

## Quality Assurance Bulletin

### SQF Version 9 – Does your On-Site Lab Comply with the New Code?

#### SQF V9 Food Manufacturing Code 2.4.4.2:

*Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list.*

Never before have our on-site labs been subject to such scrutiny, and for most of us, this means that our next SQF auditor will be looking closely at our testing methodology and the proficiency of our technicians. The good news is that most dairy labs are already doing several things to demonstrate compliance, and if you are a [Grade A PMO](#) compliant plant and/or a participant in the Quality Chekd Compliance Program and/or the Quality Chekd-Merieux Proficiency Program, you have a jump start on the new guidelines!

#### Food Safety Testing in our On-site Labs

Though much of our onsite testing is considered 'quality testing', **the distinction between *food safety testing* and *food quality testing* may not be readily apparent to an auditor.** Thus, we must be prepared to demonstrate how we have determined our risks, that our methodology is sound and that proficiency is confirmed for all persons conducting the tests. For some tests, it will be important to conduct documented in-house proficiency round tables and/or routine observation. Also, make sure to have any test validation data and instructions for use on hand for your auditor to review. The following are a few examples of what an auditor may consider a food safety test.

**Test:** Appendix N Antibiotic Screens

**Risk:** Antibiotic Residue

**Approach:**

Per the [FDA-NCIMS 2019 Evaluation of Milk Laboratories](#) document, staff conducting screens are subject to annual proficiency testing in applicable tests, which are based upon established ISO standards. As a Grade A plant, your lab will have this on file. Make sure to have any test validation data and instructions for use on hand for your auditor to review.

**Test:** Sensory Analysis

**Risk:** Adulteration or defect that may pose a food safety hazard

**Approach:** Is a sensory analysis a 'food safety test'? According to SQFI staff, the answer is likely 'yes'. Especially if used as the product release criterion. To demonstrate proficiency in sensory analysis, standardized flavor samples are available from Merieux NutriSciences. Also, retained Quality Chekd Compliance Program samples can be evaluated in tandem with the 17-day sensory performed at Merieux to show competence of your team members. Contact [Amanda Moore](#) for more information.

**Test:** Alkaline Phosphatase

**Risk:** Pasteurization System Failure

**Approach:** If your food safety program indicates that an alkaline phosphatase test is required to demonstrate effective pasteurization, it may be subject to the SQF Code 2.4.4.2.

**Test:** ATP and/or Allergen Swabs

**Risk:** Contamination/Allergen Introduction

**Approach:** If your food safety program indicates that ATP and/or Allergen Swabs are used to demonstrate effective sanitation and allergen elimination, it may be subject to the SQF Code 2.4.4.2.

**Test:** pH

**Risk:** pH not sufficiently low to inhibit microbial growth

**Approach:** If your food safety program indicates that your product's pH must be within a certain range to comply with regulatory requirements or to mitigate food safety concerns, it may be subject to the SQF Code 2.4.4.2.

### What about Food Quality Testing?

If certified to the SQF Quality Code, proficiency should be demonstrated, but the Quality Code does not demand accordance with the applicable requirements of ISO/IEC 17025:

*2.4.4.2 On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer, regulatory, and/or company requirements and meet quality objectives. External laboratories shall be accredited to ISO/IEC 17025 or an equivalent international standard and included on the site's contract service specifications list (refer to 2.3.2.7).*

### Must your Lab be ISO/IEC 17025 Certified?

NO. SQF representatives have stated that the processor need *not* be ISO/IEC 17025 certified.

### Should your Lab purchase a copy of ISO/IEC 17025?

SQF representatives have stated that the processor need *not* purchase a copy of this. However, compliance with this standard is difficult to verify if the standard is unknown or not on hand! If you would like more information on the ISO/IEC 17025 standard, please contact [Amanda Moore](#) for more information.