and discarded each time an employee leaves their work area or touches a non-food-contact surface. Latex gloves are not acceptable due to potential allergen concerns.

I. Test & Hold Guidelines:

- Product must be in supplier control until all specified test results have been completed and results fall within the designated ranges agreed upon within the specification.

J. Code Dating & BIUB:

- Suppliers shall provide code dating information.

K. Traceability:

- Lot definition shall be clearly identified and written into the product specification.
- Each processing facility shall conduct 3 traceability exercises each calendar year. It is preferred that the exercise be included during a 3rd party audit where the auditor picks a day in the last calendar year and asks the facility to do a complete exercise both forwards and backwards within 2 hours' time with 100% accountability. The reaming 2 exercises can be done internally but records need to be retained so that if a request for such documentation has been made, it can be identified by date and time.

L. Documentation:

- All relevant Food Safety, Quality , COAs, shall be sent to the appropriate designated individuals within Starbucks